

Compliance Assessment Report CAR_NRW0039956

Permit being assessed: BU8819IV.

For: Pwllfawatkin Landfill Site EPR/BU8819IV, held by FCC Waste Services (UK) Limited

At: Pwllfawatkin Landfill Site, Pontardawe, SWANSEA, West Glamorgan, SA8 4RX.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 03/05/2022 between 11:00 and 13:00.

Parts of permit assessed: See section 4

NRW Lead Officer: Ffion Thomas.

Report sent to: Richard Thomas, Site Manager on 27/05/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	

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

Total number of non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

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.

At this time, we do not intend to take any further action.

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

Onsite inspections (3) reviewing engineered capping works

Ffion Thomas undertook a site visit on the 8th March, 19th April, and 3rd May. The purpose

of these visits were pre-start, progress and close down meetings to review phased permanent and temporary capping works and undertake an offsite olfactory assessment.

A delay in uploading this CAR form has been due to annual leave and training conferences resulting in absences.

Ffion Thomas undertook an onsite visit during all 3 engineering meetings as a review of the phased permanent and temporary capping engineering works, used to minimise rain ingress, reduce odour emissions, improving gas collection.

Pwllfawatin has an agreed phased capping CQA plan to undertake these works. No amendments were made to the CQA plan, updated drawings of the areas to be capped were submitted prior to commencement as required, email submissions received and filed 20/12/22 drawing ref 479A471 and restoration soils plan received 1/3/22.

8th March pre-start meeting summary:

Present:

Graham Cherrill – FCC Quantity surveyor

Sam Roberts – Jones Bros

George Augood – Infinis, (gas management)

Richard Thomas – FCC, site manager (leachate management)

Mark Cooper – Sirius, CQA consultant

Ffion Thomas - NRW

Construction of the capping shall generally involve:

- permanent (Perm) sacrificial geosynthetics liner Cap
- Installation of a fully welded, 1 mm thick, double textured Linear Low or High Density Polyethylene (LLDPE / HDPE) geomembrane liner over the regulated surface;
- Tie into existing lining system.
- 1m Soils and drains to be placed on areas as discussed on site.
- Temporary (temp) sacrificial geosynthetics liner Cap
- 1mm Plastic, tied into existing areas of Temp Cap

Gas, to be managed by George Augood during capping works:

Leachate, to be managed by Richard Thomas during capping works.

Total wells within Perm and Temp cap areas:

3 within Temp cap

8 Within the Perm Plastic Cap on the front southern flank

Areas of Perm Cap, Temp Cap & Restoration confirmed during the site walk round and confirmation of gas pipeline disconnections required during works. The gas field would only be turned off in areas as work commenced and turned back on when completed.

The upper surface of the soil layer must be places such that damage to the geosynthetics will not occur in terms of ripples or undulations, protruding sharp objects such as stones, and soft materials. Such issues are controlled by inspections required by the CQA Plan.

During the visit the regulation compacted soil layer placed to date was visually checked and no undulations noted nor sharp objects protruding.

19th April Offsite odour assessment undertaken.

Ffion Thomas undertook an odour assessment before arriving at the Pwllfawatkin site. Having previously regulated the site Ffion is aware of locations that have historically reported odours, using this knowledge along with review of the odour assessment locations used by colleagues in summer of 2021 several locations were visited as detailed in the table below.

In line with Horizontal guidance H4 appendix 1 for undertaking sniff testing no strong-tasting foods or drinks had been consumed. No perfumes or heavily scented toiletries applied. No car air freshener in place. No cold/flu symptoms were experienced.

time	Location	Observations
Approx. 10:30	Driving with windows open Layby on Gelli Gron Rd, Rhyd y Fro, opposite turning for Waun Gron. SN71488 05138	No landfill odours noted.
Approx. 10:35	Driving with windows open Road bridge on lane opposite travellers well, Rhyd y fro. SN71241 05734	No Landfill odours noted.
Approx 10:38	Driving with windows open Layby on A474 south of Abernant Ind Est north Rhyd y Fro SN70430 07640	No landfill odours noted

Approx. 10:40	Driving with windows open along Pontardawe road. 1st terrace of houses, North of Landfill entrance turning. SN 70317 08773	Odour noticed, similar to composting type odour not landfill gas. Car windows open.
Approx 10:42	Driving with windows open Layby on entering Cwm Gors, SN70346 09692 – SN70333 09966	No Landfill odours.
Approx 10:45	Driving with windows open Parked at residential lane opposite Parc y Werin Brynman Rd. SN70181 12308	No Landfill odour noted. No other odours noted.

Findings:

Odour consistent with degrading waste, like that smelt at composting facilities was detected off site at 1 location as highlighted red in the table above.

