



**WITHYHEDGE LANDFILL
PERMIT. EPR MP3330WP**

**Waste Recovery Plan for
use of soil in restoration
and engineering**

Report Number 2528r1v1d0325

Commissioned by
Resources Management UK Ltd
Withyhedge Landfill
Rudbaxton
Haverfordwest
SA62 4DB

Prepared by
Geotechnology Ltd
Ty Coed
Cefn-yr-Allt
Aberdulais
SA10 8HE

March 2025

Table of Contents

| | | |
|----------|--|-----------|
| 1 | INTRODUCTION | 1 |
| 2 | RECOVERY OF WASTE SOIL | 2 |
| 2.1 | Restoration Requirements | 2 |
| 2.1.2 | Soil for restoration | 5 |
| 2.2 | Engineering Requirements | 7 |
| 2.2.2 | Soil for Engineering | 7 |
| 3 | IMPLEMENTATION OF WRP | 9 |
| 3.1 | Appropriate Waste Types | 9 |
| 3.2 | Waste Acceptance | 11 |
| 3.2.2 | Pre-Acceptance | 11 |
| 3.2.3 | Acceptance | 11 |
| 4 | ENVIRONMENTAL PROTECTION | 12 |
| 4.1 | Conceptual Site Model | 12 |
| 4.2 | Surface Water Management | 12 |
| 5 | DEMONSTRATION OF WASTE RECOVERY | 14 |
| 5.1 | Recovery Test | 14 |
| 5.2 | Certainty of Use | 14 |
| 5.3 | Financial Certainty | 14 |

List of Figures

| | | |
|------------|--|----|
| Figure 2-1 | Phasing of landfill construction | 2 |
| Figure 2-2 | Approved Restoration Topography and Landscaping | 3 |
| Figure 2-3 | Contour Plan of Restored Area (east), Active Area (centre) and Undeveloped Area (west) | 4 |
| Figure 2-4 | Proposed Restoration Profile | 5 |
| Figure 2-5 | Schematic section through capping | 6 |
| Figure 4-1 | Surface Water Collection Ponds and Monitoring Points | 13 |

1 INTRODUCTION

Withyhedge landfill site is situated 5.5 km to the north of Haverfordwest in Pembrokeshire, Wales. It has operated since the mid-1980s when it was first developed by the local authority for municipal refuse disposal. The site is now owned by Resources Management Limited (RML) a privately owned company that has recently been acquired by the Dauson Group. The site has planning permission issued originally by Dyfed County Council and an Environmental Permit (Number MP3330WP) issued by Natural Resources Wales (NRW), the waste regulator for Wales .

As part of the sustainable operation of the landfill, the operator seeks to use waste comprising of naturally occurring soils for restoration and engineering. Landfill restoration comprises the placement of an even layer of soil on top of the landfill above an engineered cap to return the land to beneficial use. Landfill engineering comprises the use of selected waste materials to construct elements of the landfill in accordance with strict engineering standards.

To enable the use of waste in restoration and engineering, NRW require that this activity must be separately authorised in the landfill permit. In this context, this Waste Recovery plan (WRP) sets out the framework that will need to be satisfied to demonstrate that the appropriate wastes are being recovered.

2 RECOVERY OF WASTE SOIL

2.1 Restoration Requirements

Landfilling within the Permit boundary is being undertaken in three phases. The first phase was in the east (Phase 1) whilst the current Phase 2 operations are central with Phase 3 on the west, as shown on Figure 2-1.

