

Compliance Assessment Report

Report ID:
CAR_NRW0023766

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	16/03/2016	Time in	09:30	Out	14:00
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Reporting Forms, Permitted Activities				
Lead officer's name	Willey, David				
Accompanied by					
Recipient's name/position	Kathryn Fowler/ ES Manger	Date issued	29/07/2016		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
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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	0	Total compliance score (see section 5 for scoring scheme)	0
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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

CAR Form following site visit on 16th March 2016

The scope of this site visit was to determine the thermal capacity at the site, inspect the newly installed HCL tank and the new storage area to the south east of the installation.

This CAR Form also acknowledges the annual report and returns.

The structure of the CAR Form is as follows.

1. Actions from last CAR Form
2. Thermal capacity confirmation
3. HCL tank update
4. New storage area.
5. Annual report and returns

1. Actions from last Car Form

ACTION: NRW to supply reference documentation to AB InBev to assist in the formulation of the revised AMP. **Completed.**

ACTION: (Carried forward). Update the AMP in line with the appropriate tank specifications for the different chemicals stored on site. **Ongoing.**

ACTION: (Carried forward). Update the AMP to include notification to NRW of any incidents. **Ongoing.**

ACTION: (Carried forward). Provide a copy of the maintenance programme in place at AB InBev as required by condition 2.3.6.1. This can form part of the AMP or a standalone Preventative Maintenance Plan. **Ongoing.**

ACTION: KF to supply a copy of the ZBS Environmental Bill to NRW. **Completed.**

ACTION: NRW to update profile and confirm OPRA score. **Completed.**

ACTION: NRW to update NRW's H&S visitor's sheet in light of KF's comments. **Completed.**

2. Thermal capacity confirmation

As well as being permitted for a Section 6.8 A(1)(d)(ii) activity AB InBev is permitted for Part A(1)(a) combustion activity where there is a thermal input of 50 or more megawatts. Following some correspondence to determine whether IED applied to the combustion activity or not AB InBev were tasked to confirm their thermal input at the site.

The original decision document had the values shown in Table 1 for the units that would bring it over the 50MWth threshold for IED with each unit being over 15MWth for each unit. This is relevant as plants over 15MWth need to be aggregated and would then be subject to IED Chapter III for combustion plants. This in turn requires ELVs to be derived as well as other requirements set out in the Directive.

Table 1: Original application specifications

Combustion Unit	Capacity MWth
No.1 HTHW Boiler	23.1
No.2 HTHW Boiler	23.1
No.4 Steam Boiler	16.7
No.5 Steam Boiler	16.7
Total thermal capacity	79.6

With the information since provided it has been demonstrated that the combustion plant is below the IED Chapter III threshold and the requirements do not apply as two of the units are under 15MWth and do not need to be aggregated for IED.

Table 2: Confirmation that the thermal capacity

Combustion Unit	Capacity MWth
No.1 HTHW Boiler	18
No.2 HTHW Boiler	18
No.4 Steam Boiler	4.06
No.5 Steam Boiler	7.1
Total thermal capacity	47.16

During the visit evidence was provided for the thermal capacity of the boilers and are shown in the following figures.

