

Compliance Assessment Report CAR_NRW0051247

Permit being assessed: BU0800IZ.

For: Llanddulas Landfill EPR/BU0800IZ, **held by:** 3C Waste Limited

At: LLANDDULAS QUARRY ABERGELE ROAD , LLANDDULAS, ABERGELE, ABERGELE, LL22 8HP.

Type of assessment: Other,

Reason: Other.

On: 24/02/2026 between 10:00 and 12:30.

Parts of permit assessed: 2.9 Leachate Levels.

NRW Lead Officer: Anthony Roberts.

Report sent to: Chris Bennion, Area Manager, on 31/03/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2I - Installations - Operations - Leachate levels (only applicable to landfill)	C3 Minor	2.9 Leachate Levels

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
IR2I	Reduce leachate levels until compliant	10/04/2026

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.

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

Schedule 6 Notification Part A/B – Leachate Head Breach

2.9 Leachate level

Permit Condition

2.9.1 The limits for the level of leachate listed in schedule 4 table S4.1 shall not be exceeded.

4.3 Notifications

Permit Condition:

4.3.1 The Agency (NRW) shall be notified without delay following the detection of:

(a) any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing or may cause significant pollution;

(b) the breach of a limit specified in the permit;

(c) any significant adverse environmental effects.

Schedule 4 – Emissions and monitoring

Table S4.1 Leachate level limits and monitoring requirements require leachate levels in monitoring wells below 2m.

The Schedule report of permit breach for leachate level in-well, dated 12-02-2026 in leachate well LMP2 at 3.25m and LMP3/2 at 12.49m, shows this is over the 2m permit limit. **The score for this breach is a CCS3 minor breach.**

During the site follow up inspection actions detailed below had been started and the wells in question were approaching compliance. **All works detailed below to be completed by the 10th April 2026**

ACTION: All required actions have been undertaken as detailed in the Schedule response from FCC as reproduced below:

FCC LT & DB assessed the LMP3/2 chamber on 11/02/2026. The chamber is situated at the lowest end of a valley feature, in-between the current soils tipping area and the recently engineered capping area. With the current persistent heavy rain, the liquid level has elevated surprisingly quickly since the previous round of dips. The elevation, however, appears localised - all other chambers in the surrounding area have returned fully compliant dips. Pumping was investigated by FCC LT & DB on 11/02/2025 upon immediate receipt of the level data on site. LT and DB identified pumping issues and attempted to pull the pump by hand, however it is heavily impacted by gel and was too heavy to remove by hand. A recurring problem with polyacrylate gel entering the chamber and restricting pumping once again was confirmed. The chamber was last desilted in 2025 for the same reason. Rodding of the chamber and measurements were taken on 11/02/2026 to confirm the approximate depth of gel in the chamber for specialist contractor use. The

desilting rig is still on site. FCC have arranged an electric pump and generator to quickly reduce the elevation. The chamber will be thoroughly desilted to regain pumping depth and a newly serviced top-loader pump will be installed upon completion. The deadline for this work has been suggested for 27/02/2026 due to the very wet site conditions and current poor access to LMP3/2. The elevated level at LMP2 of 1.25m above limit has been investigated. The pumping rate has been increased at LW1AR which will act to reduce the level at LMP2 via hydrostatic levelling. Pumping force was found to have been reduced at LW1AR due to the installation of a protective enclosure for the air regulator, as part of a scheme of improvement works to help system components last longer. Unfortunately, post installation, the contractor had not increased the regulator pressure sufficiently to provide great enough pumping force at LW1R. This has now been rectified with the regulator adjusted from 4 bar to 7 bar pressure. The level should soon return compliant at LMP2 with these amendments made. Follow up level checks will commence before the next round of compliance dips.

Fast liquid elevation at LMP3/2 appears to have been caused by two main factors. Pump clogging issues, and large volumes of surface water channelling directly towards the chamber located at the bottom of a valley feature, overwhelming the already struggling pump

Specialist contractor arranged to visit site with electric pump to quickly reduce the LMP3/2 liquid elevation. Desilting rig is on standby at the site to remove gel from chamber and regain depth. Newly serviced VP4 top loader pump to be installed which will provide the greatest pumping reliability in LMP3/2. Pumping solutions have been sought from FCC engineering and the leachate delivery manager due to investigation confirming recurring polyacrylate gel build up.

The LMP3/2 elevation is localised upon review of the surrounding chamber dips. Priority action has been directed towards the quick reduction of the liquid level at LMP3/2 and all specialist contracted works are expected to be complete by Friday 27th February

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.