



Docksway Disposal Site

Environmental Review for Area 1 - 2019

On behalf of **Newport City Council**



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1 Introduction

1.1 Background

- 1.1.1 Docksway Disposal Site is located approximately 3km south of Newport city centre and is centred on National Grid Reference ST 305 853. The site is operated by Newport City Council, referred to hereafter as NCC. The location of the site is shown on **Figure 1**.
- 1.1.2 The site is approximately split into a northern part (Area 1) and a southern part (Area 2):
- Area 1 is an unlined ('dilute and disperse') landfill that was operated under Waste Management Licence (WML) number EAWML30058 and is now closed, and in the aftercare phase; and
 - Area 2 is an engineered containment landfill that is active and operated under Pollution Prevention Control (PPC) Permit No. DP3733BK, Variation Number V004 (July 2016).
- 1.1.3 In accordance with the Closure Plan for Area 1, sampling of groundwater and leachate is undertaken annually, and the results are reviewed and reported to NRW on an annual basis. The requirement for environmental reviews of the sampling and other data is undertaken every four years to allow sufficient data to be collected for review of temporal trends to be undertaken. An environmental review report for Area 1 was last prepared and submitted to NRW in 2016.

1.2 Scope

- 1.2.1 This document reviews the data produced by various environmental monitoring programmes and management systems and provides an analysis of any trends in the data over the preceding four years, together with longer term trends. The data review and analysis are used to provide an appraisal of the potential environmental risks associated with Area 1 of the site. This document includes the following:
- Review and analysis of the Area 1 environmental monitoring results collated over the past 4 years;
 - Comments on temporal trends observed in the longer-term monitoring data collected; and,
 - A review of the potential risks to sensitive environmental receptors.
- 1.2.2 Guidance for readers of this report is given in **Section 11** of this report.

1.3 Aftercare Monitoring Plan

- 1.3.1 An environmental monitoring programme commenced at the Docksway Disposal site in September 2003, in accordance with the requirements of Condition 62 of the Area 1 WML. The environmental monitoring programme was modified once definitive closure was obtained for Area 1, and the environmental monitoring continued in accordance with the aftercare monitoring plan. The requirements of the aftercare monitoring plan are described below:
- Surface water quality samples obtained monthly.
 - Groundwater and leachate levels recorded every 6 months
 - Groundwater and leachate samples obtained on an annual basis; and,

- Gas monitoring carried out every 6 months;

1.4 Related Work

- 1.4.1 The environmental data commented on in this report has been forwarded to NRW previously in the form of interim environmental monitoring reports.

2 Surface Water Quality Monitoring

2.1 Current Monitoring Programme

- 2.1.1 A surface water monitoring programme commenced at Docksway Disposal site in September 2003, in accordance with the requirements of Condition 62 of the Area 1 WML and continues in accordance with the Closure Plan for Area 1 and the Environmental Permit for Area 2 (EPR/DP3733BK).
- 2.1.2 Since commencement of the monitoring, NCC has undertaken monthly surface water monitoring and has reported these results to NRW on a generally monthly basis. Details of the monitoring methodology and protocols for the site (including the frequency of testing and the range of chemical testing suites used) are presented in the Monitoring Plan for Area 1, (PBA, 2011)[1], and also the Monitoring Plan for Area 2: Landfill Extension, (PBA, 2005)[2].
- 2.1.3 Sampling locations SW_25 and SW_26 are the subject of individual discharge consents and will continue to be monitored in accordance with those consents, whilst all other locations will continue to be monitored in accordance with the Closure Plan and EP.
- 2.1.4 It is noted that sampling point C3_Asb was established at the start of 2017 and is specific to Cell 3a in Area 2. There is no commentary within this report regarding C3_Asb as this is provided in the separate Environmental Performance Report for Area 2.
- 2.1.5 A total of six monitoring locations have been used for assessing the surface water quality over the past 12 months for Area 1 as part of this report, the locations of which are shown on **Figure 2**, and details are tabulated below:

Table 2.1 - Details of the Surface Water Monitoring Locations

Position Monitored	Location
SW_1A	Ebbw Upstream
SW_11	North Pond
SW_23	Discharge to Maes Glas Pill from Docks Drain Outfall (Disused Culvert)
SW_24	Oxbow Lake Position 1
SW_25	Surface Water Management System Discharge Point. Subject to a discharge consent.
SW_26	Area 2 Surface Water. Subject to a discharge consent.

2.2 Surface Water Hydrochemistry

Compliance Limits

- 2.2.1 Notwithstanding the surface water discharge consents, surface water compliance limits have not been set by NRW as part of the Waste Management Licence. Therefore, comments on the surface water hydrochemistry with respect to compliance limits are only presented in this report where applicable. The data and any temporal trends in the data are presented and commented upon for those positions without compliance limits.

2.2.2 Surface water sampling points SW_25 and SW_26, are subject to discharge consents (Consent Number AN0394301 and AN0401301 respectively) and have compliance limit values as set within the consents.

SW_25

2.2.3 In the last 4 years, SW_25 has been sampled eleven times and was recorded dry on each of the other monthly monitoring visits.

2.2.4 The following provides commentary on the laboratory test results compared to the consented compliance limit values:

- On all the occasions that SW_25 was sampled in the last 4 years the concentration of Ammoniacal Nitrogen was significantly below the discharge consent limit of 30mg/l and adverse trends have not been identified in the longer-term data.
- The discharge consent limit of 40mg/l for Biological Oxygen Demand (BOD) was not exceeded at SW_25 in the last 4 years, and the longer-term data does not indicate any developing trends.
- The samples from SW_25 recorded pH values between 7.65 and 8.35 in the last four years which is within the required limits of between 6 and 9 set in the discharge consent.
- The concentration of Total Suspended Solids (TSS) was recorded below the discharge consent limit of 60mg/l during the last four years and adverse trends have not been identified in the longer term data.

2.2.5 There is currently no evidence to suggest that there are any detrimental temporal trends with regard to surface water quality at this location

SW_26

2.2.6 Surface water monitoring point SW_26 was included in the monitoring programme for Area 1 at the start of 2013. In the last 4 years, SW_26 has been sampled eight times and was recorded as dry on each of the other monthly monitoring visits.

2.2.7 The following provides commentary on the laboratory test results compared to the consented limit values.

- There is no acceptable limit value for Ammoniacal Nitrogen in the discharge consent for SW_26. However, although the concentration recorded in January 2019, at 49.2 mg/l, is the highest it has been recorded since 2015, adverse trends have not been identified
- The results of the TSS testing undertaken on the samples obtained from SW_26 recorded concentrations below the discharge consent limit of 60mg/l.
- The pH values recorded at SW_26 were between 7.62 and 8.49 which is within the acceptable range of between 6 and 9, in accordance with the discharge consent.

2.2.8 There is currently no evidence to suggest that there are any detrimental temporal trends with regard to surface water quality at this location.

Commentary on Other Surface Water Monitoring Locations

2.2.9 **Appendix 1-1** presents the results of Ammoniacal Nitrogen concentrations since 2003 at each of the surface water monitoring locations.

- 2.2.10 SW_1A was sampled on 43 occasions in the last 4 years. It can be seen that Ammoniacal Nitrogen concentrations in SW_1A have in all but four instances been recorded below the method detection limit (MDL) for the laboratory (0.2mg/l) in the last 4 years. This is consistent with the longer-term dataset.
- 2.2.11 SW_11 was sampled four times in the last 4 years as part of the annual screen. The recorded Ammoniacal Nitrogen concentration was typically 0.2mg/l, with the exception of a concentration of 0.7mg/l recorded in November 2018. These values are consistent with the longer term dataset.
- 2.2.12 At SW_23 the Ammoniacal Nitrogen concentrations have been relatively consistent, being recorded generally below 25mg/l in the last 5 years.
- 2.2.13 The remaining surface water monitoring location, SW_24, shows a generally consistent trend since commencement of monitoring, with concentrations predominantly below 1mg/l.

Biochemical and Chemical Oxygen Demand

- 2.2.1 **Appendices 1-2 and 1-3** present Biochemical Oxygen Demand (BOD) and Chemical Oxygen Demand (COD) concentrations, since 2003, at each of the surface water monitoring locations.
- 2.2.2 All locations appear to be displaying a generally consistent trend in BOD concentrations with the majority of results recorded at concentrations below 10mg/l.
- 2.2.3 In general, COD concentrations appear to be relatively consistent at all monitoring locations during the last 4 years and in the longer term with results generally below 100mg/l.

Chloride

- 2.2.1 **Appendix 1-4** presents the Chloride concentrations at each of the surface water monitoring locations since 2003. The data indicates that most surface water monitoring locations are showing a generally consistent trend of Chloride concentrations with concentrations at most locations predominantly below 100mg/l.
- 2.2.2 The exceptions to this are SW_23 where concentrations of Chloride have fluctuated significantly from month to month during the last 4 years (from about 55mg/l up to 8030mg/l), as they have done since monitoring commenced.

pH

- 2.2.1 **Appendix 1-5** presents the results of pH monitoring of surface water since 2003 at each of the current surface water monitoring locations. The majority of the pH readings have generally been recorded between about pH 7.5 and pH 8.5, which is within the normal range for all of the monitoring locations in the last 5 years.

Electrical Conductivity

- 2.2.2 **Appendix 1-6** presents Electrical Conductivity (EC) readings in each of the surface water monitoring locations since 2003. The data indicates a consistent trend of Electrical Conductivity, mostly below 5mS/cm at all monitoring locations. This is within the range of the overall dataset.

Total Suspended Solids

- 2.2.3 **Appendix 1-7** presents the concentrations of Total Suspended Solids (TSS) at SW_25 since 2007 and SW_26 since 2013. The data does not currently indicate any developing trends for TSS.

Dissolved Oxygen

- 2.2.4 **Appendix 1-8** presents the Dissolved Oxygen (DO) concentrations recorded at the surface water monitoring locations. The concentrations have generally been between about 5mg/l and 13mg/l, and this is consistent with the overall dataset with no indication of developing trends.

2.3 Review of Potential Risks and Further Monitoring

- 2.3.1 The environmental data obtained for the surface water locations does not indicate any significant adverse trends developing in surface water quality and does not indicate any significant decrease in surface water quality since the previous Environmental Review.

3 Groundwater Quality Monitoring

3.1 Monitoring Programme

- 3.1.1 A groundwater monitoring/sampling programme commenced at Docksway Disposal Site in September 2003 to monitor groundwater quality within the underlying River Terrace Gravel deposits present beneath the site.
- 3.1.2 Details of the groundwater quality monitoring methodology and protocols for Area 1 are presented in the Monitoring Plan for Area 1, (PBA, 2011), except that the frequency of monitoring has been amended to reflect the requirements of the aftercare monitoring plan, as described below.
- 3.1.3 Following definitive closure of Area 1 in October 2014, the groundwater monitoring programme was amended, in accordance with the aftercare monitoring plan. As a result, groundwater levels have been recorded every 6 months and groundwater samples have been obtained annually in Area 1, in accordance with the aftercare monitoring plan
- 3.1.4 The Monitoring Plan for Area 1 includes three compliance well monitoring points - GW03_02, GW03_05 and GW07_07. The locations of these boreholes used as part of the current monitoring and sampling programme are shown on **Figure 2**.
- 3.1.5 Interim groundwater quality reports have been provided to NRW in accordance with condition 61 of the Area 1 WML and the Closure Plan.

3.2 Monitoring Locations and Compliance Levels

- 3.2.1 The three current compliance wells for Area 1 have been monitored since February 2009. The locations of the compliance wells were selected to sample both hydraulically up-gradient and hydraulically down-gradient conditions with respect to the known groundwater flow direction.

Table 3.1 - Groundwater Monitoring Locations

Monitoring Location	Easting	Northing
GW07_07	331113	185287
GW03_02	330586	185694
GW03_05	330932	185870

- 3.2.2 The Control Levels and Compliance Limits for all priority hazardous substances and non-hazardous pollutants are presented in Table 3.2 for the three current groundwater compliance wells. Where the proposed Control/Compliance is based on the laboratory Method Detection Limit (MDL), it should be noted that these will change if the MDL changes.

Table 3.1 - Control and Trigger Levels for Area 1 Groundwater

Priority Contaminant (units)	GW03_02			GW03_05			GW07_07		
	Max	Control Level	Compliance Limit	Max	Control Level	Compliance Limit	Max	Control Level	Compliance Limit
Extractable Petroleum Hydrocarbons (EPH) (µg/l) ⁽¹⁾	114.0	125.4	142.5	129.0	141.9	161.3	390.0	429.0	487.5
Arsenic (µg/l) ⁽¹⁾	33.3	36.6	41.6	28.3	31.1	35.4	31.8	35.0	39.8
Ammoniacal Nitrogen (mg/l) ⁽¹⁾	82.8	91.1	103.5	117.0	128.7	146.3	105.0	115.5	131.3
Benzene (µg/l) ⁽¹⁾	1* (1.3)	1* (1.3)	1* (1.3)	1* (1.3)	1* (1.3)	1* (1.3)	1* (1.3)	1* (1.3)	1* (1.3)
Naphthalene (µg/l) ⁽¹⁾	1* (4)	1* (4)	1* (4)	1* (4)	1* (4)	1* (4)	1* (4)	1* (4)	1* (4)
Nickel (µg/l) ⁽¹⁾	3.7	4.1	4.6	15.0	16.5	18.8	28.0	30.8	35.0
Potassium (mg/l) ⁽¹⁾	74.0	81.4	92.5	119.0	130.9	148.8	180.0	198.0	225.0
Xylene (µg/l)	1* (1.7)	1* (1.7)	1* (1.7)	1* (1.7)	1* (1.7)	1* (1.7)	1* (1.7)	1* (1.7)	1* (1.7)
Phenols (mg/l)	0.016* (0.015)	0.016* (0.015)	0.016* (0.015)	0.016* (0.015)	0.016* (0.015)	0.016* (0.015)	0.016* (0.015)	0.016* (0.015)	0.016* (0.015)
Mercury (µg/l)	0.01*	0.01*	0.01*	0.01*	0.01*	0.01*	0.01*	0.01*	0.01*

Notes
(1) Maximum measured concentration excluding anomalous results
(2) * denotes current laboratory method detection limit, numbers in brackets (*) denotes previous laboratory method detection limit
(3) Hazardous substances are highlighted in orange

3.3 Groundwater Quality

Ammoniacal Nitrogen

- 3.3.1 **Appendices 2-1 to 2-3** present the results of Ammoniacal Nitrogen since 2003 for the three groundwater monitoring locations.
- 3.3.2 There were no recorded exceedances of the well-specific control levels and compliance limits for Ammoniacal Nitrogen in groundwater during the last 4 years.
- 3.3.3 All Ammoniacal Nitrogen results are within the overall range of previously measured datasets and there is no evidence of deterioration of the groundwater quality with reference to this parameter.

Arsenic

- 3.3.4 **Appendices 2-4 to 2-6** present the results of Arsenic concentrations for the three groundwater monitoring locations.
- 3.3.5 There were no recorded exceedances of the well-specific control levels and compliance limits for Arsenic during the last 4 years, at any of the groundwater monitoring locations.

- 3.3.6 There are no apparent detrimental trends within any of the datasets for Arsenic, and all are within the overall range of the previously recorded results.

Extractable Petroleum Hydrocarbons (EPH)

- 3.3.7 **Appendices 2-7 to 2-9** present the results of EPH concentrations since 2003 at the three groundwater monitoring locations.
- 3.3.8 There have not been any recorded exceedances of the well-specific control levels and compliance limits for EPH within GW03_07 and the data does not indicate any significant deterioration of groundwater quality with reference to this parameter.
- 3.3.9 However, GW03_02 and GW03_05 show intermittent exceedances of the compliance limits for EPH. GW03_02 recorded exceedances in 2017 and 2018 with concentrations of 838ug/l and 263ug/l respectively, however the concentration returned to below the compliance limit in 2019. GW03_05 recorded an exceedance in 2018 and 2019 with concentrations of 191ug/l and 163ug/l, respectively. However, at both locations the concentrations recorded are within the range of the longer-term dataset.

Total Phenols

- 3.3.10 **Appendix 2-10** presents the concentrations of Total Phenols since 2003 at the groundwater monitoring locations. The concentration of Total Phenols in each of the monitoring wells in Area 1 have continued to be recorded below the MDL.

O-Xylene

- 3.3.11 **Appendix 2-11** presents the concentrations of O-Xylene since 2003 at the three groundwater monitoring locations. None of the results have exceeded the laboratory MDL over the last twelve years.
- 3.3.12 It is noted that the laboratory MDL was lowered in September 2011 (from 1.7µg/l to 1.0µg/l) which gives a false impression that some of the results in 2011 exceeded the compliance level, as the compliance level tracks the MDL.

Benzene, Mercury & Naphthalene

- 3.3.13 **Appendices 2-12 to 2-14** present the results of Benzene, Mercury & Naphthalene concentrations since commencement of monitoring.
- 3.3.14 The concentrations of Benzene, Mercury and Naphthalene recorded at the three compliance wells have remained below the MDL during the last 4 years.

Nickel and Potassium

- 3.3.15 **Appendices 2-15 to 2-17** present the concentrations of Nickel for the three groundwater monitoring locations.
- 3.3.16 There have been no exceedances of the well-specific compliance limits for Nickel in GW03_05 or GW07_07 during the last ten years
- 3.3.17 A Nickel concentration of 5.4µg/l was recorded in GW03_02 in November 2018, and this is above the well-specific compliance limit of 4.6µg/l. Nickel concentrations in GW03_02 have occasionally exceeded the compliance limit since commencement of monitoring and therefore the result is within the general dataset range and is not considered representative of significant groundwater deterioration.

3.3.18 **Appendices 2-18 to 2-20** present the concentrations of Potassium over time at the three current Area 1 groundwater monitoring locations. The concentrations recorded in compliance wells GW03_05 and GW07_07 have not exceeded the well-specific compliance limits since the start of monitoring, and only a single exceedance of the well-specific compliance limit has ever been recorded in GW03_02 (March 2010).

Chemical Oxygen Demand (COD) and Chloride

3.3.19 Appendix **2-21** presents the COD concentrations over time at the current Area 1 groundwater monitoring positions. The three data sets show generally steady trends (below 100mg/l) in the concentrations of COD since 2011. A slightly higher concentration of 258mg/l was recorded in GW03_02 in September 2017, with subsequent concentrations at this location recorded below 50mg/l.

3.3.20 Appendix **2-22** presents Chloride concentrations since 2003. The data indicates fluctuations in the concentrations of Chloride over the past four years at all the groundwater monitoring locations, although the results are within the ranges previously recorded since commencement of monitoring.

Electrical Conductivity and pH value

3.3.21 **Appendix 2-23** presents Electrical Conductivity (EC) readings since 2003. The readings at all three compliance wells in the last four years are within the overall dataset range, and there are no distinct adverse trends.

3.3.22 **Appendix 2-24** presents pH values over time at the current Area 1 groundwater monitoring positions. The three data series indicate results typically between pH 7 and pH 8 since early 2015, which is within the range of the overall dataset, and there are no distinct adverse trends.

3.4 Review of Potential Risks and Future Monitoring

3.4.1 The environmental data for groundwater quality indicates that the groundwater chemistry within the River Terrace Gravel is generally stable and that there is therefore no indication of a significant decline in groundwater quality since the previous Environmental Review. Many of the data trends are steady or fluctuating within the existing dataset range.

3.4.2 Since the previous AEPR there have been exceedances within the Area 1 groundwater of the well-specific compliance limits for EPH (twice at GW03_02 and twice at GW03_05) and Nickel (once at GW03_02). All exceedances are within the range of those previously measured.

3.4.3 Monitoring and reporting of the groundwater at the three compliance wells in Area 1 will continue annually, in accordance with the Closure Plan.

4 Leachate Monitoring

4.1 Leachate Control Measures

- 4.1.1 Leachate is monitored and sampled in Area 1 in accordance with Condition 69.1 of the Waste Management Licence and the aftercare monitoring plan. Although the waste body in Area 1 is unlined, it is capped with an engineered cap incorporating drainage layers above and below the impermeable cap material. Where encountered via the undercap drainage system, leachate from Area 1 is pumped to a leachate collection tank where it is temporarily stored before being emptied by tanker. Volumes of leachate removed from Area 1 in the last four years are presented in Table 4.1.

Table 4.1 – Leachate Extraction Data from Area 1

Period	Leachate Removed (kg)
January – December 2016	505,460
January – December 2017	748,000
January – December 2018	28,920
January – December 2019	670,900

4.2 Leachate Levels

- 4.2.1 Leachate levels in Area 1 are monitored and reported to NRW on a bi-annual basis. **Appendix 3-1** provides a summary of the leachate level data collected to date in all of the leachate monitoring wells. Table 4.2 shows the monitoring locations where leachate level has been routinely monitored over this reporting period. The locations of the leachate monitoring wells are shown on **Figure 2**.

Table 4.2 – Leachate Monitoring Locations

Monitoring Location	National Grid Reference	Notes
LF03_03	ST308853 (330788E, 185277N)	Adopted in 2019 by the Operator as part of the gas control system. No longer able to be monitored.
LF03_01	ST308855 (330804E, 185537N)	-
LF11_01	ST307857 (330652E, 185723N)	-
LF11_02	ST309858 (330896E, 185787N)	-
LF11_03	ST308854 (330764E, 185391N)	-
LF11_04	ST309852 (330884E, 185219N)	-
LF11_05	ST310853 (330963E, 185341N)	-
LF11_07	ST309856 (330921E, 185551N)	-

- 4.2.2 The highest leachate levels have been monitored in LF03_03 at around 22m Above Ordnance Datum (AOD).
- 4.2.3 Leachate levels in the monitoring wells have been relatively consistent within each well since commencement of monitoring. Within the last four years the levels of leachate have ranged between about 5.99mAOD (LF11_02) and 22.12mAOD (LF03_03).
- 4.2.4 The differences in leachate elevation in the monitoring wells across Area 1 suggest that there may be several separate discrete perched leachate bodies within different parts of the landfill.

Filling practices during the 1980s and 1990s would make this plausible since low permeability clay materials have been used within the waste to create discrete disposal zones and for daily cover purposes.

4.3 Leachate Chemistry

4.3.1 Samples of leachate were taken regularly from LF03_04 since the early 2000s and from LF11_02, LF11_04 and LF11_07 since their installation in 2012 on a generally quarterly basis until closure and then annually since closure. The testing suite has previously been agreed with NRW and details are provided in the Monitoring Plan for Area 1^[1].

4.3.2 In June 2014, LF03_04 became blocked and LF11_05 was adopted as a replacement. The graphs referenced in the following section therefore include the historical data from LF03_04 but commentary on that data is not included in this report as it has been previously reviewed and commented on.

Ammoniacal Nitrogen

4.3.3 **Appendix 3-2** presents the results of Ammoniacal Nitrogen concentrations in the leachate monitoring wells since commencement of monitoring.

4.3.4 The data shows that the respective concentrations within the monitoring wells are relatively consistent with no distinct trends apparent. Concentrations vary between about 400mg/l in LF11_02 and 2000mg/l in LF11_04

Arsenic

4.3.5 **Appendix 3-3** presents the results of Arsenic concentrations in the leachate monitoring wells since commencement of monitoring.

4.3.6 The data indicates that the respective concentrations recorded in LF11_02 and LF11_04 are relatively consistent with no distinct trends and concentrations predominantly recorded below 20mg/l in the last four years.

4.3.7 At LF11_07, concentrations have fluctuated in the last four years between about 1mg/l and 55mg/l. The data from LF11_05 also indicates fluctuating concentrations between about 27mg/l and 80mg/l. At the current time there are no distinct trends apparent.

Benzene, Mercury, and Naphthalene

4.3.8 **Appendix 3-4** presents the Benzene concentrations in the leachate monitoring wells since commencement of monitoring. The data indicates consistent trends within the dataset for each monitoring well with no apparent adverse trends, but the concentrations recorded vary between about 5ug/l and 12ug/l generally, with concentrations up to 20ug/l recorded in LF11_05.

4.3.9 **Appendix 3-5** presents the Mercury concentrations in the leachate monitoring wells since commencement of monitoring. Mercury concentrations within the leachate monitoring wells indicate stable trends with all results below the MDL at all locations.

4.3.10 **Appendix 3-6** presents the Naphthalene concentrations in the leachate monitoring wells since commencement of monitoring. Concentrations of Naphthalene are generally consistent within individual monitoring wells between monitoring events, with all results generally below 20µg/l. The exception to this is LF11_05 where concentrations have been recorded between 8ug/l and 156ug/l in the last 4 years.

o-Xylene, Extractable Petroleum Hydrocarbons (EPH), and Total Phenols

- 4.3.11 **Appendix 3-7** presents the results of o-Xylene concentrations in the leachate monitoring wells. The results show that the o-Xylene concentrations recorded indicate a consistent trend, with concentrations predominantly recorded below 20ug/l in the last four years. The exception is LF11_05 where concentrations up to 34ug/l have been recorded in the last four years.
- 4.3.12 **Appendix 3-8** presents the results of EPH concentrations in leachate monitoring wells LF03_03, LF03_04, LF11_02, LF11_04 and LF11_07. The concentrations recorded in the period 2016 to 2019 are consistent with previous results and are all less than 15,000µg/l with the exception of a concentration of 134,000µg/l (134mg/l) recorded in LF11_07 in 2017 which subsequently reduced to 13,300µg/l in the sample obtained in 2018.
- 4.3.13 **Appendix 3-9** presents the results of EPH concentrations in LF11_05, which replaced leachate well LF03_04 when it became blocked in 2014. The concentration of EPH was recorded as 45,700mg/l in 2016, 1,160,000mg/l in 2017, reducing to 3,700mg/l in 2018 and 137mg/l in 2019. These concentrations are significantly higher than the EPH concentrations recorded in the other leachate monitoring wells. This has previously been reported and discussed in the annual monitoring reports.
- 4.3.14 **Appendix 3-10** presents the results of Total Phenol concentrations in the leachate monitoring wells in Area 1. The results recorded since 2014 are generally stable and typically less than 0.2mg/l with occasional concentrations (in LF11_05) recorded up to 0.6mg/l.

Nickel and Potassium

- 4.3.15 **Appendices 3-11** and **3-12** present the concentrations of Nickel and Potassium in the four leachate monitoring wells.
- 4.3.16 The results indicate that Nickel concentrations are relatively consistent (below 50µg/l) in LF11_02. However, in the remaining monitoring wells the results have fluctuated between circa and 13µg/l and 570µg/l in the period 2016 to 2019.
- 4.3.17 The concentrations of Potassium recorded in the leachate are relatively consistent within each monitoring well since commencement of monitoring, with concentrations typically between about 200ug/l (LF11_02) and 1000µg/l (LF11_04). There are no distinct adverse trends.

4.4 Review of Potential Risks and Future Monitoring

- 4.4.1 The environmental data for leachate indicates that in general the leachate chemistry has been consistent in leachate wells LF11_02, LF11_04, and LF11_07 in the last four years.
- 4.4.2 Many of the dataset trends are consistent with previous monitoring rounds.
- 4.4.3 The leachate chemistry data for LF11_05 indicates greater fluctuations and often higher concentrations of parameters than the other monitoring wells.
- 4.4.4 Further to the significantly elevated concentrations of EPH recorded at LF11_05 in 2016 and 2017, the concentrations of EPH at this location have reduced significantly on each subsequent monitoring round, to 137mg/l in 2019. This concentration remains higher than the concentrations generally recorded in the other leachate monitoring wells.
- 4.4.5 The leachate levels in Area 1 have been consistent over the monitoring period of this report.
- 4.4.6 Leachate in Area 1 will continue to be pumped to the collection tank and periodically removed from site by tanker.

5 External Landfill Gas Monitoring

5.1 Gas Monitoring Locations

5.1.1 There are currently thirteen gas monitoring boreholes located around Area 1, drilled specifically to enable gas monitoring external to the Area 1 licenced area. Table 5.1 contains details of the coordinates of the current external gas monitoring points, with their respective positions shown on **Figure 2**.

Table 5.1 – Area 1 Landfill Gas Monitoring Boreholes (external)

Gas Monitoring Borehole	National Grid Reference
NCC1	ST303858 (330336E,185808N)
NCC2	ST310857 (331011E,185740N)
NCC3	ST310857 (331020E,185717N)
NCC5	ST311855 (331094E,185486N)
NCC6	ST311856 (331054E,185612N)
GP03_01	ST306857 (330586E,185697N)
GP03_02	ST308858 (330783E,185814N)
GP03_3A	ST309859 (330945E,185862N)
GP03_13	ST308858 (330775E,185810N)
GP09_09	ST307853 (330683E,185349N)
GP07_05A	ST311853 (331116E,185290N)
GP12_26	ST311853 (331112E,185332N)
GP12_27	ST308851 (330827E,185146N)

5.2 Monitoring Requirements and Trigger Levels

- 5.2.1 In accordance with Condition 60 of the WML Landfill gas monitoring was undertaken on a monthly basis until formal closure of the site in October 2014 when the site moved into the aftercare phase and the frequency of monitoring was reduced to bi-annually in accordance with the closure plan.
- 5.2.2 Trigger Levels for landfill gas monitoring are presented in Table 60C of the WML, being >1% for methane, >1.5% for carbon dioxide and <18% for oxygen. Table 60D of the WML stipulates that monitoring results should be reviewed against Trigger Levels.

5.3 External Landfill Gas Monitoring

Methane

5.3.1 **Appendix 4-1** presents the results of methane concentrations since the commencement of the landfill gas monitoring programme in 2003 and includes the thirteen current monitoring locations. Methane has been recorded in excess of the Trigger Level (1%) at the majority of monitoring locations throughout the monitoring programme. During the last four years methane has been recorded between <1%v/v and 73.1%v/v which is consistent with previous years.

Carbon Dioxide

- 5.3.2 **Appendix 4-2** presents the results of carbon dioxide concentrations since the commencement of the landfill gas monitoring programme in 2003, including the current thirteen monitoring locations. Carbon dioxide has generally been recorded in excess of the Trigger Level (1.5%) at the majority of monitoring locations throughout the monitoring programme. During the last four years carbon dioxide has been recorded between 0.2% and 24.6%, which is consistent with previous years.

Oxygen

- 5.3.3 **Appendix 4-3** presents the results of oxygen concentrations since the commencement of the landfill gas monitoring programme in 2003, including the current thirteen monitoring locations. Oxygen content is typically recorded below the Trigger Level of 18% (i.e. it is depleted) at the majority of monitoring locations throughout the monitoring programme. During the last four years Oxygen has been recorded between 0.3% and 21.0%, which is consistent with previous years.

5.4 Review of Potential Risks and Future Monitoring

- 5.4.1 The results of gas monitoring undertaken during the last four years reveal that there are no new adverse trends in the environmental monitoring data and therefore it is not considered that there is a significant increase in potential landfill gas risk since the previous Environmental Review.
- 5.4.2 We have described previously that the wells external to the Area 1 licenced area are considered as being inappropriate for 'external' gas monitoring. This is because deposition of waste has historically taken place over a wide area outside the limits of the current licenced boundary, with biodegradable refuse present in the soil into which the majority of these gas monitoring positions have been installed. As such, the origin of the gas measured at these locations is questionable and may be representing ongoing degradation within the local soil conditions, as opposed to representing gas which has migrated from the licenced area of the landfill.
- 5.4.3 Definitive closure for Area 1 at Docksway Disposal Site was obtained in October 2014. Monitoring of landfill gas in Area 1 will continue in accordance with the closure plan.

6 Landfill Gas Generation and Usage

6.1 Landfill Gas Utilisation Plant

- 6.1.1 Docksway Disposal Site has a Landfill Gas Utilisation Plant servicing both Area 1 and Area 2 landfill areas. It currently comprises one 1MW Jenbacher (320) engine together with one 1250m³/hr flare. Information from Infinis Energy indicates that the plant capacity was reduced in January 2014, with a 330kW Jenbacher (208) engine removed as a result of a reduction in gas availability at the site.
- 6.1.2 Infinis Energy are currently responsible for the general running and minor routine maintenance of the gas plant and has provided information to assist in the compilation of this section of the report. The Infinis annual report is presented as **Appendix 5**. The annual reports for the prior years have been submitted previously to NRW as part of the annual environmental performance reports for Area 2, and also separately, directly by Infinis.
- 6.1.3 Monitoring of the plant performance and volumes of gas extracted from the gas utilisation plant has been undertaken on a regular basis since 2005 by Novera/Infinis.

6.2 Landfill Gas Extraction

- 6.2.1 The total production of energy from the Landfill Gas Utilisation Plant in each of the last four years is given in Table 5.1 below.

