

Compliance Assessment Report CAR_NRW0052190

Permit being assessed: VP3935AT.

For: Tir John Landfill, **held by:** Enovert South Ltd

At: Wern Fawr Road, Off Fabian Way, Port Tenant, SWANSEA, West Glamorgan, SA1 8LN.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 25/06/2026.

Parts of permit assessed: 2026 Q1.

NRW Lead Officer: Daniel Packer.

Report sent to: Area Operations Manager, Area Operations Manager, on 25/06/2026.

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)	C2 Significant (Suspended)	2.8.1
IR3E - Installations - Emissions and monitoring - Monitoring	C2 Significant (Suspended)	3.5.1.(a)
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.5.1. (a)
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2 & 3.1.5
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2 & 3.1.5
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
5	12

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
IR2I	Operator to reduce leachate levels as to achieve compliance with the limits specified in the EPR permit.	31/07/2026
IR3E	Operator is to ensure that monitoring is undertaken at the locations and frequency specified in the EPR permit.	31/07/2026
IR3E	Submit application to vary the permitted compliance limit for Ammoniacal-N (the application will need to include the requisite supporting information).	31/07/2026
IR3A(1)	Submit application to vary the permitted compliance limit for ortho-phosphate (the application will need to include the requisite supporting information).	31/07/2026
IR3A(1)	Investigate the cause of the elevated Ammoniacal-N level and implement any actions required to return to permitted limits.	31/07/2026
IR3A(1)	Submit application to vary the permitted compliance limit along with supporting technical evidence to demonstrate that no other laboratory in the UK are able to analyse samples to the required limit of detection.	31/07/2026

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.

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) is an assessment of the monitoring submission covering the Quarter 1 (Q1) (January to March 2026) period.

Note – A revised Leachate Action Plan was submitted to NRW on 08/05/2026; however, this document has yet to be reviewed or assessed against the information provided within the 2026 Q1 monitoring data submission.

2026 Q1 monitoring submission

The Q1 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.

Leachate Level

Leachate Level exceedances

Based on the information submitted, the leachate levels results for the following monitoring points, over the Q1 monitoring period, exceeded the EPR permit's compliance limits:

Monitoring Point	Date of detection of breach	Reported Leachate Level (Limit 1m)	Duration of non compliance (period examined Q4 2020 to Q1 2026*)
LEW 07	28/01/2026	5.34	Submitted leachate level data indicates leachate levels have mostly been non-compliant since at least Q4 2021
	25/02/2026	5.80	
	18/03/2026	4.13	
LEW 08	28/01/2026	3.67	
LEW 14a	28/01/2026	6.72	Submitted leachate level data indicates leachate levels have mostly been non-compliant since at least Q4 2024
	25/02/2026	6.35	
	19/03/2026	6.23	
LEW 15a	28/01/2026	13.57	Submitted leachate level data indicates leachate levels have mostly been non-compliant since at least Q1 2024
	25/02/2026	13.59	
	19/03/2026	13.45	
LEW 20	28/01/2026	3.59	Submitted leachate level data indicates leachate levels have mostly been non-compliant since at least Q3 2022
	25/02/2026	3.04	
	18/03/2026	2.72	
LEW 21	28/01/2026	4.52	Submitted leachate level data indicates leachate levels have been non-compliant since at least Q4 2020
	25/02/2026	1.67	
	18/03/2026	1.65	
LEW 23	28/01/2026	3.70	Submitted leachate level data indicates leachate levels have been non-compliant since Q4 2020
	25/02/2026	3.72	
	18/03/2026	3.74	
LEW 24	28/01/2026	3.57	Submitted leachate level data indicates leachate levels have been non-compliant since at least Q4 2020
	25/02/2026	3.63	
	18/03/2026	4.57	
LEW 25	28/01/2026	1.49	Submitted leachate level data indicates leachate levels have been non-compliant since at least Q1 2023
	25/02/2026	6.96	
	18/03/2026	6.54	
LEW 26	28/01/2026	1.77	Submitted leachate level data indicates leachate levels have mostly been non-compliant since at least Q4 2020
	25/02/2026	1.75	
	18/03/2026	1.67	
LEW 28	28/01/2026	2.02	Submitted leachate level data indicates leachate levels have mostly been non-compliant since at least Q4 2020
	25/02/2026	2.00	
	19/03/2026	2.00	
LEW 29	28/01/2026	8.09	Submitted leachate level

