



EPR Compliance Assessment Report

Report ID: GP3830BG/0186519

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

Site	Chirk Landfill Site	Permit Ref	GP3830BG
Operator/ Permit holder	FCC Waste Services (UK) Limited		
Date	31/07/2013	Time in	13:00 Out 15:15
What parts of the permit were assessed	Various		
Assessment	Site Inspection	EPR Activity	Installation X Waste Op Water Discharge
Recipient's name/position	Colin Shaw (Site Manager)		
Officer's name	Stuart Ross	Date issued	05/08/2013

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	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	A	
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	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
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

0

Total compliance score

(see section 5 for scoring scheme)

0

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 completed within 14 days of an assessment.

This Compliance Assessment Report covers an follow up inspection after the NRW site audit on 26th June 2013. This inspection aimed to track progress against a number of actions.

1. Leachate Outbreaks

During the original audit two separate leachate outbreaks were identified from permanently capped areas. Since the inspection leachate drains and pumped collection pots/sumps have been installed on the inside of the side wall / cap anchor trench to intercept perched leachate at the bottom of the flanks and pump it to storage. The work has been completed to a very high standard and the risk of a leachate outbreak from these areas appears to have been significantly reduced.

The collection pot on the SW flank has been connected to the LFG management system to control LFG emissions identified during the audit.

Although not verified it was reported by the site manager that procedures have been updated to include a weekly inspection of the waste mass perimeter/flanks to identify any potential leachate outbreaks.

Please ensure all collection sumps/pots are sealed with bentonite as soon as possible (LFG emissions were negligible at the time of inspection).

As previously discussed, please report the findings into your investigation into the cause of the leachate outbreaks and provide CQA details for the work undertaken. Please provide me with proposed timescales for the submission of this report.

2. Gas Well Installation

FCC intend to install >10 conventional LFG collection wells on the N / NE and SW flanks to improve gas collection and reduce fugitive emissions, particularly from the areas capped in 2011. Please submit your CQA plan as soon as possible and we will respond as quickly as we can to minimise any delay to well installation.

It is our intention to re-visit the site at the end of August / early September to re-assess gas collection efficiency and it would be ideal if all the proposed gas collection wells are installed and connected to the system.

During the initial abstraction / balancing of the new collection wells, can you please record any balancing data that may be beyond the normal monitoring requirements of the permit. We would like to view this information as part of our next visit.

3. Review of Gas Collection Well Coverage

As discussed, a significant amount of waste has now been deposited on the current tipping bench which has resulted in a number of gas collection wells being extended with plain casing through the waste mass. There may now be a significant thickness of waste that is not under the influence of gas collection wells which may give rise to fugitive emissions. Please can you review gas well coverage and assess the need for additional gas well installation.

Also - please take steps to drain down leachate in gas collection wells as identified by your recent dip survey.

Will inspect/discuss your review of gas well coverage and steps to drain down flooded wells during the next inspection.

4. Other Comments

The site was generally in good order.

Compared to previous visits the flanks of the landfill were relatively litter free and staff were collecting litter at the time of the inspection.

New gas collection pipe work on newly capped areas to the west of the landfill was well laid with good falls to knock out pots.



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Operator/ Permit	FCC Waste Services (UK) Limited	Date	31/07/2013

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.

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			

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.

