

Compliance Assessment Report CAR_NRW0050511

Permit being assessed: JB3597TN.

For: Tir John Landfill (Closed Site), **held by:** City and County of Swansea

At: Tir John Landfill, Fabian Way, Port Tennant, Swansea, SA1 8QP.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: 2025 Q4 monitoring return.

NRW Lead Officer: Daniel Packer.

Report sent to: Lance Jones, Area Operations Manager , on 23/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W3E - Waste - Emissions and monitoring - Monitoring	C3 Minor	3.5
W3A(3) - Waste - Emissions and monitoring - Emissions to land	C3 Minor	2.7.1
W3E - Waste - Emissions and monitoring - Monitoring	C3 Minor	3.5.1.(a)
W3E - Waste - Emissions and monitoring - Monitoring	C3 Minor	3.5.1.(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
W3E	Submit application to vary the permitted compliance limit requirement with supporting documentation for the removal of TIRGP004 from the monitoring requirements. Please note the following caveat: there must be a commitment to revisit the	28/02/2026

Criteria	Action needed	Complete by
	monitoring arrangements for TIRGP004 should conditions change — for example, in the event of evidence of gas migration or the introduction of new land uses in the vicinity.	
W3A(3)	Operator shall reduce leachate levels so as to achieve compliance with the limits specified in the EPR permit.	28/02/2026
W3E	Operator shall take measures to ensure that monitoring is undertaken and accurately reported at the locations and frequency specified in the EPR permit.	28/02/2026
W3E	Submit application to vary the permit with supporting documentation.	28/02/2026

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) is an assessment of the monitoring submission covering the Quarter 4 (Q4) (October to December 2025) period required by the permit of the operator, Enovert Limited - Tir John Landfill.

The Q4 monitoring submission was received within the reporting deadline specified by this EPR permit. This represents compliance with the environmental permit under permit condition 4.2.

Ground Water

From a review of the information submitted, ground water monitoring was undertaken, and the reported results were compliant with the stipulated emission limit required by permit condition 3 Emissions and monitoring.

Emissions to Air

From a review of the information submitted, perimeter gas monitoring was undertaken, and the reported results were compliant with the stipulated emission limit required by permit condition 3 Emissions and monitoring.

Results for TIRGP004 were missing with Field Technicians Comments “No access” as shown below:

Sample Point	Date	Filed Technicians Comments
TIRGP004	22/10/2025	No access
TIRGP004	20/11/2025	No access
TIRGP004	10/12/2025	No access

A non-compliance score of C3 has been allocated in relation to these permit breaches (covering the Q4 monitoring period), against permit condition 3.5 – Monitoring, under compliance criteria W3E (Monitoring).

ACTION (1) – Submit application to vary the permitted compliance limit requirement with supporting documentation for the removal of TIRGP004 from the monitoring requirements. Please note the following caveat: there must be a commitment to revisit the monitoring arrangements for TIRGP004 should conditions change — for example, in the event of evidence of gas migration or the introduction of new land uses in the vicinity.

Leachate

Leachate level

From a review of the information submitted, the leachate level results for the following monitoring points, over the Q4 monitoring period, exceeded the EPR permits compliance limits.

Sample Point	Date	Leachate Head (m)	Limit (m)
TIR HWM09A	04/11/2025	2.04	1
	20/11/2025	3.65	
	10/12/2025	3.82	
TIR HWM11	04/11/2025	8.37	1
	20/11/2025	1.16	
	10/12/2025	4.20	
TIR HWM12	04/11/2025	1.66	1
	20/11/2025	2.79	
	10/12/2025	4.18	

The elevated leachate levels reported above were non-compliant with the stipulated emission limit required by permit condition 2.7.1 Leachate levels.

A non-compliance score of C3 score has been allocated to this permit breach (covering the Q4 monitoring period) under compliance criteria (W3A(3)) Emissions to land.

ACTION (2) – Operator shall reduce leachate levels so as to achieve compliance with the limits specified in the EPR permit.

Leachate level – monitoring failures

From a review of the information submitted, the below leachate monitoring wells cannot be monitored to the frequency specified in the permit over the Q4 monitoring period.

HWM07 reporting data is being reported as “Dry, hits sludge” on 04/11/2025, 20/11/2025 and 10/12/2025, however the schedule 5 notification TIR0306 8/12/25 submitted on 17/12/2025 reports the following conflicting information :

Sample Point	Date	Leachate Head (m)
TIR HWM07	20/11/2025	1.90

The above noted failure to monitor leachate levels at the locations and frequencies specified in the permit represents a non-compliance with the environmental permit under permit condition 3.5.1.(a)

A non-compliance score of C3 score has been allocated to these permit breaches (covering the Q4 monitoring period) under compliance criteria (W3E) Monitoring.

ACTION (3) – Operator shall take measures to ensure that monitoring is undertaken and accurately reported at the locations and frequency specified in the EPR permit.

TIR HWM05 reporting data missing. Whilst it is acknowledged, that this well has been redrilled under TIR HWM05A, until such time as an application is made to vary the permit and the variation is determined/approved the current limits apply. Note there is no guarantee that an application to vary the permit will result it in being granted.

A non-compliance score of C3 has been applied to this permit breach (covering the Q4 monitoring period) quarter against permit conditions 3.5.1.(a) under compliance criteria (W3E) Monitoring.

ACTION (4) - Submit application to vary the permit with supporting documentation.

Summary of Actions

ACTION (1) – Submit application to vary the permitted compliance limit requirement with supporting documentation for the removal of TIRGP004 from the monitoring requirements. Please note the following caveat: there must be a commitment to revisit the monitoring arrangements for TIRGP004 should conditions change — for example, in the event of evidence of gas migration or the introduction of new land uses in the vicinity.

ACTION (2) – Operator shall reduce leachate levels so as to achieve compliance with the limits specified in the EPR permit.

ACTION (3) – Operator shall take measures to ensure that monitoring is undertaken and accurately reported at the locations and frequency specified in the EPR permit.

ACTION (4) - Submit application to vary the permit with supporting documentation.

End.

Note: This CAR report and assessment was undertaken on 28/01/2025. However to ensure that the CCS score is attributed to the correct financial year (for billing) the date on CARS system has been altered to 31 December 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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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 Waste compliance criteria (used in section 1 and 2):**1. Management**

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.