

Compliance Assessment Report CAR_NRW0045102

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: Routine.

On: 30/08/2024 between 09:00 and 17:00.

Parts of permit assessed: 1, Management. 2. Operations. 3. Emissions, .

NRW Lead Officer: Anthony Roberts.

Report sent to: Endaf Williams, Site Manager, on 02/09/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR2K - Installations - Operations - Landfill gas management (only applicable to landfill)	Assessed (A)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

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 LANDFILL SITE INSPECTION AND COMPLIANCE FOLLOW UP

30/08/24 @ 10:30hrs

This compliance visit focussed on the landfill gas monitoring regime external to the site, the operation of the flare and gas field and the maintenance of the gas field to ensure efficient gas extraction of the source term. Following issues raised in previous CAR forms regarding litter and general site management an inspection of the cleared areas and process in place was also undertaken.

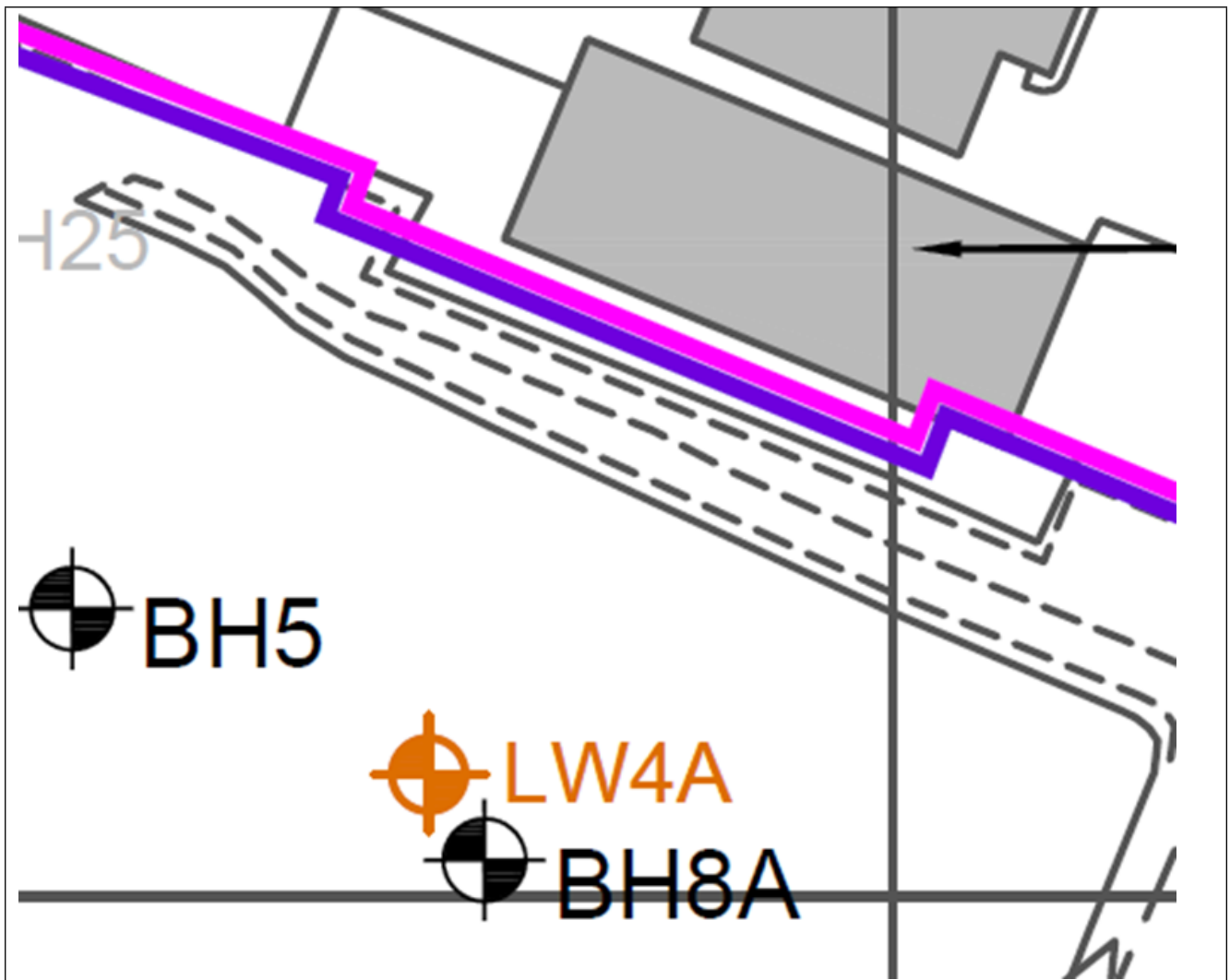
General Site Management/Litter

Areas of accumulated litter have now been cleared of deposits and the general state of the site is excellent and litter free. The clean-up is now considered complete. All efforts should now be made to maintain control of litter on an ongoing basis.

Perimeter Gas Monitoring Programme

The area between the IVC building and Area 2 GBH 5 and 8 is deemed to be the area that has the most potential risk as a gas migration pathway. See Figure 1 below:

Fig.1



Following discussions on site and to resolve any potential risk issues in this area the following actions are proposed:

1. Increase spiker bar surveys to once a week for a month starting in the third week of September.
2. Increase the number of sample points from three to five for this limited period.
3. Cease all non-critical spiker bar surveys on the rest of the site, where there are no receptors.
4. Monitor the in-waste gas wells BH5 and BH8 once per week for a month in line with the spiker bar surveys and review readings in these wells for the previous year's monitoring.
5. If the source term is absent or very low and wells are functional then provided no methane is detected in the spiker bar surveys, there will **not** be an immediate request to install new monitoring boreholes in this area.
6. Spiker bar surveys will then revert to the current regime for the area between the IVC building and the site and spiker bar monitoring over the rest of the site may permanently cease.

Gas Flare and Emissions

Following the AFS site report and internal audit of the flare and gas management system, the flare was visually inspected from outside the compound inspected for regular flow and evidence of poor emissions/Maintenance. There was no evidence of inefficient combustion and gas flow to the flare was steady. There was no evidence of unburnt carbon/soot on the combustion chamber. There was however evidence of scorching of the flare body indicating loss of thermal lining. This has been confirmed by AFS in its recent audit of the extraction system. This liner should be replaced to ensure efficient functioning of the flare as recommended by AFS. The AFS landfill gas extraction system audit is part of the management system requirements on site and should be forwarded to NRW for assessment and to expedite this requirement.

Sustainable Management of Natural Resources (SMNR)

The site now has global recognition with the other Wild Landfill sites and has significance for its innovation as a leading SMNR carbon and nature recovery site, helping to meet the council and NRW objectives under the Environment Act 2016 and the Wellbeing and Future Generations Act 2015. This includes carbon sequestration towards the councils net Zero Strategy and the section 6 biodiversity duty and the tree planting strategy for Welsh Government and the Cyngor Gwynedd. However, a programme of meadow management, cutting and collecting on the landfill surface along with strimming close to pipes and gas infrastructure should take place before the end of September. Kehoe Countryside have a Meadow Management Strategy for the site, and this should be followed to ensure continued improvement. The meadow species are developing and will eventually provide a local abundant wildflower meadow mix for harvesting and re-use across Gwynedd or for sale.

The acid grassland main field should be cut and hay collected to allow the abundance of Sheep's Bit Scabious and various other plants to flower the following spring

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 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

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.