

Company Director/ Company Secretary
Newbridge Energy Ltd
Blazers Fuels
Brickfield Lane
Denbigh Road
Ruthin
Denbighshire
LL15 2TN

23 December 2021

Dear Sir/ Madam,

**RE: Company response to Environmental Permitting (England and Wales)
Regulations 2016 Statutory Notice- Regulation 36 (served 24.09.21).**

We have reviewed the information provided by Newbridge Energy Ltd in response to the statutory notice referenced above (Steps 1-5).

We are satisfied that the following steps of the notice have been met:

1) Fuel for the CHP Biomass Boiler shall only be accepted on site and used in the CHP Biomass Boiler if it is listed in the environmental permit (Virgin woodchip and untreated waste wood listed in Schedule 2 Table S2.1), free of contaminants and conforms to the manufacturer's specifications (Uniconfort biomass boilers and CHP plants, Combustor standard, E, Manual for Installation, Maintenance, Storage, ED03/2017-nev.00).

2) Remove all fuel for the CHP that is stored at the site that is not authorised by the environmental permit, contains contaminants, and does not conform to the manufacturer's specifications (Uniconfort biomass boilers and CHP plants, Combustor standard, E, Manual for Installation, Maintenance, Storage, ED03/2017-nev.00).

The removal should specifically include the fuel material stored in the first outside fuel bay on 20.09.21 which contained contaminants including plastic, rubber and electrical wires. Ensure this material is taken to a site authorised to accept it and completed duty of care documentation e.g. waste transfer notes are provided to NRW by the date specified.

3) Ensure the fuel mix for the CHP Biomass Boiler is stored undercover in line with SOP Fuel Blending (BFLSP-SW-010-001SOP006 April 2021 Issue 1).

4) Ensure staff follow the site EMS and relevant SOPs including Material Acceptance (BFLSP-SW-010-0013OP004 Issue date 24.03.21 Issue number 1) and Waste acceptance, pre-acceptance and rejection procedure (NBEP038, 19.04.21).

Although a response to all of the steps in the notice (1-5) was provided by Newbridge Energy Ltd to NRW, we do not believe that your response to step 5 (a, b and c) adequately satisfies the requirements of the notice.

We require you to provide evidence that step 5 (a, b and c) has been achieved:

a) During normal operating conditions exhaust gases from the combustion unit shall be abated via the installed fabric filter (bag house) to comply with the Emission Limit Value of 50mg/Nm³. (Your response should include, but not be limited to, an explanation of the linkages between the CHP unit and abatement. Confirm how abatement of gases is ensured and any circumstances where they are not. Provide evidence to support this response)

b) The fabric filter shall be maintained in good operating condition. (Your response should include, but not be limited to, the fabric filter maintenance regime- Planned Preventative Maintenance (PPM) schedule in accordance with manufacturers recommendations)

c) The performance of the fabric filter shall be monitored during plant operation using suitable process monitoring techniques (including but not limited to filter differential pressure) and reviewed at least hourly by a suitably competent process operator. Where process monitoring data indicates a deterioration in filter performance that may lead to, or is likely to be causing an emission limit value exceedance, then an investigation shall be carried out immediately by suitably competent personnel and remedial measures taken to prevent and where that is not possible, minimise an emission limit breach. (Your response should include, but not be limited to, more detail regarding how abatement is monitored, who carries out the monitoring, staff training, what parameters staff monitor, operating procedures, what actions staff take in the event of an alarm/ malfunction, incident investigation procedure)

Please provide evidence to demonstrate that step 5 (a,b and c) has been achieved by 27.01.22. 17:00hrs.

The information must be sent in writing to Jamie Blythin at:

north.wales.ppc@cyfoethnaturiolcymru.gov.uk

Yours faithfully

Jamie Blythin
Senior Officer, Industry Regulation Team North East

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jamie.blythin@cyfoethnaturiol.cymru.gov.uk

Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English