

Compliance Assessment Report CAR_NRW0038618

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 08/07/2021 between 10:00 and 11:30.

Parts of permit assessed: Site Inspection / Handover

NRW Lead Officer: Lewis Evans, accompanied by Geraint Harris.

Report sent to: Siobhan O'Leary-Johns, EHS Manager on 12/08/2021.

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

| Part of permitted activity assessed (criteria) | Assessment result | Permit condition |
|--|-------------------|------------------|
| G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales | Assessed (A) | |
| B5 - Infrastructure - Plant and equipment | Assessed (A) | |

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

| Total number of 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

Welsh Water Organic Energy Ltd

Permit Ref: EPR/AB3093CA

Site Handover Visit: 8th July 2021

NRW – Lewis Evans, Geraint Harris

WWEO – Siobhan O’Leary, Ross Wellington, Lee Douglas, Stephen Hutchings

1. Introduction

A site induction was organised via email to take place on the 8th July at 10am at the Welsh Water Organic Energy (WWOE) Tremorfa Site. The weather on the day was sunny and warm with a gentle breeze. Lewis Evans was introduced as the new NRW site officer. The visit was conducted with social distancing taking place at all times when possible, and the required PPE; eye protection, Hi-Viz, safety boots. Geraint Harris joined on the site visit. The visit was routine and for Lewis Evans to familiarise himself with the site.

2. Site Tour

A full tour of the site was undertaken, including the reception hall, bund, top of a digester (where the weather station is located), and odour control unit. A second weather station has been installed on the top of the digester. Any rainwater on site will be directed to the rain harvesting tanks and towards the head of the works.

The Biofilter is serviced annually, and general maintenance is carried out by the site as required. Within the next 12 months (2021 -2022) the coconut husk media will be assessed and replaced if required. Since 2018 when WWOE have been operating the site, there have been no complaints of odour.

3. Waste Treatment BREF

The permit was varied as a result of the Waste Treatment BREF. As a result of this, improvement conditions have been included for WWOE to submit to NRW.

Improvement Condition 1 - In accordance with the requirements set out within BAT 3 of the Waste Treatment BREF Document (EU 2018), the operator shall submit for approval in writing by Natural Resources Wales, a screening assessment considering channelled emissions to air from the biofilter (open and closed biofilters), and confirm if sources are within 250 metres of a sensitive receptor in accordance with ‘M9: environmental monitoring

of bioaerosols at regulated facilities'. – ***Due Date 20th July 2021 - Submitted currently being assessed.***

IC1 was submitted on the 21st July 2021. Please bear in mind that the deadlines within the permit are important. If there is a delay or problem with the date stated on the permit, please let me know and we can agree on a suitable date for the submission to be made. As for the report itself this is currently being assessed and I will get back to you as soon as I have finished the review. This will be done via e-mail.

Improvement Condition 2 will depend on the submission and review of IC1 and if there are any sensitive receptors within 250m of the site.

Improvement Condition 3 – These are the BAT Conclusions that the site will be required to be compliant with by the 17th February 2021. During the visit we discussed the improvement conditions and how the information will be submitted to NRW. There appeared to be no issues with the information asked in IC3. WWOE stated that their processes and procedures are linked with Welsh Water Dŵr Cymru (DCWW) environmental management system (EMS). As a result of this we have agreed that the best way to submit the information is to link different BAT conclusions that are accosted with the procedure documents WWOE have in place. They will be submitted in batches to allow NRW to review and accept the BAT conclusions, this will also aid in managing the workload and if any queries arise from the submitting, it allows both parties to work on the information.

The site will be submitting the first batch of information shortly to be reviewed. Please let me know when you are thinking of submitting information.

4. Permit Variation

The site has informed NRW that a variation will be submitted to include a new Boiler and a Liquid Waste Tank of approximately 100m³. This is likely to be submitted to NRW's permitting department in the coming months.

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5. Actions from previous CAR

There is still an outstanding action from CAR_NRW003716 relating to the odour abatement unit. The action is as follows:

Action: Please provide NRW with an update on proposed actions following the review of the

odour abatement unit.

Please can you provide an update on this.

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6. **Waste Returns**

On the 13th July 2021, the quarterly returns were submitted to NRW. These have been reviewed and accepted. This is in line with the permit conditions and is compliant.

7. **Conclusion**

Overall, there were no significant issues noted, and arrangements appeared to be well managed.

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.