Compliance Assessment Report CAR_NRW0048680

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: Report/Data Review,

Reason: Routine.

On: 30/06/2025.

Parts of permit assessed: Review of Q1 (January-March) 2025 monitoring data.

NRW Lead Officer: Jamie Blythin.

Report sent to: Regional Manager, Regional Manager, on 06/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.5.1(a)
IR2I - Installations - Operations - Leachate levels (only applicable to landfill)	C2 Significant	2.7.1
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.5.1 (d)
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.5
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1

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

Total non-compliances recorded	Total non-compliance score
6	51

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
IR3E	Action 1: Operator to complete all monitoring as specified in the permit. Action 3: Operator to complete all monitoring as specified in the permit.	31/08/2025
IR2I	Action 2: Operator to provide NRW with an updated Leachate Management Action Plan (LMAP) with reasonable timescales that includes updates on the ongoing actions referenced above and also includes actions to: 1) Provide NRW with evidence to confirm the presence of perched leachate and any other issues which may be contributing to over-estimation of leachate levels at the site. 2) Complete works to resolve any issues that may be contributing to over-estimation of leachate levels at the site e.g. perched leachate, to ensure all monitoring results are representative of actual leachate levels within the monitoring wells. 3) Investigate any monitoring wells with leachate levels above the permitted 2m compliance limit and complete works to ensure compliance with the permitted limit.	16/09/2025
IR3A(2)	Action 4: Provide NRW with an updated Landfill Gas Management Action Plan that includes updates on the actions listed above.	16/09/2025
IR3A(1)	Action 5: Submit a proposal in writing ,with supporting evidence, to NRW to raise ELV of chloride for monitoring point BHHA12C(B)	24/10/2025
IR3A(1)	Action 6: Operator to continue to review monitoring results. If elevated Ammonical Nitrogen is detected in subsequent sampling results, carry out investigation and report outcome to NRW.	31/08/2025
IR1A	Action 7: Update the site's Leachate Management Plan to reflect current site operations.	24/10/2025

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 review of the Q1 (January-March) 2025 monitoring data which was submitted to NRW on 28/04/25 in accordance with permit condition 4.2.3.

Leachate

The permit requires the operator to complete leachate monitoring as specified in tables S3.1 and S3.9.

January

In January, leachate level data was only obtained for monitoring point LMPb1. No data was provided for the other permitted monitoring points:

HAF LMP2AR

HAF LMP3

HAF LC4

HAF LMP4a

HAF LMP4b

HAF LC5

HAF LMP5a

HAF LMP5b

HAF LC5b

HAF LMP5C

The operator did not notify NRW or provide an explanation as to why the monitoring had not been completed for all monitoring points in January.

February

In February, leachate level data was obtained for all monitoring points.

March

In March, leachate level data was obtained for all monitoring points.

It should be noted that leachate level monitoring was completed twice in March. However, the permit requires that monthly monitoring is completed for all monitoring points. NRW considers the failure to complete monthly monitoring at all leachate monitoring points to be a breach of permit condition 3.5.1(a) and a non-compliance score has been applied (IR3E-Monitoring-C3).

Action 1: Operator to complete all monitoring as specified in the permit.

During Q1,leachate heads between 0.55m and 23.77 m were recorded against a compliance limit of 2m.

With reference to schedule 5 notifications HAF 385,HAF389 and HAF392, there were 20 instances where the recorded leachate level was greater than the permitted compliance limit of 2m. NRW considers this a breach of permit condition 2.7.1 and a non-compliance score has been applied (IR21-Leachate levels-C2).

Due to the ongoing nature of this permit breach, the non-compliance score has been

escalated to a C2-Significant.

With reference to schedule 5 notifications HAF 385, 389 and 392, the operator states the following reasons for the high leachate levels during Q1 (2025):

January

'A manual dip was taken from MP1b on the 24.01.25 (29.69m to leachate) the Venturi pump needs to be removed to enable the dip to be taken. We have had issues with this pump and will look to trial the new eductor pump in this well at some stage in the future.

