

Compliance Assessment Report CAR_NRW0050330

Permit being assessed: DP3732SQ.

For: Bryn Pica Landfill EPR/DP3732SQ, **held by:** Cynon Valley Waste Disposal Company Ltd

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

Type of assessment: Site Inspection,

Reason: Routine.

On: 06/01/2026 between 10:00 and 11:30.

Parts of permit assessed: Various.

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

Report sent to: Mr. Lee FOULKES, Site Manager, on 12/02/2026.

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	C3 Minor	1.1.1
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.3.1

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
IR1A	Review EMS / OMP to ensure the site operates to prevent and / or mitigate future fugitive emissions from site	27/03/2026
IR3B	Bring fugitive emissions under control by installing gas infrastructure and temporary capping	27/02/2026

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

This report details the site visit made on the 6th January 2026 to at the Bryn Pica Landfill Site, permit reference number EPR/DP3732SQ.

Natural Resources Wales (NRW) Senior Officer Greg GARDNER and Lead Specialist Mostyn WALL attended the Bryn Pica Landfill Site, Llwydcoed, Aberdare, Rhondda Cynon Taf CF44 0BX for an odour survey in the local area (Abernant) and an unannounced site inspection at 10:30am where they were met with Site Manager. The weather was cold, frosty, dry and sunny with little to no wind at the time of the inspection.

ODOUR SURVEY

On Tuesday morning (6th January), NRW Officers GARDNER and WALL conducted an odour survey from 07:00 to 09:00, covering Richmond Gardens, Moss Place, and the eastern boundary of the Bryn Pica landfill (see map 1 below). No odours were identified during the two-hour survey.

During the survey, whilst at the eastern boundary of the landfill (closest point to the landfill tipping face - see photo 1), no odours were detected by either Mostyn or I. The site was also non-operational to which it has been since the 5th December with no current indication of planned operations resuming. However, the onsite waste transfer station was operational at the time of the survey (see photo 2)

