

Compliance Assessment Report CAR_NRW0049468

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: Site Inspection,

Reason: Routine.

On: 24/09/2025 between 10:00 and 14:30.

Parts of permit assessed: Waste Acceptance.

NRW Lead Officer: Kathryn Bradshaw, accompanied by Victoria Taylor.

Report sent to: Senior Energy and Environment Officer, Senior Energy and Environment Officer, on 07/10/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2H - Installations - Operations - Waste acceptance (only applicable to landfill)	C3 Minor	2.5
IR2H - Installations - Operations - Waste acceptance (only applicable to landfill)	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	
IR1A - Installations - Management - General Management	C3 Minor	1.1

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
IR2H	Provide training/awareness to Facilities staff on the requirements of permit condition 2.5 and technical guidance WM3 and review waste acceptance procedures to ensure they reflect current operations.	30/01/2026
IR2H	Provide any laboratory testing of mirror entry wastes that have been conducted over the last 5 years	31/10/2025
IR1A	Provide NRW with the certificates for the TCM once they have been appointed.	07/11/2025
IR1A	Provide an up to date plan of capping to date which includes the current extent of capping	31/03/2026
IR1A	Provide a tipping/operational plan which includes proposals for capping	31/03/2026
IR1A	Review roles and responsibilities, resources and procedures for the management of the landfill and implement any improvements that are identified during the review	30/01/2026

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.

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

This Compliance Assessment Report (CAR) has been raised following a pre-arranged site inspection and audit of waste acceptance for the landfill permit.

A review of waste returns submitted for the last 3 years was conducted prior to arrival on site. The site had reported only small amounts of EWC 17 05 04 (soil & stones) described as inert construction waste had been deposited in the landfill during this time, approximately 5 to 30 tonnes per quarter.

During the site visit and audit several members of staff were present including the Senior Energy and Environment Officer, Principle Consultant Land, Planning and Waste, Facilities team member and representatives from the laboratory.

Technical Competence

Permit condition 1.1.4 states the following;

The operator shall comply with the requirements of an approved competence scheme.

The technically competent manager (TCM) that has been covering the site for the last few years does not possess the module for Level 4 High Risk Operator Competence for Managing Open Non-Hazardous Landfill. TCM services are being provided by a contractor, however, the site does not currently have any TCM cover as the individual provided by the contractor is no longer available. The site have requested cover from the contractor but no details have been provided as yet. The site has considered bringing this in house but due to the very low levels of activity at the landfill they would find it very difficult to cover all the learning required.

Action

Provide NRW with the certificates for the TCM once they have been appointed.

Roles and Responsibilities

The facilities department run the day to day management of the landfill. The on-site laboratory arrange for technicians to collect data for leachate monitoring and a contractor is used for gas monitoring. The Environmental department collates and reports the data required by the permit including waste returns to NRW.

Waste Acceptance

During the audit it was explained by Facilities that only road sweepings were currently being deposited in the landfill. This has been the case over the last few years due to improved waste segregation and recycling. After further discussions it appeared some rubble and soil had also been deposited in the landfill by the onsite civil engineering contractor. It was not clear during the audit where these wastes originated.

Weighbridge tickets were viewed for the most recent deposits of waste and included the following descriptions;

- Rubble
- Road sweepings

Wastes destined for disposal at the landfill are generally stored in skips on site and when full moved to the landfill site for disposal. The waste is weighed at a weighbridge remote from the landfill. Access to the landfill is controlled through a permit to work system. A completed permit to work was viewed that was dated 16/09/25 for footpath work on the landfill.

The EWC code for road sweepings is 20 03 03 (street-cleaning residues) which is an absolute non-hazardous code. There are a number of EWC codes which may apply to the rubble being deposited. The code for soil and stones (17 05 04) is a mirror non-hazardous code which is being used in the waste returns. These wastes need to be characterised and assessed according to Guidance on the classification and assessment of waste (Technical Guidance WM3). This is to ensure accurate records are kept of the quantity, characteristics

and origins of any waste that has been/is being deposited in the landfill as per Permit Condition 2.5.

The site believed that previous testing had been conducted on some of the waste loads that have a mirror entry. The records could not be located during the audit.

Action

Provide any laboratory testing of mirror entry wastes that have been conducted over the last 5 years

It was not clear during the audit if the different types of waste (road sweepings, rubble, soil and stones) were being mixed in the skips prior to disposal or kept as separate waste streams. This needs to be clarified in your procedures to ensure accurate waste descriptions and records are kept.

A copy of the waste disposal procedure (no document reference) and standard operating procedures were supplied after the site visit. These were reviewed and none of these make it clear what wastes can be deposited at the landfill and what is removed from site for disposal elsewhere. There is no mention of how to describe and classify waste which should be done for all wastes generated on site including those being moved internally for disposal at the landfill.

General awareness of waste description and classification was poor and it was not clear who was responsible for managing this aspect of the permit.

A score against these permit conditions has been applied;

IR2H Waste Acceptance C3

Action

Provide training/awareness to Facilities staff on the requirements of permit condition 2.5 and technical guidance WM3 and review waste acceptance procedures to ensure they reflect current operations.

Inspection of the landfill

The landfill site is secure with lockable gates at the entrance and access is controlled by the permit to work system. There is a small gatehouse and any staff or contractors who enter the landfill have to complete a visitor logbook which was viewed at the time of the visit. Contractors were working on site during the time of the visit to de-silt some of the boreholes. We viewed the active tipping area in Cell 2 which was very small and it appeared to have recently been scraped back with piles of what appeared to be road sweepings, soil, stones and rubble, see photo below;



It was explained that they do have small stockpiles of cover material but due to very low use, some of these had been covered by vegetation.

Cell 1 is not being used but has not been capped. Historical waste was visible in this area as can be seen in the photo below;



Cell 3 / 4 is not currently being used and it was suggested on site that the clay liner used in this cell may be used in future for capping, if the material is deemed suitable.

The following actions were raised during a previous audit of the site (CAR_NRW0044645);

- The operator should ensure that waste is capped as soon as practicable to minimise leachate generation and associated environmental impacts. An up to date plan of capping to date which includes the current extent of capping should be provided to NRW by 31 December 2024.
- A tipping /operational plan, which includes proposal for capping in accordance with the requirements of the permit is to be provided to NRW by 31 December 2024.

To date these plans have not been provided and both actions are being reiterated on this CAR with an extended deadline of 31st March 2026.

During this inspection it was not clear which areas were operational and which areas could not be tipped on. A clear plan needs to be provided for all site staff to work to and what

areas of the site require permanent capping if no longer in use.

Due to the lack of TCM cover, limited knowledge within operations of the importance of correct waste classification and no capping and operational plans the root cause appears to be an ad hoc and piecemeal approach to the management of the landfill and a score has been applied against permit condition 1.1. General Management.

IR1A General Management C3

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.