

## Compliance Assessment Report CAR\_NRW0052297

**Permit being assessed:** FP3894FP.

**For:** Astbury (Rossett) Landfill, **held by:** W R G Environmental Ltd

**At:** Dark Lane, Burton, Rossett, Wrexham, LL12 0AE.

**Type of assessment:** Report/Data Review,

**Reason:** Routine.

**On:** 30/06/2026.

**Parts of permit assessed:** Monitoring.

**NRW Lead Officer:** Sarah Walton.

**Report sent to:** Chris Bennion, Site Business Manager, on 08/07/2026.

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

| Part of permitted activity assessed (compliance criteria)         | Assessment result | Permit condition |
|-------------------------------------------------------------------|-------------------|------------------|
| W3A(3) - Waste - Emissions and monitoring<br>- Emissions to land  | C3 Minor          | 2.8.1            |
| W3A(1) - Waste - Emissions and monitoring<br>- Emissions to water | Action only (X)   |                  |
| W2C - Waste - Operations - Operating techniques                   | C3 Minor          | 2.3.1            |

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

| Total non-compliances recorded | Total non-compliance score |
|--------------------------------|----------------------------|
| 2                              | 8                          |

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 |
|----------|-----------------------------------------------------------------------------------|-------------|
| W3A(3)   | Ensure all pumps and infrastructure on site is suitably serviced and maintained.  | 24/07/2026  |
| W3A(1)   | Please submit groundwater monitoring data for BH6A and CABH03 for quarter 1 2026. | 24/07/2026  |
| W2C      | Investigate elevated methane levels at the perimeter                              | 31/07/2026  |

| Criteria | Action needed                                                                    | Complete by |
|----------|----------------------------------------------------------------------------------|-------------|
|          | boreholes noted above and report back to NRW with findings and any action taken. |             |

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

A review of monitoring data for quarter 1 2026 has been completed.

**Permit condition 3.5.1 "The operator shall, unless otherwise agreed in writing by Natural Resources Wales, undertake the monitoring specified in the following tables in schedule 3 to this permit"**

#### **Leachate**

Leachate extraction points LC1Br, LC1Cr, LC3Br, LC1A, LC2A, LC2Br, LC2C, LC3A, LC3Cr, LC4A, LC4B, LC4C, LC5Ar, LC5Br, LC5CR, LC5DR, PH5B, PH5C, PH5D require quarterly monitoring.

The limits for leachate levels are specified as *"To be determined as a result of the findings of Improvement Conditions 4 and 5. In any case until such time as the findings of Improvement conditions 4 and 5 are available at least 1 metres freeboard shall be maintained between the internal bund separating the non-engineered parts of the Landfill"*.

Section 4.2.1 of the closure report notes leachate head limits as follows:

Astbury Landfill: 70.5mAOD;

Dark Lane Landfill: 1m above base.

It is noted in the closure plan that Dark Lane Landfill sits approximately 8m higher than Astbury. Schedule notifications from site show a compliance limit of 78.5mAOD.

A schedule notification was received by NRW on 29/03/2026, noting leachate breaches that occurred on 17/03/2026 which are as follows:

| Site    | Sample Point | Date       | Water Level (mAOD) | Limit (mAOD) |
|---------|--------------|------------|--------------------|--------------|
| Rossett | AS00LC1A     | 17/03/2026 | 72.98              | 70.5         |
| Rossett | AS00LC1Cr    | 17/03/2026 | 70.87              | 70.5         |
| Rossett | AS00PH5Dr    | 17/03/2026 | 79.41              | 78.5         |

**The breach in leachate levels has been assigned a CCS C3 score against permit condition 2.8.1.**

The operator attributed the exceedance of leachate levels to be as a result of pump breakdowns across cell 1.

**ACTIONS:**

- **Ensure that all infrastructure is suitably serviced and maintained.**
- **Please confirm whether any leachate head limits were determined as a result of improvement conditions 4 and 5.**

**Point source emissions to water & surface water**

No compliance issues were found relating to point source emissions to water or surface water.

**Groundwater**

The site's closure plan has the following compliance limits for groundwater monitoring points:

CABH4R: ammoniacal-nitrogen – 10mg/l; chloride 250mg/l ed

BH6A: ammoniacal-nitrogen – 3mg/l; chloride 250mg/l

Table S3.4 of the site permit also requires quarterly monitoring of CABH03 and CABH04R for ammoniacal nitrogen and chloride.

No groundwater results were submitted with the quarterly data. However, the annual report notes the following '*there is no data available for borehole CABH4R, for which compliance levels are set, as there is routinely insufficient liquid present to allow a sample to be collected*'.

No data for BH6A and CABH03 for quarter 1 2026 could be identified in the quarterly submission or the annual report.

**ACTION: Please submit groundwater monitoring data for BH6A and CABH03 for quarter 1 2026.**

**Landfill gas perimeter boreholes**

The following compliance limits were breached as stipulated in closure plan section 4.5 Landfill Gas Monitoring Assessment and Compliance limits.

**GB11:** 12/01/2026 recorded CH<sub>4</sub> 26.3(%v/v). Limit of 16.10(%v/v).

**GB12:** 16/02/2026 recorded CH<sub>4</sub> 25.2(%v/v). Limit of 4.70 (%v/v).

**GB21:** 16/02/2026 recorded CH<sub>4</sub> 69.4(%v/v). Limit of 67.5(%v/v).

**MBH05:** 12/01/2026 recorded CH<sub>4</sub> 2.9 (%v/v) and CO<sub>2</sub> 11.4 (%v/v). 16/02/2026 recorded CH<sub>4</sub> 7.2(%v/v) and CO<sub>2</sub> 12.9(%v/v). Limit of CH<sub>4</sub> 0.80(%v/v) and CO<sub>2</sub> 5.1(%v/v).

**NBH02:** 12/01/2026 recorded CH<sub>4</sub> 21.3(%v/v). Limit of 17.03(%v/v).

**The above breaches of landfill gas in perimeter boreholes has been recorded as a CCS C3 breach against permit condition 2.3.1(a).**

Permit condition 2.3.1(a) notes The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by Natural Resources Wales.

Table S1.2 lists Rossett/Astbury Site Closure Report May 2017 (updated August 2018) as one of the operating techniques.

**ACTION: Investigate elevated methane levels at the perimeter boreholes noted above and report back to NRW with findings and any action taken.**

\*End of comments\*

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](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.