

## Compliance Assessment Report CAR\_NRW0044998

**Permit being assessed:** PP3139GB.

**For:** Hafod Quarry Landfill Site, **held by:** Enovert North Limited

**At:** Hafod Quarry Landfill Bangor Road, Johnstown, Wrexham, LL14 6ET.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 12/08/2024 between 15:10 and 16:30.

**Parts of permit assessed:** Site inspection .

**NRW Lead Officer:** Jamie Blythin, accompanied by Paul Challender.

**Report sent to:** Regional Manager, Regional Manager , on 21/08/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2K - Installations - Operations - Landfill gas management (only applicable to landfill)	Action only (X)	
IR3C - Installations - Emissions and monitoring - Odour	Action only (X)	
IR3F - Installations - Emissions and monitoring - Pests	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?

Criteria	Action needed	Complete by
IR2K	Action 1- Provide NRW with gas flow data for both landfill gas engines and the flare for the period 01/08/24- 20/08/24.	13/09/2024
IR3C	Action 2: The operator needs to review the site's leachate collection infrastructure to assess the potential pathways for odour and the need for any additional odour abatement e.g. carbon filters. Provide a written update to NRW following completion of this work.	30/09/2024

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 Compliance Assessment Report (CAR) follows a site inspection at Hafod Landfill on 12/08/24 that was carried out in response to a large number of odour reports received by Natural Resources Wales (NRW) between 10/08/24-12/08/24.

### **Odour incidents**

NRW officers completed offsite olfactory monitoring on 11/08/24 and made the following observations:

21:17-New Hall Road- No odours. No wind.

21:24- Vauxhall Industrial Estate- rotting food odour near New Horizons Plastics, fat/ cooking oil odour near Fry Fresh.

21:30- Heol Kenyon- woodsmoke odour.

21:45- Worsley Avenue- landfill gas odour. Noticeable for approximately 5 minutes before disappearing.

21:54- Brynhyfryd- no odours. breeze blowing.

21:58- Worsley Avenue- No odours. Windy.

22:04- Heol Orsaf- strong, localised drain/ sewer odour.

22:17- Bangor Road- no odours.

22:45- Stablegates- no odours.

22:50- Bangor Road- slight landfill gas odour observed approximately half way along Bangor Road, driving towards the landfill.

22:55- Bangor Road, past railway bridge, driving towards site- no odours.

22:57- New Hall Road- no odours.

Following investigation into the odour incidents, the operator confirmed that one of the two landfill gas engines on site (engine 3) had to be restarted on the evening of the 11/08/24 as it tripped due to a fault with the water cooling system. This engine tripped at 18:10 and was operational again by 18:23. During this time, the other landfill gas engine and the landfill gas flare were operational and utilizing landfill gas.

Action 1- Provide NRW with gas flow data for both landfill gas engines and the flare for the period 01/08/24- 20/08/24.

### **Inspection findings**

Before carrying out the site inspection, NRW officers completed offsite olfactory monitoring and made the following observations:

New Hall Road- landfill gas odour detected when turning onto New Hall Road and present for approximately half the length of the road.

Shellbrook Drive- no odours.

Vauxhall Industrial Estate- heated plastic odour near New Horizons Plastics. Cooking oil/ fat odour near Fry Fresh.

Heol Kenyon- no odours.

Heol Offa- no odours. Noted that construction works were being carried out on the sewage/ drainage network. NRW officers were informed by staff working here that the works commenced on 25/07/24.

Ruabon Road- no odours.

Upper Bangor Road- no odours

Tany Y Clwadd- no odours

Worsley Avenue- no odours.

Gwalia- no odours

Brynhyfryd- no odours.

Maes Isaf- no odours

Bangor Road- no odours.

The Regional Manager and Site Manager were both present on site and accompanied NRW officers during the inspection. The weather was sunny, hot and clear with a temperature of 27 °C. There was a slight breeze with the wind blowing towards the east, north east.

In the gas compound, the operator confirmed that the issue with the water cooler which caused gas engine 3 to trip the previous evening had been resolved. Both engines were operational.

The turbos were replaced on gas engine 3 on 10/06/24 and the waste gate was changed 18/06/24. This engine is scheduled to be sent offsite in early September for a rebuild. The operator is currently trying to source another engine to be brought to site temporarily while this work is completed.

Slight odours of combustion (burning) and landfill gas were observed when standing next to the gas engine cooling vents. These odours were not observed when stood away from the engines.

NRW officers walked along the boundary fence which runs parallel to New Hall Road and across the top of Cell 5a. No odours were detected.

7500 m2 of permanent clay capping has recently been completed on the top of Cell 4 and Cell 5a. Restoration soils are now being placed in these areas, prior to grass seeding.

Temporary capping consisting of Linear Low-Density Polyethylene (LLDPE) plastic liner covers the northern face of Cell 5a. There were no odours observed while standing near this area.

Waste tipping operations were being carried out in Cell 5b. The tipping area was relatively small, minimising the amount of exposed waste. While stood on top of the western flank of Cell 5a, officers observed slight, transient landfill gas and waste odours.

The operator provided an overview of recently completed and scheduled works:

- Gas collector lines have been connected from leachate chambers and gas wells in Cell 5b into the gas main for active extraction, across this cell.
- A series of perforated horizontal gas collection lines have been installed within the current tipping area of Cell 5b, to provide gas extraction and minimise any odour,

prior to more permanent deep gas wells being installed.

- Planned works to be completed over the next few weeks include moving the 180mm gas main and collector lines onto top of Cell 5a and installing temporary capping with LLDPE plastic liner on the northern flank of Cell 5b.

There were a number of seagulls present on site. The operator has procedures in place to manage these, including the use of a contractor with a bird of prey.

There were no flies or signs of infestation observed onsite.

While stood on the western bund of the site perimeter, officers noticed a mix of odours drifting over from the Vauxhall Industrial Estate. These included resin, fats and plastic.

Officers detected leachate odours when approaching the leachate storage tank. There was a small hatch held open by metal guide rails. The operator said these guide rails had been in place since 2017 as they were considering the option of treating the leachate on site.

Currently, there are no plans to treat the leachate so the operator agreed to remove the rails, allowing the hatch to be closed. As the rails & hatch were elevated, the operator stated that they would need to engage the services of a lifting contractor. A deadline of 31/09/24 was agreed.

Following the site inspection, the operator informed NRW that they had managed to remove the guide rails on the leachate storage tank using plant and machinery currently on site. This work was completed on 13/08/24 and photographs were provided. NRW considers that this action has been completed.

Action 2: The operator needs to review the site's leachate collection infrastructure to assess the potential pathways for odour and the need for any additional odour abatement e.g. carbon filters. Provide a written update to NRW following completion of this work.

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 only relating to the activity assessment
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 – Emissions to water, air or 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.

### **What do I do if I disagree with the report or have a complaint?**

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk) for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at [ask@ombudsman.wales](mailto: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.