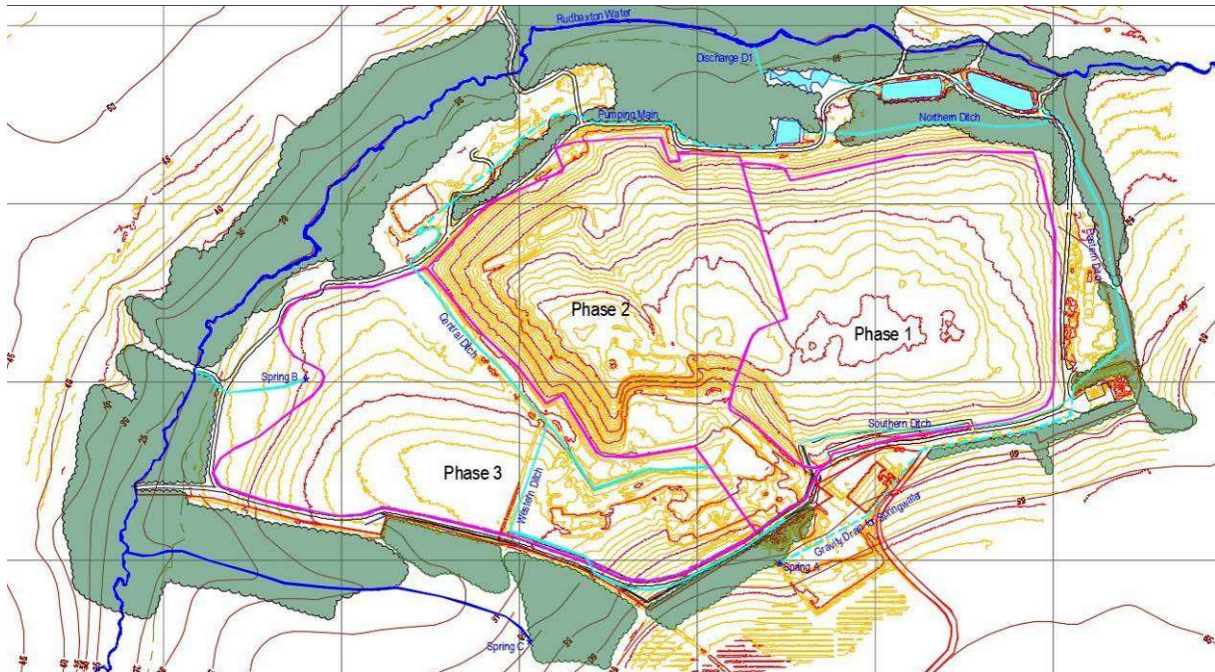


Figure 2-1 Phasing of landfill construction

Two thirds of the site have already been used for landfilling in Phases 1 and 2. Of these two thirds that have already been used for disposal operations, all but the western edge has been permanently capped with flexible membrane liner overlain with restoration soil. These capped areas are considered to be “completed” and closed and there are no proposals to dispose of further wastes in these areas of the landfill. All other areas of the site are currently temporarily capped.

The currently approved restoration plan for the whole site is shown below on Figure 2-2, a drawing originally referred to as WHV5.