The pump in MP2AR has been keeping the leachate level between the setpoints of 1m and 5m above the base of the pump. This gives an actual leachate level between 8.5m and 12.5m from the base. When we have lowered the pump further down within the chamber, we find that the pump quickly blocks. The design of this re-drill had slotted sections at various levels from the base up to near the top and as a result, is allowing perched leachate to enter the well at various levels.

We were able to obtain manual dips for LC3 and the level was below the compliance limit of 2m.

We know from the recent CCTV survey that LC4 has liquid coming in at various levels and this confirms that perched leachate is entering the well and adding to the liquid level being detected. The pump was removed in early December to raise the well. We had to wait to allow the waste to be raised around it to reconnect it back onto the system, and since this has now been done the levels are decreasing steadily.

The manual dips in LMP4a and LMP4b are thought to be due to perched layers of leachate entering the wells from higher up. A pump was installed in LMP4b, and this is now connected into the leachate collection system.

The pump in Cell 5a failed at the beginning of January, causing the levels to quickly rise in that cell. The pump has now been replaced, and the levels are back below the compliance limit of 2m.

The manual dips obtained for LC5b and LMP5c are showing levels below the compliance limit of 2m.'

February

'A manual dip was taken from MP1b on the 19.02.25 (29.14m to leachate) the Venturi pump needs to be removed to enable the dip to be taken. We have had issues with this

pump and will look to move the new eductor pump into this well at some stage in the future.

The pump in MP2AR has been keeping the leachate level between the setpoints of 1m and 5m above the base of the pump. This gives an actual leachate level between 8.5m and 12.5m from the base. When we have lowered the pump further down within the chamber, we find that the pump quickly blocks. The design of this re-drill had slotted sections at various levels from the base up to near the top and as a result, is allowing perched leachate to enter the well at various levels.

We were able to obtain a manual dip for LC3 and the level was 8.55m. Our electrical contractors have been out to this pump and replaced a damaged cable, the level will start to come back down over the next couple of weeks.

We know from the CCTV survey that LC4 has liquid coming in at various levels and this confirms that perched leachate is entering the well and adding to the liquid level being detected. The pump was removed in early December to raise the well. We had to wait to allow the waste to be raised around it to reconnect it back onto the system, and since this has now been done the levels are decreasing steadily.

The manual dips in LMP4a and LMP4b are thought to be due to perched layers of leachate entering the wells from higher up. The pump and pipe work has been removed from LMP4b to allow for tipping and raising of the chamber.

The manual dips obtained for LC5, LC5b and MP5a are showing levels below the compliance limit of 2m. Unfortunately, we were unable to obtain dips from LMP5b (dip tape hung up on obstruction) and LMP5c (chamber too high). We will reattempt these very soon.'

March

A manual dip was taken from MP1b on the 28.03.25 (29.05m to leachate) the Venturi pump needs to be removed to enable the dip to be taken. We have had issues with this pump and will look to move the new eductor pump into this well at some stage in the future.

The pump in MP2AR failed in March, we had our electrical contractor out and they diagnosed the fault to be in the cables from the power supply box to the well, they have ordered the parts and will be out to fit them in the next few days. When we have lowered the pump further down within the chamber, we find that the pump quickly blocks. The design of this re-drill had slotted sections at various levels from the base up to near the top and as a result, is allowing perched leachate to enter the well at various levels.

We were unable to obtain a manual dip for LC3. The pump has been operating consistently between the set points of 1 and 2m. With the offset the transducer reading on 28.03.25 was 1.81m-3.01m

We know from the CCTV survey that LC4 has liquid coming in at various levels and this confirms that perched leachate is entering the well and adding to the liquid level being detected.

The levels detected in LMP4a are thought to be due to perched layers of leachate entering the well from higher up.

