

Compliance Assessment Report CAR_NRW0046083

Permit number	MP3330WP	Operator name	Resources Management U.K Limited
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Site name	Withyhedge Landfill
Site address	Withyhedge Landfill Bowlings House, Rudbaxton, Haverfordwest, Pembrokeshire, SA62 4DB.
Type of assessment	Site Inspection

Date of assessment	29/01/2025	Time in	09:45	Time out	13:15
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Parts of permit assessed	Site Inspection
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NRW Lead officer	Rhodri Morgan	Accompanied by	Erin Smyth Evans
Report sent to – Name and position	Phil Ridley – Director	Date	31/05/2025

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
IR1A General Management	Assessed (A)	1.1.1
IR2C Operating Techniques	Assessed (A)	2.3.1
IR2H Waste Acceptance	Assessed (A)	2.6.4
IR2K Landfill gas management	Assessed (A)	2.10.1
IR3C Odour	Assessed (A)	2.7.2

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

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

2. What action is required?

Compliance Criteria	Action needed	Complete by
	No actions specified	

Action 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 prosecutions 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

Resources Management (UK) Limited (RML) operates Withyhedge Landfill under the provisions of an EPR Permit (MP3330WP). The Site is a non-hazardous landfill and was constructed in two phases. Phase 1 accepted waste from 1985 until its closure in 2006. Phase 2 is where the current active tipping area is found at the Site.

Introduction

A pre-arranged site visit was undertaken on the 29th January 2025 to assess general compliance with permit conditions. Representatives from Pembrokeshire County Council's (PCC) Public Protection and Planning department and a local councillor were also in attendance.

NRW Officers were accompanied at times throughout the site visit by the RML Directors, Site Manager, Business & Development Associate (Dauson Group) and Technically Competent Manager (TCM).

Site Observations

Odour Assessment

Prior to the Site inspection, an odour assessment was undertaken by NRW officers at several points within the surrounding community; including locations within Prendergast, Poyston and Rudbaxton.

NRW Officers also responded to a complaint (2501167) which was received within the vicinity of Haverfordwest Golf Course.

No landfill gas or waste odours were detected. Agricultural odours were detected at all monitoring points. The findings of the odour assessment were shared with the Operator.

General

On arrival, RML provided the PPC representatives with an overview of the site's revised waste acceptance procedures. The Level 3 on-site verification process was discussed, with

RML describing the processes they follow to ensure wastes accepted are compliant with the site's environmental permit.

Recent offsite odour complaints along with RML's community engagement plans were discussed.

Operational Area (Cell 9)

NRW Officers observed several loads of waste being tipped directly into Cell 9 and subjected to Level 3 on-site verification by RML operatives. NRW officers completed an independent visual inspection of one of these waste loads; no evidence of any banned or prohibited wastes were observed in the wastes we inspected.

The waste loads being tipped directly into Cell 9 appeared to be a mixture of Bricks, Tiles, Ceramics and Stone. RML confirmed that the loads being tipped within Cell 9 had been classified as MRF Stone (19 12 09); this appeared consistent with the observations of the NRW Officers. The waste type can only be accepted at Withyhedge Landfill and not the adjacent Waste Transfer Station (QP3098FL).

RML operatives were observed obtaining a sample of the waste type as part of the Level 3 on-site verification process. This will then be sent for testing. This is consistent with the testing schedule listed within the waste acceptance procedures.

The access ramp into Cell 9 (Sub Cell A) has been completed. The remainder of the base of the cell is now being progressively filled with shredded waste to a height of 2m. This is in line with the waste phasing plan (see CAR_NRW0045933).

The material within Cell 9 appeared free from any wastes that could cause damage to the underlying cell drainage and lining systems. No evidence of any banned or prohibited wastes – including wood – were observed during the inspection¹.

A series of horizontal gas wells have been laid across the initial layer of waste. These have been designed to collect any gas from the drainage blanket and the lowermost layer of shredded waste. The installation of the horizontal gas wells appeared consistent with the CQA Plan (CAR_NRW0045814). The gas main associated with Cell 8 is to be extended to allow for the connection of the horizontal wells to the gas abstraction system.

A landfill gas check of methane emissions was undertaken by NRW officers at various points across Cell 9 (Sub Cell A) using a Gazomat methane detector. The results of the survey indicate minimal surface emissions of methane with a max reading of 5ppm. Higher methane readings were recovered around the leachate extraction well. RML were instructed to connect the well to the gas abstractions system as soon as practicable.

¹ Article 5(3) COUNCIL DIRECTIVE 1999/31/EC

No malodorous emissions were detected by any NRW officer at any location during the duration of the entire site inspection. No issues in respect of gulls or other scavenging birds were identified.

Noise Complaint (2501078)

A noise complaint which was received by NRW on the 26th January 2025 was discussed.

Previous discussions had concluded that a series of surface water pumps RML have been utilising towards the northern boundary of the landfill may have been a potential source. The pumps were running during the site visit with NRW officers concluding they were a credible source of the noise complaint.

These pumps are being utilised to transport water from the recently constructed surface water lagoons (Phase 2), to the existing surface water discharge point (D1). It is anticipated that this pumping configuration will not be required once the surface water discharge point associated with the new improved lagoons is brought into operation (D2).

RML were able to provide evidence that the pumps are being maintained as per the manufactures recommendations. They are only operational when required to maintain the water levels within the lagoon system.

As an interim measure the site manager has arranged for a series of quieter pumps to be delivered to the Site. These should be delivered and replace the existing pumps by the 07th February 2025.

Surface Water Management

The construction of the surface water lagoons associated with the D2 discharge point has been completed. The lagoons have been designed to reduce suspended solids and attenuate flows from surface water runoff across Phase 2 of the landfill.

The surface water within the lagoons appeared clear with no visual evidence of pollution noted. As discussed the water is currently being pumped to the D1 discharge point.

RML explained that the CQA Validation Report for the new lagoon system would shortly be submitted. The flow meter associated with the discharge point has been installed and was noted by NRW Officers. The flow meter is awaiting the installation of a sim card to allow the Operator to remotely monitor flows through the device.

RML should ensure that once operational any future emissions from discharge point (D2) are monitored in accordance with the EPR permit.

The current surface water emission point for the Site – D1 – was inspected; no visual evidence of pollution was noted.

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 in the aspects assessed.
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

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

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 – 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.