

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

Site	Cardiff CHP Facility EPR/FP3232KG/V002	Permit Ref	FP3232KG		
Operator/ Permit holder	Dwr Cymru Cyfyngedig (Welsh Water)				
Date	01/02/2018	Time in	10:00	Out	13:40
What parts of the permit were assessed	See main text				
Assessment		EPR Activity:	Installation: X	Waste Op:	Water Discharge:
Recipient's name/position	Andrew Dixon / Luis Priegue				
Officer's name	Toby Griffiths	Date issued	07/02/2018		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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			Condition(s) breached
a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	A	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk), A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, 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 Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Visit of 1st February 2018

Keith Harris, Gavin Stephens, Luis Priegue, Leon Jones (DCWW)

Introduction

A routine visit was arranged to review compliance on site. There have been no significant changes, although there has been some harmonising of site management, including staff changes. No odour complaints have been received recently. Engine performance has been greatly improved since the installation of the siloxane plant. Composite boilers A4, A5 and A6 are mainly used for steam raising for the Cambi process.

Permit charges

In recent years, DCWW have not been charged for the installation permit due to changes in the regulations. However, as NRW has begun regulating the site again, charging will recommence. NRW will forward the historical OPRA profile and the new OPRA spreadsheet for DCWW to complete. The annual subsistence fees will be calculated based on the OPRA score and NRW will arrange for invoicing to begin again.

Health and Safety

As part of its review of site health and safety requirements, NRW queried the DSEAR arrangements on site. The main areas visited for regulatory purposes, do not require specific flame retardant PPE or intrinsically safe equipment. Mobile phones are not permitted, and a gas alarm is used in certain areas. For completeness DCWW agreed to forward the zone map to NRW. NRW also has gas alarms which can be worn when visiting site.

Schedule 5 reporting

DCWW sent Schedule 5 Part A form on 13th February 2017 in relation to the failure of an alternator, meaning the engines had to be shut down. This caused the flare to operate for longer than usual. A comprehensive incident review including root cause analysis was received by NRW on 1st February 2018. The fault was identified, and pre-emptive repairs have been carried out across the DCWW assets. If the flare operates above 10% of the time annually, the permit requires monitoring to take place. Some monitoring was undertaken and submitted on the 19th April 2017 with the Part B notification. However, only a CO result of 571.99mg/m³ was submitted. Other determinands are required under Table S3.1 (NO_x, CO, SO₂, temperature). The CO result exceeded the permitted limit, which may be a permit non-compliance. NRW will need further information before responding formally.

Action 1: Please forward the complete monitoring information for A7 (flare) as required under Table S3.1 (NO_x, CO, SO₂, temperature). Please include the monitoring report from the MCERTS/UKAS accredited contractor.

Site Tour

A brief site tour was undertaken, including the Cambi reactors, gas engines and siloxane plant. An IBC of hydraulic oil was seen stored outside, albeit on concrete which drains to the foul system. It is best practise to store the oil inside within a bunded area. DCWW confirmed that the IBC was due to be moved inside to the usual storage area. The exhaust system of engine number 2 was corroded and lagging was exposed. This was scheduled for repair and the engine was off line.

Emissions to air

During the visit, the Air 1 form for 31/01/2018 was viewed and results were compliant. However, it was noted that the incorrect ELV for CO was listed. This should be 1100mg/m³, rather than 1400mg/m³. DCWW confirmed that this will be amended on the forms and re-submitted. *[This was received by email on 01/02/2018]*

Table S3.4 – Process Monitoring

Process monitoring includes the measuring of methane, hydrogen sulphide, gas flow (flare), leak detection (gas holders). DCWW confirmed that these parameters are routinely monitored. Table S3.4 includes Note1, which requires the arrangements to be agreed in writing with NRW.

Action 2: Please confirm the process monitoring arrangements for methane, hydrogen sulphide, gas flow (flare), leak detection (gas holders), including the equipment, monitoring standards/methods and frequency (i.e. how often they are carried out).

Medium Combustion Plant Directive (MCPD)

The potential changes brought about by the MCPD were briefly discussed. The changes, including emission limit values, will not be implemented for some time (2030). The potential ELVs were discussed, however, reference conditions, particularly the oxygen correction, will be a significant factor. Further discussions will be arranged as required.

Table S1.3 Pre-Operational Conditions

There are two pre-operational conditions. some documents were received in 2012, however due to the changes in the regulatory regime NRW requests that updated documents are submitted.

Action 3: Please submit updated documents for the pre-operational conditions in Table S1.3.

Please respond to the actions by **9th March 2018**.

END

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Operator/ Permit	Dwr Cymru Cyfyngedig (Welsh Water)	Date	01/02/2018

Section 3- Enforcement Response **Only one of the boxes below should be ticked**

<p>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.</p>	
<p>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.</p>	<input type="checkbox"/>
<p>In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.</p>	<input type="checkbox"/>
<p>We will now consider what enforcement action is appropriate and notify you, referencing this form.</p>	

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above		Please respond to the 3 actions in the main text	9 th March 2018

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 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 the officer's line managers. 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.