

Compliance Assessment Report CAR_NRW0052916

Permit being assessed: BP3390VA.

For: Standard Landfill Site, **held by:** Flintshire County Council

At: Land / Premises At, Spencers Industrial Est, Buckley, Flintshire, CH7 3LY.

Type of assessment: Site Inspection,

Reason: Routine.

On: 24/08/2026 between 10:00 and 13:00.

Parts of permit assessed: See below.

NRW Lead Officer: Sarah Walton, accompanied by Philip Harper, Hannah Ibbotson.

Report sent to: Paul Murphy, Landfill Manager, on 16/09/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	C3 Minor	A5 Closure and aftercare a) The operator shall maintain a closure and aftercare management plan.
W2C - Waste - Operations - Operating techniques	Action only (X)	
W2G - Waste - Operations - Improvement programme	C3 Minor (Suspended)	A3 (a)
W2C - Waste - Operations - Operating techniques	C3 Minor (Suspended)	A2(a)

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

Total non-compliances recorded	Total non-compliance score
3	4

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
W1A	Submit an action plan to NRW detailing how key management documents will be located, reviewed, updated where necessary and implemented. Provide realistic time frames and deadlines for NRW approval. Please submit this by 31st October 2026.	31/10/2026
W2C	Ensure that extraction is reduced from gas wells recording >5% oxygen. Conduct an assessment of air ingress into the system and report back to NRW with findings and action plan to address these issues.	16/10/2026
W2G	Please respond to this report with proposals for additional groundwater compliance limits for downgradient boreholes GW2 and GW3 for chloride and at least one other substance that is representative of compounds present in leachate from the site. Please include leachate data to support the proposals.	16/10/2026
W2C	Ensure that pumps in leachate chambers are regularly checked and maintained.	16/09/2026

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 pre-arranged meeting took place on Monday 24th August 2026 at Flintshire County Council Office in Alltami. This was a joint meeting between the operator, Flintshire County Council and regulating officers for two permitted sites; Brookhill Landfill and Standard Landfill. It was agreed that as there are common compliance issues at both sites, a joint meeting would be useful. This is expected to take place quarterly moving forward. The aim of this meeting was to check progress with outstanding actions from recent CAR reports.

Brookhill landfill was discussed first, then Standard Landfill was discussed. Paul Murphy explained progress made with outstanding compliance issues at Standard Landfill:

- Groundwater monitoring compliance limits are currently being gathered with

supporting evidence of leachate sampling to satisfy improvement condition IC1.

- The conversion factor for side slope risers is understood to be contained within historical documents. The operator is liaising with NRW to verify the conversion factor.
- Issues with leachate heads should now be rectified following replacement of pumps in S5 and LS5. A site survey has verified depth of side slope risers.
- The operator is working with a consultant to locate management documents including site closure plan and hydrological risk assessment.
- Leachate Management Plan has been located and sent to NRW, but this is dated 2011 and is in need of review. This is being followed up.

Previous CAR reports, placed actions on the operator to locate key management documents such as the Closure & Aftercare Management Plan and Hydrological Risk Assessment. This has identified that these documents are lost, do not exist or are not being used. All management documents forming the overall Closure and Aftercare Management Plan, should be regularly reviewed and utilised by site management to ensure compliance with permit conditions. The lack of key management documents is deemed the root cause of recent compliance issues on site. **This has been recorded as a consolidated C3 score under general management, permit condition A5(a).**

Management documents requiring review or new versions created:

- Closure and Aftercare Management Plan (CAMP)
- Hydrological Risk Assessment (HRA)
- Leachate Management Plan (LMP)

Key documents mentioned above should be located, read & understood by staff and used on a frequent basis, to ensure compliance with permit conditions. It is appreciated this may be quite a task to review/produce these documents for both facilities. Therefore, it is suggested the operator produces an action plan with agreed timescales to locate, review and submit these documents to NRW.

ACTION: Submit an action plan to NRW detailing how key management documents will be located, reviewed, updated where necessary and implemented. Provide realistic time frames and deadlines for NRW approval. Please submit this by 31st October 2026.

Following the meeting, Officers visited Standard Landfill to check the side slope risers and S5 sump on the east side of the site where the incident took place earlier in the year. No issues were identified on site.

Quarter 2 monitoring data 2026

A review of monitoring data for quarter 2 2026 has taken place.

Landfill Gas - In waste

Some in waste gas wells are showing signs of air ingress as recorded in table 1 of the

monitoring report:

Table 1: Wells with potential air ingress

Monitoring Point	O2 %			% above 5%
	Min	Max	Avg	
GV18	15.2	15.4	15.30	100%
GV19	5.1	5.2	5.13	100%
GV20	10.2	10.7	10.43	100%
GV3	16.2	16.5	16.37	100%
GV6	5	5.2	5.10	67%
GW61	14.2	14.5	14.40	100%
GW62	15	15.3	15.17	100%

Section 2.5.10 of the closure report states; *"Where the O2 level exceeds 5% or where the addition of CO2 and CH4 percentages is less than 80% the extraction from the gas well shall be reduced and an assessment of air ingress into the system shall be undertaken"*.

ACTION: Ensure that extraction is reduced from gas wells recording >5% oxygen. Conduct an assessment of air ingress into the system and report back to NRW with findings and action plan to address these issues.

Landfill gas - perimeter wells

Methane was only detected in BH22 this monitoring round with a maximum concentration of 0.2%.

Methane and Carbon Dioxide levels did not exceed permitted levels this monitoring round.

Surface water

No compliance issues were identified for surface water this quarter.

Groundwater / Improvement condition IC1

Improvement condition IC1 is outstanding. IC1 requires the operator to submit compliance limits for downgradient boreholes GW2 and GW3 for chloride and at least one other substance that is representative of the compounds present in the leachate. Therefore, it has not been possible to assess compliance of groundwater this quarter.

This non-compliance has been scored on a previous CAR report. The operator has also shown that they are actively working to address this compliance issue. Therefore a suspended C3 score has been applied.

ACTION: Please respond to this report with proposals for additional groundwater compliance limits for downgradient boreholes GW2 and GW3 for chloride and at least one other substance that is representative of compounds present in leachate from the site. Please include leachate data to support the proposals.

Leachate

This quarter's results show the operator has applied a correction factor to leachate heads of side slope risers LS5 and LS6, given the angle of these wells. NRW has requested further evidence to show how the correction factor has been calculated.

Leachate heads have been assessed with the correction factor applied.

LS5 recorded leachate head of 5.17m on 14/04/2026 (Limit of 2m).

The operator changed the pump in LS5 on 30th April 2026, which reduced leachate levels in this chamber to come in line with leachate head compliance limits.

The operator has previously been scored for breach of leachate heads in this well and has taken action to resolve issues with infrastructure. Therefore, this is has been recorded as a suspended C3 score.

ACTION: Ensure that pumps in leachate chambers are regularly checked and maintained.

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

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.