

Compliance Assessment Report CAR_NRW0046301

Permit being assessed: RP3733PC.

For: Trecatti Landfill, **held by:** Biffa Waste Services Ltd

At: Trecatti Landfill Site, Fochriw Road, Merthyr Tydfil, Merthyr Tydfil, CF48 4AB.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: Annual Returns.

NRW Lead Officer: Lewis Evans.

Report sent to: Simon Milford, Site Manager, on 21/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2I - Installations - Operations - Leachate levels (only applicable to landfill)	C3 Minor	2.8.1
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.7
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	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
IR2I	Return to permitted limits	02/05/2025
IR3A(2)	Return to permitted limits	02/05/2025

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.

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

Biffa Waste Services Ltd – Trecatti Landfill

Permit Number: **EPR-RP3733PC**

Annual Report 2024 received and reviewed.

Monitoring data

Air Emissions

Engines 1 and 6 were compliant during the 2024 testing. Engines 4 and 5 were tested and measured, taking into account the uncertainty values with the testing method the results fell within limits and is therefore compliant.

Surface water

Both sampling points SWA and SWB were within compliance limits in both September and October. pH of SWB was at the limit in June. Approximately 90,304m³ of surface water was pumped off site in 2024.

Leachate

Leachate levels in LW1, LW2, LW4, LW7 and LW8 were non-compliant during the course of 2024. Site has experienced elevated levels which have been attributed to the wells location within the operational site and the infrastructure pumping being suspended. The treatment plant continues to run with similar volumes treated compared with last year. LW4 has undergone repair work and the level is now on a downward trend. Permit breaches are considered minor non-compliances a **Category 3 non-compliance** will be scored.

Sewer data

During this period 95,124m³ of treated leachate was discharged to the sewer. All parameters were compliant. It can be noted from the reporting that the months of May and September no samples were recorded due to maintenance issues in May and sample being misplaced by the courier in September. Please ensure that all samples are taken in 2025.

Groundwater

Groundwater levels throughout 2024 showed little variation. The slight level increase recorded towards the last quarter could be seasonal fluctuations. It is also noted that groundwater levels could

be influenced by the neighbouring quarry extraction which have ceased groundwater extraction and may need further investigation to understand the impact they may have on the site going forward. GW11 needs further investigation into the sudden elevated levels and a CCTV survey is being organised to understand this change in levels.

All parameters were compliant during the reporting period.

Ammoniacal nitrogen levels were stable in all of the boreholes. GW2 decreased in May 2024 and overall has slightly decreased during the 3 year period. Chloride levels also showed little variation in majority of the boreholes. The exception is with GW8 at the beginning of 2022 the chloride was 784mg/l and this has shown a decreasing trend (479mg/l). Mecoprop levels in GW2 show a decreasing trend. There was a peak in GW4 which was due a raised reporting limit of <0.08ug/l in November 2023. In GW12 the cadmium was a raised reporting limit at 0.007m/g in September 2023. Results for naphthalene, toluene and xylene were below the limit of detection.

Perimeter landfill gas

There were several exceedances of permit limits in perimeter boreholes during 2024. Boreholes 4, 7, 21, and 22 exceeded limits. These breaches are considered a minor non-compliance and a **Category 3 non-compliance** will be scored.

Gas Compound

The flare had flared 91,926m³ of LFG in 2024 and used 12,122.255 of LFG in the engines.

Dust & PM10 & Asbestos

Both result for PM10 and deposited dust were compliant for the reporting period. Asbestos monitoring was within permitted levels.

Biogenic

Chemtest Ltd carry out the analysis on behalf on Biogenic. Surface water samples are taken monthly from the Biopiles. No samples are taken from the Surface Water Lagoon as it has been integrated into the biogenic water treatment system. Pumping Permits are raised by Biogenic and authorised by Biffa Personnel when they want to pump from the Surface Water Lagoon into the 385 Lagoon and is signed off by Biffa only when the process water is compliant. Non-compliant water is sent to sewer.

No water was discharged during the reporting period.

Complaints

There were 0 complaints made against the site in 2024.

Topographical survey

Drawing title *Settlement January 24 -January 25 ref T3063400* received and reviewed.

Operator comments:

The landfill settlement over the last year at Trecatti Landfill shows an average of -0.073m across the

site.

Modelling of the settlement of landfilled waste, both in duration and quantum, is difficult to complete with any certainty due to the complex and variable parameters that contribute to the settlement process. Settlement in landfilled waste is subject to a number of factors, including loading, type of waste, depth of waste and other processes including chemical and microbial actions. These processes appear as time-dependent, and are also influenced by factors such as leachate composition, pH, temperature and moisture.

The settlement of waste over time comprises of two main elements:

Primary or immediate settlement - this is load related and primary drivers are the expulsion of air and liquid from the waste resulting in consolidation. The rate of settlement is dependent on the depth of waste and the type of waste (and the amount of air/liquid contained therein). This is active during waste filling and immediately following completion of waste tipping.

Secondary settlement – this is typically considered following post closure or cessation of tipping, and is initially a product of physio-chemical and mechanical creep (deformation due to load stresses) and then biological decomposition of the waste. These actions result in slow gradual settlement over a long period of time, typically many decades.

Complaints

Review of complaints - one single complaint made in relation to the site during 2024.

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.