

Compliance Assessment Report CAR_NRW0048558

Permit being assessed: SP3537VQ.

For: Bryn Pica AD Plant EPR/SP3537VQ, **held by:** Biogen Bryn Pica Ltd

At: Bryn Pica Landfill Site , Aberdare, Rhondda-Cynon-Taff, CF44 0BX.

Type of assessment: Site Inspection,

Reason: Routine.

On: 10/06/2025 between 09:00 and 17:00.

Parts of permit assessed: Various.

NRW Lead Officer: Greg Gardner, accompanied by Mostyn Wall.

Report sent to: Mr. Richard HARRIS, Regional Compliance Manager, on 11/07/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2B - Installations - Operations - The site	Assessed (A)	
IR2C - Installations - Operations - Operating techniques	Assessed (A)	
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Assessed (A)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	

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?

Criteria	Action needed	Complete by
IR3B	Send the last OGIC survey results to NRW and the standard operational procedure for undertaking an OGIC survey.	31/07/2025
IR1A	Action: Ensure the DSEAR signage and drawings are up to date and are available to staff. Confirm to NRW that the 2022 DSEAR report has been implemented.	31/07/2025

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.

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

This report details the site visit made on the 10th June 2025 to at the Biogen Bryn Pica Ltd AD Plant, permit reference number EPR/SP3537VQ.

Natural Resources Wales (NRW) Senior Officer Greg GARDNER and Lead Specialist Mostyn WALL attended the Bryn Pica AD Site, Merthyr Road, Llwydcoed, Aberdare, Rhondda Cynon Taf CF44 0BX for a planned routine site inspection at 11:00am where they were met with members of Biogen Management. The weather was dry, muggy and reasonably mild at the time of the inspection.

GENERAL OBSERVATIONS

The purpose of the visit was to conduct a site handover from Officer WALL to Officer GARDNER and to become familiar with the sites operations, process and surroundings. Discussions took place regarding current site operations and future intentions such as any planned maintenance. Site management walked NRW Officers through the process where it was noted that there were no offensive odours witnessed both inside and outside the permitted boundary and / or excessive noise / dust witnessed.

Housekeeping on site was in good order and all required safety signage barriers were visible and in place during the inspection. The flooring infrastructure appeared to be in good working order with no visible defects present.

It was noted a secondary containment measure (bund) which held an IBC (Intermediate Bulk Container) on top - which contained ferrous chloride, contained rainwater within it. Whilst this is expected as it is based outside, it should be regularly checked and any excess rainwater removed from the bund as potentially, if it contained enough rainwater, and the IBC was to fail, the bund would become overwhelmed leaking contaminated water on site.

Discussions took place regarding the digestate tank on site which is open topped. According to a drawing presented on site, a DSEAR (Dangerous Substances and Explosive

Atmospheres Regulations 2002) zone, was not present around the digestate tank but is present in the DSEAR risk assessment seen by NRW where a zone 2 is above the digestate storage tank (DSEAR Risk Assessment 2022).

Action: Ensure the DSEAR signage and drawings are up to date and are available to staff. Confirm to NRW that the 2022 DSEAR report has been implemented.

The site undertakes a optical gas imaging camera (OGIC) survey every 6 months to check for emissions of methane from the site. The use of OGIC is BAT and shows commitment to identify and eliminate fugitive emissions of methane.

Action: Send the last OGIC survey results to NRW and the standard operational procedure for undertaking an OGIC survey.

ANNUAL EMISSIONS DATA

The site submitted their annual emissions data on 14/01/25 in full. Further details of this can be found with CAR form - CAR_NRW0048476.

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

END.

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.