			<i>data indicates leachate levels have mostly been non-compliant since at least Q4 2020</i>
	25/02/2026	7.99	
	19/03/2026	7.49	
LEW 31	19/03/2026	1.39	
LEW 32	28/01/2026	3.05	<i>Submitted leachate level data indicates leachate levels have mostly been non-compliant since at least Q4 2020</i>
	25/02/2026	3.10	
	19/03/2026	3.11	
LEW 33	28/01/2026	8.74	Submitted leachate level data indicates leachate levels have mostly been compliant since at least Q4 2020
	25/02/2026	10.09	
	19/03/2026	7.72	
LEW 34	28/01/2026	4.46	Dec 2025
	25/02/2026	4.45	
	19/03/2026	4.41	

**Note: based on leachate level results data received since October 2020, (further non-compliances pre-date this period but have not been included as part of this report).*

Compliance:

The elevated leachate levels reported for all the 17 monitoring points listed above are contraventions of permit condition 2.8.1.

Note: 16 of 34 total wells (47%) across the site were non-compliant with the leachate level limit over Q1.

Non-compliance scores of C2 have been allocated to these permit breaches (covering the Q1 monitoring period (IR2I)).

Note: Non-compliance scores for the breaches of the leachate level compliance limit (over the Q1 monitoring period) have been consolidated into a single non-compliance score of C2.

Following the submission of a Leachate Action Plan which sets out a series of actions that the operator will undertake to reduce leachate levels within the site, we have determined, on this occasion, to suspend the non-compliance scores attributed to the leachate level exceedances reported for the Q1 period. This suspension of the Q1 non-compliance scores (for the leachate level exceedances) is subject to the following caveat: the Leachate Action Plan is implemented to the deadlines specified. If the actions specified in the Leachate Action Plan are not completed within the specified timeframes the non-compliance scores will be reinstated.

ACTION (1) – Operator to reduce leachate levels as to achieve compliance with the limits specified in the EPR permit.

Leachate Level – monitoring failures

Based on the information submitted a large number of the site monitoring wells cannot be monitored (dipped) to the frequency specified in the permit and this is contrary to the monitoring requirements set in the permit.

Note: 4 of 34 total wells (12%) across the site were non-complaint for monitoring failures over Q1.

During the Q1 2026 monitoring period, the operator was unable to monitor the following leachate monitoring wells:

Monitoring Point	Date of failure/s	Reported Reason for failure	Duration of non-compliance. (period examined Q4 2020 to Q1 2026**)
LEW 5A	January, February, March	Tape slack at 8.4m	Note – 2020 Q4 reported dip to leachate 11.66m, suggesting there is a blockage currently as there is a 3m difference.
LEW 9A	January, February, March	Well blockage	Feb 2024 Although results preceding the above date indicate elevated leachate level well above compliance limit.
LEW 9B	January, February, March	Well blockage	At least 2022 Although regular monitoring issues preceding this date. Where levels have been reported they have been above the leachate level compliance limit.
LEW 16	January, February, March	Well blockage	Oct 2024 Although results preceding the above date indicate elevated leachate level well above compliance limit and suspected blockages back in September 2023.

****Note: based on leachate level results data received since Oct 2020, (further non-compliances may pre-date this period but have not been included as part of this report).**

The above noted failures to monitor leachate levels at the locations and frequencies specified in the permit is contrary to condition 3.5.1. (a).

Given the extensive number of failures and the long term nature of these ongoing failures, a non-compliance scores of C2 have been allocated to these permit breaches (covering the Q1 monitoring period (IR3E)).

Note: Non-compliance scores for the breaches relating to the failure to monitor leachate levels (over the Q1 monitoring period) have been consolidated into a single non-compliance score of C2 (IR3E).

Following the submission of the Leachate Action Plan, we have determined to also suspend the non-compliance scores attributed to the failures in leachate monitoring, reported for the Q1 period. This suspension of the Q1 non-compliance scores (for the leachate monitoring failures) is also subject to the following caveat: the Leachate Action Plan is implemented to the deadlines specified. If the actions specified in the Leachate Action Plan are not completed within the specified timeframes the non-compliance scores will be reinstated.

ACTION (2) – Operator is to ensure that monitoring is undertaken at the locations and frequency specified in the EPR permit.

Ground Water

Based on the information submitted, the required ground water monitoring was undertaken.

Exceedances Ammoniacal-N

GDW05 shows elevated levels of Ammoniacal-N (mg/l) with a reported reading of 26 mg/l. This is above the permitted level of 25 mg/l. GDW18 has a reported reading of 12 mg/l. This is above the permitted level of 5 mg/l. This represents non-compliance with the compliance limit required under permit condition 3 - Emissions and monitoring.

