

Compliance Assessment Report CAR_NRW0039486

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: Report/Data Review, Reason: Other.

On 01/03/2022 between 10:15 and 12:00.

Parts of permit assessed: 1, 2.4, IC5, 6 & 7

NRW Lead Officer: Anthony Roberts.

Report sent to: Ed Bastow, Managing Director on 02/03/2022.

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

| Part of permitted activity assessed (criteria) | Assessment result | Permit condition |
|---|-------------------|------------------|
| C2 - General Management - Management system and operating procedures | Assessed (A) | |
| E1 - Emissions - Air | Assessed (A) | |
| B1 - Infrastructure - Engineering for prevention and control of emissions | Assessed (A) | |
| B3 - Infrastructure - Site drainage engineering (clean and foul) | 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 BRef Compliance Assessment

01 March 2022

Summary

Following a permit variation and consolidation by NRW, to implement the BRef and BAT conclusions for Waste Treatment, several improvement conditions (ICs) were due to be in compliance by the 17th February 2022. These ICs were reviewed at site with Managing Director Ed Bastow.

NRW conducted a site BAT/BRef Improvement Condition Review to ensure compliance with the new permit requirements. This included a review of actions taken to meet the new BRef Reporting and Emissions requirements due in August 2022. All aspects of the ICs were audited and the site is in compliance with the new permit and BAT requirements. It is on target to meet the IC for August 2022.

IC5

The operator shall submit to Natural Resources Wales a written procedure(s) describing how they intend to meet the following BAT requirements in accordance with requirements specified within BAT Conclusion of the Waste Treatment BREF Document (EU 2018):

Deadline - 17 February 2022 or otherwise agreed in writing with NRW

- BAT 1 (IV)(XII)(XIII) Environment Management System

Submitted and agreed

- BAT 2(b) and BAT 2(c) – Improving environmental performance

2(b) and BAT 2(c) refer to waste acceptance and tracking system/inventory. BRef Review document submitted extracted from the EMS.

Submitted and Agreed

- BAT 3(i)(a) and BAT 3(i)(b) – Establish and maintain a wastewater and waste gas inventory as part of the EMS

Referred to the ACRON data logger, which logs all data from the site controlled by SCADA through ACRON. Not waste gas as such. Same controls apply to wastewater. No flows off site as all wastewater used in process.

Submitted and agreed

- BAT4(b) – Adequate storage capacity

Capacity in storage tanks logged in ACRON. Records kept on retention time and buffer capacity in the tanks.

Submitted and agreed

- BAT 8 – Monitoring emissions to air

Monitoring controlled by permit conditions and agreed bio-aerosol protocol. Element (approved consultant) will upgrade monitoring in line with the BAT changes due on the 22nd August.

- BAT 19 (c) – Impermeable surface

Detailed in the EMS condition is now met. Primary and secondary containment.

Submitted and agreed

- BAT 21 – Emissions from accidents and incidents

Measure in place for Drainage, storage, lagoons and incident an accident log. Conditions and BAT Sub Conclusions a,b and c are now met.

Submitted and agreed

- BAT 24 – Reuse of packaging

Detailed in EMS – Condition met.

Submitted and agreed

- BAT 34 – Reduce emissions to air of dust, organic compounds and odorous compounds (including H₂S and NH₃)

Channelled emissions/Point source. Chicken muck hall has fabric filter and UV plus Iputech odour scrubbing system in place to meet BAT requirements. Condition met.

Submitted and agreed

- BAT 36 – Biological treatment of waste: aerobic methods

N/A as composting aspects of permit suspended

- BAT 37 – Biological treatment of waste: aerobic methods

N/A as composting aspects of permit suspended

IC6

The Operator shall submit for written approval a methodology for meeting the process parameters listed in table S3.3 as per BAT 38 for the anaerobic treatment of waste. The methodology shall identify each of the process parameters and detail the frequency and techniques in place to record the data. Where a process parameter cannot be monitored justification should be provided and/or a suitable alternative proposed. The methodology should include trigger levels for each of the parameters with associated procedures in place if trigger levels are exceeded.

17 February 2022 or otherwise agreed in writing with Natural Resources Wales

All monitoring aspects are in place and biogas flow and quality is monitored electronically and available for data extraction at any time.

All other requirements have been met.

Submitted and agreed

PRTR Data to be submitted by the 31st March

IC7

The Operator shall submit a written report to Natural Resources Wales for approval detailing how the site will implement the latest version of 'Technical Guidance Note M9 Environmental monitoring of bioaerosols at regulated facilities dated July 2018 Version 2'. The written report shall be submitted to Natural Resources Wales by July 31st 2021 and provide procedures and timelines for implementing the new methodology by October 31st 2021.

Submitted and agreed

Requirements of Schedule 4b must also be met following the change in reporting effective from 22nd August 2022 in line with the BRef variation requirements and changes in the permit.

Existing monitoring requirements are in place until 17th August 2022. They will then be replaced with the requirements in Schedule 3b. To ensure this improvement condition is met there will be a further BAT and Permit Review site meeting in early July.

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.