

Compliance Assessment Report CAR_NRW0048812

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	9 th July 2025	Time in	09:45	Time out	14:00
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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	18 th July 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	C3 Minor	1.1.1
IR2K Landfill gas management	C3 Minor	2.10.1 & 2.10.2
IR3A Emissions to air	C3 Minor	3.1.1
IR2H Waste Acceptance	Assessed (A)	2.7.2
IR3C Odour	Assessed (A)	3.3.1
IR2I Leachate levels	Assessed (A)	2.8.1

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

Total number of non-compliances recorded	Total non-compliance score
3	12

2. What action is required?

Compliance Criteria	Action needed	Complete by
IR1A, IR2C, IR2K	Ensure the active tipping face is kept as small as possible and covered with a suitable layer of cover material at the end of each working day.	Immediate & Ongoing

Compliance Criteria	Action needed	Complete by
IR1A, IR2C	Operator to use material identified within approved waste phasing plan as cover material within Cell 9.	1 st August 2025
IR2G	Operator to provide photographic evidence that third layer of horizontal wells has been installed in line with approved CQA Plan.	1 st August 2025
IR2G, IR2K	Open trenches associated with horizontal gas wells to be filled with a suitable layer of fill material.	Immediately
IR2G	Operator to submit CQA Plan for the temporary capping of remaining un-capped areas of Cell 9.	08 th August 2025
IR2G	Operator to provide clarification to NRW over the specific purpose and construction (including and third-party inspection records) of the “access ramp” structure.	08 th August 2025
IR2K, IR3A	Operator to repair the seal around leachate monitoring well (C9ALM1).	Immediately
IR2G	Ensure construction proposals are submitted in accordance with the CQA requirements of your EPR permit.	Ongoing
IR2H	Operator to provide an update on the future of waste disposal activities at the Site.	1 st August 2025
IR1A, IR2G	Operator to provide explanation over the new monitoring boreholes which have been installed next to BH24.	08 th August 2025

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

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

An unannounced site inspection was undertaken on the 9th July 2025, to assess compliance with some of the conditions set out in the operator's EPR permit.

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 CAR.

Site Observations

Odour Assessment

Prior to the site inspection, an offsite odour assessment was undertaken by NRW officers at several points within the surrounding community. The weather conditions during the assessment were overcast, with a light wind emanating from the northeast.

No odours attributable to the landfill were detected during the offsite odour assessment. The findings of the assessment were shared with RML on our arrival at the Site.

A slight landfill gas odour was noted on our arrival at the Site, but this quickly dispersed.

Waste Transfer Station (WTS)

Prior to 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 appear to contain any waste prohibited by either of the site permits (WTS & Landfill).

A GAZOMAT methane detector was used to check several of the waste loads; no elevated methane readings were noted.

Operational Area (Cell 9)

The current operational area is within Cell 9 (Sub-Cell's A – C). The active tipping face covered an extensive area, with large sections of uncovered waste visible. Two compactors were in use to manage the volume of waste being handled.

NRW Officers instructed RML to ensure the tipping face was covered with a suitable layer of cover material at the end of the working day. The Operator was reminded of the importance of maintaining a suitably sized tipping face and of the application of daily cover material at the end of each working day.

Action: Ensure the active tipping face is kept as small as possible and covered with a suitable layer of cover material at the end of each working day.

We inspected the active tipping area and examined the deposited wastes. The wastes that we inspected did not contain any banned or prohibited wastes.

Faint landfill gas odours were noted throughout areas of Cell 9; these were intermittent and not deemed offensive.

Cover Material (Cell 9)

The Operator has started to use shredded general waste as a cover material throughout Cell 9.

The approved waste phasing plan for Cell 9¹ states the following on cover materials:

“Waste will be covered at the end of every working day and stripped off at the commencement of filling on the next working morning. Soil type material or Warrior Fines will be used for this purpose.”

Action: Operator to use material identified within approved waste phasing plan as cover material within Cell 9.