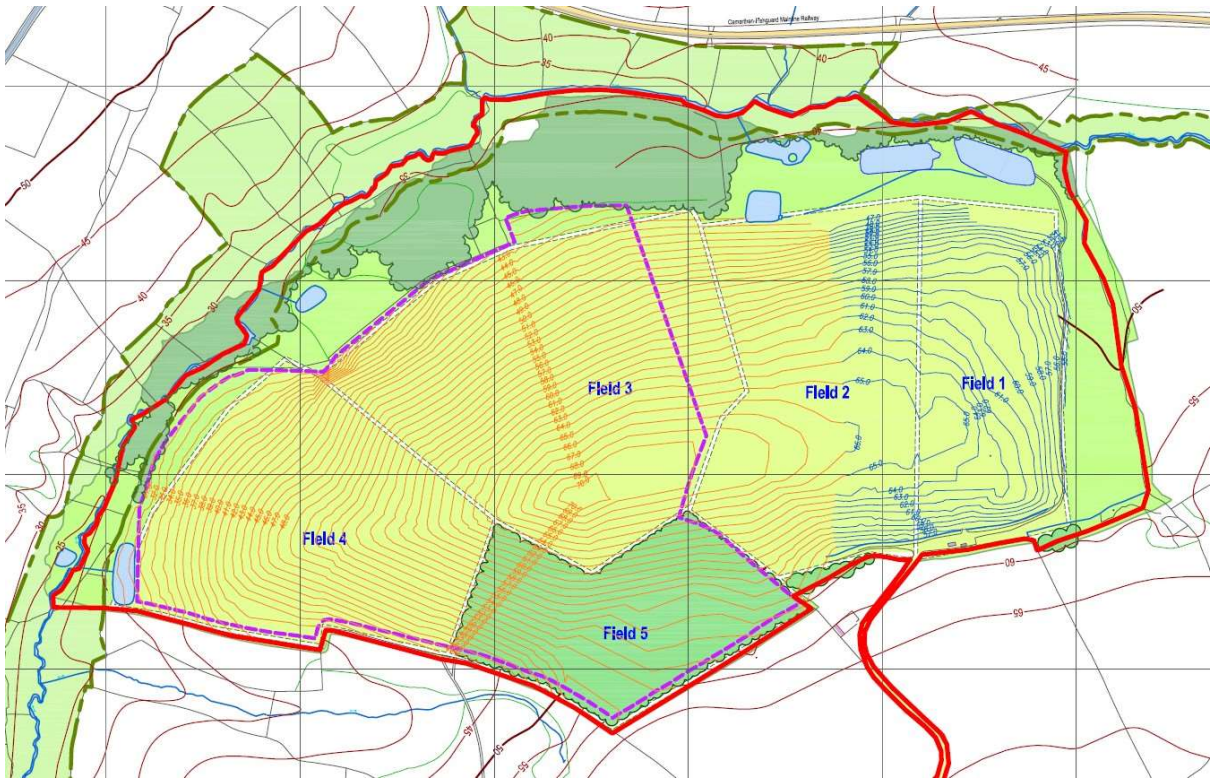


Figure 2-2 Approved Restoration Topography and Landscaping

The approved plan shows a whaleback profile, elongated west to east with the principal side slopes dropping to the north and south. The eastern edge of the contour lines are shown in blue and are visibly less regular than the brown contours elsewhere. It is thought that the blue contours represent the actual landform of the completed part of the site when the restoration plan was drafted in 2008, with the brown contours being proposed levels.

The current capped landfill extends over two thirds of the restoration surface shown on the approved plan. The completed area has an irregular western boundary following the eastern boundaries of Fields 4 and 5 shown on the plan.

Topographic surveys are currently carried out at quarterly intervals and are flown by drone to produce high resolution 3d images on the Propeller platform which is shared with NRW. A topographic contour plan of the site is shown below on Figure 2-3.



Figure 2-3 Contour Plan of Restored Area (east), Active Area (centre) and Undeveloped Area (west)

Detailed examination of the contour lines on Figures 2-2 and 2-3 reveals that they are not the same and this has led to the development of a new restoration plan. This plan has been developed following consultation with the Local Planning Authority (LPA) to take account of aspirations for the landscape, ecology and after-use of the site. This engagement has led to the revision to the proposed surface of the remaining part of the site shown in Figure 2-4 and is the subject of the substantial Variation application currently being determined by NRW.

The proposed restoration surface is shown on Figure 2-4, but the reader should note that the field boundaries and numbers have been changed from those on WHV5 (shown on Figure 2-2). The surface follows the existing contours over Fields 1 to 5 and the eastern parts of Fields 6 and 7. To the west of this the shape of the landform is different to the currently approved surface, as a comparison with Figure 2-2 shows. The landform is now more sinuous, with a broad shallow valley between Fields 6 and 10, a deep valley between Fields 9 and 10 and shallow more uniform slopes to the south and south west in Fields 8 and 9.

