

	EPR Compliance Assessment Report	Report ID: GP3830BG/0251201			
This form will report compliance with your permit as determined by an NRW officer					
Site	Chirk Landfill Site EPR/GP3830BG		Permit Ref	GP3830BG	
Operator/ Permit holder	FCC Waste Services (UK) Limited				
Date	27/10/2015	Time in	09:30	Out	12:30
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				
Officer's name	Stuart Ross, Peter Stanley, Haf Peskett		Date issued	09/11/2015	

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	A			
	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	A			
	2. Land & Groundwater	N			
	3. Surface water	N			
	4. Sewer	N			
	5. Waste	N			
f) Amenity	1. Odour	A			
	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	A			
	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	0	Total compliance score (see section 5 for scoring scheme)	0
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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.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

2015 - Capping Works (Site Inspection)

During the visit, laid and welded LLDPE panels were observed along with areas of geo synthetic wick drainage/textile panels laid and leistered/heat bonded together. A small area of rolled regulatory layer, exposed anchor trench and some extrusion welding to the existing down gradient cap was also observed.

Discussing matters with the CQA Inspector, of Stratus, it was evident that he was well acquainted with the CQA Plan and in control of engineering activity.

It was noted that the rolls of Geofabrics, Protexia GPT and LLDPE stored on the top of the landfill both had slings around them. It is understood that on delivery rolls are received and unloaded in the Contractors yard, therefore being subsequently transported to the working area. The attachment of slings suggests that the LLDPE may have been transported without spreader bars or contrary to the manufactures guidance.

The areas of temporary storage were generally on soil that had been spread and smoothed, providing adequate protection. However, this led to the LLDPE becoming muddy and there may be some advantage in using some sacrificial synthetic off cuts on top of the soil. It is appreciated working in the Winter has its weather constraints, however please ensure the handling and storage is afforded due attention.

The small area of exposed and rolled regulating layer was in general smooth and revealed some litter that the CQA Inspector advised required picking. An exposed piece of bent metal wire was noted to be protruding and large stones were noted to be flat with the upper surface.

The anchor trench was mostly covered with the leading edge of the cap and in part it appeared quite angular. The CQA Inspector was asked to try and ensure that the outer upper edge of the anchor trench retained a rolled or chamfered profile as stones contained in the regulatory layer could cause undue stress on the LLDPE cap.

The cap had only recently been fusion welded. A walk over the cap on the upper crest and also along the lower edge of panels identified three anomalous stones (>25mm) above the rolled surface of the regulating layer, one on the top and two on the lower edge. The CQA Inspector highlighted these and sought that the Contractor remove them. The stones may have become loose when placing panels, so the CQA Inspector and lining Contractor were asked to be vigilant about such large and loose stones.

One patch on the lower seam of P30-P31 was a little messy, with one patch crossing a much smaller one. Whilst it is acknowledged this can be tested and shown to be effective, the lug of the earlier patch being some 3 ½" long may have been better removed. We will look for details of the testing on submission of the CQA Validation report.

Along the lower edge a number of landfill gas extraction wells were noted and the 2m top hat detail would extend into the previously capped area. It was asked if further excavation of restoration soils around these wells would occur and if a 2m top hat detail would be provided. The CQA Inspector was waiting on information from the Principal Designer (FCC). Please ensure the detail is included in the Validation Report.

The preparatory work of cleaning and sanding the LLDPE, followed by fusion welding to existing was observed to follow good practice.

An example LLDPE roll number recorded on the working area was checked against the CQA Inspector's daily logs, which showed an accurate record of events and checks of compliance.

Separately we have reviewed the Geofabrics Protexia GPT group datasheet and note the manufacturer provides the in plane water flow as 0.2 l/s/m width at 20 & 100kPa. For a GPT product on a restoration cap with surface water wick drains centred every linear meter width, this is suitable. The Designer may wish to qualify this in the

Verification Report as the CQA Plan in Table 6 seeks in plane flow; in both long and cross direction. The geotextile by itself is unlikely to achieve this specification for cross direction.

Some minor localised landfill gas odours were noted along the boundary of exposed anchor trenches but were not significant.

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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.