

	EPR Compliance Assessment Report	Report ID: GP3830BG/20160304			
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) Ltd				
Date	04/03/2016	Time in	09:30	Out	13:30
What parts of the permit were assessed	Landfill Gas Control				
Assessment	Audit	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	Colin Shaw				
Officer's name	Stuart Ross / Tony Roberts		Date issued	23/03/2016	

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	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	3	3.3.1
	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	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	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	1	Total compliance score (see section 5 for scoring scheme)	4
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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.

This Compliance Assessment Form summarises the findings of a routine landfill gas audit on 04/03/16.

The audit follows the completion of capping works (NE. flanks) in Autumn 2015. Landfill gas collection infrastructure disrupted by capping works has been returned to its normal state allowing for a representative survey of collection infrastructure and emissions.

The purpose of this visit was to assess LFG emissions / collection and control. Discrete features such as gas and leachate extraction wells were surveyed for methane emissions using a Gazomat. LFG composition within gas wells was also measured in a number of wells using a GA2000+.

The findings of the audit and associated actions are in attached documents ref;

1. Gazomat Survey Findings 04/03/16
2. GA2000 Survey Findings 04/03/16.

Additionally, perimeter gas wells BH8, G17, G16, G15, G14, G13, G12, G11 and G10 were monitored to verify routine returns – no trigger level exceedances recorded.

Permit Non – Compliance

Elevated fugitive emissions (CH₄) were recorded (well head base) at wells GW87 and CHIR116 at 45% and 43% respectively. Landfill gas odour was clearly notable down wind of these wells and a relatively steady ambient level of 20ppm was detected in this area. It was established that these wells had been disconnected from the collection system for approximately 1 week, reportedly to allow for more room on the active phase of the landfill for vehicle movements.

Additionally a fugitive CH₄ emission at CHIR43 was recorded at 54.8% at had reportedly been disconnected from the extraction system for several months.

Whilst it may be necessary to disconnect wells for a short period to allow for site works etc., wells should not be disconnected for prolonged periods. No connecting pipework was present in the vicinity of the wells to suggest that the wells were recently disconnected or about to be re-connected at the point of audit.

It is considered that appropriate measures have not been taken to prevent or minimise fugitive emissions (causing pollution) which is a breach of permit condition 3.3.1. Potential for minor environmental impact (CCS3).

During the audit the site manager / Infinis gas technician agreed to ensure the wells are reconnected the following week.

ACTION – Confirm that wells GW87, CHIR116 and CHIR43 have been reconnected within 7 days of receipt of this report. Avoid the disconnection of wells where it is likely that fugitive emissions will result or implement alternative measures (e.g. buried pipework / sacrificial wells).

N.B Further Audit Actions as detailed in the attached report are summarised as follows:

Perimeter Wells: Small laboratory style well bungs require replacement to ensure reliable gas tight seal. Expansion bungs require inspection and re-adjustment where appropriate to ensure effective seal.

Gas Compound: There is a discrepancy between the SCADA reading and the gas reading at the inlet. Please ensure the SCADA reading is re-calibrated to reflect the actual readings more accurately. Bulk H₂S is high, efforts should be made to ensure that the extraction system remains under negative pressure to reduce the risk of gas leaks with high H₂S levels

CHIR81: This well had very high positive pressure and off the scale H₂S. This could be a health and safety issue and some form of suction must be established on this well as soon as possible. Proposed de-commissioning must be carefully assessed as the level of positive pressure and high H₂S indicate it is capturing gas not captured by the re-drill. Please dip this well and check for blinding of perforations with leachate.

Canoflex: Please ensure Canoflex attachments (at well head or collection pipework) are regularly checked for air leaks.

CHIR4AR: Check this well for high perched leachate levels when not being pumped and consider options to control positive pressure.

LWM4B: Check the latest dip results for this well. Insert pump if required.

2AR2, CHIR39, LC1: Please re-connect all wells as soon as possible and once this has been achieved re-record flow and quality results and forward to NRW within 7 days of receipt of this report. Dip all wells to check for levels of available perforations in this part of the site.

CHIR43: This well should be re-connected to the extraction system immediately. The high H₂S levels should be considered a risk when such a well is under positive pressure. As such it is vital that such wells are kept under negative pressure at all times. If a well with high H₂S readings shows positive pressures then site staff and visitors should be made aware of this before they approach such wells. This will enable a dynamic risk assessment to be conducted at any particular time.

Check dips for wells with high emissions or positive pressure, including wells that crash quickly after exhibiting good gas quality.

Dip wells with high emissions around the base and ensure that a plan is submitted to reduce or eliminate these emissions. This may be de-watering or pin well installation if the gas is deemed to be arising from the upper layers of waste and not influenced by the well in question,

Unless otherwise specified by a specific action detailed in this report, please write to NRW by 08/04/16 to confirm that the above actions have been completed / submit information as required.

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Operator/ Permit	FCC Waste Services (UK) Ltd	Date 04/03/16

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			
B1	C3	Refer report details section.	Refer details

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.