

Compliance Assessment Report

Report ID:
CAR_NRW0033344

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

Site	Mona Anaerobic Digestion Plant	Permit Ref	AP3033HY		
Operator/Permit holder	4 D AD Services Ltd				
Regime	Installations				
Date of assessment	29/03/2018	Time in	10:00	Out	14:00
Assessment type	Site Inspection				
Parts of the permit assessed	Various				
Lead officer's name	Ross, Stuart				
Accompanied by	Roberts, Anthony				
Recipient's name/position	Adam Archer/ Plant Manager	Date issued	15/05/2018		

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
A1 - Specified by permit	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
C2 - General Management - Management system and operating procedures	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	

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

This Compliance Assessment Report follows a routine site inspection to review plant operations and progress in rectifying faults with the site surface water drainage system and in particular the silage clamp leachate drains and associated gully pots.

1. Site Drainage

During the inspection the leachate drainage system was in the process of being grouted with cement from end to end (two empty clamps) . All gully pots within the clamps have been permanently removed and the surrounding tarmac cut back approx. 0.5m in each direction, pending a permanent repair following grouting works. It was reported that some foul smelling material was excavated around some of the gully pots indicating a possible pollution pathway to ground.

The interface between the tarmac and concrete clamp walls has been sealed with bitumen, in places a significant quality bitumen reportedly ran into the joint indicating a void and another potential pollution pathway. The tarmac surface of the clamps was in good condition and core samples have been collected to assess its integrity/permeability. The remedial works described above are to be repeated in the remaining clamp once it has been emptied of silage. Please inform NRW when the remedial works have been completed. As discussed it would be beneficial if you can take photographs of the works before the clamps are refilled.

Non compliance related to the escape of leachate to ground has been dealt with though previous reports.

The surface water lagoon and receiving watercourse were inspected and both appeared to be clean and uncontaminated. The lagoon was partially full, no discharge was occurring. The lagoon is tested for ammonia prior to discharge and only released if it is in line with the permit requirements. Records of discharges and ammonia concentrations are maintained in the site diary - inspected.

It was reported that a drainage solution to prevent the ponding of surface water in the AD tank bund area is being explored. Any changes to the bund floor should be discussed with NRW before work proceeds, it is possible that this may require a permit variation and could be included in the potential application for phase 2 as detailed in the point below.

2. Phase 2

Phase 2 is not operational and the process design is under review with a number of changes likely to be required to allow it to operate as intended and to meet the requirements of PAS110. Any changes to the design of phase 2 (e.g. new tanks, secondary containment etc.) may require a permit variation and we therefore recommend that you contact us when you are clear as to what changes are required.

3. Odour Control

The solid waste (chicken litter) building is now in use and the odour control unit was operational. There are some gaps in the wall of the building where odour control pipework enters / exits the building and these should be filled to improve the influence of the odour control system, particularly when the access doors are open. The odour within the building was relatively minor and no chicken litter odour was observed outside

on the yard areas.

The unit operates 24hrs a day, 7 days a week with the blower operating at a fixed speed. It is recommended that you investigate (and implement as appropriate) whether there are any opportunities to save money and reduce energy usage, by for example, reducing the fan speed when the building doors are not open. Any changes to the system must not lead to an adverse environmental impact.

ACTION - The odour control unit is currently subject to ad hoc checks to ensure it is operational but a more rigorous system needs to be implemented to ensure that regular checks are completed on the fan, pipework, air flows, filters, lamps and other components as recommended by the manufacturer. Parts of the system may require regular cleaning given the dusty environment it is serving.

ACTION - Critical spares for the odour control unit should either be held on site (e.g. replacement fan and lamps) or be readily available at short notice from the supplier.

ACTION - Daily odour checks are completed by site personnel at the site perimeter, but none are completed off site. Given the height of the tanks and buildings on site, odour could travel beyond the site boundary undetected and is therefore important that down wind odour checks are completed near sensitive receptors at a sufficient distance away from the site . For example. odour checks could be made in the industrial estate road or along the adjacent B road near residential properties depending on the wind direction. The odour management plan / site procedures should be amended accordingly.

As discussed NRW has agreed to temporarily suspend monthly bio aerosol monitoring pending feedback from NRW on the existing reports as received. We will contact you on this matter separately.

No significant odours were noted during the inspection and very few odour complaints have been received which indicates that existing odour control measures are effective.

With regards the above actions please provide NRW with a summary of the steps you have taken by 31st May 2018. Please forward to Tony Roberts.

EPR Compliance Assessment Report

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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			

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.