

## Compliance Assessment Report CAR\_NRW0044652

**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:** Routine.

**On:** 28/06/2024 between 09:30 and 12:00.

**Parts of permit assessed:** 1. Management, 2. Operations, 3 Emissions.

**NRW Lead Officer:** Anthony Roberts.

**Report sent to:** Ed Bastow, Managing Director, on 03/07/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR2C - Installations - Operations - Operating techniques	Assessed (A)	
IR2D - Installations - Operations - Technical requirements	Assessed (A)	
IR3A - Installations - Emissions and monitoring - Emissions to water, air or land	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

#### **ANGLESEY ENERGY - COMPLIANCE INSPECTION**

28/06/2024

**Present:**

**Anglesey Energy: Ed Bastow, Keith Torr, Steve Blease**

**NRW: Tony Roberts**

#### **SITE INSPECTION AND BAT FOR THE ANEROBIC TREATMENT OF WASTE**

##### **BAT 38 – Emissions, Performance and Monitoring**

**Feedstock:** Consistent feedstock, is important to the process. Feedstock analysis is regularly undertaken. Maize, Rye, Meal and chicken manure are the main feedstocks. Samples are taken from the sheds every month. If anything changes in the feedstock samples are re-sent for analysis.

**Gas Monitoring CEMS:** Real time 5 channel gas monitoring is in place. 10 minutes of every hour there is a reading for temp/levels/mixer current/window visual check to ensure good mixing in the process and foaming is controlled.

**Digestate:** Digestate in the tanks is tested every month or 2 for nutrients, micronutrients ammonia then additional micronutrients depending on the results to ensure the chemistry is as close to ideal as possible.

**H2S Gas Production:** Peak H2S has been up to 1000ppm. Dosing with ferric hydroxide has reduced the H2S to about 200ppm and is currently about 80ppm. Dosing has been reduced recently as the H2S level has remained lower.

**Gas Scrubbing:** There is a carbon filter in the gas train to remove excess H2S. The highest AE have had through the engine is 150 ppm. This starts as 0 and rises as the carbon gets saturated. This is monitored by the gas unit and a portable unit. The carbon filter is on a change cycle. New filter delivered and fitted in July. The process on site is predictable due to steady nature of the feedstock.

**Siloxanes:** No issues with siloxanes.

**Foaming:** There was one occasion when the foam levels rose due to the introduction of Beet as a feedstock. There are level monitors which can act as a proxy for foam. If level rises it will stop feed and turn on all of the mixers and remove digestate. Chemical entry point used to introduce vegetable oil as an anti-surfactant reducing foam levels dramatically.

**Electronic Sensors/Pressure Relief Valves and CEMS:** All electronic sensors are checked once per year. The manual valves are tested manually and lift at the pressure it was constructed at. Under and over pressures

are compensated by relief or air ingress. Annual check with methane sensitive cameras for leak detection and compromised infrastructure. Valves and seals are manually checked. PRVs (Pressure relief valves) are checked regularly.

**ACTION: Update management plan to detail regular checks of the PRVs to monthly. This should be documented.**

**Waste Storage Building:** Chicken manure building scrubber is tested every 6 months. No issues reported with this system.

**Engine Emissions:** Gas engine emissions is an annual test which it passes each time. Testing performed by element Ltd.

**Flare:** Existing flare is burning rich and therefore temperature is outside the desired range affecting real time emissions. The burn temperature on the day was 752 DegC. It should be 950 C – 1050 C range. The existing flare does not appear to have self adjusting louvres which also may be affecting the burn temperature. On this occasion this has not been scored as a new flare has been ordered.

**ACTION: Provide a date for installation of new flare.**

Site would like more capacity in the flare as existing flare has 1000m<sup>3</sup>/hr capacity. Site produces maximally about 960m<sup>3</sup>/hr at 53% CH<sub>4</sub>.

Flare kicks in at a volume sensor on the gas bag. 80% full the flare will ignite.

**Groundwater/Surface Water Pollution:** Groundwater emanating from beneath the clamps is now clean and there is no SW present in the stream adjacent to the site. This issue appears to have been resolved.

**ACTION/General Comment:** Please ensure all areas of the site are cleaned of feedstock spillage by Friday the 26<sup>th</sup> July when the site will be re-inspected for this aspect in particular.

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](mailto: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](mailto: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.