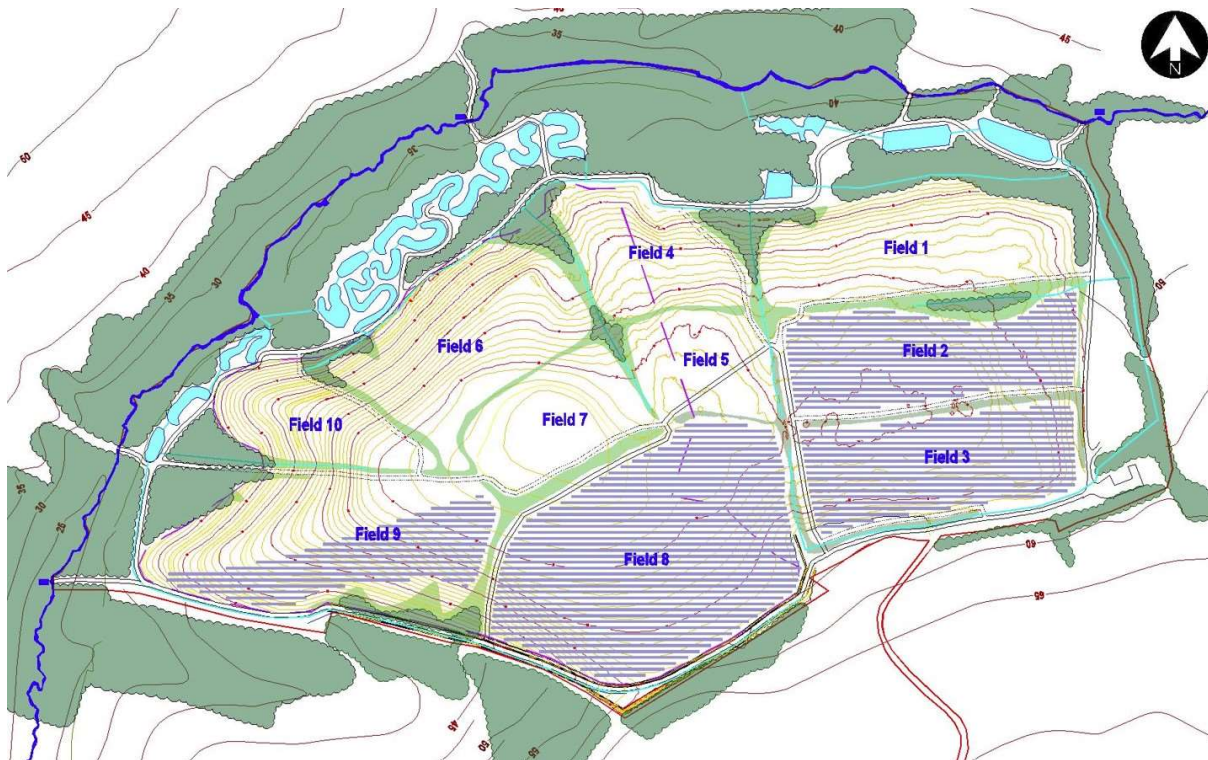


Figure 2-4 Proposed Restoration Profile

The revised plan takes ecological opportunities for the land by joining the top of the landform to the valley bottom with scrub and overgrown hedges. The scrubby field edges often contain surface water ditches that drain the cap. The valley between Fields 9 and 10 draws the toe of the landfill southward from the approved profile; this will avoid placing waste over an existing ephemeral spring. Tracks and landfill gas infrastructure follow the field boundaries where this is possible to allow maintenance with light machinery.

The after use for the landfill on the currently approved plan is low grade agricultural use for sheep grazing with little ecological opportunity. The proposed scheme provides wildlife corridors and divides the area into smaller fields for agricultural use on the northern slopes. The site is only overlooked from the north and therefore the scheme provides external views of small fields with scrubby edges linking down the landform into the wooded valleys. To the south, where the site is not overlooked from roads or properties, opportunities for solar energy will be explored.

The management of surface water at the site will follow the same strategy as is already approved with a series of ponds each with its own monitored discharge into Rudbaxton Water.

2.1.2 Soil for restoration

Withyhedge landfill is progressively restored, that is, upon completion of each cell it is contoured and then capped with a moisture barrier to prevent rainfall infiltration. To make an acceptable surface for agricultural and other post-closure uses a layer of soil is spread over the cap. The system used at this site comprises 800mm of sub-soil overlain by 200mm of topsoil to achieve the 1m thickness soil restoration layer. A typical cap cross section is shown on Figure 2-5.

