Compliance Assessment Report CAR_NRW0052058

Permit being assessed: AB3196HG

For: Trehir Former Landfill Site, **held by:** Caerphilly County Borough Council

At: Pandy Lane, Llanbradach, Caerphilly, CF83 3RP.

Type of assessment carried out: Other,

Reason: Other.

On 21/04/2026, between 11:00 and 13:00.

Parts of permit assessed: Site infrastructure

NRW Lead Officer: Elis Nuttall.

Report sent to: Nicole Campbell, Technical Assistant, on 09/06/2026.

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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-A1 - Water Quality - Management - General management	Action only (X)	
WQ-A1 - Water Quality - Management - General management	Action only (X)	
WQ-A1 - Water Quality - Management - General management	Action only (X)	
WQ-B1 - Water Quality - Operations - Permitted activities	C3 Minor	3.1.1 - Discharge Location

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-A1	Investigate all CCBC infrastructure related to the management of site drainage and identify the issues which are preventing the drainage system from operating as designed.	07/07/2026
WQ-A1	Engage with DCWW and request that they investigate their infrastructure at site and identify any issues	08/08/2026
WQ-A1	Undertake repairs on all identified issues (both CCBC and DCWW assets) and bring the system back into operating order as designed. Evidence should be provided of all work	08/09/2026

Criteria	Action needed	Complete by
	once completed.	
WQ-B1	Return the site drainage to its permitted discharge point on the Afon Rhymni.	08/09/2026

Action 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

Site Visit Report

This report details the site visit made by Natural Resources Wales (NRW) on the 21/04/2026 to Trehir Former Landfill Site, permit reference number EPR-AB3196HG.

I (NRW Environment Officer Elis Nuttall) attended Trehir Former Landfill Site at 11:00 where I met with Caerphilly County Borough Council (CCBC) officers NC and JT.

The purpose of this visit was to investigate the site drainage infrastructure to confirm if the site runoff is discharging via the permitted point and if not where the discharge is going.

The weather was clear and dry at the time of the visit.

General Observations

This former landfill site, which now operates as a civic amenity site, holds a permit to discharge trade effluent consisting of groundwater and surface run-off contaminated with leachate. The consented limits associated with this permit are as follows:

- Suspended solids: 100 mg/l
- ATU-DOD as O2: 72 mg/l
- Ammoniacal nitrogen: 20 mg/l
- pH: 6 to 9
- Total Copper (Cu): 140 µg/l
- Total Zinc (Zn): 900 µg/l
- Total Cadmium (Cd): 6 µg/l
- Total Lead (Pb): 280 µg/l
- Total Chromium (Cr): 80 µg/l
- Total Iron (Fe): 14000 µg/l
- Total Nickel (Ni): 100 µg/l
- Total Phenol : 28 µg/l

- Visible oil or grease: No significant trace present

There are no flow monitoring consent limits associated with this permit, only that 15 minute instantaneous or average flow measurements are taken.

Flow monitoring point is located as ST1517589747. The discharge and sample points are located at ST1507089747.

The site was operational at the time of the visit.

Site Infrastructure Investigations

I met with NC and JT and began the visit with a general discussion on site history and my involvement and understanding of the drainage layout from previous compliance visits. It was confirmed that NRW's Environmental Assessment and Advice Team (EAAT) have not been able to sample from the permitted discharge/sample point due to both access and no flow issues. Previously EAAT have sampled the side drainage from a manhole near the telemetry/flow monitoring point at ST1517589747, but sampling from this point was ceased due to speculation that it was not discharging to the permitted point, rather running into Dŵr Cymru Welsh Water's (DCWW) foul network. As such this was potentially not representative of site drainage. We then proceeded to inspect the site infrastructure.

Beginning by checking the access to the sample point it was found to be accessible and at the correct listed point. CCBC have previously undertaken works to improve and maintain access to the sample point due to previous access issues. While access was good, there was no discharge from this point at the time of the visit and no outlet pipe could be identified despite probing the eroded void with a branch. As such it was concluded that there has not been any discharges from this point for a significant period of time. These observations can be seen in Figure 1. Please note, the photo in Figure 1 is from a previous compliance visit but is an accurate depiction of the conditions observed during this visit.

Figure 1 – The conditions of the sample/discharge point similar to that observed during the visit.

We proceeded to check several possible discharge points along the river to ensure there were no discharges present that could be coming from site, but no such discharges were found. We decided to begin investigations from the last known point where site drainage is present near the flow monitoring point.