The manual dips obtained for LC5, LC5b, LMP5a and LMP5b are showing levels below the compliance limit of 2m. Unfortunately, we were unable to obtain dips from LMP4b and LMP5c (chamber too high).'

The reasons for the breaches in permitted leachate levels stated in the schedule 5 notifications above are very similar if not exactly the same as those given for breaches of permitted leachate levels throughout 2024.

With reference to the 2024 Annual Environmental Monitoring Review, the operator provides an overview of issues affecting leachate levels at the site and states the following:

'Leachate level monitoring has historically been difficult at Hafod landfill site because of the high levels of foaming within the monitoring wells. Investigations into the leachate level measurements, including the use of transducers, have previously demonstrated that the leachate heads acting on the base of the Site are likely to be lower than that reported through manual dipping. Contributions from perched leachate as explained within the April 2015 leachate management plan also exacerbate the over-estimation of leachate heads. Discrepancies between manual dips and the actual leachate height are still apparent as is demonstrated by comparisons of transducer measurements and manual dip data set out within Schedule 5 notices.

Leachate well LMP1B had an eductor pump installed in December 2022. This pump has been pumping steadily and removing significant volumes of leachate from the well. However, due to the pipework (input and discharge pipes) in the well it has not been possible to regularly dip the well unless the pipework is removed. Eight manual dips were obtained, between 19.5 m and 27 m. Leachate from Cell 1 continues to be pumped from the base of Cell 1 via the operational sidewall riser at a rate of ~2 - 3 m3 per day.

A replacement well (LMP2AR) was installed within Cell 2 during February 2020 to replace the original chamber. The replacement well was constructed with slotted pipe to the full depth of the well to encourage the flow of perched leachate into the leachate chamber. The manual dip data collected in 2024 is more representative of leachate levels than that determined in previous years when the readings were affected by suspected foaming. A shrouded-probe dip meter is now used to monitor this well, and throughout the year levels between 0.4 m and 2.6 m have been recorded. The only months notably above the 2 m

permit limit were October (2.58 m) and December (2.61 m). Leachate continues to be abstracted from this monitoring point to assist in the dewatering of the cell.

It was not possible to obtain a manual dip at LC3 within Cell 3 on several occasions during 2024 due to an obstruction which the dip-meter is getting caught on. There is a known 'ledge' in this well and this has been explored using CCTV footage. Due to tipping operations around LC3 in December 2024, the amount of time that the pump could be run was limited when the cables and pipe work were moved to allow safe tipping. This resulted in a higher reading for December than earlier in the year, when the head was typically 4.1 – 7.6 m from manual dips. Within Cell 3, leachate levels were sometimes elevated above the 2 m leachate head permit limit during 2024 according to manual dip and transducer readings. Within the Cell 5a, leachate levels were all below the 2 m permit limit.

Within Cell 4, manual dips record an elevated leachate head of up to 26.4 m, which are thought to be perched levels. Manual dips are believed to be affected by perched leachate entering the well at various levels, and also the effect of the dip meter and the pumping equipment. The pump ran throughout November, but in early December the pump had to be removed to raise the well and could not be reactivated until the waste around it had been raised to allow it to be reconnected to the system.

Although leachate levels are on occasions above the permit limit, the leachate is encapsulated within a low permeability geological barrier. There is no environmental risk from the leachate within the Site as the leachate remains hydraulically contained and hence of negligible pollution potential. A Permit Limit of 2 m above the base is effectively an operational limit to ensure there is no outbreak above a small terminal bund within the quarry, which will be entirely negated on the construction of each successive cell, as has happened for Cells 1, 2 and 3, and will shortly be completed for Cell 4 following the Cell 5c extension works.

The site's hydrogeological risk assessment review demonstrated that there was no risk to the groundwater from leachate, even if leachate levels were at the foam height recorded within the monitoring wells. Recommendations were made to increase the leachate level permit limit to 89.65 mAOD. However, it was recommended that for cells with a boundary facing into the undeveloped quarry, leachate levels were managed to below the terminal bund.

