

Harvey Mitchell
Waste Management Service
Flintshire County Council
Alltami Depot
Mold Road
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Flintshire
CH7 6LG

Ein cyf / Our ref: AP3739KS
Eich cyf / Your ref:

Dyddiad/Date: 16 Dec 2014

Dear Mr Mitchell

Brookhill Landfill Site – Leachate Management and Groundwater Protection

Thank you for the response prepared by Caulmert following our meeting on 6th November. Having discussed the document with Martin Doherty we would agree with it for the most part and recommend the following actions:

1. To minimise future uncertainties in data collection the leachate management plan should be updated as described; staff should receive refresher training for monitoring, and the leachate monitoring infrastructure be improved. The mAoD levels used for reporting leachate levels need to be checked and an explanation given for the negative values that have been reported. We require confirmation from you that the correct datum levels are being used when calculating leachate and groundwater level data.
2. Leachate trigger levels should be proposed with consideration of minimum groundwater levels observed in September 2011. However as all the monitored wells have been maintained at leachate heads below 2m in recent months, apart from R5, the original permit leachate heads should be achievable. Knowing the volumes of leachate pumped from each well will be useful in understanding the ingress of groundwater to each cell. Efforts should be concentrated on reducing the leachate level in R5.
3. A review of the assumptions used in the HRA when reviewing the assessment; also the use of the correct model for the groundwater conditions – ie the hydraulic containment spreadsheet for sub-water table conditions. If assumptions or information have changed since previous modelling was submitted then further modelling may be required. You may wish to submit an outline plan of the proposed HRA review to NRW for agreement before commencing the work.
4. Groundwater quality compliance limits for those parameters that do not have agreed limits should be proposed as a separate submission from the HRA review to prevent any further delay in agreeing them. Your proposal with accompanying values should be submitted to NRW within 2 months of the date of this letter.

5. The trial of flow monitoring on cell 5 should be carried out within 2 months and recommendations then made to NRW within a further month from that data.
6. Graphical trends of data should be provided as described, and also used by Flintshire County Council to assess whether action is needed to prevent a non-compliance, e.g. if leachate levels start to rise.

Our proposal to carry out further investigations to establish the cause of poor groundwater quality in the vicinity of GW3 is something that NRW would like to undertake jointly with Flintshire County Council and/or your consultants. We will investigate what is needed and how much it will cost. Please confirm that in principle that you would be willing to make a financial contribution to this project. We cannot say that we would not change our regulatory stance if this is carried out and determines that Brookhill has been adversely impacting the environment.

Yours sincerely



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