

Compliance Assessment Report

Report ID:
CAR_NRW0032201

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

Site	Magor Brewery EPR/BX7282IS	Permit Ref	BX7282IS		
Operator/Permit holder	AB InBev UK Ltd				
Regime	Installations				
Date of assessment	07/09/2017	Time in	12:00	Out	14:30
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Annual returns				
Lead officer's name	Willey, David				
Accompanied by					
Recipient's name/position	Carl Rogers/ ES Manager	Date issued	26/09/2017		

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
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4	5

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

ABInBev – site visit 7th September 2017

Actions carried forward from CAR Form issued on 3rd May 2017

ACTION: The permit variation needs to address the following:

1) After discussions on site there are a few scenarios that need to be considered:

a) the new Flu-Ace running independently with a small flow going through the existing stack (normal operating scenario)

b) the new Flu-Ace and the existing stack both running at 50% (if applicable)

c) a comparison of the old process and the new process demonstrating impact

2) The assessment needs to consider the new emission point with associated Emission Limit Values (ELVs). The impact from the existing stack will remain the same as currently permitted and will serve as backup in case the FLU-ACE fails.

3) Consideration needs to be given to the height of the new stack and its effect on dispersion. The temperature at the point of emission will be reduced but with the forced flow should provide adequate dispersion. This needs to be demonstrated through a risk assessment. An assessment for deriving stack height has been undertaken but has not followed the requirements of H1.

4) The stack needs to have appropriate sampling ports in line with the requirements of M1.

ACTION: Confirm whether the process will be direct or in-direct heat recovery. If direct how ensure water quality is clean enough for the process.

ACTION: With the permit variation a revised site boundary should be submitted to include the new storage areas and any other changes that may be in the pipeline.

Actions carried forward from CAR Form issued on 12th December 2016

ACTION: ABInBev to install safety barriers alongside the road to prevent potential accidents from moving traffic near to the HCL tank. If the Operator does not propose to install safety barriers please supply suitable justification.

ACTION: Update the AMP in line with the appropriate tank specifications for the different chemicals stored on site.

ACTION: Update the AMP to include notification to NRW of any incidents.

ACTION: Provide a copy of the maintenance programme in place at ABInBev as required by condition 2.3.6.1. This can form part of the AMP or a standalone Preventative Maintenance Plan.

ACTION: Phone numbers to be updated in the Accident Management Plan.

ACTION: ABInBev to incorporate the inspections undertaken by Flexible Solutions into the sites EMS / PMP with associated proformas.

ACTION: ABInBev to demonstrate how the sites EMS has been amended to incorporate SUEZ and their ways of working.

ACTION: ABInBev to confirm the procedure undertaken for the monitoring of BOD5 weekly composite in line with SCA Blue Book 130 ISBN 0117522120 and, where there are deviations from this method, provide justification. This will include the time between the sample being taken and the analysis beginning.

ACTION: ABInBev to provide spill kits and consider alternate arrangements to delivering the chemicals to the building. If this is not practicable procedures should be in place to minimise the time the chemicals are stored in this area with associated measures to avoid release to surface water drains.

ACTION: ABInBev to provide the results of the monitoring undertaken upstream of discharge point W3 from the day of the incident.

Meeting on 7th September 2017

David Willey met with Carl Rogers who is the new ES Manager at ABInBev replacing Kathryn Fowler and Beverley Jenkins. Carl is now the contact for EPR permit requirements as well as the RSR permit requirements.

Contact details are:

Tel: 07768 500075

E-mail: Carl.Rogers@AB-Inbev.com

An overview of the outstanding actions was discussed with NRW forwarding recent CAR Forms as well as the outcome of the previous air and water OMA assessments. The permit requirements were also discussed with the following table representing what is required by the permit and the subsequent variations. All returns need to be sent to the Regulatory Assistant Liz Parr at Elizabeth.Parr@cyfoethnaturiolcymru.gov.uk

Condition		What	When
2.4.1.2	Efficient use of raw materials	Waste and water minimisation audit	Every 4 years
2.7.1	Energy Efficiency	Report	Annually
2.8.1	Accident prevention and control	AMP review	Every 2 years
2.11.2	Closure and commissioning	Site Closure Plan review	Every 4 years
4.1.3	Reporting	Report	Annually
4.1.4	Reporting	Fugitive emissions review	Annually
4.1.5	Reporting	EMS targets	Annually
4.1.7	Reporting	SPMP	Every 2 years
Table S2	Monitoring	A1,A2,A3,A4	Annually
Table S2	Monitoring	A5, A6	6 monthly
Table S2	Monitoring	Hydrogen Sulphide	
Table S2	Monitoring	W2	Quarterly
Table S2	Monitoring	W2	Annually
Table S4.1	Annual production		
Table S4.2	Performance parameters	BOD, COD	Annually
Table S4.2	Performance parameters	Water, energy, co2, waste	Annually

Carl discussed a recent increase in the temperature of the discharge at emission point W2. The limit is 30°C as specified in Table 2.2.5 of variation EPR/BX7282IS/V006. This occurred on the 19th July 2017 reading 31.8°C with readings increasing in the two days before and staying raised for the day after before returning to normal operating conditions.

ACTION: ABInBev to complete and submit the Schedule 1 notice informing NRW of abnormal operating conditions. This should include the outcome of the investigation undertaken.

Data was also submitted reflecting increases on the 19th, 20th, 21st and 22nd June. SCADA data also appears to have been lost. SUEZ are looking at the instrumentation to ensure there are no issues with the kit or with the processing of the signal in the SCADA system.

