

Compliance Assessment Report CAR_NRW0046573

Permit being assessed: JP3239ST.

For: Lamby Way Landfill Site EPR/JP3239ST, **held by:** The County Council of the City and County of cardiff

At: Lamby Way Landfill Site Lamby Way , Cardiff, Cardiff, CF3 8EQ.

Type of assessment: Audit,

Reason: Routine.

On: 11/03/2025 between 09:00 and 17:00.

Parts of permit assessed: 1.1 General management.

NRW Lead Officer: Brigid Armstead, accompanied by Mostyn Wall, Susan Francis, Sally Wakeford.

Report sent to: Contract Manager, Lamby Way Landfill Site, on 19/03/2025.

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	C3 Minor	1.1

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

Total non-compliances recorded	Total non-compliance score
1	4

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	Please ensure that MH4 casing is repaired.	30/04/2025

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

This CAR records a site visit made by NRW Officers to Lamby Way landfill site. NRW Officers in attendance were: Brigid Armstead, Mostyn Wall, Susan Francis and Sally Wakeford. NRW Officers were escorted by representatives from Cardiff Council and Infinis Energy.

The purpose of the site visit was to introduce a new regulatory officer from NRW (Brigid A), undertake an audit of the sites infrastructure and review the site under the national Landfill Emission Reduction Project (LERP).

This CAR covers the Infrastructure Audit with the scope including:

- gas management infrastructure,
- leachate management and treatment facilities,
- surface water monitoring points,
- groundwater monitoring points.

The gas utilisation plant is not included in this CAR as this is managed by Infinis under a separate permit.

The LERP report will be sent separately.

Action: Please ensure that all LERP report recommendations are actioned. **Due 30 June 2025.**

Current Status

The current status of the landfill is closed to waste input. Lamby Way South (LWS) ceased in Aug 2000 and the Lamby Way Eastern Extension (LWEE) stopped accepting waste on 1st July 2017. Final capping was reported to be completed in Dec 2017.

Surface Water Monitoring

Surface water drainage is managed from all areas of the site through the use of restoration profiles which divert into peripheral drains. The surface water then discharges via the surface water outfalls (SW1-SW6) from where it ultimately enters the Severn Estuary. SW1-SW5 are situated within LWS. SW1, SW4 and SW6 were inspected, these points appeared to be in good condition, other than the lack of sampling point labelling which could lead to errors in data collection and reporting.

Action: Please ensure that all monitoring points are easily identifiable.

Leachate

Leachate produced by the site is pumped from the extraction wells to the Leachate Holding Tank and then to the Leachate Treatment Plant (LTP) prior to discharge to foul sewer under a trade effluent consent issued by DCWW.

LWS has 9 leachate monitoring wells across the site. SL3 and SL8 were inspected during the site visit. SL3 appeared to be in good condition while SL8 appeared to be loose and with a damaged boot.

LWEE has 9 monitoring wells (L1 – L9) where monthly monitoring of leachate depth and quality is required. Of the leachate monitoring points inspected, the headworks appeared to be in good condition except that end caps were found to be missing from some

headworks.

Advisory: Please ensure that all leachate monitoring sites are properly maintained so as to ensure that O2 is not drawn in through the headworks.

An additional leachate well with headworks was seen on LWEE marked as LX. This Leachate site was located nearby to LMBW708 but is not mentioned in the 2023 closure report. Suction could be heard at this headworks, potentially resulting in O2 draw into the site. NRW were advised that this is a discontinued monitoring site.

Advisory: Please ensure that any discontinued monitoring sites are properly decommissioned so as to ensure that O2 is not drawn in through the headworks.

Leachate pumping wells

The leachate pumping wells (MH4, MH5, Ditch Pump) were inspected during the site visit. MH5 was installed mid 2024 and is used to collect leachate and pump it to MH4, this was previously gravity led. MH4 was seen to have holes visible in the well casing.

IR1A General Management- A category 3 non-compliance is assigned for the failure to maintain leachate infrastructure as per condition 2.10.1.

Action: Please ensure MH4 casing is repaired. Due: 30th April 2025.

Leachate holding tank

The holding tank receives leachate from M4, Ditch Pump, and Southern extraction. During the site visit this tank was found to have surface cracks and NRW were advised that the tank is approx. 20 years old.

Action: Please ensure that the leachate holding tank is included is maintained as part of the site preventative maintenance program.

Leachate Treatment Plant (LTP)

Improvements were made to the LTP telemetry in 2023. Council representatives advised that the current LTP is around 12 years old. The LTP is currently run on a generator and includes aeration units. Daily checks are made due to issues with telemetry. On inspection, there appears to have be retrofitted viewing holes on the tanks within the LTP.

Action: Please submit a preventative maintenance plan for the treatment plant tanks. Due 30th April 2025. Action complete by email received 25.11.25

Gas infrastructure

LWS is largely covered by a solar farm which restricts access around the site. A range of the LWS gas wells were viewed during the site visit. The condition of gas wells and headworks on LWS was generally good but some issues were identified as follows

- Adhesive tape present on some of the headworks
- Kanaflex corrosion
- Ponding around wells
- Absence of signage on headworks
- Expanding foam use on some of the headworks

LWEE gas wells that were inspected were mostly in good condition. There have been recent upgrades to the pipework with many of the Kanaflex pipe lines being replaced with

rigid pipe. Some assets such as KOP10, LMP, and Manifolds are lacking labelling.

Advisory: Please ensure that the preventative maintenance plan for leachate infrastructure is reviewed and implemented.

Advisory: Please ensure that assets are properly labelled to ensure that they can be easily identified.

Perimeter Gas Boreholes

There are 23 perimeter gas monitoring points listed in Table S4.5 of the permit (G1 – G23). G1-G12 were viewed during the site visit and no non-compliances were identified.

Monitoring points G22 and G23 have been lost due to damage and/or vegetation. These have been addressed as non compliances in CAR_NRW0046418.

Groundwater

Groundwater boreholes C4 – C22 are located surrounding on the exterior of LWS. The groundwater boreholes inspected during the site visit, appeared to be in good condition. No non-compliances identified.

Any compliance criteria not highlighted in the above summary should be considered as not assessed.

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.