

Compliance Assessment Report CAR_NRW0050897

Permit being assessed: MP3835SV.

For: Silent Valley Landfill Site, **held by:** Blaenau Gwent County Borough Council

At: Beechwood House , Ebbwvale, Blaenau Gwent, NP23 6PZ.

Type of assessment: Check Monitoring/Sampling,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: Annual reporting & monitoring.

NRW Lead Officer: Neil Griffiths.

Report sent to: REDACTED, Technical Manager, on 18/05/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	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

This Compliance Assessment Report (CAR) has been produced in response to the submission and review of annual performance and the Quarter 4 monitoring report(s) required by environmental permit conditions 4.2.2 and 4.2.3.

Not all permit conditions have been reproduced in this CAR but are available in environmental permit number: EPR/MP3835SV.

1. Leachate quality monitoring

Reports submitted to NRW demonstrate that leachate quality monitoring was undertaken on the following quarters – 29/01/25 (Q1), 13/05/25 (Q2), 30/07/25 (Q3) and 12/12/25 (Q4).

Reports submitted to NRW demonstrate that leachate quality monitoring results were reported for the following quarters – 30/04/25 (Q1), 31/07/25 (Q2), 31/10/25 (Q3) and 30/01/26 (Q4).

This represents compliance with the environmental permit in terms of leachate quality monitoring and reporting.

Reports submitted to NRW demonstrate that Allowable Maximum Concentrations (AMCs) were exceeded at individual leachate monitoring locations/wells, for either nickel or ammoniacal nitrogen 12 times throughout, 2025.

There are no leachate quality emission limits within the environmental permit. Therefore, no breach of an environmental permit condition has been recorded.

Monthly average AMCs across the 4 leachate monitoring locations/wells were not exceeded throughout 2025.

NRW currently agrees to the approach - '*File Note: Silent Valley Landfill, Job number 115825-00, File reference 7-70, 15 August 2024*'

As per that approach, NRW has not set any actions for the operator to complete in respect of AMCs.

2. Leachate level monitoring

The mean leachate head as measured in wells across site has not exceeded the 3.0m head limit, with the exception of L1B. This well is located in the base of the old valley and likely to reflect the inflow of groundwater and therefore does not represent a head of leachate over the boulder clay

layer that will generate leakage. For this reason, the levels in well 1B are not included in the monthly averages. This represents compliance with the environmental permit.

The operator has monitored the leachate head along BSC pipe weekly, which represents compliance with the environmental permit.

It has been noted that the maximum leachate head has decreased by 0.05m from 2024 to 2025 as detailed in Table 1 of the report.

3. Upstream surface water quality monitoring

Results show all upstream surface water locations have met the freshwater Environmental Quality Standards (EQS) concentrations during 2025 with exception of unionised ammoniacal nitrogen at SW2AI in Q4.

There are no upstream surface water emission limits within the environmental permit. Therefore, no breach of permit condition has been recorded.

4. Downstream surface water quality monitoring

Results show all downstream surface water locations have met the freshwater EQS concentrations during 2025.

There are no downstream surface water emission limits within the environmental permit.

5. Upstream groundwater monitoring

Levels of manganese above the assessment level have been recorded in GW4.

There are no upstream groundwater emission limits within the permit. Therefore, no breach of permit condition has been recorded.

6. Downstream groundwater monitoring

Zinc

Reports submitted to NRW demonstrate that the trigger level for zinc in monitoring point GW12 was exceeded once in 2025 – meaning permit condition 3.1.5 was breached.

NRW however acknowledges the operator's approach to single exceedances of groundwater monitoring trigger levels from section 3.9.5 of the Aftercare Phase Environmental and Infrastructure Monitoring Program (APEIMP).

The APEIMP is incorporated into the environmental permit via Table S1.2 Operating techniques.

The current APEIMP approach is accepted for the 2025 monitoring reports and therefore no permit breach recorded in this instance.

Manganese

Levels of manganese above the assessment level have been recorded in GW6, GW7, GW9, GW10 and GW12 in various quarters on 15 occasions.

There are no downstream groundwater emission limits for manganese within the permit. Therefore, no breach of permit condition has been recorded.

Sulphate

Levels of sulphate above Control Level B have been recorded in GW12 in Oct 2025.

The downstream groundwater emission limit for sulphate within Table S3.3 of environmental permit has not been exceeded. Therefore, no breach of permit condition has been recorded.

Ammoniacal Nitrogen

Levels of ammoniacal nitrogen above the trigger level of 1 mg/l found in Table S.3 have been recorded on three separate occasions. Dec 2024 – 3.70mg/l, Jan 2024 – 4.7mg/l, and Jan 25 – 4.10mg.

The downstream groundwater emission limit for ammoniacal nitrogen within Table S3.3 of environmental permit has been exceeded.

However, the footnote at the bottom of Table S3.3 states the following, GW9 ammoniacal nitrogen and chloride limits to be disapplied pending review of IC1b report for pumping of groundwater and leachate conclusions.

Therefore, the GW9 ammoniacal nitrogen emission limit exceedances referred to above do not represent non-compliance with the environmental permit at this time.

7. Landfill gas external borehole monitoring

Methane

Reports submitted to NRW demonstrate that the GMW2 and GMW14/14A methane trigger limits were each exceeded once in 2025 – meaning permit condition 3.1.7 was breached twice.

NRW however acknowledges the operator's approach to single exceedances of [landfill gas] monitoring trigger levels from section 3.9.5 of the APEIMP.

The APEIMP is incorporated into the environmental permit via Table S1.2 Operating techniques.

The current APEIMP approach is accepted for the 2025 monitoring reports and therefore no permit breach recorded in this instance.

Carbon Dioxide

There are no carbon dioxide emission limits within the permit. Therefore, no breach of the permit has been recorded.

8. Landfill gas from capped surfaces

On 19th June 2025, in CAR_NRW0048588, NRW agreed to accept flux box testing to measure landfill gas emissions from capped surfaces. A flux box survey frequency of every five years was accepted in CAR_NRW0048588. The last Flux Box Survey Report was received in September 2021. The next Flux Box survey is due this year, i.e., 2026.

9. Other landfill gas monitoring parameters

Emails from the operator to NRW demonstrate that the other landfill gas monitoring parameters, required by Table S3.6, namely: in waste gas extraction wells; input to LFG compound; and flare on gas compound, were submitted on 30 January 2026. This represents compliance with the environmental permit.

10. Topographical survey

It was agreed in CAR_NRW0048588 dated 19th June 2025 that topographical surveys could now be carried out every five years. The most recent survey was received in 2021 so another is due this year, i.e., 2026

If you have any queries about this CAR, please contact Luke Burton

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.