On arrival at the flow monitoring point near ST1517589747 several chambers were identified around the telemetry box. The first chamber was lifted and found to contain input from an upstream line (which is assumed to be the site drainage), an outlet pipe (where no discharge was leaving the chamber), a sensor to monitor flow as well as a penstock which NC described as an emergency overflow which opens during heavy flows to allow the discharge to enter the foul drainage network to alleviate pressure on the consented discharge line. As noted, there was no flow entering the outlet pipe despite there being a constant input, indicating that the discharge was escaping this chamber somewhere rather than using the consented discharge point. These observations can be seen in Figure 2.

Figure 2 – Chamber lifted where site drainage was observed entering but not leaving during the visit.

I decided to dye trace this chamber to see where the water was discharging. This was undertaken at 12:19 using green dye. On returning to an observation point where the permitted discharge point could clearly be seen it was confirmed that no dye was seen at any location along the section of river upstream or downstream of this point. This can be seen in Figure 3.

Figure 3 – Conditions on the river after undertaking the initial dye tracing during the visit.

On returning the flow monitoring point I attempted to lift the two chambers directly downstream of the first chamber, however the covers were stuck and were unable to be removed for inspection. No flow could be heard clearly from the chambers, indicating the previous observation that no flow was passing into the permitted discharge line was correct.

On lifting the chamber known to be the overflow channel to the DCWW foul network, a significant volume of water was observed to be discharging to the foul network via a V-notch. Additionally, a small amount of green dye was seen on the V-notch, indicating the previously dyed water in the prior chamber was making its way into the foul line. On re-dying the first chamber green dye was clearly seen entering the foul line, providing the necessary evidence that the site drainage was discharging completely to the foul line at the time of the visit. This was confirmed when checking the telemetry for each sensor with the site drainage showing a discharge of $0m^3/s$ and the DCWW overflow showing a discharge of 0.7l/s. At the time of the visit it was assumed that the penstock which controls flows to the overflow has somehow become stuck open, allowing all site drainage to discharge via the foul line. These observations are evidenced in Figure 4.

Figure 4 – Evidence to support that site drainage is discharging to the DCWW foul network and not via the permitted point.

From top to bottom, left to right: Initial observations of the overflow channel, the overflow channel after re-dying the discharge chamber, telemetry readout for the site drainage line, telemetry readout for the overflow to the foul line.

The following diagram (Figure 5) has been created to enable CCBC to visualise the

observations made:

