

Compliance Assessment Report CAR_NRW0048411

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	28 th May 2025	Time in	09:45	Time out	12:30
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Parts of permit assessed	Site Inspection
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NRW Lead officer	Rhodri Morgan	Accompanied By	Elliot Jones
Report sent to – Name and position	Phil Ridley – Director	Date	2 nd June 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; specifically Cell 9.

Introduction

A routine site inspection was undertaken on the 28th May 2025, to assess compliance with some of the conditions set out in the operator's EPR permit.

NRW Officers were accompanied at times throughout the site visit by the Site Manager and Group Technical Manager.

While onsite we also undertook an inspection of the Waste Transfer Station (WTS) which is operated under a separate EPR Permit (QP3098FL). The findings from this element of the site visit have been documented within a separate CAR¹.

Site Observations

Surface Water Management

The surface water emission point for Phase 2 of the landfill – D2 – was inspected; no visual evidence of pollution was noted.

A brief discussion was held regarding the MCERTS requirements of the flow monitor installed at D2. The Operator confirmed they are working towards MCERTS accreditation; in the meantime, the device has been suitably calibrated.

Topsoil has been added to the area surrounding the recently constructed surface water ponds (D2). RML confirmed hydroseeding of this area would be undertaken throughout June 2025.

¹ CAR_NRW0048430

Reeds from the Phase 1 surface water system have been transplanted throughout sections of the new system (Phase 2). These will eventually stabilise the ponds and improve the effectiveness of the system. Further work is required to ensure the transplanted reeds establish.

Cell 10 Construction

NRW confirmed within CAR_NRW0048284 that we are satisfied with the construction proposals covering Cell 10 (Phase 2).

The earthworks to achieve the formation level of Cell 10 and the intercell bund have been completed. This has consisted of filling to reach final levels; however in places excavations have also been required.

No unsuitable material was noted during the inspection of the Cell 10 earthworks.

Operational Area (Cell 9)

The current operational area is within Cell 9 Sub-Cell C. NRW Officers confirmed that the leachate well associated with Sub Cell C had been connected to the leachate extraction system.

We inspected the active tipping area and examined the deposited wastes. The wastes that we inspected did not contain any banned or prohibited wastes. No landfill gas odours were noted in the areas we inspected.

Temporary capping has been installed along the flanks of Cell 9 Sub-Cells A and B. The temporary cap has been sealed to the leachate and landfill gas infrastructure where appropriate.

A fourth layer of horizontal wells have been installed throughout Cell 9 Sub-Cells A and B. The landfill gas technician was in the process of completing the installation of the horizontal wells with gas tight seals. The installation of the horizontal gas wells appeared consistent with the CQA Plan (CAR_NRW0045814).

A series of pin wells has been installed throughout Cell 9. RML advised that the pin wells are not performing as efficiently as the horizontal wells and remain isolated from the gas abstraction system. It was agreed that no further pin wells would be installed while the landfill gas being generated within Cell 9 is being suitably managed by the horizontal wells.

The Operator advised that the gas abstraction infrastructure installed throughout Cell 9 is currently recovering approximately 220m³/h of landfill gas.

Odour Assessment

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

Pest Management

A large number of seagulls were noted during the inspection of the operational area.

The Site Manager was instructed to review the sites current pest control measures to ensure they are working efficiently.

Waste Transfer Station (WTS)

Following the inspection of the landfill, NRW officers completed an independent visual and olfactory inspection of the waste already deposited within the WTS's bays – for eventual disposal at the landfill.

No malodorous emissions were noted in any of the waste in these bays. The wastes that we inspected did not contain any waste prohibited by the permit.

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.