

## Compliance Assessment Report CAR\_NRW0043445

**Permit being assessed:** GP3330BY.

**For:** Ffridd Rasmus Landfill, **held by:** Gwynedd Council

**At:** Ffridd Rasmus Landfill Site , Morfa Road , Harlech, Gwynedd, LL46 2UW.

**Type of assessment:** Site Inspection,

**Reason:** Other.

**On:** 09/02/2024 between 09:30 and 12:30.

**Parts of permit assessed:** 1. Management, 3 Emissions.

**NRW Lead Officer:** Anthony Roberts.

**Report sent to:** Haydn Jones, Compliance Manager, on 20/02/2024.

### 1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Management - General management	C3 Minor	1.1 General Management
IR3A - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
1	4

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

### 2. What action is required?

Criteria	Action needed	Complete by
IR1A	Issues with litter as detailed in the below actions	29/02/2024

Compliance criteria codes are listed in the 'Important information' section below.

### 3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

**At this time, we do not intend to take any further action.**

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

## 4. Details of our assessment

### FFRIDD RASUS

#### SITE MEETING – PERMIT VARIATION REVIEW AND INSPECTION

09 February 2024

#### General Management

**Closure Plan** – The site must be operated in accordance with the closure plan. Following departures of key staff, the operator should ensure all staff are familiar with the closure plan and the requirements are expedited accordingly.

**Action:** A copy of the closure plan and the site permit should be maintained at the site offices at all times.

**Litter** – The site continues to have litter issues and is therefore scored a CCS 3 on this occasion

**Action:** The margins between Area 1 and the boundary of Area 2 (the original dilute and disperse landfill) must be trimmed of brambles and all litter collected by the 29th February 2024

**Action:** The drainage ditches running parallel to Area 1 contain litter which must be cleared by the 29th February 2024

**Action:** A further general litter clearance of the whole site should be undertaken by the 29th February 2024 when a follow up inspection will take place to ensure compliance.

#### Fit and Proper Persons

The permit requires a fit and proper person with the correct COTC (Certificate of Technical Competence.) to be in control of operations at the site.

CIWM (WAMITAB) Operator Competence is a mandatory qualification for waste facility managers and others involved with the operational management of Permitted Waste Operations. These statutory awards are RQF Level 4 qualifications.

**NOTE: Every waste management or recycling facility must have an accredited professional working on site for at least 20% of the time.**

**Action:** Please clarify the status of COTC holders at the site or working for Gwynedd as the operator of the facility within 2 weeks of the date of this CAR form.

Failure of the technical competence provision is a breach of permit therefore this issue

should be clarified urgently.

### **Landfill Gas Extraction System Inspection 4/08/2023 Follow Up:**

The gas utilisation compound was inspected which included the replacement flare system. The flare was found to be in good working order with no evidence of flame downwash or soot deposits on the external part of the combustion chamber.

The following were issues which were raised during the previous inspection/CAR form inspection, ***but do not count as a non-compliance pending investigation and a re-inspection:***

1. The two valves either side of the knockout pot were not working. These are usually to detect drops in pressure indicating blockage. This should be investigated with the manufacturer to check on requirements for these valves and if they need to be operational. Please report any findings within 21 days of the date of this report.
2. The additional gas cylinder attached to the flare showed signs of some corrosion on the pipe fittings and should be investigated. This is not a non-compliance at this stage as the pipe appeared to be in working order. Please check corrosion and connection issues and report findings within 21 days of the date of this report.

***During the re-inspection of the flare train, it was noted that all required works had been completed and the flare was running normally.***

Leachate Balance and Water Ingress.

A record of leachate heads and volume of leachate removed for treatment over the past 2 years should be submitted to NRW by the 29th February

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

## Important information

### Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

### Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

### How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

**If your assessment result in Section 1 is suspended, what does this mean?**

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

**Full list of Industry compliance criteria** (used in section 1 and 2):

**1. Management**

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

**2. Operations**

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

**3. Emission and Monitoring**

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

**4. Information**

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

**Enforcement response**

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

### **Data protection notice**

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

### **Disclosure of information – this report will be available to view on-line**

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

### **What do I do if I disagree with the report or have a complaint?**

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk) for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at [ask@ombudsman.wales](mailto:ask@ombudsman.wales)

### **Welsh Language Standards**

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.