Table 6.1 - Landfill Gas Utilisation Statistics

Year	Total production of energy	Energy Exported (MWh)	Site Efficiency (%)	Engine Operation (Hours)	Engine Downtime (Hours)	Flare Operation (Hours)
2016	5669	7306	29.7	8088	672	5941
2017	7443	7716	33.5	8072	688	667
2018	5938	5669	33.0	7987	773	778
2019	5126	4864	30.9	7798	962	1107

- 6.2.2 As can be seen from Table 5.1 the total production of energy, amount of energy exported and the site efficiency have reduced each year since 2017. Since 2016 the engine has operated for fewer hours each year, with engine downtime also increasing. However, flare operation has increased since 2017. A review of the volumes of gas processed shows a significant decrease in the volume combusted by engine in 2019 vs. 2018 (2.9 million m³ vs. 3.5 million m³) and a corresponding increase in volume combusted by flare in 2019 vs. 2018 (484,000m³ vs. 342,000m³).
- 6.2.3 Infinis have indicated that the flare is operated during periods when the engine is down for maintenance or during a period of surplus landfill gas production.
- 6.2.4 Environmental Performance Indicators provided by Infinis are summarised in Table 5.2 below.

Table 6.2 - Environmental Performance Indicators (provided by Infinis)

Year	Total oxides of Nitrogen emission as NO ₂ (kg/MWh)	Total Carbon Monoxide Emissions (kg/MWh)	Total Engine Downtime (%)
2016	2.0	4.4	7.7
2017	1.2	4.1	8.8
2018	2.1	4.6	8.8
2019	7.8	15.7	11.0

6.2.5 As can be seen from Table 5.2, the environmental indicator parameters were relatively similar between 2016 and 2018, however the 2019 data indicates an increase in all parameters. Emissions data critically depends on a number of factors including run hours of engines and the availability of landfill gas to them, and whilst they are presented as EPI they should be treated with caution.

6.3 Monitoring of Extracted Gas

6.3.1 The PPC Permit (LP3135SB) for the gas installation at the site requires that ‘emissions to air from the engine stacks, fugitive emissions, and odour are monitored and reported annually’. This data is collated and presented directly to NRW by Infinis Energy.

6.3.2 Flare monitoring is only required if the flare is in operation greater than 10% of the time. Infinis have indicated that emissions testing of the flare was not carried out in 2017, 2018 or 2019 as the flare hours did not exceed the 10% trigger level (in the preceding 12-month period).

6.3.3 Monitoring and reporting will continue by Infinis in accordance with the PPC Permit and the WML.

7 Annual Production / Treatment and Performance Parameters

7.1 Annual Production/Treatment

Table 7.1 – Annual production/treatment reported by NCC and Infinis (Landfill gas)

Leachate:	Tonnes/year			
	2016	2017	2018	2019
Disposed of off-site (Area 1)	506	748	29	671
Disposed of to any onsite effluent treatment plant	None	None	None	None
Re-circulated into the waste mass	None	None	None	None
Surface water and/or groundwater:	Cubic metres/year			
	2016	2017	2018	2019
Disposed of off site	n/a	n/a	n/a	n/a
Disposed of to any onsite effluent treatment plant	None	None	None	None
Landfill Gas: (Whole site)	Normalised cubic metres/year			
	2016	2017	2018	2019
Combustion in flares	809,640	327,098	342,557	484,812
Combustion in gas engines	3,763,344	3,959,712	3,516,712	2,953,545
Other methods of gas utilisation	None	None	None	None

7.2 Performance Parameters

Table 7.2 – Performance parameters reported by NCC (Whole site)

Parameter	Year	Annual Total	Unit
Potable Water Use (Annual)	2016	3,158	Cubic metres
	2017	3,136	
	2018	1,558	
	2019	1,637	
Energy Used (including for leachate treatment, excluding electricity generated) (Annual)	2016	163,591	kWh of electricity
	2017	182,323	
	2018	195,120	
	2019	178,666	
Non-Potable Water Use (Annual)	2016	0	Cubic metres
	2017	0	
	2018	0	
	2019	0	

7.3 Topographic Surveys

A review of the annual topographical surveys across Area 1 during the reporting period 2016 to 2019 indicates that generally the waste mass appears to be gradually settling as anticipated. However, there are irregularities between the surveys that indicate localised areas where the ground levels appear to have increased. Newport City Council have confirmed that the reasons for these apparent ground level increases are due to inconsistencies and errors in the surveys, and they are committed to improving the survey coverage and control for future surveys.

8 Conclusions

8.1 Assessment of Environmental Performance Trends

- 8.1.1 This document reviews the environmental data from the four-year period 2016 to 2019, compares it to the long-term data and provides an indication of data trends both over the last four years and since the various monitoring programmes commenced.
- 8.1.2 Surface water monitoring indicates generally relatively stable trends since the previous Environmental Performance Review, with no evidence of significant adverse trends developing. SW25 and SW26 are subject to discharge consents and across the last four years have not exceeded the discharge consent limits. On the basis of the data available, it is considered that there has been no significant deterioration of the surface water quality in the last four years.
- 8.1.3 The environmental data for groundwater quality indicates that there have been a limited number of exceedances of the well-specific compliance as described in Section 3. All exceedances are within the range of concentrations previously recorded. The groundwater chemistry within the River Terrace Gravel appears generally stable and the data indicates that there is therefore no significant decline in groundwater quality since the previous Environmental Review.
- 8.1.4 Leachate levels across Area 1 appear to be indicating the presence of discrete perched leachate bodies within different parts of the landfill, and recorded levels are relatively consistent with no distinct trends.
- 8.1.5 The leachate chemistry data indicates generally stable or indistinct trends in the leachate wells across Area 1, although concentrations of some parameters in LF11_05 are notably higher and/or indicate greater fluctuations than the other monitoring wells. The previously elevated concentrations of EPH recorded in LF11_05 in 2016 appear to have significantly reduced although they remain higher than the concentrations recorded in the other leachate monitoring wells.
- 8.1.6 The external landfill gas monitoring data indicates that the concentrations of Methane and Carbon Dioxide have consistently exceeded the relevant Trigger Levels since 2003 whilst concentrations of Oxygen have consistently been recorded below the required Trigger Level over the same period. These are consistent data trends.

8.2 Future Monitoring Requirements

- 8.2.1 The application for 'definitive closure' of Area 1 at Docksway Disposal Site, and the associated Closure Plan was accepted by NRW in October 2014.
- 8.2.2 The Docksway Disposal Site Area 1 monitoring programmes will continue (as approved by NRW) in accordance with the aftercare monitoring plan.

9 References

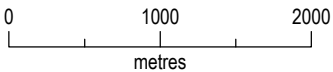
- [1] PBA (2011) Docksway Disposal Site, Newport. 2011 Monitoring Plan for Area 1. Peter Brett Associates, August 2011.

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This report has been prepared within an agreed timeframe and to an agreed budget that will necessarily apply some constraints on its content and usage. The remarks below are presented to assist the reader in understanding the context of this report and any general limitations or constraints. If there are any specific limitations and constraints they are described in the report text.

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7. Public or legal consultations or enquiries, or consultation with any Regulatory Bodies (such as Natural Resources Wales, Natural England or Local Authority) have taken place only as part of this work where specifically stated.

Figures



Site Grid Ref: ST 309 852

**DOCKSWAY DISPOSAL SITE
NEWPORT**

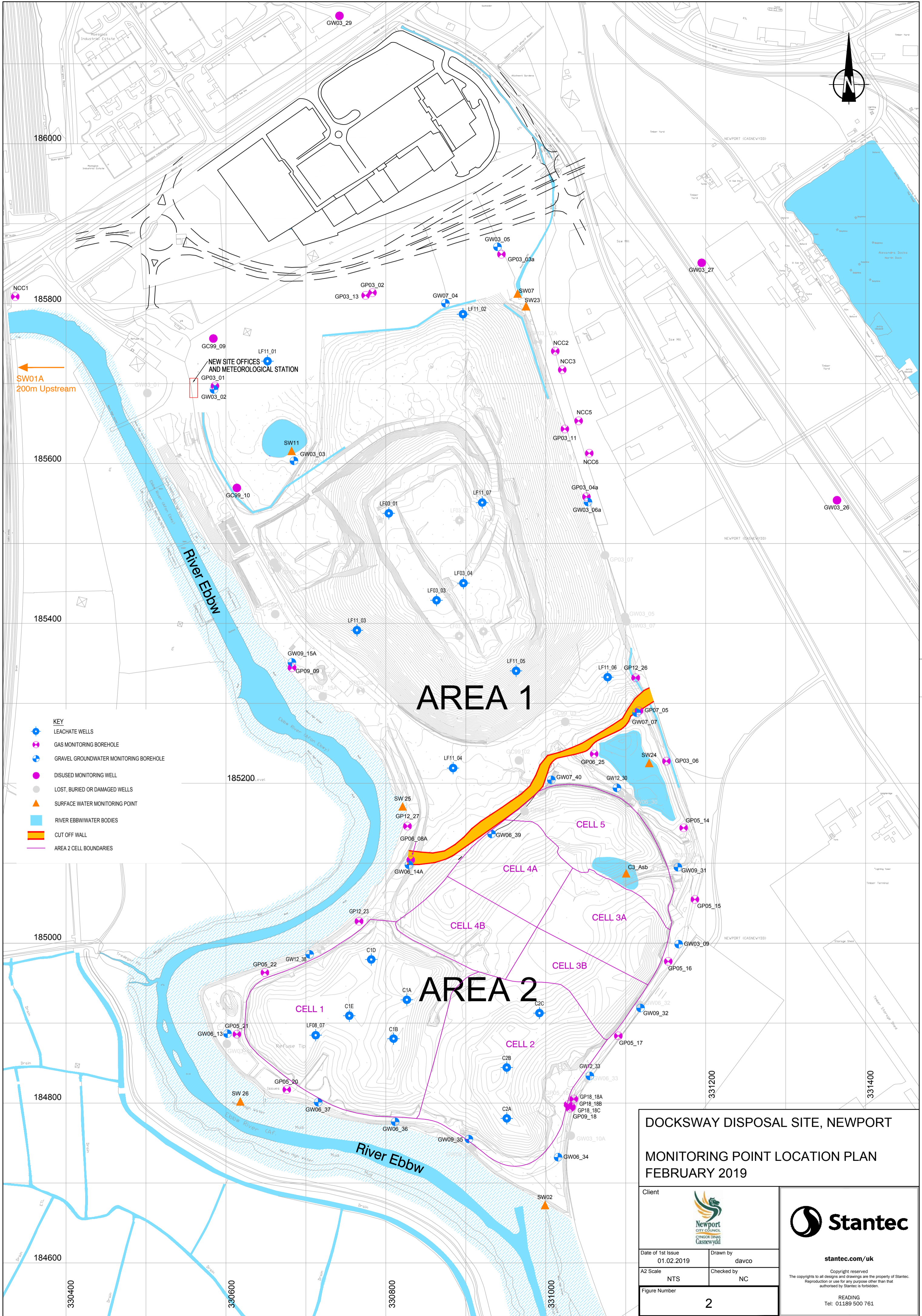
SITE LOCATION PLAN

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- KEY**
- LEACHATE WELLS
 - GAS MONITORING BOREHOLE
 - GRAVEL GROUNDWATER MONITORING BOREHOLE
 - DISUSED MONITORING WELL
 - LOST, BURIED OR DAMAGED WELLS
 - ▲ SURFACE WATER MONITORING POINT
 - RIVER EBBW WATER BODIES
 - CUT OFF WALL
 - AREA 2 CELL BOUNDARIES

DOCKSWAY DISPOSAL SITE, NEWPORT
MONITORING POINT LOCATION PLAN
FEBRUARY 2019

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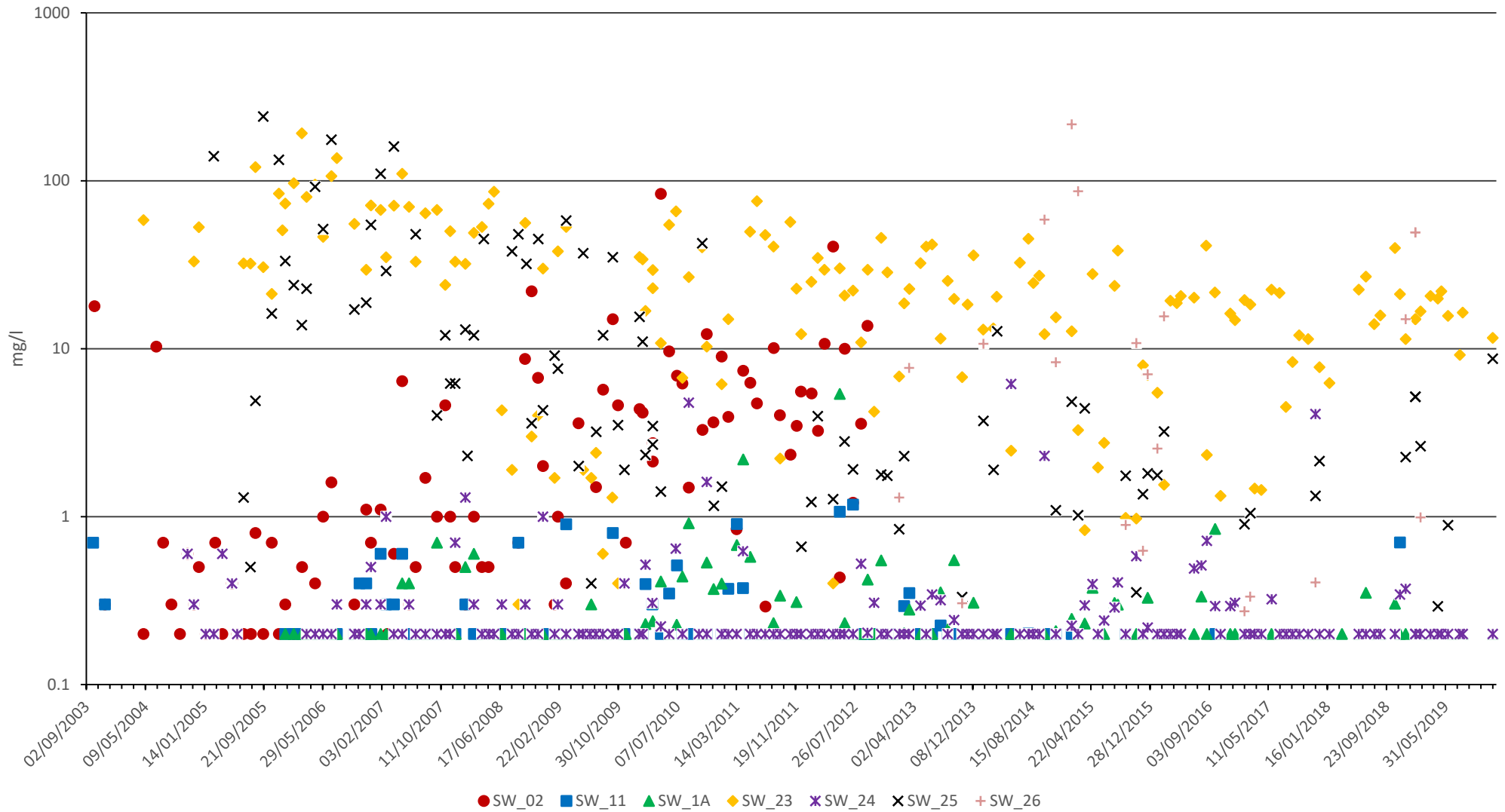


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Appendix 1 Surface Water Graphs



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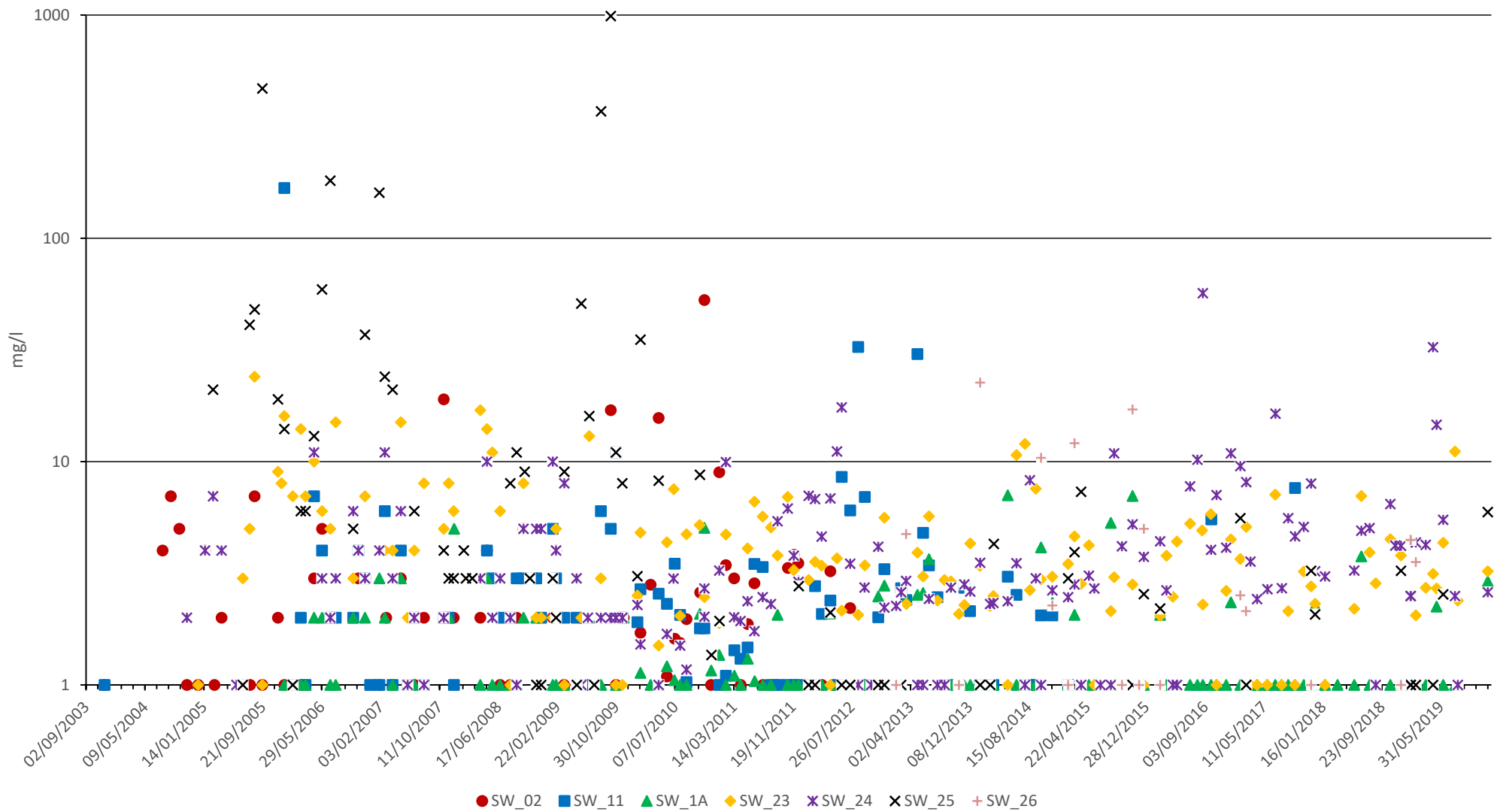
Docksway Disposal Site

Ammonical Nitrogen in Surface Water

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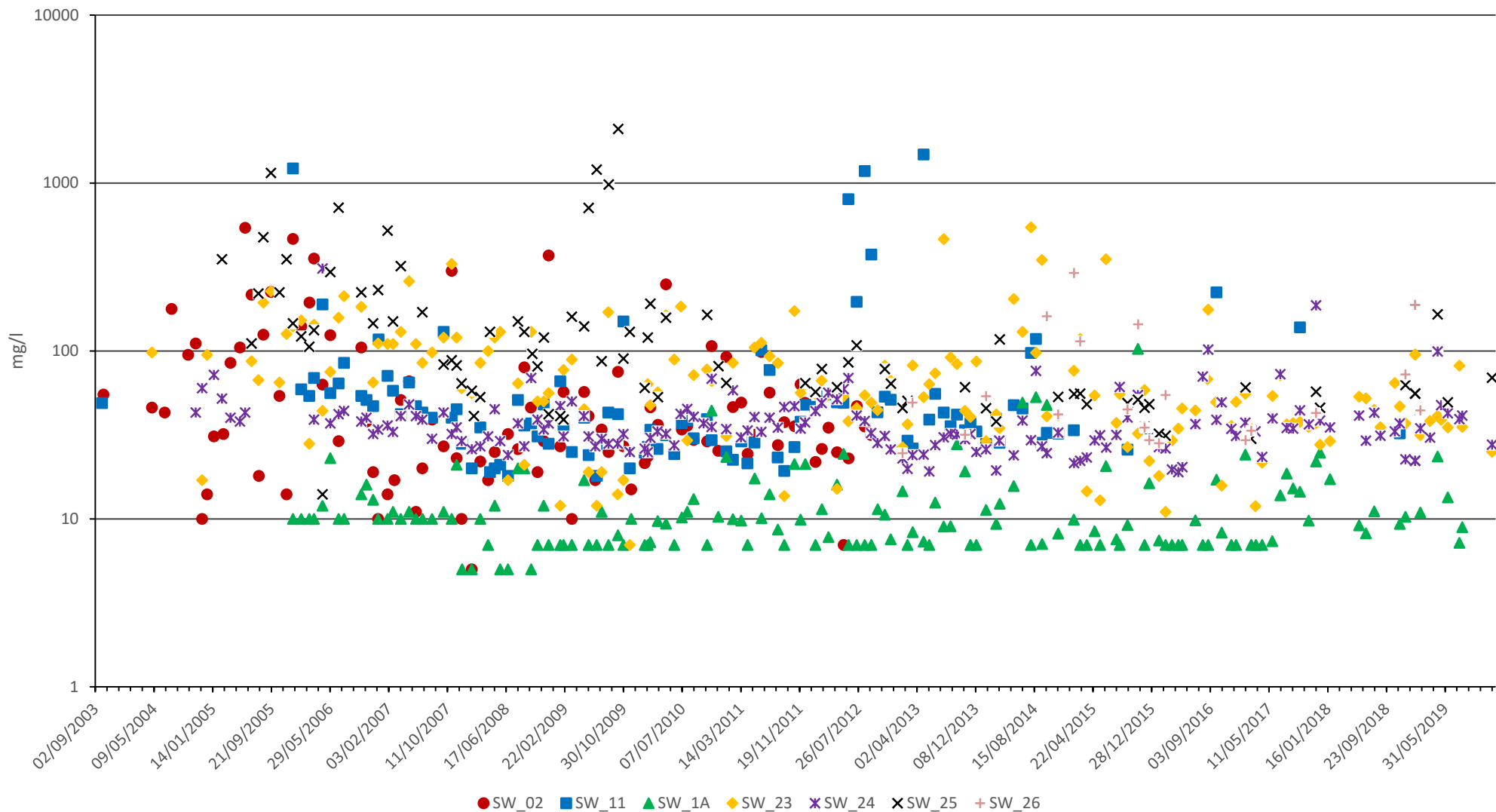
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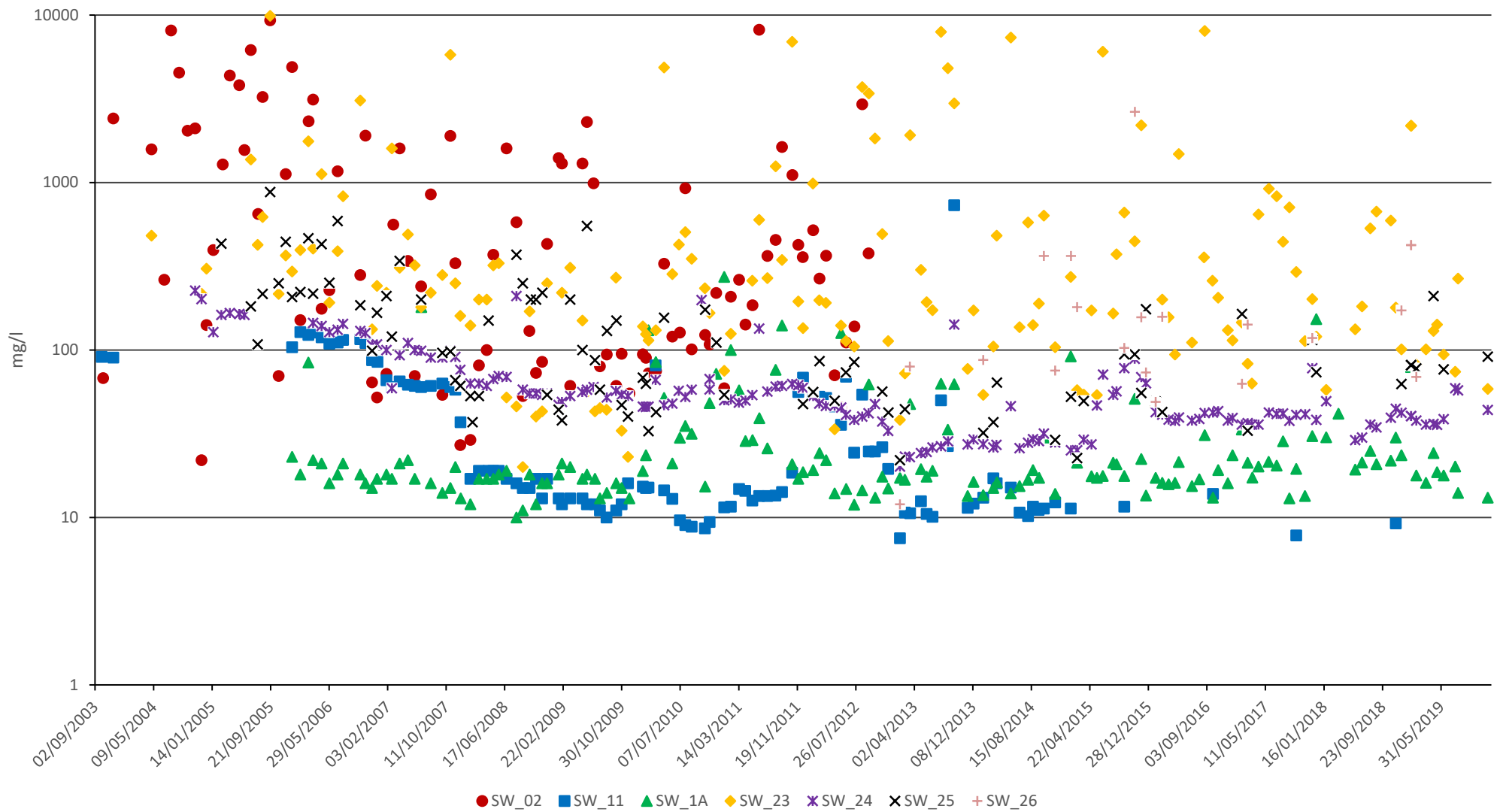
Biochemical Oxygen Demand in Surface Water

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Appendix

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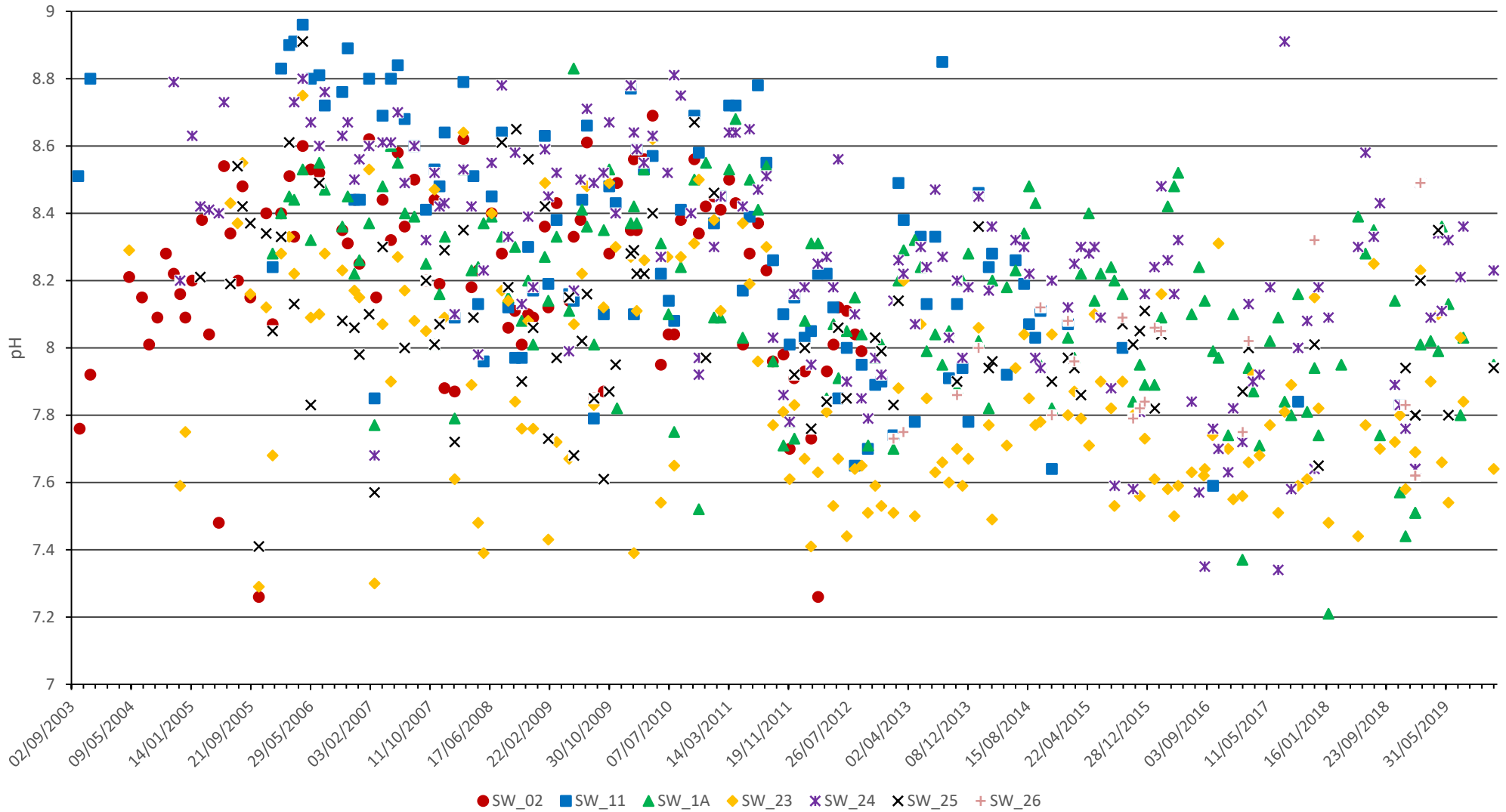
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Docksway Disposal Site
Chloride in Surface Water

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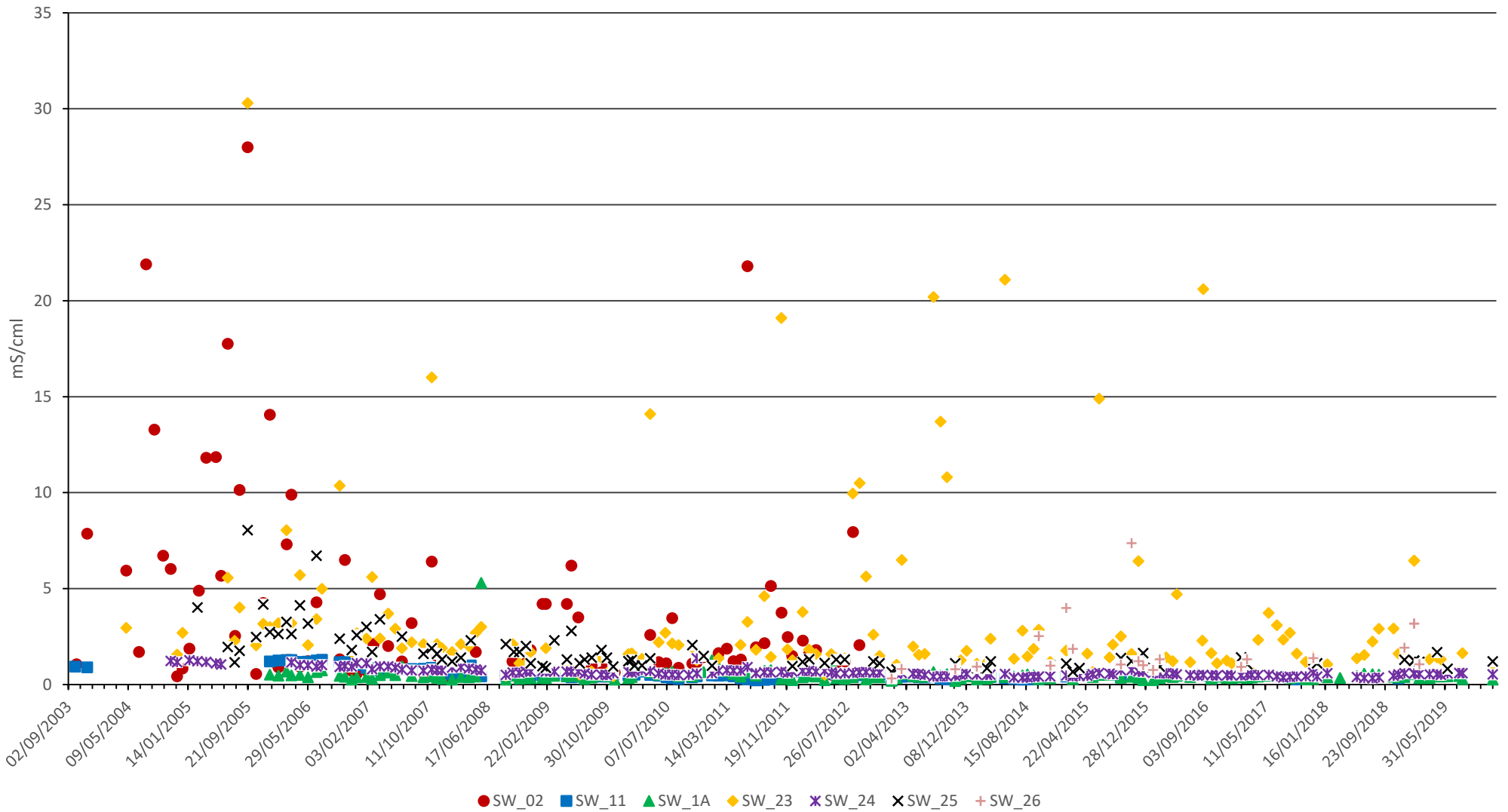
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pH in Surface Water

