

Compliance Assessment Report CAR_NRW0050878

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: 31/12/2025.

Parts of permit assessed: Annual returns.

NRW Lead Officer: Lewis Evans.

Report sent to: Site Manager, Site Manager, on 27/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2K - Installations - Operations - Landfill gas management (only applicable to landfill)	C3 Minor	2.10.2
IR4C - Installations - Information - Notification	C4 No impact	4.3.2
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.7

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

Total non-compliances recorded	Total non-compliance score
3	8.1

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
IR2K	Action: Strengthen the contract you have in place with the generator provider so they are able to deliver during holiday periods.	30/04/2026
IR4C	Action: Update site procedures to enable NRW being notified	30/04/2026

Criteria	Action needed	Complete by
	of a permit breach by 30th April 2026.	
IR3A(2)	Action: Provide a root cause analysis of the exceedance by the 30th of April 2026.	30/04/2026

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 Limited - Trecatti Landfill

Permit Reference - EPR/RP3733PC

Annual Returns - Monitoring Data

Surface Water

Sampling for monitoring points SWA and SWB have been fully completed for the 2025 monitoring year. During the routine assessments carried out earlier in the year, a number of analytical results appeared to show potential exceedances of permitted limits. These instances were documented and discussed in a previous CAR.

Among the parameters flagged, the pH readings at both monitoring points initially indicated values marginally outside the permitted range. However, the uncertainty reported with each result it was confirmed that the pH values, once uncertainty was applied, fell within the acceptable compliance limits set by the permit.

Leachate Levels

Leachate level monitoring for LW1, LW2, LW3, LW5, and LW7 confirmed full compliance with the permitted leachate level limits throughout the 2025 monitoring year. These wells consistently remained within the required thresholds, with no exceedances recorded during any of the monitoring periods.

At the start of the year, LW4, LW6, and LW8 recorded elevated leachate levels, placing them out of compliance with their respective permit limits. These exceedances were previously documented and addressed within an earlier CAR. Subsequent monitoring showed that all three wells returned to compliance and remained within acceptable limits for the rest of the year.

The elevated levels observed early in the year have been attributed to a combination of operational factors, including:

- Pump failures, which temporarily reduced the effectiveness of the leachate extraction system;

- Scheduled maintenance activities, during which pumping operations were paused; and
- The location of the wells within the active operational area, where infrastructure may be temporarily taken offline during site works or safety-related suspensions.

These factors collectively explain the temporary exceedances recorded. Importantly, once pumps were repaired and routine operation resumed, levels stabilised and remained compliant thereafter.

Treated Effluent

During 2025 69,901m³ of treated effluent was discharged to sewer. All parameters were within the permitted limits. It is noted that in February the treatment biomass has died which resulted in no samples being taken.

Groundwater Levels

Groundwater level monitoring throughout 2025 showed minimal variation across the network. The minor rises and falls recorded during the year are consistent with normal seasonal fluctuations, which commonly reflect variations in rainfall, evapotranspiration, and recharge patterns. It is also noted that groundwater behaviour at the site may be influenced by activities at the adjacent quarry, where groundwater extraction has recently ceased. The cessation of dewatering could alter the local hydrogeological regime, potentially increasing groundwater levels over time. This interaction may warrant further investigation to better understand any long-term impacts on the site's groundwater conditions.

A CCTV investigation of borehole GW11 identified a significant narrowing of the borehole, likely caused by mineral deposition and biological growth. This constriction prevents the dip probe from passing, limiting the ability to obtain accurate manual groundwater level measurements. A similar issue has been observed at GW7, which is located adjacent to GW11. Although the dip probe can pass in GW7, the internal obstruction makes it difficult to obtain reliable readings, reducing confidence in the data collected.

Additionally, the GW3 borehole has collapsed, preventing the probe from passing altogether and thereby rendering the well inactive for monitoring purposes. A replacement or rehabilitation strategy may be required to restore full monitoring capability at this location.

Perimeter Gas

The perimeter gas levels have varied in 2025. At the start of the year, BH44 and BH22 exceeded parameters for Methane and Carbon Dioxide. The results returned to compliance and BH22 breached the emission limit for Methane (CH₄). A schedule 5 was submitted as part of the annual returns.

Permit condition 3.1.7 states

“The limits for landfill gas arising from the installation set out in schedule 3, tables S3.6 and S3.7 shall not be exceeded.”

Due to the exceedance in CH₄ in November, a **Category 3 non-compliance** will be scored against permit condition 3.1.7.

Action: Provide a root cause analysis of the exceedance by the 30th of April 2026.

Gas Compound

The flare had flared 120,040m³ of LFG in 2024 and used 11,359,765m³ of LFG in the engines.

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.

Complaints

There were a total of 9 complaints made to the site in 2025. Investigations made by NRW officers could not evidence this arising from site. Additionally, site personnel investigated when complaints came in and highlighted that the site was operating normally and no odours were observed by site.

Non-Compliance 24th December 2025 (Mains Failure)

On the 24th of December 2025 at approximately 21:00, there was a high voltage switch gear failure outside the permitted area on the mains grid which caused a power outage on site. As a result the site was not able to treat the landfill gas until approximately 10:00 on the 26th of December 2026.

During this period, the operators on site had contacted companies to hire diesel generators in order to run the flare while the power to site was absent. However, due to the timings of the failure (Christmas Eve/Christmas Day) there were some delays in being able to get the generators to site, and power was restored by the national grid before generators had arrived. The operators gas management plan states that a mobile generator needs to be arranged to arrive on site. NRW understand that this was a difficult time with it being the Christmas period but there should be a better agreement with the contractor to arrange delivery of a generator in these circumstances.

Permit Condition 2.10.2 states:

The operator shall take appropriate measures, including, but not limited to, those specified in any approved landfill gas management plan, to:

- (a) collect landfill gas; and
- (b) control the migration of landfill gas.

The operator had carried out a number of steps to reduce the impact such as having 1.5mm of HDPE temporary capping and the use of inert material to cover the waste in the tipping area. Additionally, the area the tipping takes place on is minimal in size and is covered daily to industry best practice. The site has a wide gas containment infrastructure which aids gas collection when systems are operating.

However, due to the power failure, the operator was unable to treat the landfill gas that was being generated and as per their gas management plan failed to obtain a mobile power supply. Therefore a **Category 3 non-compliance** will be scored against this permit condition.

Action: Strengthen the contract you have in place with the generator provider so they are able to

deliver during holiday periods by April 30th 2026.

Permit Condition 4.3.2 states:

“Any information provided under condition 4.3.1 (a)(i), or 4.3.1 (b)(i) shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule”

The operator did not notify NRW until the 2nd of January 2026 and as a result a **Category 4 non-compliance** will be scored against this condition. It has been taken into account that the failure took place late Christmas Eve into Christmas Day, however the notification was not submitted to NRW until a week later.

In the event of any failure which results in a permit condition being breached, NRW must be notified immediately via email or phone call. The operator should have procedures in place so that if staff are on annual leave or sick, other competent staff members have the ability to notify NRW.

Action: Update site procedures to enable NRW being notified of a permit breach by 30th April 2026.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.