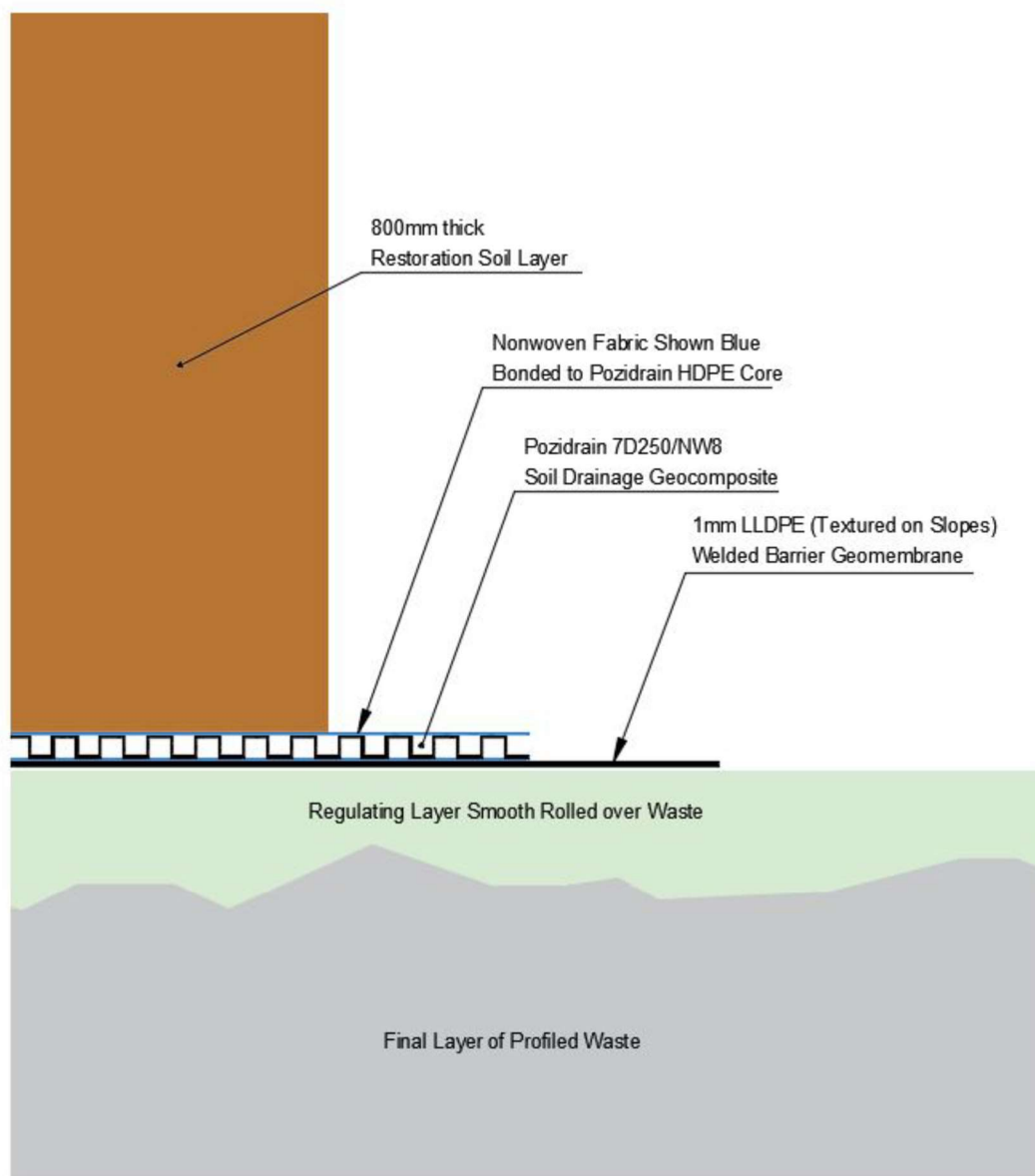


Figure 2-5 Schematic section through capping

Until recently, sub-soils for use in capping have been won from within the site, but this resource is now depleted although there is still a sufficient stockpile of topsoil. The operator therefore must source subsoil from off-site sources to complete the restoration works which is a requirement of the restoration plan, the Permit and planning permission.

As the area of landfill yet to be restored amounts to 223,850m², the volume of restoration sub-soil required to complete the landfill will be 179,080m³. This equates to circa 300,000tonnes which over an expected lifetime of 10years is 30,000t per annum. As soil reserves do not become available at a uniform rate RML will accept suitable soils into its designated storage area, already agreed with WRA, to await placement.

In order for any candidate waste soil to be considered acceptable for use in the landfill restoration works, its performance has to be evaluated. Only materials able to meet the specification set out in the approved Construction Quality Assurance documentation would be proposed for the works and the use of these materials would have to be agreed by the

Regulator during the review of pre-construction documentation. Soils to be used in restoration are routinely sampled and tested in accordance with the CQA Plan. The Plan has to first be approved by NRW before works can commence, so the sampling and testing regime for the pre-selected materials will already be defined before soils are used. This approach provides a robust means to control the use of waste soils and to ensure that they are fit for purpose.

2.2 Engineering Requirements

Soils for use in landfill engineering works include:

- materials to build to formation
- the forming of bunds and embankments, and
- clays used in mineral basal liner construction

Each use has its own specific geotechnical and chemical considerations that leads to a design specification for the works. In the specification, the performance of the soils in terms of geotechnical properties and limits on the concentration of substances is defined. The design specifications are submitted as an appendix to the Construction Quality Assurance Plan for NRW review and acceptance before any proposed works can be undertaken.

In order for any candidate waste soil to be considered acceptable for use in the landfill engineering works, its performance therefore has to be evaluated. For geotechnical design this will include geotechnical laboratory testing and a review of these results against the design of the works. Only materials able to meet the specification would be proposed for the works and the use of these materials would have to be agreed by the Regulator during the review of pre-construction documentation.

A similar safeguard is in place for the chemical compatibility of the soils. Waste soils would have been sampled and tested by the donor site and these data would be reviewed and compared against chemical criteria developed to be protective of the environment. Only if it can be shown that the soils present no risk to the local environment would their use be proposed as part of the CQA Plan.

Soils used in engineering works and restoration are routinely sampled and tested in accordance with the CQA Plan. The Plan has to be approved by NRW before works can commence, so the sampling and testing regime for the pre-selected materials will already be defined before soils are used. This approach provides a robust means to control the use of waste soils and to ensure that they are fit for purpose.

In the event that a material with geotechnical properties that are not equivalent to or better than those assumed in the SRA is proposed for the works, then any design proposal will have to be supported by re-running calculations made in the SRA. All materials used for engineering purposes will be verified to meet the engineering requirements of the SRA.

