

Compliance Assessment Report CAR_NRW0046115

Permit being assessed: MP3330WP.

For: Withyhedge Landfill, **held by:** Resources Management U.K Limited

At: Withyhedge Landfill Bowlings House , Rudbaxton, Haverfordwest, Pembrokeshire, SA62 4DB.

Type of assessment: Site Inspection,

Reason: Routine.

On: 13/01/2025 between 12:06 and 13:33.

Parts of permit assessed: See CAR summary.

NRW Lead Officer: Elliot Jones, accompanied by Benjamin Taylor.

Report sent to: Phil Ridley , Director , on 03/02/2025.

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)	
IR2C - Installations - Operations - Operating techniques	Assessed (A)	
IR2H - Installations - Operations - Waste acceptance (only applicable to landfill)	Assessed (A)	
IR3C - Installations - Emissions and monitoring - Odour	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

Withyhedge Landfill

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 the current operational area. Operator recently recommenced waste disposal activities on the 6th January 2025.

Introduction

An unannounced site inspection of the landfill (MP3330WP) was performed by NRW officers on the 13th January 2025.

Inspection included observation of the following:

- Waste disposed in the current operational area, Cell 9A.
- Gas Utilisation Plant (GUP)
- Incoming waste at the Waste Transfer Station (WTS) operating under environmental permit QP3098FL.

Odour Assessment

NRW officer undertook an odour assessment prior to attending the landfill site. Assessment was undertaken at locations within the local community, including locations within Spittal, Crundale, Poyston and Treffgarne. The weather conditions were dry, overcast, temperature 9°C, with a steady breeze from the South.

No landfill associated odours were detected offsite during the assessment. Officers did detect agricultural odours in Poyston and at Spittal Cross junction.

Site Observations

During officer's initial walk around site, no trucks had delivered waste to the WTS and therefore no tipping was observed at the landfill.

Despite this previously deposited waste in Cell 9A was inspected. Waste progressing down the length of the cell, towards 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)

Deposited material was free from waste with potential to cause harm to the cells engineered layers or drainage system. There was no evidence of any banned or prohibited waste types in the waste mass.

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.

Heavy plant being utilised to compact and shape the waste to the desired height.

Whilst inspecting the disposed waste, officers detected a mild waste like odour. Officers did not perceive this order to be offensive. Officers noted the absence of pests on the landfill during the visit.

Gas Management System

During the inspection all the gas produced by the field was being managed by the sites two large gas engines. Sulphide concentrations in the field has reduced significantly over previous months, gas composition is suitable for combustion in the engines and therefore no flaring of the gas is required.

Site has received delivery of a new Leachate storage tank. Leachate tank to be installed in coming months, replacing a redundant tank.

Waste Transfer Station Observations

Having walked around the landfill, officers' arrival back to the WTS coincided with the arrival of multiple waste deliveries.

NRW Officers observed a number of vehicles (5 Atlantic Recycling and 2 Neals Soils Trucks) being unloaded within the WTS and being subjected to Level 3* Testing (On-site Verification). On each occasion the vehicle was witnessed proceeding over the weighbridge with the driver exiting the vehicle and entering the weighbridge office with appropriate documentation.

The wastes deposited at WTS by Atlantic Recycling trucks was shredded general waste (19 12 12). Waste deposited at the WTS by the Neals Soils trucks was 19 12 12 Qualifying fines. These waste streams are listed on the EPR permit for the WTS and landfill (MP3330WP)

NRW officers witnessed the Technically Competent Manager (TCM) and plant operator inspecting each of the loads as part of the Level 3 Testing (On-site Verification)

Having observed the waste loads being subject to level 3 testing, waste was observed being loaded into several trailers for onward travel to the landfill for disposal.

All wastes accepted on the 13th January 2025 were initially accepted under the WTS permit (QP3098FL) before being deposited within the landfill.

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.