

## Compliance Assessment Report CAR\_NRW0050853

**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:** Report/Data Review,

**Reason:** Routine.

**On:** 31/12/2025.

**Parts of permit assessed:** See below.

**NRW Lead Officer:** Victoria Taylor.

**Report sent to:** Environment Officer, Environment Officer, on 27/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2I - Installations - Operations - Leachate levels (only applicable to landfill)	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	Condition 3.5.1 S3.3 & S3.4
IR4B - Installations - Information - Reporting	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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	See Action 1 below	Already completed

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 generated by the Natural Resources Wales (NRW) regulating officer to comment upon the 2025 Q4 Monitoring Returns and Annual Report.

#### **Q4 Monitoring Returns**

Q4 2025 (October - December) monitoring results were submitted to NRW on 10/02/2026. Prior agreement from NRW was sought by the Operator for the late submission of the returns and therefore no score has been applied.

#### **S3.1 Leachate Levels (permitted limit, 1m above base of cell)**

Leachate levels are required for all boreholes and wells within operational cells. The Operator has provided data for monitoring wells L4 to L6 and "well". All boreholes were either reported as dry or leachate levels were less than the permitted limit.

#### **S3.2 Groundwater Monitoring Data (3 point moving average)**

The current permit has set limits for Ammoniacal Nitrogen (NH<sub>3</sub>), Zinc (Zn) and Nickel (Ni) on boreholes 1,2,9 and 10 only. All parameters were below the ELVs required by the permit.

Quarterly groundwater samples from BH1, BH2, BH8—BH15 were analysed for the additional suite of quarterly parameters as stated in the permit (Table S3.2). Concentration limits for parameters in samples recovered from these monitoring points are not set in the permit. As per 2025 Q2 and Q3 returns the analysis continues to report some concentrations higher than would be expected in such samples.

Annual analysis of groundwater for List 1 Hazardous Substances was also undertaken as in S3.2 of the permit. The majority of the parameters were reported to be less than the laboratory limit of detection (<LOD).

#### **S3.3 External Gas Monitoring Wells.**

External gas monitoring is required on a quarterly basis within each calendar year. Q4 external gas monitoring was undertaken on the 19 January 2026. **This is a breach of the requirements set out in Schedule 3, Table 3.3 and has been scored C3, see Action 1 below.**

The current permit has set permitted limits, Methane (CH<sub>4</sub>) 1% v/v for BH1, 2, 8, 9 and 10. Recorded concentrations do not exceed permitted limits.

Monitoring of Carbon Dioxide (CO<sub>2</sub>), Oxygen (O<sub>2</sub>), Hydrogen Sulphide (H<sub>2</sub>S) and Carbon Monoxide (CO) in BH1, 2, 8, 9 and 10 is also a permit requirement. Limits are not set for these parameters, and the operator is currently monitoring and recording trends for all external gas monitoring well parameters.

### **S3.4 Landfill Gas In-waste Monitoring.**

In-well gas monitoring is required on a quarterly basis within each calendar year. Q4 external gas monitoring was undertaken on the 19 January 2026. **This is a breach Condition 3.5.1 and the requirements set out in Schedule 3, Table 3.4. A score for late monitoring has already been applied under S3.3 above.**

In-waste monitoring of parameters for monitoring wells BH11 to BH14, C0, C1 and C2 have been undertaken in accordance with the permit.

Limits are not set for these parameters, and the operator is currently monitoring and recording trends for in-waste gas monitoring well parameters.

### **S3.5 Landfill Gas – Average Methane Flux**

Monitoring requirements for the permanently capped cell (Cell 0) were reported by the Operator in accordance with the permit. An average methane flux of 0.00049 mg/m<sup>2</sup> /second was recorded. This is below the 0.001mg/m<sup>2</sup> /second limit specified in the permit.

### **S3.6 Leachate – Other Monitoring Requirements**

Six-monthly leachate analysis has been provided in accordance with the permit for Cell 1 and Cell 2. Annual analysis of leachate for List 1 Hazardous Substances was also undertaken as required in S3.6 of the permit. The majority of the parameters were reported to be <LOD.

### **Waste Received**

The Operator confirmed that 54.64 tonnes of waste was received at the landfill . No waste was removed. The Operator provided email confirmation on 12 February 2026, that all landfill operations have been suspended until further notice; the last waste deposit at the landfill was on the 24 September 2025.

### **Annual Report.**

The Annual Report was submitted to NRW via email on 29/01/26 as required by Permit Condition 4.2.2.

The Annual Report comments on relevant areas of landfill operations as per the sub-criteria of Permit Condition 4.2.2 including production/treatment (S4.2) and performance parameters (S4.3).

The estimated total void space is approximately 65,454m<sup>3</sup>, this is greater void space than reported for 2024. The Operator provided the following reason for this as follows:

*Changes in volumes on the landfill site are so small at the moment and the amount of soil heaps located on the area affect the figures. Also any slight changes in the way we interpreted the top & bottoms of the banks or where we take the point on the ground makes a difference to the volumes. A level change of +/- 10mm in the affected area can change the volume by about 200m<sup>3</sup>*

Based on current deposition rates the remaining life of the landfill is estimated to be in excess of 99years, assuming no changes to current site operations.

### **Actions and Recommendations**

**Action 1.** The Operator shall undertake sampling, analysis and reporting of the parameters within the timescales specified in the permit. The next quarterly returns (Q1) report is to be provided to NRW no later than **28 April 2026**.

**Recommendation 1.** NRW recommend as per previous CARS for 2025 that the Operator should continue to satisfy themselves that they are not unintentionally influencing the results presented during the sampling and analysis of groundwater and leachate, by potentially cross contaminating samples. The Operator should consult appropriate sampling guidance and adopt best practice on site. The Operator should also continue to collate and review the data with a view to undertaking further investigation in the future should it be requested by NRW.

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 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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

### 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](mailto: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](mailto: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.