2.2.2 Soil for Engineering

Clay soils used for landfill lining are required for each cell. The clays are 500mm thick and are carefully controlled during placement to ensure that the specification set out in the approved CQA documentation is met. All liners have to be verified with a significant number of samples and tests, guaranteeing its future performance. At this stage, 129,421m² of landfill liner is yet

to be constructed and this will require 64,700m³ of compacted clay or 130000tonnes over the remaining life of the landfill, an average of 13,000tonnes per annum.

With the additional requirement for smaller quantities for separation bunds and making up any shortfall in cut/fill balances, the estimated figure of 50,000tonnes per annum is appropriate for restoration and engineering purposes.

3 IMPLEMENTATION OF WRP

As each aspect of landfill development must first be approved by NRW the implementation of the WRP and the use of soil will be tightly controlled at each stage of development. This will ensure that only the appropriate soil is used in appropriate quantities for specific uses.

3.1 Appropriate Waste Types

Available NRW guidance indicates that a large number of waste codes are potentially acceptable for recovery. The implication of this guidance is that materials that do not fall on this list are not appropriate, and therefore this WRP will consider only those materials listed in Table 3-1 as possibly suitable for recovery within the landfill.

However, the presence of a waste on the list does not mean it is suitable for recovery at this site, as it has to meet the approved Specification for the specific purpose. For example, soils for restoration must meet grading and chemical criteria set out in the Capping CQA Plan, clays for landfill lining have to meet the engineering specification criteria for strength, grading, permeability and clay content. The acceptance criteria for each proposed use is set out in a series of documents required to be submitted to the Waste Regulator for review prior to commencement of the works. These documents include the design and specification for the scheme, the Construction Quantity Assurance Plan and Source Evaluation Reports.

The Permit and the formal engineering management system controlled through Permit conditions means that the procedure of evaluating proposed waste materials against a Specification is tightly controlled by NRW. This provides a high degree of assurance that the soils will be suitable for the purpose, will cause no environmental harm or risk and will be fully recovered once used for the purpose. The use of soils in this way will ensure the substitution of natural resources from quarries and borrow pits.

Table 3-1 Waste types NRW normally accept for recovery*

| EWC Code | Waste description |
|---|--|
| 19 01 12 | Bottom ash and slag (incinerator bottom ash) |
| 10 01 01 | Bottom ash and slag from power stations (furnace bottom ash) |
| 17 01 02 | Bricks |
| 17 01 01 | Concrete |
| 19 12 12 | Crushed bricks, tiles, concrete and ceramics, including mixtures of materials. This excludes metal from reinforced concrete and fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard or residual fines from mechanical treatment of mixed waste at transfer stations |
| 17 05 06 | Dredging spoil |
| 16 01 03 | End of life tyre bales |
| 10 09 03 | Furnace slag (from casting of ferrous pieces) |
| 10 10 03 | Furnace slag (from casting of non-ferrous pieces) |
| 19 12 05 | Glass |
| 10 01 15 | Incinerator bottom ash |
| 19 12 09 | Minerals (such as sand and stones) from the treatment of waste aggregates that are otherwise naturally occurring minerals. This excludes fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard or residual fines from mechanical treatment of mixed waste at transfer stations |
| 17 01 07 | Mixtures of concrete, bricks, tiles and ceramics |
| 10 01 02 | Pulverised fuel ash from power stations |
| 17 03 02 | Road base and road planings other than those containing coal tar |
| 17 05 04 | Soil and stones (topsoil, peat, subsoil and stones) |
| 02 04 01 | Soil from cleaning and washing beet |
| 19 13 02 | Solid wastes from soil remediation other than those containing dangerous substances |
| 19 08 99 | Stone filter media only (if cleaned to remove sewage contamination) |
| 17 01 03 | Tiles and ceramics |
| 17 05 08 | Track ballast, soil and stones other than those containing dangerous substances |
| 19 12 12 | Treated bottom ash including incinerator bottom ash and slag other than containing dangerous substances only |
| 10 02 02 | Unprocessed slag |
| 10 12 08 | Waste ceramics, bricks, tiles and construction products (after thermal processing) |
| 10 13 14 | Waste concrete and concrete sludge |
| 01 04 08 | Waste gravel and crushed rocks other than those containing dangerous substances |
| 01 04 09 | Waste sand and clays |
| 01 01 02 | Wastes from non metalliferous excavation |
| 10 02 01 | Wastes from the processing of slag |
| *Full list of waste and conditions available on NRW website. Abbreviated summary provided for illustration. All relevant conditions would fully apply to this WRP. Recovery would involve only small number of waste types from above list with specific waste codes and descriptions listed in relevant CQA documentation. | |

3.2 Waste Acceptance

All waste accepted at Withyhedge landfill is subject to a series of checks to ensure that it is as described and can be accepted for disposal. The materials accepted for recovery will be no exception and will essentially follow the same series of checks commencing with pre-acceptance.