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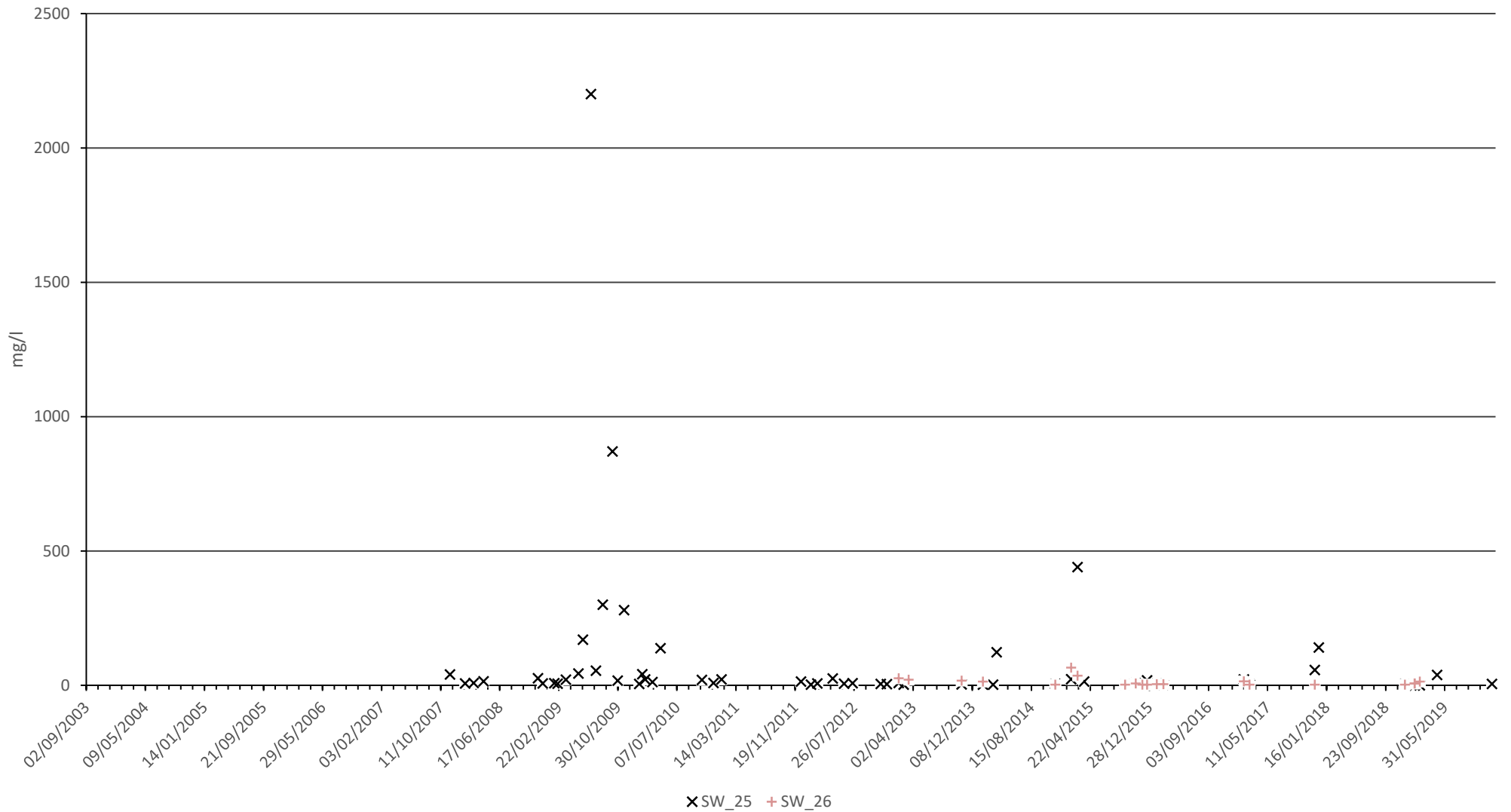
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Electrical Conductivity in Surface Water

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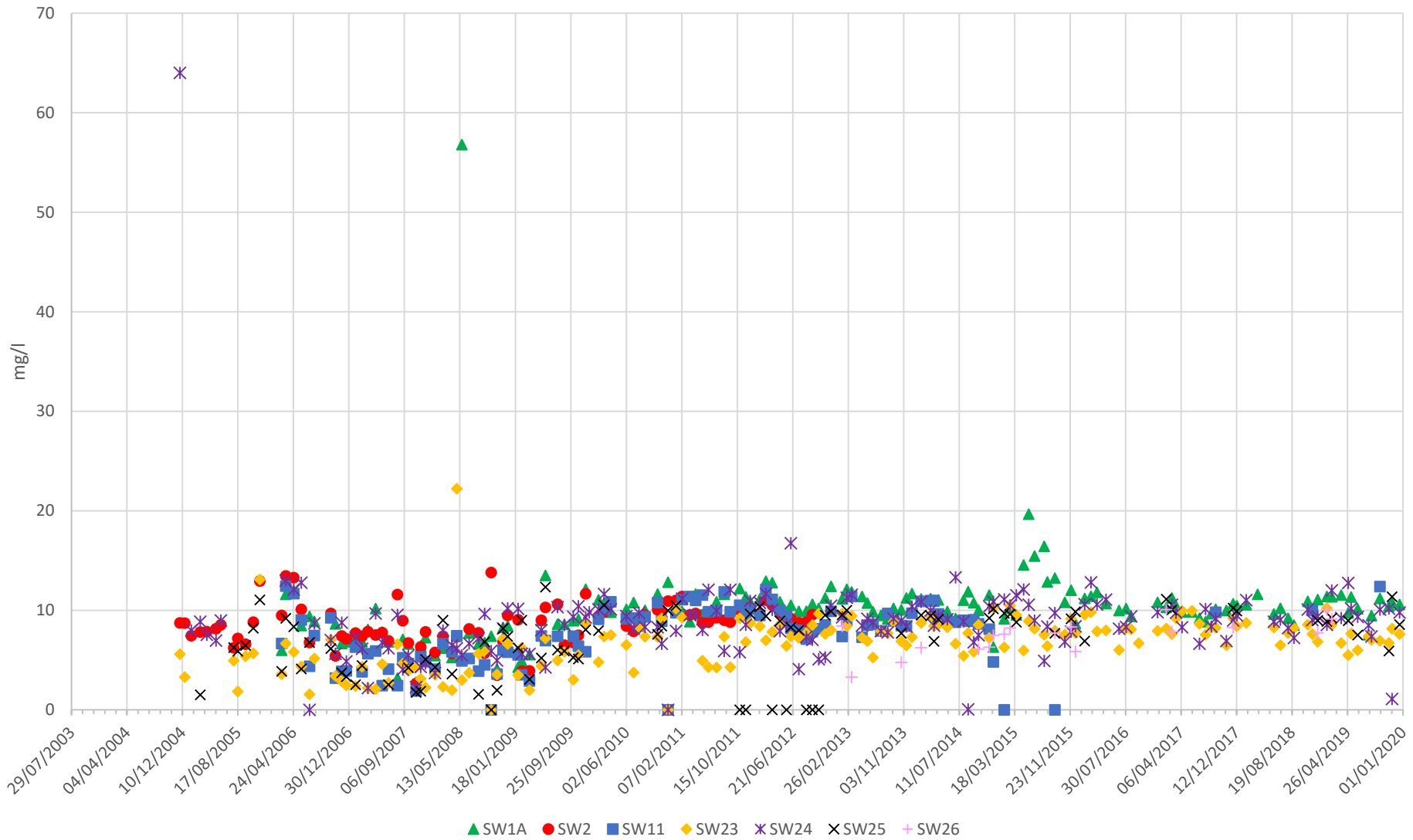
Docksway Disposal Site

Total Suspended Solids in Surface Water

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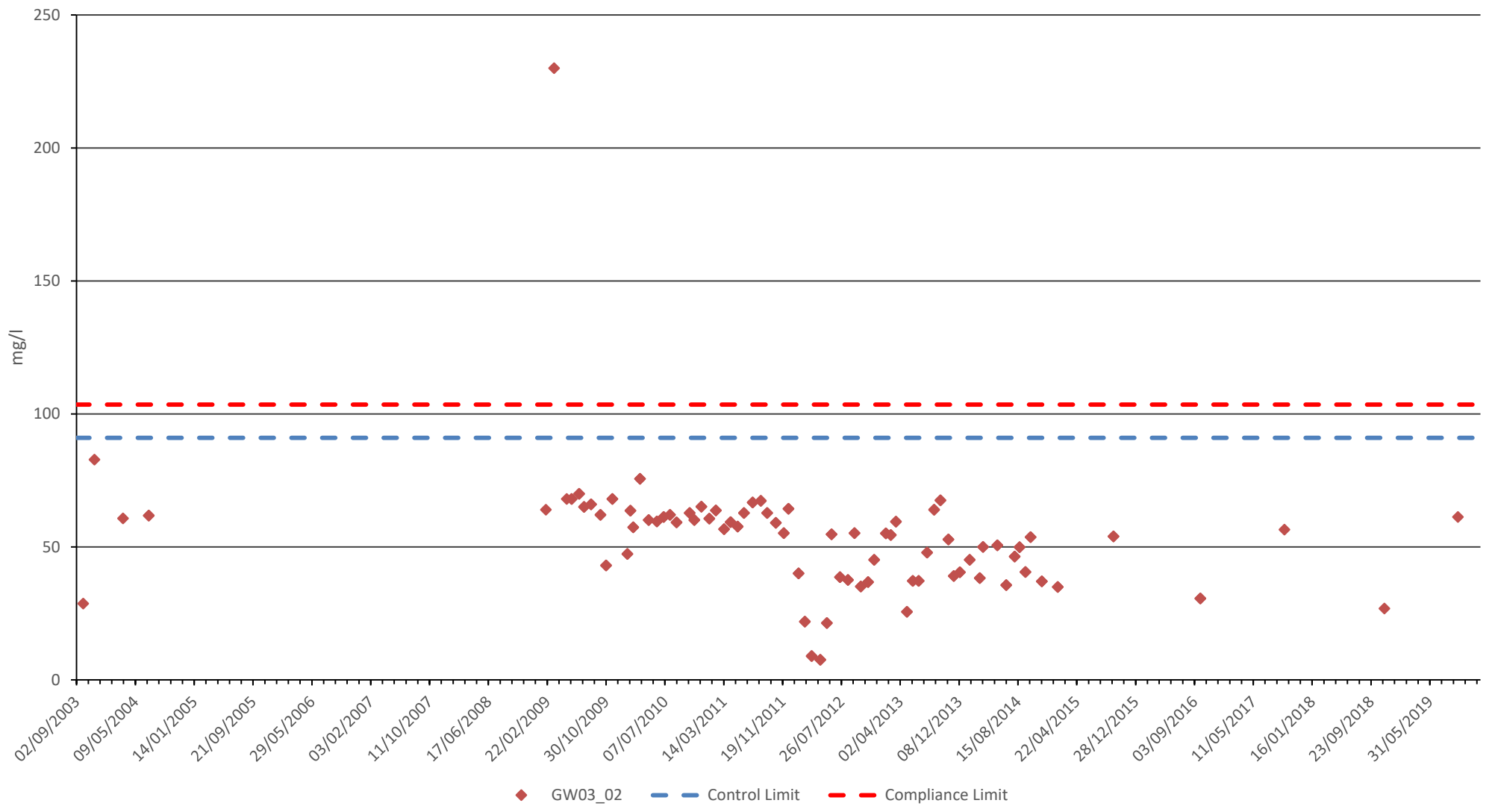
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Appendix

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Appendix 2 Groundwater Graphs



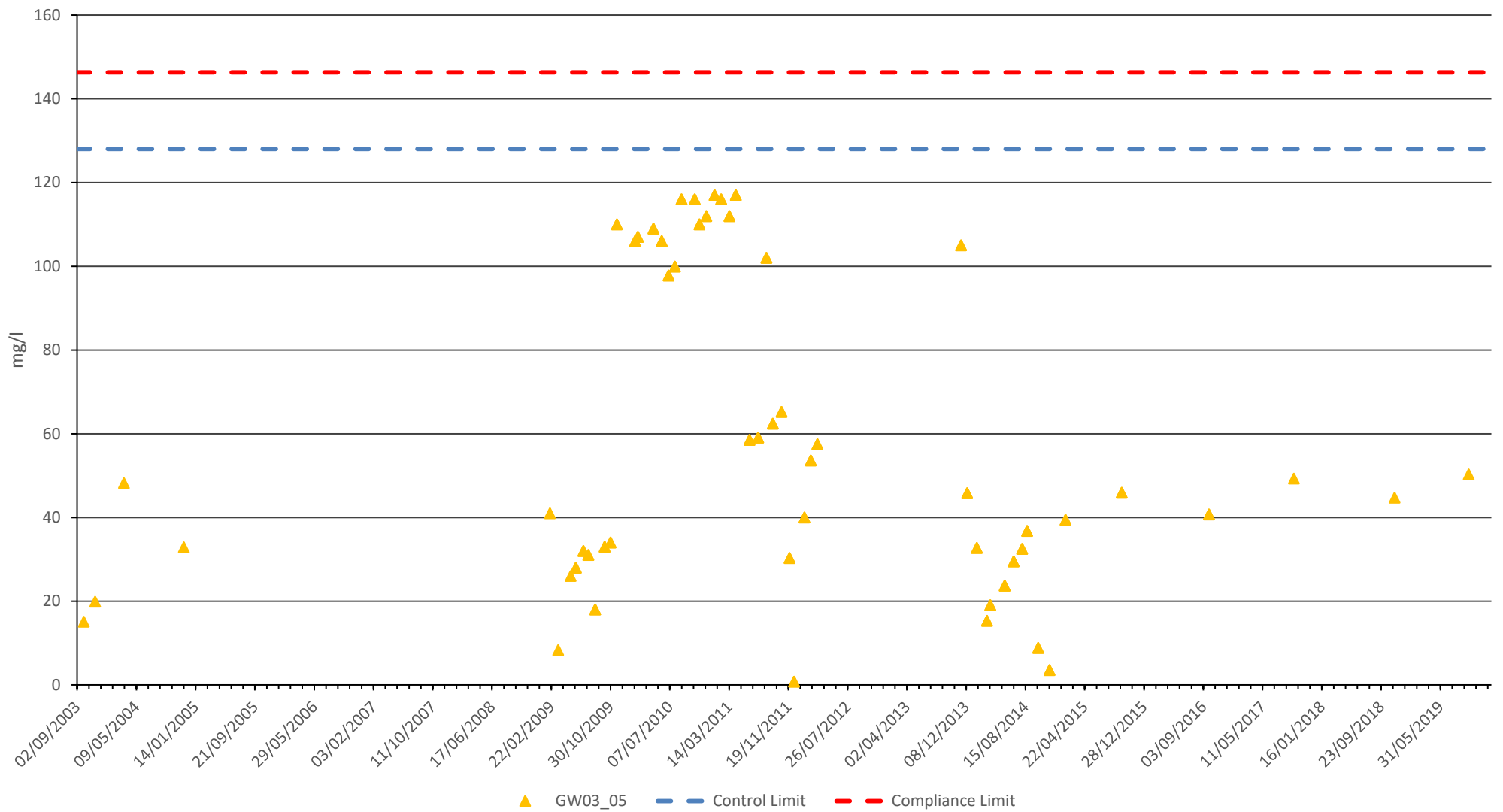

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Docksway Disposal Site
Ammoniacal Nitrogen in Groundwater

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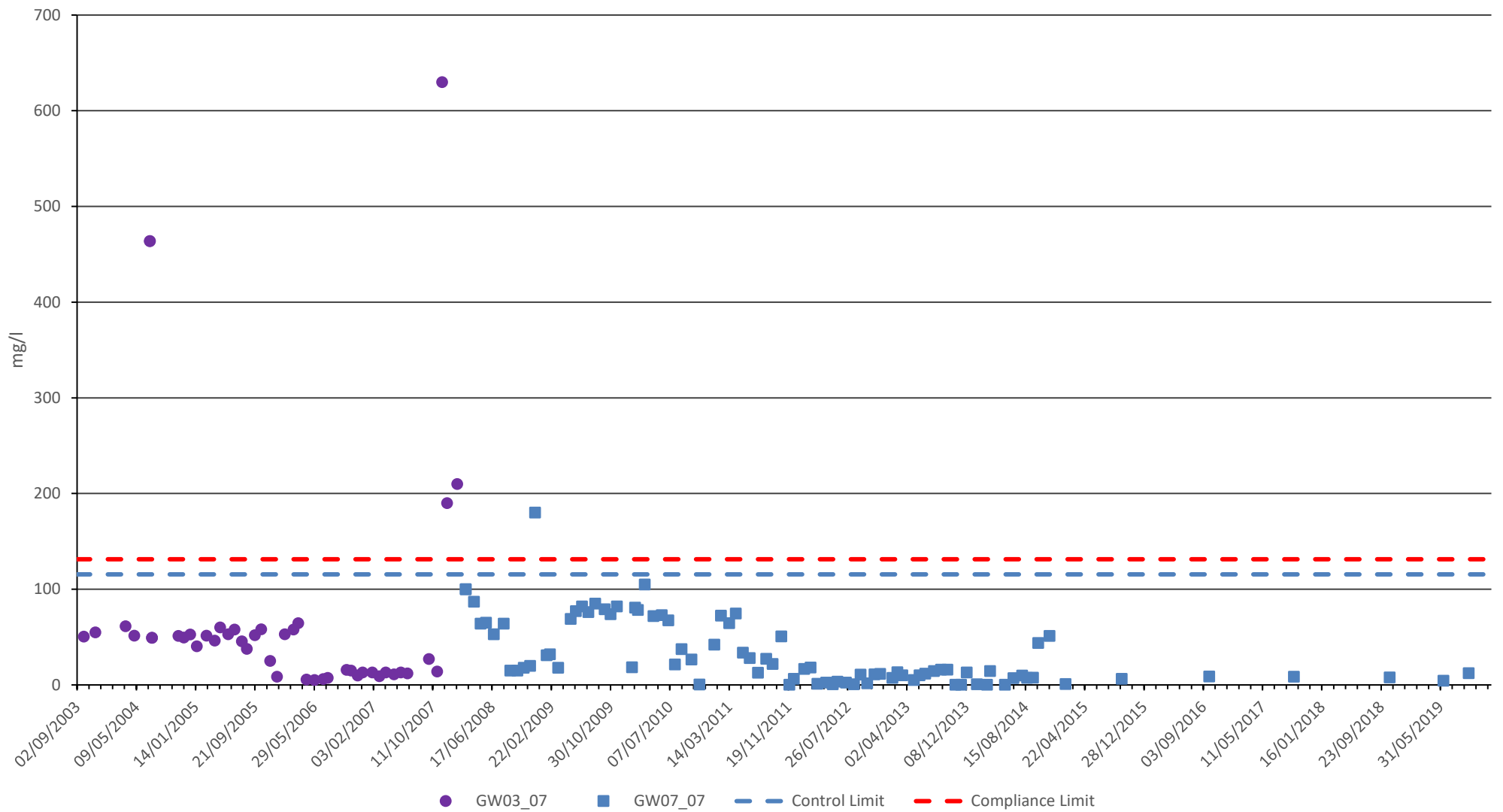
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Ammoniacal Nitrogen in Groundwater

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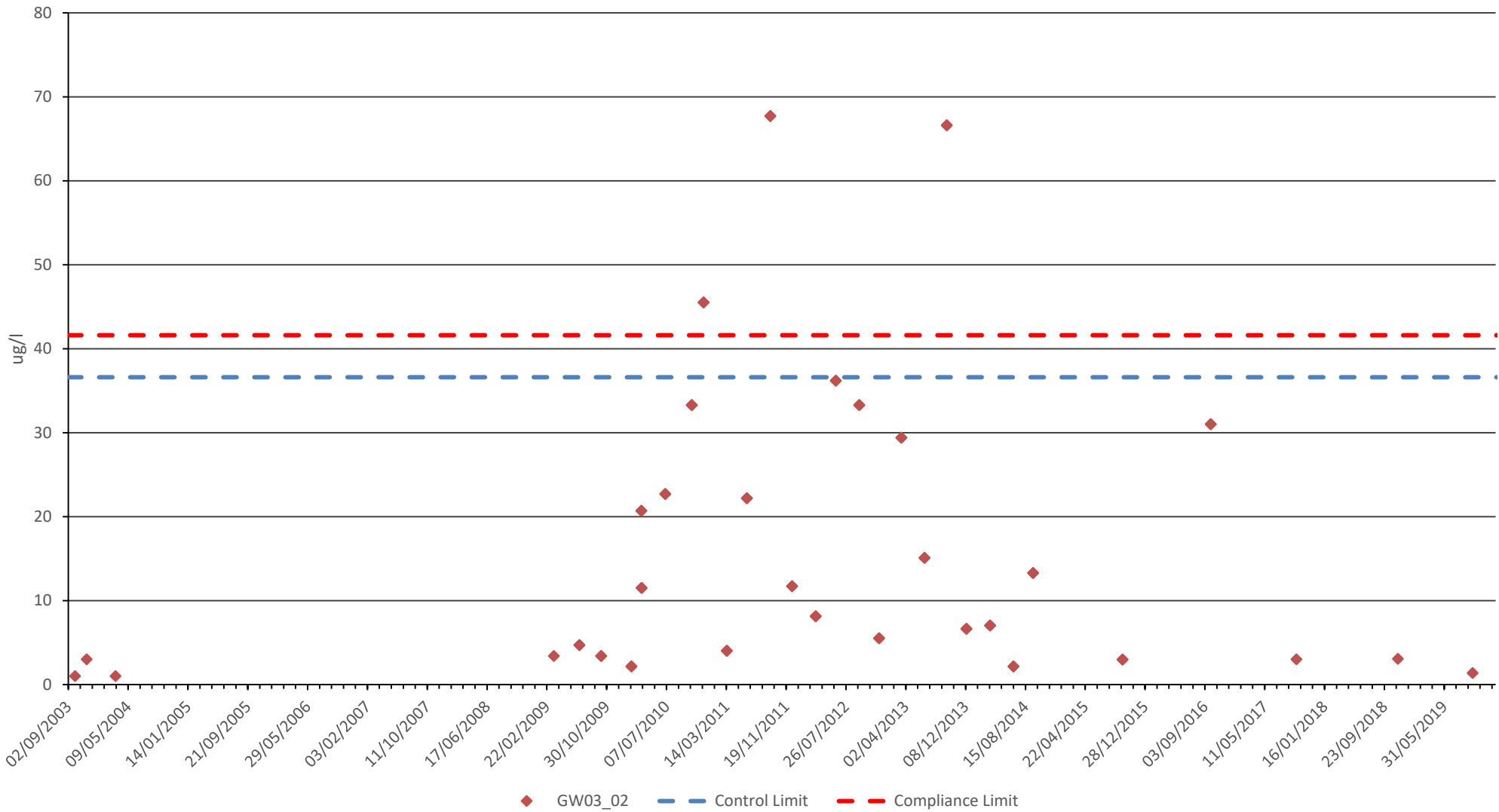

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Ammoniacal Nitrogen in Groundwater

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Appendix
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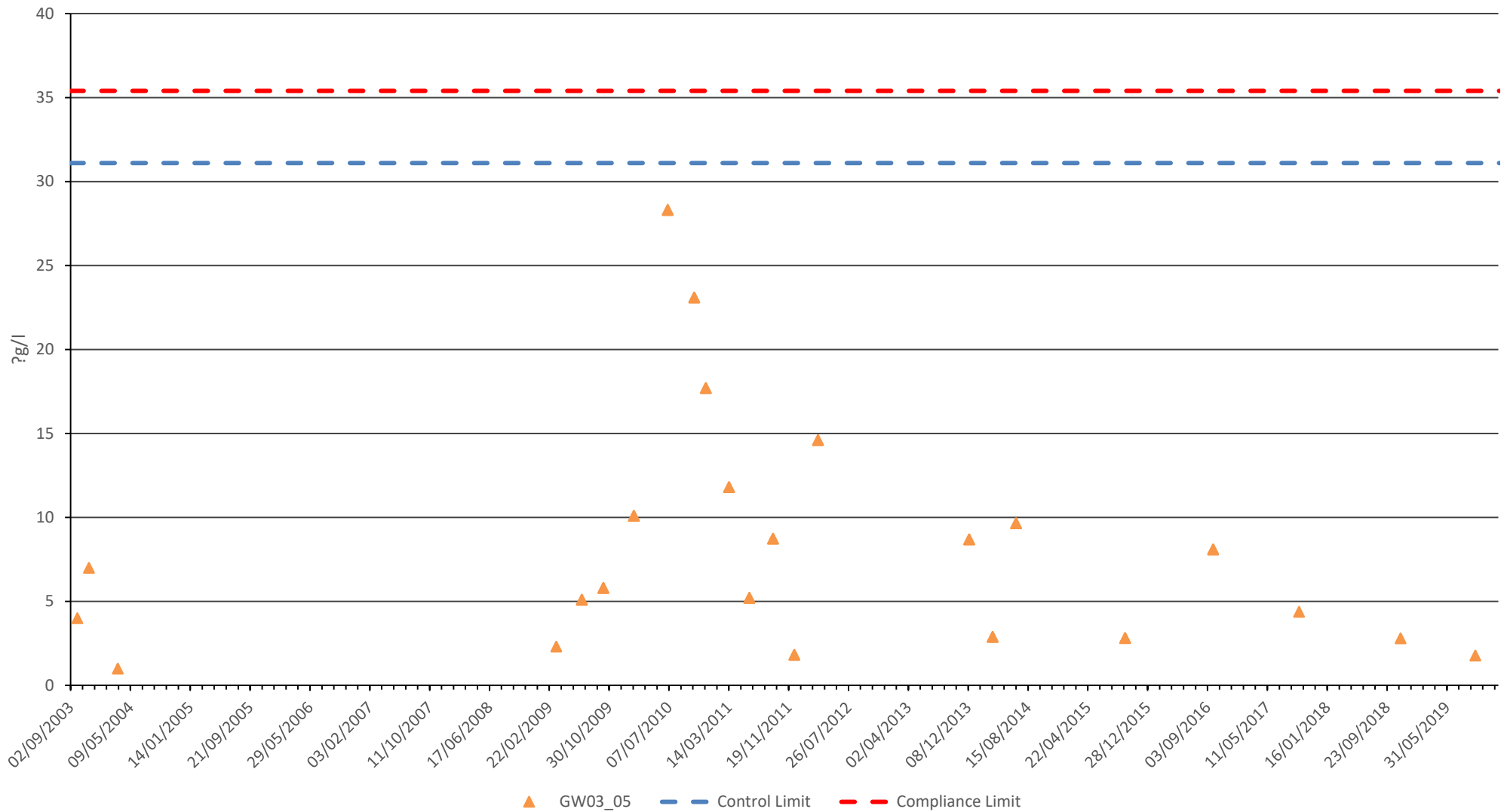
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Dockway Disposal Site

Arsenic in Groundwater

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A4 Scale	nts
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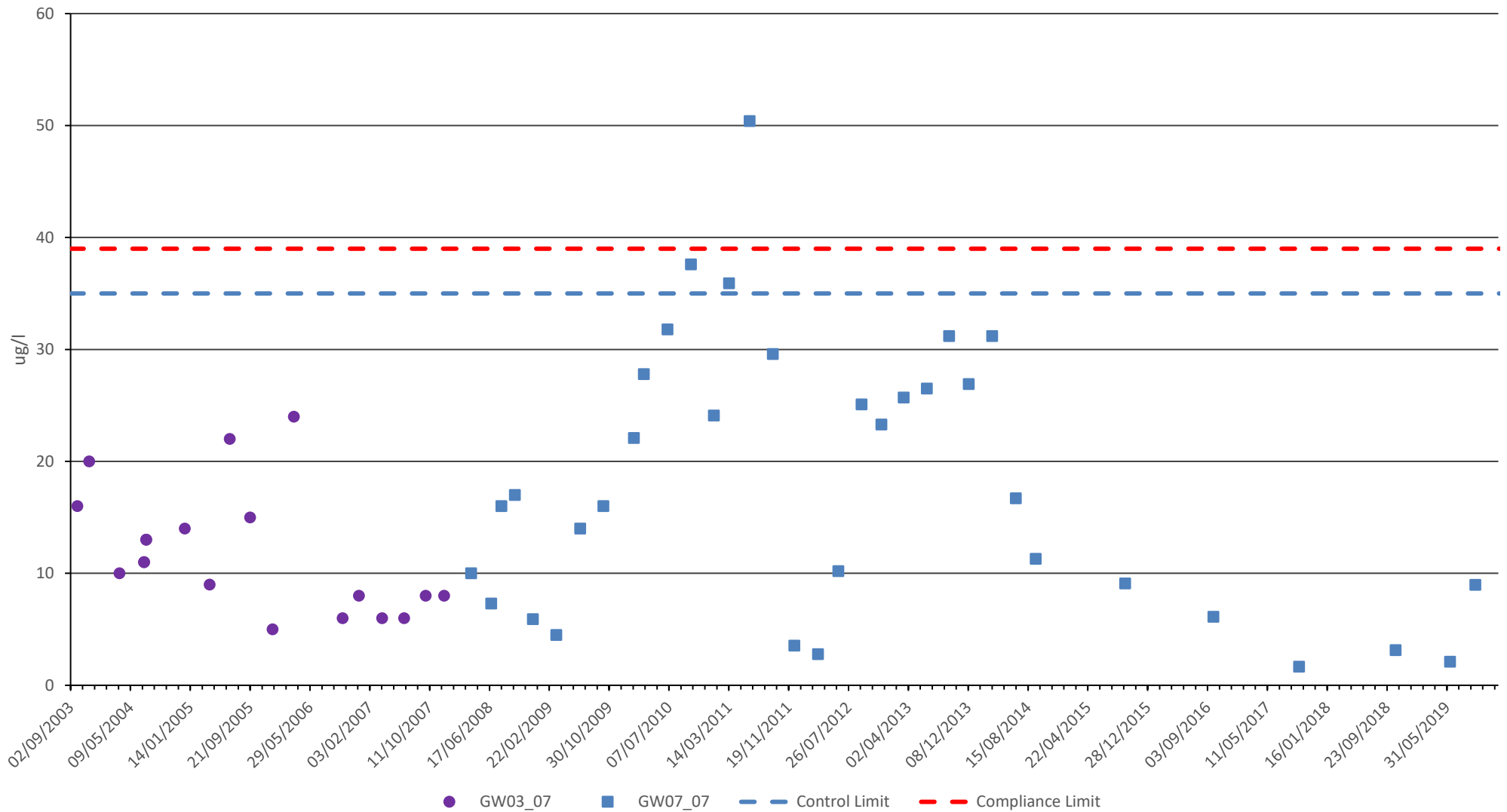



