

## Compliance Assessment Report

Report ID:  
CAR\_NRW0034818

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

|                              |  |             |            |     |     |
|------------------------------|--|-------------|------------|-----|-----|
| Site                         | Bryn Posteg Landfill   | Permit Ref  | BU77661C   |     |     |
| Operator/Permit holder       | Sundorne Products (Ilanidloes) Ltd                                 |             |            |     |     |
| Regime                       | Installations  |             |            |     |     |
| Date of assessment           | 14/03/2019   | Time in     | N/A        | Out | N/A |
| Assessment type              | Report/Data Review   |             |            |     |     |
| Parts of the permit assessed | 2.5.1  |             |            |     |     |
| Lead officer's name          | McClymont, James   |             |            |     |     |
| Accompanied by               |  |             |            |     |     |
| Recipient's name/position    | David Williams / Tony Webber//<br>Technical Manager / Site Manager | Date issued | 14/03/2019 |     |     |

### 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 | X            |                       |

**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 | 0 | Total compliance score<br>(see section 5 for scoring scheme) | 0 |
|-----------------------------|---|--|---|

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

### Construction Quality Assurance Plan - Gas and Leachate Intervention Trench - Phase 1 and Phase 2 (December 2018)

We have reviewed the above CQA Plan, received by e-mail on the 22<sup>nd</sup> of February 2019.

Please see our comments below:

- As this is an 'in-waste' trench, which is proposed to de-water this area, it is possible (even in aged waste) for this to produce levels of gas over and above background levels as water is initially removed. It is therefore essential that gas extraction/pressure monitoring is performed at the valve controlling extraction. This should be daily for the first few days and be reduced to once per week for a month, then normal gas balancing. This should include the affected perimeter wells so that any reduction in gas migration can be noted;
- The trench is in waste and the leachate draining through it will contain particulates, this means the trench may be prone to particulate and bio-fouling. This will be evidenced by the increase in perimeter migration and reduction in water draining to the sump with a corresponding increase in entrained water;
- The horizontal pipe-work is proposed to be SDR 17.6 - does this have the material strength to avoid deformity under the proposed loading? SDR 17.6 is usually used for wells and pipe-work at the surface or in the vertical plane;
- Is 90 mm pipe wide enough for this application? What is the slot/pore density?
- How can all arisings be used back in the trench if the excavation is to be filled with drainage stone?
- Where will the leachate from the new leachate sump be pumped to long term? The leachate infrastructure plan should be updated accordingly, and submitted to NRW within 1 month of works completion;
- In the event that the trench starts to fill up with liquid, NRW should be notified. The CQA plan should confirm that a suitably sized pump and connection pipework will be kept at the works location in preparation for such an event;
- The CQA plan should confirm when the bentonite seal will be installed, and when and by whom the system will be connected to the gas infrastructure. It is considered that these elements should be completed immediately following pipe-work installation;
- NRW should be informed immediately should there be any anticipated disruption, or unplanned disruption, to the gas extraction system during the period of the works, or if any site-derived odour is detected during routine perimeter checks;
- The gas management plan should be updated with details of the intervention trench, and a procedure for maintenance and monitoring, and be submitted to NRW within 1 month of trench installation.

**Action 1:** Review the above comments and provide a revised CQA Plan to address by 31.03.2019.

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## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0034818**

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

|                        |                                    |            |            |
|------------------------|------------------------------------|------------|------------|
| Site                   | Bryn Posteg Landfill               | Permit Ref | BU7766IC   |
| Operator/Permit holder | Sundorne Products (Ilanidloes) Ltd | Date       | 14/03/2019 |

### 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.

### 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 |              |                         |            |
| B1                  | X            | See comments section    | 31/03/2019 |

## 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](mailto: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.