

Compliance Assessment Report

Report ID:
CAR_NRW0035591

This form will report compliance with your permit as determined by an NRW officer

Site	Tremorfa Anaerobic Digestion Facility	Permit Ref	AB3093CA		
Operator/Permit holder	Welsh Water Organic Energy (Cardiff) Limited				
Regime	Installations				
Date of assessment	15/08/2019	Time in	10:00	Out	13:00
Assessment type	Report/Data Review				
Parts of the permit assessed	As detailed				
Lead officer's name	Griffiths, Toby				
Accompanied by					
Recipient's name/position	Bleddyn Escott/ Plant Manger	Date issued	16/08/2019		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Specified by permit	X	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Meeting of 15th August 2019

Permit Ref: AB3093CA Food AD

This meeting was arranged to run through ongoing items etc. Most actions following previous CAR forms have been completed, however there are some ongoing. The following is a summary discussion.

Update on current status

The AD plant is running normally again following the recent problems with the front-end process. WWOE have engaged with contractors to review the design of the process to choose a more reliable solution. "Food soup" deliveries stopped last week. Reject material being removed regularly to minimise flies. A new office building is being commissioned at the entrance to site. Security review under way.

Waste Treatment BREF Review

There was a brief telecon with James Camis and Amy Powell, who confirmed that the Reg 61 responses would be sent in by the September deadline. The response will cover 3 sites – the composting site, the Food AD and the sewage works AD plant. One of the main aspects to consider was containment and NRW recommended that the CIRIA C736 guidance is used during the review.

Review of ongoing actions

Item	Details	Outstanding Actions
From CAR NRW0034508 (24/01/19)		
Ongoing actions relating to odour control unit review	see LVA3, 4, 8 (choice of media, change frequency and whether sniff tests are effective at detecting problems)	To provide responses to these queries and with reference to the H4 odour guidance. This is also covered in the BREF review as BAT for odour control.
Containment (LVA 6)	Records of 5 yearly risk assessments sent, but nothing related to containment is listed. NRW would expect weekly/monthly visual inspections and more thorough engineering inspections on a specified basis.	Please confirm what is in place for the integrity checking of containment on site. This should range from visual checks to full engineering inspections, and how often.
Annual returns	All now received except for: Flare (A5) received via ECL report, but not correct form. 4.2.2(a) report	Flare A5 needs to be send in on the Air 1 form. 2 exceedances shown which need to be sent on a Schedule 5. Please explain how emissions

		are being controlled to prevent further exceedances. Send in summary report for condition 4.2.2(a) for 2018
Flare monitoring arrangements	ECL noted that the sampling of the flare does not meet the requirements of the M1 Guidance. Need to ensure that there is a flare report for each calendar year. Flare temperature reported as too low.	Please confirm proposals to improve the monitoring arrangements at the flare. Another flare monitoring report will be due for 2019. Please confirm improvements to flare temperature to meet permit condition.
Table S3.2 monitoring	Confirmed that these are happening, but not received written confirmation of quarterly ammonia and monthly oil/grease checks	Please confirm these are carried out
CAR NRW0035289		
Emissions to air	Action #8 on SO ₂ exceedances. There have been exceedances from both the CHP stack and flare. These are partly related to the control of H ₂ S via dosing with ferric chloride. Proposal for improved dosing arrangements and bulk tank. Range of 100 – 200ppm for H ₂ S in biogas stated to be method of controlling emissions.	Please report back on what improvements are required (or have been implemented) to keep emissions within permit limits. Please show the link (e.g. graph) between H ₂ S in biogas and the emissions of SO ₂ .
Waste returns	Missing annual returns for 2017 and 2018 Also missing Q1 and Q2 returns (Jan-Mar, Apr – June)	Returns need to be on correct format and calendar year and split on basis of “disposal” or “recovery”. Please send annual and quarterly returns.
Notification requirements	Action #9 The notification requirements of the permit covered in section 4.3. e.g. permit breach, malfunctions, change of operator name etc.	Need to confirm that the site management system and procedures includes these requirements.
Other actions		
Trial to substitute Liquid waste for potable water	This proposal is to replace potable water with liquid waste as the additive to moisten the AD waste. There are benefits in terms of water savings and costs. This would include a new storage tank and would be on a test basis at first.	Please submit further details in a request to NRW for review.
Adding skips inside	The skips would collect rejected	This activity is considered part

building	wastes, instead of falling to floor of the plant.	normal operation, and would not require approval from NRW.
Additional biogas boiler	WWOE want to install a biogas boiler for use when the gas engine is off line. It would provide heat for the pasteurisation process and supply other plant needs. A spare unit from 5 Fords is proposed. The boiler is likely to be connected to the same stack as the CHP.	Please submit further details in a request to NRW for review.

Please respond to the actions by **31/08/2019**

EPR Compliance Assessment Report

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Operator/Permit holder	Welsh Water Organic Energy (Cardiff) Limited	Date	15/08/2019

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
A1	X	See actions specified in the table.	31/08/2019

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.