

## Compliance Assessment Report CAR\_NRW0049627

**Permit being assessed:** HB3935AE.

**For:** Pancross A D Plant, **held by:** Vale Bio - Energy Ltd

**At:** Llancarfan, Barry, South Glamorgan, CF62 3AJ.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 16/09/2025 between 13:00 and 14:00.

**Parts of permit assessed:** Various.

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

**Report sent to:** Mr. Christopher HANKS, Site Manager, on 20/10/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2E - Installations - Operations - Improvement programme	C3 Minor	2.4.1
IR4B - Installations - Information - Reporting	C3 Minor	4.2.1
IR1A - Installations - Management - General Management	Assessed (A)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
2	8

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
IR2E	Ensure completion of all outstanding improvement conditions, with supporting evidence submitted to Natural Resources Wales (NRW) for review and verification.	30/01/2026
IR4B	Ensure that monitoring results are reported to NRW before the end of the year. Update EMS to ensure a reporting procedure is in place. Send NRW evidence of the EMS reporting procedure.	28/11/2025

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 report details the site visit made on the 16th September 2025 to at the Pancross Farm AD Plant, permit reference number EPR-HB3935AE.

Natural Resources Wales (NRW) Senior Officer Greg GARDNER and Lead Specialist Mostyn WALL attended the Pancross Farm AD Site, Llancarfan, Barry, Vale of Glamorgan CF62 3AJ for a planned routine site inspection at 13:00pm where they were met with members of Pancross Farm AD Management. The weather was dry, sunny 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.

During the course of the site inspection, officers observed that notable infrastructure improvements had recently been carried out. These enhancements included both general upgrades and more targeted engineering works, indicating a proactive approach to maintaining and improving operational standards. The nature and extent of these works suggest a commitment to ensuring the site remains compliant with relevant regulatory requirements and fit for purpose.

Housekeeping across the site was assessed as satisfactory. Work areas were generally tidy, with no accumulation of waste or materials that could pose a hazard. Importantly, there were no offensive odours detected during the inspection, and environmental conditions were acceptable. Dust levels were minimal and did not appear to present a nuisance or health risk, and ambient noise was within reasonable limits, with no excessive or disruptive sounds noted. See photos 1-4



**Photo 1 - CHP engine at Pancross Farm**



**Photo 2 - Newly installed engineering / infrastructure at Pancross Farm**



**Photo 3** - Gas flare at Pancross Farm



**Photo 4** - Digester unit at Pancross Farm with bund

### **IMPROVEMENT CONDITIONS**

The site's current environmental permit (EPR/HB3935AE), specifically Section 2.4 – *Operating Techniques*, includes a requirement to implement specific improvement conditions to ensure full compliance with all applicable Best Available Techniques (BAT) conclusions and BAT-Achievable Emission Levels (BAT-AELs).

During discussions with the site operator, it was indicated that the majority of these improvement conditions are either still in progress or have not yet been completed. These specified improvement conditions must be completed to ensure continued compliance with the conditions of your environmental permit. Please refer to the extract below from the site's environmental permit outlining the relevant improvement conditions.

Given that this matter has been raised previously and considering the amount of time that

has elapsed since the permit was issued, a Category 3 Breach has now been recorded against the permit in relation to the outstanding improvement conditions

**Improvement conditions**

Operators of existing facilities (permits issued before 20 December 2021) shall:

1. Undertake an inspection and works programme to ensure that all primary and secondary containment is fit for purpose and shall include:

(a) an assessment and inspection of all primary containment, using a Written Scheme of Examination devised and undertaken by an appropriately qualified certified engineer

(b) an assessment and inspection of all secondary containment against the standards set out in CIRIA 736 by a chartered structural engineer

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(c) written reports of the findings of a) and b) (improvement condition 1) shall be submitted to Natural Resources Wales. Where the reports do not demonstrate that critical primary and secondary containment is fit for purpose, the reports shall contain detailed proposals to bring the containment up to the required standards including timescales for the implementation of individual measures ('the measures'), or shall propose alternative appropriate measures to ensure all polluting materials will be contained on site

(d) where it contains proposals for works, the report recommendations shall be implemented by the operator in accordance with Natural Resources Wales's written approval

2. Produce and submit a schedule of planned improvement and maintenance as identified by a HAZOP or risk assessment and, or suppliers.

3. Submit to the Natural Resources Wales a register of all combustion plant on-site in the format detailed in Appendix A to these rules.

4. Operators at existing facilities shall submit a report setting out progress to achieving the BAT conclusions and BAT-AEL's where BAT is currently not achieved but will be achieved.

The report shall include, but not be limited to, the following:

(a) current performance against the BAT conclusions and BAT-AELs

(b) associated targets and timelines for reaching compliance.

**ACTION:** Ensure completion of all outstanding improvement conditions, with supporting evidence submitted to Natural Resources Wales (NRW) for review and verification.

#### **MONITORING REPORTING / SUBMISSIONS**

According to NRW records, the last submitted monitoring data for the site was on 20/02/24. As per permit conditions under section 4.2.1, the operator shall send all reports and notifications required by these standard rules to Natural Resources Wales using the contact details supplied in writing by Natural Resources Wales in accordance with table 4.2 (see below):

**Table 4.2 Reporting requirements**

<b>Parameter</b>	<b>Emission or monitoring point (reference)</b>	<b>Report frequency</b>
Emissions from the combustion plant	In accordance with rule 3.1	By 31 January of each year
Efficiency of biofilter and other abatement systems	In accordance with rule 3.5	By 31 January each year detailing the removal efficiency of all abatement systems and planned maintenance (in accordance with rule 3.3.1)
Digester process and gas production process monitoring	In accordance with rule 3.5	Summary reports - quarterly during the first year then yearly thereafter or as agreed with the Natural Resources Wales
Digester tank integrity	In accordance with rule 3.5	5-yearly from the date of commission or as per the manufacturer's recommendation, whichever is sooner
Under and over pressure relief systems	Inspection and calibration maintenance in accordance with rule 3.5	Yearly summary report of over-pressure and under-pressure events detailing mass balance release
Leak detection and repair	Inspection calibration and maintenance	Yearly summary report by 31 January
Use of auxiliary flare burning surplus biogas	In accordance with rule 3.5	Submit a report of flare usage by the 31 January each year. Note: you are not required to report routine maintenance testing of flares for short periods, but they should be clearly documented
Non-compostable contamination removal efficiency	In accordance with rules 2.3 and 2.4	By 31 January each year, submit a report detailing contamination removal efficiency and progress with plastic reduction contamination
Waste returns	In accordance with rule 4.2.2	Within one month of the end of each quarter
Recovered outputs	In accordance with 4.2.3	Within one month of the end of each quarter
Medium combustion plant and generators	In accordance with 4.3.5	Each year on 31 January detailing date commissioned location, serial number and thermal input for each unit as detailed in Appendix A. New plant must be notified in accordance with rule 4.3.7

This issue was previously raised in CAR form (CAR\_NRW0043541) on 31/12/2023, resulting in a Category 3 breach being issued to the operator. Although the required action was completed on 20/02/2024, there has been a repeat occurrence concerning the 2024

monitoring data, which was due for submission to NRW by 31/01/2025. As a result, the site has again been scored a Category 3 breach for this non-compliance

**ACTION:** Ensure that monitoring results are reported to NRW before the end of the year. Update EMS to ensure a reporting procedure is in place. Send NRW evidence of the EMS reporting procedure.

*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](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.