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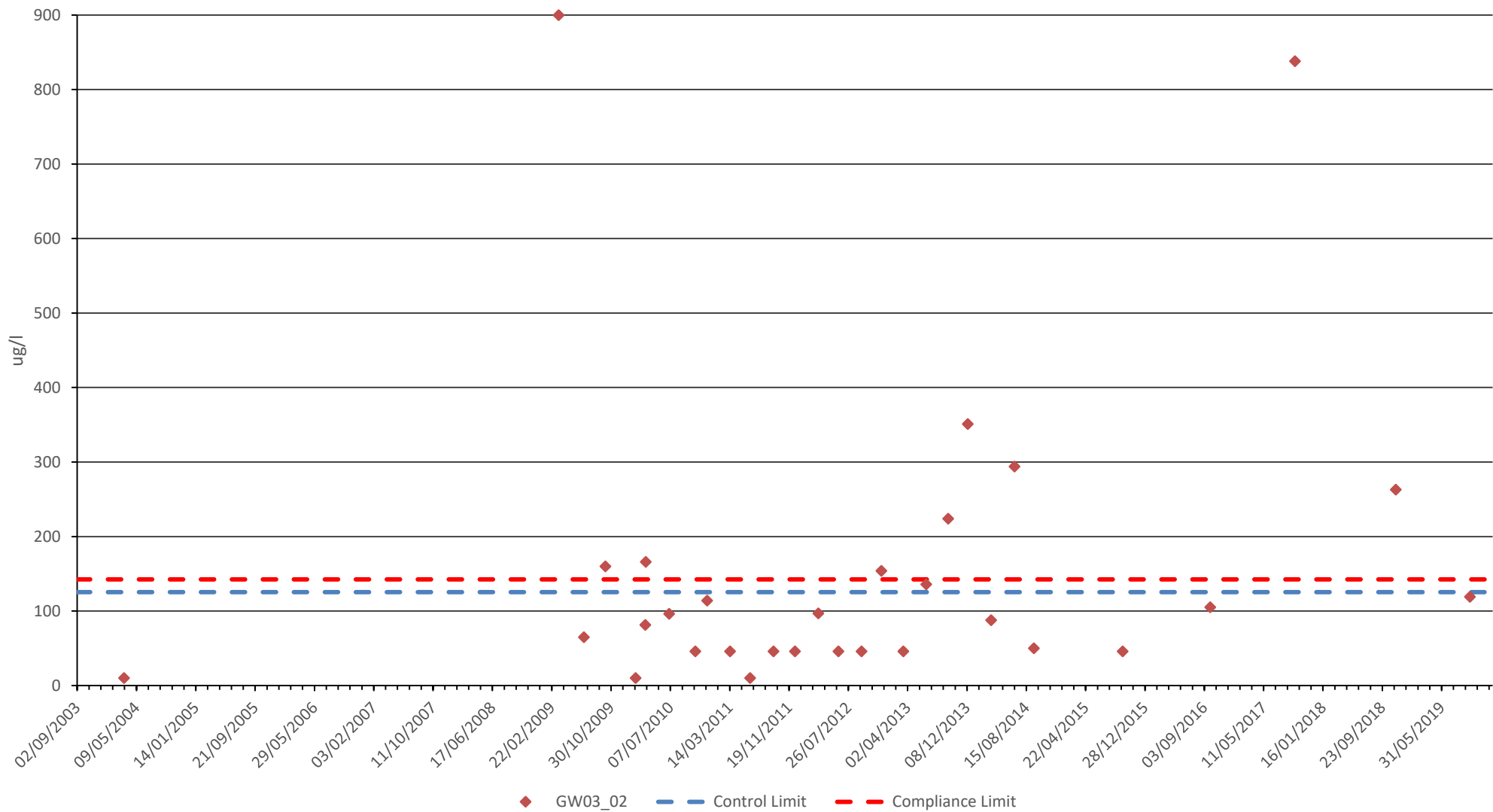
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Arsenic in Groundwater

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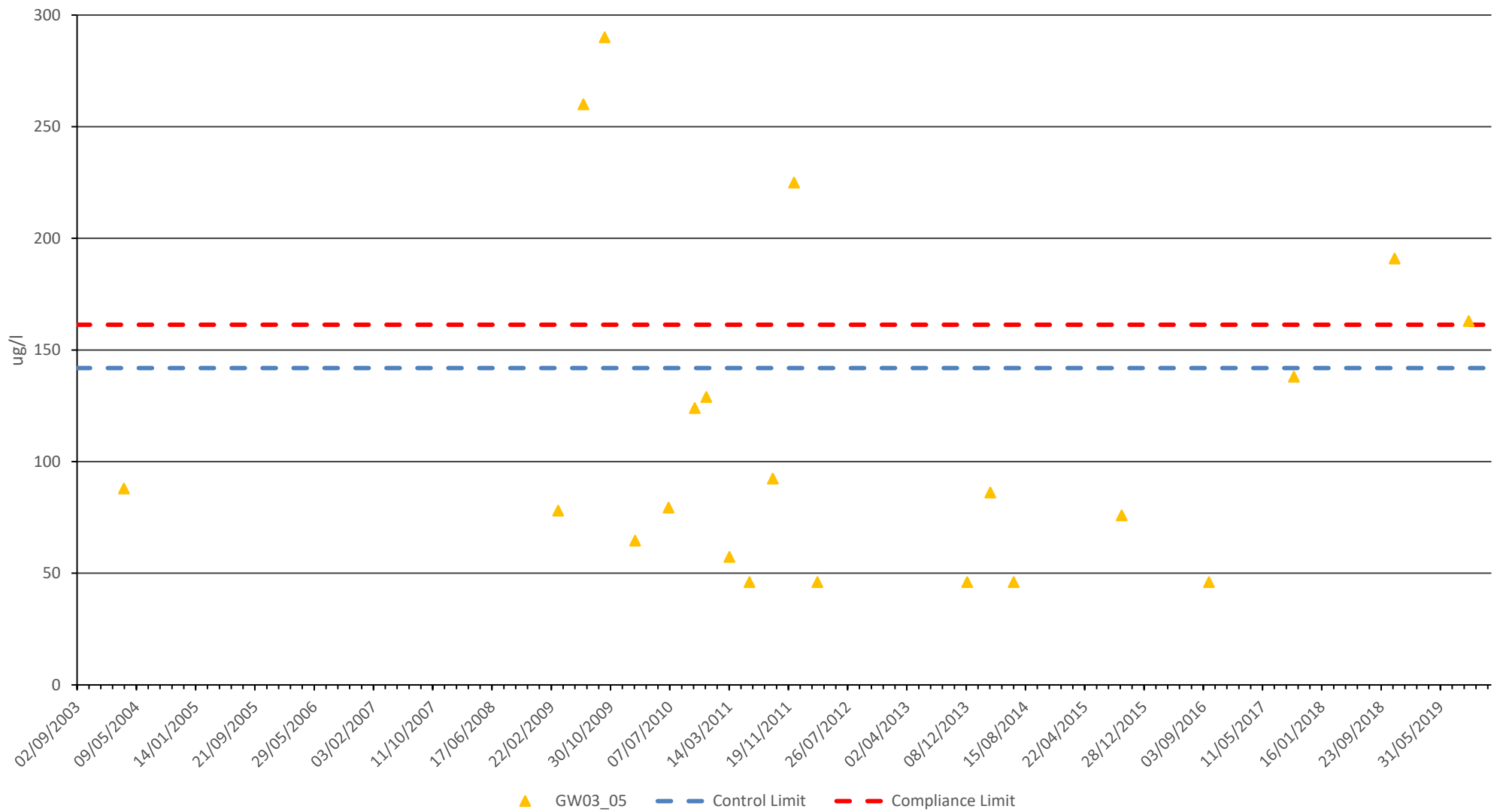
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Docksway Disposal Site

EPH in Groundwater

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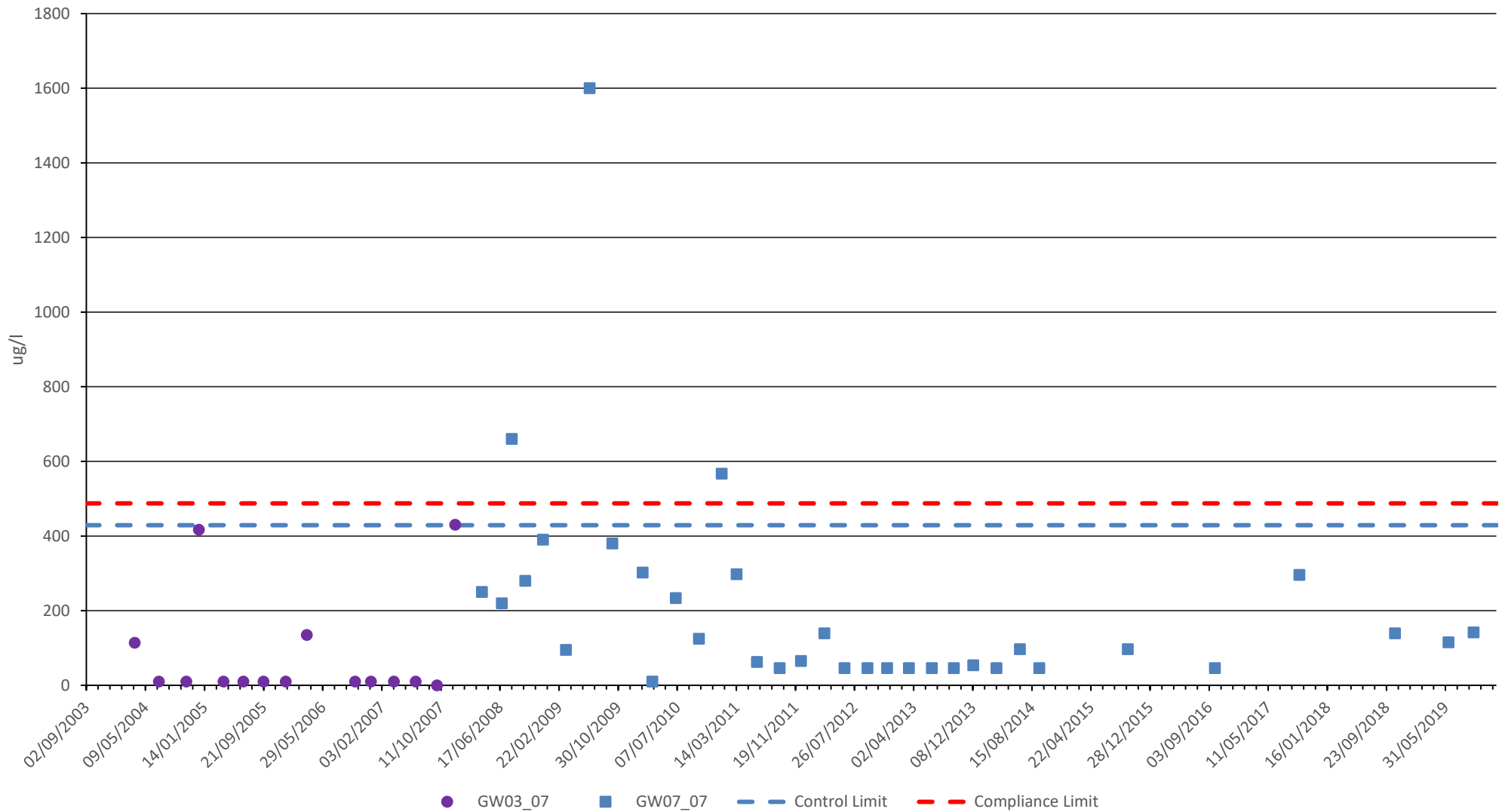
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EPH in Groundwater

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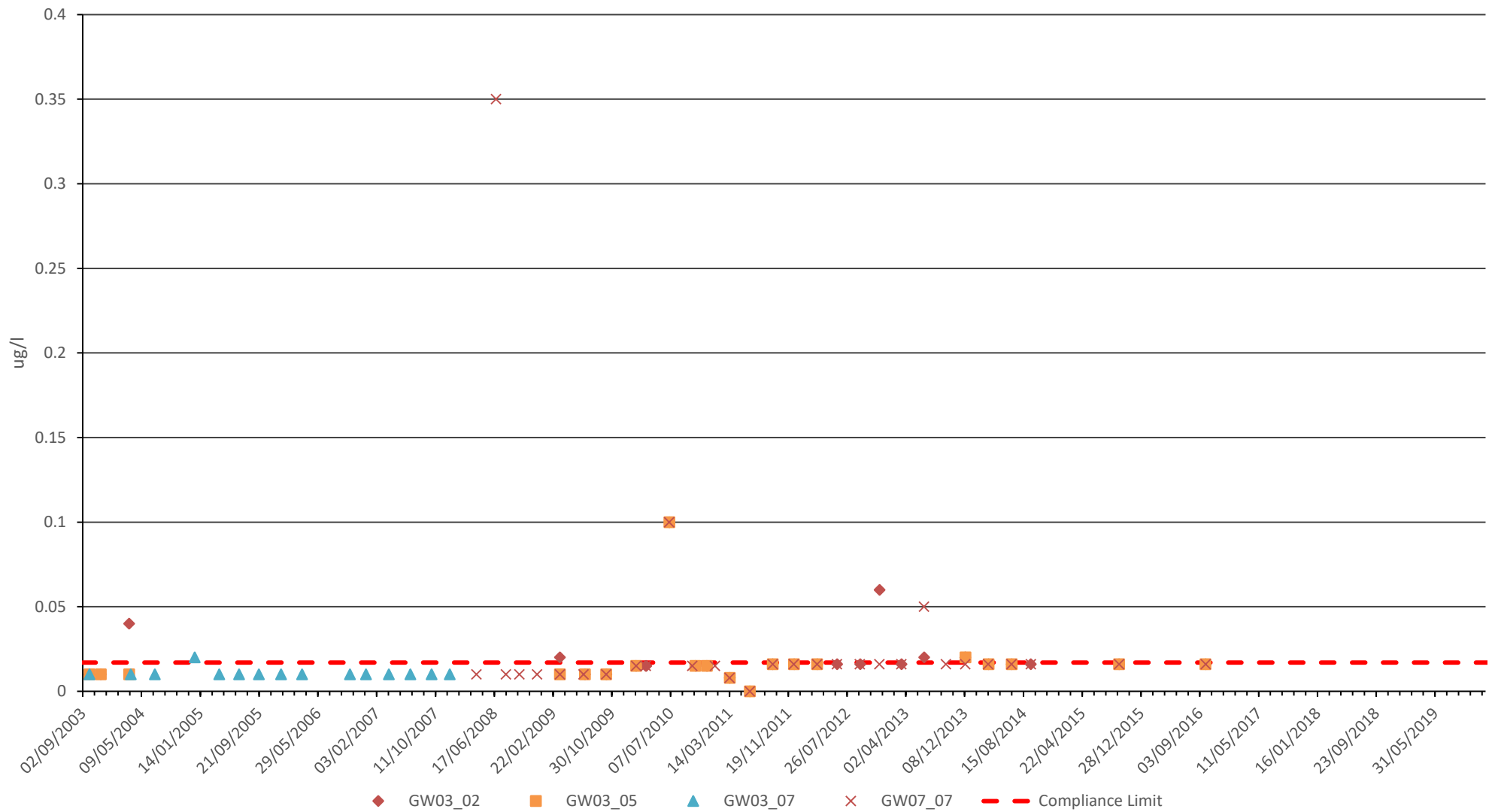
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EPH in Groundwater

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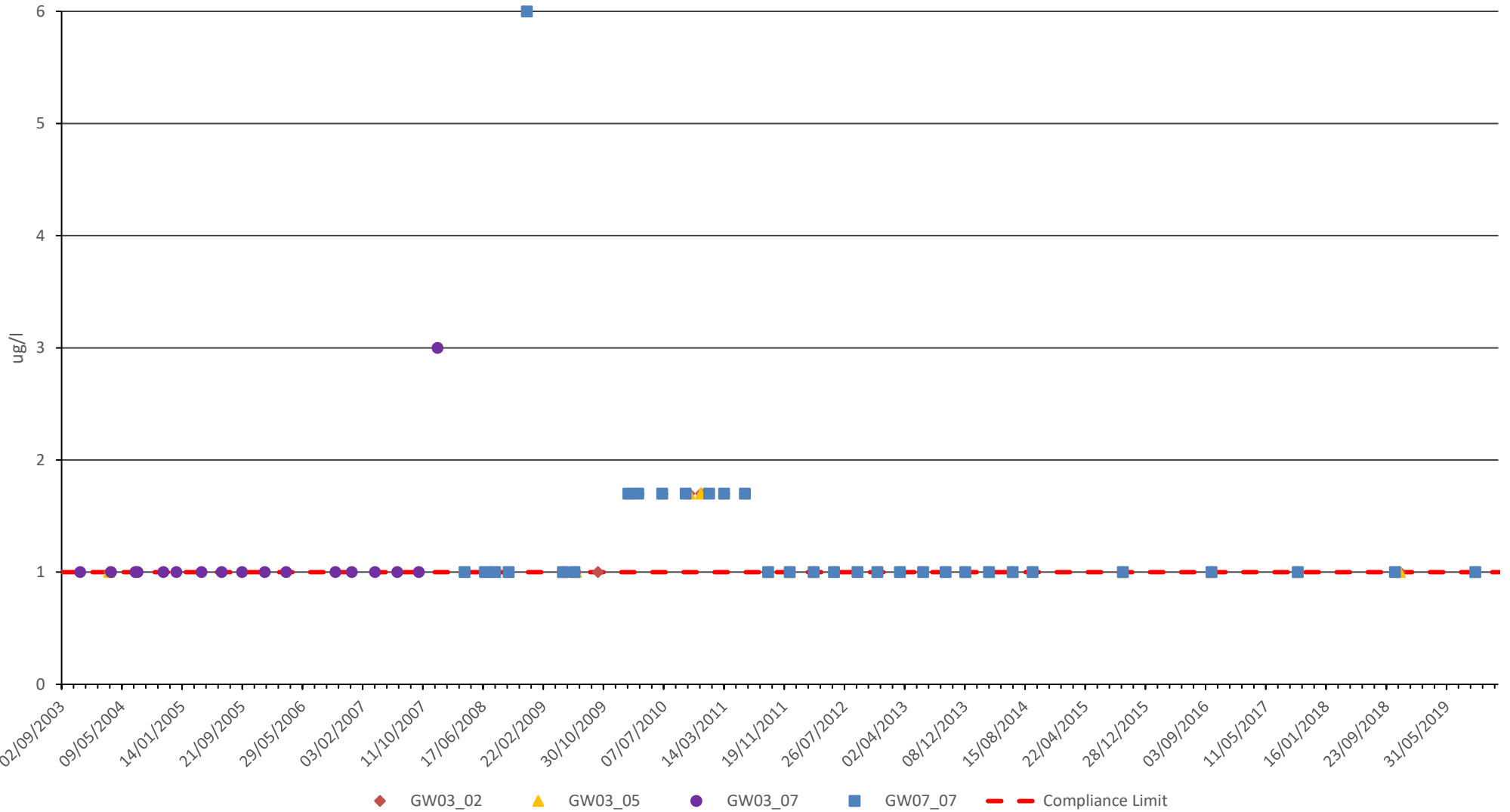
Client
Newport City Council

Docksway Disposal Site

Total Phenols in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR

Appendix
2-10



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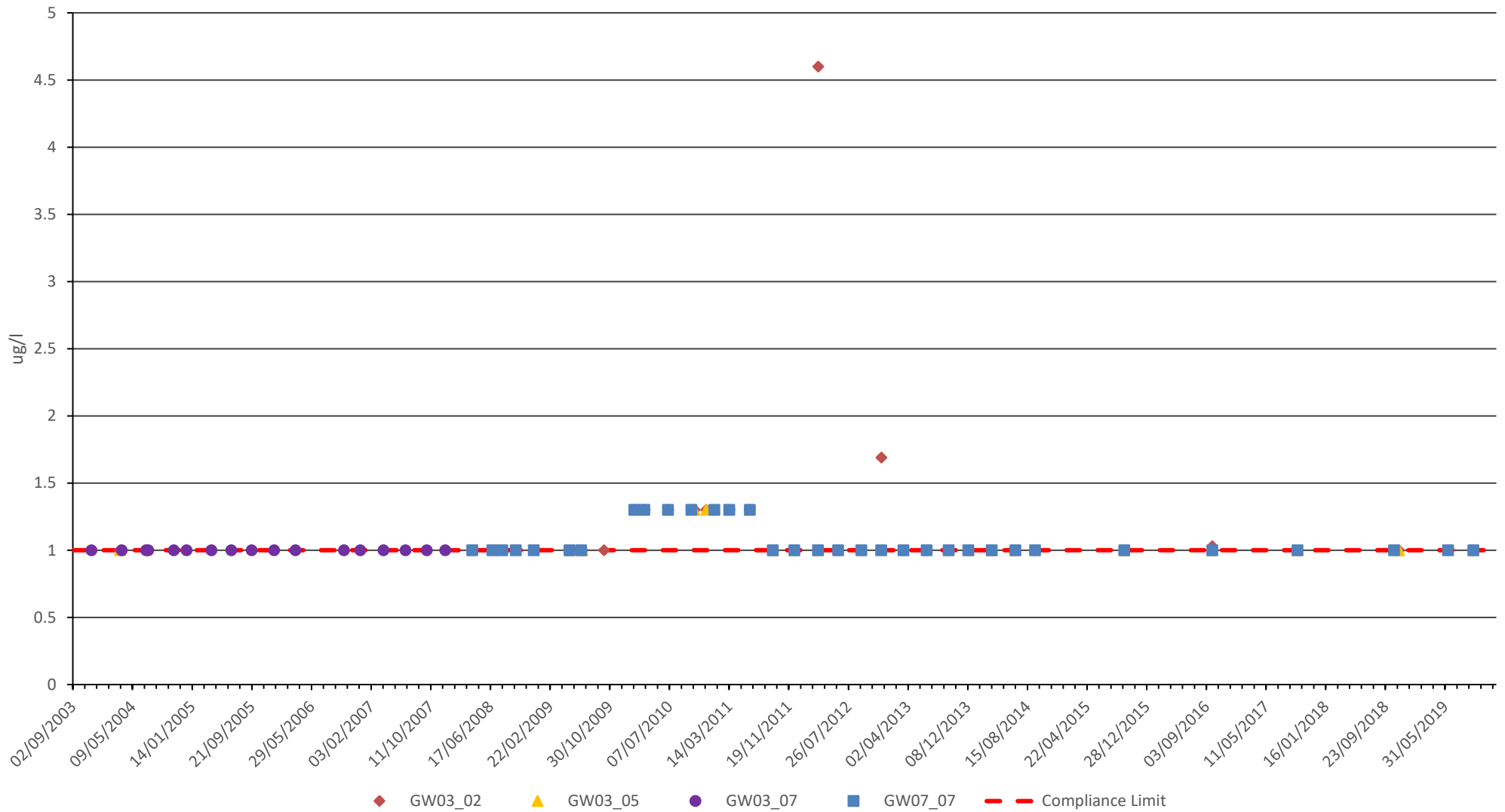
Docksway Disposal Site

Xylene in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR

Appendix

2-11



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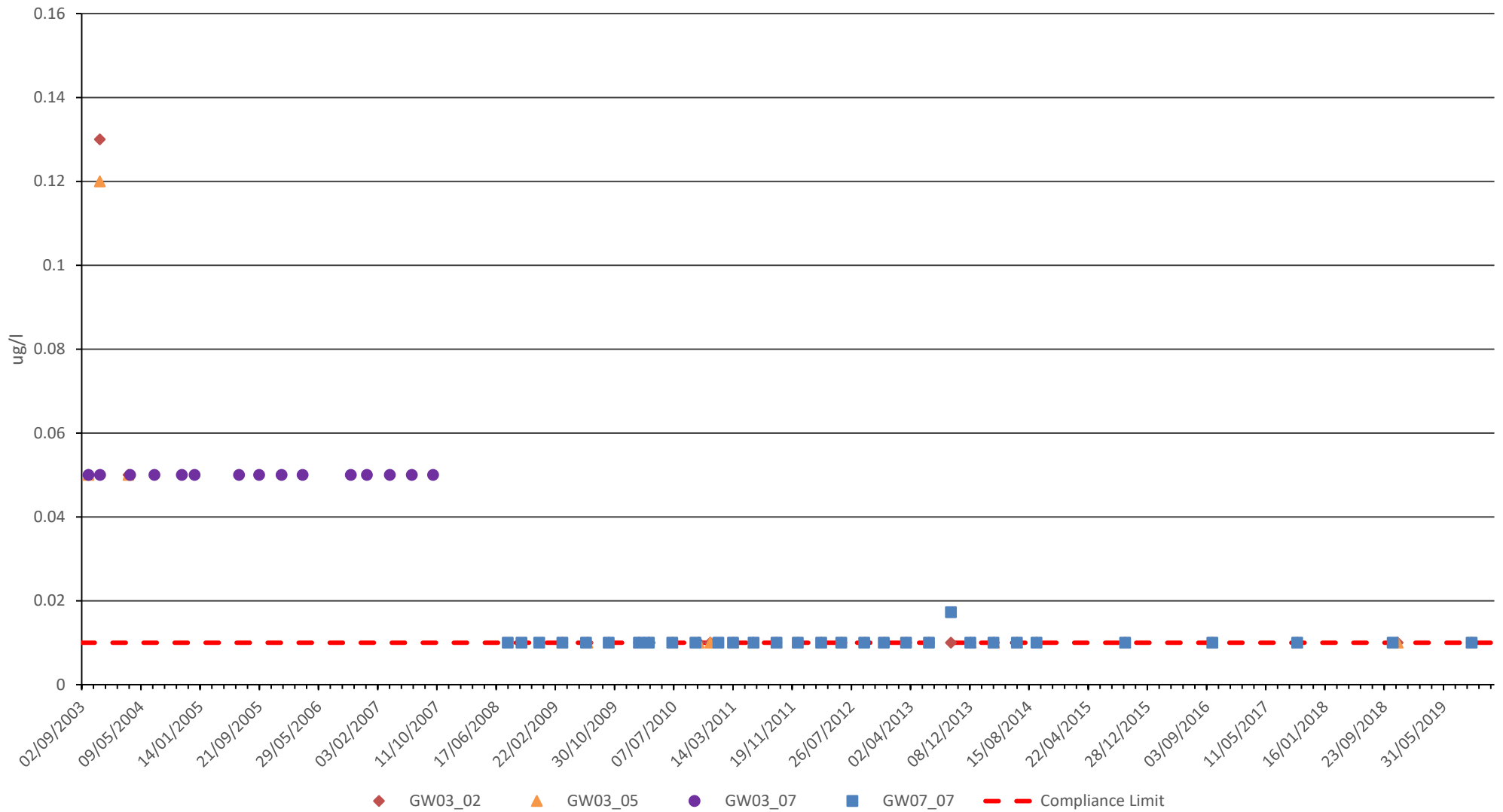
Docksway Disposal Site

Benzene in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR

Appendix

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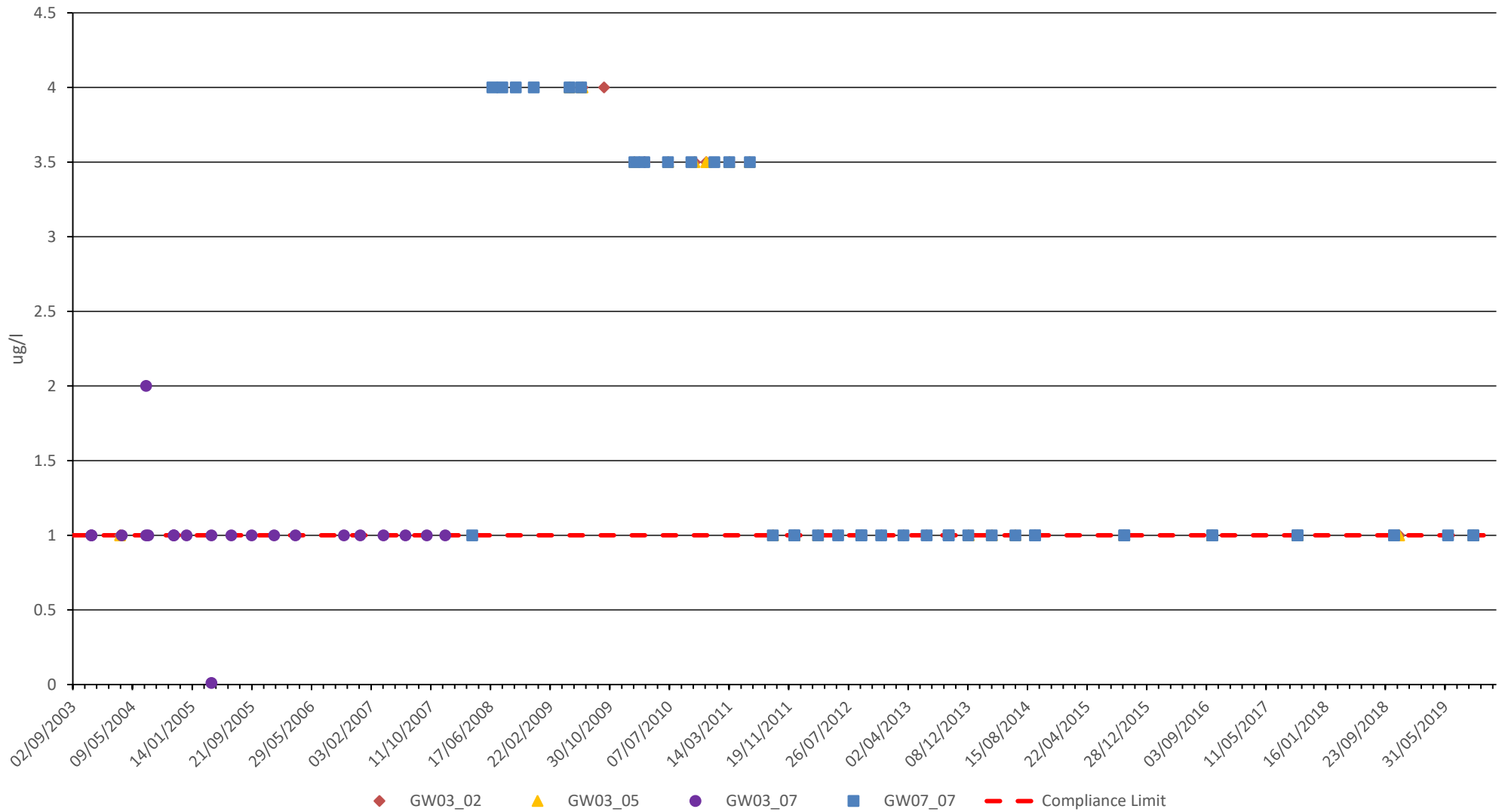
Newport City Council

Docksway Disposal Site

Mercury in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR

Appendix
2-13



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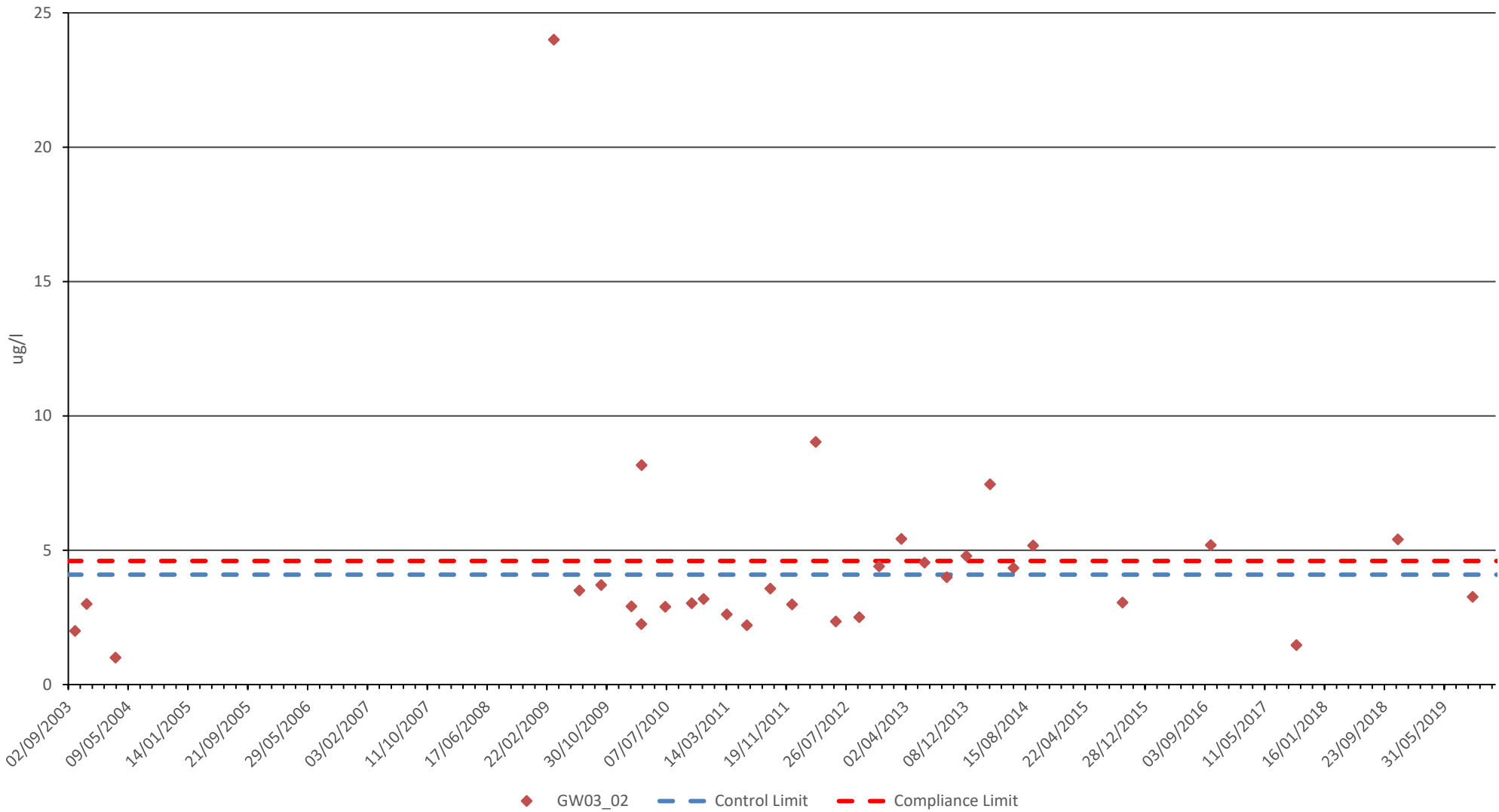
Docksway Disposal Site