Figure 1: No.1 and No.2 HTHW Boiler – both 18MWth

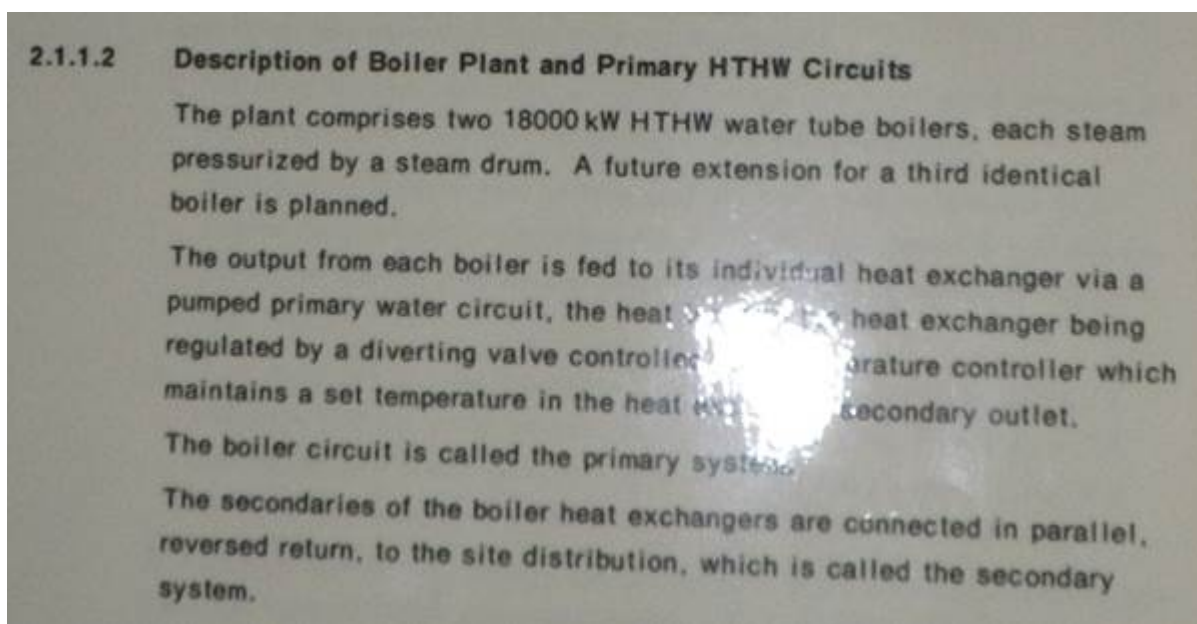
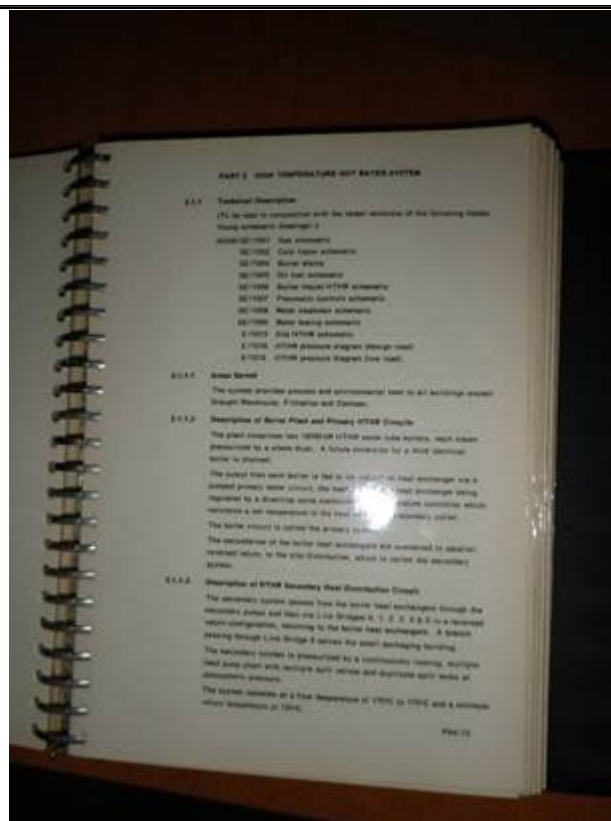
