

## Compliance Assessment Report CAR\_NRW0043326

**Permit being assessed:** AB3092CV.

**For:** Parc Adfer Energy Recovery Facility, **held by:** Enfinium Parc Adfer Operations Ltd

**At:** Weighbridge Road, Deeside Industrial Park, Deeside, Flintshire, CH5 2GY.

**Type of assessment:** Report/Data Review,

**Reason:** Routine.

**On:** 31/12/2023.

**Parts of permit assessed:** SEE NOTES (Section 4).

**NRW Lead Officer:** Victoria Griffin.

**Report sent to:** Jamie Williams, SHEQ Manager, on 15/02/2024.

### 1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1C - Management - Energy Efficiency	Assessed (A)	
IR1D - Management - Efficient use of raw materials	Assessed (A)	
IR1E - Management - Avoidance, recovery and disposal of wastes produced by the activities	Assessed (A)	
IR3A - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3E - Emissions and monitoring - Monitoring	Assessed (A)	
IR3H - Emissions and monitoring - Monitoring for the purposes of the Industrial Emissions Directive (includes LCP)	Assessed (A)	
IR4B - Information - Reporting	Assessed (A)	
IR4C - Information - Notification	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

## 2. What action is required?

No action required.

## 3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

**At this time, we do not intend to take any further action.**

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

## 4. Details of our assessment

This Compliance Assessment Report (CAR) has been generated by Natural Resources Wales (NRW) Regulating Officer to comment upon the Annual Report and Q4 Monitoring Returns.

### **1. Q4 Monitoring Returns**

Q4 2023 (October - December) monitoring results were submitted to NRW on 19/01/2023 in accordance with Condition 4.2.3.

#### **1.1 Air Emissions - Emission Point A1**

Continuous air emissions monitoring (CEMS) was undertaken in accordance with Condition 3.6.1.

Emissions to air for Hydrogen Chloride (HCl) (mg/Nm<sup>3</sup>), Ammonia (NH<sub>3</sub>) (mg/Nm<sup>3</sup>), Total Organic Carbon (TOC) (mg/Nm<sup>3</sup>), Oxides of Nitrogen (N<sub>2</sub>O and NO<sub>x</sub>) (mg/Nm<sup>3</sup>), Sulphur Dioxide (SO<sub>2</sub>) (mg/Nm<sup>3</sup>), and Particulates shows no Half Hourly nor Daily Average ELV exceedances during Q4 in accordance with Condition 3.1.2.

Daily averages were invalidated on the following dates as follows:

- 20/11/2023 - 23/11/2023 –plant offline due to a planned outage to repair refractory and replace a damaged grate bar.
- 20/11/2023 – 1x 10 min CO reading invalidated due to both CEMS analysers being in backflush mode because of residual interference just before the plant entered shutdown mode.
- 28/11/2023 – 1x 10 min CO reading invalidated due to both CEMS analysers being in calibration mode at the same time for a short period.

Emissions to air for Carbon Monoxide (CO) (mg/Nm<sup>3</sup>) shows no 10 minute (ELV 95th percentile) nor Daily Average ELV exceedances during Q4 in accordance with Condition 3.1.2.

#### **1.2 Waste Returns**

Waste returns were received in accordance with Condition 4.2.5

- Waste Received - Overall tonnage for Q4 - 57,389 tonnes
- Waste Removed - Overall tonnage for Q4 - 12,871 tonnes

### **1.3 Residues**

Incinerator Bottom Ash (IBA) and Air Pollution Control (APC) residues sampling was undertaken in October 2023 in accordance with Condition 3.6.1. Bottom Ash composition for Q4 remained below the 3% TOC limit at 0.6 % in accordance with Table 3.4 of the Permit.

### **1.4 Performance**

Plant operating hours are recorded as 7881 for Q4, with no periods of abnormal operations.

### **1.5 Schedule Notifications**

A Part A & B Schedule 5 Notification was received on the 3 November 2023, relating to an expansion flap opening for less than one second as a safety response to increased pressure within the boiler. The likely cause was an unidentified gas bottle in the waste. The facility regularly undertakes waste inspections to target and identify any potential issues and regularly engages with waste suppliers.

## **2. Annual Report**

The Annual Report was submitted to NRW via email on 19/01/2024 as required by Permit Condition 4.2.2.

### **2.1 Performance**

7,881 Operating hours were recorded between 01/01/2023 and 31/12/2023 with no abnormal operations recorded.

The facility annual maintenance outage was completed between the 13 June and 30 June 2023.

### **2.2 Residues**

All IBA generated in 2023 was transported to a suitably permitted receiving and processing facility. APC residues were transported to a waste recovery operation facility.

### **2.3 Water and Other Raw Materials Usage**

Annual water and raw material usage is reported in accordance with Condition 4.2.2 and shows no significant increases.

### **2.4 Waste Returns**

Annual waste data reported in accordance with Condition 4.2.5 shows a slight increase in waste received, although it is well below the permitted capacity of 232,000 tonnes per annum.

- Waste Received - Overall tonnage for the year – 205,728 tonnes.
- Waste Removed - Overall tonnage for the year – 49,531 tonnes

### **2.5 Emissions to Water**

No specific events to report following weekly monitoring. All discharges free of any visible

solids, oils or greases.

## **2.6 Annual Energy Usage and Efficiency**

Annual energy usage reported in accordance with Condition 4.2, shows no significant increases.

Indicative R1 Calculation states 0.71, based on 86% Boiler efficiency +/- 1.5%, which meets the minimum criteria for R1 status.

## **2.7 Air Emissions**

Continuously monitored pollutants were 100% compliant with ELVs for Half Hourly and Daily Averages.

Stack emissions monitoring and testing was undertaken during Q1 and Q3 in accordance with Condition 3.6.1. A PM10 and PM.5 survey was also completed during Q3. All results were below the ELVs.

## **3. Periodic Reporting**

The following four yearly reports were provided by the Operator on 20/12/2023 as required by and in accordance with the Permit:

- Report AB3092CV - Parc Adfer 1.2 Energy Efficiency Review. Permit condition 1.2.1 (b)
- Report Parc Adfer HN DFS WP1 Report. Permit condition 1.2.3
- Report AB3092CV Parc Adfer - 1.3 Efficient Use of Raw Materials. Permit condition 1.3.1 (c)
- Report AB3092CV Parc Adfer - 1.4 Generation, Treatment and Disposal of Waste. Permit condition 1.4.1

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

## Important information

### Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

### Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

### How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

**If your assessment result in Section 1 is suspended, what does this mean?**

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

**Full list of Industry compliance criteria** (used in section 1 and 2):

**1. Management**

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

**2. Operations**

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

**3. Emission and Monitoring**

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

**4. Information**

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

**Enforcement response**

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

### **Data protection notice**

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

### **Disclosure of information – this report will be available to view on-line**

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

### **What do I do if I disagree with the report or have a complaint?**

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk) for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at [ask@ombudsman.wales](mailto:ask@ombudsman.wales)

### **Welsh Language Standards**

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.