

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

Site	Ffridd Rasmus Landfill Areas 1 & 3 EPR/GP3330BY		Permit Ref	GP3330BY		
Operator/ Permit holder	Gwynedd Council					
Date	31/12/2015		Time in	00:00	Out	00:01
What parts of the permit were assessed	Routine Monitoring Returns					
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	09/02/2016		

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	N	
	2. Land & Groundwater	A	
	3. Surface water	A	
	4. Sewer	N	
	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	A	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	C4	4.2.2
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	1	Total compliance score (see section 5 for scoring scheme)	0.1
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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.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

This report covers a review of routine monitoring data for Area 2.

The 3 quarterly reports for the period January – September 2015 were not received on time as required by the permit and in some cases were received several months late. Reports must be submitted on time – please refer to permit condition 4.2.2. At the time of writing the report for October – December 2015 is late.

Late reporting is a breach of permit condition 4.2.2 and attracts a non-compliance score of CCS4.

As discussed during a site meeting at Ffridd Rasmus in October 2015, it is recommended that Gwynedd Council review its sampling schedule to ensure that adequate time is allowed for sample collection, sample analysis, data review and reporting.

1. January – March 2015

a) Leachate Heads

Compliant (<1.5m head)

b) Groundwater Quality

Trigger levels were exceeded for chloride in BH19A, BH19B, and BH19C and for ammoniacal nitrogen in BH20A and BH20B. These exceedances continue to reflect variability associated with contaminant migration from the unlined landfill Area 2.

c) Surface Water Quality

SW1 and the ditch adjacent to SW1 continue to record chloride concentration peaks and ammoniacal nitrogen concentrations below detection limit. The chloride peaks may be associated with the use of road salt and the adjacent concrete hardstanding / road areas.

Concentrations at SW2 continue to show elevated peaks of chloride and ammoniacal nitrogen exceeding the baseline quality and concentrations at SW3 are within the range recorded previously. Possible explanations for contamination at SW2 have been put forward in the report (agricultural run off, matured compost and leachate from Area 2) but the exact cause is not clear.

If there is any indication of pollution due to agricultural runoff .e.g. slurry or manure entering the ditch then please inform NRW. As discussed with the site manager 22/01/16, it is Gwynedd Councils intention to spread the stockpile of matured compost on capped landfill areas when conditions allow.

d) Landfill Gas (Perimeter)

No trigger levels exceeded.

2. April – June 2015

a) Leachate Heads

Compliant (<1.5m head)

b) Groundwater Quality

Triggers exceeded for chloride in BH19A, BH19B, BH19C, BH20A and BH21A and for ammoniacal nitrogen in BH20A, BH20B and BH21A. These exceedances continue to reflect variability associated with contaminant migration from the unlined landfill Area 2.

c) Surface Water Quality

SW1 (pipe) and the adjacent ditch continue to record chloride concentrations consistent with previous data and ammoniacal nitrogen –concentrations below the detection limit except for an isolated peak. Concentrations at SW2 continue to show elevated peaks exceeding the baseline quality and concentrations at SW2 showed a small fall and remained within the range recorded previously.

d) Landfill Gas (Perimeter)

No trigger levels exceeded.

3. July-September 2015

a) Leachate Heads

Compliant (<1.5m head)

b) Groundwater Quality

Compliance limits were exceeded for chloride in BH19B, BH19C & BH20A and for ammoniacal nitrogen in BH20A & BH21A.

c) Surface Water Quality

Ammoniacal nitrogen concentrations increased (but remained below 1mg/l) at SW1, but chloride concentrations decreased. Locations SW2 and SW3 were dry during the monitoring period.

d) Landfill Gas (Perimeter)

No trigger levels exceeded.

4. Notifications

Notifications were provided as per the groundwater trigger level exceedances detailed in the sections above. As per the ongoing compliance position no non-compliance scores will be attributed due to the impact from Area 2. An application for definitive closure of Area 3 is currently being determined and trigger levels / HRA are being reviewed accordingly and may be subject to change. If closure is granted this position will be reviewed and future non-compliance scores may be awarded as appropriate.

	EPR Compliance Assessment Report	Report ID: GP3330BY/0255944
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Operator/ Permit	Gwynedd Council	Date	31/12/2015

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.	
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.	

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			
G4	C4	Refer details.	N/A

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.