

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

Site	Llanddulas Landfill EPR/BU0800IZ	Permit Ref	BU0800IZ		
Operator/Permit holder	3C Waste Limited				
Regime	Installations				
Date of assessment	03/11/2016	Time in	09:30	Out	15:00
Assessment type	Audit				
Parts of the permit assessed	1.1,3.1, 3.3				
Lead officer's name	Roberts, Anthony				
Accompanied by	Ellis, Rhys,McGregor-Andrew, Sian				
Recipient's name/position	Chris Bennion/ Site Manager	Date issued	02/12/2016		

### Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
B1 - Infrastructure - Engineering for prevention and control of emissions	C3	1.1.1
E1 - Emissions - Air	C3	3.1.1,3.3.1, 3.3.5.

**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>8</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

### REVIEW OF GAS INFRASTRUCTURE - AUDIT 2 DAYS

#### Non Compliances:

#### **B1 - Engineering for prevention and control of emissions.**

**Requirements** - Condition 1.1.1(a) states;

The activities shall be managed and operated:

In accordance with a management system, which identifies and minimises risks of pollution including those arising from operations, maintenance, accidents, incidents and non-conformances and those drawn to the attention of the operator as a result of complaints.

**Findings** – Landfill gas infrastructure was showing signs of reduced efficiencies due to degraded infrastructure. Management plans and associated documents should ensure that any reduction in the efficiency of infrastructure should be addressed at the earliest possible opportunity.

Please refer to associated documentation referred to at the bottom of this report for full details.

As a result these findings have been scored a **Category 3 CCS**

#### **E1 - Emissions, Air**

**Requirements** – - Condition 3.1.1; there shall be no point source emissions to water air or land except from the sources and emission points listed in schedule 4 tables S4.2, S4.3 and S4.4.

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.

- Condition 3.3.1 states that; Fugitive emissions of substances shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures have been taken to prevent or where that is not practicable, to minimise those emissions.

**Findings** – Gas infrastructure, well performance and fugitive emissions around landfill gas and leachate infrastructure were assessed by physical inspection. Gas emissions and quality were measured using a Gazomat portable methane detector and a GA2000+. The results are provided in the methane emissions survey, Gas well survey and report summary submitted to the site manager on the 14<sup>th</sup> November 2016. As

well as the breaches of the 1000ppm limit there were ambient concentrations which indicate the requirement for improved gas capture. This will be achieved by the installation of new drilled wells, and the de-watering and re-sealing of existing wells.

As a result these findings have been scored a **Category 3 CCS**

### **Other Findings/Actions**

1. Infinis are to ensure that they assess breaches observed during FID surveys immediately and inform the site manager of actions to ensure multiple breaches do not occur so as to reduce future emissions and concomitant CCS scores.
2. Short update bullets points of findings and actions in regard to the above should be provided from Infinis to the manager and referred to NRW as agreed during the site meeting.
3. A simple reporting system should be established for issues with flooded wells, poor sealing, condensate in pipe-work, poorly laid leaking lines, air leaking from pneumatic fixings for pumps, non-cycling of pumps in wells, wells which have been suddenly shut off for high oxygen/balance gas, wells which are under positive pressure including the combination of positive pressure and high H<sub>2</sub>S. This should be succinct and forwarded to NRW where appropriate.
4. Latest well dips show many wells with high levels of perched leachate, reducing extraction efficiency.

Please note and expedite the recommended actions in the well analysis table previously submitted. This includes the issues with tilted wells, kinked/blocked pipe-work, no apparent flow in some wells, localised odour (on site and in proximity of the well) and the urgent requirement for pumping down of flooded wells and replacement/re-drilling of new wells where this is necessary.

**NOTE:** Bag samples are required to confirm exact levels for high H<sub>2</sub>S in all wells where the levels were identified in the attached table as off scale. Where H<sub>2</sub>S is high in individual wells and they are under positive pressure or have leaking seals so that gas is escaping from the area around the well these wells should be flagged as higher risk, especially in areas of depression and still air conditions.

### **Documents for Action Submitted to FCC Site Manager on the 14<sup>th</sup> November 2016**

1. Report Summary
2. Methane Emissions Survey
3. Gas Well Survey

**NOTE:** The actions required and deadlines for completion of those actions are contained in three reports referred to above, they therefore form part of this CAR form and should be expedited as such.



## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0026727**

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

Site	Llanddulas Landfill EPR/BU0800IZ	Permit Ref	BU0800IZ
Operator/Permit holder	3C Waste Limited	Date	03/11/2016

### 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.

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.

### 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			
E1	C3	Improve infrastructure - Detailed actions submitted to FCC in previously submitted reports on the 14th November 2016	27/01/2017
B1	C3	Upgrade infrastructure-see reports submitted to FCC on the 14 November 2016	27/01/2017

## 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 reports 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 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.