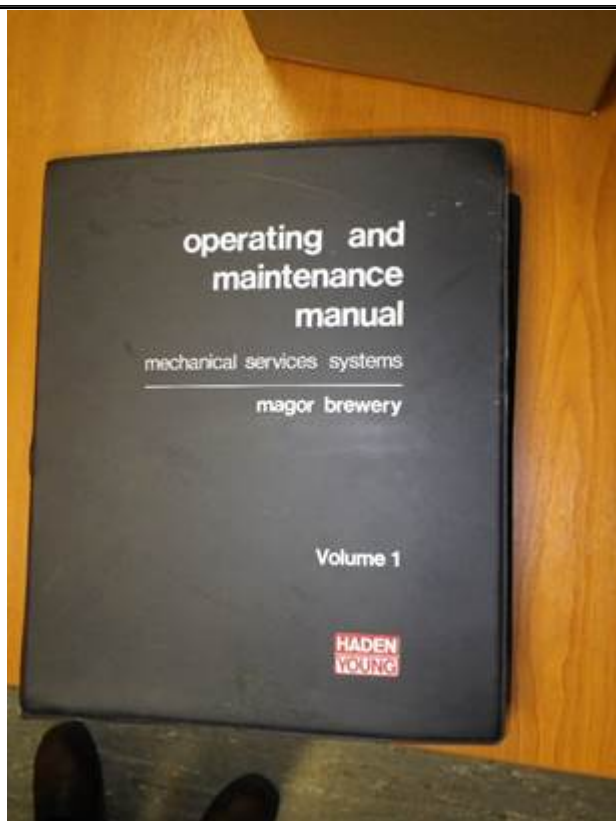
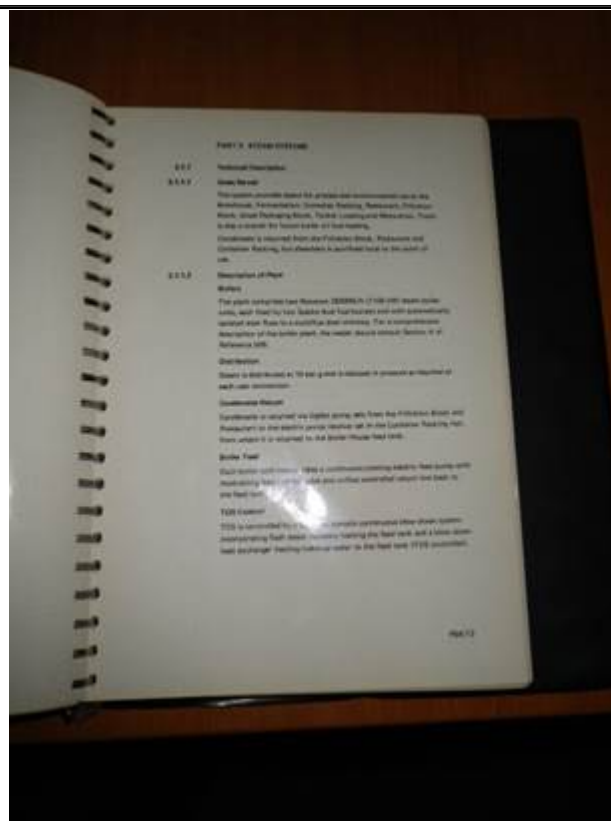
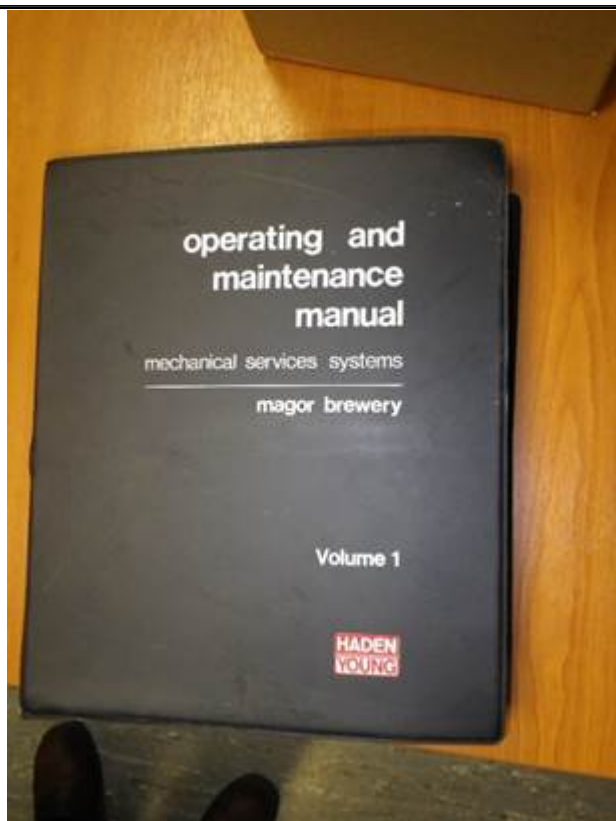