Napthalene in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR

Appendix

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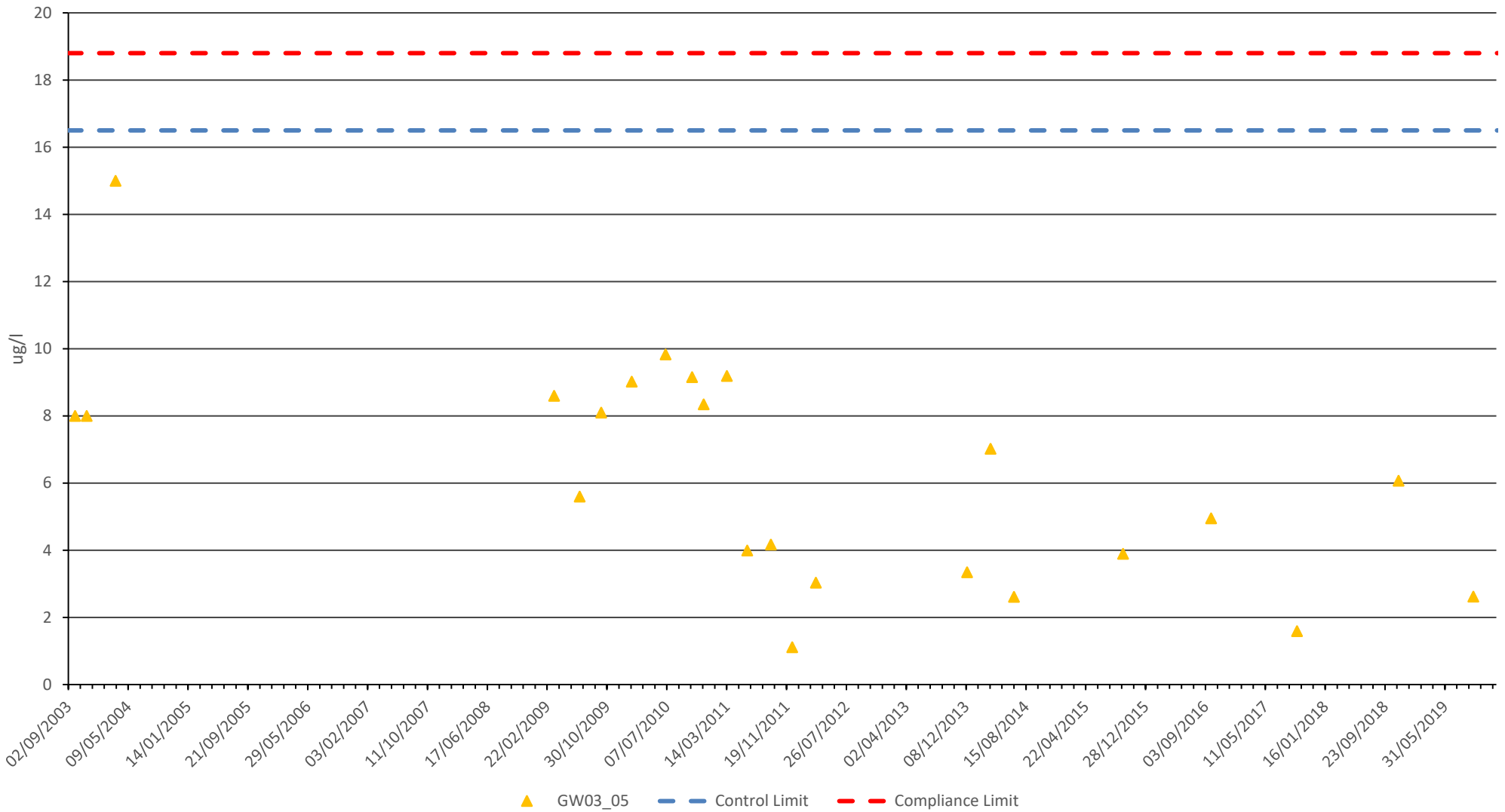



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Docksway Disposal Site
Nickel in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR
Appendix	2-15

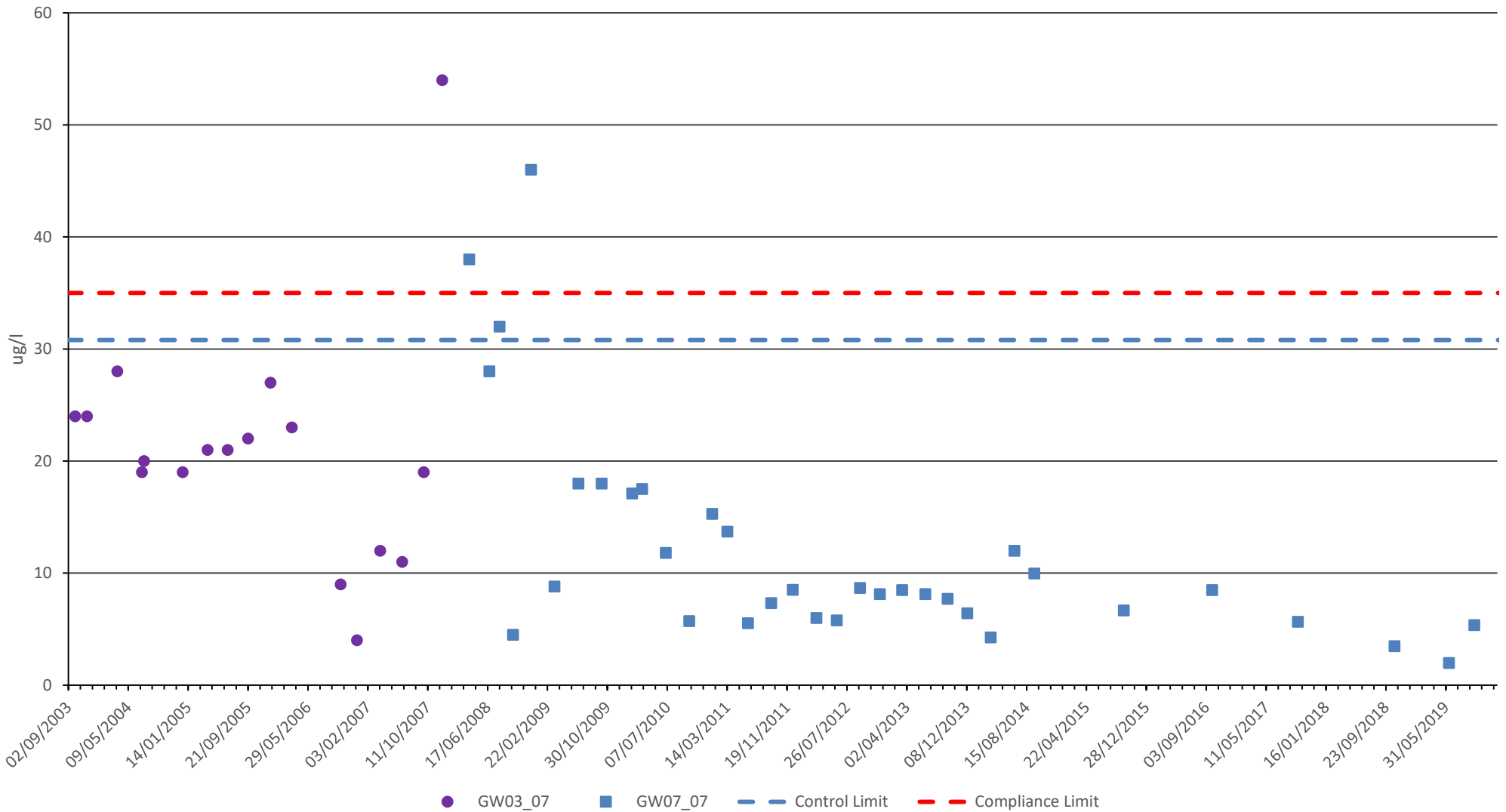



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Docksway Disposal Site
Nickel in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR
Appendix	2-16



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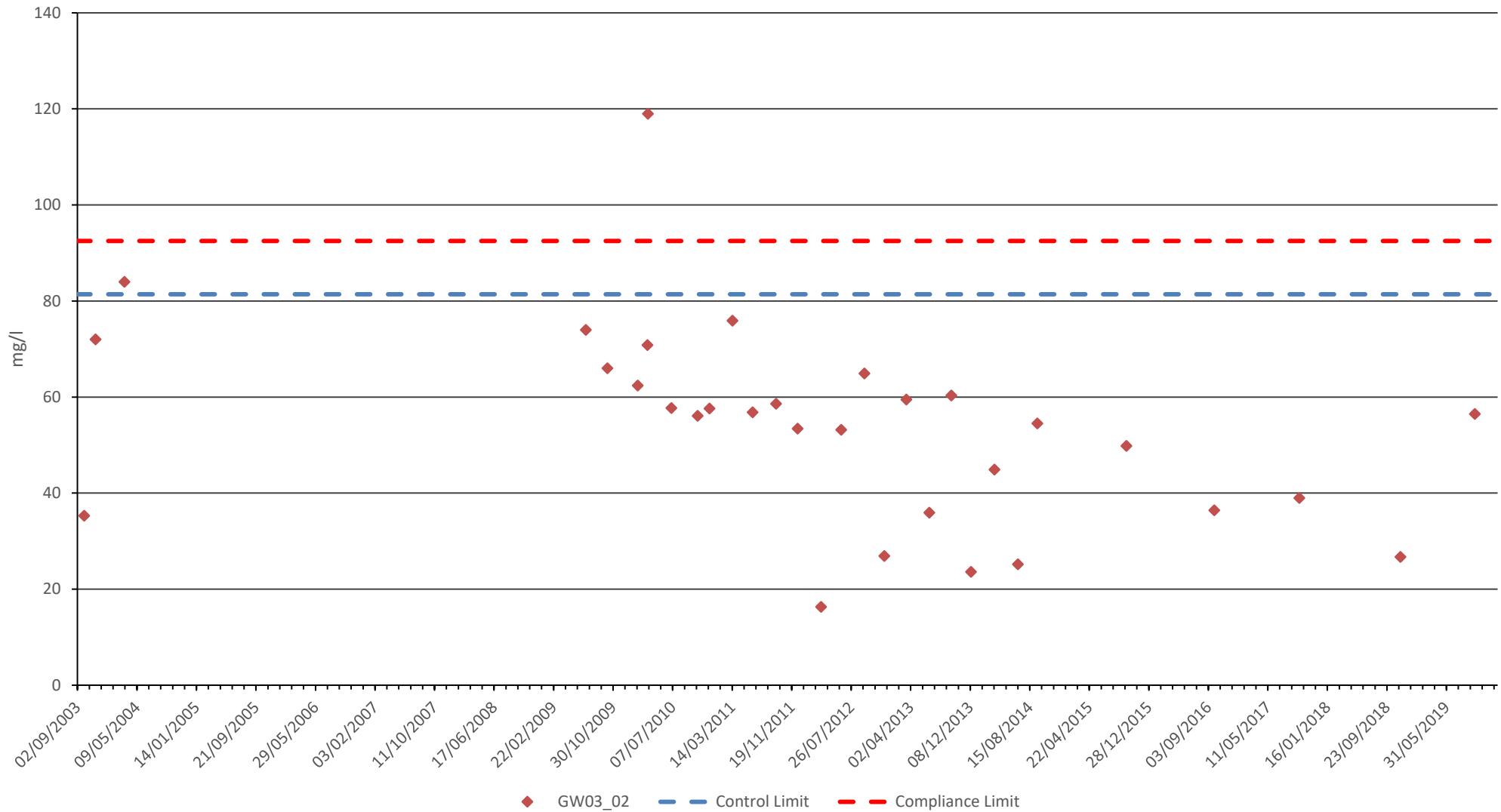
Newport City Council

Docksway Disposal Site

Nickel in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR

Appendix
2-17

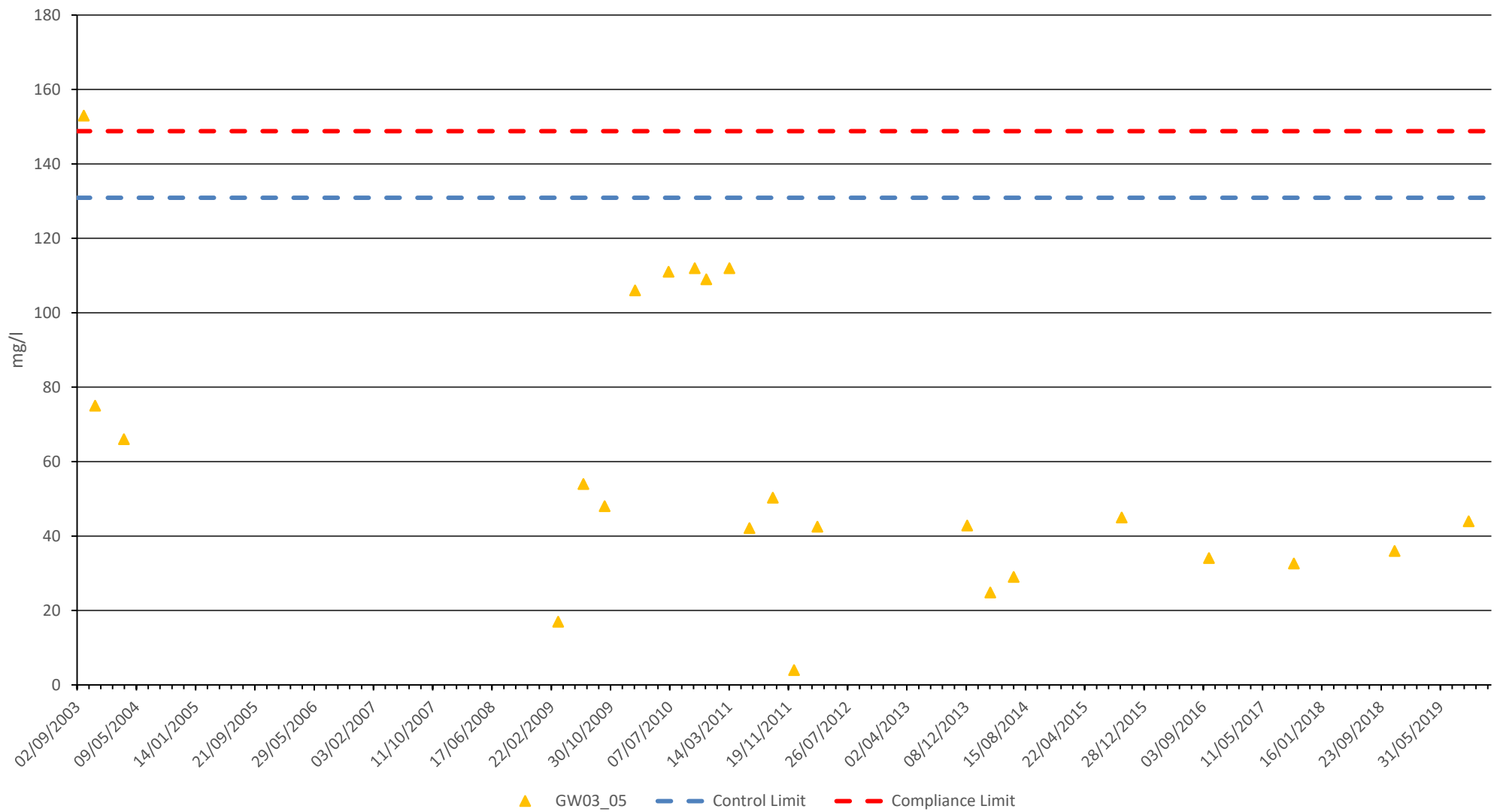



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Docksway Disposal Site
Potassium in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR
Appendix	2-18

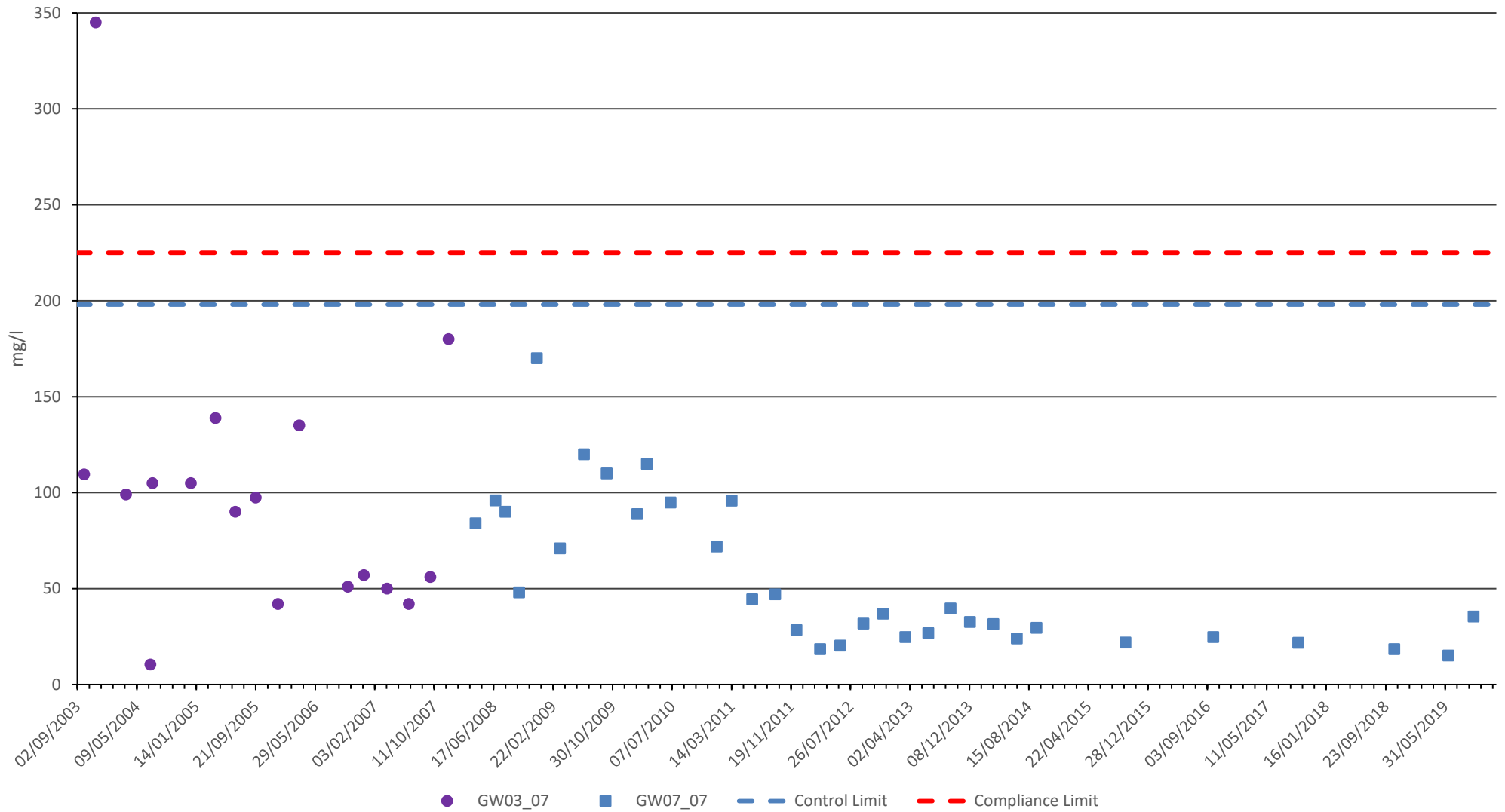



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Docksway Disposal Site
Potassium in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR
Appendix	2-19

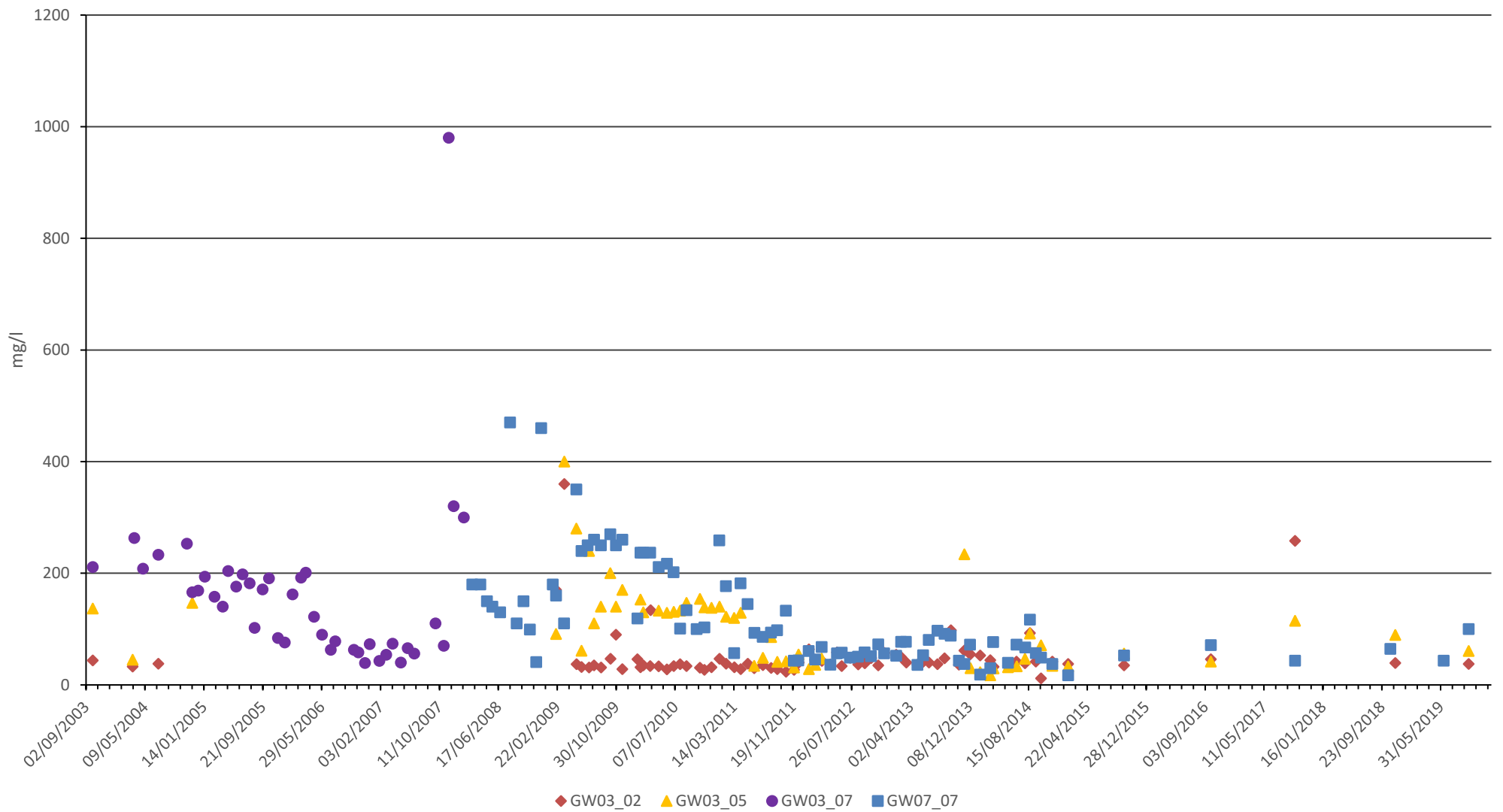



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Docksway Disposal Site
Potassium in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR
Appendix	2-20



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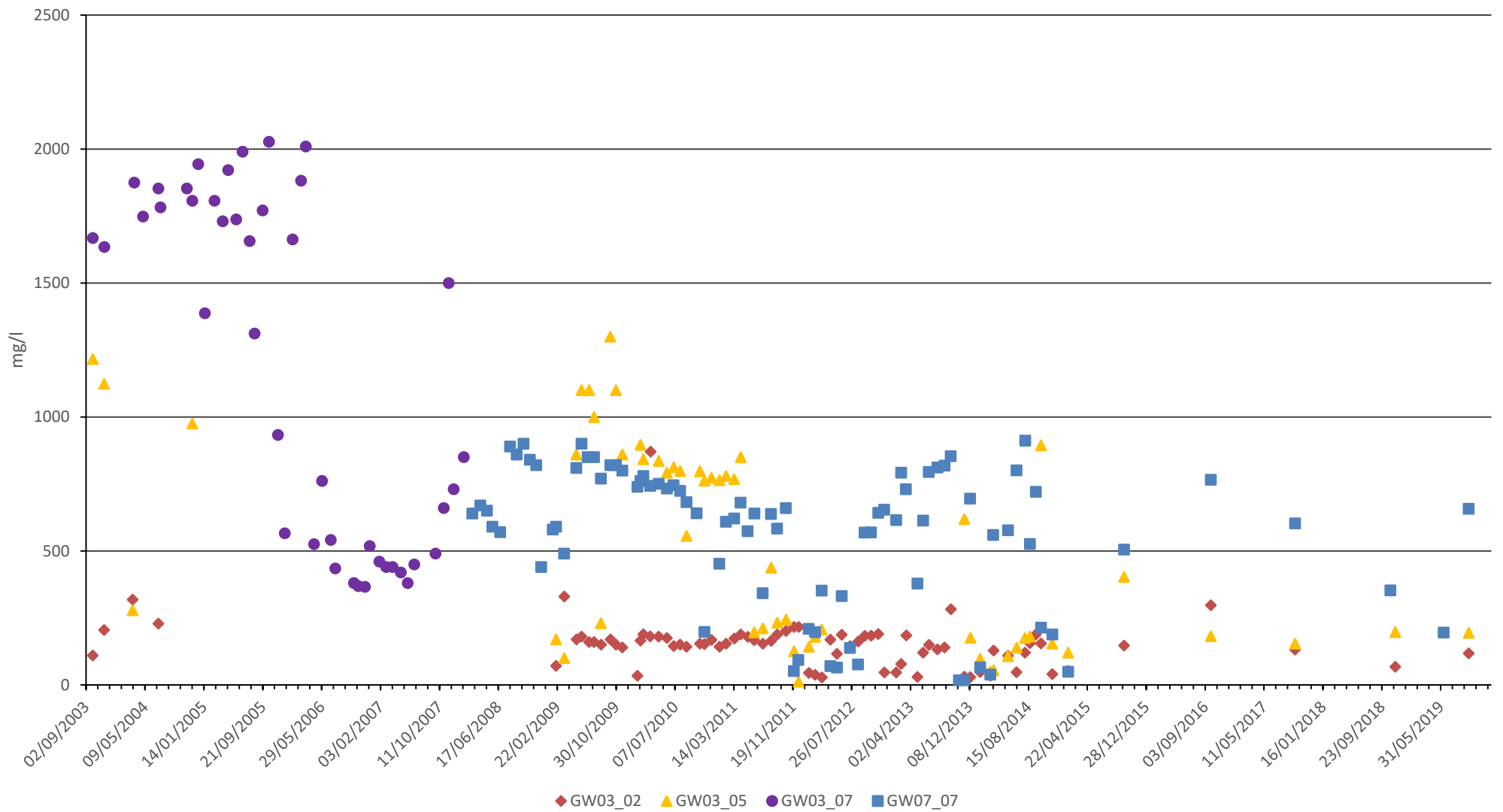
Newport City Council

Docksway Disposal Site

Chemical Oxygen Demand in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR

Appendix
2-21



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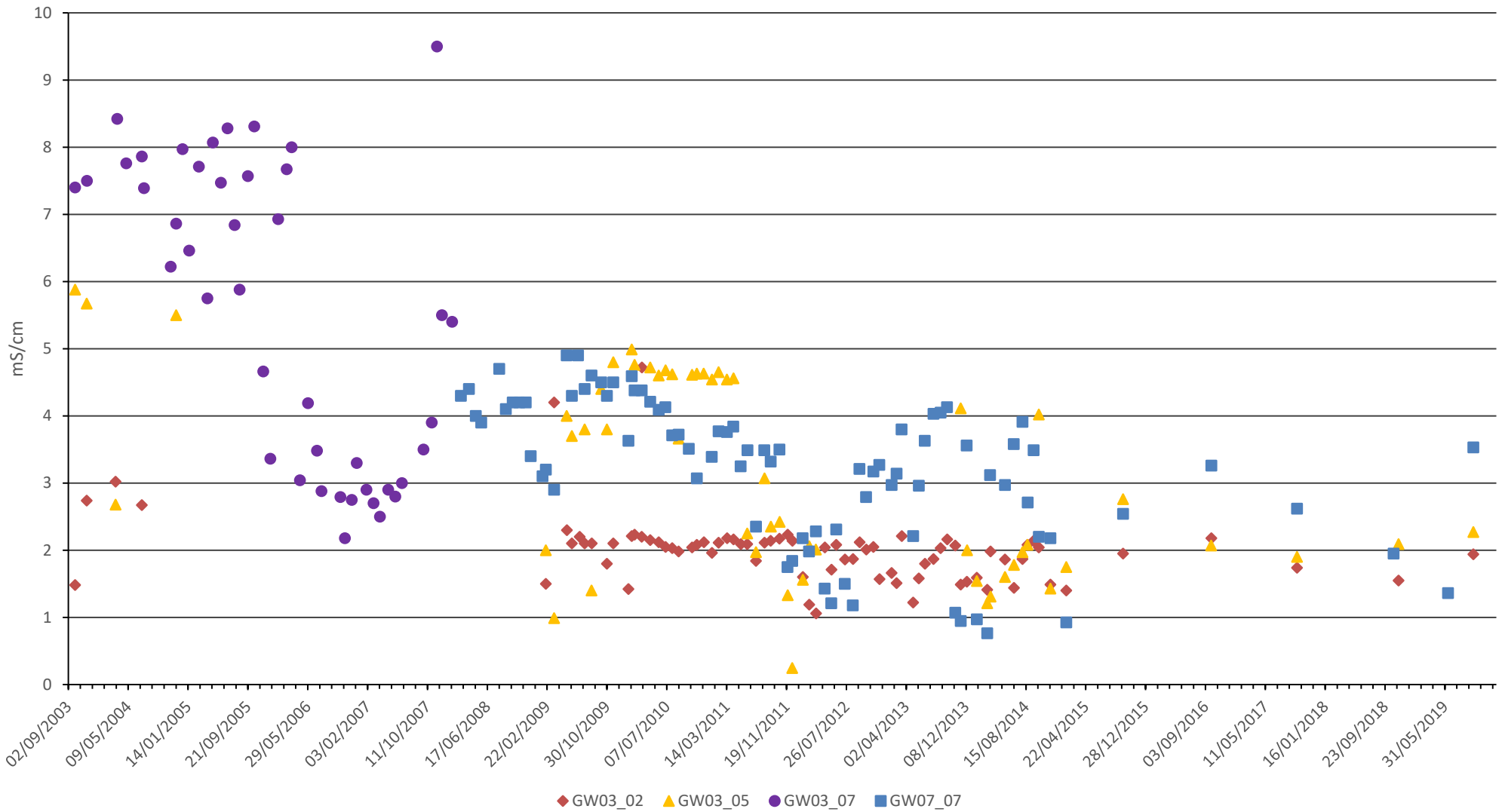
Docksway Disposal Site