Landfill Gas Management (Cell 9)

A third layer of horizontal gas wells has started to be installed across the current lift of waste in Cell 9. Sections of the horizontal pipework for three wells have not been covered. Whilst the sections of pipework we observed were plain casing they should be covered.

NRW officers were unable to see a gravel pack surround which should be installed surrounding each horizontal well; in line with the approved construction plans².

Action: Operator to provide photographic evidence that third layer of horizontal wells has been installed in line with agreed construction plans.

Action: Open trenches associated with horizontal gas wells to be filled with a suitable layer of fill material.

A fourth and final layer of horizontal gas wells will be installed as the cell approaches its temporary fill level.

The Operator advised us that the gas abstraction infrastructure installed throughout Cell 9 is recovering approximately 250m³/h of landfill gas. The landfill gas composition of Cell 9 is currently favourable for utilisation; with a methane content of >50%, allowing the gas to be

¹ Geotechnology Report Number 2472r1v1d0924 – “Cell 9 Infilling Plan”. Dated: December 2024.

² Geotechnology Report: Withyhedge Landfill Site 2025 Gas Extraction Wells, Temporary Pin Wells and Temporary Horizontal Wells CQA Plan. Report Number: 2491r1v1d1124. Dated November 2024.

used within the landfill gas engines to generate electricity. H₂S levels within Cell 9 are currently <900ppm.

Cell 9 - Temporary Capping

Temporary capping has now been installed along the flanks of each sub cell; completely encapsulating the drainage blanket of Cell 9.

The temporary cap has been sealed to the leachate and landfill gas infrastructure throughout Cell 9 where required.

Construction proposals for the temporary capping of Cell 9 are outstanding.

Action: Operator to submit CQA Plan for the temporary capping of remaining uncapped areas of Cell 9.

Landfill Gas Surface Emissions Check (Cell 9)

A landfill gas check of methane emissions was undertaken by NRW officers at various locations across the capped and uncapped surfaces of Cell 9 (Sub Cell's A – C) using a Gazomat methane detector.

Elevated methane readings were recovered at each monitoring point; indicating the cell is now actively producing landfill gas. RML must ensure that all appropriate measures are followed to minimise emissions of landfill gas from Cell 9.

Methane levels of >50% (>500,000 ppm) were recorded from the leachate monitoring wells associated with Sub Cell's A and B. The methane levels dropped to ≈30% (>300,000ppm) for the leachate monitoring wells within Sub Cell C.

There was a notable difference in methane levels throughout the uncapped sections of Cell 9, appearing to be dependent on the type of cover material. Where a (cohesive) soil type cover material has been used, methane levels of up to 2000ppm (0.2%) were detected. Methane levels of up to 5000ppm (0.5%) were detected where general waste fines had been used as cover material. This highlights the importance of the choice of cover material.

As Cell 9 is now actively producing landfill gas, RML must ensure that the temporary capping is extended as soon as practicable. Additional landfill gas infrastructure must be installed as soon as possible as the cell develops; in line with the agreed construction plans³.

³ Geotechnology Report: Withyhedge Landfill Site 2025 Gas Extraction Wells, Temporary Pin Wells and Temporary Horizontal Wells CQA Plan. Report Number: 2491r1v1d1124. Dated November 2024.

Access Ramp (Cell 9)

An “access ramp” appears to have been partly installed upon the temporary cap’s geomembrane at the northern flank of Cell 9 Sub-Cell A. The purpose of the “access ramp” is unclear, with the site foreman suggesting it is to facilitate future waste disposal activities within Cell’s 6 – 8.

Action: The operator shall provide clarification to NRW over the specific purpose and construction (including and third-party inspection records) of the “access ramp” structure.

During the construction of the access ramp, large pieces of the construction material have been allowed to strike the leachate monitoring well (C9ALM1) within Sub-Cell A; damaging the pipe boot seal (Image 1).



