

Compliance Assessment Report CAR_NRW0042583

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: Site Inspection,

Reason: Other.

On: 06/10/2023 between 10:30 and 12:15.

Parts of permit assessed: 1. Management, 3 Emissions.

NRW Lead Officer: Anthony Roberts.

Report sent to: Ed Bastow, Managing Director, on 09/10/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Management - General management	Assessed (A)	
IR2A - Operations - Permitted activities	Assessed (A)	
IR3B - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	

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

Total 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 UPDATE SITE MEETING AND INSPECTION

06-10-23

Present: Ed Bastow, Keith Torr (Anglesey Energy (AE))

Tony Roberts (NRW)

INCIDENT FOLLOW UP, STAFFING LEVELS, CLAMP AND DRAINAGE ACTIONS

SYNBIOGAS DEVELOPMENT – INDUSTRIAL APPLICATION

FOLLOW UP TO CAR NUMBER 40918

INITIAL INCIDENT RESPONSE – WIR NUMBER - 2300104

A meeting and site inspection was convened to discuss the above issues and the follow up checks to the incident response engineering works.

Synbiogas Programme.

The industrial application of the synthetic microbiome produced by the Synbiogas partnership international programme was discussed in reference to a site trial with AE. It was agreed that the trial would go ahead overseen by Professor James Macdonald (Programme Lead), in partnership with AE and NRW as lead regulator and programme partner. The trial is set for November with exact dates and timings to be agreed.

Follow up Site Actions

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.

Complete.

2. Pollution of Waterway Leading to Afon Cefni.

Bulleted Summary of Actions and Responses.

The list of actions below is now complete.

During the site inspection of the 06th October 2023, the sump, hydraulically downgradient of the storage clamps, (which are now full or partially full of feedstock), was inspected for signs of ammonia or other organic pollutants. None were detected and site monitoring seems to confirm that the problem has been resolved. The recent wet conditions have replenished groundwater and

levels in the sump have recovered. No trace of organic pollutant could be detected at the time of inspection.

Follow up inspections will be conducted of the perimeter drainage ditch and sump at various intervals over the next few months to ensure a permanent solution has been achieved.

Previous Actions - Now Complete

- 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 done to all pipes
- Tarmacing contractor to add another course to clamp base if necessary before more feed substrate is added
- No substrate to be paced into clamps until investigation complete
- Site want to put things right and ensure complainants are satisfied with the response
- Site 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 then 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.
- **Actions complete.**

3. Odour Complaints

No further odour complaints to site or reported 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.

Actions complete.

4. Permitted Discharge

- No water has been released from the site since December (pond) water reused back in the process.
- Water may need to be released soon due to the high levels of rainfall.
- Pond water is crystal clear with no signs of pollution present.
- The regulation pond and land immediately surrounding, has developed into a biodiversity

hub for the site and the proposal is to preserve this small area of the site for further ecological improvement and offset.

- The covering net has now sunk and cannot perform its original function. It is a danger to wildlife and personnel and should therefore be removed.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.