Chloride in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR

Appendix

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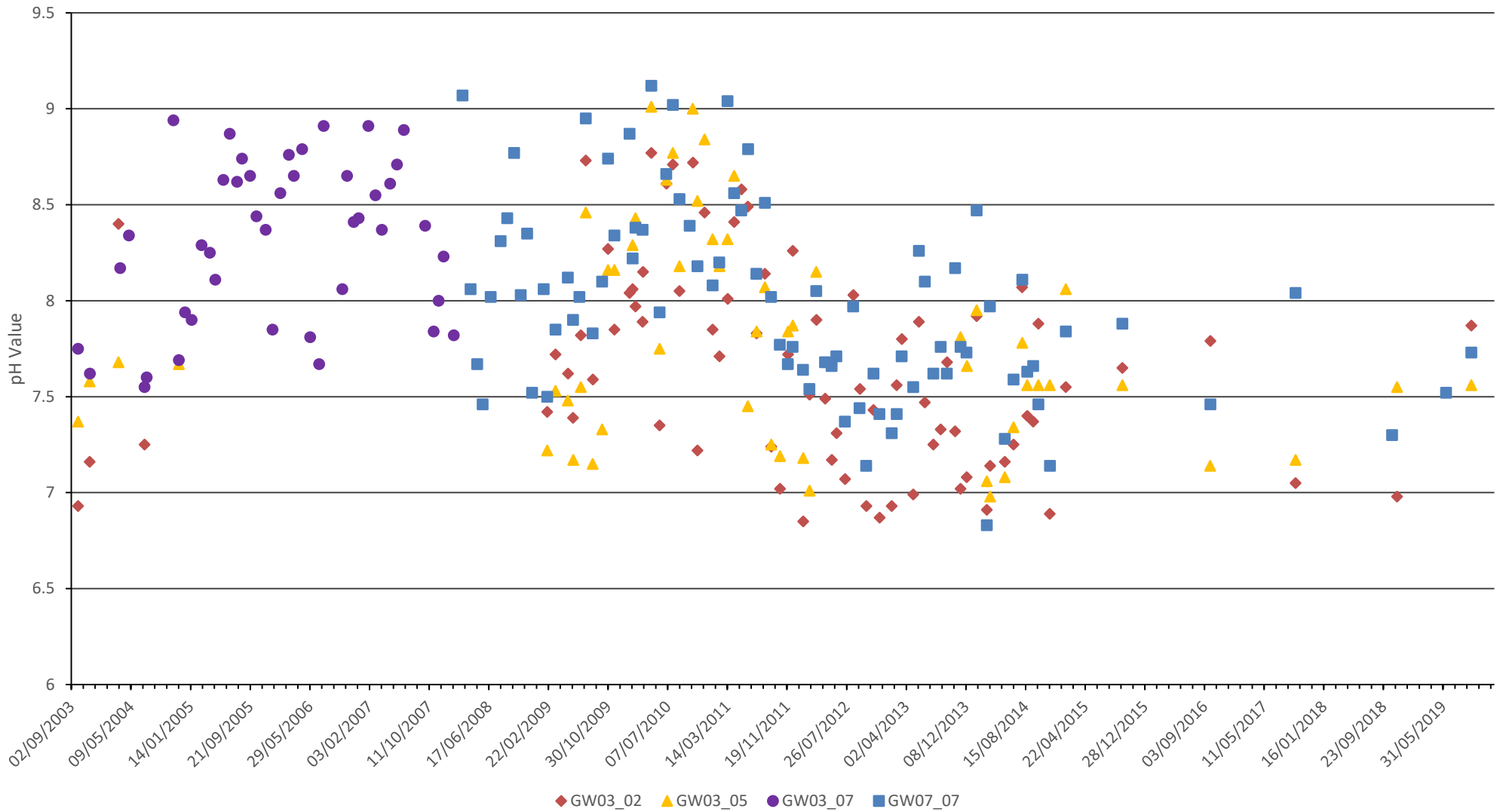
Docksway Disposal Site

Electrical Conductivity in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR

Appendix

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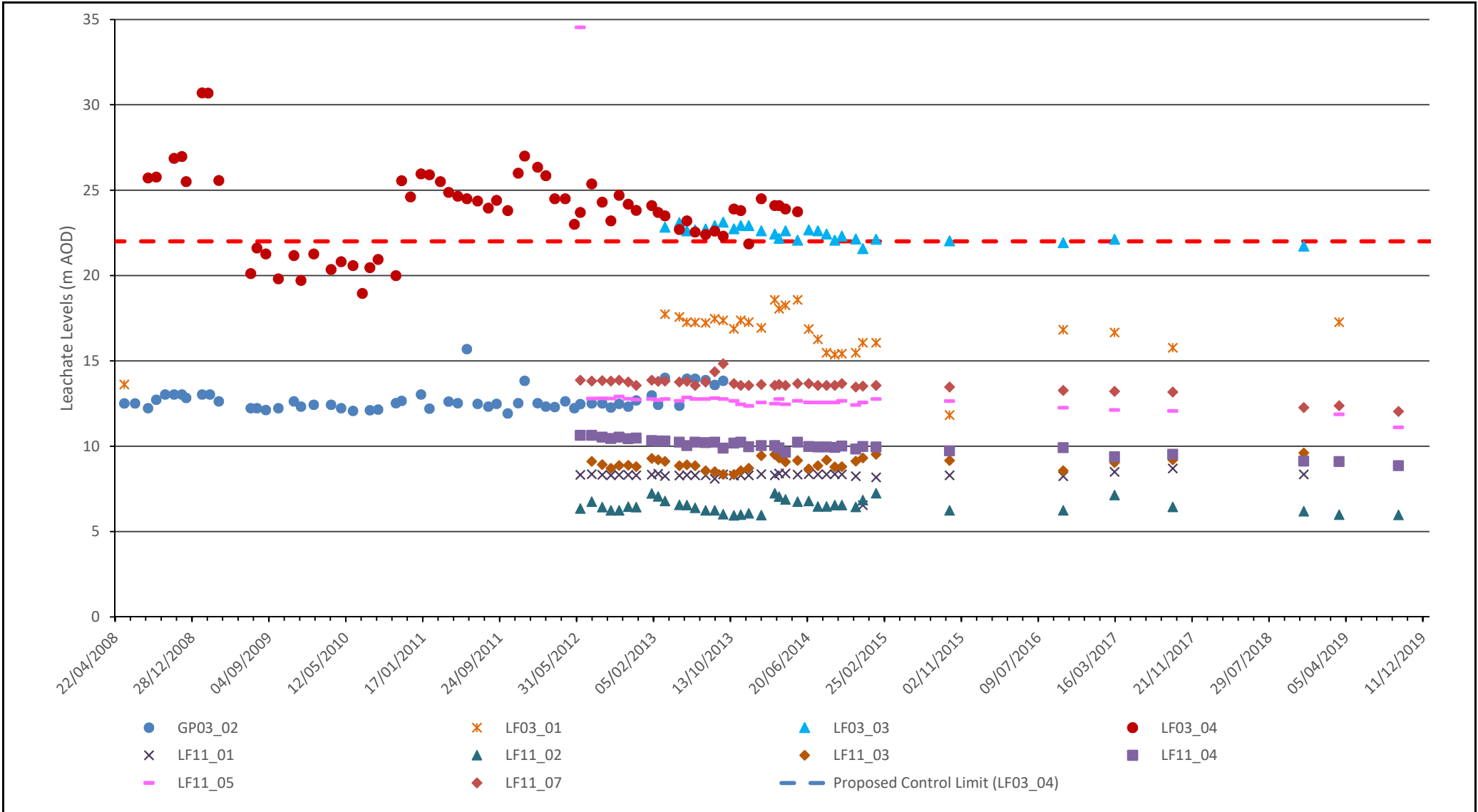

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Docksway Disposal Site
pH in Groundwater

Date	January 2020
A4 Scale	nts
Drawn	NC
Checked	VKR
Appendix	2-24

Appendix 3 Leachate Graphs

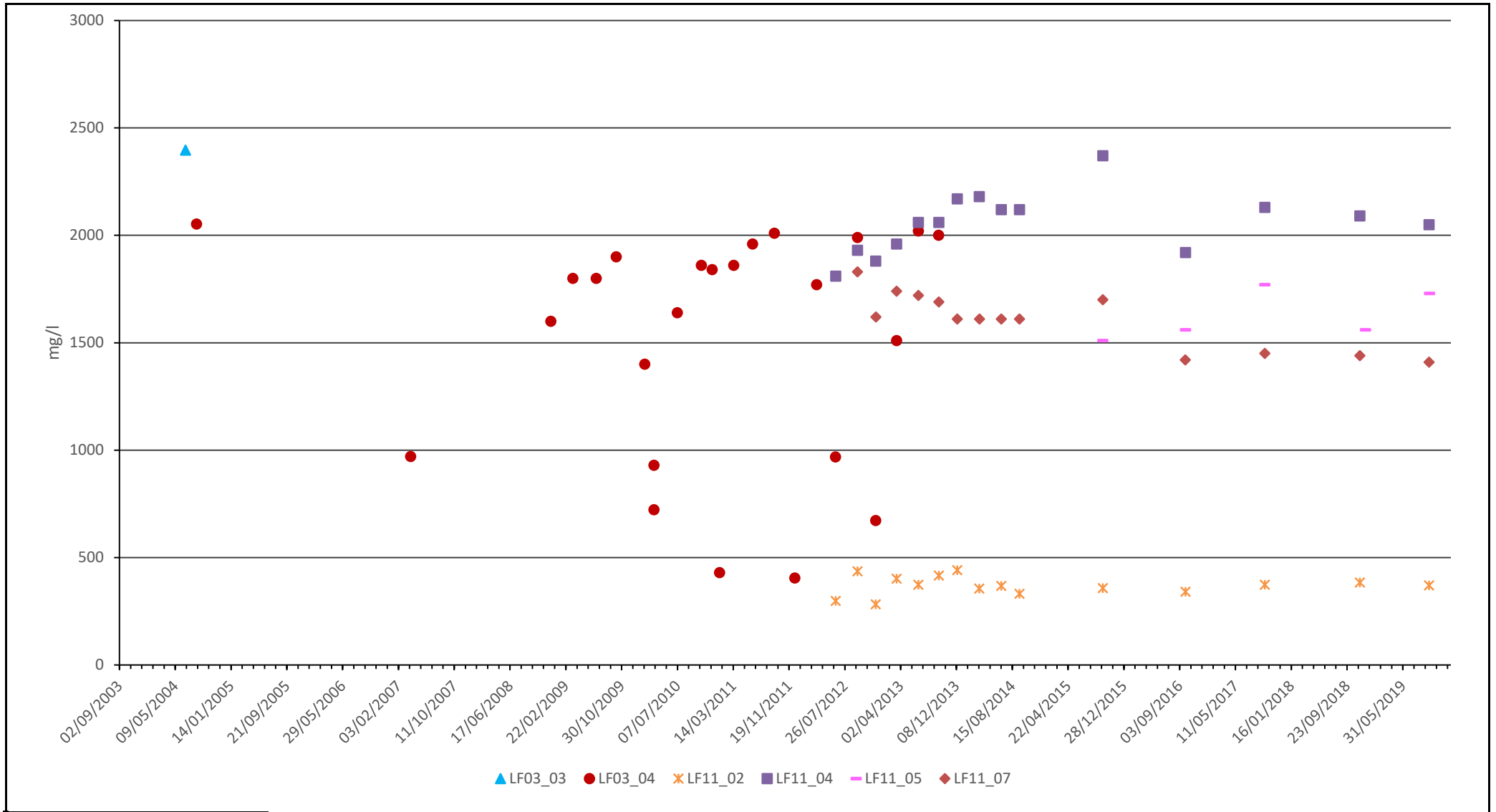



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Docksway Disposal Site
Leachate Levels at Area 1

Date	February 2020
A4 Scale	nts
Drawn	RN
Checked	VKR
Appendix	
3-1	



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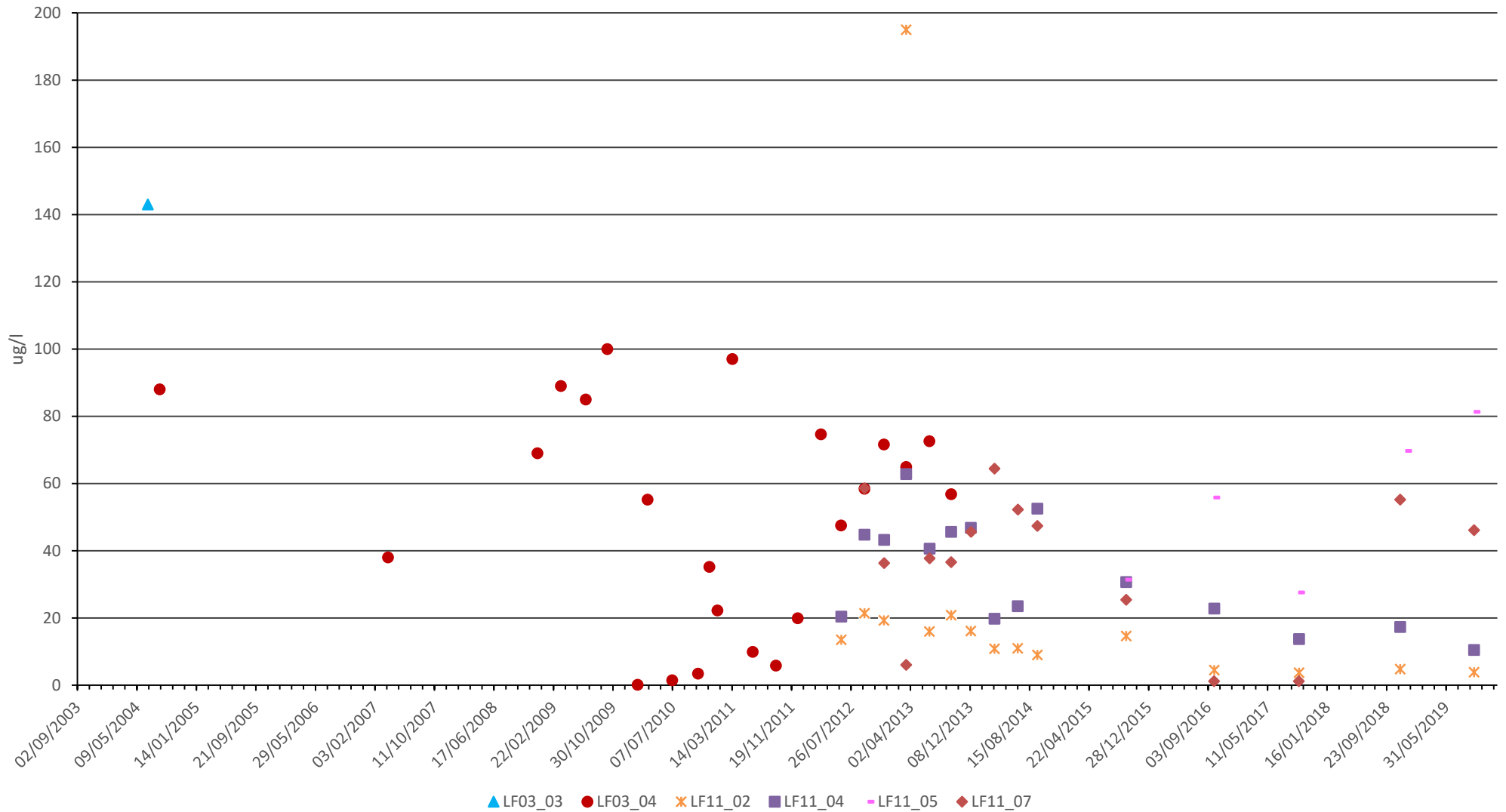
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Docksway Disposal Site

Ammoniacal Nitrogen in Leachate

Date	January 2020
A4 Scale	nts
Drawn	RN
Checked	VKR

Appendix
3-2



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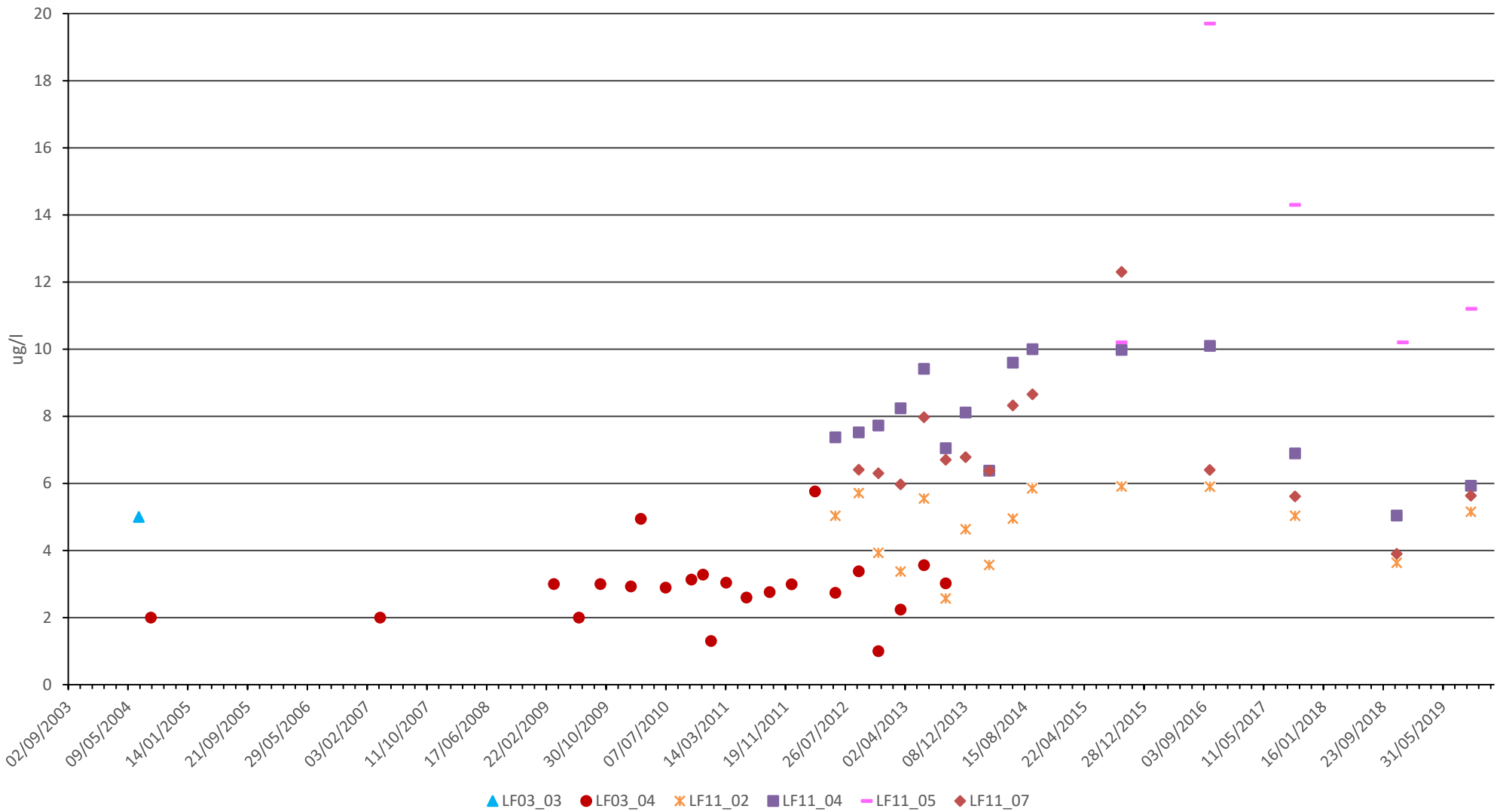
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Docksway Disposal Site

Arsenic in Leachate

Date	January 2020
A4 Scale	nts
Drawn	RN
Checked	VKR

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3-3



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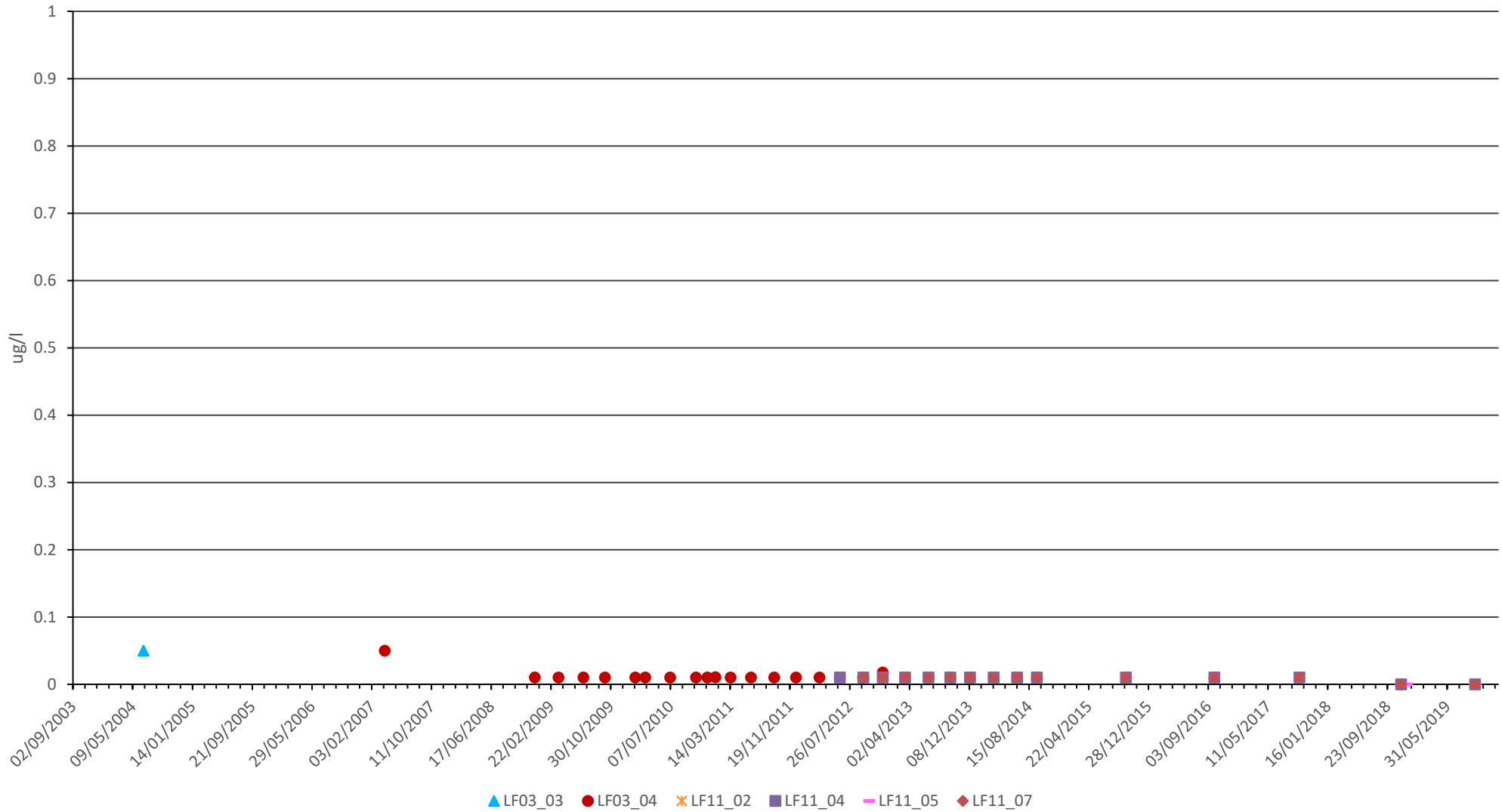
Docksway Disposal Site

Benzene in Leachate

Date	January 2020
A4 Scale	nts
Drawn	RN
Checked	VKR

Appendix

3-4



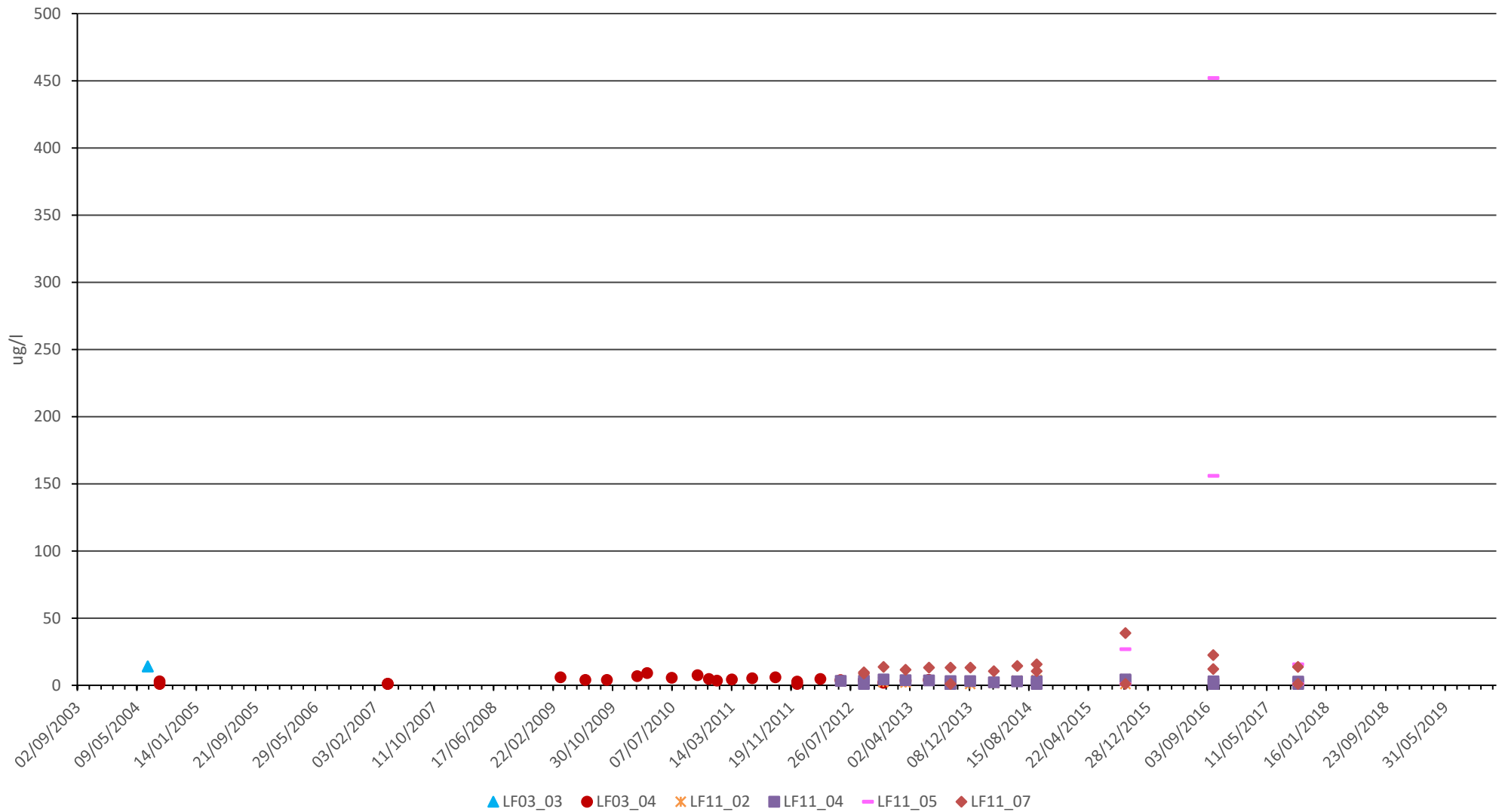

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Docksway Disposal Site
Mercury in Leachate

Date	January 2020
A4 Scale	nts
Drawn	RN
Checked	VKR

Appendix
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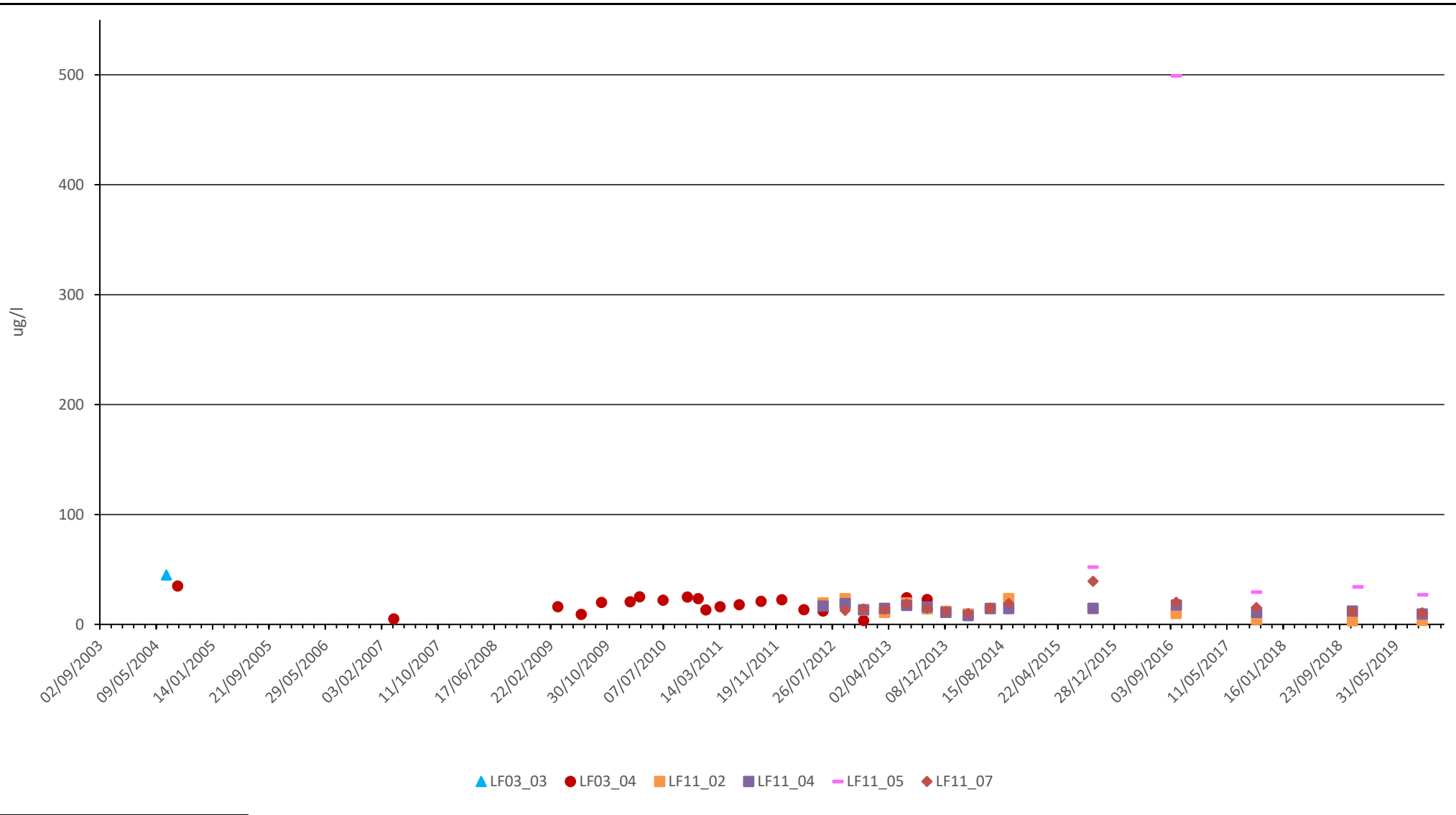

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Docksway Disposal Site
Naphthalene in Leachate

