

Compliance Assessment Report for: CAR_NRW0046764

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	25/03/2025	Time in	10:45	Time out	13:20
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Parts of permit assessed	Site Inspection
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NRW Lead officer	Elliot Jones	Accompanied by	Ben Taylor
Report sent to – Name and position	Phil Ridley – Director	Date	01/04/2025

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
IR1A - Management - General management	Assessed or assessed in part, no evidence of non-compliance found. Action Only (X)	
IR2H – Operations - Waste acceptance (only applicable to landfill)	Assessed or assessed in part (A)	
IR3A(1) - Emission & Monitoring - Emissions to water	Assessed or assessed in part, no evidence of non-compliance found. Action Only (X)	
IR3C - Emission and Monitoring - Odour	Assessed or assessed in part (A)	

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

Total number of non-compliances recorded
0

2. What action is required?

Compliance Criteria	Action needed	Complete by
IR1A - Management - General management	Improve on-site litter collection and remove the litter collected in surface water ditches.	Immediately
IR3A(1) - Emission & Monitoring - Emissions to water	Implement immediate measures to ensure that contaminated runoff is not permitted to enter either groundwater or the site's surface water management system	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.

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

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.

Introduction

An unannounced site inspection of the landfill (MP3330WP) was performed by NRW officers on the 25th March 2025 to assess general compliance with permit conditions.

Odour Assessment

NRW officers 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 condition during the assessment was overcast, temperature 11°C, with a light wind emanating from the Northwest.

No landfill associated odours were detected offsite during the 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.

Waste Transfer Station

During the site visit all waste delivered was initially accepted at the waste transfer station (WTS) (QP3098FL) prior to being deposited on the landfill (MP3330WP). Officers observed deliveries of 19 12 12 general waste and 19 12 12 qualifying fines. Both waste streams are listed on the EPR permit for the WTS and landfill.

Officers visually assessed incoming waste loads and previously deposited waste at the WTS. There was no evidence of any banned or prohibited waste types in any of the waste loads which were inspected. Whilst inspecting the deposited wastes within the WTS, a slight waste odour was detected, however this quickly dissipated.

Operational Area Cell 9

The current active area is within Cell 9 sub-cell A and sub-cell B.

A series of horizontal gas extraction wells have been previously installed and six of these are now operational. The Site confirmed that the wells are being monitored regularly and are presently under a slight negative pressure. A small number of horizontal wells have been installed in the second waste lift.

During this visit all gas currently collected from the site and delivered to the gas compound was being used to generate electricity at the site's two landfill gas engines. The flares were in standby mode

Temporary capping has been installed on both the east and north flanks of Cell 9. Currently surface water runoff from Cell 7 and Cell 8 collects in the valley separating the cells from Cell 9. This water is pumped into the surface water system. Currently there is minimal stand-off between uncapped waste and this perimeter ditch, now the temporary capping has been installed. There was no evidence of any leachate runoff having occurred during our inspection, although the operator must be mindful of the potential run off, during the next spell of inclement weather.

Action: Implement immediate measures to ensure that contaminated runoff is not permitted to enter either groundwater or the site's surface water management system.

Whilst inspecting Cell 9, officers detected a mild waste odour, however this quickly dispersed.

During the visit Officers investigated the presence of Hydrogen Sulphide (H₂S) emissions on site, using a JEROME Hydrogen Sulphide analyser. Samples were retrieved at the WTS,

Cell 9 active tipping area and the gas compound. During the survey, the analyser did not detect any H₂S emissions in the sampled areas.

General Site Observations

The Operator has submitted the Construction Quality Assurance (CQA) Validation report for Cell 9C. Waste disposal activities within Cell 9C cannot commence until NRW has confirmed that it is satisfied with the CQA Validation Report.

Preparatory works for the construction of Cell 10 has commenced. Heavy plant are being utilised to prepare the footprint of the cell. NRW are currently reviewing the CQA Plans which have been submitted by the Operator.

During the site inspection, officers noted that wind-blown litter had started to accumulate within the surface water ditches running adjacent to Cell 5 & Cell 6.

Action: Improve on-site litter collection and remove the litter collected in surface water ditches.

END

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 and Landfill 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 (1) - Emissions to water
- IR3A (2) - Emissions to air
- IR3A (3) - Emissions to 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.