

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

Site	Ffridd Rasmus Landfill Areas 1 and 3		Permit Ref	GP3330BY		
Operator/ Permit holder	Gwynedd Council					
Date	13/08/2013		Time in	13:45	Out	15:20
What parts of the permit were assessed	Various					
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge
Recipient's name/position	Steven Edwards					
Officer's name	Stuart Ross		Date issued	21/08/2013		

**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**

Permit Conditions and Compliance Summary	Condition(s) breached
a) Permitted activities	1. Specified by permit N
b) Infrastructure	1. Engineering for prevention & control of pollution N
	2. Closure & decommissioning N
	3. Site drainage engineering (clean & foul) A
	4. Containment of stored materials N
	5. Plant and equipment A
c) General management	1. Staff competency/ training N
	2. Management system & operating procedures N
	3. Materials acceptance N
	4. Storage handling, labelling, segregation N
d) Incident management	1. Site security N
	2. Accident, emergency & incident planning N
e) Emissions	1. Air N
	2. Land & Groundwater N
	3. Surface water 3
	4. Sewer N
	5. Waste N
f) Amenity	1. Odour A
	2. Noise N
	3. Dust/fibres/particulates A
	4. Pests, birds & scavengers N
	5. Deposits on road N
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment N
	2. Records of activity, site diary, journal & events N
	3. Maintenance records N
	4. Reporting & notification N
h) Resource efficiency	1. Efficient use of raw materials N
	2. Energy N

Directly applicable legislation

**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**

**Number of breaches recorded**

0

**Total compliance score**

(see section 5 for scoring scheme)

0

**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 completed within 14 days of an assessment.

This Compliance Assessment Report follows a site inspection on 13/08/13 and also a discussion of recently collected surface water quality monitoring data.

### 1. Surface Water Monitoring

#### a) SW1 (Area 1 Drainage)

Samples collected from SW1 (piped discharge) contained ammoniacal nitrogen at 3.27mg/l (16/07/13) and 5.94mg/l (12/08/13). Samples collected in May and June also contained a small concentration of ammoniacal nitrogen at 0.75mg/l and 1.34mg/l respectively.

The presence of ammoniacal nitrogen indicates that surface water is contaminated with organic matter. Causing polluting matter to enter a controlled water is an offence under section 85(1) of the Water Resources Act 1991. This is 'directly applicable' legislation and you are issued with a site warning. This does not affect your OPRA score but will be taken into consideration should contamination continue.

There are three potential sources in Area 1; the IVC operation, the landfill waste reception building and the site septic tank. Following our on site discussion it appears likely that the source of contamination is from waste in the landfill waste reception building. The concrete hard standing within this building has a slight gradient sloping out of the roller shutter doors towards the site yard where surface water drains are located. It is possible that spilt liquids / wet municipal waste may enter the drainage system. Waste may also be tracked out of the building and onto the yard by machinery.

Further measures are required to prevent the contamination of clean yard areas / surface water drains. This may include the collection (i.e. sealed drainage) of potentially polluting liquids from the transfer station internal hard standing and improved working practices such as more frequent yard cleaning. Please write to me by 6th September 2013 informing me of the measures you intend to take to address this issue along with appropriate timescales.

#### b) SW2 (Drainage Ditch)

The quarterly monitoring report for April - June 2013 states;

*'Samples collected from location SW2 during the latest quarter showed a continued increase in ammoniacal nitrogen and chloride concentrations with current (May) concentrations at 18.4mg/l and 337mg/l respectively. These concentrations are higher than the range measured previously. There are a number of possible explanations for increased concentrations at SW2 which are under investigation including storage of compost taken from the IVC maturation slab and muck spreading on adjacent agricultural land.'*

A further sample collected on 12/08/13 recorded 24.6 mg/l of ammoniacal nitrogen (COD result to follow). The sample point was reportedly dry in June and July.

The source of the contamination is not clear - I await the findings of your investigation. Please report your findings to Natural Resources Wales by 11th September 2013. If you identify any pollution from a third party please report it to me without delay and we will investigate.

### 2. Capping - Cell 4a

Cell 4a has now reached final profile and waste is now being tipped in cell 4b. Cell 4a is methanogenic and the recently installed gas wells have been connected to the LFG extraction system. However, connecting pipe work / well heads are not yet of the required specification for permanent infrastructure and some pipe work falls are poor. Gas extraction is limited given that the cell does not benefit from any substantial temporary capping

It is essential that this cell is permanently capped as soon as practicable, particularly to reduce fugitive LFG emissions and allow proper LFG extraction. Connecting pipe work can also then be laid with appropriate falls to avoid condensate traps.


Please inform me of your intentions with regards to capping cell 4a. Please do so by 6<sup>th</sup> September 2013.

### **3. Litter**

No off site litter was noted on adjacent farm land but some loose litter had accumulated on site, outside the landfill cells. A litter picker was on site collecting this material. Please ensure loose litter is minimised as far as practicable.

The litter fence has been extended from cell 2 along the length of cell 4 which provides an extra control to prevent off site litter.

Please ensure adequate cover is placed on waste to prevent litter becoming air borne.

	<b>EPR Compliance Assessment Report</b>	Report ID: GP3330BY/0187430
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Operator/ Permit	Gwynedd Council	Date	13/08/2013

<b>Section 3- Enforcement Response</b>		<b>Only one of the boxes below should be ticked</b>	
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.	X
We will now consider what enforcement action is appropriate and notify you, referencing this form.			

<b>Section 4- Action(s)</b>			
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.			
<b>Criteria Ref.</b>	<b>CCS Category</b>	<b>Action Required/Advised</b>	<b>Due Date</b>
See Section 1 above			
		Refer to details section	

## 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 <b>major</b> environmental effect	60
C2	A non-compliance which could have a <b>significant</b> environmental effect	31
C3	A non-compliance which could have a <b>minor</b> environmental effect	4
C4	A non-compliance which has <b>no</b> 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](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.

