

Compliance Assessment Report CAR_NRW0048710

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: 03/07/2025.

Parts of permit assessed: Quarterly Returns.

NRW Lead Officer: Lewis Evans.

Report sent to: Simon Milford, Site Manager, on 03/07/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Assessed (A)	
IR2I - Installations - Operations - Leachate levels (only applicable to landfill)	C3 Minor	2.8.1
IR2K - Installations - Operations - Landfill gas management (only applicable to landfill)	C3 Minor	3.1.7
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2

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

Total non-compliances recorded	Total non-compliance score
3	12

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	Please provide a root cause analysis for the leachate level breaches and ensure implementation of a plan to maintain leachate levels below the permitted limits.	28/08/2025

Criteria	Action needed	Complete by
IR2K	Please provide a root cause analysis and ensure that an action plan is implemented to ensure that landfill perimeter gas is not breached.	28/08/2025
IR3A(1)	Please provide a root cause analysis and ensure that an action plan is implemented to ensure that SWA can return to the permit requirements.	28/08/2025

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.

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

Biffa Waste Services Limited - Trecatti Landfill

EPR/RP3733PC/V013

On the 2nd of May 2025, Biffa operators submitted the quarterly returns to Natural Resources Wales (NRW).

The submission included the following documents:

- Schedule 5_Leachate levels January – March 2025
- Schedule 5_Permiiter Gas January – March 2025
- Schedule 5_Surface Water January – March 2025
- Trecatti Q1 Report January – March 2025

The three schedule 5's that were submitted included the Part A and Part B of each of the parameters that were breached.

Leachate Levels Jan – Mar 2025

Emission points LW4 (3040), LW6 (3060), LW8 (3080) breached the following levels:

Description	Date	Depth from base (m)	Leachate Level (m AOD)
Leachate Well 4	17/01/2025	52.81	386.00

Leachate Well 4	05/02/2025	53.81	387.00
Leachate Well 4	31/03/2025	54.41	387.60
Leachate Well 6	31/03/2025	5.03	377.19
Leachate Well 8	31/01/2025	34.48	365.48
Leachate Well 8	05/02/2025	39.48	370.48

The operator will continue to monitor the leachate levels and closely analyse the trends with the compliance limits.

Due to the exceedance in leachate levels during Q1, a **category 3 non-compliance** will be scored against permit condition 2.8.1.

Action: Please provide a root cause analysis for the leachate level breaches and ensure implementation of a plan to maintain leachate levels below the permitted limits by the 28th of August 2025.

Perimeter Gas

Emission points BH44 and BH22 exceeded the parameters for Methane (CH₄) and Carbon Dioxide (CO₂).

Permitted Limits					
Borehole	Date	CH ₄ Limit	CO ₂ Limit	CH ₄	CO ₂
81701004	03/01/25	3	10	6.2	3.9
81701004	03/02/25	3	10	5.4	4.3
81701004	14/03/25	3	10	6.5	4.3
81701022	03/01/25	1	10	4.7	12.3
81701022	03/02/25	1	10	1.4	2.5

The operator stated that the gas team continue to carry out general maintenance across the site and improvements to the extraction system continue to be made. Gas infrastructure is installed progressively at the site in agreement with NRW.

Due to the exceedances in landfill perimeter gas during Q1, a **category 3 non-compliance** will be scored against permit condition 3.1.7.

Action: Please provide a root cause analysis and ensure that an action plan is implemented to ensure that landfill perimeter gas is not breached by the 28th of August 2025.

Surface Water

Emission points SWA (81702001) & SWB (81702002) breached the parameters for Ammoniacal Nitrogen and pH.

Permitted Limits					
Borehole	Date	Ammoniacal Nitrogen limit	pH limit	Ammoniacal Nitrogen	pH
SWA (81702001)	28/01/2025	5mg/l	6-8	5.19mg/l	
SWA (81702001)	04/02/2025	5mg/l	6-8	8.77mg/l	
SWA (81702001)	25/03/2025	5mg/l	6-8		8.2
SWB (81702002)	25/03/2025	5mg/l	6-8		8.1

The operator has stated that the surface water points on site are heavily influenced by run off from surrounding grazing land. Ammoniacal Nitrogen for SWA was elevated over their compliance limits. Ammoniacal Nitrogen was back under the compliance limit in March.

During March the pH was slightly elevated for both points and within the uncertainty limits of the Laboratory instruments of 0.427 pH units. As the pH levels are within the uncertainty limit there is no breach of exceedance.

However, Ammoniacal Nitrogen had exceeded permitted limits from SWA (81702001) in 28th Jan and 4th Feb 2025. The breach in January was only 0.16mg/l over the limit therefore a single **category 3 non-compliance** will be scored against permit condition 3.1.2 for the breach in February.

Action: Please provide a root cause analysis and ensure that an action plan is implemented to ensure that SWA can return to the permit requirements by the 28th of August 2025.

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.