

## Compliance Assessment Report

**Report ID:**  
**CAR\_NRW0026514**

**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	17/10/2016	Time in	10:30	Out	14:30	
Assessment type	Audit					
Parts of the permit assessed	See below					
Lead officer's name	Ward, Tyrone					
Accompanied by	ALS					
Recipient's name/position	Rhodri Lloyd/ Service Manager	Date issued	21/10/2016			

### 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
A1 - Infrastructure - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	C4	2.1
B2 - Infrastructure - Closure and decommissioning	A	
C1 - Infrastructure - Staff competency/training	A	
C3 - Infrastructure - Materials acceptance	A	
D1 - Infrastructure - Site security	A	
F1 - Infrastructure - Odour	A	
F2 - Infrastructure - Noise	A	
F3 - Infrastructure - Dust/fibres/particulates and litter	A	
F4 - Infrastructure - Pests/birds and scavengers	A	
F5 - Infrastructure - Deposits on road	A	
G1 - Infrastructure - Monitoring of emissions and environment	A	
G4 - Infrastructure - Reporting and notification to Natural Resources Wales	C4	5.6

**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.

<b>Number of breaches recorded</b>	<b>2</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>0.2</b>
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**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

### Site inspection 17th October

#### Check monitoring and sampling

TW accompanied ALS technicians to observe sampling procedures. Random checks of leachate, groundwater and perimeter landfill gas sampling.

Appropriate equipment is in place along with techniques for collection, handling and storage of samples. Field results with comments recorded on a spreadsheet. **Action** ALS/CCBC to ensure that sampling technician's comments are reported; and that any remedial measures are carried out in a timely manner. This includes, for example:-

- Unable to locate monitoring points due to overgrown areas, and
- Defective headworks such as missing caps or bungs, bent casing, or unable to reach a Waterra tube.

#### Site inspection

The planting areas are now well established, including rough pasture use on phase 2.

Weather during the visit was very heavy and persistent showers. Despite this the surface water collection ditch along at the toe of the site remained largely dry. On the shallower section some vegetation was noted, along with general debris. **Action** CCBC to clean the concrete cloth section of ditch out.

We discussed access to the leachate level monitoring points on phase 1 flank. Some of the wells are in a planting area, which is now heavily overgrown. (As a result ALS were unable to locate 3/10 of the wells) **Action** CCBC to improve access to, locate and mark all phase 1 LL wells, and ensure they remain in a serviceable condition.

Random inspection of perimeter sampling points – since last inspection bungs and taps have been replaced; though see comments above.

There is a bare soil strip on the phase 2 flank which has persisted since the last inspection; and over the summer. This strip is also visible from the main A469 road. TW used a gazomat TDL methane analyser to measure surface emissions, with results <10ppm. (On 6th July 15 however 700-800 ppm was recorded) The strip corresponds to surface water collection pipework connecting two chambers. This system overlays the GCL cap. Whilst some local settlement / movement may be expected, there is no obvious instability or outbreaks in the surrounding area. The bare soil strip is not thought to be the result of sheep or burrowing animals. **Action** CCBC to investigate further, and submit proposals.



Photo showing bare soil strip on Phase 2 flank

The gas engine was not running during inspection, with all gas going to the flare. After an enquiry to AlphaGen, they reported that the engine has been performing extremely well recently, however there may be an issue with condensate. **Action** AlphaGen/NRW to discuss improving condensate management.

Random inspection of gas extraction wells revealed that all were turned on, but no apparent flow (very low flow likely) Due to settlement, it is likely that some wells may have become blocked or damaged. **Action** CCBC please forward the latest dip results and details of any camera surveys. Some wells may require de-silting, or blocked/damaged wells may be considered for decommissioning / replacing.

#### Other matters

Separately, there is some HHW has been fly tipped outside of the CA site, discussed with CCBC to arrange for removal.

2016 monthly monitoring data and Annual Performance Report received and reviewed.

## EPR Compliance Assessment Report

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Operator/Permit holder	Caerphilly County Borough Council	Date	17/10/2016

### 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.

### 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	C4	Discussed ongoing improvements	30/12/2016
G4	C4	Need to improve reporting procedures	30/12/2016

## 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](mailto: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.