

Compliance Assessment Report

Report ID:
CAR_NRW0033347

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					
Regime	Installations					
Date of assessment	17/04/2018	Time in	10:30	Out	14:30	
Assessment type	Audit					
Parts of the permit assessed	3.4.1, 2.3.1, 1.1.1,					
Lead officer's name	Thomas, Ffion					
Accompanied by						
Recipient's name/position	Richard Thomas/ Site Manager	Date issued	15/05/2018			

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
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
C2 - General Management - Management system and operating procedures	A	
F1 - Amenity - Odour	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 was completed by Ffion Thomas following the un-announced audit of Pwllfawarkin landfill undertaken on the 17th April 2018.

The audit focused on odour management and was in response to an increase in incidents of odour reported to NRW. This increase is only very slight and intermittent, to put into context 3 reports have been received this calendar year so far, with 4 having been received end of October 2017 and 1 in November 2017. Whilst it is recognised there has not been many reports the increase is against the more historic trends and therefore justified the need to review and audit further.

This odour audit included the assessment of operating procedures, an offsite odour investigation survey of the area surrounding the landfill and was followed by an un-announced visit to the operating landfill to inspect on site operations and infrastructure (which co-inside with installation of gas pin wells)

Agenda:

Review of operational procedures

Odour investigation audit.

Offsite inspection

On site visit/infrastructure development observations

Conclusion/actions

Operating procedures:

Gas Management Plan (GMP)

The sites updated Gas Management Plan was received 7/3/18 and assessed and accepted on 27/3/18. Within this plan references is made to the sites Odour management Plan under point 5.4.9 odour monitoring.

Odour Management Plan (OMP)

A request was made for a copy of the sites OMP, this was received on 8/1/18.

The sites odour management plan is dated 18th March 2014 and has been previously assessed by NRW and recorded under CAR form ref 5513 dated 19th March 2014. The assessment was undertaken by Neil Herbert, a copy of the comments is provided below for ease of reference:

CAR form ref 5513 section 2 details:

During 2013 FCC submitted a Landfill Gas Risk Assessment for the Pwllfawtkin Landfill at Pontardawe, in order to discharge a long standing Improvement Condition (1a). As part of this submission a separate Odour Management Plan (OMP) for the facility was included. On the 9th October 2013 Natural Resources Wales (NRW) provided comments on the ODP and FCC subsequently submitted an updated plan in March 2014 (Ref: Version 1, dated 18th March 2014). Following a review of this final submission, NRW is satisfied that the following document* can be accepted subject to the caveats outlined in this report:

***FCC document: "Pwllfawtkin Landfill – Odour Management Plan" Version 1, dated 18th March 2014**

The recommendation to approve this Odour Management Plan is based on the understanding that the plan contains what NRW consider to be appropriate measures in the light of information available to us at the current time.

The recommendation should not be relied upon to mean that the measures are considered to represent appropriate measures covering every eventuality through the life of the permit. Indeed, in light of the odour pollution potential from the site as operations develop and waste phasing changes, the recommendation for approval is based on the caveat that the plan (in conjunction with the landfill gas management at the facility) will be kept under constant review to ensure measures remain effective and the plan is revised at least annually, or sooner when there are changes to operations on site or if there are complaints.

As detailed in the above NRW approval of the OMP dated 18th March 2014 was based on constant review of the OMP. Whilst the Gas management plan has been updated and aspects reviewed via the sites annual reports, given the recent complaints received NRW request that a review of the 2014 OMP is undertaken.

Discussions held with the site manager Richard Thomas during this audit confirmed that a review of the OMP is underway, and an updated plan will be forwarded once finalised in response to the complaints received.

Follow up email discussion with the sites Environment manager on the 11/5/18 confirmed agreement with a submission timeframe.

ACTION FCC: submit reviewed and updated copy of OMP by 30th June 2018

Odour investigation audit

NRW operate an incident reporting hotline, members of the public can use this to report any environmental incidents. The internal WIRS system records the reports and sends the details to regulatory officers for assessment. The site is made aware of reports (complainant details redacted) so that site investigations can be undertaken and where required mitigation undertaken.

