

Compliance Assessment Report

Report ID:
CAR_NRW0031940

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	28/07/2017	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	2.9.1, 3.1.2, 3.2.3, 3.3.5				
Lead officer's name	McClymont, James				
Accompanied by					
Recipient's name/position	Ian Craven/ NW Area Manager	Date issued	31/07/2017		

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
B1 - Infrastructure - Engineering for prevention and control of emissions	C3	2.9.1, S4.1
E1 - Emissions - Air	C3	3.3.5, S4.5
E2 - Emissions - Land and groundwater	C4	3.2.3, S4.4
E3 - Emissions - Surface water	C3	3.1.2, S4.3

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

Monitoring compliance Q2 (April - June) 2017

CCS 3 – Q2 Leachate exceedances (with reference to HAF 170, 173 & 175)

- Cell 1 (MP1b) compliant at 1.66, 1.67 and 0.92 m versus 2 m limit
- Cell 2 (MP2a) compliant at 1.30, 1.96 and 1.54 m versus 2 m limit
- Cell 3 (LC3) 4.70, 3.19, 4.46, 2.87, 2.57, 2.57, 3.54, 1.79 (compliant), 6.59, 5.28, 1.84 (compliant) & 1.83 (compliant) versus 2 m limit
- Cell 4 (LC4) 3.74, 4.31, 2.66, 3.36, 3.92, 3.75, 6.33, 3.56, 4.82, 3.14, 5.04 & 5.62 (MP4a) 5.45, 5.66, 6.57, 4.11, 3.87, 7.55, 7.74, 9.05, 7.68, 7.81 & 10.03 (MP4b) 7.90, 8.54, 8.30, 8.93, 9.73, 9.56, 9.29, 8.34, 9.29, 9.80, 8.76, 9.11 & 11.36 versus 2 m limit

The volume of leachate removed from site was 562 m³, 778 m³ and 572 m³.

The pump in LC3 was removed during this review period due to tipping operations and to raise the chamber, which resulted in increased leachate levels and limited access for dip readings. The pump was reinstated in June, leading to a reduction in leachate levels towards the end of the review period.

It is understood that the pump in LC4 had to be removed several times during April and May due to blocking of the filter, leading to elevated leachate levels. A new macerator pump was installed in LC4 on the 22nd of June. Leachate head levels in LC4, MP4a and MP4b five days later, on the 27th of June, were 5.62 m, 10.03 m and 11.36 m compared to 2 m limit.

CCS 3 – Q2 2017 various perimeter gas well exceedances (with reference to HAF 169, 172 & 176). Methane ranging 0 – 37.3 % versus 1 % limit and / or carbon dioxide ranging 1.6 – 26.9 % versus 1.5 % limit (subject to gas audits by NRW).

Action 1: It is understood that you are currently reviewing the landfill gas trigger limits, with a view to submitting a permit variation application. In the meantime, non-compliances will continue to be scored relative to existing limits and their frequency.

CCS 3 – Q2 2017 Emissions to surface water (with reference to HAF 171, 174 & 177). SW2 Alkalinity 420 versus 323 mg/l limit, Conductivity 1410 / 1340 / 1280 versus 1120 mg/l limit, Mg 33 versus 31.9 mg/l limit, K 13 versus 10 mg/l limit & Cl 77 versus 67 mg/l limit.

Action 2: Cory are advised to submit the permit variation related to the hydrogeological risk assessment before the end of August 2017. It is likely that this will be considered a minor technical change, unless it is submitted as part of a wider application which requires further assessment.

CCS 4 - Q2 2017 Emissions to groundwater (with reference to HAF 177). BH HA 11B(M) ammoniacal nitrogen 12 versus 4 mg/l limit.

Action 3: It is noted that you consider that the above breach may have been a laboratory error. This should be assessed following receipt of the next monthly sampling results.

Site Visit 22nd June 2017, main points

- The vacuum on the field had reduced from -105 mb during the gas audit on the 25th of May 2017 to -68 mb during this visit.
- Seven new pin wells had been installed in Cell 4, all of which were connected to the gas extractions system (it is understood that a total of 16 pin wells are to be installed in Cell 4, as well as a phased gas well installation programme comprising 18 new gas wells in Cell 4. We received a CQA plan regarding the new gas wells on the 31st of July 2017, which is currently under review).
- The working face on the Eastern edge of Cell 4 had been considerably reduced, and two compactors were now being used to push the waste to the deposit area.
- Cover across Cell 4 appeared to have been improved, and ambient surface emissions were reduced in the limited areas surveyed during this visit.
- LC3 and LC4 had been re-connected to the gas extraction system. Although considerably reduced, significant emissions were again detected at the base of both chambers using the Gazomat at 6000 ppm and 15 % respectively, and at the bases of LMP1 and LMP4 at 34 % and 7000 ppm respectively.

Action 4: Provide evidence of repairs to LC3, LC4, LMP1 and LMP4 to NRW by 31st of August 2017.

END

EPR Compliance Assessment Report

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Operator/Permit holder	Cory Environmental (Central) Ltd	Date	28/07/2017

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.

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.

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			
E2	C4	See comments section	31/08/2017
E3	C3	See comments section	31/08/2017
E1	C3	See comments section	31/08/2017
B1	C3	See comments section	31/08/2017

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.