

Compliance Assessment Report CAR_NRW0046562

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	21/02/2025	Time in	13:00	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	Erin Smyth Evans
Report sent to – Name and position	Phil Ridley – Director	Date	10/03/2025

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
IR3A Emissions to water, air or land	Assessed (A)	3.1.1

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.

No non-compliances were recorded during this assessment

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 site visit was undertaken on the 21st February 2025 to assess general compliance with permit conditions.

NRW Officers were accompanied at times throughout the site visit by the Technically Competent Manager (TCM) and Site Foreman.

Site Observations

Waste Transfer Station (WTS)

On arrival, NRW officers completed an independent visual inspection of the waste already 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. The Operator confirmed the wastes were non-hazardous shredded general waste (19 12 12) which is listed on the EPR permit for the landfill and WTS (QP3098FL).

A Gazomat methane detector was used to check the waste found deposited within the WTS's bays; no elevated readings were noted.

Operational Area (Cell 9)

Waste disposal activities within Sub Cell A have reached a height of approximately 6m. In line with the waste phasing plan (CAR_NRW0045933), waste disposal activities have now commenced in Sub Cell B.

The intermediate cover layer has been extended to cover the majority of Sub Cell A. The material used appears to be formed of cohesive, impermeable soils which appear suitable as intermediate cover.

The gas main associated with Cell 8 has been extended along the Cell 8/Cell 9 intercell bund to allow for the horizontal gas wells within Cell 9 to be connected to the gas abstraction system. The waste within Cell 9 (Sub Cell A) is not currently generating sufficient quantities of landfill gas to be collected, however the infrastructure is in place to provide abstraction when required.

The operator confirmed that the site's gas technician is regularly monitoring the gas wells. The operator is reminded that when the gas wells are turned on, gas suction must only be applied very carefully and gradually.

No evidence of any banned or prohibited wastes were observed during the inspection¹.

A landfill gas check of methane emissions was undertaken by NRW officers at various points across Cell 9 (Sub Cell A & Sub Cell B) using a Gazomat methane detector. The results of the survey indicate minimal surface emissions of methane.

NRW Officers confirmed that the leachate well associated with Sub Cell B had been connected to the leachate extraction system.

Odour Assessment

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

Surface Water Management

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.

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

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.