

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

Site	Afan Combined Heat And Power Facility	Permit Ref	ZP3032KQ		
Operator/Permit holder	Dwr Cymru Pentwyn Road				
Regime	Waste Operations				
Date of assessment	09/01/2018	Time in	10:00	Out	12:00
Assessment type	Audit				
Parts of the permit assessed	1.1.1, 4.3.1, 3.5.3, 1.1.3				
Lead officer's name	Thomas, Ffion				
Accompanied by					
Recipient's name/position	Andrew Dixon/ Energy Operations Manager	Date issued	16/02/2018		

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	4.3.1

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

This Compliance Assessment Report (CAR) form has been completed following the site visit that was undertaken by Ffion Thomas on the 9th January 2018.

Attended by:

Andrew Dixon – DCWW Energy Operations Manager

Luis Molinos Priegue -DCWW ?

Keith, dean, Chris? – site operatives

Sorry I did not note down all names, please could you confirm those present and their roles.

Agenda:

Outstanding actions from previous CAR forms

Discussion regarding recent notification of engine failures.

Maintenance procedures and schedules

MCERTS certification

Staff competency and training records

AOB – upcoming/future changes.

Outstanding actions from previous CAR forms

During the process of planning the compliance visit to Afan a look back over some of the previous CAR forms found an outstanding action to submit an updated Environmental Management System (EMS) and associated relevant procedures.

A copy of the EMP was submitted on 18th December 2018.

In addition to this a copy of the annual inspection against the management plan was submitted. This annual review did not identify any significant changes to the plan being required.

Discussion regarding recent notification of engine failures.

Further to the email sent on the 18th December 2017 to arrange a site visit a phone call was received informing NRW that CHP engine number 2 had been taken off line due to an exhaust issue. It became apparent that this malfunction had occurred back in July following planned maintenance. The below clarification was provided.

CHP#2 went away on 19th July, expected back in September 2017 with plenty of time for us to test our emissions. We subsequently had many challenges with the engine cylinders showing excessive wear and the alternator requiring a full re-build due to build-up of iron from the adjacent steel works. The engine #2 eventually came back into service on 02/11/2017. Afan #2 then suffered an issue with the exhaust on 29/11/2017 which has resulted in the site staff and myself agreeing we will not operate the engine until the completion of a process investigation, for which I have appointed Rowan house to undertake for us. We began this investigation with a site meeting on 12th December and are now working to understand the fault before the CHP returns to service.

A schedule 5 notification was submitted on 18/12/17.

A further notification was received on 8/1/18 with an accompanying email detailing:

In advance of meeting at 10:00 tomorrow, please see our latest update on site. We have currently got both CHP engines out of service as there was a further exhaust issue on boxing day.

Condition 4.3.1 requires notification within 24 hours of detection. Both notifications were late in their submission by several days from detection.

Investigations were being undertaken and there were no emission breaches.

You are reminded to ensure you meet and comply with the reporting timeframe. An A&G note has been assigned to this CAR and breaches of late reporting notification as per condition 4.3.1 schedule 5 part A recorded as a Cat 4.

Whilst on site we discussed the situation. It was confirmed that the boilers were fully operational and had received all gas flow so no flaring had occurred.

The investigation into the engine failures continues, it is currently unclear as to why the exhaust failures have occurred.

I'd appreciate being kept informed regarding the investigation works being undertaken regarding the engine exhaust, but understand this will take time and remind you of the need to complete part B of the scheduled notification once the information is available.

If there are any issues regarding the boiler efficiency during this investigation time please inform us via a schedule 5 notification.

Maintenance procedures and schedules

During the site visit a conversation was held regarding the sites maintenance schedules. The site operatives were able to give an account of the works undertaken.

A request was made for confirmation of the maintenance procedure and evidence of maintenance schedules and any works recently undertaken (e.g. siloxane medium replacement) was requested.

Details were forwarded via email dated 31st January 2017.

The email contains records of maintenance schedules undertaken by the sub-contractors Edina. Review of these schedules relate to works undertaken in 2016, but also includes a summary of findings and actions to be taken.

Staff competency and training records

During the site inspection discussion was held regarding on site staff competency. Staff were quizzed over their operational knowledge and personal records of their certification and training were viewed.

Follow up documents of the staff training records were also supplied via email on the 31st January 2017. Personal details were redacted.

MCERTS certification

A copy of the Environmental Consultants Ltd MCERTS report and findings have been received and show that the monitoring of emissions to air from both CHP and Boilers have been audited.

A copy of the certificate is also requested.

AOB

- A request is made for an Electronic version of site layout drawing (as seen on control room wall)
The following response is noted: [Will compile these along with the Siloxane Removal system reports and issue ASAP.](#)
- Any comments you wish to make that show continued operator improvements e.g. any ISO accreditations achieved/working towards.
[DCWW recently undertook a BSI audit at Afan WwTW. As mentioned during the site visit, a procedural non-conformance was identified for legionella testing on hot water hand washing facilities. This was the only item identified and DCWW will update on progress should accreditation be successful. This is administered by the IMS team.](#)

Additional information:

T21 exemption – During the site visit DCWW were advised to consider reviewing the applicability of the T21 exemptions registered for the AD activity on site. It is understood that joint meetings are to take place between water quality departments in NRW and DCWW so until this is completed I am unable to offer further comment at this time.

MCPD advice The site may wish to consider implications of the changes to the medium combustion plant directives.

END

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0032916**

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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			
G4	C4	You are reminded to ensure you meet and comply with the reporting timeframe. An A&G note has been assigned to this CAR and breaches of late reporting notification as per condition 4.3.1 schedule 5 part A recorded	28/02/2018

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 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.