

Compliance Assessment Report CAR_NRW0051733

Permit being assessed: GP3830BG.

For: Chirk Landfill Site EPR/GP3830BG, **held by:** FCC Waste Services (UK) Limited

At: Pen-y-Bont Works , Chirk, WREXHAM, Clwyd, LL14 5AR.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/03/2026.

Parts of permit assessed: Q1 Monitoring Returns.

NRW Lead Officer: Hannah Ibbotson.

Report sent to: Environmental Compliance Data Analyst, Environmental Compliance Data Analyst, on 30/06/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	C3 Minor (Suspended)	3.1.5, Schedule 3, Table S3.4
IR2I - Installations - Operations - Leachate levels (only applicable to landfill)	Assessed (A)	
IR2K - Installations - Operations - Landfill gas management (only applicable to landfill)	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
1	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
IR3A(3)	Awaiting permit variation determination	30/11/2026

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) has been raised by the Natural Resources Wales (NRW) regulating officer, to review the submitted Q1 Monitoring Returns (January – March 2026) & Permit Condition 4.2.2 Annual Monitoring Report (2025).

Annual Report

The Annual Report was submitted to NRW via email on 12/03/26 as agreed with NRW. This report addresses Permit Condition 4.2.2(a) and contained all expected information with no issues identified with the submitted data.

This submission contained the 2024 FID survey as required by Permit Condition 3.6 and the 2024 annual trace gas analysis as required by Permit Condition 3.7.

Q1 Monitoring Returns

Leachate Levels

Leachate levels as required by Schedule 3, Table S3.1 were provided for all sample points, and all were compliant for the period. It is noted that sample point LC05B recorded a reading of 43m, which is the limit.

Point Source Emissions to air (Flare/Gas Engine Emissions)

Monitoring to satisfy the requirements of Schedule 3, Table S3.2 has not been reported. This is normally presented in the Annual Monitoring Report at the close of the reporting year.

Surface Water

Monitoring of surface water was undertaken as required by Schedule 3, Tables S3.3 & S3.9. No breaches were reported in this quarter. No data was presented for discharge points WP4 & WP5 as no discharge has occurred at those locations.

Groundwater

Groundwater samples were taken throughout the monitoring period in accordance with Schedule 3, Tables S3.4 and S3.10. All reported parameters were within required ELVs (emission limit values).

Landfill Gas in External Monitoring Boreholes

Landfills gas in external monitoring boreholes was monitored as per the requirements of Schedule 3, Table S3.5.

Borehole T11 is a monitoring point with consistently high methane levels that are known not to be of landfill origin and does not carry permit limits. All other boreholes were compliant with the methane emission limit.

5 Boreholes were identified as exceeding the action limit for carbon dioxide (G8, G13, G15, G16, G17), these are not required to be reported to NRW.

Landfill Gas in Waste Monitoring Points

In waste gas monitoring was undertaken as required by Schedule 3, Table S3.7. In waste gas parameters were monitored as required Q1. In this quarter, 17 instances of readings of oxygen levels exceeding 5% and percentage gas balance being greater than 20% were recorded. Gas balance readings above 20% were not always associated with the locations where oxygen was exceeding 5%.

This was raised in the Q4 monitoring returns for 2025 with an action to report any investigations held into causation of air ingress, NRW received the following response from FCC:

“[Infinis] identified several issues across site with oxygen ingress and rectified by making small repairs/ remediations including pipe replacements, renewing monitoring points due to small leaks and replacing bentonite seals around the base of several wells.”

It has been agreed that records of any investigative work on air ingress shall be kept to conduct root cause analysis.

Notification of Groundwater Breach

NRW received a schedule notification on the 26th February 2026 reported a breach of groundwater zinc levels from 2 boreholes. BH9 and BH12 both carry permitted zinc limits of 0.020 mg/l but were measured at 0.037 mg/l and 0.059 mg/l respectively.

The site currently has a permit variation in with the permitting team in NRW to remove groundwater limits of Zinc **and** Manganese. This follows a HRA which shows results from an Environmental Setting and Installation Design Report (ESID) that describes baseline historical land use such as colliery spoil wastes and coal washing operations causing increases in the above substances.

A suspended score has been applied until the determination of the permit variation.

Suspended Score: IR3A - Emissions to water, air or land. Score **C3**. Permit Condition 3.1.5,

Schedule 3, Table S3.4

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.