Date	January 2020
A4 Scale	nts
Drawn	RN
Checked	VKR

Appendix
3-6

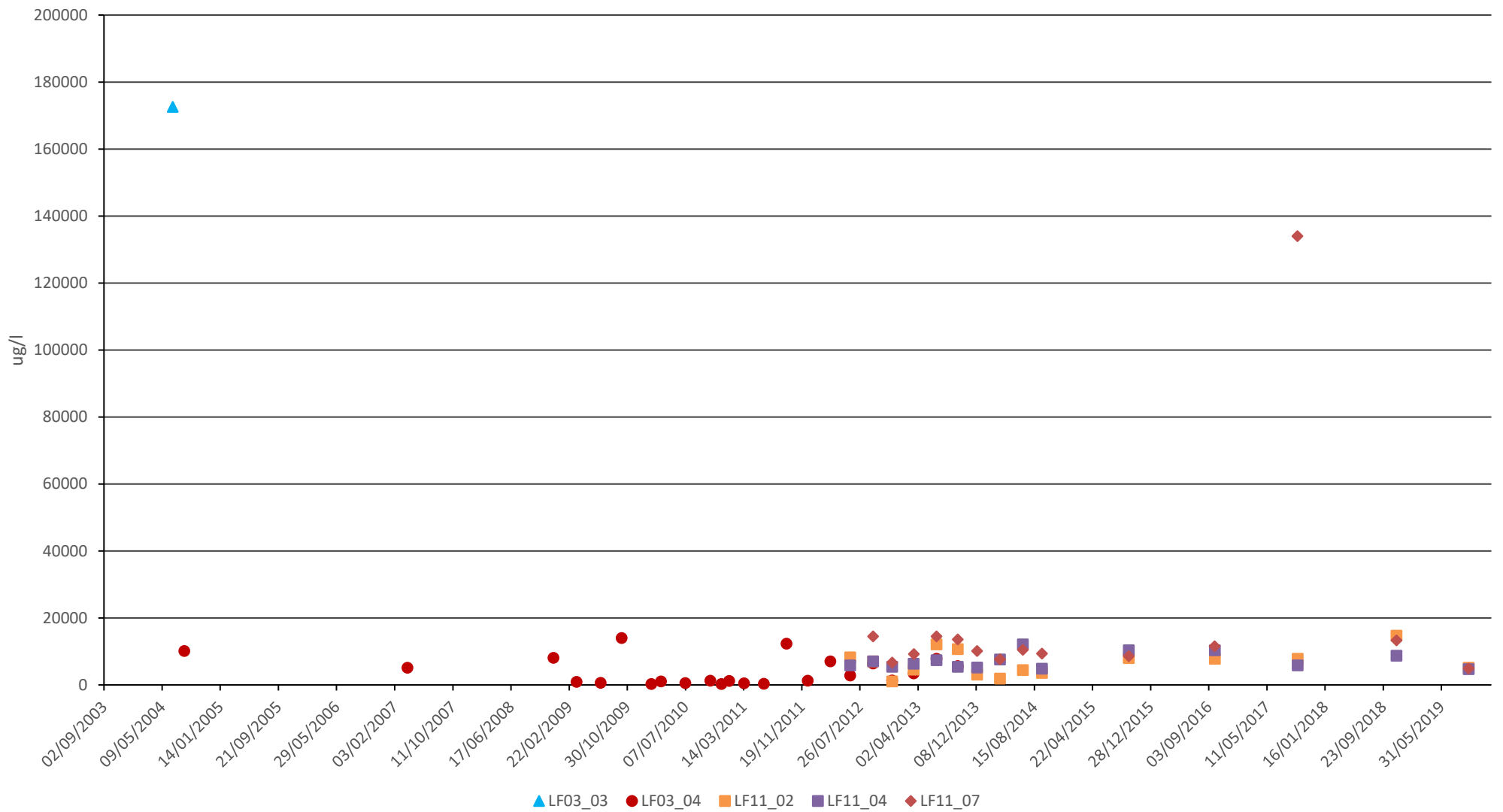



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Docksway Disposal Site
o-Xylene in Leachate

Date	January 2020
A4 Scale	nts
Drawn	RN
Checked	VKR
Appendix	3-7



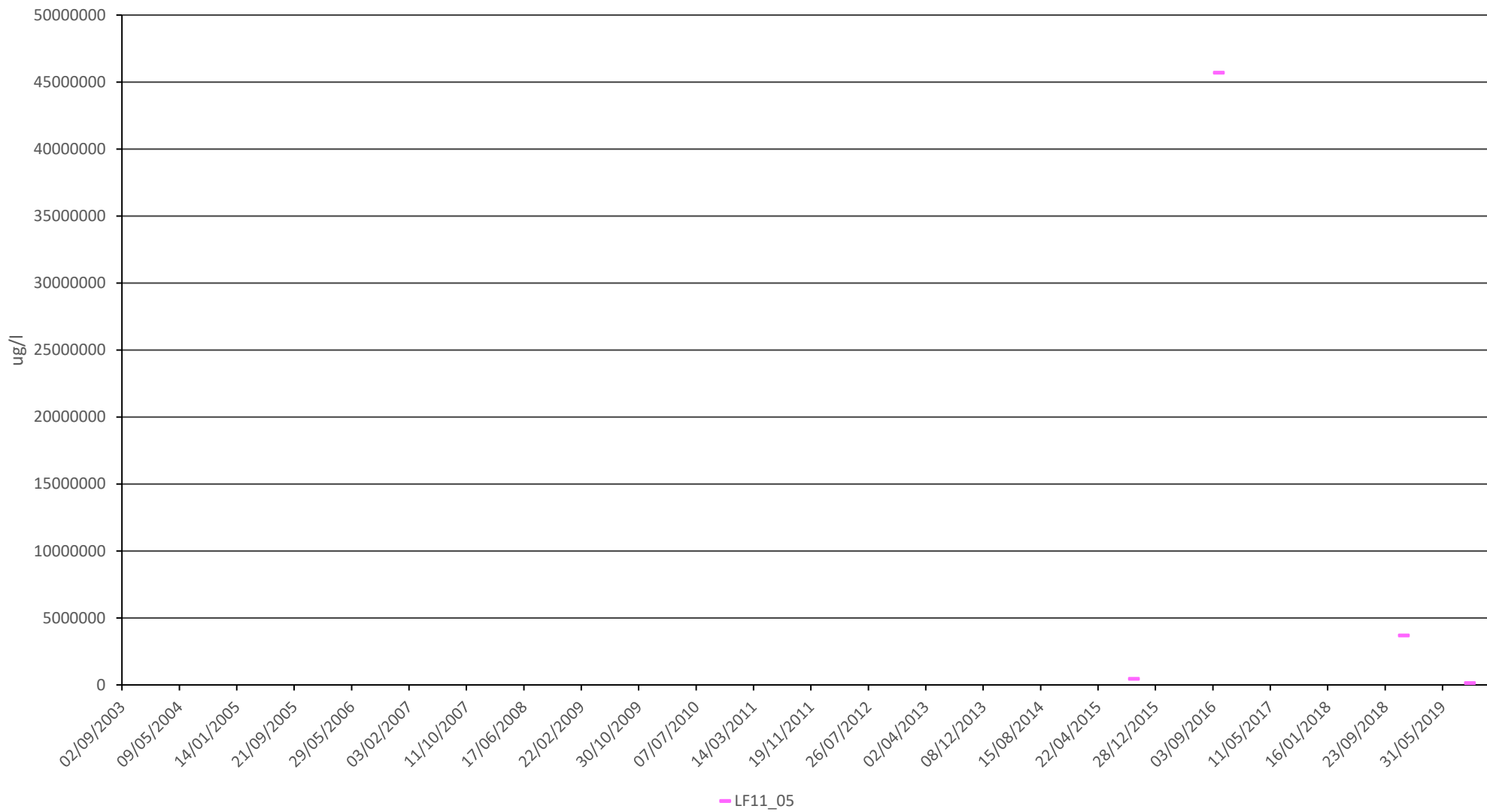

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Docksway Disposal Site
EPH in Leachate

Date	January 2020
A4 Scale	nts
Drawn	RN
Checked	VKR

Appendix
3-8




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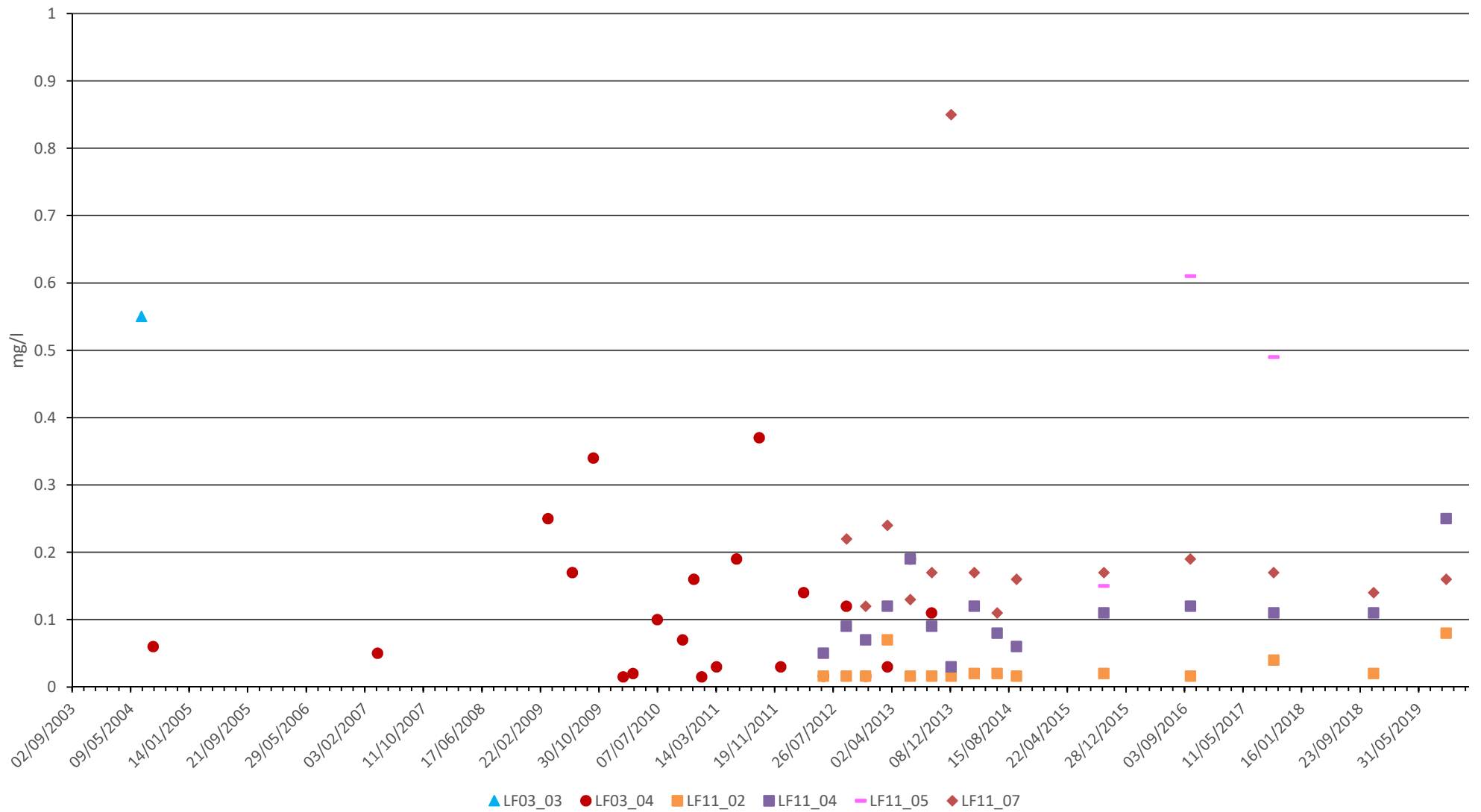
Client
Newport City Council

Docksway Disposal Site

EPH in Leachate

Date	January 2020
A4 Scale	nts
Drawn	RN
Checked	VKR

Appendix
3-9



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Client

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Docksway Disposal Site

Total Phenols in Leachate

Date February 2020

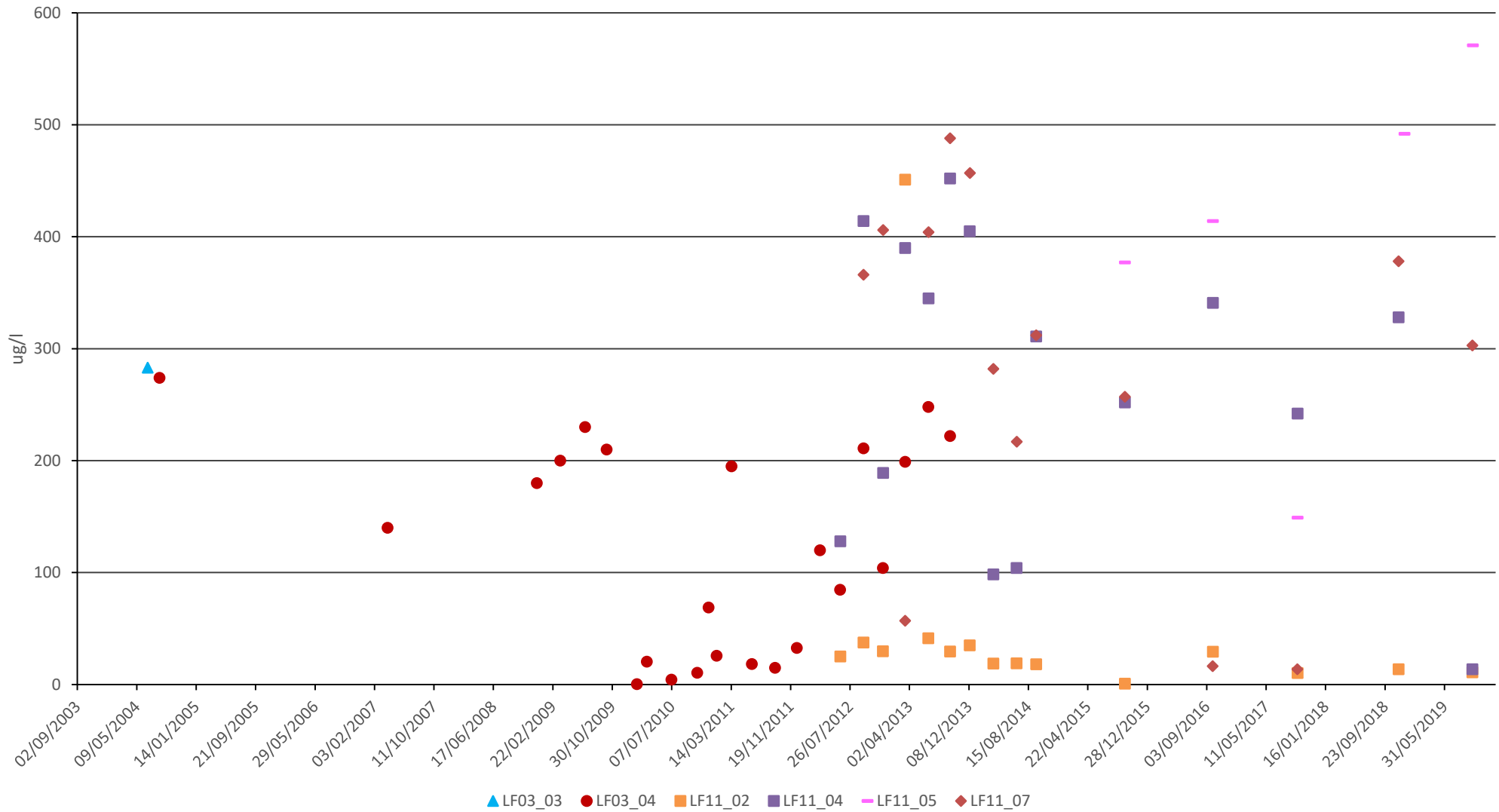
A4 Scale nts

Drawn RN

Checked VKR

Appendix

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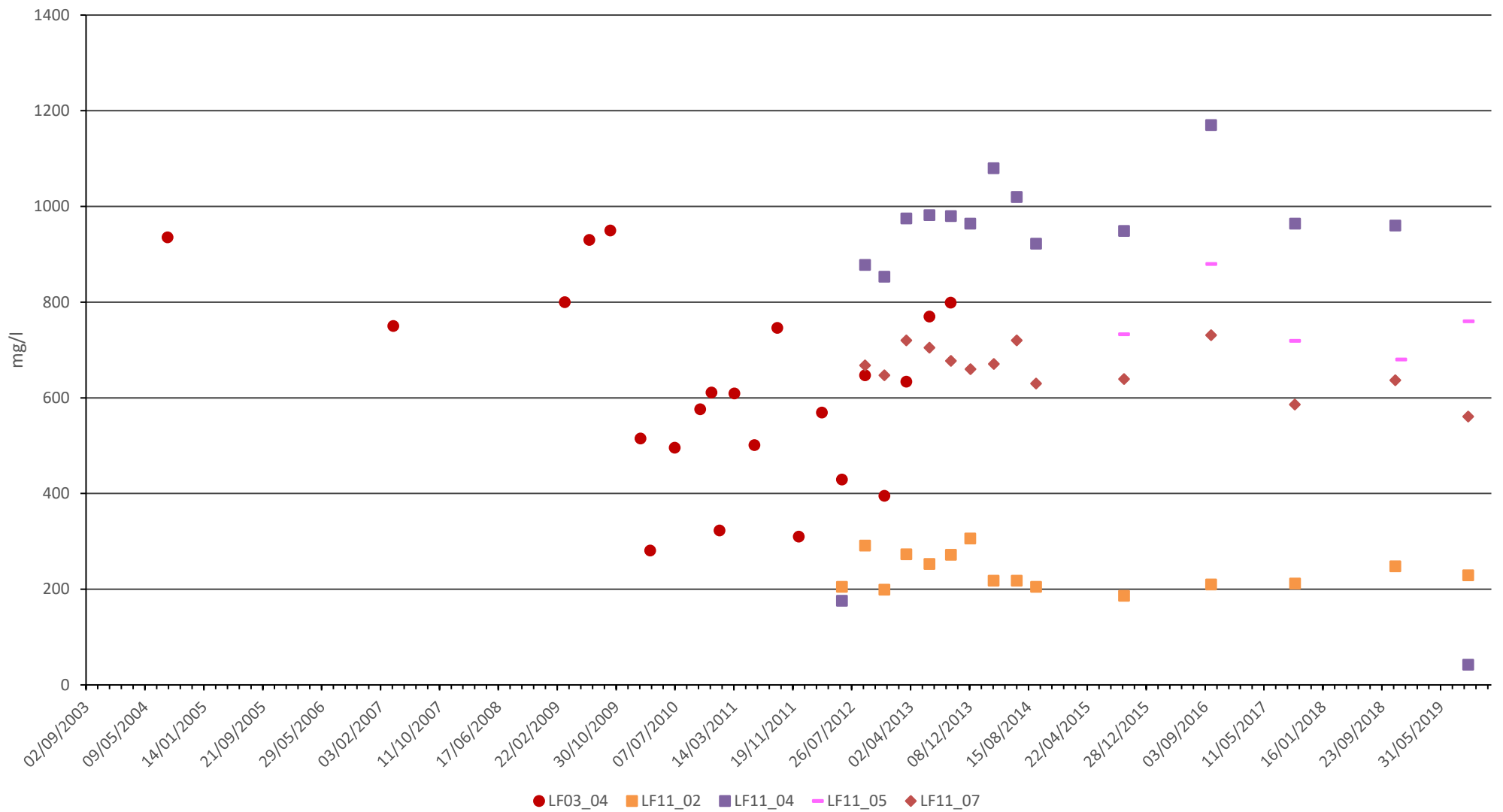
Newport City Council

Docksway Disposal Site

Nickel in Leachate

Date	January 2020
A4 Scale	nts
Drawn	RN
Checked	VKR

Appendix
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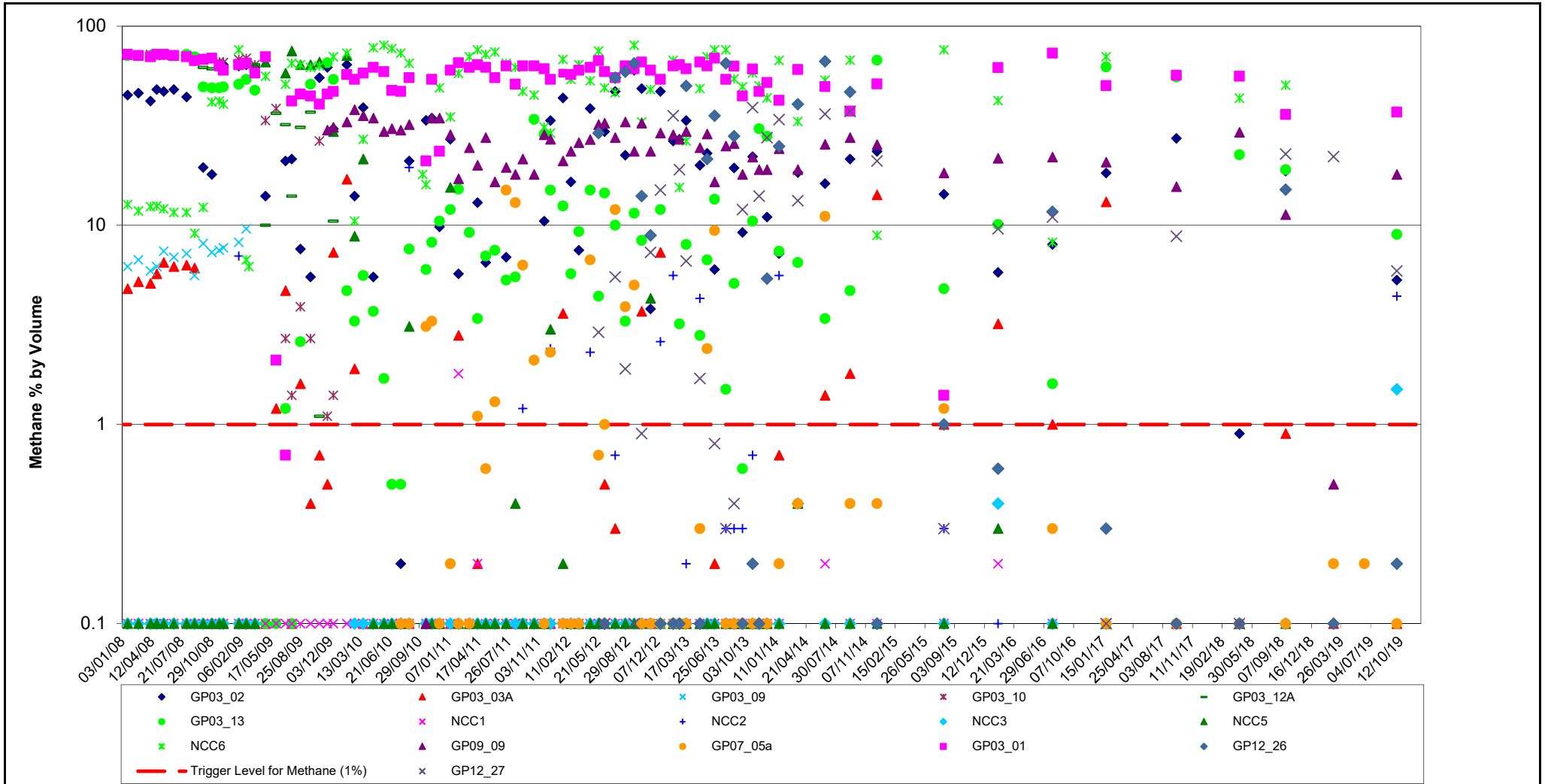
Client
Newport City Council

Docksway Disposal Site
Potassium in Leachate

Date	January 2020
A4 Scale	nts
Drawn	RN
Checked	VKR

Appendix
3-12

Appendix 4 Gas Graphs



Client
Newport City Council

Docksway Disposal Site
Methane Concentrations in Area 1 Gas Monitoring Wells

Date	February 2020
A4 Scale	nts
Drawn	NH
Checked	VKR
Appendix	4-1

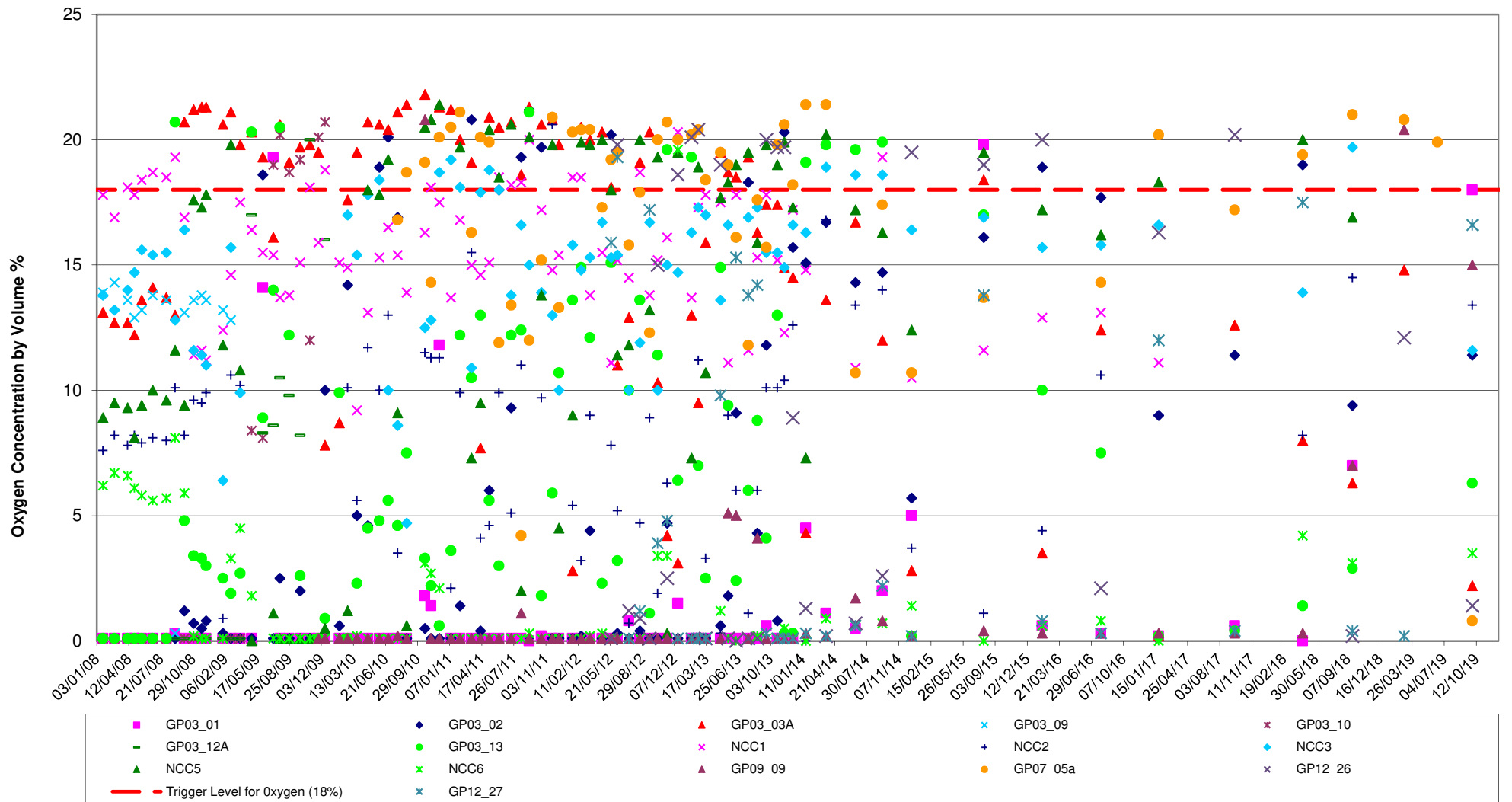


Client
Newport City Council

Docksway Disposal Site

Carbon Dioxide Concentrations in Area 1 Gas Monitoring Wells

Date	February 2020
A4 Scale	nts
Drawn	NH
Checked	VKR
Appendix	4-2



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Newport City Council

Docksway Disposal Site

Oxygen Concentrations in Area 1 Gas Monitoring Wells

Date	March 2020
A4 Scale	nts
Drawn	NH
Checked	VKR

Appendix	4-3
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Appendix 5 Infnis Annual Reports



Business Management System

Document No.:CAS 2.8
Revision No.:2
25/01/11

Annual permit report

Installation	Docksway
Permit reference	LP3135SB
Reporting period	Jan - Dec 2019
Permit Operator	Novera Energy

Author: Kate Phillips

Date: 28/01/2020

Authorised to sign as representative of the Operator

Fugitive Emissions Review		Reporting period:	Jan - Dec 2019
Installation Name:		Docksway Landfill gas utilisation plant	Permit reference
			LP3135SB
Substances Released/Potentially	Description of event and any contamination/decontamination of the site which has occurred		
Landfill gas	Details of any notifiable events have been submitted to NRW in accordance with our notification procedure		
Spillages	No significant spillages, contamination or decontamination to report for this installation		

Raw Materials (& Water) Assessment Table							
Site: Docksway		Reporting period: Jan - Dec 2019			Permit Reference: LP3135SB		
Raw Materials	Application	Current Measures to Ensure Efficiency and Waste Minimisation	Annual Quantity Used	Fate of Material	Environmental Impact Potential	Reason Alternatives are Not Practicable	Details of Process Modifications which Could Result in Savings
Landfill gas	Fuel for engines to produce electricity	Kilowatt generation from volumes processed is maximised through effective operation, maintenance and servicing of plant	Variable depending on site conditions	Combustion	Potentially flammable, explosive, toxic, asphyxiant, ecotoxic, corrosive and odorous, greenhouse gas	N/A - Combustion of landfill gas essential for environmental control	N/A - environmental benefits to be gained from conversion of methane to CO2
Lubricating oils	To ensure efficiency of utilisation plant is maintained in accordance with manufacturer's instructions	Efficient use of lubricating oil is maximised through oil analysis to identify requirement for oil changes	Oil used is continually under review as part of the budgeting process	Reprocessing	Ecotoxic and odorous	Specification determined by engine manufacturer to ensure maximum performance and efficiency	Oil used is specialised for landfill gas fuel as recommended by the OEM. Oil change intervals are based on oil analysis therefore maximising efficiency and minimising use
Water	Coolant for engine block and domestic water supply	Cooling water is recirculated around the engines to maximise efficiency and minimise consumption	No water supply on site.	Treatment	Inert	N/A - Inert therefore best practicable environmental option	Re-use of water for coolant purposes ensures volumes used are as low as reasonably practicable. Cleaning practices assessed and minimal volumes used, cleaning practices are infrequent.
	Hygiene purposes	handwashing and (where available) toilet facilities		where installed toilet waste is removed from site and treated as sewerage	Inert	n/a	n/a
Glycol	Antifreeze for use in coolant water	Glycol is recirculated around the engines to maximise efficiency and minimise consumption	Glycol contained within enclosed-loop system is drained into a container for re-use. OEM* recommends change of glycol every 20,000 hours. Infnis policy is to change following natural depletion or contamination.	Reprocessing	Toxic, ecotoxic	Specification determined by engine manufacturer to ensure maximum performance and efficiency	Antifreeze mix is specific to engine type and pre-determined by the OEM*. Levels are topped-up following natural depletion or contamination
Battery Acid	In batteries used for engine start-up and to provide back-up power to ensure rapid restart following any loss of mains power supply	Battery use is essential minimised to the applications listed (see left)		Recycled	Corrosive	Portable electrical supply required for start-up	Minimal use of battery during start-up only therefore opportunity for savings is insignificant

*OEM: Original Engine Manufacturer

Waste Minimisation, Recovery and Disposal Assessment

Installation Name: Docksway Gas Utilisation Plant	Permit Reference: LP3135SB	Reporting period: Jan - Dec 2019
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Waste Stream	Application/Source	Current Measures to Ensure Efficiency and Waste Minimisation	Fate of Material	Reason Alternatives are Not Practicable	Details of Process Modifications which Could Result in Savings
Oil Filters (205ltr Drum)	Engine maintenance	Predetermined by manufacturers' recommendations to ensure efficiency	Reprocessing	Oil and filtration devices predetermined by manufacturers to ensure efficiency	Not applicable: oil filters changed at pre-determined life based on oil analysis and differential pressure
Oil Contaminated Rags & Absorbents (205ltr Drum)	Engine maintenance and housekeeping	Control measures in place to prevent spillage	Reprocessing	As above	No further modifications considered possible: Preventative maintenance and procedural practices minimise spillage and the requirement for oil absorbency products
Waste Engine Oil (Bulk)	Engine maintenance	Efficient use of lubricating oil is maximised through oil analysis to identify requirement for oil changes	Reprocessing	As above	No further modifications considered possible: Oil used is specific to the landfill gas fuel in use and as recommended by the OEM*. Oil change intervals are based on oil analysis therefore maximising efficiency and minimising use
Batteries	Engine maintenance	Recharged	Recycled	Batteries essential for engine start-up and ensuring rapid restart	Batteries only replaced when they no longer hold a charge. Maintenance practices are in place to lengthen battery life
Fluorescent Tubes	Lighting	Replacement when faulty or damaged	Reprocessing	Alternatives not considered practicable due to warm-up time of energy saving bulbs	Tubes are only replaced when they have expired
General Waste	Packaging	Waste streams which can be reprocessed or recycled are identified and segregation facilities provided where appropriate	Disposal	Materials not segregated/ reprocessed are produced in small quantities only making alternatives not viable	Not applicable as a result of small quantities only being produced
Waste water/effluent	Welfare facilities	Facilities are maintained to ensure minimal water usage	Road tanker to treatment plant	Connection to mains sewer not practical - quantities produced are small.	Not applicable as a result of small quantities only being produced

*Original Engine Manufacturer

Annual Reporting of Other Performance Indicators

Installation:	Docksway Landfill Gas Utilisation Plant	Permit Reference:	LP3135SB
Parameter	Jan - Dec 2019	Units	
Flare operation hours	1107	hrs	
Gas engine downtime hours	962.0	hrs*	
Gas engine operation hours	7798.0	hrs	
Volume of landfill gas combusted	484,812	m3 (treated by flare)	
	2,953,545	m3 (treated by engines)	
	3,438,356	m3 (total treated by engines & flare)	

Operator's Comments:

Please contact permit-compliance@infinis.com for any queries regarding the above

Reporting of Performance Indicators (Form Ref: PI1)

Installation:	Docksway Landfill Gas Utilisation Plant	Permit Reference:	LP3135SB
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Annual Production/Treatment (MWh)

Total production of energy	5126
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Environmental Performance Indicators

Parameter	Annual Average Jan - Dec 2019	Units	Trends in Environmental Performance	
			2017	2018
Total oxides of nitrogen (expressed as NO2) emission	7.8	Kg/MWh	1.2	2.1
Total carbon monoxide emission	15.7	Kg/MWh	4.1	4.6
Total engine downtime (downtime hrs/available operation time in hrs)	11.0	%	8.8	8.8

Reporting period	Energy Imported (Primary Energy Usage) (MWh)	Parasitics (MWh)	Energy Exported (MWh)	Energy Used on Site (MWh)	Site Efficiency
Jan - Dec 2019	16	262	4864	278	30.9

*site efficiency has been calculated as follows: ((Engine efficiency (%) x (gas to generation/total gas) x (power export / (power generation + imported power))).

