



EPR Compliance Assessment Report

Report ID: GP3830BG/0216139

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	30/07/2014	Time in	10:00 Out 12:30
What parts of the permit were assessed	Landfill Gas Management & Control		
Assessment	Site Inspection	EPR Activity:	Installation X Waste Op Water Discharge
Recipient's name/position	Colin Shaw		
Officer's name	Stuart Ross, Tony Roberts	Date issued	04/08/2014

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	C3	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	N	
	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

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 inspection was completed to assess progress in addressing actions highlighted during the landfill gas audit on 17/06/14.

The inspection primarily focussed on assessing improvements made by FCC to reduce previously elevated LFG emissions on the NE / E flank of the landfill adjacent to the GUP and surface water lagoons.

During the inspection the GAZOMAT laser diode methane detector was used to assess emissions from capped / temporarily capped areas and discrete features such as landfill gas collection wells.

The survey identified the following issues;

Well/Sample ID	Gazomat Emission Reading (ppm. unless otherwise indicated)	Comments
Well 0069	7000ppm	Gazomat reading taken at the base of the well on the bentonite sealing. ACTION 1: Re seal and re-hydrate the bentonite around the base of the well.
Capped off gas well	2249ppm	Gas well capped at the surface emission from the seal. ACTION 2: Re-seal and re-hydrate the bentonite
Temporary capped area close to the capped off well	4546ppm	Gas is being emitted from the surface of the site approximately 2m from the capped off gas well. ACTION 3: Investigate further gas control measures and continue improvements in extraction efficiency in this area to reduce emissions.
Well CHIW 70 seal at base of well	69ppm	The pump in this well has stopped working despite regular system check that are now in place. Reduced emission from this well due to de-watering. ACTION 4: Repair pump

		and check seal on the well within 7 days
Well CHIW 0090	9600ppm	Emission from well seal at the base. ACTION 5: Reseal and hydrate the base of the well and check leachate levels.
Well CHIW 89	570,000ppm (57%)	Very high concentration of gas leaking from the bentonite seal at the base of the well. The concentration of methane in the emission leads to the conclusion that the extraction efficiency of the well is reduced and gas pressure may be building locally. ACTION 6: Check depth of perched leachate in the well and de-water as necessary. Re-seal the bentonite at the base of the well.
Well 0088	15,000ppm/1.5%	Emission from seal at the base of the well. ACTION 7: Seal and re-hydrate the bentonite at the base of the well.
Trench/Sunken section of ground carrying 250mm gas main. (close to GW 73)	4250ppm	Gas was detected coming through the temporary soil capping in this area indicating a lack of extraction capacity (or compromised infrastructure). ACTION 8: Check the gas extraction infrastructure in this area for high perched water levels and sealing. Once the infrastructure has been assessed, please provide NRW with a short report detailing the actions undertaken to alleviate this emission.
Well 73	600,000ppm/60%	Gas is being emitted at 60% from the well seal indicating a lack of extraction from this well. ACTION 9: Check the leachate levels in this well and insert a pump if necessary. This action should be concomitant to the improvement of the well seal. This well is essential to the improvement of gas extraction in this area and these actions should be urgently completed within

		7 days of the date of the audit.
Well CHIW 0100	3750ppm	The well was leaking gas through the bentonite seal which had dropped and dehydrated around the well casing. ACTION 10: Re-hydrate and re-seal the gas well seal.

Note. 10,000ppm = 1% v/v

Please complete the actions listed in the table.

Elevated LFG emissions have been identified on this capped area during several previous inspections and audits including 11/09/13, 17/12/13 & 17/06/14. Flux box surveys completed by FCC in 2012 and 2013 have found emissions in excess of the permitted limit.

FCC has taken positive steps to remove liquid from gas wells and generally improve the collection infrastructure. This appears to have resulted in improved gas flows in a number of wells. Landfill gas odour was generally isolated to the flank and no off site odour was noted on the site access road / adjacent B road.

However, due to the ongoing emissions (cumulative environmental impact) and issues identified during this visit we do not consider that appropriate measures are being taken to prevent and minimise emissions of landfill gas.

This is a breach of permit condition 3.3.1 and attracts a CCS score of 3.

A concerted effort is now required to further prevent and minimise emissions from this flank.

As discussed during the inspection, we now require a concise action plan to prevent and where that is not possible minimise emissions to within acceptable levels by 12/09/14. Please submit an action plan to NRW by 13/08/14 including but not limited to, the actions you will take/have taken to address the issues noted in the table above.

NB. If the action plan is agreed and further inspections are undertaken whilst the action plan is in place, NRW may suspend any potential CCS scores if permit breaches are identified. If the action plan is not met then any CCS scores will be applied and will affect your compliance rating.

The CCS score detailed above cannot be suspended.



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Site	Chirk Landfill Site	Permit	GP3830BG
Operator/ Permit	FCC Waste Services (UK) Limited	Date	30/07/2014

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.

X

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	Operator to submit action plan to NRW detailing actions to be taken to address issues identified during this inspection and to further prevent and minimise landfill gas emissions from the NE / E Flank of the landfill.	13/08/14

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.