Figure 2: No.4 Steam Boiler – 4.06MWth

See document referenced 'Order confirmation 6.pdf.' where it states a Gross thermal capacity of 4066kw.

Figure 3: No.5 Steam Boiler – 7.1MWth



3.1.1.2

Description of Plant

Boilers

The plant comprises two Maxecon 25000lb/h (7100 kW) steam boiler units, each fired by two Saacke dual fuel burners and with automatically isolated steel flues to a multiflue steel chimney. For a comprehensive description of the boiler plant, the reader should consult Section A of Reference 509.

IED has brought in some requirements for plants that are over 50MWth (only aggregating units over 15MWth) and these have had to undergo permit changes as well as having additional requirements imposed on them. The Medium Combustion Plant Directive brings in the requirements for sites between 1 megawatt and 50 MWth, but not until 2025 for existing sites. AB InBev should be aware of the MCPD and the resulting Emission Limit Values.

3. HCL tank update

Figure 4: Newly installed HCL tank



The old HCL tank and associated infrastructure has now been completely removed. The newly installed tank is doubled skinned and designed for the safe storage of HCL.

ACTION: AB InBev to install barriers alongside the road to prevent potential accidents from moving traffic.

4. New storage area

AB InBev have constructed a new storage area, Project Galileo Stage 2, to the south east of the site that will include a tented warehouse structure with associated loading bays, access roads, areas of hard stand and retaining walls. AB InBev applied for an admin variation but the change has been considered to be a normal variation. Based on the cost of a normal variation and the fact that AB InBev will be applying for a variation in the future this CAR Form acknowledges the increase of the site boundary (referenced, 'Project Galileo Site Plan 2016 P1.pdf') that will be incorporated into the permit once varied.

5. Annual report and returns

The following returns have been received with the resulting comments:

Accident management plan

The AMP is in the process of being looked at and will likely be revised as changes are made on site. AB InBev are reviewing all site chemicals in line with new classifications under CLP.

Fugitive emissions control

2015 saw four new 60 tonne silos installed at the site, silo 42 for rice and silo 50, 51 and 52 for maize. A biogas driven boiler may be trialled in 2016 to negate the requirement to flare to atmosphere.

Reporting Forms

Form W1 for the period 30th September to 31st December 2015– all compliant

Form W1 and 1st January to 31st March 2016 – all compliant

Form A1 – A5 not running, all other pollutants are within their respective ELV

Form A2 – One breach of the Carbon Monoxide limit for emission point A8 of 679mg/m³ against the emission limit of 650mg/m³ during the March monitoring round. Taking into account the measured uncertainty the value is calculated below the ELV.

Form E2 – Energy generated at the site has increase from 2014, 1779MWh in 2015 compared to 1271MWh in 2014 and associated heat generated increase from 1670MWh in 2014 to 2338MWh in 2015.

Form WU1 – water usage has declined with CAPEX identified for further reduce water usage in a sustainable manner

Form E1 – CO₂ produced has shown an increase on the previous 2 years, this reflects the higher energy use on site in 2015.

Form PI1 – Form indicates in a reduction per tonne of product for water use, energy use, CO₂ and waste. These figures demonstrate the ongoing progress at AB InBev for energy efficiency.

Form MR1 – Zero kg/annum reported.

Form R1 – no comments.

Gas1 for the period 1st July to 31st December 2015. Value of 97ppm reported, this shows a good reduction from the previous values.

Annual EMS – identifying key environmental initiatives for 2016 being:

- The restoration of the integrity of storm water and waste water drains
- planned repairs to reinforce concrete bunds, replacement of single skinned and bunded tanks to double skinned
- update the environmental critical equipment list in SAP
- Liaise with the new compliance manager for key project implementation
- BTS control and optimisation.

AB InBev were nominated for Best Practice for their ESOS Compliance Project with AB InBevs approach to the ESOS compliance displaying a good mix of:

- Proactive planning (early kick off and nomination of a Lead Assessor in April 2015)
- Greta support from staff throughout the organisation

- Senior management buy in into the project
- Great enthusiasm to make the most of the audit results.

Other projects completed in 2015 include:

- Installation of a volute dewatering press to reduce the water content of the digestate removed from the site.
- ESOS with Capex of 1.35 million US Dollars for Magor Brewery.
- CO2 recovery
- Project Galileo Stage 2
- Installation of a biogas boiler to heat treated effluent.

The effluent treatment plants contract is up for renewal and are awaiting a decision to be made of the preferred bidder. Also up for renewal is the waste management contract.

AB InBev also participated in World Environment Day on the where they improved the garden facility in the Usk Town Hall.

End

EPR Compliance Assessment Report

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Operator/Permit holder	AB InBev UK Ltd	Date	16/03/2016

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.

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			

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 reports should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty 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.