

Compliance Assessment Report CAR_NRW0049018

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: Other,

Reason: Routine.

On: 09/07/2025.

Parts of permit assessed: 4.2 Reporting.

NRW Lead Officer: Brigid Armstead, accompanied by Tyrone Ward, Mostyn Wall, Susan Francis.

Report sent to: Contract Manager, Contract Manager, on 01/08/2025.

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	Action only (X)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Action only (X)	

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
IR4B	Please advise on the dates when monitoring results submitted for SW6 derived from the pond in LWS.	31/08/2025
IR3A(2)	Please provide gas chromatography analysis reports and advise whether the current monitoring is steady state or peak.	31/08/2025

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.

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

Lamby Way meeting CAR

An online meeting was held between Natural Resources Wales (NRW) officers and Cardiff Council (CC) representatives for Lamby Way Landfill on 9th July 2025 to discuss the causes of non-compliances with permit EPR-JP3239ST and routes to bringing the site back into compliance.

Lamby Way landfill site currently relies on collection and pumping leachate to the onsite leachate treatment plant and has recently increased pumping capacity through installation of additional solar powered pumps. The site is very reactive with leachate levels rising if pumping is slowed or stopped.

CC advised that there have been recent improvements including a treatment plant refurbishment, an upgrade to the LTP program logic control system to ensure consistent extraction and the installation of solar pumps to target specific areas of the site.

It was highlighted by NRW that the leachate levels are likely to be the main obstacle for entering into definite closure.

NRW would welcome further investigation into the effects of groundwater and surface water on leachate. It was suggested that a review of the effects of tidal influence and monitoring water levels may assist in this investigation. Additionally, a water balance calculation should look at the effective rainfall since capping was completed, in conjunction with the site conceptual model and HRA. Coastal erosion since the 2005 model may have affected the assumptions of this model. This information could be used to update the HRA with potential to revise the limits as part of the closure variation.

Perimeter gas

CC were advised that their request to implement the GRA proposals to reduce the frequency of monitoring and number of monitoring points, would require a variation to the permit. This requires a variation application which can be integrated into the closure variation or made separately.

CC advised that they will be soon bringing the monitoring of the external wells back in house, which should help to ensure the quality of data collected and any defects with the wells can be actioned.

Action: Please provide gas chromatography analysis reports and advise whether the current monitoring is steady state or peak.

Reporting

A review of recent reporting found that improvements could be made by attention to the following factors:

- Uncertainty figures
- Noting on reports where wells are dry
- Quarterly oil and grease reporting
- Leachate level reporting for individual wells
- Inclusion of updated groundwater quality limits

It came to the attention of NRW that there is confusion between parties around the location and requirement for monitoring of SW6.

Regarding the location of SW6. CC stated during our recent meeting that the SW6 monitoring reports are currently derived from the pond in LWS. Our records show that in 2015, CC advised NRW that SW6 was located at Outfall D and in 2017 CC advised NRW that the pond was being monitored as SW7 (to identify trends).

Action: Please advise on the dates when monitoring results submitted for SW6 derived from the pond in LWS.

When considering ongoing monitoring of SW6, CC should consider the closure plans inclusion of SW6 at outfall D and the most recent HRAR including a recommendation for the continued monitoring at SW1-SW6 (SW6 at outfall D). CC should ensure that the surface water monitoring meets the relevant guidance requirements [EA guidance link](#).

A site visit will be arranged in the near future to review provisions for reporting in the sites EMS and the monitoring of outfall D/ SW6.

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.