

Compliance Assessment Report for:

STANDALONE MEDIUM COMBUSTION PLANT AND SPECIFIED GENERATORS

Permit number	PAN005141	Operator name	Newbridge Energy Ltd
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Site name	Newbridge Energy Ltd
Site address	Brickfield Lane, Denbigh Road, Ruthin, Denbighshire, LL15 2TN
Type of assessment	Review of emissions monitoring report and site inspection

Date of assessment	25.02.21	Time in	14:15	Time out	15:17
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Parts of permit assessed	Review of emissions monitoring report and site inspection
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NRW Lead officer	Jamie Blythin	Accompanied by	
Report sent to – Name and position	Peter Mills	Date	07.04.21

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
E1 Emissions – Air	A - Assessed, no evidence of non-compliance	3.1.2
G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales	C3 Minor	3.4.7 and 4.2.2
Choose an item.	Choose an item.	
Choose an item.	Choose an item.	
Choose an item.	Choose an item.	

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

Total number of non-compliances recorded
1

2. What action is required?

Criteria	Action needed	Complete by
G4	ACTION1 - Ensure annual extractive emissions testing is scheduled to allow testing to be completed and the Air1 report form submitted to NRW within 28 days of the end of the reporting period. Procedures in the Environmental Management System (EMS) should be updated to reflect this.	01/06/21

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 prosecutions and/or suspension or revocation of your permit.

4. Details of our assessment

This is a review of the Air1 report form (Form Number AIR1/17/12/19) form. This relates to emissions from the Biomass CHP plant exhaust which were sampled between 08/02/21-09/02/21. This form was submitted to NRW on 25/02/21.

The operator is required to carry out annual extractive emissions monitoring of the following parameters: Oxides of Nitrogen (NO and NO₂ expressed as NO₂), Carbon Monoxide, Dust (particulate matter) and Total Volatile Organic Compounds (TVOCs).

The emissions monitoring testing was carried out by an independent MCERTS accredited test house.

At the time of the emissions testing, the results show that the operator was compliant with the Emission Limit Values (ELVs) set by the permit (Table S3.1)

Parameter	Emission Limit Value	Reference Period	Result
Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	475 mg/m ³	Periodic (average over one hour)	340
Dust (Particulate matter)	50 mg/Nm ³		18.6
Carbon Monoxide	225 mg/Nm ³		23.3
TVOC	30 mg/Nm ³		9.9

NRW staff attended site on 09/02/21 to observe the emissions testing. The fuel being burned during this time was a mixture of woodchips and plant matter/ biomass. The plume dispersion was good.

The operator confirmed that the same mixture, 3:1 blend of woodchips (hacker) to biomass, was used for the duration of the two-day emissions testing. This is supported by the site production logs for these days.

Permit condition 3.4.7 states that the first monitoring measurements shall be carried out within four months of the issue date of the permit or the date when the generator is first put into operation, whichever is later.

Permit condition 3.4.7 has been breached as the first monitoring measurements were not carried out within the timeframes specified above (G4-CCS3 consolidated with condition 4.2.2)

Permit condition 4.2.2 requires that the operator shall submit reports of monitoring and assessment to NRW within 28 days of the end of the reporting period (deadline for operator to submit annual extractive monitoring report for 2020 was 14/01/21).

Permit condition 4.2.2 has been breached as the monitoring report for 2020s annual extractive emission testing was submitted late to NRW on 25/02/21 (G4-CCS3 consolidated with condition 3.4.7).

The operator states that the delays were due to the unavailability of a suitable testing house due to COVID-19. NRW has requested evidence of this but has not been provided with any.

ACTION 1- Ensure annual extractive emissions testing is scheduled to allow testing to be completed and the Air1 report form submitted to NRW within 28 days of the end of the reporting period. Procedures in the Environmental Management System (EMS) should be updated to reflect this **(complete by 01/06/21)**

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

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.