

Compliance Assessment Report CAR_NRW0051052

Permit being assessed: AB3091ZZ.

For: Sychtyn, **held by:** Mr Edward Vaughan, Mr John Vaughan and Mrs Eluned Beryl Vaughan

At: Sychtyn, Llanerfyl, Welshpool, Powys, SY21 0JF.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 16/03/2026.

Parts of permit assessed: Emissions to Air.

NRW Lead Officer: Malcolm Dines.

Report sent to: Edward Vaughan, Technically Competent Manager, on 19/03/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W3A(2) - Waste - Emissions and monitoring - Emissions to air	Action only (X)	
W4B - Waste - Information - Reporting	Assessed (A)	

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
W3A(2)	Submit a report that investigates the Approach To Limit result for emissions of VOCs and which considers: <ol style="list-style-type: none"> 1) the engine maintenance schedules and engine oil analysis with the aim of identifying potential problems with the operation of the engine that may affect the emissions 2) potential impacts due to inlet gas composition 3) the condition of internal engine parts such as cylinder heads and seals 	10/05/2026

Criteria	Action needed	Complete by
	4) the engine management system and engine set-up	

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 review of data was carried out by Malcolm Dines (Waste Regulation Office) to assess compliance with the actions required by Compliance Report, ref: CAR_NRW0050391.

Other Matters

W3A(2) - Emissions - Permit Condition 3.6.1

You have been given this category 3 breach under the above permit condition because the results from the stack emission testing carried out on 24 February 2025 show a measured concentration of VOCs of 1,116 mg/m³, exceeding the emission limit value of 1,000 mg/m³ as set out in Table 3.1. of your permit.

In Part 1 of your report on page 3, the Executive Summary - Monitoring Results Summary states that the uncertainty in result for VOCs is 446 mg/m³, which is 40% of the the measured concentration. Using this value for uncertainty results in a lower confidence limit of 670 mg/m³, which is below the Emission Limit Value in your permit, but which means the result is Approach To Limit.

While this means that you are compliant with your permit, LFTGN08 v2 2010 sets out that when a result is Approach To Limit the operator must provide information on how uncertainty will be reduced on subsequent monitoring. When sites rely on the uncertainty allowance set out in table 4.7 it is not possible to reduce the uncertainty, but given that this is the second consecutive year that the emissions result for the engine has been Approach To Limit for VOCs, and it was also Approach to Limit in 2022 - you did not undertake emission monitoring in 2023 - it is expected that the monitoring results and emission profiles are reviewed and an investigation is made as to why this engine is repeatedly returning results that are Approach To Limit.

Action: Submit a report that investigates the Approach To Limit result for emissions of VOCs and which considers:

- the engine maintenance schedules and engine oil analysis with the aim of identifying potential problems with the operation of engine that may affect the emissions
- potential impacts due to inlet gas composition
- the condition of internal engine parts such as cylinder heads and seals

- the engine management system and engine set-up

Process Records

Compliance report CAR_NRW0050391 required you to submit records of your digestion process in order to demonstrate the stability of the process. In your email dated 30 January 2026 you provided details about some of the parameters required which indicate that methane in biogas; Digestate Ammonia, pH and the Alkalinity: VFA ratio were all within the expected range for a farm-fed digester.

However, you did not provide details of the alkalinity (although as the Alkalinity/VFA ratio was within expected range this would indicate that the alkalinity was also within the expected range). Additionally, you did not provide any records of these parameters, or records of Daily/Weekly/Monthly routine checks and maintenance.

The Operator Manual provided to you by manufacturer Fre-Energy includes checklists for daily and also weekly operations and maintenance and these are also included in your Environment Management System (SOP001) version 1. Permit condition 2.1.2 requires you to ensure that all process plant and equipment is commissioned, operated and maintained, and shall be fully documented and recorded, in accordance with the manufacturers recommendations and permit condition 1.1.1 requires you to operate in accordance with your Management System.

You must ensure that these checklists are completed each day and are kept for a minimum of six years as required by permit condition 4.1.1. and when requested, you must submit copies to Natural Resources Wales.

You provided a record of the operating hours for the auxiliary flare, for 1 July to 31 December 2025 inclusive that shows that the flare is not being used excessively. You have also provided records of the Pressure relief valve checks as required.

If you do not have some or all of these records, you must explain why, including how you ensure process stability.

Waste Returns

The outstanding waste returns have been submitted and have been assessed as compliant.

In this document 'Natural Resources Wales' means the Natural Resources 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 Waste compliance criteria (used in section 1 and 2):**1. Management**

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – 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.