

Compliance Assessment Report CAR_NRW0052492

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: Report/Data Review,

Reason: Routine.

On: 28/07/2026 - 05/08/2026.

Parts of permit assessed: See below.

NRW Lead Officer: Victoria Taylor.

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
IR2I - Installations - Operations - Leachate levels (only applicable to landfill)	C2 Significant	2.7.1
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.7
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.1
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.1
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.1
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
6	51

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 2 below	30/09/2026
IR2I	See Action 1 of CAR_NRW0051914 as outlined below already in place to address non-compliance	28/08/2026
IR3A(2)	Action 3 of CAR reference NRW0051914 already in place to address non compliance	21/08/2026
IR3A(1)	See Action 1 below	31/10/2026
IR3A(1)	See Action 1 below	31/10/2026
IR3A(1)	See Action 1 below	31/10/2026

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) follows a review of the Q2 (April - June) 2026 monitoring data which was submitted to NRW on 28 July 2026 in accordance with permit condition 4.2.3.

Leachate

The permit requires the operator to complete leachate monitoring as specified in tables S3.1 and S3.9.

Leachate Levels

April - Leachate level data was provided for all monitoring wells except for LMP4b in April. With reference to schedule 5 notification (HAF422), the operator states that leachate level monitoring was not undertaken due to the *dip meter hung up near top*.

May - Leachate level data was provided for all monitoring wells during May.

June - Leachate level data was provided for all monitoring wells except for LMP4a in June. With reference to schedule 5 notification (HAF426), the operator states that leachate level monitoring was not undertaken due to a blockage.

During Q2, leachate heads between 0.55m and 23.80m were recorded. Leachate levels remained

compliant in wells located in Cell 5a and 5b during Q2. However leachate levels in Cells 1, 2, 3 and 4 exceed the permitted 2m during Q2.

NRW considers this a breach of permit condition 2.7.1 and a C2-Significant- non-compliance score has been applied (IR2I-Installations -Operations - Leachate Levels-C2).

Historically, the operator has documented long standing issues, including perched leachate, blocked slotted sections of some wells and issues with pumps in Schedule 5 Notifications. The operator has provided Schedule 5 Notifications (HAF 414 and HAF 419) for Q2, which summarise the improvements implemented and proposed to reduce leachate levels across the site.

The Q1 CAR (reference NRW0051914) included an action (Action 1) which requires the Operator to continue to progress actions within the Leachate Management Action Plan (LMAP) April 2026 which ultimately requires the Operator to have completed all works to ensure compliance with the 2m permitted leachate limits by 21/08/26.

Leachate Analysis

Quarterly monitoring for the leachate parameters specified in table S3.9 was completed for operational cells.

Landfill gas

Perimeter gas monitoring

Perimeter gas monitoring was undertaken in accordance with Condition 3.5.1(d) and Table 3.6 (Landfill gas in external boreholes).

With reference to Schedule 5 Notifications HAF 420 (April), HAF 423 (May), and HAF427 (June), there were 31 instances during Q2 where methane (CH₄) levels in perimeter gas wells exceeded the 1% permitted Emission Limit Value (ELV).

On these notifications, the operator acknowledges the breaches of the 1% methane ELV for perimeter gas and states:

'Breaches where the methane to carbon dioxide ratio is much greater than or much less than 1.5 is very unlikely to be landfill gas. Much of the gas seen is believed to be mines gas.'

'This is discussed at length in the most recent annual report. Methane from the underlying coal measures was identified at the site during early preoperational investigations'

Values between 0.1 and 41.9% methane were recorded during Q2. **NRW considers this a breach of permit condition 3.1.7 and a non-compliance score has been applied (IR3A(2)-Emissions to air-C3).**

The Q1 CAR (reference NRW0051914) included an action (Action 3) which requires the Operator to continue progressing the actions included in the Landfill Gas Management Action Plan and provide NRW with an updated LFGMAP by 21/08/26.

Groundwater

Groundwater monitoring was undertaken in accordance with Condition 3.5.1(c) and Tables S3.5 (Groundwater-emission limits and monitoring requirements) and S3.11 (Groundwater - other monitoring requirements).

Samples were not taken at the following monitoring points as the operator states there was insufficient liquid to sample: BH HA 1A(T), BH HA 5(T), BH HA 9A(T), BH HA 11B(T) and BH HA 12A(T). BH 6A(B) was not sampled due to the sample tube being stuck in the well.

Q2 returns did not record any breaches of permitted ELVs.

The operator is required to carry out monthly monitoring of groundwater levels (dip to water -m- and water level mAOD). Monitoring was completed for all monitoring points.

Surface water

Surface water monitoring was completed in accordance with Condition 3.5.1(b) and (e), Tables S3.3 (point source emissions to water-emission limits and monitoring requirements) and S3.10 (surface water-other monitoring requirements).

The following ELV breaches were recorded and reported to NRW for Q2:

SW1A

SW1A has a permitted ELV for Ammoniacal Nitrogen of 1.8mg/l. A breach of the permitted ELV was recorded on 10/04/26, as follows - Ammoniacal Nitrogen at 12mg/l (10.56mg/l when lab uncertainty of 12% is taken into account).