All procedures will be integrated to the documented management system and their implementation overseen by the Technically Competent Manager.

3.2.2 Pre-Acceptance

Pre-acceptance procedures will include assessment of the potential source and completion of a Waste Acceptance Form (WAF). The soils will only be from sites where there is no suspicion and demonstration of contamination i.e.

- Greenfield sites not subject to past contaminative use, or
- Brownfield sites where the natural soils have been extensively characterised and proven to be clean.

Prior to any import, any waste must be pre-assessed to determine whether the site can accept it without risk to human health or to the environment.

These documented assessments will include review of source characterisation reports that will need to include site history and chemical test results to demonstrate that the soil is naturally occurring and has a waste code and description that meets those listed in this WRP and relevant CQA documentation.

3.2.3 Acceptance

Materials imported onto the site will be tipped under the guidance of the trained site operatives to ensure materials comply with the description on the WAF form. The vehicle will go direct to the site weighbridge office where the waste transfer note will be inspected. If appropriate for acceptance the vehicle will then be weighed and directed to the appropriate storage area; the operator has non-disposal areas already agreed with Welsh Revenue Authority.

Only permitted waste that conforms to the type and description in the CQA documentation and this WRP will be accepted. This will be initially determined through verification of the waste transfer note and visual inspection upon tipping and subsequent testing. Any non-conforming materials will be identified and dealt with in accordance with the site documented management system including use of quarantine area. All non-conforming materials will ultimately be returned to supplier. Importation of the waste stream from the supplier will be stopped pending evaluation of the cause of non-conformance and measures required to rectify.

All of these measures will be set out in the relevant CQA documentation.

4 ENVIRONMENTAL PROTECTION

The use of waste in a recovery operation must not cause pollution or any other environmental problems. To help demonstrate that the proposed use of waste is safe and sustainable the conceptual site model will be used to aid focus of the assessment of plausible risks at the time the specific Specification is compiled in the CQA documentation.

4.1 Conceptual Site Model

Restoration soils will be placed above impermeable capping membranes and soil for engineering will be placed below the basal lining systems.

As the after-use for the site is principally agricultural, there will be very limited direct human contact with the soils. Rather the restoration soils will provide a growing medium to support animal husbandry. In this context, there are very limited risks to human health due to the lack of receptors, their infrequent use of the land, use of machinery rather than hand-tools and the presence of vegetation limiting opportunity for direct contact. Rainfall landing onto the restoration soils will ultimately migrate under gravity drainage to the surface water collection ponds along the northern boundary of the site and this aspect is discussed further below. For this reason, the CQA documentation will ensure that only inert sub-soils are used for restoration and that they are free of any materials that could damage the underlying capping systems.

Unlike the restoration soils, the engineering soils will be below the basal lining system and waste mass. In such a position there is no possibility of human interaction, apart from during the construction phase, and very limited opportunity for contact with any water. In this context, the risks are negligible, and the focus of the specification set out in the CQA documentation will focus on the engineering properties that must be satisfied.

In all cases, the CQA documentation will set out that any soil must not be a source of odour and will not release any more dust than site won soils.

4.2 Surface Water Management

The surface water collection system is intended to receive surface water at its unattenuated runoff rate and then provide sufficient retention time to allow settlement of suspended solids before discharge to Rudbaxton Water via consented discharge. Recently, the existing ponds, which have been shown to be effective for many years, have been extended to provide additional retention capacity and wildlife habitat. The new system, comprising a series of sinuous ponds, is shown on Figure 4-1.