There is no evidence of leachate seepages into the undeveloped area of the Site. Therefore, in accordance with the site's HRA review a conclusion can still be drawn that the leachate body is unlikely to be having a significant impact on groundwater.'

The operator contends that long standing issues such as perched leachate are contributing to an over-estimation of leachate heads (e.g. at LC4) and monitoring results are not representative of actual heights within the cells. However, NRW has not been presented with comprehensive evidence to support this theory or an action plan specifying what works will be completed to ensure monitoring results are representative of the actual levels within

wells.

It should be noted that the operator last provided NRW with an updated Leachate Management Action Plan (LMAP) in November 2024 and has been working through the actions contained in the plan:

'

1. Complete outstanding permanent clay capping, circa 8,000m2. Temporary clay capping on Cell 4 and Cell 5a was replaced with permanent clay capping before the target date of the end of May 2024. **Complete**

2. Install further temporary LLDPE capping along northern flanks of Cell 5a and Cell 5b, as soon as available. Additional 2000m2 completed in June 2024, 3500m2 completed in Sept 2024 and 1500m2 completed in December 2024. **Complete.** * 6000m2 of temporary capping (LLDPE) installed on Cell 4 in March 2025.

3. Install fully automated pumping system in Cell 5b, operated via Ebox and transducers. NB: Transducers show continuous level readings. New leachate main pipework installed. Pump panel and pumps installed in February 2024. Further pump added to Cell 4 leachate drain on 8th November 2024. Concrete ring pump will be desilted by vacuum tanker. **Complete.**

4. Undertake CCTV camera survey on all existing leachate infrastructure, to determine if working as required and if monthly leachate dips are providing an accurate representation of actual leachate levels within the site. Several CCTV surveys were completed in 2024 and 2025. **Ongoing-Waiting for operator to finalise results and provide summary report to NRW.**

5. Monitor liquid levels in gas wells to determine if this is having any effect on gas collection efficiencies. **Ongoing-awaiting update from operator.**

6. Review leachate pumping system in LMP1R to determine if the eductor pump is working effectively. **Ongoing-awaiting update from operator.**

7. Review Leachate Management Plan and submit to NRW, outlining progress made towards 2m compliance levels. This report will include a Water Balance Report. Ongoing.

Initial target date of 31/04/25. **Ongoing-awaiting update from operator.**

8. Following HRA review, propose new leachate compliance levels together with justification to increase levels from 2m head to (6m) head in Cells 1 to 4.Initial target completion date 31/06/25. A new Water Balance Report will be produced by environmental consultants during the first quarter of 2025, this will then feed into a new LMP for the site. **Ongoing -awaiting update from operator.**

9. Investigate if a carbon filter pack can be installed at the Leachate Storage Tank to reduce any odours from exhaust gas from vacuum tankers. Trial conducted at another Enovert site. **Ongoing-awaiting update from operator.**

Action 2: Operator to provide NRW with an updated Leachate Management Action Plan (LMAP) with reasonable timescales that includes updates on the ongoing actions referenced above and also includes actions to:

1) Provide NRW with evidence to confirm the presence of perched leachate and any other issues which may be contributing to over-estimation of leachate levels at the site.

2) Complete works to resolve any issues that may be contributing to over-estimation of leachate levels at the site e.g. perched leachate, to ensure all monitoring results are representative of actual leachate levels within the monitoring wells.

3) Investigate any monitoring wells with leachate levels above the permitted 2m compliance limit and complete works to ensure compliance with the permitted limit.

Quarterly monitoring for the leachate parameters specified in table S3.9 was completed for cell 3 (HAF LMP3) and cell 5b (HAF LC5b). However, representative samples from cells 4 (HAF LC4) and 5 (HAF LC5) were not taken. The operator states that this was because the sampling points in these wells (LC4 &L5) need to have a new sample valve fitted and this is scheduled during Q2.

