

Compliance Assessment Report

Report ID:
CAR_NRW0035214

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	27/03/2019 - 06/06/2019	Time in	N/A	Out	N/A	
Assessment type	Report/Data Review					
Parts of the permit assessed	2018 Annual report, Condition 4.2					
Lead officer's name	Thomas, Ffion					
Accompanied by						
Recipient's name/position	Richard Thomas/ Site manager	Date issued	06/06/2019			

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
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	
H2 - Resource Efficiency - Energy efficiency	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 has been completed following review of the Pwllfawatkin landfill site Annual Environmental Data review 1st January 2018- 31st December 2018.

The Annual report was received by email on the 27th March 2019 (following agreed submission date extension) The site also submitted performance data via email received on 31/1/19 and FID survey infrastructure plan submitted on 3/5/19

Both reports meet the reporting requirements of permit condition 4.2.1.

Report submission review and comments:

2.1 Perimeter gas: 100% compliance again this year is commended.

2.2. Surface emissions: No emissions detected in 2018. A FID infrastructure plan was also submitted in May 2019 showing the infrastructure of leachate and gas extraction.

2.3 In waste gas wells: There are no emission limits for in waste gas, but all wells are monitored monthly and when oxygen levels are above 5% remediation action is taken.

The report did not include discussion of the results presented in appendix B, however review of the appendix showed some wells with results over 5%, rebalance has been undertaken but for some wells on some occasions comments state "interference suction" this can occur as oxygen enters into the gas well due to the monitoring suction.

Please confirm if this interpretation of comments is correct and what action is taken to rebalance if required?

Example abstracted data below with interference suction comment.

Asset ID	Reading Taken C	CH4 (%)	CO2 (%)	O2 (%)	Comment
PWLW0061	05/01/2018 14:53	35.7	25.3	6.8	2. Rebalance
PWLW0061	06/02/2018 10:41	13.8	11.5	13.1	2. Rebalance
PWLW0061	07/03/2018 11:11	29.4	21.5	5.5	20 INTERFERENCE SUCTION
PWLW0061	13/04/2018 14:55	26.4	20.9	6.3	20 interference suction
PWLW0061	11/05/2018 12:41	25.2	20.2	6.9	20 interference suction
PWLW0061	04/06/2018 14:54	25.7	18.5	7.9	20 interference suction
PWLW0061	06/07/2018 14:23	13.5	10.5	12.1	20 interference suction
PWLW0061	06/08/2018 14:37	22.8	17.4	7.5	20 interference suction
PWLW0061	10/09/2018 09:55	20	18.9	7.2	20 interference suction
PWLW0061	08/10/2018 14:02	55.4	35.3	1.1	1. OK
PWLW0061	05/11/2018 09:13	63.3	37.9	0.1	1. OK
PWLW0061	03/12/2018 13:57	63.8	38	0.1	1. OK

2.4 Point Source Emissions: the total gas volumes for 2018 are;

LFG generation: 4,547,329m3

LFG to Flare: 200,819m3

(the predicted bulk gas generation for 2014 according to the 2014 GRA was 10,950,000 with 4,748,148 being generated- considering proposed site closure a review of the GRA would be recommended)

There has been a slight decline in gas generation compared to 2017 figures (4,703,364) the flare has also received less than 2017.

3.0 Leachate levels and quality: No breaches of leachate level were recorded in 2018. The extraction rates continue at reduced rates in 2018 partly due to a dryer summer but also the progressive capping and temp capping used at the site.

The phase 1 landfill continues to be displaying methanogenic characteristics. Phase 2 quality results are within the range identified in the 2003 HRA.

NRW/FCC are in discussion regarding the HRA review, this discussion is separate from the assessment of the 2018 annual report, however please ensure the 2019 report includes relevant discussion.

4.0 Groundwater Levels and quality: All groundwater quality breaches have been reported through the year and are commented under separate CAR connected to the schedule 5 submissions.

NRW/FCC are in discussion regarding the HRA review and BH11B revised limits, these discussion are

separate from the assessment of the 2018 annual report, however please ensure the 2019 report includes relevant discussion.

The emission limit at BH17B is 1.5mg/l the appendix highlights any results over 1mg/l for ease of spreadsheet formula formatting. The breaches at Bh17B were reported via schedule 5 submission and assessed under separate CAR.

5.0 Surface water: Data presented in appendix G has been reviewed and permit breaches were identified against the suspended solids emission limit. Checking submissions, a schedule 5 was submitted for the breach identified in January. These have been assessed under separate CAR. Please be careful of statement sin the annual report comments not reflecting the data.

6.0 General Summary and conclusions: The landfill does continue to operate at a high standard of environmental control considering the sector. This reflects the management of the site.

7.0 Recommendations: The proposed recommendations are supported.

Performance data

In addition to the annual report, Pwllfawatkin also report on the site annual performance parameters as per condition 4.2.1. This was received via email dated 31/1/19

4.2.1 a and b are presented in the annual report and discussed above.

Condition 4.2.1 c and d are presented together in table form:

Table S5.3 Performance Parameters			
Parameter	Frequency of Assessment	Annual Total	Unit
Potable Water Use	Annually	1842 estimated	cubic meters
Energy Used (including for leachate treatment)	Annually	6798.41	MWh of electricity
Non Potable water use	Annually	0	cubic meters

The estimated water used is lower than 2017 (2546) Energy used has increased from 2017. The reduction in potable water use is a good sign.

Condition 4.2.1 (e)

Table S5.2: Annual Production Treatment Pwllfawatkin	
Leachate	Cubic metres/year
Disposed of off site	20282.89
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	200,819
combustion in gas engines	4,547,329
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)	48.6% methane v/v

The disposal off site has reduced significantly to 2017 data. Combustion to flare is also lower but this is possibly a reflection of the overall reduction of gas as that combusted in engines was also lower to 2017 figures. The methane content is very slightly up on 2017.

Condition 4.2.1 (f) noted that there was no contamination or decontamination of the site during 2018.

Condition 4.2.1 (g) the topographical survey was received via email on 31/1/19

Condition 4.2.1 (h) the volumetric difference calculated was 165,6705m³ compared to 107,006m³ in 2017.

Condition 4.2.1 (i) data received in the submission showing the previous year's survey and settlement behaviour difference.

Condition 4.2.1 (j) the remaining void is calculated at 830,595

EPR Compliance Assessment Report

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Site	Pwllfawatkin Landfill Site EPR/BU8819IV	Permit Ref	BU8819IV
Operator/Permit holder	FCC Waste Services (UK) Limited	Date	27/03/2019

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.