

Compliance Assessment Report

Report ID:
CAR_NRW0033280

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

Site	CWMRHYDYCEIRW QUARRY LANDFILL	Permit Ref	TP3835LV		
Operator/Permit holder	SI Green UK Limited				
Regime	Installations				
Date of assessment	16/03/2018 - 02/05/2018	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	4.2.1				
Lead officer's name	Thomas, Ffion				
Accompanied by					
Recipient's name/position	Guy Titman/ MJCA consultant	Date issued	02/05/2018		

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
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	0	Total compliance score (see section 5 for scoring scheme)	0
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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

This compliance assessment report (CAR) form has been completed following the review of the Cwmrhydyceirw landfill "combined dataset 2017" annual report and performance review as per condition 4.2.1 of the permit.

The report was submitted via email to NRW on the 16th March 2018 (as per agreed submission timeframe extension) the condition is subdivided into 9 areas A-I and a response has been provided under each heading.

The landfill is non-operational and has not been constructed. Emission monitoring is being undertaken at the site (there is a historic landfill deposit of waste at the site)

No waste has been accepted.

4.2.1 (a) The summary review of the emissions data confirmed no compliance breaches.

Ground & surface water discharge: A schedule 6 notification was received related to an emission limit breach of cadmium (0.96ug/l detected against limit of 0.4ug/l) the agreed action plan was followed diverting the discharge to sewer and re-sampling confirmed the return to within limit prior to switching back to discharge to the Cwmrhydyceirw stream.

The volume of discharge is consistent with that used in the H1 risk assessment at 135,678m³ for the period Jan – Dec 17.

Leachate, Groundwater & surface water quality monitoring: No notifications were received for emission limit breaches. It is noted the concentrations in general are consistent with 2015 and 2016 data.

The trend is said to demonstrate falling concentrations of ammonical nitrogen and chloride recorded previously in the ground and surface waters. The concentrations of metals in the leachate are low and similar to the concentrations recorded in the groundwater. In general, the concentrations are said to be higher in the groundwater than in the combined ground and surface water sump. Concentrations of contaminants in the leachate do not exceed the control level set in

the HRA.

Groundwater and leachate levels: No notifications were received for emission limit breaches

The levels are reported to be consistent and said to confirm the conceptual model (2014 HRA) assumption that groundwater in proximity to the existing landfill area flows to the combined groundwater and surface water pumps.

Landfill gas monitoring: The report details a methane levels above 1.0%vol at borehole LFG36 for the period February – April 2017. On checking back through the site files of the site monitoring submissions I have been unable to find the submission for Q1 (Jan- March) 2017. Staff changes occurred at this time.

Following email discussion a submission of the Q1 data was submitted and confirmation that the monitoring had been assessed as part of the annual report.

A submission for Q2 was received including the April level breach. The levels returned to below limit in May and for the remainder of the year.

Other reporting requirements

- (b) *where the operator's management system encompasses annual improvement targets, a summary report of the previous year's progress against such targets;*

There are no improvement targets against which to summarise progress.

- (c) *the energy consumed at the site, reported in the format set out in schedule 5 table S5.3*

The landfill currently is not operating hence the energy consumed at the site is minimal

The energy usage at the site for the calendar year 2017 is 28,831kWh (28.831MWh) which is slightly lower than the energy usage at the site for the calendar year 2016 of 33,246 kWh (28.356MWh).

- (d) *the annual production/treatment set out in schedule 5 table S5.2;*

The volume of leachate discharged to sewer in the period January 2017 to December 2017

inclusive was 303m³ which represents a decrease in the annual volume discharged compared with 2016 (1,110m³)

It is understood that no groundwater and/or surface water was discharged to sewer during the period January 2017 to December 2017 inclusive.

The volume of groundwater and/or surface water discharged to the Cwmrhydyceirw Stream during the period January 2017 to December 2017 inclusive was 135,678m³.

- (e) *details of any contamination or decontamination of the site which has occurred;*

It is understood that there has been no contamination or decontamination of the site undertaken during the reporting period.

- (f) *the topographical surveys required by condition 3.6.3 other than those submitted as part of a CQA validation report;*

Topographical surveys of different areas of the site have been carried out previously and reported to the Environment Agency. As the landfill currently is not operating no additional topographic surveys have been undertaken with respect to Condition 3.6.3 in 2017.

- (g) *the volumetric difference (reported in cubic metres) between the most recent topographical survey and the previous annual topographical survey i.e. the additional volume of the landfill void that is occupied by waste;*

As the landfill site is not operating no waste has been deposited at the site during 2017

- (h) *an assessment of the settlement behaviour of the landfill body based on the difference between the most recent topographical survey and previous annual topographical survey for the areas of the landfill which did not receive waste between the surveys;*

As no waste has been deposited at the site since the permit was issued in 2008 and no additional topographical surveys have been carried out no assessment of the settlement behaviour of the waste at the site has been carried out.

- (i) *a calculation of the remaining capacity (reported in cubic metres) derived from the pre-settlement contours and the most recent topographical survey.*

No waste has been deposited at the site since the original permit was issued in December 2008.

The void available at the site for imported waste is approximately 800,000 m³

END

EPR Compliance Assessment Report

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Operator/Permit holder	SI Green UK Limited	Date	16/03/2018

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			

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.