Over the last 6 months (winter) an increase of reports was noted with 8 reports being received.

1 report was substantiated but no permit breach identified as the site demonstrated that it was following site procedures and management systems to minimise impacts and therefore in compliance with the permit condition.

A summary of the WIRS reports are provided below

Notification Date and Time	Event ID	Status	Team	Type	Incident Type 2	Location
25/10/2017	1705578	Closed	SW Waste	Odour		Cwmgors
27/08/2016	1604978	Closed	SW Waste	Odour		Cwmgors
30/10/2017	1705685	Closed	SW Waste	Odour		Cwmgors
30/10/2017	1705681	Closed	SW Waste	Odour		Cwmgors
30/01/2018	1800556	Closed	SW Waste	Odour		Cwmgors
19/02/2018	1800896	Closed	SW Waste	Odour		Cwmgors
03/11/2017	1705751	Closed	SW Waste	Odour		Cwmgors
26/10/2017	1705606	Closed	SW Waste	Odour		Cwmgors
13/03/2018	1801367	Closed	SW Waste	Odour		Cwmgors

It must be highlighted that whilst this is a very small number of reports over a 6-month period, the increase did go against the trend and therefore instigated further review and assessment (leading to this audit)

In response to the reports FCC undertook to review their odour management with the sites manager and gas contractor, Infinis, senior technician. On the 2/11/17 an action plan was submitted.

Pwllfawatkin Odour Action Plan

Date: 31/10/17

Author: Adam Mugan, Senior LFG Technician, Infinis

We plan on installing 5 x horizontal wells in the current tipping cell in order to improve environmental control.

Each horizontal well will comprise of a 40m length of 110mm diameter perforated pipework, and will be connected to a control valve on the 250mm gas main via solid pipework.

Wells will be spaced evenly across the cell to ensure maximum coverage.

FCC to dig trenches 1m into waste to allow for installation.

Infinis to arrange butt-fusion of pipework and connections to gas main.

Provisional installation date – w/c 13th November 2017

The works of installing the horizontal wells was undertaken (under approved CQA and assessed under CAR form NRW ref 0032646.) The works of installing the horizontal gas wells improved the odour reports. The installation of this infrastructure was completed on 15th November 2017.

A reduction in odour complaints followed.

However further reports were received in Feb and March 2018. These were shared with the operators. By this time the operations on site had progressed and the sidewall fill was now at the second lift phase.

Whilst the working area was still being maintained to a small surface, FCC with it's gas contractors again identified the potential for further gas collection as detailed in an odour report response dated 15th March 2018.

As a result, further gas pin wells were installed on the western side of the sidewall cell. (the construction was inspected during the site visit as discussed below).

Offsite odour inspection.

An unannounced off-site inspection of odour was undertaken by Ffion Thomas on the 17th April 2018.

A summary of the findings is included in the report below. The odour investigation was completed following and in line with the understanding odour training guidance produced in house by Paul Gibson of NRW.

Odour Report form Pwllfawatkin Date 17/4/18

Time of test	11:15	11:28	11:44	11:58	12:09	13:40	~13:50	
Location of test e.g. street name etc.	Baran Rd bridge over upper Clydach. Travellers well junction, Rhyd y Fro SN 71235 05743	Track from Baran rd towards landfill. SN 69333 08323	Unnamed road opposite site entrance road off A474. SN 70946 09113	Turning circle of Golwg y Cwm off A474 SN 70337 10354	Water street car park, Gwuan Cae Gurwen. SN70216 11977	Water street car park, GCG SN70216 11977	Approach Llwynnant on A474. SN 70352 09824	
Weather conditions (dry, rain, fog, snow, etc.)	Persistent fine rain. Misty.	Persistently heavy driving fine rain. In clouds.	Persistent heavy fine rain. Below clouds.	Persistent heavy fine rain. Below clouds.	Persistent heavy fine rain.	Persistent fine rain	Fine rain	
Temperature (very warm, warm, mild, cold, or degrees if known)	Cold to mild.	Cold.	Cold to mild.	Mild.	mild	mild	Mild	
Wind Strength (none, light, steady, strong, gusts) use Beaufort scale if known	Light wind to move small branches.	Gusty strong	Gusty light	Gusty light, moving small branches	Light wind moving only small twigs on car park trees.	Light	light	
Wind direction (e.g. From NE)	South	SSW	SSW	South	South	South	South	
Odour Intensity (use intensity scale ref below)	0 no odour.*	0	0	0	4	0 no odour	2	
Duration (of	5 minutes	4 minutes	6 minutes	8 minutes	6 minutes	~5 minutes	1 minute	

