

	EPR Compliance Assessment Report	Report ID: BU0800IZ/0244441			
This form will report compliance with your permit as determined by an NRW officer					
Site	LLANDDULAS LANDFILL SITE		Permit Ref	BU0800IZ	
Operator/ Permit holder	3C Waste Limited				
Date	25/03/2015		Time in	09:45	Out 12:45
What parts of the permit were assessed	inspection of landfill gas infrastructure, review of quarterly environmental monitoring.				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
					Water Discharge
Recipient's name/position	Peter Taberner / Unit Manager				
Officer's name	Aled Zachary		Date issued	24/04/2015	

Section 1 - Compliance Assessment Summary					
This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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					Condition(s) breached
a) Permitted activities	1. Specified by permit	A			
b) Infrastructure	1. Engineering for prevention & control of pollution	A			
	2. Closure & decommissioning	N			
	3. Site drainage engineering (clean & foul)	N			
	4. Containment of stored materials	A			
	5. Plant and equipment	A			
c) General management	1. Staff competency/ training	N			
	2. Management system & operating procedures	A			
	3. Materials acceptance	A			
	4. Storage handling, labelling, segregation	A			
d) Incident management	1. Site security	A			
	2. Accident, emergency & incident planning	A			
e) Emissions	1. Air	C3		3.3.5;	
	2. Land & Groundwater	C4		3.2.3;	
	3. Surface water	A			
	4. Sewer	N			
	5. Waste	N			
f) Amenity	1. Odour	A			
	2. Noise	A			
	3. Dust/fibres/particulates	A			
	4. Pests, birds & scavengers	A			
	5. Deposits on road	A			
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A			
	2. Records of activity, site diary, journal & events	A			
	3. Maintenance records	N			
	4. Reporting & notification	A			
h) Resource efficiency	1. Efficient use of raw materials	N			
	2. Energy	N			
KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk), A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored					

Number of breaches recorded	2	Total compliance score (see section 5 for scoring scheme)	4.1
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Review of Landfill operations and Gas Collection Infrastructure.

Waste inputs to the landfill remain relatively low compared to previous years and are not predicted to recover due waste disposal trends presently. The site has received a major upgrade to the gas main with it being moved to facilitate landfill operations. Issue reported by local residents regarding litter in the woods adjacent to Phase 2 to the east of the site had been resolved.

Survey work for further permanent capping works planned to Phase 3A (North) has been completed and the works are due to start imminently including the submission of CQA documentation. Temporary capping of the western flank is to be replaced with permanent capping and the permanent cap on the eastern flank will be extended up to the current tipping plateau.

A review of gas collection infrastructure and actions from previous audit was undertaken:

D264 had a pump located in it extracting leachate, the well had good gas flow and no odour

D284 had received a pump and a new boot detail around the bentonite seal. Good flow audible and no odours.

D279, no pump in place but replacement boot detail and good flow

D280, no pump in place but replacement boot detail and good flow

D278, no pump in place but replacement boot detail and good flow

D291 had received a pump and a new boot detail around the bentonite seal. Good flow audible and no odours. This well had been recorded as "No Apparent Flow" during the last audit of the 19/12/14.

D292 had received a pump and a new boot detail around the bentonite seal. Good flow audible and no odours.

A slight landfill gas odour was detected around where the haul road passes close to the western flank of P3AN, this historically has been related to a line of old pin wells adjacent to the temporary capping anchor trench tie in.

Quarterly Monitoring Report.

I have reviewed the following quarterly monitoring report as required by Condition 4.2.2 of the Permit: Llanddulas Landfill site quarterly environmental monitoring report 1st November 2014 to 31st January 2015.

Groundwater.

Requirements - Condition 3.6.1(c) requires monitoring of groundwater quality as per tables S4.4 & 4.10 of the permit. Condition 3.2.3 states that the trigger levels for emissions into groundwater shall not exceed the levels set out in S.4.4.

Findings - One exceedance for potassium in GWBH36 was recorded in the monitoring period on the 13/01/15 showing a potassium exceedance of 39mg/l verses a permit limit of 12mg/l GWBH06R continues to display elevated levels also. Neither borehole shows signs of other chemical species that would indicate the results could be due to groundwater contamination, both boreholes are to be monitored for further trends in potassium levels.

This has been scored a CCS Category 4 breach of the permit

Fugitive Emissions Monitoring.

Requirements - Condition 3.3.5 states the limits for landfill gas arising from the installation shall not exceed the limits set in table S.4.11. Flame Ionisation Detector (FID) surveys are required to be conducted monthly at the site boundary and in the immediate vicinity of gas and leachate well heads and monitoring points.

Findings - FID surveys carried out during the monitoring period found a total of 14 breaches of the 1000ppm permit limit for fugitive methane emissions in the vicinity of gas and leachate well heads. This is an decrease in comparison to the previous reporting quarter, in which only 24 breaches were recorded. . Complaints of landfill gas odour received by NRW remained relatively low.

Gas Infrastructure D267, D268 and D281 are noted as exceeding the permit limit on consecutive months. These 3 items of gas infrastructure were also breaching on the previous quarter FID monitoring results.

As a result of consecutive breaches over a sustained period these have been scored a CCS Category 3 breach of permit requirements.

Lateral Migration of Gas.

Requirement - Condition 3.1.2 Schedule 4, S4.5 requires Methane concentrations in perimeter boreholes to be less than 0.5% above background.

Findings - No breaches of external gas borehole limits were noted for either monitoring period.

******Report Ends******

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Operator/ Permit	3C Waste Limited	Date 25/03/2015

Section 3- Enforcement Response	Only one of the boxes below should be ticked
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.	☐
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.	☒
We will now consider what enforcement action is appropriate and notify you, referencing this form.	☐

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
E1	C3	The causes of gas wells that fail fugitive emission limits on consecutive monitoring periods should be investigated. It is concerning certain gas wells are breaching on 3 consecutive months without any obvious corrective action being taken.	N/A
E2	C4	Increased sampling or purging of wells that are failing for elevated potassium but not other chemical species should be considered.	N/A

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.