NRW considers the failure to complete quarterly leachate sampling as specified in table S3.9 to be a breach of permit condition 3.5.1(a) and a non-compliance score has been

applied (IR3E-Monitoring-C3). This score has been consolidated with the other breach of condition 3.5.1 (a) referenced earlier in the report.

Action 3: Operator to complete all monitoring as specified in the permit.

During Q1 a total of 6,783 m3 of leachate was removed from site for treatment.

Landfill gas

Perimeter gas monitoring was undertaken in accordance with Condition 3.5.1(d) and Table 3.6 (Landfill gas in external boreholes).

With reference to Schedule 5 notifications HAF 384 (January), HAF388 (February) and HAF 391 (March), there were 21 instances during Q1 where methane (CH4) levels in perimeter gas wells exceeded the 1% permitted Emission Limit Value (ELV). Values between 0.2-24.3 % methane were recorded during Q1. NRW considers this a breach of permit condition 3.1.7 and a non-compliance score has been applied (IR3A-Emissions to water, air or land-C3)

The operator states the following in Schedule 5 notifications in relation to breaches of the 1% methane ELV for perimeter wells:

'A review of the historic methane data for the boreholes that breached the compliance limit this month, reveal that these boreholes have frequently demonstrated elevated methane concentrations which have been well documented.

Breaches where the methane to carbon dioxide ratio is much greater than or much less than 1.5 is very unlikely to be landfill gas. Much of the gas seen is believed to be mines gas.

This is discussed at length in the most recent annual report. It is stated that "Methane from the underlying coal measures was identified at the site during early preoperational investigations."

The extra monitoring gas wells GBA to GBJ are not listed in the permit and thus do not

have limits set and therefore are not included in the schedule 5.'

Breaches of the ELV for perimeter gas wells and investigations into this are discussed in the 2024 Annual Monitoring report (2024). With reference to the operator's most recent Landfill Gas Management Action Plan (dated 24/01/25), they intend to complete the following actions in relation to the breaches of ELVs in perimeter gas wells:

5. Review previous reports and data in relation to historic perimeter gas exceedances along the southern perimeter gas monitoring boreholes.Env Compliance Team have completed reviewed of previous MWH report along with recent perimeter gas data. Once a full 12 months of data is obtained and reviewed, we will move on to Action 8 and with the sufficient data set apply for a permit variation to raise the ELV for methane at the perimeter wells. **Complete**

6. Review and monitor gas pressure in southern perimeter gas boreholes. Review current gas data and produce series of graphs. Assess for any patterns (atmospheric or gas field related) and set up alerts so these can be linked. Assess if nitrogen purging would assist understanding. **Ongoing throughout 2025.**

7. Assess gas well performance in Cell 1 adjacent to affected southern perimeter gas monitoring borehole.Liquid level monitoring in gas wells currently being undertaken and plans produced to determine depth influence from each wells to compare against perimeter borehole logs. **Ongoing. NRW awaiting update.**

8. Review permit limits of perimeter gas monitoring boreholes (inc gas flow), and prepare possible permit variation. Target date will be affected by completion of other action points. **Ongoing.**

Action 4: Provide NRW with an updated Landfill Gas Management Action Plan that includes updates on the actions listed above.

Groundwater

Groundwater monitoring was undertaken in accordance with Condition 3.5.1(c) and Tables S3.5 (Groundwater-emission limits and monitoring requirements) and S3.11 (Groundwater - other monitoring requirements).

Samples were not taken at the following monitoring points as the operator states there was insufficient liquid to sample: BH HA 1A(T), BH HA 9A(T), BH HA 11B(T) and BH HA 12A(T).

Samples were not taken at the following monitoring points as they were inaccessible due to a fallen tree: BH HA 5(B) and BH HA 5(T).

