	EPR Compliance Assessment Report	Report ID: PP3139GB/0239443	
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	18/05/2015	Time in	Out
What parts of the permit were assessed	Q1 2015 Monitoring review, CQA Validation Report Cell 3 Upper Sidewall Extension and Leachate Management Plan v2.1		
Assessment	Report/data review	EPR Activity:	Installation: X Waste Op: Water Discharge:
Recipient's name/position	Ian Craven - Site Manager		
Officer's name	Ian Oakes	Date issued	19/05/2015

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	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	C3	C2.9.1, 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	C3.3.5, S4.5
	2. Land & Groundwater	C3	C3.2.3, S4.4
	3. Surface water	C4	C3.1.2, 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, O = Ongoing non-compliance – not scored

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

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.

1 - Compliance Q1 2015

a). CCS3 Engineering to prevent emissions C2.9.1, S4.1

Operator having problems accessing and monitoring leachate wells due to displacement in LC1 and LC2 (HAF102, v2 and v3). Replacement wells LMP1a and LMP2a gave 3.2 m and 3.1 m and 2.5 m and < 2 m (foam) respectively in January and March vs 2 m limit (LC3 compliant). Leachate monthly figures of 1938, 1401 and 1783 m³. Improvements subject to the Leachate Management Plan v2.1 submitted to NRW in April (see below).

b). CCS3 Emissions to air C3.3.5, S4.5

Various perimeter gas well exceedences January - March (HAF101, 104 and 105) with methane ranging 0 - 38 % vs 1% and / or carbon dioxide ranging 1 - 26 % vs 1.5%. Subject to the actions arising from NRW gas audits November 2014 and February 2015 (reference CAR PP3139GB/0236913 issued 8 April 15).

c). CCS3 Emissions to land and groundwater C3.2.3, S4.4

Groundwater borehole HA12B(B) chloride levels January - March (HAF100, 103 and 106) at 1300, 1300 and 1500 vs 450 mg/l. Borehole + 300 m away on the slip road of A483 has historically high chloride levels with ammonia at < 0.1 vs 2 mg/l. Further groundwater analysis to be carried out by the Operator to better quantify the potential source(s) of the elevated chloride levels by 30 June 2015. To be further reviewed as part of the next Hydrological Risk Assessment 2015 / 16.

d). CCS4 Emissions to surface water C3.1.2, S4.3

Surface water exceedence at SW2 (HAF107) in March of chloride 71 vs 67 mg/l possibly due to dust from clay excavation for capping or slight change in groundwater chemistry all other parameters in compliance.

2 - Cell 3 western upper side wall extension CQA Report

We have examined the report forwarded by Stratus Consulting on behalf of the Hafod Site Operator, Cory Environmental. The 2015 side slope lining works occupy an area adjacent to last year's sidewall construction, which directly overlies the groundwater seepage and collection system. Ground conditions for this year's works were considerably better and the approach used on previous phases were adopted again.


The validation report includes a written account of the works, an as-built survey together with cross-sections showing the liner thickness, the conformance test results and a concluding statement validating that the works have been undertaken in accordance with the approved CQA plan. We are satisfied that the report contains all of the required records and we agree that on the basis of the evidence provided, the works have been constructed in accordance with

approved CQA plan. However, there are three minor non-conformances and Stratus has correctly identified these and discussed each of them in turn in the text of the report. Whilst these are non-conformances to the properties or frequencies of test data, we agree with Stratus that these have no material influence on the performance of the lining system. We are content, therefore, to accept the CQA Validation Report in its current form.

3 - Leachate management plan v2.1

The leachate management plan is accepted by NRW, subject to the following (not exclusive):

- a). It is agreed that the leachate monitoring of LMP1a and LMP2a be reduced to monthly due to the necessary removal of the pumps and associated equipment to enable accurate measurement and a suitable demonstration that the leachate emission limit of 2 m can be consistently achieved in Cells 1 and 2. This monitoring regime is to remain in force until 30 December 2015, subject to review. LM3 monitoring is to remain weekly.
- b). Due to the collapse of Cell 3 sidewall riser SWR3 leachate extraction is to take place at monitoring point LMP3. Proposals for its replacement will be subject to Cell 4 construction CQA (summer 2015).
- c). The proposed 680 m³ leachate tank is subject to CQA approval.
- d). Implementation of a web based telemetric leachate control system for optimum pumping arrangements.
- e). Maximisation of permanent and temporary capping.

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Operator/ Permit	Cory Environmental (Central) Ltd	Date 18/05/2015

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.	<input type="checkbox"/>
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"/>
We will now consider what enforcement action is appropriate and notify you, referencing this form.	<input type="checkbox"/>

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	Improvements subject to the Leachate Management Plan v2.1 submitted to NRW in April 2015. Monthly monitoring of LMP1a and LMP2a shall to be implemented as soon as is practicable.	30/06/2015
E1	C3	Subject to the actions arising from NRW gas audits November 2014 and February 2015 (reference CAR PP3139GB/0236913 issued 8 April 15).	30/06/2015
E2	C3	Further groundwater analysis to be carried out by the Operator to better quantify the potential source(s) of the elevated chloride levels.	30/06/2015
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.