

Compliance Assessment Report CAR_NRW0049163

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: Report/Data Review,

Reason: Other.

On: 19/08/2025.

Parts of permit assessed: Various.

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

Report sent to: Mr. Leigh HAWKINS, Site Manager, on 19/08/2025.

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	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
IR1A	Review and update sites LDAR procedure in the event of any future gas leaks following any LDAR surveys, to notify NRW at the earliest opportunity via a schedule 5 notification.	03/10/2025

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 a response to actions identified in a previous CAR form (CAR_NRW0048558) following a site visit made on 10th June 2025 to the Biogen Bryn Pica Ltd AD Plant, permit reference number EPR/SP3537VQ.

PREVIOUS ACTIONS - CAR_NRW0048558 - 10/06/25

Action 1 (10/06/25): 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.

Response from operator on 31/07/25:

"All DSEAR signage and drawings are up to date and available to site staff. The DSEAR zoning and plans are incorporated into the site induction. The DSEAR Risk Assessment 2022 (please see attached) published on 23rd February 2023 by Chart Associates Ltd has been implemented accordingly.

The open topped digestate storage tank containing fully recovered and stabilised PAS110 digestate is equipped with a Lightweight Expandable Clay Aggregate (LECA) floating cover. In accordance with section 1.5 of the Executive Summary of the DSEAR Risk Assessment, the storage tank requires minimal Hazardous Area Classification and adequate controls. As specified in the Hazardous Zoning Tables in the report (reference 28), the digestate storage tank is classified as a Zone 2 (as shown in blue on the attached DSEAR plan dated 10th August 2023) for 0.5 metre above the LECA coverage and the gas is only at a potential explosible concentration occasionally (10 > 1000hrs/yr) and is therefore a hazardous area occasionally during normal operation as can be seen below in drawing 11. Zone 2 is a place which an explosive atmosphere is not likely to occur in normal operation, but if it does, only occurs for short periods."

Following this response with detailed explanation, NRW are satisfied that this action has been completed and implemented.

Action 2 (10/06/25): Send the last OGIC survey results to NRW and the standard operational procedure for undertaking an OGIC survey.

Response from operator on 31/07/25:

"Please find attached the latest Leak Detection and Repair (LDAR) survey conducted at our Bryn Pica AD facility on 13th June 2025. The survey found one minor leak emanating from the gas blower's container. Following removal of the casing, the leak was identified as coming from the blower vents and was caused by the low level of grease within the auto-greaser tubes. An Improvement Log was raised on our IMS to record and remediate the minor leak which has now been completed successfully as can be seen below."

Following this response with detailed explanation, it was noted that NRW were not notified, via a Schedule 5 Notification, of the minor gas leak that was identified on a gas blower on

16/06/25. NRW have reviewed the Biogen Leak Detection and Repair Procedure (LDAR) and whilst this document is comprehensive and it was classed as a minor gas leak, the reporting procedure (under section 11) would benefit from an review and be updated to reflect notifying NRW for any potential future occurrences at the earliest opportunity.

Action: Review and update sites LDAR procedure in the event of any future gas leaks following any LDAR surveys, to notify NRW at the earliest opportunity via a schedule 5 notification.

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.