

Compliance Assessment Report CAR_NRW0052456

Permit being assessed: PP3139GB.

For: Hafod Quarry Landfill Site, **held by:** Enovert North Limited

At: Hafod Quarry Landfill Bangor Road, Johnstown, Wrexham, LL14 6ET.

Type of assessment: Site Inspection,

Reason: Routine.

On: 20/07/2026 - 21/07/2026 between 11:00 and 16:40.

Parts of permit assessed: See below.

NRW Lead Officer: Victoria Taylor, accompanied by Jamie Blythin, Hannah Ibbotson.

Report sent to: Regional Manager, Regional Manager, on 05/08/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	Condition 3.2.1
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR4B - Installations - Information - Reporting	Action only (X)	

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
IR1A	See Action 4.	07/08/2026

Criteria	Action needed	Complete by
IR3A(1)	See Action 3	07/08/2026
IR3B	See Action 4	04/09/2026
IR3E	See Action 1 & 2 below	21/08/2026
IR4B	See Action 5	12/08/2026

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

A landfill site inspection was undertaken on the 20 and 21 July 2026 by Natural Resources Wales (NRW) NE Industry Regulation Team. NRW officers were accompanied on site by Enovert representatives, including the Site Manager and the Regional Manager (North).

Weather conditions were seasonally warm (approx. 23°C to 26°C), sunny with some high cloud and a moderate westerly to north westerly wind.

The access road was clean at the time of arrival and when leaving the site on both days. Covered waste vehicles were on the site road waiting to be received at the weighbridge.

CCTV Survey and Manual Dip Summary

The aim of the inspection was to view the status of leachate monitoring and pumping wells using both CCTV survey equipment and a manual dip meter. The Operator undertook all surveying and manual dipping of the wells, with NRW officers present for the duration of the works. The Operator is to review the CCTV footage and provide NRW with a report which details the findings, see **Action 1** and **Action 2**.

A summary of NRW observations during the CCTV survey and manual dipping is as follows:

Well ID	CCTV Leachate Level ^[1]	CCTV Well Base ^[1]	Leachate Manual Dip ^[1]	Well Base Manual Dip ^{[1][2]}
LMP1	42.89	53.0	38.8*	48.8*
MP2AR	53.0	54.0	48.0	>50.0

LC3	47.5	55.12	47.57	-
LC4	51.52	57.0	45.64	-
MP4A	20.53	32.18	18.3	22.0
MP4B	26.48	35.35	No manual dip taken	
LC5	34.4	37.46	30.51	-
LC5B	Not possible to remove well cap to allow CCTV survey.		5.58	6.62
MP5A	28.48	29.0	25.8	-
MP5B	27.8	28.0	24.51	25.98
MP5C	No CCTV survey possible		12.89	13.8

[1] All measurements are in meters (m) from top of well cap/ cover unless stated otherwise.

[2] Manual dip meter length limited is 50m. Anything beyond this is denoted by >50m

* Measurements taken from well once well cap removed due to limited well chamber access

Leachate Management

Leachate breakouts were observed from waste at varying heights on the eastern flank of Cell 4 and the exposed flanks of Cell 5b. Leachate breakout was also observed at the base of the southern flank of Cell 5b, where the LLDPE temporary capping was not tied into the waste.

Officers observed a pipe directly discharging liquid from a depression in the waste at the base of Cell 4 into Cell 5C.

The Operator ascertained the liquid was accumulated surface water, however given the antecedent weather conditions and the fact the liquid passes through the waste mass, NRW consider this leachate and it must be managed as such.

A previous site inspection (CAR reference NRW0051097) identified leachate pooling in a trench at the base of the western flank of Cell 5b and eastern flank of Cell 4. NRW officers observed that leachate was still pooling in this area, and the potential for the leachate to overtop remains a risk.

The previous site inspection CAR included an action (Action 8) to *Investigate the pooling of leachate at the trench on the western flank of Cell 5b and implement appropriate measures to ensure leachate is adequately controlled and minimises the potential for leachate breakouts*. The operator was required to provide a written update to NRW by 24/07/26, specifying what measures have been implemented to mitigate leachate breakout.

The Operator issued an email (dated 23 July 2026) to NRW which provides a response to CAR Action 8, as follows:

A new pump has been installed within the concrete chamber at the corner of the western flank of Cell 5b and the eastern end of Cell 4. This sump takes leachate from a French drain along the Cell 4 outer bund and also collects any perched levels in the northern flank above. As part of the works specified in Action point 2, which involves getting waste into this area of the site, we will continue the French drain all the way to this pumping sump and pick up any further leachate seepages from the corner of Cell 4. Due to the difficulties in accessing this area, these works can only be done once the waste platform allows safe access.

