

Compliance Assessment Report CAR_NRW0050206

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: Incident Response (Incident number 2511374).

On: 18/12/2025 between 11:15 and 15:10.

Parts of permit assessed: See below.

NRW Lead Officer: Jamie Blythin, accompanied by Victoria Taylor.

Report sent to: Regional Manager, Regional Manager, on 24/12/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR3C - Installations - Emissions and monitoring - Odour	Action only (X)	
IR3F - Installations - Emissions and monitoring - Pests	Assessed (A)	
IR1A - Installations - Management - General Management	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
IR3C	Action 1. Operator to assess the integrity of the leachate/ condensate collection tank and ancillary equipment and assess the feasibility of the implementation of additional measures to reduce the potential for odours from this tank.	30/01/2026

Criteria	Action needed	Complete by
	Provide a written update to NRW by the specified date.	
IR1A	Action 2: Operator to provide NRW with updated Leachate Management Action Plan (LMAP) and Landfill Gas Management Action Plan (LGMAP) by the specified date.	16/01/2026

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.

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 routine site inspection at Hafod Landfill and summarises the findings of offsite odour monitoring.

Off-site Odour Monitoring

The weather conditions preceding the site inspection included very heavy rain; at the time of the inspection the weather was wet, with light to moderate rain showers, and cold (approx. 9 degrees Celsius), with a slight north-easterly breeze.

NRW officers completed offsite odour monitoring immediately before and after the site inspection, at the following locations:

- New Hall Road- no odours
- Shellbrook Drive Ruabon- no odours
- Bedwell Drive – no odours
- East Avenue – no odours
- B5605 – no odours
- Vauxhall Industrial Estate- burning odour (3/6) and undefined chemical odour (3/6)
- Ruabon Road near Co-op - no odours
- Heol Hafod, Heol Kenyon, Heol Offa & Heol Orsaf - no odours
- Y Gesail - no odours
- Tan y Clawdd, Y Fron, Gwalia, Worsley Avenue and Melyd Avenue – no odours
- Linley Avenue – no odours
- Top (west) Bangor Road- very slight waste odour (1/6)
- Bangor Road at Hafod Landfill entrance- waste odour (3/6)
- A483 – no odour

It should be noted that several WIRS reporting strong odours from multiple locations around Johnstown and the surrounding areas were received by NRW during the periods of offsite odour monitoring and during the time officers were on site. During the offsite odour monitoring, NRW officers observed that windows on many properties were open, including those properties facing the general direction of the landfill.

Site Inspection

During the site inspection, NRW Officers met the Regional Manager and Site Manager. The Site Manager accompanied NRW officers during the inspection.

The access road was clean at the time of arrival, covered waste vehicles were on the site road waiting to be received at the weighbridge and vehicles were using the wheel-wash facility before leaving site.

Both gas engines were running at the time of the inspection and the flare was off. Slight landfill gas odours (2/6) and oily/burning odours (2/6) were detected adjacent to the landfill gas engine cooling vents. These odours were localised and not detected outside of the engine compound.

A distinct leachate odour (3/6) was detected in the immediate vicinity of the leachate/ condensate collection tank located in the SE area of the site, approximately 10m from the site boundary with New Hall Road. These odours were not detected outside of the site boundary.

This tank is fitted with an activated carbon filter and this was last changed on 03/12/25.

There were no obvious issues or leaks observed during a visual inspection, however, the operator agreed to carry out further investigations to reduce the potential for odours.

Action 1: Operator to assess the integrity of the leachate/ condensate collection tank and ancillary equipment and assess the feasibility of the implementation of additional measures to reduce the potential for odours from this tank. Provide a written update to NRW by the specified date. **Due 30/01/26.**

Waste tipping operations were being carried out on top of the landfill. Waste odours were observed (3/6) while stood next to the active tipping area.

A leachate tanker arrived on site and pumped leachate from the main leachate storage tank whilst NRW Officers were present on site. Short-lived, localised, leachate odours were observed (3/6) while this activity was completed.

The operator gave an overview of the proposed site development and works planned for 2026, including the installation of additional landfill gas infrastructure, capping and re-drilling of some leachate wells. The operator confirmed that they would provide NRW with an updated Leachate Management Action Plan (LMAP) and Landfill Gas Management Action Plan (LGMAP) in January 2026.

Action 2: Operator to provide NRW with updated Leachate Management Action Plan (LMAP) and Landfill Gas Management Action Plan (LGMAP) by the specified date. **Due 16/01/26.**

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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.