

Compliance Assessment Report CAR_NRW0050131

Permit being assessed: MB3190HG.

For: A D Plant, **held by:** Edith Patricia Parry Ltd

At: Warren, Rhos-Y-Meirch, Knighton, Knighton, Powys, LD7 1PE.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 11/12/2025.

Parts of permit assessed: Management System, Records and Reporting.

NRW Lead Officer: Malcolm Dines.

Report sent to: Lucy Owen, Technically Competent Manager, on 11/12/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	C3 Minor	1.1.1
W4A - Waste - Information - Records	Action only (X)	
W4B - Waste - Information - Reporting	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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?

Criteria	Action needed	Complete by
W1A	Submit a copy of the version of your Environmental Management System in use on 11 December 2025	21/12/2025
W4A	Submit your process records (in a Microsoft Excel compatible format) for the period 1 June 2025 to 30 November 2025 (inclusive), for the following: <ol style="list-style-type: none"> 1. Amount of Methane in the Biogas 2. Level of Digestate Ammonia 3. Alkalinity 	21/12/2025

Criteria	Action needed	Complete by
	4. Amount of Volatile Fatty Acids (VFA) 5. Alkalinity:VFA ratio 6. pH 7. Records of Daily/Weekly/Monthly routine checks and maintenance 8. Records of Pressure Relief Valve checks and actuations 9. Records of Auxiliary Flare operating hours	
W4B	Submit a copy of the Stack Emission Monitoring for the period 22 January 2024 to 21 January 2025	21/12/2025

Compliance criteria codes are listed in the 'Important information' section below.

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

This review of data was carried out by Malcolm Dines (Waste Regulation Officer) following a review of outstanding compliance actions. On the Compliance Report (CAR_NRW0048821) dated 08 August 2025, you were required to submit the Stack Emission Monitoring Report for 2024-25 and also details of process records for the site.

Both of these actions were required to be submitted before 31 August 2025 and you have not submitted either. While I accept that there there was a significant delay in sending out the compliance report, this was acknowledged in the cover email and you have now had over four months to provide the required information.

Permit Breaches

W1A - General Management - Cat 3: Permit Condition 1.1.1

You have been given this Category 3 breach of permit condition 1.1.1 as you have failed to comply with the actions required on Compliance Report CAR_NRW0048821. These actions required you to submit, by 31 August 2025:

The Stack Emission Monitoring Report for the period 22 January 2024 to 21 January 2025
 Records of your process stability and site maintenance for the period 1 January 2025 to 30 June 2025.

Completing actions required by Natural Resources Wales as part of permit regulation is an integral part of managing you site in a way that prevent or minimises pollution.

Action: Submit the version of your Environmental Management System that was in use on 11 December 2025 **by 21 December 2025**

Please see "Other Matters" section below for actions that are required relating to site operations that did not result in a permit breach.

Other Matters

W4A - Records - Process Records: Permit Condition 1.1.1 & 2.1.2

Permit condition 1.1.2 requires you to maintain records demonstrating compliance with condition 1.1.1 which, in turn, requires you to operate in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations. Permit condition 2.1.2 requires that all process plant and equipment shall be operated, and fully documented and recorded, in accordance with the manufacturers recommendations. To comply with the above two permit conditions you should have a process monitoring system, the purpose of which is to:

- ensure a stable digester operation;
- minimise operational difficulties, such as foaming, which may lead to odour emissions;
- provide sufficient early warning of system failures which may lead to a loss of containment and explosions

Action: To demonstrate compliance with permit condition 1.1.1 and 2.1.2. please submit your process records (in a Microsoft Excel compatible format) for the period 1 June 2025 to 30 November 2025 (inclusive), for the following:

- Amount of Methane in the Biogas
- Level of Digestate Ammonia
- Alkalinity
- Amount of Volatile Fatty Acids (VFA)
- Alkalinity:VFA ratio
- pH
- Records of Daily/Weekly/Monthly routine checks and maintenance
- Records of Pressure Relief Valve checks and actuations
- Records of Auxiliary Flare operating hours

If you do not have some or all of these records, you must explain why, including how you ensure process stability. These records must be submitted **by 21 December 2025**

W4B - Reporting - Stack Emission Monitoring: Permit Condition 3.5.1

The above permit condition requires you to undertake stack emission monitoring every 12 months. The last stack emission monitoring was carried out on 22 January 2024 and therefore you should have undertaken monitoring by 21 January 2025 and should be able to submit this information at short notice.

Action: Submit a copy of the Stack Emission Monitoring for the period from 22 January 2024 until 21 January 2025 **by 21 December 2025**

Action: Submit a copy of

1. The Stack Emission Monitoring report for the period from 22 January 2025 until 21 January 2026 **OR**
2. The date that the stack emission monitoring for that period will take place.
3. Notify Natural Resources Wales of all future Stack Emission Monitoring as per permit condition 4.3.3

W4B - Reporting - Stack Emission Monitoring: Permit Condition 3.5.1

I reviewed your Waste Returns for 2025 and they are up-to-date and compliant.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012

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 Waste compliance criteria (used in section 1 and 2):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – 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.