Compliance:

The exceedance of the ammoniacal nitrogen compliance limit at the GDW05 and GDW18 monitoring points is contrary to permit conditions 3.1.2 & 3.1.5.

A non-compliance score of C3 has been allocated to this permit breach (covering the Q1 reporting period (IR3A)).

ACTION (3) – Submit application to vary the permitted compliance limit for Ammoniacal-N (the application will need to include the requisite supporting information).

Exceedances – Ortho Phosphate – multiple points

Ortho Phosphate levels were reported above the permitted limit of 0.05 mg/l across several wells. This represents a non-compliance with the stipulated compliance limit required under permit condition 3 - Emissions and monitoring.

Sample point	Date	Limit	Result
GDW04	18/03/2026	0.05	0.12 mg/l
GDW05	18/03/2026	0.05	0.25 mg/l
GDW07	18/03/2026	0.05	0.34 mg/l
GDW09	18/03/2026	0.05	0.62 mg/l
GDW12	18/03/2026	0.05	0.07 mg/l
GDW16	18/03/2026	0.05	0.31 mg/l

Compliance:

The exceedance of the ortho-phosphate compliance limit at the monitoring points listed above are contrary to conditions 3.1.2 & 3.1.5 of the permit.

Non-compliance scores of C3 have been assigned to these permit breaches (covering the Q1 monitoring period (IR3A)).

Note: Non-compliance scores for the breaches of the ortho-phosphate compliance limit (over the Q1 monitoring period) have been consolidated into one non-compliance score.

ACTION (4) – Submit application to vary the permitted compliance limit for ortho-phosphate (the application will need to include the requisite supporting information).

Surface water

Based on the information submitted, the surface water results for the following monitoring points, over the Q1 monitoring period, exceeded the EPR permit's compliance limits for:

Ammoniacal-N

Sample Point	Date	Limit	Result
SW1	28/01/2026	0.5(mg/l)	5.7 (mg/l)

Compliance:

The exceedance of the Ammoniacal-N compliance limit at the monitoring points listed above are contrary to conditions 3.1.2 of the permit.

Non-compliance scores of C3 have been assigned to these permit breaches (covering the Q1 monitoring period (IR3A)).

ACTION (5) – Investigate the cause of the elevated Ammoniacal-N level and implement any actions required to return to permitted limits.

Limits of detection

The Cis-1,2-Dichloroethene levels, is being reported as all showing <3 ug/l. However, the limit set within the permit is 1 ug/l. Until such time as an application is made to vary the permit the current limits apply.

The Tributyl Phosphate levels, is being reported as all showing <0.1 ug/l. However, the limit set within the permit is 0.02 ug/l. Until such time as an application is made to vary the permit the current limits apply.

The limit of detection for the Ortho Phosphate analysis is not low enough to achieve the limits specified in the permit. For example some of the Ortho Phosphate is being reported as showing <0.062 but the limit set within the permit is 0.05 (mg/l). Until such time as an application is made to vary the permit the current limits apply.

The Atrazine levels, is being reported as all showing <0.05 ug/l. However, the limit set within the permit is 0.03 ug/l. Until such time as an application is made to vary the permit the current limits apply.

The Dichlorprop levels, is being reported as all showing <0.02 ug/l. However, the limit set within the permit is 0.05 ug/l. Until such time as an application is made to vary the permit the current limits apply.

ACTION (6) - Submit application to vary the permitted compliance limit along with supporting technical evidence to demonstrate that no other laboratory in the UK are able to analyse samples to the required limit of detection.

Summary of Actions

ACTION (1) – Operator to reduce leachate levels as to achieve compliance with the limits specified in the EPR permit

ACTION (2) – Operator is to ensure that monitoring is undertaken at the locations and frequency specified in the EPR permit.

ACTION (3) – Submit application to vary the permitted compliance limit for Ammoniacal-N (the application will need to include the requisite supporting information to justify the proposed changes).

ACTION (4) – Submit application to vary the permitted compliance limit for ortho-phosphate (the application will need to include the requisite supporting information to justify the proposed changes).

ACTION (5) - Investigate the cause of the elevated Ammoniacal-N level and implement any actions required to return to permitted limits.

ACTION (6) - Submit application to vary the permitted compliance limit along with supporting technical evidence to demonstrate that no other laboratory in the UK are able to analyse samples to the required limit of detection.

End.

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

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.