test)							– drive by	
Constant or intermittent in this period or persistence	NA	NA	NA	NA	Constant.	NA	Constant in this drive by period	
What does it smell like?	*faint mud odour.	Na	Na	Na	Egg.	NA	Egg	
Receptor sensitivity (see below)	low	Low	Low	High	High	High	high	
Is the source evident?	NA	NA	Na	Na	Landfill located to south of site. Wind from south.	NA	Landfill located to south of site. Wind from south.	
Any other comments or observations?	Downwind of landfill. *Could smell mud. Ground muddy, river in spate, nearby building work with exposed earth bank, waste wood and plastic.	Downwind of landfill. No discernible odours, only my own hair as it was blown into face.	Opposite site upwind. No discernible odours. Wind blowing into face. Could see landfill activities at tipping face and waste being received.	Location in a bit of a dip as fields fall towards river. No discernible odours.	Walked from car park up street (shops located on the road) noted the odour lessend as approached railway line, vehicle fumes detected. Egg odour strong on return to car park. I reconginse the odour to be similar to that of landfill gas I have observed on sites in the past. Odour was strong to	Had left site driving to Ammanford. Spent time eating lunch. Returned 1hour and 20 minutes later. No odours noted in area.	Noted odour through car vents as drove south along A474 Heol y gors.	

					make me frown and react desire to leave area. I drove down water street to check no other sources of waste in immediate area. None found.			
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Intensity	4 Strong odour	Receptor sensitivity
0 No odour	5 Very strong odour	Low (e.g. footpath, road)
1 Very faint odour	6 Extremely strong odour	Medium (e.g. industrial or commercial workplaces)
2 Faint odour		High (e.g. housing, pub/hotel etc)
3 Distinct odour	Ref. German Standard VDI 3862, Part 14	

Sketch plan overleaf of where the tests were taken, the potential source(s)

On identifying an off-site odour impact an unannounced on site odour inspection was undertaken.

On site visit/infrastructure development observations

An onsite inspection was completed following the off-site observations on the 17th April 2018.

During this inspection infrastructure works were underway to install pin wells and gas infrastructure. On arrival the wells had been completed and works to seal the wells was underway.

The waste that had that day been dug up to install the wells was being moved to the tipping face and as procedures the face would be covered at the end of the working day.

Photographs of gas infrastructure installation & tipping face:





An odour on site was observed in the working area of the pin well installation which was like that observed off site.

In this area waste that had been dug out to install the wells was in the process of being replaced into the active tipping face.

The site was to undertake daily cover of the tipping face at the end of the working day as per procedure and plenty of cover material was available to undertake this work.

As the operator was undertaking work to mitigate odour through gas management infrastructure improvements and following site procedures for the burying of waste no non-compliances to the permit were scored.

Conclusion/Actions

During the visit the site manager confirmed that there was to be a further meeting with the gas contractors Infinis to discuss on-going and future gas management plans as the operational

phases of the side wall progressed.

NRW were invited to join that meeting (details of which will be covered under separate CAR due to the separate date of visit)

ACTION Summary:

ACTION FCC: submit reviewed and updated copy of OMP by 30th June 2018

EPR Compliance Assessment Report

Report ID:
CAR_NRW0033347

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	17/04/2018

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.