19th April Progress Meeting summary:

Present:

Graham Cherrill - FCC Quantity surveyor
Richard Thomas - FCC, site manager (leachate management)
George Augood - Infinis, (gas management)
Mark Cooper & - Sirius, CQA consultant
Nathan Beaumont - CQA engineer.
Matt Nicholson – Jones Bros
Ffion Thomas - NRW
Apologies Sam Roberts – Jones Bros

(see photos slide number 1-15 of attached presentation)

The works mobilisation commenced on the 4th April and capping was progressing within agreed timeframe. The northern sections lining was completed and the Geo-composite Drainage Layer (GDL) had been completed and restoration soils due for placement.

Capping on the southern flank was now completed with an extra 50x5m perm area added due to the raise in waste inputs giving final profile. Western edge being worked on. These areas are not due to have restoration soils placed yet as this will be undertaken following CQA plan updates of the soil buttress design, no GDL in these areas. Perm section completed on the Eastern edge.

Perm capping had been completed on the northern side (cell 2) with GDL in place and restoration soils to be completed.

4th of May was the predicted end date (2 weeks remaining)

Restoration soils were already on site from stockpiles previously received and deemed suitable for use, weather permitting.

Gas – EPS were assisting Infinis with the moving of gas lines and disconnection/reconnections of the wells as works progressed. No wells were disconnected on the East of the site during this visit.

CQA – conformance samples had been taken of GDL as required, restoration soils assessed and deemed acceptable. 12 well boots of geomembrane had been prefabricated ready for use.

Temp cap (LLDPE) on eastern corner was being placed. Panels 1-10 in place and welded into the existing perm cap with an anchor trench at the haul road with soils being placed to back fill. The gas main was back on in this area.

During the site walk over this area was inspected. The timeframe of the works undertaken in this area, excavating the anchor trench, appeared to co-inside with the 12 odour reports that had been received. No issues were reported relating to the Gas Utilisation Plant performance, with the engines operational at time of the visit. The active tipping face is of a small size.

The odour reports were substantiated given the offsite odour observations documented above, but as works were being undertaken in compliance with the permit and CQA plan

no non-compliance breaches with permit conditions were identified at the time of this visit.

ACTION FCC Anchor trench backfill along haul road to be completed by end of day. – **Completed** as witnessed in next visit.

3rd May close down Meeting summary:

Present:

Graham Cherrill - FCC Quantity surveyor
Richard Thomas - FCC, site manager (leachate management)
George Augood - Infinis, (gas management)
Mark Cooper & - Sirius, CQA consultant
Nathan Beaumont - CQA engineer.
Matt Nicholson – Jones Bros
Ffion Thomas - NRW

(see photos slide number 1-25 of attached presentation)

General De-mobilisation had commenced.

CQA – No issues raised. All LLDP and GDL was completed, conformance samples sent off for testing. 2 trail pits had been dug and used for restoration soils conformance checks, found acceptable. Restoration soils had been placed on West and Eastern flanks. 15 geomembrane boot details completed for monitoring points (gas and leachate) 1 leachate well resealed.

Drainage spines were to be completed on Northern area (Cell 2) capped restoration soils. Slide together perforated drainage pipe and quarry stone for lining the drainage ditches had been delivered. The surface water drainage was being undertaken and witnessed during the site walkover with channels aligning to existing drainage.

Checks were undertaken of the haul road and the works to infill the anchor trench completed.

Gas – EPS and Infinis contractors had been on site daily and available throughout to turn on/off wells and assist in moving lines. Scavenger and pin wells to be installed. Gas management running and normal.

Recognising that gas could now be migrating towards the uncapped top of cell 4 it was agreed that work on placing soil regulation layer would concentrate along the LLDP perm cap anchor trench. Weather permitting this work was scheduled to be completed in 2 days.

ACTION FCC Anchor LLDP along top of southern flank, to be completed within 2 days and communicate to NRW when this regulation layer/ anchoring work has been completed.

COMPLETED confirmation received via email dated 26/5/22.

The active tipping face is of a small size. Current waste inputs have increased due to a local transfer station experiencing downtime of shredders. No non-conforming wastes were seen/identified.

FCC confirmed via meeting notes:

The list below requires completion with CQA supervision prior to demobilisation:

- *Completion of Spine Drains*
- *Cover material on tie-ins/open edges of capping for extra odour control*

All works to be signed off by Site Manager and CQA before demobilising site

Feedback – There had been good communications between all parties during these capping works. Acknowledgement was made of the odour complaints, identified to be connected with the excavation of an anchor trench in areas known to be emitting gas, the completion of this engineered capping work and cessation of reports appears to verify the investigation findings.

FCC will now start planning their next phase of engineered permanent capping approximately in August. Gas infrastructure will be programmed for installation ahead.

FCC ACTION Forward CQA Report once compiled by CQA inspector and signed off by CQA engineer.

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 only relating to the activity assessment
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.

What are suspended scores?

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 Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at 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.