

Compliance Assessment Report CAR_NRW0050294

Permit being assessed: TP3298FH.

For: Nantycaws Landfill Phase 1, **held by:** Carmarthenshire County Council

At: Nantycaws, Carmarthen, Carmarthenshire, SA32 8BG.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 07/01/2026.

Parts of permit assessed: Annual Report 2024 Review.

NRW Lead Officer: Sally Wakeford.

Report sent to: Environment Department, Carmarthenshire County Council, on 07/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
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?

No action required.

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

Annual Report 2024

This Compliance Assessment Report is from a review of the Annual Monitoring Report for 2024 submitted to NRW on 14 October 2025.

Observations:

- **ACTION: SW/1 needs uncovering to enable safe access for sampling.**
- **ACTION: Headworks improvements required to some wells.**
- Continue to monitor for leachate breakouts etc where dwarf trees have established to the northern and western boundaries.
- Exposed and damaged HDPE membrane on southern bund. **ACTION: undertake any necessary repairs or maintenance.**
- Suspected perched leachate.
- Leachate spot sampling levels at L1 – maximum value well within control levels for Ammoniacal Nitrogen, Chloride and Potassium.
- Groundwater monitoring chemistry – maximum values are well within control and trigger levels for Ammoniacal Nitrogen, Chloride and Potassium in the down gradient boreholes.
- Gas monitoring – gas wells contain groundwater, so not ideal.
- BH116 noted as containing up to 6% methane over the recent years.
- **ACTION: Keep an eye on the electrical conductivity over time, as further data is gathered.**

Topographic Survey

A Topographic Survey and Settlement Assessment is required every 5 years starting 2015. Therefore it was due in 2025 according to our records.

ACTION: Please confirm if completed and provide once report is finalised.

Leachate monitoring:

Leachate level and leachate discharge composition and French Drain On-site measurement of composition (when flowing) monitoring is not part of this annual report. It is noted within this report *“Geotechnology understands that CCS has appointed Excal to manage the leachate treatment system. It is unknown if the new contractor has been requested to continue to undertake the monitoring identified – this monitoring was previously undertaken by WEBS”*

ACTION: Clarification is needed on the monitoring and management of the leachate on Phase 1. Provide the report on the leachate monitoring if being undertaken.

Monitoring requirements

The following requirements would be expected to be seen within this Annual Report, as undertaken by Geotechnology.

- Downgradient Groundwater – BH101, 103, 104, 105, 117 Level Quarterly

- Downgradient Surface Water – SW1, SW4 Composition Quarterly
- Perimeter landfill gas - BH102, 106, 107, 109, 110, 111, 113, 114, 115, 118, 119, 120 Composition Quarterly

Appendix 1 – Laboratory Certificates are provided for the following samples on the following dates (1 means the sample data is present within this annual report):

Samples taken	03/03/2024	20/06/2024	02/08/2024	17/10/2024
Groundwater				
BH101	1	1		1
BH103	1	1		1
BH104	1	1		1
BH105	1	1		1
BH117	1	1		1
BH10	1		1	
Surface Water				
SW1 NYC	1	1		1
SW2 NYC	1			1
SW4 NYC	1	1		
Pipe Discharge	1			
Wern SW2		1		1
Wern SW4	1	1	1	1
Influent	1	1	1	1
Effluent	1	1	1	1
Runoff				1
Leachate				
L1			1	1

Groundwater monitoring boreholes and SW NYC points appear to be missing from the annual report for August. From the other samples provided for 02/08/2024 samples it is assumed that this is an oversight and the data is simply missing rather than not undertaken.

If this is an oversight, then the monitoring has been undertaken to the correct frequencies as stipulated in the permit.

Report does not include any landfill gas monitoring results including perimeter landfill gas. Gas results are discussed in section 8 however the data is not contained in the appendices.

BH116 has been giving readings of up to 6% in recent years, but the report does not discuss the data from this year, nor a comparison to emissions limits which are 3%.

ACTION: Please provide further information on the perimeter borehole monitoring and investigate CO₂ exceedance at BH116 and assess mitigation required.

Summary of Actions:

- SW/1 needs uncovering to enable safe access for sampling
- Headworks improvements required to some wells.
- Keep an eye on the electrical conductivity over time, as further data is gathered.
- Provide topographical survey from 2025.
- Provide further information on the perimeter borehole monitoring and investigate CO₂ exceedance at BH116 and assess mitigation.
- Assess requirement for capping maintenance at damaged area on southern flank.
- Clarification on leachate monitoring (Leachate level and leachate discharge composition and

French Drain On-site measurement of composition (when flowing) monitoring). Provide the report on the leachate monitoring if being undertaken.

END

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

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resource 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 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 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 – Emissions to water, air or 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.

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.