

Compliance Assessment Report

Report ID:
CAR_NRW0033104

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

Site	Pwllfawtkin Landfill Site EPR/BU8819IV	Permit Ref	BU8819IV		
Operator/Permit holder	FCC Waste Services (UK) Limited				
Regime	Installations				
Date of assessment	27/03/2018 - 28/03/2018	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	4.1.2 Annual report				
Lead officer's name	Thomas, Ffion				
Accompanied by					
Recipient's name/position	Russell Bromage/ Enviornment Manager	Date issued	28/03/2018		

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
C2 - General Management - Management system and operating procedures	A	
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
-----------------------------	---	--	---

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 review of the Pwllfawatkin landfill site Annual Environmental Data review 1st January 2017- 31st December 2017.

The Annual report was received by email on 1st March 2018 (following agreed submission extension) The site also submitted performance data via email received 26th January 2018.

Both reports meet the reporting requirements of conditions 4.2.1 of the permit:

4.2 Reporting

4.2.1 A report or reports on the performance of the activities over the previous year shall be submitted to the Agency by 31 January (or other date agreed in writing by the Agency) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with this permit against the relevant assumptions, parameters and results in the risk assessments submitted with the application;
- (b) where the operator's management system encompasses annual improvement targets, a summary report of the previous year's progress against such targets;
- (c) the energy consumed at the site, reported in the format set out in schedule 5 table S5.3
- (d) the water consumed at the site, reported in the format set out in schedule 5 table S5.3;
- (e) the annual production/treatment set out in schedule 5 table S5.2;
- (f) details of any contamination or decontamination of the site which has occurred;

Variation Number YP3333MK
(Schedule 3)

Page 9

Date of issue 28 March 2008

-
- (g) the topographical surveys required by condition 3.6.3 other than those submitted as part of a CQA validation report;
 - (h) 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;
 - (i) an assessment of the settlement behavior 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;
 - (j) a calculation of the remaining capacity (reported in cubic metres) derived from the pre-settlement contours and the most recent topographical survey; and
 - (k) the compliance testing undertaken in the period.

The following discussion comments are made:

Annual report comments against submission headings:

2.1 perimeter gas: 100% compliance for both methane and carbon dioxide is commended.

2.2 Surface emissions: monthly FID surveys again detected no emissions in 2017. This continues to reflect the benefits of the investments made on site in permanent and temporary capping undertaken.

2.3 In waste gas wells: There are no emission limits for in waste gas, but when oxygen levels are present above 5% then remedial action is taken, the results submitted illustrate how re-balancing has been undertaken where results have been over 5% and the result returned to below 5%.

2.4 Point source Emissions: There appears to be a typographical error in that engine emissions monitoring is believed to have been undertaken in March of 2017 not 2016.

The total gas volume for 2017 are:

LFG to generation: 4,703.364m³

LFG to flare: 210,619m³

Generated power: 4,703,000m³

(the predicted gas generation for 2014 according to the 2014 GRA was 10,950,000)

There has been an increase in the LFG to generation from the 2016 figures (2,579,000m³). Additional gas wells and pin wells have been constructed. The flare has also received more LFG compared to 2016.

There is 1 operational engine on site.

An updated GMP dated Feb 2018 has now been received and accepted by NRW.

3.0 Leachate levels and quality: The compliance at phase 1 is noted and as the site is closed the methanogenic process expected.

Phase 2 of the landfill is operational. The site has been progressively capped and utilises temp capping to manage leachate, as a result the volumes of leachate removed have continued to decrease this year. The quality analysis results are within the expected range as identified by the HRA 2003.

4.0: Groundwater level and quality: Groundwater quality monitoring assessments of schedule 6 notifications have been undertaken during the reporting year.

The HRA has been commented on. FCC are expected to finalise their response.

5.0 Surface water: The one surface water breach had been reported to NRW via Schedule 6 and assessed accordingly.

6.0 General summary and conclusions: The landfill continues to be well managed and operated to a high standard of environmental control.

