

Compliance Assessment Report CAR_NRW0037169

Permit being assessed: AB3093CA.

For: Tremorfa Anaerobic Digestion Facility, held by Welsh Water Organic Energy (Cardiff) Limited

At: Tide Fields Road, Tremorfa, Cardiff, CF24 5SB.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 18/11/2020 between 10:00 and 11:30.

Parts of permit assessed: Operations

NRW Lead Officer: Geraint Harris, accompanied by Toby Griffiths.

Report sent to: Mark Esposito, Operations Manager on 23/11/2020.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
E1 - Emissions - Air	C3 Minor	3.1.2

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

Total number of non-compliances recorded	Total non-compliance score
1	4

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?

Criteria	Action needed	Complete by
E1	Provide a Schedule 5 Part B with a plan on how you intend to stop a reoccurrence	12/12/2020

Action criteria codes are listed in the 'Important information' section below.

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

Welsh Water Organic Energy Ltd (Food AD)

Permit ref: EPR/AB3093CA

Site visit of 18th November 2020

1. Introduction

A site induction and pre-visit discussion was held via MS Teams videocall on 17th November. Geraint Harris was introduced as the new NRW site officer. Due to Covid-19 restrictions, all parties were observing measures such as social distancing, and limiting time in confined offices etc. The bulk of the site inspection was carried out outside on the plant itself. Welsh Water Organic Energy Ltd (WWOE) provided a risk assessment ahead of the visit for review.

2. Business update

Liquid waste tank. Change of business priorities has meant this project has been shelved for the time being to allow other projects to progress, such as the new front-end process. It may be re-visited within the next 12-18 months.

New front-end process.

This is planned to be commissioned within the next 6 months and it is hoped that this will resolve the issues with recycling bag blockages and rejected material. It should improve recycling rates to 99%.

New boiler.

This was seen on site and is a new addition, which will burn biogas to reduce the likelihood of needing to flare gas during CHP outages which is wasted energy. A new emission point is in place (likely to be "A6"), but until the permit is varied, the boiler is not being used. The boiler can run on both gas or diesel if required, but the intention is that biogas is the principle fuel.

WWOE plan to submit a permit variation which encompasses these projects within the next 12 weeks.

Waste Treatment BREF.

The permit review is under way within the NRW permitting team and a draft permit should be available shortly.

EMS

WWOE reported that they have recently been accredited to ISO14001 which is specific to the Cardiff site. This should improve the OPRA score and WWOE should include this

during their OPRA review prior to submitting the variation application.

Extra CCTV has been installed to allow remote monitoring by the security guard at the main sewage works gatehouse. The site gates will also be moved further up the access road to improve security.

3. Last visit actions and ongoing actions

The majority of the actions have been closed out,

A Schedule 5 form (Part A) was received on 14th October 2019 for the exceedances of TVOC and CO ELVs for the flare (A5) on 23rd March 2019. Though it is noted that this should be sent as soon as the exceedance was noticed. In addition to recent servicing of the flare unit, WWOE's longer term strategy, as noted above, is to divert any surplus gas to the new boiler rather than flaring. This will ensure that flaring is below 10% annual usage and make for more efficient use of gas.

The exceedance of the ELVs at A5 is a non-compliance with permit condition 3.1.2 and is considered minor due to the short-term nature of flare use and the impact is likely to be low.

The Part B of the Schedule 5 – which gives more detail on rectifying the exceedance, has not yet been submitted. Although the use of the flare is likely to be reduced in future (thereby no longer requiring routine emissions monitoring), it is still necessary to ensure that it operates correctly and complies with the ELVs in the permit. The recent maintenance may have addressed this aspect, however NRW requests that the performance of the flare is reviewed and feedback given to NRW on any required improvements, including submission of the part B of Schedule 5.

Action: Please submit the flare review information to NRW.

4. Flies

No significant flies noted during the visit. The weather was cold and wet and this time of year is a low risk period for fly infestations. WWOE confirmed that the fly fogging system works all year round, but the dose is adjusted for winter.

5. Odour management

WWOE are undertaking a review of odour management following the September 2019

review by odour abatement specialist ATS. The recommendations of this report will be considered by WWOE. The odour unit uses a biomedica (coconut husk) which has a ~7 year lifespan. The “Pure Air Solutions” odour abatement unit was operating during the visit.

Action: Please provide NRW with an update on proposed actions following the review of the odour abatement unit.

6. Monitoring and ELV compliance

The process controls were demonstrated and explained to Geraint Harris by the site operators. Nearly all aspects of the site’s operations can be controlled from here with a real time display shown on screen. There is a system for out of hours duty in the event of a system error or malfunction. The reception hall doors were open during the visit as they were undergoing maintenance. In addition, the CHP was undergoing maintenance, though was running.

7. Tour - general

A full tour of the site was undertaken, including the reception hall, bund, top of a digester (weather station located), odour control unit, control room (limited numbers).

The weather station records wind speed/direction, temperature, atmospheric pressure, humidity and rainfall. This is a useful tool in preventing and investigating odour issues in the area. WWOE reported that certain treatment chemicals e.g. ferric chloride are being stockpiled in case of supply chain problems during BREXIT. Mitigation measures include working with other parts of the water industry to ensure adequate supply.

8. Conclusion

Overall, there were no significant issues noted, and arrangements appeared to be well managed. A number of follow up actions are listed in Sections 3 and 5.

End.

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.

What are suspended scores?

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 and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 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 – 18:00), or email 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

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.