

This form will report compliance with your permit as determined by an NRW officer

Site	Trehir Quarry Landfill	Permit Ref	GP3392EH		
Operator/Permit holder	Caerphilly County Borough Council				
Regime	Waste Operations				
Date of assessment	29/11/2017	Time in	15:00	Out	16:15
Assessment type	Report/Data Review				
Parts of the permit assessed	See below				
Lead officer's name	Ward, Tyrone				
Accompanied by	Taylor, Richard				
Recipient's name/position	Rhodri Lloyd/ Service Manager	Date issued	04/12/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
B1 - Infrastructure - Engineering for prevention and control of emissions	C3	57
	C4	57
B2 - Infrastructure - Closure and decommissioning	A	
C2 - General Management - Management system and operating procedures	C3	57
D1 - Incident Management - Site security	C4	57
E1 - Emissions - Air	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	A	
F5 - Amenity - Deposits on road	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	4	Total compliance score (see section 5 for scoring scheme)	8.2
------------------------------------	----------	---	------------

If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Monthly monitoring data

2017 monitoring data (Groundwater, Leachate, Surfacewater and Landfill gas) received and reviewed.

Advice offered for maintaining access to the In-waste leachate level monitoring points (with replacing / reinstating the points that are lost / damaged) so that potential issues can be identified at an early stage. The field data in Appendix 14 of Annual Report below details that 6/10 are UTL, also refer to site inspection comments. Considered non compliance CCS 3 in first instance.

Settlement Survey

2017 Settlement Survey received, comments made in section 4.3.5 of Annual Report below noted.

AER (condition 55 of permit)

2017 Report received and reviewed, including TG, flare and engines monitoring data.

Conclusions and planned further improvements in Section 9 noted.

In relation to a potential reed bed treatment system, the ammoniacal nitrogen monitoring results are also noted.

No complaints received during the reporting period.

Site Inspection 29 Nov 17

There is an extensive area of waste items (adjacent to the haul road at the toe of the site, and on the track, down to the proposed reed bed area) which requires retrieval. A waterra tube also appears to have been removed from nearby groundwater sampling point; this should be re-instated as soon as practicable. Appears to relate to unauthorised persons having been on the landfill and adjacent household waste site.



Photo 1 showing some of the loose waste items

Random inspection of perimeter gas monitoring points again shows gas bungs/taps absent, meaning sampling will be unrepresentative.



Photo 2 showing an open gas monitoring point with ivy inside security cover

A new track has been constructed though phase 1 area of landscaping. Action CCBC - please advise whether this relates to improving access, locating or re-instating some of the leachate level monitoring points? (NRW e-mail 7th Sept17)

In-waste leachate level monitoring should be done on a quarterly basis; however, it's noted that several wells have unable to be located. Wells in the 2006 assessment are: -

M1/2

M1/4

M2/1 UTL (previously dry or blocked?)

M2/2 UTL

M2/4 UTL

M2/5 UTL

Results were reported for these wells up to Sept 2015. Is the difficulty in finding them because the planting scheme has become overgrown? Or have the wells been buried? The location of all the In-waste leachate wells is shown on Drawing no CG602 - Trehir landfill Phase 1 Capping and Drainage Works CQAP Sept 2003, Arup 68503. (The drawing also includes 'vent points', some of which may have been decommissioned to improve gas collection) If the leachate wells cannot be located, then CCBC should review the information to date, and propose any alternative monitoring locations and stability assessment levels.



Photo 3 showing new track through phase 1 planting area

The area of bare restoration soil on phase 2 flank is now fenced off; this is preventing further damage by grazing sheep. Noted no discernible expansion since previous inspection.



Photo 4 showing bare restoration soil, phase 2 flank

In the Gas compound, gas going to the Engine (emissions testing and inlet gas analysis included in Annual Report, emissions are compliant)

No amenity issues recorded during time of inspection.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0032469**

This form will report compliance with your permit as determined by an NRW officer

Site	Trehir Quarry Landfill	Permit Ref	GP3392EH
Operator/Permit holder	Caerphilly County Borough Council	Date	29/11/2017

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
B1	C3	discussed regular inspection and repair to enable representative samples to be taken	30/11/2017
C2	C3	Planned improvements detailed in section 9 of AER	29/12/2017
B1	C4	On going, noted that no discernible expansion of bare soil area	29/12/2017
D1	C4	Existing site security arrangements should be kept under review	29/12/2017

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.