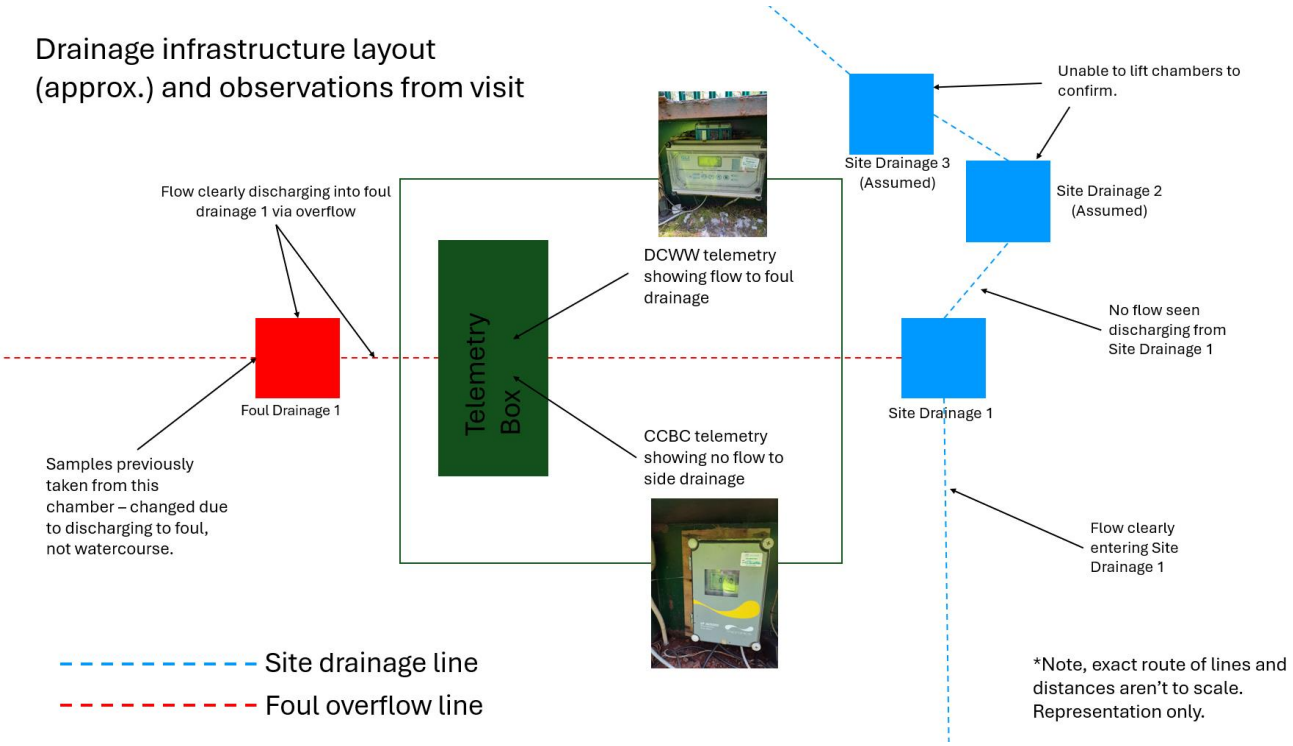

Figure 5: Drainage infrastructure layout and observations made during the visit.

From these observations the following was evident:

1. The site drainage is not discharging via the permitted discharge point.
2. The site drainage is discharging via the DCWW foul network.
3. The overflow penstock in Site drainage 1 chamber is allowing water to discharge via foul line rather than flowing forward to the discharge point.
4. The cause of the fault is unknown at this time.

On discussing this with NC and JT they agreed with my observations and conclusions. As such, my recommendation is that the drainage infrastructure around the flow monitoring point, specifically the operation of the overflow penstock, be reviewed by CCBC and maintenance undertaken to restore it to the correct operating conditions. DCWW should also be contacted to assess their infrastructure and carry out necessary works to rectify any issues found. This is reflected in the actions list below.

Due to the discharge being made to the foul sewage network I have no concerns that the discharge is posing any environmental risk, however it is still classed as a breach of permit conditions as it is not discharging to an unpermitted receptor. Additionally, permanent increased flows could cause hydraulic overloading of the foul network, causing capacity issues down the line. As such I would prioritise returning the site discharge to the permitted line as soon as practicable. This was discussed with NC and JT who agreed.

No further questions were asked during this visit. I left site at 13:00.

Breaches of permit condition

1. CATEGORY 3 BREACH – PERMIT CONDITION 3.1.1 – Discharge Location

There shall be no point source emissions to water except from the sources and emission points listed in schedule 3.

The site drainage was clearly seen discharging via the overflow channel (which in turn discharges to the foul network), bypassing the permitted site drainage and the permitted discharge point (located at ST1507089747).

Please see report content for further justification.

Action required by dates specified:

1. Investigate all CCBC infrastructure related to the management of site drainage and identify the issues which are preventing the drainage system from operating as designed.

Deadline: 08/07/2026

2. Engage with DCWW and request that they investigate their infrastructure at site and identify any issues.

Deadline: 08/08/2026

3. Undertake repairs on all identified issues (both CCBC and DCWW assets) and bring the system back into operating order as designed. Evidence should be provided of all work once completed.

Deadline: 08/09/2026

4. Return the site drainage to its permitted discharge point on the Afon Rhymni.

Deadline: 08/09/2026

If we do not receive the information requested within specified deadline and have not been informed as to why there is a delay then we may serve a Regulation 60 Notice requiring the information under Environmental Permitting (England and Wales) Regulations 2016.

Advisory Comments

No advisory comments at this time.

Contact details

If you have any queries regarding this CAR form or to provide an update on any actions above, please contact me using the following details: Elis Nuttall, Environment Officer,

elis.nuttall@naturalresourceswales.gov.uk, 03000 65 4651.

Thank you,

Elis Nuttall.

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 to 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
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

Full list of water quality action criteria (used in section 1 and 2):

WQ A: Management

- WQ-A1 General management

WQ B: Operations

- WQ-B1 Permitted activities
- WQ-B2 The site
- WQ-B3 Operating techniques
- WQ-B4 Improvement programme
- WQ-B5 Pre-operational conditions

WQ C: Emissions and monitoring

- WQ-C1 Emissions to water
- WQ-C2 Emissions to land
- WQ-C3 Emissions of substances not controlled by emission limits
- WQ-C4 Monitoring
- WQ-C5 Installation of monitoring boreholes

WQ D: Information

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

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.