

Compliance Assessment Report

Report ID:
CAR_NRW0036401

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

Site	Parc Adfer Enery Recovery Facility	Permit Ref	AB3092CV			
Operator/Permit holder	Parc Adfer Operations Ltd					
Regime	Installations					
Date of assessment	07/02/2020	Time in	10:00	Out	13:15	
Assessment type	Site Inspection					
Parts of the permit assessed	All					
Lead officer's name	Kelk, Matthew					
Accompanied by	Lyndsey Rawlinson					
Recipient's name/position	Phil Preece / Plant Manager	Date issued	06/03/2020			

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
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
E1 - Emissions - Air	C4	3.1.2
E3 - Emissions - Surface water	A	
E5 - Emissions - Waste	A	

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	1	Total compliance score (see section 5 for scoring scheme)	0.1
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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

The Parc Adfer EFW plant was visited by Senior Industry and Waste Officer Matthew Kelk (Industry Regulation Team) and Head of North East Operation Lyndsey Rawlinson on the 7 February 2020.

The following issues were discussed:-

Outage

Outage is planned for 7 June 2020 for 16 days, incinerator will restart 22 June 2020.

Waste burnt

Fuel supply was discussed, EFW facility is currently permitted to take 200,000 tonnes of waste per annum. 90,000 tonnes per annum of council waste is supplied through the North Wales Residual Waste Treatment Project, the rest being made up of commercial/industrial waste via a contract with Veolia.

January 2020, > 18,000 tonnes of waste burnt, with no support required from support burners.

Incinerator Bottom Ash (IBA)

Incinerator bottom ash continues to be sent Ballast Phoenix in Runcorn, 9/10 lorries a day, with approximately 280 tonnes a day leaving site. ESA protocol met for waste stream.

IBA Storage Area

During the site walkover, the risk of dust generation was discussed from this area.

Following this discussion the following documents have been forwarded to NRW post visit:-

IBA collection procedure OPS-PAR-049 was reviewed following submission post inspection, the procedure generally appeared fit for purpose. It is recommended that particularly in dry weather that roads are swept more than once a week to avoid accumulation of dust.

Details have been forwarded to NRW of Parc Adfer's potential improvements to this area in the form of:-

- Wind break of fine mesh which will reduce the velocity of the wind over the IBA push walls and loading area.
- Dust suppression mist system to dampen down dust with fine water mist.

Following financial consideration, these measures may be fitted during the summer outage in June 2020.

Action

To forward to NRW a BAT/ cost benefit analysis in terms of dust suppression techniques for this area by 06/04/2020

Advice and guidance

During the site walkover, there was evidence that IBA product had been tipped beyond the front of the IBA holding bays, allowing wind to blow across the front end of the pile, this could lead to wind blown dust which could accumulate

on site and either cause a dust issue and/or leave the potential for contamination to enter the surface water drains. IBA piles should be moved within the IBA housing.

Attenuation Pond

Discussions were held around the use of the surface water attenuation pond and its subsequent discharge offsite, as there was some concern due to previously submitted results to NRW that there had been suspected ash within the water, this may have originated from the IBA storage area, which was recirculated back to site and not discharged.

Following the inspection, Parc Adfer have forwarded via email (17/02/2020) their intended operation of the penstock on the attenuation pond post 1st March 2020. After this date the penstock valve will remain open and the pond monitored carefully.

Wheelabrator's intention is that the penstock will remain open unless in the following circumstances ' *Should the condition of the water within the pond change deteriorate, the interceptor go into alarm or in order to prevent flooding of the surrounding area the penstock valve will be closed until the situation is rectified and NRW will be notified of the event*'.

Bunker House

During the visit Parc Adfer ran through a proposal to run a trial to leave the bunker doors open within the tipping hall, to improve waste tipping and housekeeping management. Further details were forwarded via email after the inspection. This will occur during weighbridge operational hours 07:30-17:30pm. This trial will run for a 3 month period and odour will be checked in accordance with the site's Odour Management Plan.

It was discussed during the site walkover that negative pressure will still remain within the building, odour is unlikely to escape from this building.

Action

NRW agree to this trial in principal and require that the results of which are forwarded to NRW following completion as per your proposal email of 14 February 2020. As outlined in your proposal if odour is detected outside the facility NRW require that the trial should cease and the source of the odour investigated.

Carbon Monoxide Breach

Notification received from site for Carbon Monoxide Breach on the 28 January 2020, 8 February 2020 and 20 February 2020.

28 January 2020 - 250mg/m³ vs 100mg/m³ half hour Emission Limit Value (ELV) for carbon monoxide breached for approximately 2 minutes 07:50 - 07:52.

8 February 2020 - 108.31mg/m³ vs 100mg/m³ half hour ELV for CO, 12:24 - 12:27.

Information received post ELV breach, metal jammed in moving grate system caused elevated level of CO.

20 February 2020 - 111.24mg/m³ vs 100mg/m³ half hour ELV for CO, 05:32 - 05:34

Part B received - Combustion O₂ level was set at 6.5% for the optimisation of combustion conditions by TUV (the performance testing contractor employed by CNIM), during their site testing.

The boiler O2 combustion level has now been set to 7.0% which is the CNIM design parameter. This higher O2 level will enable a buffering of the furnace conditions and enable more effective control of combustion conditions and CO generation.

Environmental Permit Condition 3.1.2 - The Limits given in schedule 3 shall not be exceeded

Minor CO breaches - score one consolidated category 4 score.

No further action required.

APCR trials

Current trials with Castle it is hopeful that the trials go well and that the site will be able to divert this waste stream away from landfill.

Plant on algorithm

Post inspection an email containing plant on algorithm has been forwarded to NRW, Parc Adfer are proposing a change to the way the DCS burn algorithm logic away from the total air fan driving the CEMS reporting on / off signal.

Parc intend to:- intended logic which will enable waste feed to be inhibited and the CEMs recording but not reporting whilst the plant is safely brought to rest with the correct EPR permit compliance and likewise on start up to achieve and to acknowledge stable combustion conditions prior to restarting CEMs reporting.

At the time of writing this CAR form the algorithm is currently under review and a letter will be sent to Parc Adfer shortly regarding this issue.

Permit variation

Permit variation to be submitted to change site permit from 200,000 tonnes of waste incinerated a year to for maximum capacity of 230,000 tonnes per annum. This variation application is to be submitted March/April 2020.

EPR Compliance Assessment Report

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Operator/Permit holder	Parc Adfer Operations Ltd	Date	07/02/2020

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.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

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			
E1	C4	no action required	06/03/2020

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.