

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	23/04/2015	Time in		Out	
What parts of the permit were assessed	Routine Quarterly and Annual Reporting				
Assessment	Report/data review	EPR Activity:	Installation: X	Waste Op:	Water Discharge:
Recipient's name/position	Steven Edwards				
Officer's name	Stuart Ross	Date issued	24/04/2015		

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
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)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
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	A	
	2. Land & Groundwater	O	
	3. Surface water	A	
	4. Sewer	NA	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	C3	3.6.1
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	C4	4.2.1
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

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, O = Ongoing non-compliance – not scored

Number of breaches recorded	2	Total compliance score (see section 5 for scoring scheme)	4.1
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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 normally completed within 14 days of an assessment.

This Compliance Assessment Report follows a review of routine monitoring data for the period July - December 2014 and annual returns.

1. Reporting of Monitoring Data & Returns

Quarterly reports for July - September and October - December 2014 were received late;

July to September (due October 2014) received 27/01/15
October to December (due January 2015) received 25/03/15.

Annual returns (2014) as required by permit condition 4.2.1 have not been received on time and must be submitted by 15/05/15 (unless otherwise agreed).

Late reporting is a breach of permit condition 4.2.1 & 4.2.2. This attracts a CCS score of 4 (a score for late quarterly reporting was awarded in CAR form ref GP330BY/023524, the score for late annual reporting is included in this report).

Late reporting has become unacceptably common and action must be taken to ensure reports are submitted to Natural Resources Wales in a timely manner. Inform Natural Resources Wales of the action you are taking to ensure reports are submitted on time by 15/05/15.

2. Monitoring Requirements

During this monitoring period a number of monitoring requirements have not been met;

- Monthly leachate quality samples (pH, Cl, EC & NH₄) not collected in August 2014 (temperature only) or November 2014. No explanation provided as to why samples were not collected.
- A sample was not collected from BH1 in September 2014 for monthly groundwater quality analysis
- Quarterly groundwater quality analysis not completed/provided for July to September.
- July - September cadmium was only sampled in wells BH19A, BH19B, BH20A, BH20B, BH21A & BH21B whereas the permit requires that it is sampled from all wells on a quarterly basis.
- Perimeter gas wells not monitored during December 2014 (required monthly)

No explanation for deviations included in the report. Failure to monitor in accordance with the permit requirements is a breach of permit condition 3.6.1 and attracts a consolidated CCS score of 3.

Monitoring must be completed in accordance with the permit requirements.

3. Leachate Heads

All leachate heads reported as <1.5m - compliant with permit.

4. Leachate Quality

Leachate quality samples collected from individual cells. No significant issues noted with sample data.

5. Perimeter Gas Monitoring

No trigger limits exceeded during the monitoring period.

6. Groundwater Quality

With the exceptions noted in section 2 above, monthly and quarterly groundwater monitoring was otherwise completed as required during this period.

Quarterly Part A & B notifications (as agreed with NRW) received for trigger level exceedances for NH₄ and/or Cl in down gradient monitoring wells BH19A, BH19B, BH19C, BH20A, BH21A and BH21B. Contamination of down gradient monitoring wells is due to leachate migration from Area 2 unlined landfill. Therefore, in line with previous correspondence, CCS scores will not be applied under this permit. Due to pending site closure, trigger levels for groundwater monitoring wells will be reviewed as part of the closure process. / permit variation. This issue will be discussed separately with Gwynedd Council.

7. Surface Water Quality

Visual oil and grease monitored at SW1 and SW3 monitored weekly - no oil and grease reported present.

July – Aug SW1 was dry throughout as was the pipe (rainfall dependant). In July ammoniacal nitrogen was detected at 6.4mg/l at SW2 and also SW3 in July and August at 3.7mg/l and 1.33mg/l respectively.

Sept – Dec Samples were collected from all sample points each month with the exception of SW1 (pipe) in December. Ammoniacal nitrogen was present at SW1 (max 11.6mg/l) SW1 (max 11mg/l), SW2 (max 6.52 and SW3 (max 3.85mg/l).

Gwynedd Council have previously taken steps to prevent potentially polluting liquids entering surface water drains that may have been the cause of elevated ammoniacal nitrogen concentrations at SW1 (pipe) and SW1. This included blocking a drain close to the IVC building and more recently the installation of an ACO drain in front of the waste transfer building.

During recent site inspections it appears that the ACO drain has been successful in collecting potentially polluting liquid from the transfer building. However, having reviewed the data for July – Dec 2014 it is possible that sufficient debris / liquids are still being tracked out of the building and onto the hardstanding by plant and waste delivery/collection lorries etc.


This issue should be reviewed and investigated to assess whether any further measures can be taken to prevent potentially polluting materials from entering the drains. You may consider collecting samples from catch pots on the yard adjacent to the transfer building to assess ammoniacal nitrogen concentrations and depending on the findings consider more frequent cleaning of the drainage system amongst other potential measures. Please inform Natural Resources Wales of your intentions by 15/05/15.

8. Flare Emissions and Trace Gas Monitoring

Sampling completed 18/02/15 - reports received.
Flare emissions compliant with the permitted limits (NO_x, CO & VOC).

9. Hydrogeological Risk Assessment

The HRA is due for review in 2015. Please inform NRW of your intentions as to when this is due to be submitted to NRW. Please do so by 15/05/15.

	EPR Compliance Assessment Report	Report ID: GP3330BY/0237349
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Operator/ Permit	Gwynedd Council	Date	23/04/2015

Section 3- Enforcement Response **Only one of the boxes below should be ticked**

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.	<input type="checkbox"/>
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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.	<input checked="" type="checkbox"/>
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We will now consider what enforcement action is appropriate and notify you, referencing this form.	<input type="checkbox"/>
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Section 4- Action(s)

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.

Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
G1	C3	Monitoring must be completed in accordance with the requirements of the permit.	15/05/15
G4	C4	Monitoring data must be reported in a timely manner as required by the permit. The outstanding annual returns must be submitted to NRW by 15/05/15 unless otherwise agreed.	15/05/15

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 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 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. 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.