With reference to schedule 5 notification HAF390, monitoring point BH HA 12C(B) recorded a chloride value of 330mg/l vs a compliance limit of 200mg/l on 18/03/25. NRW considers this as a breach of permit condition 3.1.5 and a non-compliance score has been applied (IR3A-Emissions to water, air or land-C3).

It should be noted that the operator was scored in 2024 for elevated chloride in monitoring point BH HA12C(B). The operator completed an investigation into the elevated chloride levels in this monitoring point and plan to submit a proposal, with supporting evidence, to raise the ELV. See CAR_NRW0046256.

Action 5: Submit a proposal in writing ,with supporting evidence, to NRW to raise ELV of chloride for monitoring point BHHA12C(B)

All other results for the sampled permitted monitoring points were in compliance with the permitted ELVs.

The operator is required to carry out monthly monitoring of groundwater levels (dip to water -m- and water level mAOD). Monitoring was completed for all monitoring points except BH HA 11A(B) due to an obstruction at 7.25m and the following monitoring points due to access issues with the fallen tree: BH HA 5(B), BH HA 5(T),BH HA 12A(M), BH HA 12A(T) and BH HA 12C(B).

Surface water

Surface water monitoring was completed in accordance with Condition 3.5.1(b) and (e), Tables S3.3 (point source emissions to water-emission limits and monitoring requirements) and S3.10 (surface water-other monitoring requirements).

With reference to schedule 5 notifications HAF 386, HAF387 and HAF390, the following ELV breaches were recorded at monitoring point SW1A:

Ammoniacal Nitrogen

13/01/25- 6.8mg/l vs permitted ELV of 1.8mg/l

06/02/25- 10 mg/l vs permitted ELV of 1.8mg/l

18/03/25- 2.1mg/l vs permitted ELV of 1.8mg/l

NRW considers this a breach of permit condition 3.1.1 and a non-compliance score has been applied (IR3A-Emissions to water, air or land-C3).

The operator provided the following information in schedule 5 notification HAF390 in relation to the Ammoniacal Nitrogen breaches:

'Ammoniacal-N (in SW1A) is following a similar pattern to previous years and is likely linked with anoxic waters created by decomposing leaf fall which is discussed at length in the 2024 annual report. Therefore, it is very unlikely to be due to any leachate contamination and is more likely to be representative of background conditions.

The result at SW1, upstream and flowing towards the site, has also in recent months been showing elevated ammoniacal-nitrogen, which cannot possibly be related to the landfill site and must be from another source. The likelihood is that both sample locations have been affected by the same natural background processes, such as rotting vegetation in the wet weather. The SW1 result has decreased in March to background concentrations, and SW1a is showing a decrease as well.

Future monitoring results will be reviewed to see if the elevated concentrations continue.

Our independent consultants have examined both the above sets of results as part of the recent annual environmental monitoring review. Permit limits will be reviewed.

If leachate contamination was the cause, then we would be seeing a wide range of parameters being elevated, which is not the case.'

Action 6: Operator to continue to review monitoring results. If elevated Ammoniacal Nitrogen is detected in subsequent sampling results, carry out investigation and report outcome to NRW.

On 18/03/25, monitoring point SW1A recorded a suspended solids result of 54mg/l vs a permitted ELV of 50mg/l. However, when measurement uncertainty of 10% is applied, this gives a value of 48.6mg/l, which is within the permitted ELV.

General Management

With reference to the breaches of permitted leachate levels discussed earlier in the report, the Leachate Management Plan (LMP) (V2.1) which forms part of the site's Environmental Management System has not been up updated since 2015 and does not fully reflect current site operations. NRW consider this a breach of condition 1.1.1 and a non-compliance score has been applied (IR1A-General Management-C3).

Action 7: Update the site's Leachate Management Plan to reflect current site operations.

It should be noted that the operator is in the process on updating the site's LMP and this was due to be sent to NRW by 31/04/25- See Action 7 in operators Leachate Management Action Plan (November 2024) referenced earlier in this report.

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.