The Operator proposes to provide NRW with a more detailed engineering plan in relation to the works above, **see Action 3**.

The leachate breakouts detailed above would flow down slope and there is the potential risk of leachate flowing into Cell 5C, particularly during periods of rainfall. Waste deposition has not yet commenced in Cell 5C. Currently, any leachate which accumulates in the base of the Cell is being discharged via a dedicated pipe directly to the surface water management system. Given the potential for leachate to enter Cell 5C, all discharges from the Cell must be treated as leachate and managed in accordance with the leachate management plan **see Action 4**.

NRW considers the failure to fully address the leachate breakouts to be a breach of permit condition 3.2.1 (IR3B-Emissions of substances not controlled by emission limits) and a non-compliance score of C3 has been applied based on the potential environmental impacts.

NRW considers the root cause of the failure to address the potential for leachate to enter the surface water system is inadequate management and effective onsite controls. This is a breach of permit condition 1.1.1 (IR1A - General Management) and a non-compliance score of C3 has been applied based on the potential environmental impacts.

Other On-site Observations

During the site visit NRW also made the following observations:

- Waste tipping operations were being carried out on a section of the northern flank of Cell 4, continuing to build up waste levels to provide a drilling platform prior to the proposed re-drilling of leachate chamber LMP4a. Distinct (3/6) landfill gas and waste odours were observed near the active tipping area. The odours were intermittent and localised. They were not detected outside the boundary of the site.
- Cover material was observed being placed following the tipping of odorous waste in accordance with their odour management plan. Daily cover was observed being placed at the end of each working day.
- The wheel wash was operational and observed to be used by all vehicles leaving the site. This was reflected by the absence of mud on the site access road, site entrance and the public highway adjacent to the landfill.
- Bulk leachate tankers were observed arriving and leaving site on several occasions. No apparent odours were noted by NRW officers **see Action 5**.

Off-site odour monitoring

NRW officers completed offsite odour monitoring immediately after leaving the site on the 20 and 21 July. Offsite odour monitoring was undertaken at the following locations:

- Corner of New Hall Road/ Bangor Road- no odours
- New Hall Road - no odours
- Shellbrook Drive- no odours
- Bedwell Drive- no odours
- Blackbrook Drive - no odours.
- East Avenue- no odours

- Ruabon Road- no odours
- Vauxhall Industrial Estate - distinct peanut, possibly peanut oil odour (3/6). The odour detected could not be attributed to the landfill.
- Heol Hafod- no odours
- Heol Offa -no odours
- Heol Kenyon - no odours
- Y Gesail- no odours
- Heol Orsaf- no odours
- Heol Y Cyngor- no odours
- Snowdon Drive- no odours
- Worsely Avenue- no odours
- Gwalia- no odours
- Bryn Hyfryd- no odours
- Maes Isaf- no odours
- Y Fron- no odours
- Ffordd Pentre- no odours
- Rhoddfa Ganol- no odours
- Melyd Avenue- no odours
- Bryn Avenue- no odours
- Tan Y Clawdd- no odours
- Bangor Road (railway bridge)- no odours
- Bangor Road (site entrance)- no odours

At the time of the offsite odour monitoring, the weather conditions were sunny, temperature was 23 degrees centigrade and a blustery wind was blowing from the North-West and North.

Incidents

A single incident report (WIRS ref 2607966) was received by NRW during the period that officers were on site, which reported "*lots and lots of blue bottle flies*" [sic]. NRW officers did not observe any notable flies on or around the site during the site inspection period.

Actions

Action 1 - Provide NRW with a summary report of the findings of the CCTV survey and manual dipping no later than **21/08/26**.

Action 2 - Provide NRW with the downloaded CCTV footage for all wells no later than **21/08/26**. The CCTV footage must be provided in a readily accessible format to be agreed with NRW prior to issue.

Action 3 - Provide NRW with a detailed engineering plan demonstrating means of adequately managing leachate in Cell 4 and Cell 5b no later than **04/09/2026**. The plan should also include reasonable deadlines for the completion of these works.

Action 4 - **With immediate effect**, cease pumping of liquid from Cell 5C into the surface water system. All liquid which accumulates in Cell 5C shall be treated as leachate unless written confirmation to the contrary is provided by NRW. Provide written evidence to NRW that this has been completed by **07/08/2026**.

Action 5 - Provide NRW with Duty of Care Records for leachate removed from the site between 1st April 2026 and 31st August 2026 (inclusive) by **12/08/2026**. Thereafter, provide weekly Duty of Care Records for leachate removed from site, until further notice.

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.