

Compliance Assessment Report CAR_NRW0052308

Permit being assessed: BP3330LS.

For: Ty Mawr Farm Landfill, **held by:** Mr Griffith Wyn Griffiths and Mr Edward Lloyd Griffiths

At: Betws Yn Rhos, Abergele, Conwy, LL22 8AA.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 05/08/2026.

Parts of permit assessed: LFGRA, Gas Management Plan, Monitoring, Filling plan.

NRW Lead Officer: Sarah Walton.

Report sent to: Griffith Wyn Griffiths & Edward Lloyd Griffiths, Permit operators, on 07/08/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2C - Waste - Operations - Operating techniques	Action only (X)	
W3A(1) - Waste - Emissions and monitoring - Emissions to water	Action only (X)	
W3A(1) - Waste - Emissions and monitoring - Emissions to water	Action only (X)	
W2C - Waste - Operations - Operating techniques	Action only (X)	

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?

Criteria	Action needed	Complete by
W2C	Implement recommendations for Landfill Gas Risk	02/10/2026

Criteria	Action needed	Complete by
	Assessment and Gas Management Plan	
W3A(1)	Submit monitoring data for Chloride and Ammoniacal Nitrogen at GW1 for quarter 1 and quarter 2 2026.	21/08/2026
W3A(1)	Provide an interpretive report of groundwater levels at GW1 for the past 12 months. Assess readings against the site's HRA and conceptual model. Include any recommendations as a result.	04/09/2026
W2C	As an recommendation, it is advised a few annotations are added to the filling plan such as arrows for the direction of fill, along with a brief statement of how the waste will be progressively placed on the slopes using specified plant.	04/09/2026

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

This report is a review of the Landfill Gas Risk Assessment, Gas Management Plan and monitoring data for quarter 1 and quarter 1 2026.

There are also some comments on outstanding actions regarding the site's filling plan.

Operating techniques

Permit condition 2.3.1

A previous CAR report from 08/12/2025 (CAR_NRW0050043) had the following actions :

- Investigate methane concentrations and flows at LMP, including whether concentrations are peak or steady state, and provide an interpretative report with findings and any proposed actions by Monday 26th January 2026.
- Review LFGRA (Landfill Gas Risk Assessment) and provide recommendations/proposals for NRW approval

The operator submitted the results of landfill gas flow trial on LMP. This trial took place across two days on 21/04/2026 and 22/04/2026.

A revised Landfill Gas Risk Assessment (LFGRA) and Gas Management Plan(GMP) were submitted on 28/04/2026.

Comments on LFGRA and GMP:

- The gas flow trial showed high concentrations of methane in LMP and low flow rates of approximately 0.2l/h. The mean concentration of methane (CH₄) across the flow trial was 23.5%. Across the 2 days of the trial, methane concentration and flow gradually increased.
- The risk assessment makes reference to the inert waste acceptance criteria of the landfill, but does not explore a possible cause for high concentration of methane found in the main body of the waste mass.
- The data so far since the re-installation of the in-waste borehole in 2025, has shown consistently high concentrations of methane in LMP. Currently there is only one 'in waste' borehole. The flow survey took place over 2 days, so may not be representative of how the landfill is producing gas year round with pressure changes etc. The extent of methane generation across the waste mass is not currently known or explored in the Landfill Gas Risk Assessment. It is not known whether gas generation is isolated or wide spread.
- High methane in LMP shown most months other than December and January where 0% methane recorded.
- The GMP contains trigger levels for methane levels found at LMP. The trigger levels have already been breached on three separate monitoring rounds.

Recommendations:

- Conduct further analysis into previous waste acceptance at the site. It has been noted on a number of NRW inspections, that non-inert waste streams have been accepted to site. This can be found in CAR reports.
The 'Schedule 4 response' which is listed as an operating technique in the site permit, contains borehole logs from 2006. These logs show non-inert waste such as wood and plastic. Furthermore, compliance testing of waste should be available to determine historic waste inputs to site.
- In the GMP, incorporate a follow up action plan with corrective actions for when LMP records >1% CH₄ on more than 3 consecutive monitoring rounds.
- Consider further testing such as frequent flow assessments on LMP, installation of a temporary gas clam or a FID walkover survey.
- Permit notes in Table S4.3 that frequency of monitoring of LMP will be reviewed after 12 months. Given that monitoring points have been replaced and have gathered data for 12+months, it is advised that frequency of monitoring is now reviewed.
- Ensure preventative actions to ensure strictly only inert waste accepted. Eg quarantine area.

ACTION: Please consider and implement the above recommendations regarding the site's LFGRA and GMP.

Monitoring

Landfill Gas

No breaches of permit were recorded for methane or carbon dioxide in perimeter boreholes.

Surface water

The environmental permit has requirements for surface water monitoring. There are no compliance limits set out in the permit, however, some parameters are recording over 100% increase between upstream and downstream samples, suggesting the landfill is having some impact on surface waters.

For example, on 10/02/2026, SW1 recorded 51mg/l Chloride and SW2 recorded 110mg/l of Chloride. This is accompanied by increased electrical conductivity and ammoniacal nitrogen.

January surface water results also show a significant increase in Sulphate and Alkalinity (CaCO₃) between the monitoring locations SW1 and SW2.

Groundwater

Table HRA9 in the Schedule 4 response, lists the monitoring locations and sampling requirements. GW1 is required to be sampled monthly for Chloride and Ammoniacal Nitrogen.

Monitoring reports do not contain data for these parameters at GW1.

ACTION: Submit monitoring data for Chloride and Ammoniacal Nitrogen at GW1 for quarter 1 and quarter 2 2026.

Please include these parameter on future reports.

Groundwater level in GW1 recorded the following across quarter 1 & 2 2026:

13/01/2026: 0.24m below ground level

10/02/2026: 0.28m below ground level

11/03/2026: 0.41m below ground level

09/04/2026: 0.62m below ground level

07/05/2026: 1.05m below ground level

01/06/2026: 1.38m below ground level

The groundwater level at GW1 is fluctuating each month but appears to show a downward trend from January to June.

Levels recorded are shallow and should be reviewed against the site's conceptual model and hydrogeological risk assessment(HRA).

ACTION: Provide an interpretive report of groundwater levels at GW1 for the past 12 months. Assess readings against the site's HRA and conceptual model. Include any recommendations as a result.

Filling plan

Permit Condition 2.3.1 *"The Activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1 table S1.2, unless otherwise agreed in writing by the Agency"*

Table S1.2 states "Application The responses to questions B2.1, B2.2, B2.3, B2.4, B2.5, B2.7, B2.8, B2.9 and B2.11 of Part B of the Landfill Application Form" and "Response to schedule 4 notice dated 06 /11/06 - All".

On the previous CAR form, an action was placed on the operator to explain how the tipping of waste on site was being managed to achieve the profiles 'Hydrogeological Cross Section 2058.SRA.01', 'Engineering and Installation details 2058.SRA.02' and 'Restoration 2058.ESID.05' A response was requested in the form of an up-to-date filling plan based on a recent topographic survey.

A filling plan was received on 19/06/2025.

ACTION: As an recommendation, it is advised a few annotations are added to the drawing such as arrows for the direction of fill, along with a brief statement of how the waste will be progressively placed on the slopes using specified plant.

End of comments

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 Waste compliance criteria (used in section 1 and 2):**1. Management**

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – 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.