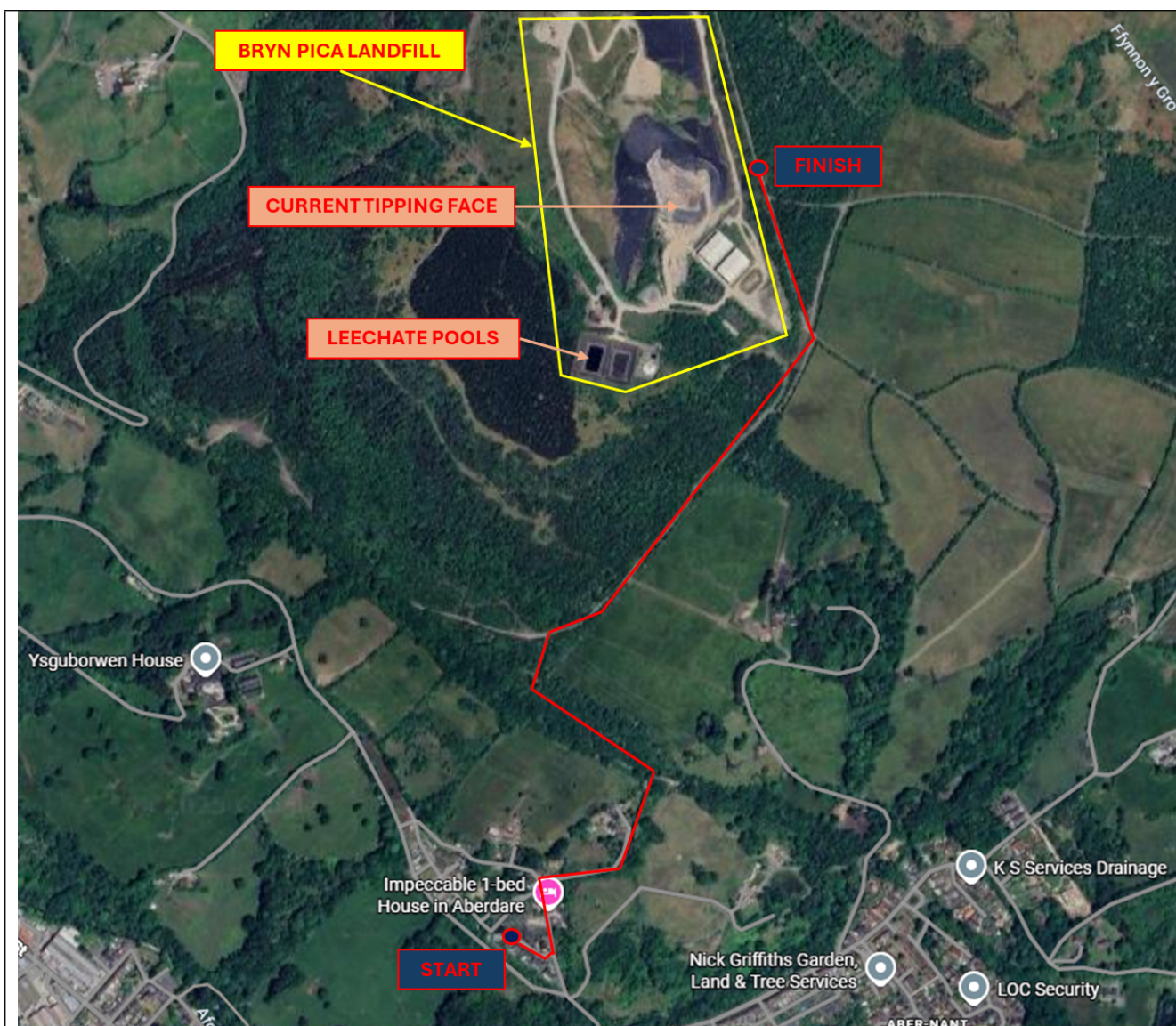


Photo 1 - Tipping face of Phase 5A, partially covered in soil and non-operational



Photo 2 - On site waste transfer station which was operational at time of survey

Upon our return to Richmond Gardens during our odour survey, NRW Officers unexpectedly met the Bryn Pica site manager who was undertaking off site odour monitoring. Again, following verification of the data, no odours were detected during this survey by the operator. At no point prior to the odour survey NRW Officers conducted was the operator aware of NRW's visit to Richmond Gardens for said survey or the subsequent visit to the Bryn Pica landfill site.



Map 1 - Odour survey route (red line) with starting and finishing location(s) as well as location of Bryn Pica Landfill site

Following the odour survey, NRW Officers then ventured to the Bryn Pica Landfill site for an update with the operator following our visit prior to Christmas (CAR_NRW0049164). The operator indicated the following:

Current / Completed Works Update

- **Cessation of Waste Acceptance since 5 December 2025**
 - Waste acceptance was halted to allow significant earthworks to be undertaken to place additional cover and capping material over the waste, reducing the risk of odorous emissions
- **Soil Capping Material**
 - 3,500 tonnes of soil were placed between 8–19 December 2025
- **Temporary Gas Extraction Infrastructure (Pin Wells)**
 - Installation of 10 temporary pin wells during the week commencing 15 December 2025. Combined with the additional soil cover, these wells increased

total gas capture by an estimated 25%

- **On site and Off site Odour / Air Quality Monitoring**

- Amgen Officers have been proactively monitoring air quality both on site and within the community, including outside normal working hours and are yet to detect any moderate or strong landfill odours either through direct observations or using specialist handheld equipment.

Further Works Update

- **Permanent Landfill Gas Extraction Wells**

- The site has committed to install six additional vertical gas extraction wells in the current tipping area. These are typically installed only once tipping within a cell is complete; however, in response to complaints, the site is accelerating this work. Subject to contractor availability, installation is planned for week commencing 26th January 2026

- **Temporary (Plastic) Capping**

- The soil cover already placed will be supplemented with a plastic liner, which has historically been highly effective in suppressing emissions. An area of approximately 6,000 m² has been identified for capping, to be installed following the installation of the new gas wells which is planned for week commencing 16th February 2026.

