

Compliance Assessment Report CAR_NRW0048216

Permit being assessed: GP3030BE.

For: Shotton Works Landfill Site No 1 , **held by:** Tata Steel UK Limited

At: Shotton Works Weighbridge Road , Deeside Industrial Park, Clwyd, CH5 2NH.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 29/04/2025 - 12/05/2025.

Parts of permit assessed: See below.

NRW Lead Officer: Victoria Taylor.

Report sent to: Senior QSHE Officer, Senior QSHE Officer, on 12/05/2025.

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	C3 Minor	Condition 1.1.1
IR2I - Installations - Operations - Leachate levels (only applicable to landfill)	C3 Minor	Condition 4.2.3 (a)
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	Condition 4.2.3(a)
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	Condition 4.2.3(a)
IR4A - Installations - Information - Records	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
4	16

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
IR1A	See Action 2 below	30/06/2025

Criteria	Action needed	Complete by
IR2I	See Action 1 below	30/05/2025
IR3A(1)	See Action 3 below	30/05/2025
IR3A(2)	See Action 4 below	30/05/2025

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Q1 2025 (January – March) monitoring results were submitted to NRW on 29 April 2025 in accordance with Condition 4.2.3.

Q1 Monitoring Returns

S3.1 Leachate Levels (Condition 3.1.2) (permitted limit 1m above base of cell).

The Operator has only provided data for monitoring wells L9 and “well”. The reported leachate levels are below the permitted limit.

Table S3.1 of the permit requires that all boreholes and wells in operational cells are monitored for leachate levels. The permit defines operational cells or phases as “*those that do not have a final engineer cap agreed in accordance with the landfill engineering condition 2.4.*” The absence of leachate level data is a **breach of condition 4.2.3 (a) and has been scored C3** (see Action 1 below).

The absence and omission of monitoring data as required of the permit reflects a failure of the management system. This is a **breach of Condition 1.1.1 and has been scored C3** (see Action 2 below). Further breaches of Condition 1.1.1 have been consolidated (see below).

S3.2 Groundwater Monitoring Data.

The current permit has set limits for Ammoniacal Nitrogen (NH₃) 224mg/l, Zinc (Zn) 3.42mg/l and Nickel (Ni) 1.75mg/l. The limits are set for BH1, BH2, BH11, BH12 and BH13. There are no recorded breaches.

Quarterly groundwater samples from BH1, BH2, BH8—BH15 are also to be analysed for an

additional suite of parameters. The Operator has failed to provide analysis results for the following parameters:

- Arsenic
- Phosphate
- Selenium

This is a **breach of condition 4.2.3 (a) and has been scored C3** (see Action 3 below).

The absence and omission of monitoring data as required of the permit reflects a failure of the management system. This is a **breach of Condition 1.1.1**.

S3.3 Landfill Gas - External Monitoring Wells.

The permit has set a permitted limit of 1% v/v for Methane (CH₄) in BH1, BH2, BH8-BH10. There are no recorded breaches.

Note: *The landfill gas reporting form, submitted by the operator for the monitoring period 01/01/2025 to 31/03/2025, states a compliance limit of 1.5% v/v for carbon dioxide. Table S3.3 of the permit does not specify a limit for carbon dioxide; the reference to the 1.5% compliance limit should be removed from future submissions.*

S3.4 Landfill Gas – In-Waste Monitoring Wells

In-waste monitoring of parameters for monitoring wells C0, C1 and C2 have been undertaken in accordance with the permit.

The Operator has failed to provide in-waste monitoring data for monitoring boreholes BH12, BH12, BH13 and BH14. This is a **breach of condition 4.2.3 (a) and has been scored C3** (see Action 4 below).

The absence and omission of monitoring data as required of the permit reflects a failure of the management system. This is a **breach of Condition 1.1.1**.

S3.5 Landfill Gas Emissions – Capped Surfaces

Required annually.

S3.6 Leachate

Required six-monthly.

Waste Received Q1.

Waste Received into landfill was 28.32 tonnes of Inert Construction Waste. No waste removed.

Actions

Action 1. Review the status of the monitoring wells and boreholes within operational cells, measure the leachate levels and provide the leachate level data on the required form to NRW by **30 May 2025**.

Action 2. Procedures and work instructions associated with monitoring, sampling and

analysis for the landfill should be reviewed and updated to ensure the EMS reflects the requirements of the permit. The action is to be completed by **30 June 2025** to ensure Q2 compliance with the permit.

Action 3. Undertake groundwater analysis for Arsenic, Phosphate and Selenium, as outlined in Table S3.2 of the permit. Provide the results on the required form to NRW by **30 May 2025**.

Action 4. Undertake in-waste gas monitoring for all specified boreholes, as outlined in Table S3.4 of the permit. Provide the results on the required form to NRW by **30 May 2025**.

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 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

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.