

Compliance Assessment Report CAR_NRW0041677

Permit being assessed: AP3033HY.

For: Mona Anaerobic Digestion Plant , held by Anglesey Energy Limited

At: Mona Industrial Estate, Gwalchmai, Anglesey, LL65 4RJ.

Type of assessment carried out: Site Inspection, Reason: Incident Response (Incident number 2300104).

On 14/04/2023 between 10:30 and 12:45.

Parts of permit assessed: 1. 3.1,

NRW Lead Officer: Anthony Roberts.

Report sent to: Ed Bastow, Managing Director on 17/04/2023.

1. Summary of our findings (full details in section 4)

| Part of permitted activity assessed (criteria) | Assessment result | Permit condition |
|---|-------------------|------------------|
| B1 - Infrastructure - Engineering for prevention and control of emissions | Assessed (A) | |
| E2 - Emissions - Land and groundwater | Assessed (A) | |

Result types are explained in more detail in the 'Important Information' section below.

| Total number of non-compliances recorded | Total non-compliance score |
|--|----------------------------|
| 0 | 0 |

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

MONA AD SITE MEETING AND INSPECTION

14-04-23

Present Ed Bastow, Keith Torr (Material Change)

Tony Roberts (NRW)

INCIDENT FOLLOW UP, STAFFING LEVELS, SURFACE WATER, CLAMP AND DRAINAGE ACTIONS**FOLLOW UP TO CAR NUMBER 40918****INCIDENT RESPONSE – WIR NUMBER - 2300104****1. Staffing**

Steve Blease joined on the 01st March. A trained electrician who lives 10m away from site. COMPEX trained for DSEAR and ATEX. A month of training underway and is now doing gas testing and routine sampling. He will now have the maintenance regime for site. A further Admin member of staff has been added 1 day per week. The site is now compliant with permit required staffing levels.

2. Pollution of waterway to Afon Cefni.**Bulleted Summary of Actions and Responses.**

- Drain under clamp is now isolated with sump in place collecting ammonia contaminated drainage.
- Sampling undertaken since January shows little difference between upstream and downstream ammonia concentrations.
- Ammonia has shown a general decrease from highs and the last data set show significantly lower levels.
- Resistivity survey due in May to check for further drainage leaks under and around the clamps.
- This will be conducted by Plandesil, experts in AD design and build and clamp problems. Instruction to Investigate and rectify any issues which may arise.
- Additionally a camera survey will be performed in all relevant pipework.
- Tarmacing contractor to add another course to clamp base if necessary before more feed substrate is added.
- No feed substrate to be paced into clamps until investigation complete.
- Site want to put things right and ensure complainants are satisfied with the response.
- Site surface water results are inconclusive some upstream samples are higher concentrations than the downstream samples. Site will continue to sample until further notice
- Full estate pollution prevention campaign undertaken with NRW Anglesey Environment Management Team and Welsh Water resolving all of the potential inputs to the system on the Mona Industrial Estate. This work is ongoing and NRW will update on findings as necessary.
- Clamp 1 is now empty and a drainage survey will be conducted followed by a radar survey on clamp 1. Clamp 2 will be empty at the end of may and the contractor will do the second

survey before the new crop of rye and barley comes in. Clamp 3 will not be empty until the end of 22nd July this will be surveyed once emptied.

3. **Odour Complaints**

No further odour complaints have been reported to site or to NRW. Chicken farm not in operation so this source of confusion with odour reports has been removed until the farm has been re-stocked.

4. **Permitted Discharge**

- No water has been released from the site since December (pond) water reused back in the process.
- Pond water is crystal clear with little or no ammonia present.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

| Assessment result | Description |
|-------------------|---|
| Assessed (A) | Assessed or assessed in part, no evidence of non-compliance found |
| Action only (X) | Action only relating to the activity assessment |
| Ongoing (O) | Ongoing non-compliance, not scored |

| Non-compliance category | Description | Score |
|----------------------------|---|-------|
| C1 Major | Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property | 60 |
| C2 Significant | Potential to have a significant impact or effect on the environment, people and/or property | 31 |
| C3 Minor | Potential to have a minor or minimal impact or effect on the environment, people and/or property | 4 |
| C4 No environmental impact | Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property | 0.1 |

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.