



EPR Compliance Assessment Report

Report ID: PP3139GB/0188722

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

Site	Hafod Quarry Landfill			Permit Ref	PP3139GB		
Operator/ Permit holder	Cory Environmental (Central) Ltd						
Date	20/08/2013			Time in	09:30	Out	13:30
What parts of the permit were assessed	Compliance, site and developments.						
Assessment	Audit	EPR Activity:	Installation	X	Waste Op	Water Discharge	
Recipient's name/position	I Craven - Site Manager						
Officer's name	Ian Oakes, Rachel Twiss			Date issued		10/09/2013	

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

a) Permitted activities	1. Specified by permit	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	C3	2.9.1, S4.1
	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	C3	3.3.5, S4.5
	2. Land & Groundwater	C3	3.2.3, S4.4
	3. Surface water	C4	3.1.2, S4.3
	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	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	

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	4	Total compliance score (see section 5 for scoring scheme)	12.1
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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

OK FOR PUBLIC REGISTER	INITIALS	DATE
	<i>[Signature]</i>	10/10/13
COPIED TO PUBLIC REGISTER	<i>JB</i>	<i>EDM</i>

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.

1 - Compliance (Reference 202250)

CCS4 - Surface water emission point SW2 alkalinity 330 versus 323 mg/l on 23 July, and emission point SW1A ammonia 2 versus 1.6 mg/l on 16 April.

CCS3 - Groundwater monitoring borehole HA12B(B) chloride range 16 April to 6 August from 870 - 1200 versus 450 mg/l. Borehole 300+ m from the site on the slip road of the A483 and has had historically high chloride levels, which have been attributed to gritting in winter. Ammonia levels at <1 versus 2 mg/l, all other boreholes complaint.

CCS3 - The March to July routine monitoring of the perimeter gas wells indicate continuing exceedences for various gas wells 1-15 (predominantly southern perimeter wells) for methane or carbon dioxide or both as has been the case since at least 2008 albeit with significant reductions having been achieved. Levels for methane range typically 1 - 45 versus 1 % by volume and carbon dioxide typically 2 - 34 versus 1.5 % by volume. As the pressure in the wells is low the overall impact is not considered significant. The gas present is depending on individual wells considered to be from either landfill, mines or from natural sources. Further work to reduce is to be investigated.

CCS3 - Leachate levels in Cells 1 and 2 for the period 3 April to 30 July continued to exceed the 2 m limit by up to 10 m though attributed to perched leachate and foaming and not true values. Large quantities of extracted leachate would support that the site is drying. Monthly figures for March through July for leachate removal were: 2870, 2014, 2636, 1399 and 1230 m3. Cell 3 is considered to be largely dry. A new leachate extraction system was installed in Q3/4 2012 with an interceptor tank and additional pumps, which is significantly helping in the removal of leachate. Leachate was visible in Cell 3 intercellular bund. Cell 1 and 2 leachate monitoring chambers have shifted and are causing problems in extracting pumps and monitoring levels and will have to be re-drilled down to the 0.5 x 3 x 3 m dummy pads and replaced in (most likely) stainless steel.

2 - Site

I drove around the site perimeter and adjacent neighbourhoods and noticed a slight odour at the gas compound as well as some land spreading odour in general. I walked around the site and noticed odour at Cell 3 from the installation of pin wells (to back fill these as soon as possible). I discussed the seagull cull with the contractor on site (with hawk).

3 - Developments

A leachate vacuum tanker has just de-silted the sidewall risers and Cells 1 and 2 monitoring chambers are to be re-drilled as soon as is practicable (as above). 20 shallow sacrificial pin wells have been installed and were being connected at the time of the visit. Cory to look at installing additional wells on Cell 2 slope and Cell 3. The gas engine was operating at 800 Kw with Cory hoping to increase it to the 1000 Kw maximum. The seagull cull is on-going and likely to take the best part of a year for the 150 allowed. Cell 3 western side slope extension engineering CQA is in preparation. Cory to propose counterfort and horizontal drains using granite railway ballast and Protexia FC6 geotextile. Cory is investigating options to remove gravels (with screening buckets at 25, 50 and 75 mm) and substitute with clay to fortify the slope.

 Cyfoeth Naturiol Cymru Natural Resources Wales	EPR Compliance Assessment Report	Report ID: PP3139GB/0188722	
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Operator/ Permit	Cory Environmental (Central) Ltd	Date	20/08/2013

Section 3- Enforcement Response		Only one of the boxes below should be ticked	
<p>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.</p>			
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			
B1	C3	Re-drill and install new Cell 1 & 2 leachate monitoring wells.	1 Nov 2013
E1	C3	Ensure gas field is optimised to minimise migration off site.	Daily activity
E2	C3	No action specified	N/A
E3	C4	No action specified	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.