

Ffion Thomas
Natural Resources Wales

By email

12 November 2019

EPR/SP3298FT
Giants Grave Landfill Site (in Aftercare)

Addendum to the Hydrogeological Risk Assessment Review 2016

Dear Ffion

Further to your email of 7 August 2019 requesting clarification of our HRA Addendum submitted April 2019.

Before replying in detail to the points raised it may be useful to set out the context for the Addendum.

- The principle aim of the Addendum is to provide NRW with the information needed to determine IPC1.

IPC1 of Permit EPR/SP3298FT required the Operator to submit an HRA Review. In July 2016 NPTWM submitted an HRA Review (HRA2016) recommending:

- Revised Permit Monitoring Schedules
- Revised Permit Compliance Limits

In May 2017 NRW agreed the revised Permit Monitoring Schedules (ref email FT/MJ 11/05/17). However, at his time NRW did not agree the recommended revised Permit Compliance Limits.

In September 2017 NRW requested further information in respect of the recommended revised Permit Compliance Limits for leachate levels (CAR_NRW0032167). NRW did not required further information in respect of all other recommended revised Permit Compliance Limits. The requested further information ("discussion regarding leachate levels") was submitted in April 2019 as part of the Addendum to HRA2016. The Addendum also reiterated all other recommended revised Permit Compliance Limits.

Therefore whilst NRW have agreed some of the recommendations of HRA2016, agreement in terms of the recommended revised Permit Compliance Limit remains outstanding.

This matter is of particular concern, given the recent application of certain permit compliance limits at the site. In a series of 3 CARs NRW recorded breaches against compliance limits, some of which are recommended to be revised (leachate levels) and other which are recommended to be removed (Arsenic in groundwater). In addition, with regard to leachate levels, the application is a departure from the historic approach taken by NRW. The breaches have attracted a score for non-compliance and subsequently increased our permit subsistence fees for the site, both for the landfill site and more onerously for the gas engine.

Determination on the recommended revised Permit Compliance Limits would regularise the operation and the permit, and remove a degree of financial penalty to the Company.

I trust the clarification presented in this letter will now enable NRW to determine IPC1, and in particular agree our proposals for revised Permit Compliance Limits.

To this end, please find below my reply to your email dated 7 August 2019.

General

Firstly, addressing your query regarding HRA (and Addendum) and the Annual Report, and in particular:

“...if there is to be any changed values presented in the annual report”.

No. We are principally concerned with the Permit and the Permit Compliance Limits, I would be glad if NRW could consider the recommended revised Permit Compliance Limits set out in the Addendum.

Leachate Levels – Permit Compliance Limits

“See section 2.1.1 table 1 HRA addendum does not include all leachate wells e.g. what levels are proposed for LW9, LW18, 1301, 1303, 1304?”

I can confirm that we propose that Permit Compliance Limits apply to 6 number leachate wells only. Therefore, the Addendum does not include proposed compliance limits for all wells.

As stated in the Addendum: the number of leachate wells subject to compliance limits will remain the same as included in the current permit (6 no.). The leachate wells are at locations across the site with a bias toward more recently installed wells. This will give the best, representative view of the site.

For the avoidance of doubt: the current Permit (issued in 2015) includes compliance limits for six number leachate wells across the site. The Permit did not include any of the July 2013 installed wells. The site entered Aftercare in November 2013 (ref CAR05350 19/11/13).

Specifically:

The more recently installed LW1305 will replace LW9; both wells are in the centre of the site and in close proximity (ref Drawing NPTCBC – GG Environmental Monitoring Plan BHs and LWs Sept 2018 at Appendix A of the Addendum). We consider that LW1305 is representative of this part of the site.

The more recently installed LW1302 will replace LW18 at the South of the landfill. We consider that LW1302 is representative of this part of the site

Groundwater – Permit Compliance Limits

I can confirm that we propose to remove compliance limits in respect of Arsenic Mercury and Phenol.

Compliance limits will be in place for Ammoniacal Nitrogen. Ammoniacal Nitrogen is considered the most reliable marker of leachate in this environment and will continue to be monitored monthly, as agreed (ref NRW email MJ/FT 11/05/17 & HRA2016 Table 18).

For the avoidance of doubt: these parameters are, and will continue to be, part of monitoring regime at the site, as agreed (ref NRW email MJ/FT 11/05/17 & HRA2016 Table 18): Arsenic and Mercury 6 monthly and Hazardous Substances every 2 years.

Surface Water

As stated in your email: there are no Permit Compliance Limits for Surface Water.

I hope you find the above addresses the queries raise, and you now have sufficient information to complete your CAR. I look forward to hearing from you in due course.

As always, if you have any further queries, please don't hesitate to call.

Yours sincerely



Sian Davies
Company Secretary

