

Compliance Assessment Report

Report ID:
CAR_NRW0033172

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				
Regime	Installations				
Date of assessment	10/04/2018	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	4.2.1				
Lead officer's name	McClymont, James				
Accompanied by					
Recipient's name/position	Ian Craven/ Area Manager	Date issued	12/04/2018		

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	X	

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

Environmental Monitoring Review (January - December 2017)

We have reviewed the above report submitted with regard to permit condition 4.2.1. Please see our comments below.

Condition 4.2.1 requires that a report or reports on the performance of the activities over the previous year shall be submitted to NRW by 31 January each year. At the operators request, an extension to this deadline was agreed by NRW, to 31/03/2018. The report was received on 16/03/2018, therefore before the agreed deadline.

Site Activities

Drawing HAF179, provides the results of a topographical survey undertaken at the site. The drawing shows contour lines but no elevations.

Action 1: Provide NRW with a drawing showing contour lines and elevations, by 31/05/2018. Also provide NRW with a copy of drawing reference 2425/2/013 showing approved pre-settlement levels, by 31/05/2018.

Details regarding compliance testing during 2017 and void space have been received.

Condition 4.2.1 also requires the reporting of:

(h) the volumetric difference (reported in cubic metres) between the most recent topographical survey and the previous annual topographical survey i.e. the additional volume of the landfill void that is occupied by waste;

(i) an assessment of the settlement behaviour of the landfill body based on the difference between the most recent topographical survey and the previous annual topographical survey for the areas of the landfill which did not receive waste between the surveys.

The report does not appear to include the items above.

Action 2: Provide NRW with the information required by (h) and (i) above, by 31/05/2018.

Other Environmental Reporting

Potable water and energy usage have both decreased since 2016.

The volume of leachate disposed to off-site reduced considerably from 21,821 m³/yr in 2016 to 9,139 m³/yr in 2017.

The report outlines that leachate abstraction rates decreased from 60 m³/day in 2016 to 25 m³/day in 2017, which is likely to be a consequence of the extension of the cap in 2016, and the abstraction

of leachate from gas wells which has contributed to the removal of localised perched leachate.

Landfill gas consumption at the site has increased from a total of 4,720,900 m³/yr in 2016 to 5,232,397 m³/yr in 2017.

Perimeter Gas Monitoring

Perimeter gas permit limit exceedances have been scored in CARs for each quarter. It is noted in the report that the developing gas profiles along the southern boundary could indicate a contribution from landfill gas. It is noted that the maximum methane concentrations detected in GB12 on the south west boundary, and HA10 on the south east boundary are twice those detected in 2016.

Action 3: This apparent increasing trend in methane concentrations at these locations should be assessed during the review of quarterly data during 2018.

A permit variation application has been received by NRW which outlines proposed changes to perimeter gas well limits. Our Permitting team will be in contact regarding this application in due course.

Surface Emissions Survey

The report states that "discrete features, such as abstraction wells and collection pipework were also surveyed". The GPS route on drawing FID Surveys Compilation 2017 indicates that several gas wells were not surveyed.

Action 4: Ensure that, in future, all gas wells and all other items of in-waste infrastructure are surveyed as part of the FID walkover.

Table 4.6 Landfill gas from capped surfaces - monitoring requirements includes a footnote which states that "if a cap has previously been shown compliant and there have been no significant physical changes in the gas management during the year, a detailed walkover survey with an FID can be used to demonstrate that the surface emissions are under control. If this survey shows no change in the pattern of methane emission, it may be used as the annual survey. The values for flux and total methane emissions measured in the previous year may be reported and a fresh flux box survey is not necessary. If the zone remains stable, the results of a full walkover survey may be accepted as the site report for a period of four years before a further quantitative flux box survey is required".

Action 5: Confirm when the last quantitative flux box survey was undertaken at the site, by 31/05/2018.

Point Source Emissions to Air

Table S4.2 Point source emissions to air - emission limits and monitoring requirements requires that NO_x, CO, VOCs and NMVOCs are sampled annually at the landfill gas engines.

Engine emissions monitoring results were received by NRW on 19/03/2018.

Engines 1 & 2 were sampled on 18/05/2017, and all parameters remained below the permit limits for all parameters, when the measurement uncertainty is taken into account.

Trace Gas Sampling

Table S4.7 Landfill gas - other monitoring requirements requires that trace gases are sampled on an annual basis at a representative sample location.

Action 6: Confirm whether this sampling was undertaken during 2017, and provide a copy of the monitoring report to NRW, by 31/05/2018.

Leachate

Leachate levels generally remained close to or below the 2 m permitted limit in HAF MP1b and HAF MP2a during 2017.

Leachate levels in LC3, LC4, LMP4a and LMP4b were generally above the permitted limits, but have shown a decreasing trend during 2017, with leachate heads generally <4 m in December 2017.

Leachate level permit limit exceedances have been scored in CARs for each quarter.

Groundwater

Groundwater chemistry was within Permit limits, except for ammoniacal-N at HA11B(M). This was a single outlier of 12 mg/l, whilst in previous months ammoniacal-N was <0.015 mg/l and the succeeding months 0.11 mg/l and 0.15 mg/l. This breach was scored a CCS 4 in CAR_NRW0031940, as it is likely that there was a typographical error.

Surface Water

Permit limit exceedances were noted within the surface water chemistry during 2017. The recent permit variation application outlines proposed changes to surface water limits, based on the 2016 HRA review.

Amenity

Table S4.11 Particulate matter in ambient air requires that deposited dust is sampled on a monthly basis (between April - September) on the NW boundary and the SE boundary. This monitoring data has not been provided to NRW for 2017.

Action 7: Provide NRW with the particulate matter monitoring results for 2017, by 31/05/2018.

EPR Compliance Assessment Report

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Site	Hafod Quarry Landfill	Permit Ref	PP3139GB
Operator/Permit holder	Cory Environmental (Central) Ltd	Date	10/04/2018

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			
G4	X	See comments section	31/05/2018

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.