With reference to Schedule 5 Notification HAF421, the operator has reported that investigations into the source of the breach are ongoing and measure have been implemented to minimise off-site impact. The operator also states that *Ammoniacal-N (in SW1A) is following a similar pattern to previous years and is likely linked with anoxic waters created by either decomposing leaf fall, which is discussed at length in the recent annual reports, or a build-up of silts/ accumulation of wildfowl faeces.....a decision has been taken to desilt the main Columendy [sic] feed lagoon, as soon as breeding Canada geese have left site. Discharge to the Aberderfyn has ceased following receipt of this new result and the lagoon quality is being checked before discharge recommences. We are also acquiring more accurate on-site testing capabilities to obtain immediate accurate results.....We are continuing to investigate and as part of this we plan to sample the ditch that passes the northern edge of Hafod Quarry downstream of the industrial estate, which SW1a actually discharges into, to get a view of upstream quality.'*

The operator ascertains that*'No pollution is considered to have been caused and thatPermit limits will be reviewed for their appropriateness in future*

NRW considers the breach of the Ammoniacal Nitrogen ELV at SW1A to be a breach of permit condition 3.1.1 and a non-compliance score has been applied (IR3A-Emissions and Monitoring-Emissions to Water-C3).

SW1A has a permitted ELV for suspended solids of 50mg/l. A breach of the permitted ELV was

recorded on 20/05/26 as follows – suspended solids at 67mg/l (54.94mg/l when lab uncertainty of 18% is taken into account).

With reference to Schedule 5 Notification HAF421, the operator states that the breach... *'is not considered to be due to any leachate contamination'...* and that.. *'No pollution 'incident' is believed to have occurred. Future monitoring results will be reviewed to see if the elevated concentrations continue'*.

NRW considers the breach of the suspended solids ELV at SW1A to be a breach of permit condition 3.1.1 and a non-compliance score has been applied (IR3A-Emissions and Monitoring-Emissions to Water-C3).

SW1A has a permitted ELV of pH9. A breach of the permitted ELV was recorded on 03/06/26 as follows –pH9.5mg/l (pH9.3 when lab uncertainty of 0.2% is taken into account).

With reference to Schedule 5 Notification HAF425, the operator states that the breach... *'is very unusual, and likely to be an analytical error. The laboratory have re-tested and apparently confirmed the result..... it is not considered to be due to any leachate contamination'*.

The operator states... *'No pollution 'incident' is believed to have occurred... We will resample again and soon and future monitoring results will be reviewed to see if the elevated concentrations continue.'*

NRW considers the breach of the pH ELV at SW1A to be a breach of permit condition 3.1.1 and a non-compliance score has been applied (IR3A-Emissions and Monitoring-Emissions to Water-C3).

The Q1 CAR (reference NRW0051914) included an action (Action 4) which requires the Operator to continue reviewing future monitoring results. If elevated parameters are detected in subsequent results (Q2), carry out an investigation and report outcome to NRW by 31/07/26.

Action 1 - Given that breaches of surface water ELVs have continued during Q2, the Operator must provide the findings of their investigation in report format to **NRW by 31 October 2026**.

Particulates

Quarterly monitoring was completed and both monitoring points were within the compliance limits (200mg/m2/day) specified in table S3.12.

General Management

NRW considers the root cause for the ongoing permit breaches referenced within this CAR to be due to General Management. ***This is a breach of permit condition 1.1.1 (IRA-General Management) and a C3 non-compliance score has been applied.***

Action 2: Operator to manage and operate the activities, including the implementation of necessary mitigation measures to address permit non-compliance. This should include but not be limited to actions specified in both the gas management action plan and leachate management plan. Due **30/09/2026**.

Other Actions

On 8 May 2026, NRW issued a letter requiring the Operator to carry out a number of Actions to address the ongoing breaches of permitted leachate levels. NRW are currently reviewing the Operators progress and will report findings in a separate CAR once the review is completed. The following provides a summary of the Actions:

Action 1. Conduct de-silting of all leachate wells that are subject to monitoring requirements of the Permit, herein referred to as “Leachate Wells”, and confirm completion of works with NRW by the specified date. Due 08/06/2026.

Action 2. Following completion of the de-silting works, the Operator is to; Commission and undertake a CCTV survey of all Leachate Wells, by the specified date. Organise and agree a suitable date for NRW officers to attend site and observe the Operator conducting the CCTV survey of the leachate infrastructure. This should include, but not be limited to, a manual dip to base for the Leachate Wells. Confirm the date of the CCTV survey with NRW at least 2 weeks prior to commencement. Due 24/07/2026.

Action 3. Provide NRW with a written report of the findings of the CCTV survey by the specified date. This shall include, but not be limited to, the condition of all Leachate Wells, leachate levels within each well and the manual dip to base for each well. Any obstructions/ issues within the well which could influence leachate levels should also be referenced. Due 21/08/2026.

Action 4. Provide NRW with weekly leachate level data for all Leachate Wells from 18 May 2026 to 20 October 2026. Ongoing.

Action 5. Provide NRW with all Duty of Care records for leachate removed from the site for the period 1 October 2025 to 31 March 2026. Due 8 June 2026.

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.