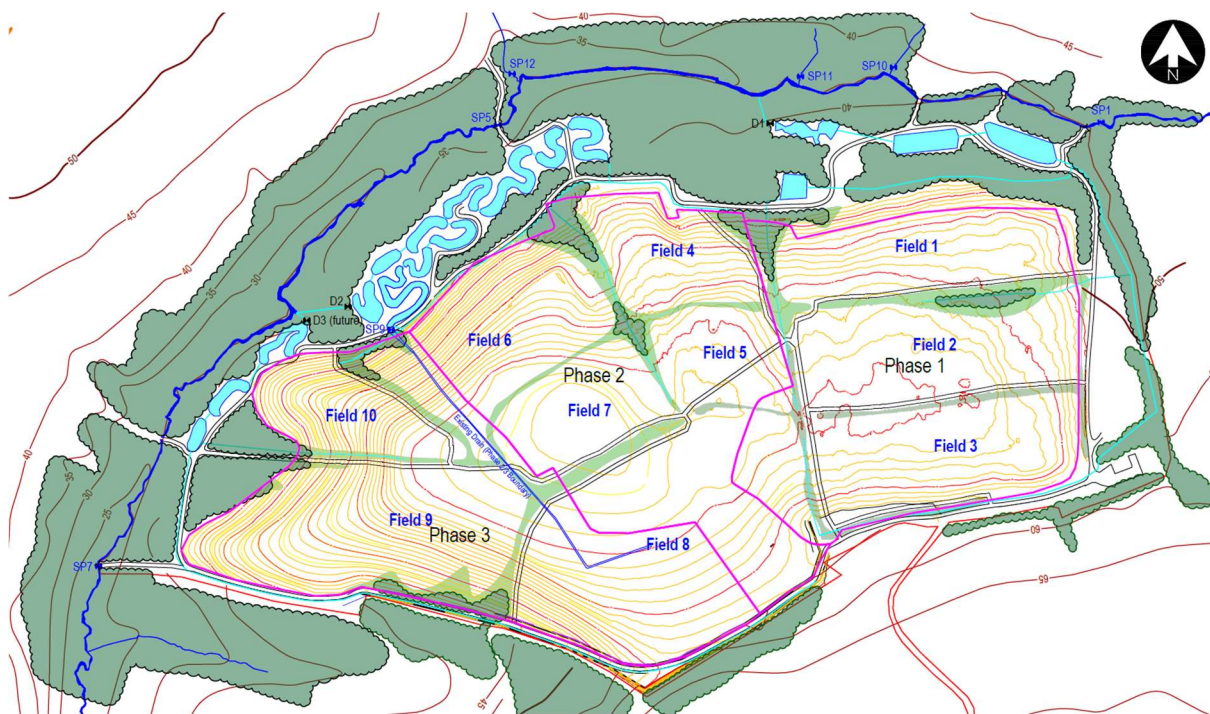


Figure 4-1 Surface Water Collection Ponds and Monitoring Points

The objective of the design of the ponds is to provide the same or greater capacity per unit area drained as the existing system which has proven to reliably collect and treat surface water from the site over many years of operation.

In this context, any particulates mobilized from the restoration soils will be collected in the surface water management system. To ensure the system is performing as expected the surface water quality is monitored with thresholds set in the Permit. As only inert soils will be utilized in restoration, this system will ensure that the use of waste will not detrimentally impact the environment. With the quality of the soil for restoration controlled through the CQA documentation and the surface water system closely managed and monitored, there is ample opportunity for control and intervention yet little risk of the proposed use of soil detrimentally impacting controlled water.

5 DEMONSTRATION OF WASTE RECOVERY

5.1 Recovery Test

The use of waste soils in restoration and for landfill engineering will result in the waste serving a useful purpose and avoid the use of primary materials. As the proposed activities are not disposal, the Landfill Directive standards do not apply.

Restoration and landfill engineering are key components of the sustainable operation of the landfill and are obligated by the planning permission, Permit and supporting technical documentation. To achieve the required restoration profile and after-use requires the placement of soil suitable for use. Similarly, landfill engineering requires the use of fill materials that meet the tight specifications set out in approved CQA documentation. There is therefore a clear obligation on the landfill operator to carry out these activities in a safe and stable configuration that protects the environment and human health. All aspects where waste is to be used will be set out in CQA plans and CQA Validation reports confirming that the works undertaken achieve the obligations and will document that the waste was used in the appropriate quantity and was suitable for use. Strict controls will apply, ensuring only the appropriate quantity of waste suitable for use is recovered. In this framework, the implementation of the Waste Recovery Plan is subject to ongoing scrutiny until the landfill ceases to operate and the land-form restored.

5.2 Certainty of Use

The site is subject to Permit and Planning conditions that require works to be carried out in accordance with the design and specification agreed by NRW and LPA. There is no means to avoid the construction of those elements that waste soils could be used for. Accordingly, there is a need for the soils in order for the site to operate. The operator is obligated to carry out restoration works and is able to use waste soils as an alternative to non-waste sources.

5.3 Financial Certainty

If the operator is able to use waste soils instead of non-waste soils a commercial advantage is secured. RML is well resourced by income from its disposal activities and therefore is able to pay for non-waste soil sources, however, the use of waste soils that meet the specification allow the required works to be carried out more economically. In the event that the operator was to find a shortage of waste soils it would purchase soils from other non-waste sources.



GEO
TECHNOLOGY

Geotechnical &
Environmental Services

Ty Coed
Cefn-yr-Allt
Aberdulais
Neath SA10 8HE

T 01639 775293
F 01639 779173

enquiries@geotechnology.net
www.geotechnology.net