

Compliance Assessment Report CAR_NRW0052444

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: Site Inspection,

Reason: Other.

On: 09/07/2026 between 10:00 and 12:30.

Parts of permit assessed: 1.1 Management, 2.9 Leachate Levels.

NRW Lead Officer: Anthony Roberts.

Report sent to: Chris Bennion, Area Manager, on 21/07/2026.

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
IR2K - Installations - Operations - Landfill gas management (only applicable to landfill)	C3 Minor	1.1 General Management and associated documents

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

Total non-compliances recorded	Total non-compliance score
2	8

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	Further investigation of polyacrylate well blockage and investigate re-drill.	28/08/2026
IR2K	Clear condensate and relay/reconnect gas pipe-work.	14/08/2026

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

Llanddulas Landfill – Compliance Inspection

09/07/2026

Leachate Management and Associated Gas Management - Schedule Notification Part A/B – Leachate Head Breach and Condensate Management.

Summary:

Leachate well LMP3/2 remains in breach of permit limits and a further schedule notification for this breach has been received by NRW. The pipe connecting this leachate well to the extraction system was partially blocked with condensate which could be heard pulsing inside the pipe. As such the compliance score is CCS 3 x 2.

The permit condition(s) relating to these breaches are listed below:

2.9 Leachate levels

Permit Condition:

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

Schedule 4 – Emissions and monitoring

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

1. Management (Condensate In Gas System)

1.1 General management

1.1.1 The activities shall be managed and operated:

(a) in accordance with a management system, which identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents and non-conformances and those drawn to the attention of the operator as a result of complaints; and

(b) by sufficient persons who are competent in respect of the responsibilities to be undertaken by them in connection with the operation of the activities.

Leachate Management

The latest schedule report of permit breach for leachate level, follows the previous one in leachate well LMP3/2, The level was 5m above basal layer on the 27/05/26 and 6.61 on the 08/07/26. This is a slight increase on the previous schedule notification.

Site Response:

Site management and the FCC environment department have responded with the following comments:

Elevated leachate level within LMP3/2 is largely due to formation of a polyacrylate gel inside the chamber which impedes the operation of any pneumatic pump type. FCC opted in favour of a high-power electric pump installation, with the hope that the pump would be able to deal with the thick gel much more effectively than previous pumps. The level in LMP3/2, while still non-compliant, has significantly dropped over the months. Pumps and levels here continue to be closely monitored.

During the site compliance meeting and inspection FCC also added the following actions and comments:

They used an electric pump and generator and agitated liquid with desilting aeration. That brought the level down and in the attempt to get further they attempted a de-silt which did not work. Reduction in level but only to 4.8m

The de-silt and camera on a spool showed a solid base, at the bottom of the well significantly above the basal AOD. The desilting rig was taken away and further camera investigations at depth were undertaken.

ACTION: Base of well and plug AOD and differential to be confirmed by the 30th August 2026

FCC believe the material at the base of the well, is a gel like substance which started to appear two years ago, a polyacrylate waste from clinical waste such as nappies is the likely source.

ACTION: Site to confirm composition/analysis of polyacrylate waste at base of LMP3/2 leachate well.

FURTHER ACTIONS:

Due to solid nature of the base a re-drill is proposed to insert a new leachate well but this must be far enough away from the original to avoid the gel but still intercept leachate at the base.

They will speak to head of engineering to establish this from the basal plans. FCC, stated that they will need the time to get this right with significant capex required. Leachate well LMP3/2 is in cell 3A and they propose to take the levels from well LCP3 in the same cell.

Basal drawings show the leachate levels in LCP3 which can be extrapolated to LMP3/2, this will act as a proxy for LMP3/2

The conclusion will be a re-drill and a request has been submitted to the engineering department but may not be possible this year.

LCP3 is fully compliant this month's dips are due, then as the footprint of the cell is relatively small and therefore LCP3 is a good proxy for the leachate head in this cell.

All other leachate wells are compliant on site.

ACTION: FCC to submit a leachate action plan for LMP3/2, with schedules for completion by the 30th August 2026.

The re-drill of leachate well 3/1 has been delayed due to site conditions and H&S issues. A good soil platform and improved site conditions has enabled the re-drill to take place.

Pumps are now installed and are awaiting Initial data from the well to update.

Gas Management

The gas extraction pipework connected to leachate well LMP3/2 contained significant amounts of condensate which affects the performance of the extraction system. The pipe-work was not laid to ensure adequate condensate-free drainage.

ACTION: The condensate in the line must be drained and the pipe laid to the correct fall or connected into the gas main downslope and close to the leachate well as discussed on site. This should be completed within 14 working days of the site inspection date.

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.