

Compliance Assessment Report CAR_NRW0046001

Permit number	MP3330WP	Operator name	Resources Management U.K Limited
----------------------	----------	----------------------	----------------------------------

Site name	Withyhedge Landfill
Site address	Withyhedge Landfill Bowlings House, Rudbaxton, Haverfordwest, Pembrokeshire, SA62 4DB.
Type of assessment	Audit

Date of assessment	08/01/2025	Time in	09:30	Time out	11:30
---------------------------	------------	----------------	-------	-----------------	-------

Parts of permit assessed	Waste Acceptance
---------------------------------	------------------

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
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
IR2C IR2H	Operator to complete final section of Site Audit Form.	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

Waste disposal activities at Withyhedge Landfill recommenced on the 6th January 2025, following a review of waste acceptance procedures and various onsite improvements.

An unannounced site visit was undertaken by NRW officers on the 8th January 2025 to conduct a waste acceptance audit at the landfill. Whilst onsite we also undertook an inspection of the current Operational Area (Cell 9) and 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 Site Manager, Group Technical Manager (Dauson Group), 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).

Waste Acceptance Audit

Background

Revised waste acceptance procedures for waste disposal activities within Cell 9 were recently reviewed and accepted by NRW within CAR_NRW0045959. The revised waste acceptance procedures are now part of the permit; incorporated under Operating Techniques (Permit Condition 2.3.1).

¹ CAR_NRW0045995

The revised waste acceptance procedure (RML - Waste Acceptance [NSSL ARL Only] - v1.3) were used as a reference during the audit.

Audit Findings

Waste Acceptance

On arrival, NRW officers completed an independent visual inspection of the waste found deposited within the WTS's bays – for eventual disposal at the landfill. No evidence of any banned or prohibited wastes were observed in any of the wastes we inspected.

The wastes we observed within the WTS appeared to be shredded general waste, which is listed within the EPR Permit.

NRW Officers observed RML operatives inspecting the waste within the WTS. NRW Officers approached the RML operative and asked them to explain the Level 3 on-site verification process they are required to follow. During our discussion the RML operative provided a comprehensive description of the revised waste acceptance procedures.

The Site Manager confirmed that training had been provided to all operatives following the revision of the waste acceptance procedures. This training included the steps required as part of the Level 3 on-site verification process.

Following the removal of the existing waste from the WTS, we observed several loads being deposited at the WTS bays. NRW Officers observed one load (from vehicle registration CE21 FZW) being tipped onto the impermeable pad and subjected to Level 3 on-site verification by RML operatives. The load was confirmed by RML as being shredded general waste. No evidence of any banned or prohibited wastes were observed during the inspection of the load.

All wastes accepted on the 8th January 2025 were initially accepted under the WTS permit (QP3098FL) before being transferred to the landfill. Only shredded general non-hazardous waste was accepted onto the WTS and landfill during the site inspection.

Document Review

Following a visual inspection of some of the waste loads being accepted within the WTS, a meeting was held in the Site office. Several improvements to RML's document management system was discussed; including the greater input of RML site staff (with site-specific knowledge) into the drafting of key documents.

The training records of the RML operative we had earlier observed undertaking the Level 3 on-site verification check was requested. This was promptly provided. RML explained further training regarding waste acceptance documentation was scheduled for that afternoon.

The Group Technical Manager provided an extensive overview of the waste acceptance process. The Site Manager explained that the Site had started to accept a second waste stream; 19 12 12 Qualifying Fines (Warrior Fines). As part of the audit we then proceeded to inspect the following documents:

1. NSSL – Qualifying Fines – Basic Characterisation Form
2. NSSL – Qualifying Fines – Level 1 Basic Characterisation Report
3. NSSL – Qualifying Fines – Annual Duty of Care (DOC) Form
4. NSSL – Qualifying Fines – Site Audit Form

1. NSSL – Qualifying Fines – Basic Characterisation Form

The BC form appeared to contain the appropriate level of detail necessary to allow the waste to be accurately characterised. All of the relevant sections of the BC form inspected had also been completed by the waste producer. Section 4 of the BC form has also been completed by an RML representative, confirming approval of the waste stream for disposal at the landfill.

The waste is correctly described as "Non-Hazardous General Waste," however this description is broad, especially given that the 19 12 12 waste code encompasses various waste streams. To comply with the DoC requirements a more detailed description of the waste is required.

The document confirmed that a WM3 Assessment had been undertaken which is required for wastes classified as 19 12 12. The results of the WM3 Assessment were attached within a separate document – "Level 1 Basic Characterisation Report".

The description of the appearance of the waste – "Brown, Solid, Subsoils, Ceramics/Tiles, Brick Fragments. Nil Odour" – is consistent with the NRW Officers observations made that day.

2. NSSL – Qualifying Fines – Level 1 Basic Characterisation Report

This document acted as the WM3 Assessment for the waste stream – 19 12 12 Qualifying Fines (Warrior Fines) – which had been prepared by the waste producer. While a full review of the 754 page document was not undertaken, the methodology of the document appears appropriate.

The sample results and subsequent HazWasteOnline (HWOL) Reviews contained within the report identifies the waste as non-hazardous and suitable for disposal at Withyhedge Landfill.

3. NSSL – Qualifying Fines – Annual DOC Form

A copy of the duty of care note used by the carrier to deliver this waste stream was inspected.

No discrepancies within the document inspected were noted.

4. NSSL – Qualifying Fines – Site Audit Form

The Operator has completed an audit of the waste producer's (Neal Soil Suppliers Ltd) site; in line with their approved waste acceptance procedures. The document has a focus on non-conforming waste items (including Gypsum containing wastes) and the ability of the waste producer to segregate these waste streams.

While the relevant information is included, the final sign off section requires completion.

Whilst this audit has only examined in detail one waste type – 19 12 12 Qualifying Fines (Warrior Fines) – the Operator is reminded that they must ensure that all wastes accepted at the facility conform to the required waste acceptance procedures. Waste that does not must be rejected.

Site Observations

Operational Area (Cell 9)

The Operator is continuing to construct the access ramp into Cell 9 (Sub Cell A); in line with the waste phasing plan (CAR_NRW0045933). This material 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 inspection².

A suitable intermediate cover layer has been applied to the flanks of the access ramp. This material appeared to be a mixture of soils and stone, with the Operator confirming it to be 19 12 12 Qualifying Fines (Warrior Fines). The Site manager explained further cover material was scheduled to arrive later in the day and would be applied to the operational area as daily cover.

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

Odour Assessment

No malodorous emissions were detected by the NRW officers at any location during the duration of the entire site inspection; either in the WTS or at the landfill.

Following 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 odours were detected. Agricultural odours were noted at several monitoring points.

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.