

Compliance Assessment Report CAR_NRW0048998

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	29 th July 2025	Time in	10:00	Time out	13:00
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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	5 th August 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
IR2G Landfill Engineering	Assessed (A)	2.6.3
IR2H Waste Acceptance	Assessed (A)	2.7.2
IR2K Landfill gas management	Assessed (A)	2.10.1 & 2.10.2
IR3A Emissions to Water	Assessed (A)	2.7.2
IR3C Odour	Assessed (A)	3.3.1
IR4A Records	Assessed (A)	4.1.1

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
N/A	N/A	N/A

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

An unannounced site inspection was undertaken on the 29th 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.

NRW Officers were accompanied at times throughout the site visit by the Site Manager and Landfill Gas Technician.

Site Observations

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).

Waste Acceptance – Level 3 Verification Testing

NRW Officers requested access to the laboratory certificates of the Level 3 Verification Testing which had been undertaken at the site throughout July 2025. The Operator readily provided the certificates.

The purpose of the Level 3 Verification Testing is to independently verify the Level 1 Basic Characterisation Testing and Level 2 Compliance Testing provided by the waste producer.

The testing frequency was found to be consistent with the testing schedule outlined within the approved waste acceptance procedures (WAP)¹. The results of the testing were within the acceptance criteria identified within the WAP.

Operational Area (Cell 9)

The current operational area is within Cell 9 (Sub-Cell's A – C). The active tipping face was suitably sized and being managed by two compactors.

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

The Operator has improved the cover material throughout Cell 9, with a (cohesive) soil type material now covering the majority of uncapped surfaces. This material is listed within Cell 9's approved waste phasing plan². A stockpile of cover material was present within Cell 9, ready to cover the active tipping face at the end of the working day.

The temporary capping along the flanks of Cell 9 is being extended to cover the most recent waste lift.

The damage previously observed to the pipe boot seal of the leachate monitoring well within Sub-Cell A – C9ALM1 – has been repaired³.

Landfill Gas Management (Cell 9)

The installation of the third layer of horizontal gas wells been completed. These wells will be commissioned once they are covered by a suitable layer of waste. The installation of the horizontal gas wells appeared consistent with the approved CQA Plan⁴.

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

The leachate infrastructure within Cell 9 Sub Cell C is now under active gas abstraction, along with the initial row of horizontal gas wells extended throughout the Sub Cell (C).

The gas abstraction infrastructure installed throughout Cell 9 is recovering approximately 300m³/h of landfill gas. The landfill gas composition of Cell 9 is currently favourable for

¹ RML - Waste Acceptance (NSSL ARL Only) - v1.4". Dated: 06 June 2025.

² Geotechnology Report Number 2472r1v1d0924 – "Cell 9 Infilling Plan". Dated: December 2024.

³ CAR_NRW0048812

⁴ Geotechnology Report: Withyhedge Landfill Site 2025 Gas Extraction Wells, Temporary Pin Wells and Temporary Horizontal Wells CQA Plan. Report Number: 2491r1v1d1124. Dated November 2024.

utilisation; with a methane content of >50%, allowing the gas to be used within the landfill gas engines to generate electricity. H₂S levels within Cell 9 remain <900ppm.

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.

Construction has progressed ahead in Sub-Cell A where the protective fabric layer has been laid across the surface of the flexible membrane liner (FML). The drainage aggregate has started to be deployed throughout the sub-cell.

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.

Surface Water Management

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

The area surrounding the recently constructed surface water ponds (D2) has been hydroseeded.

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.