SITE INSPECTION

Breaches Recorded

IR1A General management – Category 3 (C3) breach - Permit condition 1.1.1 (a)

Permit condition 1.1.1 (a) states: *The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints.*

IR3B Emissions of substances not controlled by emission limits – Category 3 (C3) breach - Permit condition 3.3.1

Permit condition 3.3.1 states: *Fugitive emissions of substances (excluding odour, noise and vibration) shall not cause pollution. The Operator shall not be taken to have breached this condition if appropriate measures have been taken to prevent or where that is not practicable, to minimise, those emissions.*

NRW subsequently carried out an inspection of the landfill site, including a visit to the active tipping face, which has not been operational since 5 December 2025 due to odour complaints. The tipping face was observed to be covered with soil, and the cover appeared to be appropriately engineered to ensure all active areas were adequately contained in accordance with the site's Odour Management Plan (OMP).

NRW Officers also inspected the newly installed gas-extraction infrastructure. Measurements taken by NRW Officers during the inspection indicated fugitive emissions of landfill gas from point sources, including the bases of newly installed wells and from leachate

towers (see Screenshot 1). The planned works outlined in the “Further Works Update” section above are essential to improving gas capture efficiency and eliminating these fugitive emissions.

Methane Emissions Survey Sheet –

Site	Bryn Pica Landfill	Date	6/1/2026	Time	in: 10:45 out: 11:00
Instrument	Gazomat Spectra TDL	Test gas reading	-	Time	-
Next Calibration due		Background reading	1.8ppm	Time	
Weather conditions:	Sunny Cold, slight wind NE			Atm. Press.	1013
Survey Undertaken by:	Greg Gardener, Mostyn Wall				

General comments / observations

Survey Results				
Point ref.	Time	Methane Reading	Feature and / or Grid Reference	Description / Comment
	10:45	130ppm	SO 0101904786	Top of tipping face
P2502	10:46	2.3% Gas	SO 0104504788	Base of pin well. Cracked bentonite at the base of the well
P2218	10:47	300ppm	SO 0105504783	Base of pin well
4B	10:48	6.1% gas	SO 0109104755	Gas reading measured at the base of the leachate tower. Located at the bottom of the tipping face
	10:49	34ppm	SO 0107904749	Measured from the soil cover next to the leachate tower.

Screenshot 1 - Methane Emissions Survey conducted by NRW Officers Greg GARDNER & Mostyn WALL at Bryn Pica Landfill on 06/01/26.

While it is recognised that prevailing weather conditions, together with the site’s current and planned mitigation measures, adherence to the OMP, and operational responses, contribute to effective landfill management, there remains scope for the site to take further action to minimise fugitive emissions. Without additional controls, there is an increased likelihood of odour migrating beyond the permitted boundary, which may result in further complaints.

A comprehensive review of the site’s OMP is required to ensure full alignment with NRW regulatory expectations and that all preventative and responsive measures remain current, robust, and proportionate to the operational risks. This review should confirm that the OMP provides clear, practicable controls capable of preventing, minimising, and - where possible - eliminating odour emissions under both normal and atypical operating conditions. Strengthening the OMP in this manner will ensure that, should similar circumstances arise in future, the site can respond more effectively and efficiently, thereby reducing the likelihood of nuisance odours migrating beyond the permitted boundary and ensuring continued compliance with permit conditions and NRW guidance.

The operator’s off-site odour surveys have, on several occasions, recorded elevated

concentrations of hydrogen sulphide (H₂S) on the site's *Jerome Monitor*. Although these readings were not independently verified by an NRW warranted officer, the monitoring data supplied by the operator indicates that H₂S was present beyond the site boundary.

Any off-site odour detection would constitute a breach of permit condition 3.4.1, which requires the operator to prevent or minimise pollution arising from onsite activities and to ensure that odours are not detectable at levels likely to cause annoyance beyond the site boundary. However, as the reported odour was not substantiated by an NRW-warranted officer, the site cannot be considered in breach of its permit on this occasion.

Action (IR1A): Review EMS / OMP to ensure the site operates to prevent and / or mitigate future fugitive emissions from site by 27/03/26

Action (IR3B): Bring fugitive emissions under control by installing gas infrastructure and temporary capping by 27/02/26

It is noted that, although NRW has received odour complaints associated with the site, the operator has engaged constructively throughout the process. The operator has provided updates when requested and has facilitated access for Officers during site inspections. The site has acknowledged the issues identified and is undertaking actions to address them, including progressing planned works, responding to environmental complaints, and supplying information and data to support the ongoing investigation.

END

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

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.