7.0 Recommendations: acknowledged. Would include consideration of odour management review and completion of HRA work.

Performance data

In addition to the annual report, Pwllfawatkin also report on the site annual performance parameters as per condition 4.2.1, these were received on 26/1/18. Whilst the submission has letter references slightly mis aligned to that of the condition wording all information required has been submitted.

4.2.1.

(a) review of monitoring results

Full review provided in annual report as commented above.

Gas – Gas compliance remains very high with little room for improvement.

Leachate – Leachate compliance is currently 100%, no improvement possible.

(b) improvement targets recommendations included in annual report.

~~(b)~~ **c & d Energy & water Consumed**

Table S5.3 Performance Parameters

Parameter	Frequency of Assessment	Annual Total	Unit
Potable Water Use	Annually	2546	cubic meters
Energy Used (including for leachate treatment)	Annually	58783	MWh of electricity
Non Potable water use	Annually	0	cubic meters

(e) **e**

Table S5.2: Annual Production Treatment Pwllfawatkin	
Leachate	Cubic metres/year
Disposed of off site	23204.25
Disposed of to any onsite effluent treatment plant	0
Recirculated into the waste mass	0
Surface water and / or groundwater	Cubic metres/year
Disposed off of site	not recorded
Disposed of to any onsite effluent treatment plant	0
Landfill Gas	Normalised cubic metres/year
Combustion in flares	210,619
combustion in gas engines	4,703,364
Other methods of gas utilisation	0
Average methane content entering the landfill gas utilisation or treatment compound (based on the annual average of Table S3.10 monitoring)	48.2% methane v/v

(d) **g** Topo Survey 479A427 Drawing submitted.

(e) **h** Volumetric difference 107,006m³

(f) **i** Settlement behaviour.

Point ID	Height	Height	Ht Diff
SM1	186.226	186.228	0.002

SM2	180.714	180.739	0.025
SM3	177.291	177.259	-0.032
SM4	176.167	176.107	-0.060
SM5	173.182	173.143	-0.039
SM6	176.773	176.746	-0.027
SM7	187.590	187.557	-0.033
SM8	191.774	191.736	-0.038
SM10	198.339	198.338	-0.001
SM11	211.019	210.947	-0.072
SM12	207.534	207.450	-0.084
SM13	196.044	195.979	-0.065
SM14	186.065	186.036	-0.029
SM15	176.418	176.437	0.019
SM16	174.539	174.516	-0.023
SM17	187.623	187.543	-0.080
SM18	200.721	200.590	-0.131
SM19	210.733	210.619	-0.114
SM20	211.688	211.584	-0.104
SM21	206.173	206.088	-0.085

SM22	199.331	199.235	-0.096
SM24	185.075	185.040	-0.035
SM25	175.630	175.617	-0.013
SM26	197.698	197.687	-0.011
SM27	191.105	191.068	-0.037
SM28	185.332	185.286	-0.046
SM29	179.984	179.959	-0.025
SM30	172.539	172.527	-0.012
SM31	171.372	171.359	-0.013
SM32	173.381	173.364	-0.017
SM33	179.801	179.752	-0.049
SM34	184.017	183.997	-0.020

(g) j remaining void 1,062,629m3

(h) k A follow up email received 28/3/18 confirmed an error in the report related to response to condition k, Compliance testing is believed to relate to the compliance testing of waste acceptance. Other permit conditions cover the requirements of waste acceptance criteria. The site makes notifications of any non-compliances via schedule 6 notifications as required by other permit conditions. A waste acceptance auditing is undertaken, and the regulatory officer does not currently feel the need to review the full list of testing undertaken during the year. Should this change at any time it is understood that all compliance testing data is available on request.

The performance data and annual report illustrate the good management and continued compliance of Pwllfawatkyn landfill.

END

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033104**

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

Site	Pwllfawatkin Landfill Site EPR/BU8819IV	Permit Ref	BU8819IV
Operator/Permit holder	FCC Waste Services (UK) Limited	Date	27/03/2018

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.