

Compliance Assessment Report CAR_NRW0048946

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: 14/04/2025 between 12:00 and 15:00.

Parts of permit assessed: Site inspection .

NRW Lead Officer: Jamie Blythin, accompanied by Kathryn Bradshaw.

Report sent to: Regional Manager, Regional Manager , on 06/08/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2K - Installations - Operations - Landfill gas management (only applicable to landfill)	Action only (X)	
IR2H - Installations - Operations - Waste acceptance (only applicable to landfill)	C3 Minor	2.6
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
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
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
IR2K	Action 1: Operator to review emissions survey sheet and carry out a fugitive emissions FID walkover survey across the site which encompasses areas where elevated emissions were recorded by NRW. The operator needs to include the site surface of Cell 5a directly above the pipe which connects to the ring main where elevated emissions were recorded by NRW. On completion of this, the operator needs to submit a report of the findings to NRW by the specified date. The report should include details of any remedial measures that have been completed / are due to be completed to reduce fugitive emissions as far as reasonably practicable.	16/09/2025
IR2H	Action 2: Provide NRW with evidence (duty of care documentation) for the waste wood removed from site following this inspection.	02/09/2025
IR1A	Action 3: Operator to update the site's waste acceptance procedure with measures to prevent waste wood and separately collected waste streams being accepted at the site in the future. Provide NRW with a copy of the updated waste acceptance procedure by the specified date.	16/09/2025

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

This Compliance Assessment Report (CAR) follows a routine site inspection at Hafod Landfill.

Immediately before carrying out the inspection, officers completed offsite odour monitoring at the following locations:

New Hall Road- faint landfill gas odour (2/6)
 Shellbrook Drive- no odours
 Vauxhall Industrial Estate- no odours
 Ruabon Road- faint silage odour (2/6)
 Heol Kenyon- no odours
 Bangor Road- no odours

Nant Parc Estate- no odours
Bangor Road- no odours

At the time of the inspection, weather conditions were sunny with a moderate breeze.

NRW officers used a calibrated Gazomat Inspectra TDL unit to detect methane emissions during the inspection. A background reading of 2.7 ppm methane was detected at the site office car park. A separate methane emissions survey sheet was completed during the inspection and should be read in conjunction with this CAR.

The Site Manager accompanied officers during the inspection.

This inspection was conducted following the completion of a number of actions in the operator's Landfill Gas Management Action Plan (dated 24.01.25):

1- Installation of new horizontal gas wells in cell 5b. 14 pin wells installed along 2 benches located on the northern flank of Cell 4- **complete**

3- 7 new vertical gas wells installed in Cell 5b and connected to gas extraction system- **complete**

9- Temporary capping -Linear Low-Density Polyethylene (LLDPE) has been installed on the northern slopes of Cell 4 covering an area of approximately 6000m²-**complete**

Inspection findings

Variable emissions were recorded during the inspection (see emissions survey sheet) with evidence of pulsing in some areas.

Eastern site boundary/ Cell 5a

Officers surveyed the western site boundary and edge of temporary capping on top of Cell 5a.

Emissions between 3-280ppm were recorded across the top of cell 5a and along the edge of temporary capping.

Elevated emissions were recorded on the site surface of Cell 5a directly above the pipe which connects to the ring main. Emissions up to 20,000ppm were recorded. There was pulsing evident with results spiking before returning to lower values. There were no landfill gas odours observed in this area. These elevated emissions were discussed with the Site Manager who was asked to investigate.

Emissions between 40-60ppm were recorded on the surface of the western flank of Cell 5a.

Cell 5b

Officers surveyed the area of Cell 5c where 7 new vertical gas wells have recently been

installed. Emissions ranging between 9-40 ppm were recorded in this area.

Cell 3

Officers surveyed the area around where the temporary capping has recently been installed. Emissions ranging between 2.7-400ppm were recorded.

Cell 4

Officers surveyed the areas around where the temporary capping and pin wells have recently been installed. Emissions ranging between 2.6-40ppm were recorded.

Action 1: Operator to review emissions survey sheet and carry out a fugitive emissions FID walkover survey across the site which encompasses areas where elevated emissions were recorded by NRW. The operator needs to include the site surface of Cell 5a directly above the pipe which connects to the ring main where elevated emissions were recorded by NRW. On completion of this, the operator needs to submit a report of the findings to NRW by the specified date. The report should include details of any remedial measures that have been completed / are due to be completed to reduce fugitive emissions as far as reasonably practicable.

Waste acceptance

During the inspection, officers observed a pile of waste wood stored adjacent to the active tipping cell. As of 06/04/24, there has been a ban on the acceptance of all waste wood and separately collected waste streams at landfills in Wales. This was discussed with the Site Manager and Regional Manager during the inspection. The operator was told to remove the waste wood from site to an authorised facility and update the site's waste acceptance procedures to reflect current regulations.

NRW considers the acceptance of the wood waste to be a breach of permit condition 2.6.1 and a non-compliance score has been applied (IR2H Waste acceptance-C3).

Action 2: Provide NRW with evidence (duty of care documentation) for the waste wood removed from site following this inspection.

NRW considers the root cause of the permit breach above to be due to the site's waste acceptance procedure that was in place at the time of the inspection. NRW considers this a breach of permit condition 1.1.1 and a non-compliance score has been applied (IR1A-General Management-C3).

Action 3: Operator to update the site's waste acceptance procedure with measures to prevent waste wood and separately collected waste streams being accepted at the site in the future. Provide NRW with a copy of the updated waste acceptance procedure by the specified date.

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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.