Image 1 - C9ALM1

The damage to the pipe boot seal has provided a pathway for landfill gas to escape from the waste mass. Strong landfill gas odours were detected in the area surrounding the monitoring well and methane readings of >50% were recovered by the GAZOMAT from the failure point in the seal.

The damage to the well and cap sealing detail at C9ALM1 is contrary to permit condition 2.10.1 and 2.10.2, as the operator has failed to take appropriate measures to collect, control and treat landfill gas. As a result of this, a non-compliance score of C3 has been allocated against compliance sub-criteria IR2K (Landfill gas management).

The damage to the well and cap sealing detail has resulted in an unauthorised point source emission which is contrary to permit condition 3.1.1. A non-compliance score of C3 has been allocated against compliance sub-criteria IR3A – Emissions to Air.

Action: Operator to repair seal to leachate monitoring well (C9ALM1).

It does not appear that any protective measures were put in place to protect C9ALM1 or the temporary cap from damage during the construction of the access ramp.

This is in contrary to permit condition 1.1.1. A non-compliance score of C3 has been allocated against compliance sub-criteria IR1A – General Management.

The operator is reminded that construction proposals are required ahead of the construction of any landfill infrastructure. Landfill infrastructure is defined within Schedule 7 of your EPR Permit.

Action: Ensure construction proposals are submitted in accordance with the CQA requirements of your EPR permit.

Leachate Levels – independent compliance checks

Leachate level checks were conducted by NRW Officers at the following random sample of leachate monitoring points (chosen by NRW):

- Cell 13 Sump 2
- C8L1 (Cell 8)
- C9AL1 (Cell 9)
- C9AL2 (Cell 9)

The leachate levels within each monitoring well were found to be compliant i.e. below the 1m limit specified within the EPR Permit.

Cell 10 Construction progress

Cell 10 is being constructed in a phased manner, with Sub-Cell A to the north and Sub-Cell B to the south separated by an internal inter-cell bund. The CQA Engineer was observed – from a distance by NRW Officers – providing supervision of the construction works for the duration of the site inspection.

Construction has progressed ahead in Sub-Cell A where the Geosynthetic Clay Liner (GCL) and Flexible Membrane Liner (FML) were in the process of being laid.

The engineered mineral (clay) layer is still in the process of being installed within Sub-Cell B. It is expected that both sub-cells will be completed by the Autumn.

Pest Management

A considerable number of seagulls were noted during the inspection of the landfill and WTS.

The Operator is in the process of reviewing the site's pest deterrent measures to ensure they are working efficiently.

Landfill Phasing

Cell 9 is currently being filled as a standalone cell, physically separated from the adjacent cell's (Cell's 6 – 8). This approach was adopted by the operator in 2024 in light of the hydrogen sulphide content of the landfill gas being generated from waste deposits within the adjacent cells.

Based on the most recent topographic survey – 2nd July 2025 – it is estimated that Cell 9's remaining capacity is 67,695.5m³. Cell 9's original capacity was stated at 233,026m³, meaning approximately 165,330m³ of waste has been deposited within Cell 9. If waste disposal activities continue at this rate, Cell 9 will reach capacity during September 2025.

As Cell 9 nears capacity, RML need to carefully consider waste disposal activities at the Site. If the decision is made to re-enter Cells 6 – 8, the Operator will need to demonstrate there is no risk of malodorous emissions arising from the release of landfill gas. A specific waste phasing plan and revised waste acceptance plans will also be required.

The Operator is reminded that NRW will require a sufficient period of time to review and approve any submissions.

Action: Operator to provide an update on the future of waste disposal activities at the Site.

General

During the site inspection it was noted that two new monitoring boreholes have been installed adjacent to BH24. The reason for their installation is unclear. The Operator has not submitted new construction proposals or a written request to use previous construction proposals for the construction of these new monitoring boreholes.

Action: Operator to provide explanation over the new monitoring boreholes which have been installed next to BH24.

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.