ACTION: ABInBev to confirm whether there has been any data lost from the SCADA system.

Investigations are currently ongoing with the hot liquor tank being identified as the suspected source. CAPEX has been secured to replace this tank. A new glycol chiller has been installed and is located at the onsite ETP that reduces the temperature from 55°C to 18°C prior to discharge to the offsite ETP.

ACTION: NRW and ABInBev to agree date for the next OMA for water. An OMA is required due to the effluent treatment plant now being managed by SUEZ.

Emission point W4 was discussed, this emission point discharges uncontaminated surface water from the brewery site directly to the Waundeilad Reen. At present the site only uses this discharge location in extreme rainfall events and is not routinely used. Monitoring is undertaken prior to any discharge from W4 for pH, TOC, and COD. This monitoring is undertaken every 15 minutes.

ACTION: Please could ABInbev provide details of the standard operating procedure for the agreement for the discharge to the Reens from the Brewery W4 discharge point.?

Annual returns for 2016

There is no requirement for ABInBev to submit pollution inventory anymore to NRW. There is a requirement to submit the annual E-PRTR as well as PRN. The following comments have been made to the received submissions.

Form A1 - No comments

Form A2 - Emission point A8 presents a breach of the oxides of nitrogen limit of 500mg/m³ with a measured value of 548mg/m³. It appears that this monitoring was repeated in November due to the quality of gas and engine cutting out during the testing.

ACTION: ABInBev to clarify whether the 548mg/m³ value should be considered for assessment. If so, please provide suitable evidence of this from the monitoring company.

Form E2 - NRW do not appear to have previous data for electricity and heat generation.

ACTION: Please could you supply these to NRW?

Form Gas 1 - The result obtained during this monitoring round was 200ppm against a hydrogen sulphide maximum concentration is 200ppm.

ACTION: Please could ABInbev expand on this reading and the typical readings associated with the monitoring. Measurement is continuous so trending should indicate typical levels. For these measured levels a Schedule 1 Notification form should be submitted to NRW.

Form W1 - No comment.

Form R1 - Waste has increased from 19948 tonnes in 2015 to 20367. Is this due to increased production as discussed in E1?

Form WU1 - No comment.

Form E1 - Energy usage has increased due to an increase in the production of Budweiser that requires a more energy extensive mix. This has led to an increase in the amount of CO₂ produced from previous years, 35095 in 2015 and 64119 tonnes in 2014. CAPEX initiatives have been identified as part of the EMS documentation.

Form PI1 - NRW only have data for 2016 for the annual production.

ACTION: Could ABInBev supply previous years' data to allow for trending?

Environmental Performance Indicators show good performance for water usage and water discharge with an increase for energy usage and therefore CO₂ release as a result of the energy intensive Budweiser production.

Form MR1 - No comment.

Fugitive emission plan

An updated fugitive emission plan was submitted to NRW. The plan remains relatively unchanged with notes where changes have been made in 2016 and for 2017. The plan identified cereal dusts as being disposed via deep trench burial.

ACTION: Please could ABInBev confirm that the cereal dust is disposed or undergoes some sort

of recovery treatment. The EMS states zero waste to landfill indicating that there is no final disposal of any waste streams.

The plan states that there have been no significant discharges of ammonia and that all R22 units have now been removed from site and replaced in 2015. In 2016 1.5kg of R407C gas was topped up leading NRW to believe that there has been a release to atmosphere. Due to the global warming potential of the R407C gas an equivalent 2661kg carbon dioxide would be released. (Based on a GWP of 1774 for R407C multiplied by 1.5kg).

ACTION: Please could ABInBEV confirm what methods are in place to record refrigerant loss and what reporting mechanism is in place to identify and quantify any releases.

The plan states that a biogas driven boiler was trialled in 2016. If this boiler is considered an option at the ETP then a permit variation would be required. The Volute Screw Press is also fully operational, NRW would be interested in visiting this and from having further details of the environmental benefits this is having at the site. The offsite ETP is also having a feasibility study for the installation of MBBR (Moving bed biofilm reactor) technology.

Environmental Management System

ABInbev continue to use their in-house management standard Voyager Plant Optimisation with the culture of continuous improvement.

There are ten energy saving projects identified for 2016 all with substantial costs associated with them. Many KPIs are listed within the EMS covering all aspects from incoming fuel to waste recovery. As part of the continuous improvement culture at the site twenty five projects have been allocated CAPEX for 2017

Ongoing projects that are of importance include the restoration of the integrity of the storm water and waste water drains as well as the bund repair project.

Some of the work undertaken in 2016/17 includes the centralisation of the chemical storage area and the replacement of the bulk sodium hydroxide tank.

Returns submitted for 2017

Form W1 - No comment.

Form A1 - Site to consider removing emission points A5 and A6 from the permit during the next permit variation.

Permit breaches

As indicted in previous CAR Forms the site should be informing NRW using the 'Schedule 1 - Notification of abnormal emissions' form found in Schedule 1 of the permit. **This has been considered a Category 4 breach of permit conditions under section 5 Notifications.** In this instance the level of impact to the environment was minimal. NRW also understand that there has

not been an ES manager in place during this period who would respond to these incidents.

Further breaches may be identified as a result of the responses to the actions in the CAR Form.

End.

EPR Compliance Assessment Report

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CAR_NRW0032201**

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Site	Magor Brewery EPR/BX7282IS	Permit Ref	BX7282IS
Operator/Permit holder	AB InBev UK Ltd	Date	07/09/2017

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			
G4	C4	Report using the Schedule 1 form	31/10/2017

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.