

Compliance Assessment Report CAR_NRW0049131

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	14 th August 2025	Time in	10:00	Time out	12:15
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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	29 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
IR2K Landfill gas management	Assessed (A)	2.10.1 & 2.10.2
IR4A Records	C3 Minor	4.1.2

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

Total number of non-compliances recorded	Total non-compliance score
1	4

2. What action is required?

Compliance Criteria	Action needed	Complete by
IR4A	Action 49131/01 – Ensure that records relating to waste types and quantities are retained and readily accessible on site (electronic or physical), in accordance with permit condition 4.1.2.	12/09/2025

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.

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 which has been 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 site inspection was undertaken on the 14th August 2025, to observe the electrical resistivity leak testing of Cell 10 (Sub-Cell A).

While onsite we also undertook an inspection of the Waste Transfer Station (WTS) which is operated under a separate EPR Permit (QP3098FL). NRW Officers were accompanied at times throughout the site visit by the Site Manager.

Site Observations

Waste Transfer Station (WTS)

Prior to the landfill inspection, NRW officers conducted an independent visual and olfactory assessment of the waste deposited in the Waste Transfer Station (WTS) bays, for eventual disposal at the landfill.

At the time of inspection, only one WTS bay was in use due to a reduction in the volume of waste being accepted at the landfill.

RML confirmed that non-hazardous shredded general waste (EWC Code: 19 12 12) had been received at the WTS that day. This waste stream is listed within the EPR Permit's for both the landfill and WTS (QP3098FL).

No malodorous emissions were detected in the deposited waste. The inspected waste did not appear to contain any materials prohibited under the conditions of either site's permit (WTS and landfill).

Operational Area (Cell 9)

The current operational area is located within Cell 9, specifically Sub-Cells A to C. The active tipping face was appropriately sized and managed using a single compactor.

An inspection of the active tipping area and deposited wastes revealed no banned or prohibited materials.

Large sections of Cell 9 are now covered with a temporary cap, which has been extended along three flanks. The uncapped areas – excluding the operational zone – were covered with a cohesive, soil-type material. Stockpiles of this cover material were present within the cell and available for use at the end of the working day to cover the operational area.

Cell 9 is nearing capacity, and waste disposal activities will soon need to transition to another section of the landfill. RML have reduced incoming waste volumes to extend the lifespan of Cell 9 while construction works associated with Cell 10 are completed.

The Operator was reminded to ensure that activities within Cell 9 remain aligned with the agreed waste phasing plan and that pre-settlement levels are not exceeded. The site manager confirmed that pre-settlement levels have been programmed into the site machinery's GPS system, allowing for precise levels to be achieved.

Landfill Gas Management (Cell 9)

The fourth and final layer of horizontal gas wells has been installed throughout Cell 9. The installation of the horizontal gas wells appeared consistent with the approved CQA Plan¹.

Fifteen permanent gas extraction wells have been initially identified for the southern flank of Cell 9. These will be installed once pre-settlement levels have been reached. RML should ensure the identified wells are installed promptly to provide enhanced gas abstraction throughout the Cell.

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.

NRW Officers observed the electrical resistivity leak testing (ERLT) of Sub-Cell A. During the survey, the contractor identified a test hole introduced by the CQA Inspector and a second anomaly. Upon removal of the drainage blanket, the two anomalies were exposed, revealing the test hole and a small “knife” cut in the Flexible Membrane Liner (FML). The lining contractor was on-site and preparing to repair the identified defects.

Following the completion of the ERLT, concrete target pads will be installed within the sub-cell.

¹ Geotechnology Report: Withyhedge Landfill Site 2025 Gas Extraction Wells, Temporary Pin Wells and Temporary Horizontal Wells CQA Plan. Report Number: 2491r1v1d1124. Dated November 2024.

A discussion with the CQA Inspector confirmed that there have been no major non-compliances or deviation from the approved CQA Plan² during the construction of Cell 10.

RML advised that the CQA Validation Report for Sub-Cell A will be submitted during the week commencing 18 August 2025. Construction of Sub-Cell B is ongoing, with the engineered mineral liner nearing completion

Waste Records

RML's EPR permit requires records relating to waste types and quantities to be retained onsite for at least 6 years (permit condition 4.1.2). NRW Officers requested a selection of these documents, to evidence that waste volumes had been reduced to manage the remaining capacity of Cell 9.

The operator was unable to produce these records onsite, with the site manager stating they are instead stored centrally at RML's registered office in Cardiff.

The failure to retain records onsite constitutes a breach of permit condition 4.1.2. Consequently, a non-compliance score of C3 has been assigned against compliance sub-criteria IR4A – Records.

Action 49131/01 – Ensure that records relating to waste types and quantities are retained and readily accessible on site (electronic or physical), in accordance with permit condition 4.1.2.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

² CAR_NRW0048284

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.