

**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	Grays Biogas Limited				
Regime	Installations				
Date of assessment	23/06/2017	Time in	10:00	Out	15:30
Assessment type	Site Inspection				
Parts of the permit assessed	Various				
Lead officer's name	Ross, Stuart				
Accompanied by	Roberts, Anthony, Wright, Paul				
Recipient's name/position	Adam Archer/ Plant Manager	Date issued	30/06/2017		

## 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	
B4 - Infrastructure - Containment of stored materials	A	
C2 - General Management - Management system and operating procedures	A	
F1 - Amenity - Odour	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	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.

<b>Number of breaches recorded</b>	<b>0</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>0</b>
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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

### **1. Site Management Update**

In May 2017 Agraferm was placed into insolvency allowing Grays Biogas Ltd to secure new contracts to allow site construction and finishing works to resume including the Phase 1 drainage, and Phase 2 containment remedial works. It was reported that site re-activation works started last week and will continue for a period of 12 weeks. All outstanding works will now be supervised by permanent on site project management.

During week commencing 5th June 2017, newly appointed contractors and technical specialists were brought to site to review/audit the existing plant infrastructure. Several issues of concern were identified including;

- The SCADA control system (phase 1) was-found to be incomplete with regards to sensor inputs and alarms (including programming issues) that also applies to digester 1 which is in an anaerobic state. The SCADA system is to be overhauled, with new software and programming in place prior any plant commissioning activities.
- Corrosion of heating pipework – affected pipework will be removed from site for shot blasting and reinstalled with adequate protection.

As a result of the SCADA system findings and to minimise any potential environmental impact from operations, digester 1 has ceased to be fed and heated and is being ramped down (residual biogas flaring as necessary) but will be maintained in an anaerobic state. Gas production levels are low and declining, in the unlikely event of digester over pressurisation the relief valve would operate.

**ACTION** – Provide NRW with your programme of works for Phase 1 and 2 remedial works and plant commissioning. Please do so by 14th July 2017.

### **2. Surface Water Drainage / Pollution Prevention**

Discharges from the surface water lagoon (W1) have taken place when water quality met the requirements of the permit – the sampling/monitoring procedure and associated records were inspected – no issues noted. The lagoon penstock is kept closed and only opened if water quality meets the permit requirements. When it is deemed that a discharge cannot occur, contaminated surface water is pumped back to the site for storage pending removal for land spreading (deployment) or storage pending plant commissioning.

It was reported that organic contamination continues to be found in a drainage leg (incorporating a French drain) that runs between the installation boundary and Holyhead Truck Services that has now been isolated from the site's surface water drainage system. Investigations by NRW officers identified activities at Holyhead Truck Services that may be causing contamination of the drain and they have been required to implement various pollution prevention measures (ongoing). Grays Biogas / 4DAD intend to complete a ground investigation to verify the source (refer comment below).

The operator also reported that during a recent heavy rainfall event, a significant volume of groundwater was observed entering the surface water manhole chamber immediately upstream of the surface water lagoon (via the chamber sidewall). Testing of this water identified ammonia in excess of 10mg/l, the source of which is unknown. Potential but unconfirmed sources of ammoniacal nitrogen may include historical ground/land contamination, the activities of local businesses or the release of pollutants from the AD plant (slurry/silage liquor). As part of the remedial works to the phase 1 drainage system, Dawnus are to seal the manholes to prevent groundwater ingress.

Grays Biogas / 4DAD intend to complete a ground investigation to identify the contamination source(s) by installing shallow monitoring wells at specified locations around the site perimeter. The ground investigation proposal was provided to NRW and our Geoscience Team will provide comment as soon as possible.

However, we do not object to you proceeding with the investigation ahead of receiving comment from NRW based on the advice you have received from your consultant. We do have some initial recommendations;

- Locate a monitoring well upgradient of site activities to establish background conditions at a sufficient distance away from known potential sources of contamination e.g. the site silage clamps and Holyhead Truck Services site boundary.

- For the analysis of water collected from the monitoring wells, consider GCMS analysis that will aid the identification of the source.

**ACTION** – It was agreed that level data for Digester 1, the leachate collection sump and any tanks holding contaminated water will be reviewed to identify any unusual drop in tank levels / to demonstrate integrity. Submit your findings to NRW by 14/07/17.

Pending the site ground investigation, there is no direct evidence of ground contamination arising from site activities at this time but it cannot be ruled out. If contamination is found to be arising from site activities then remedial measures we will be required.

During the inspection no issues were identified regarding to the storage of liquids in small drums/containers. Site housekeeping was to a good standard, liquids were stored on drip trays/bunds within the 'COSHH' store. There was no visible evidence of any leakage of liquids from the silage clamp or tanks within the bunded area.

### **3. Permit Transfer**

In response to concerns raised by NRW as to who is the 'operator' of the installation, Grays Biogas Ltd propose to submit an application for permit transfer to 4DAD Services Ltd. The application must be supported with your rationale as to why 4DAD Services Ltd is the operator in line with guidance previously supplied by NRW.

As part of any permit transfer, NRW must be satisfied that the transferee (4DAD Services Ltd) is technically competent. For installations this does not necessarily require that site personnel hold CIWM/WAMITAB operator competence certificates although this is clearly beneficial. NRW requires that a transfer application is made as soon as practicable.

**ACTION** – Provide NRW with timescales for the submission of a permit transfer application. Please do so by 14th July.

### **4. Odour**

No significant onsite odour noted.

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0031819**

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Operator/Permit holder	Grays Biogas Limited	Date	23/06/2017

### 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](mailto: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.