

Compliance Assessment Report CAR_NRW0046007

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	16/01/2025	Time in	11:30	Time out	14:30
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Parts of permit assessed	Site Inspection
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NRW Lead officer	Rhodri Morgan	Accompanied by	Elliot Jones
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
IR2K	Increase frequency of methane surveys surrounding leachate monitoring well of Cell 9 (Sub Cell A).	Immediately

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

An unannounced site visit was undertaken on the 16th January 2025 to assess general compliance with permit conditions. Whilst onsite we also undertook an inspection of the adjacent Waste Transfer Station (WTS) which is operated under a separate EPR Permit (QP3098FL).

NRW Officers were accompanied at times throughout the site inspection by the Technically Competent Manager (TCM) and Health and Safety Manager.

As the majority of the landfill's waste is initially accepted within the WTS, some elements of our compliance assessment have been documented in a separate CAR¹ (although general observations have been reproduced in this report for completeness).

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 Spittal, Poyston Cross and Rudbaxton.

No landfill gas or waste odours were detected. Agricultural odours were detected at several monitoring points.

The findings of the odour assessment were shared with the Operator.

¹ CAR_NRW0045995

Waste Transfer Station (WTS)

On arrival the Operator confirmed that sixteen loads of waste had been accepted that morning including fourteen loads of non-hazardous shredded general waste (19 12 12) and two loads of Qualifying Fines (19 12 12). These waste streams are listed on the EPR permit for the landfill and WTS (QP3098FL).

NRW Officers noted several samples awaiting collection within the site office. On inspection these were discovered to have been obtained as part of the Level 3 on-site verification process. The purpose of the sampling is to independently verify that the Level 1 Basic Characterisation and Level 2 Batch Testing results received from the waste producer.

The number of samples observed was consistent with the testing schedule listed within the waste acceptance procedures.

NRW Officers inspected a selection of the wastes within the WTS. No evidence of any banned or prohibited wastes were observed during the inspection. RML operatives were observed inspecting the wastes as part of the Level 3 on-site verification process.

A Gazomat methane detector was used to check several of the waste loads; no elevated readings were noted. No malodorous emissions were detected during the inspection of the WTS.

Operational Area (Cell 9)

The access ramp into Cell 9 (Sub Cell A) is nearing completion, having reached the northern edge of the cell. The remainder of the base of the cell will now be progressively filled with shredded waste to a height of 2m. This is in line with the waste phasing plan (CAR_NRW0045933).

The material being used to construct the access ramp 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 were observed during the inspection².

The intermediate cover layer has been extended to cover the entire flank of the access ramp. The material used appears to be formed of cohesive, impermeable soils which are suitable as intermediate cover.

RML confirmed that weekly methane surveys of the cell are being undertaken in line with the waste phasing plan. The results of these surveys indicate minimal surface emissions of methane with a max reading of 1.3ppm recorded on the 8th January 2025.

A landfill gas check of methane emissions was undertaken by NRW officers at various locations across Cell 9 (Sub Cell A) using a Gazomat methane detector. The results of the

² Article 5(3) COUNCIL DIRECTIVE 1999/31/EC

survey were largely consistent with the findings of the Operator, with the majority of methane readings <2ppm.

Higher methane readings were recorded around the leachate monitoring well and the adjacent eastern flank. Readings fluctuated in this area and were likely influenced by the movement of the waste compactor which was in operation close by. RML were instructed to monitor the area and apply additional cover material if the issue persists.

No malodourous emissions were detected during the inspection of Cell 9. No issues in respect of gulls or other scavenging birds were identified.

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.