Installation:	Docksway Landfill Gas Utilisation Plant	Permit Reference:	LP3135SB
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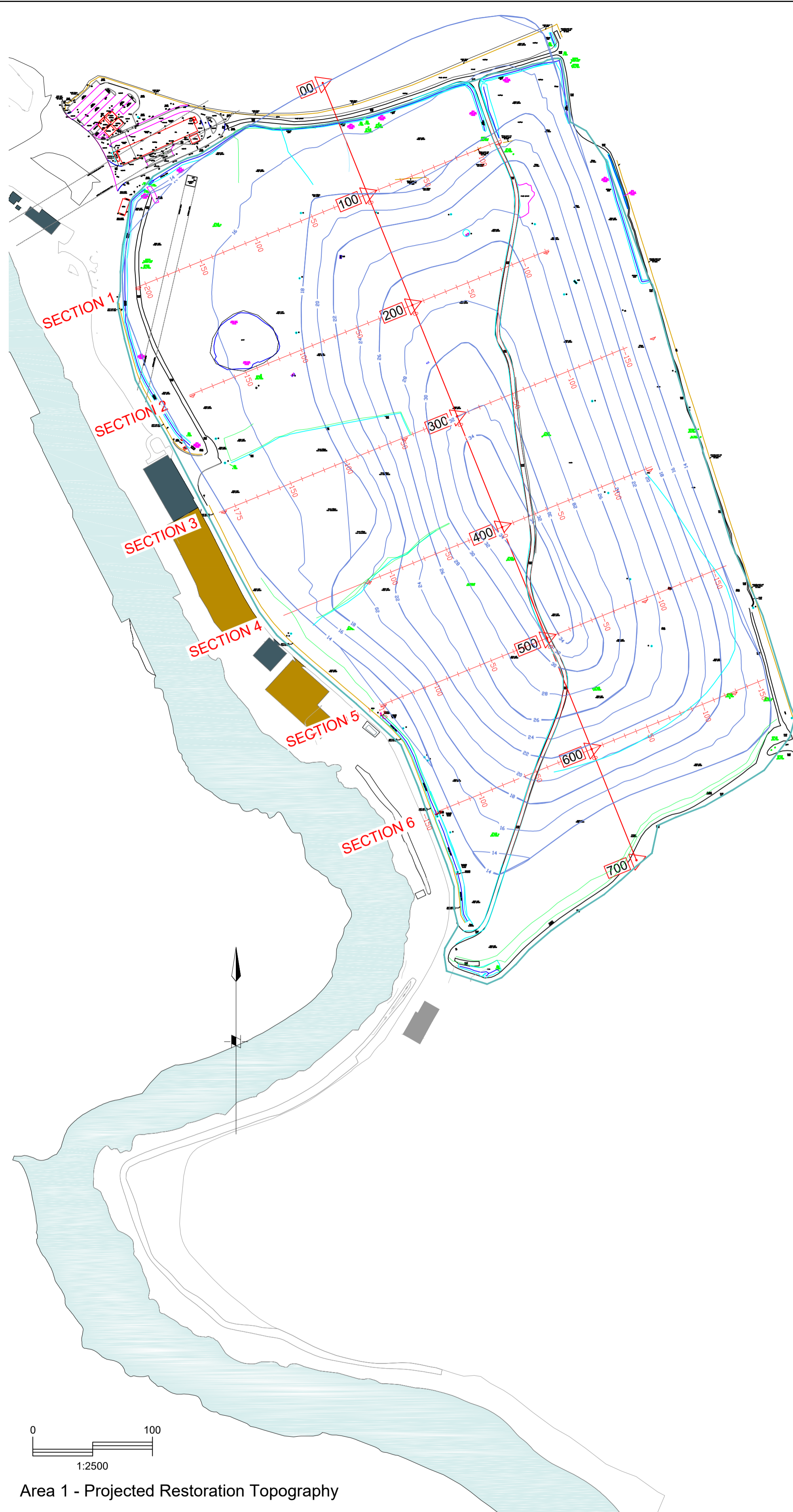
Accident Management Plan Review	Jan - Dec 2019
Date of next review	
Reviewed monthly following a review of notifiable events	

Permit requires that the accident management plan is reviewed at least every 2 years, or as soon as practicable after an accident (whichever is the earlier).

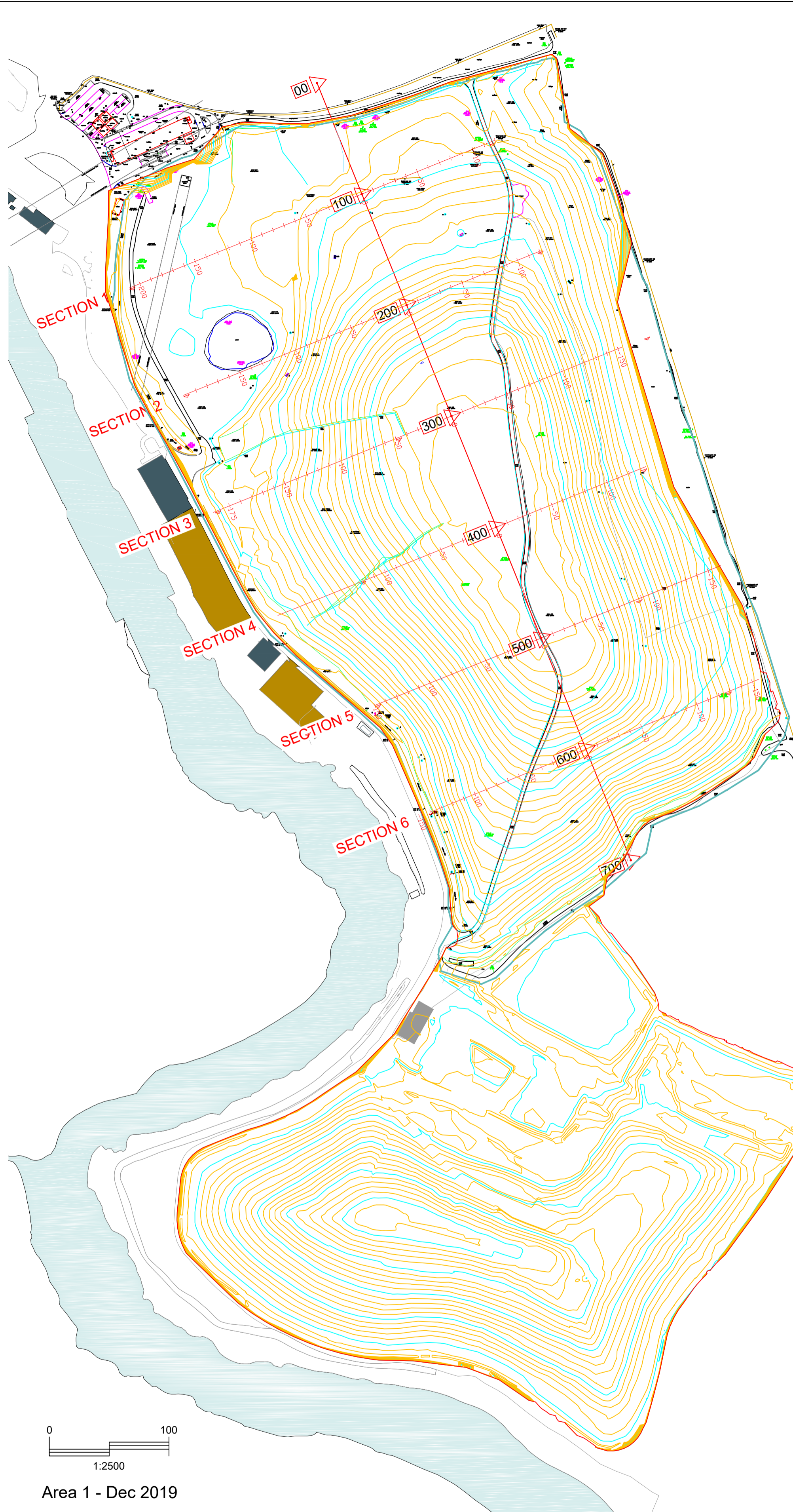
Operator's comments:
No accidents occurred during this period which would require amendment to the Accident Management Plan for this installation.

Installation: Docksway Landfill Gas Utilisation Plant	Permit Reference: LP3135SB
Emissions to Air Reporting Jan - Dec 2019	
Report Submission Date	20-May-19
Submitted to	David Willey & Elizabeth Parr

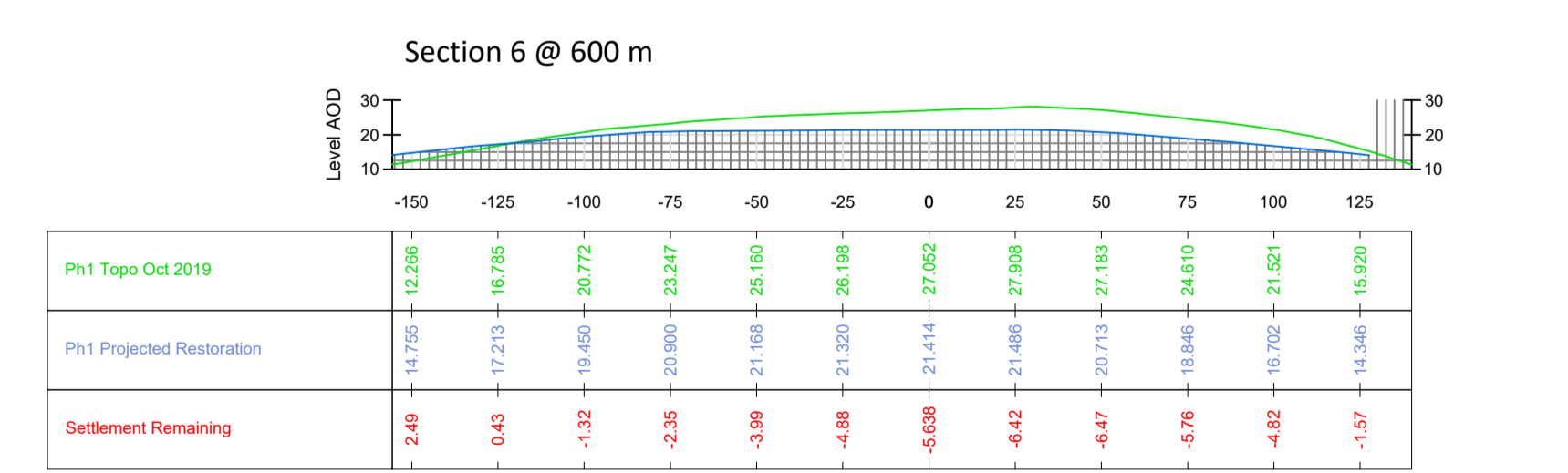
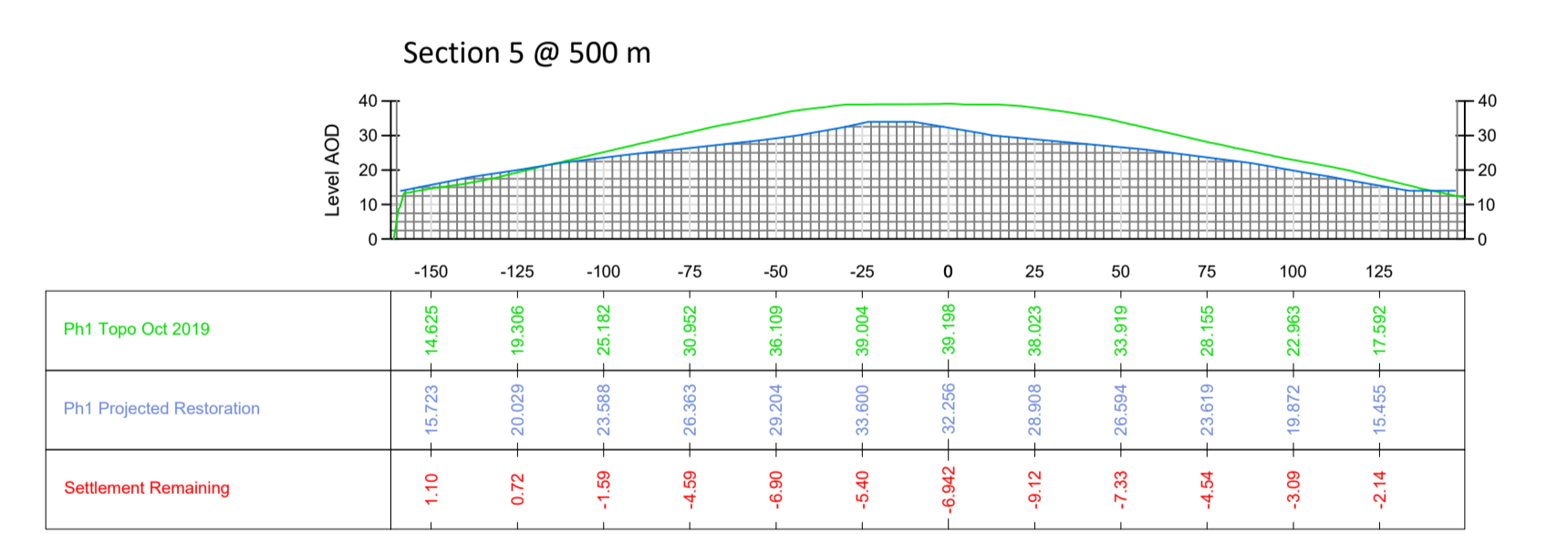
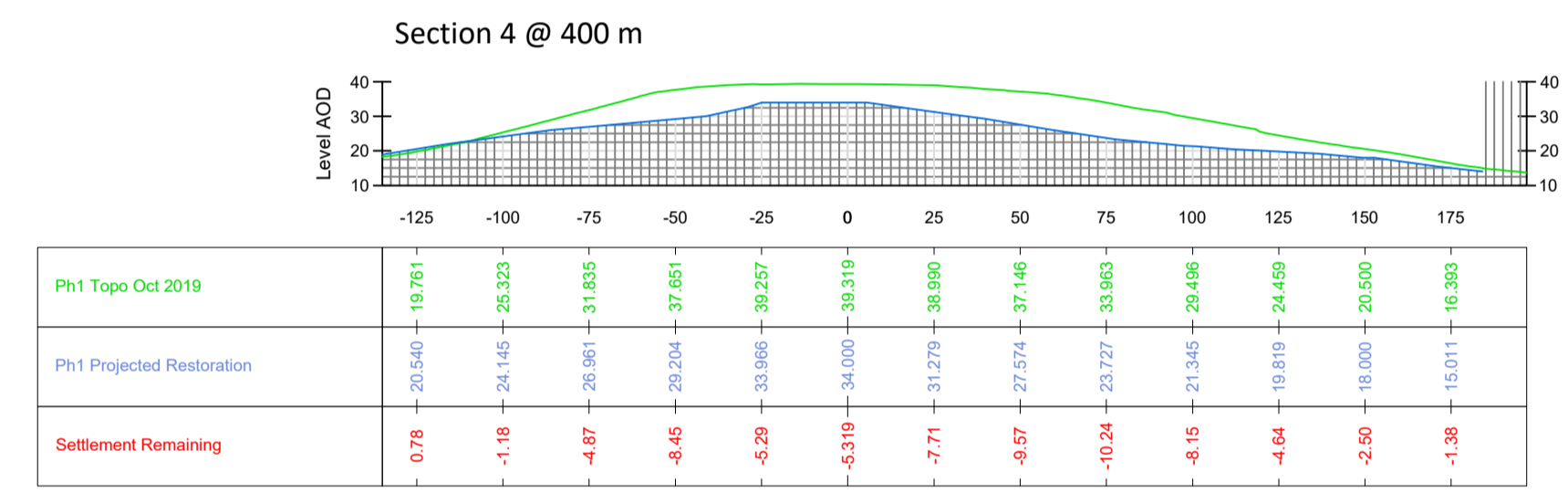
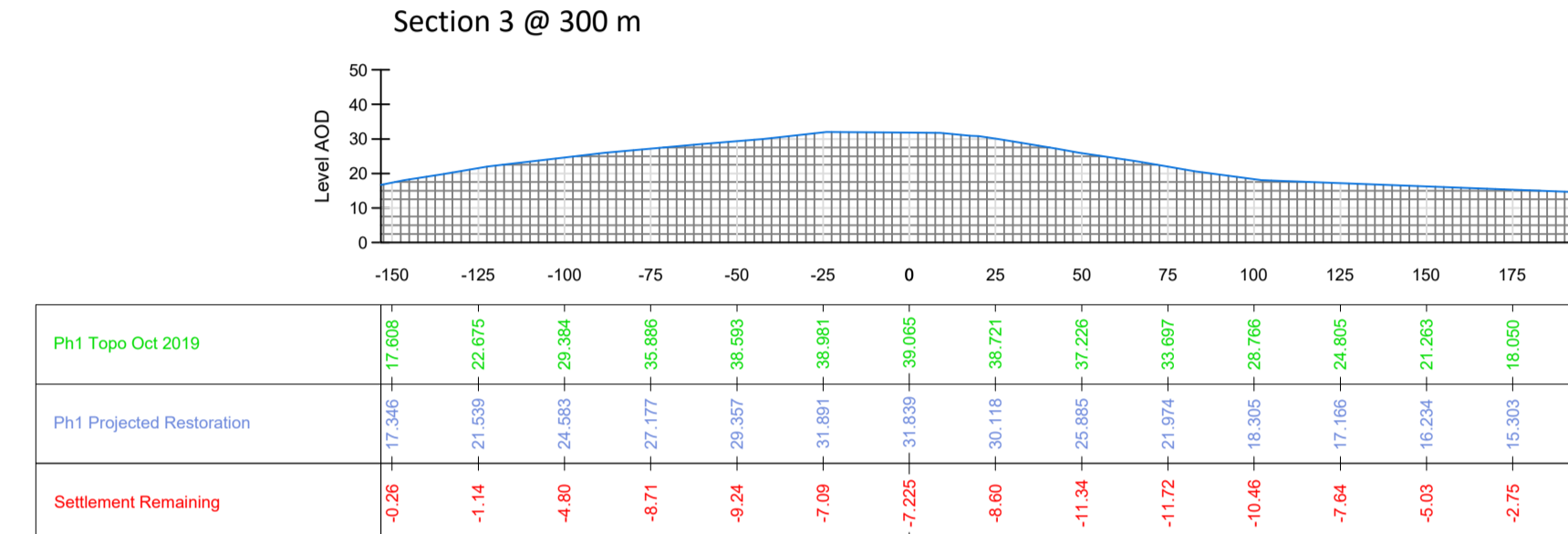
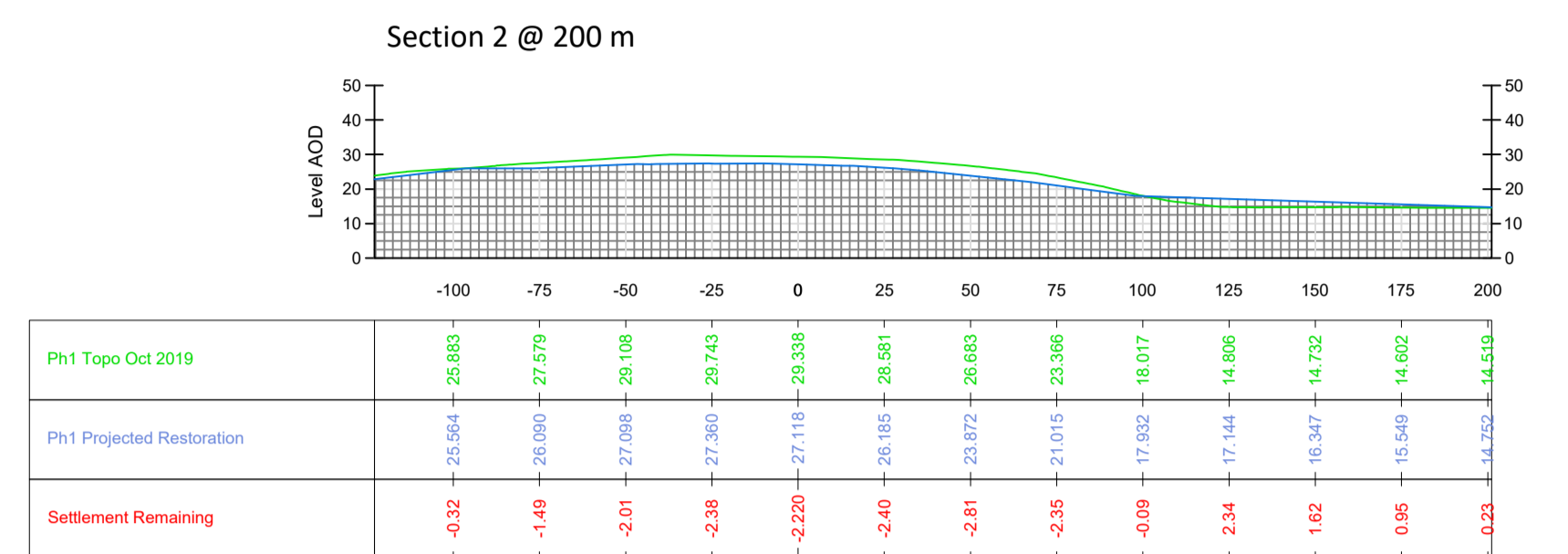
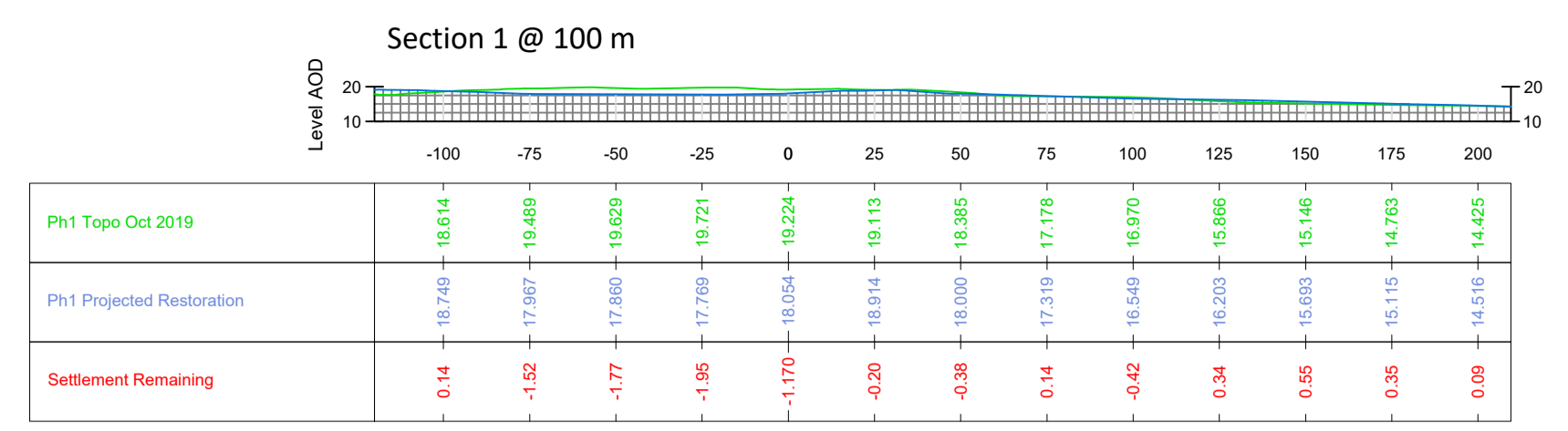
Appendix 6 NCC Survey and Cross Sections



Area 1 - Projected Restoration Topography



Area 1 - Dec 2019



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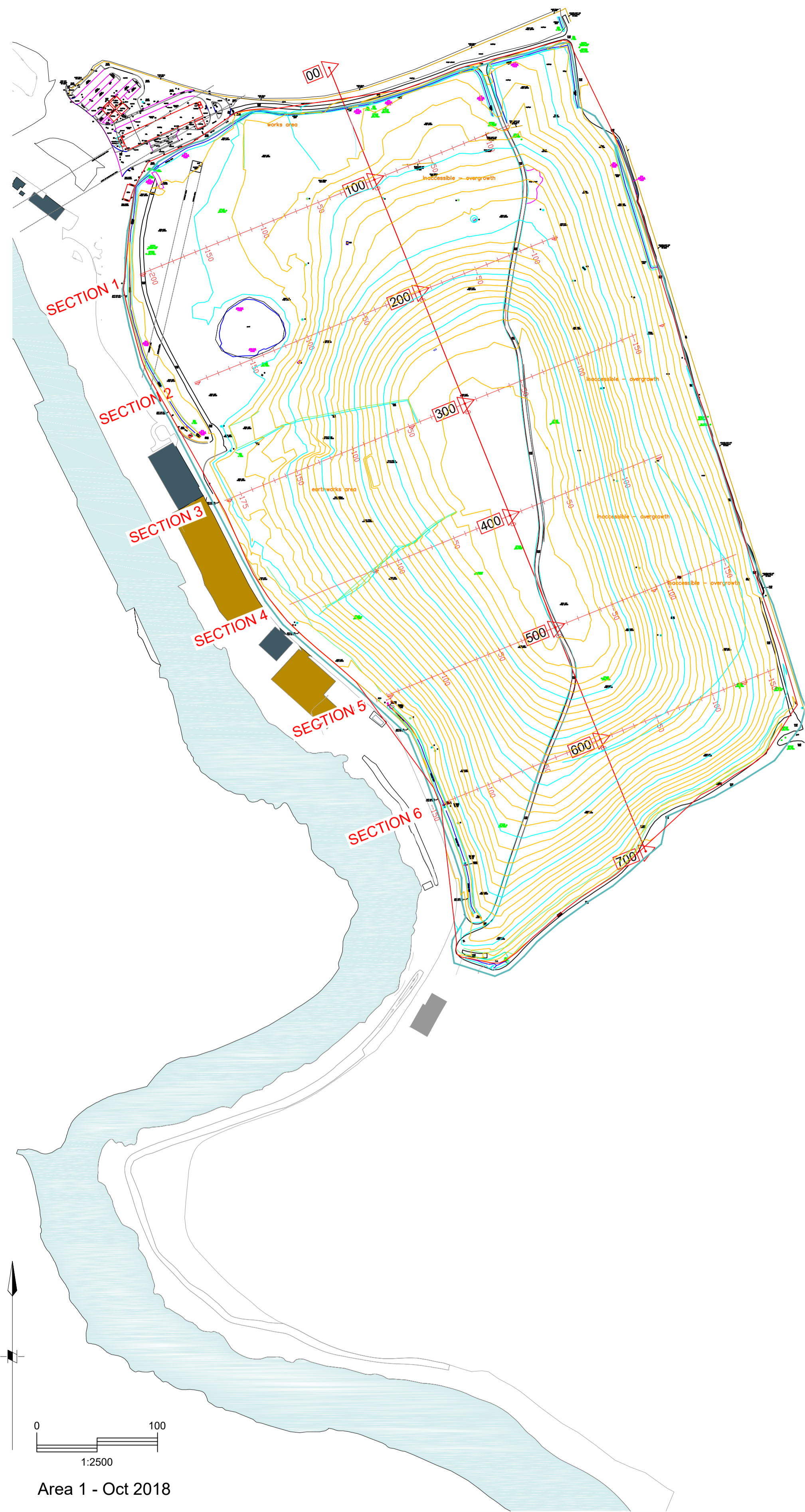
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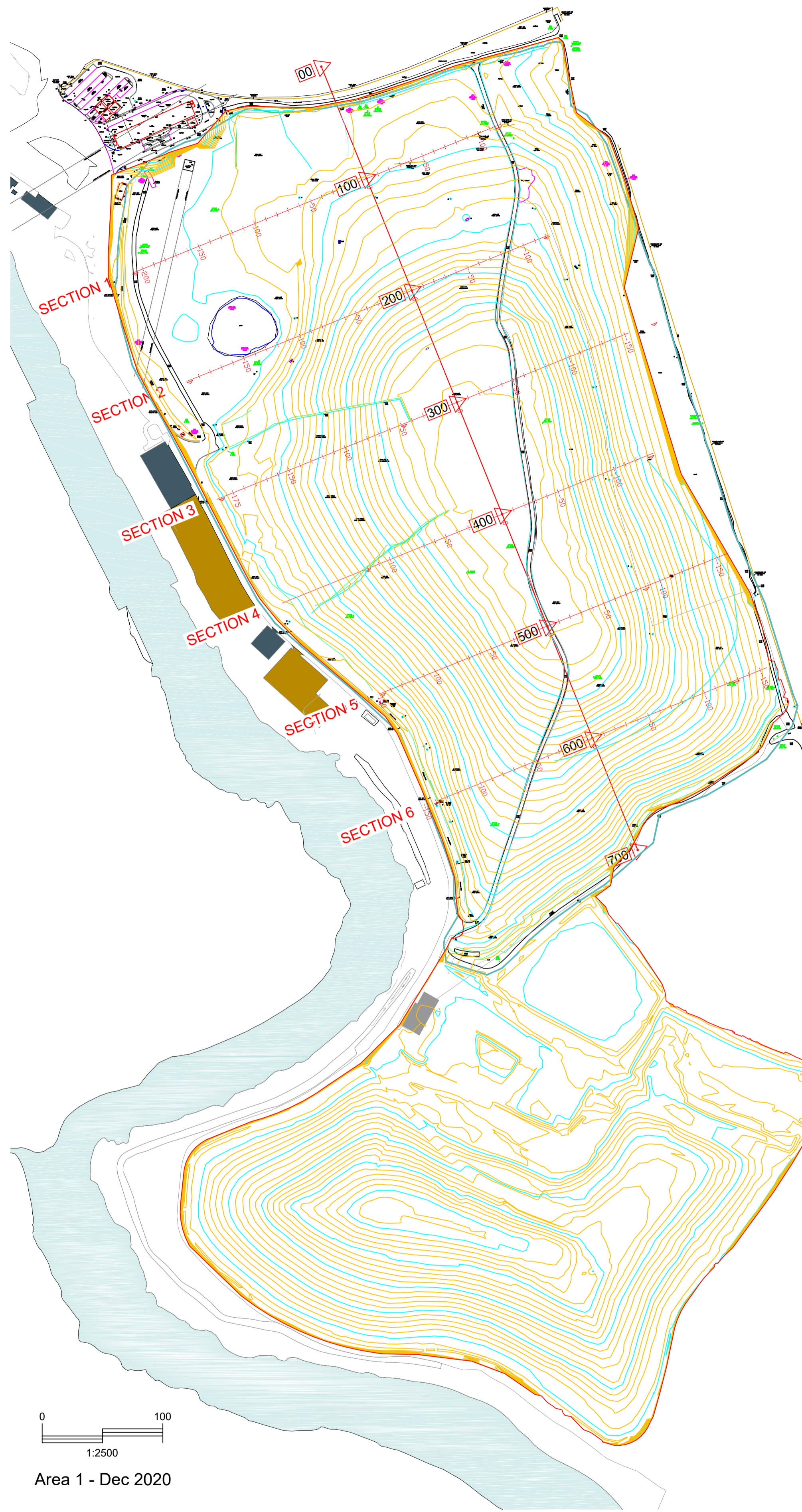
Streetscene
 John Lamb
 Head of Streetscene
 Newport City Council
 Civic Centre, Newport
 South Wales, NP20 4UR.
 Telephone: 01633 656656
 Email: streetscene@newport.gov.uk

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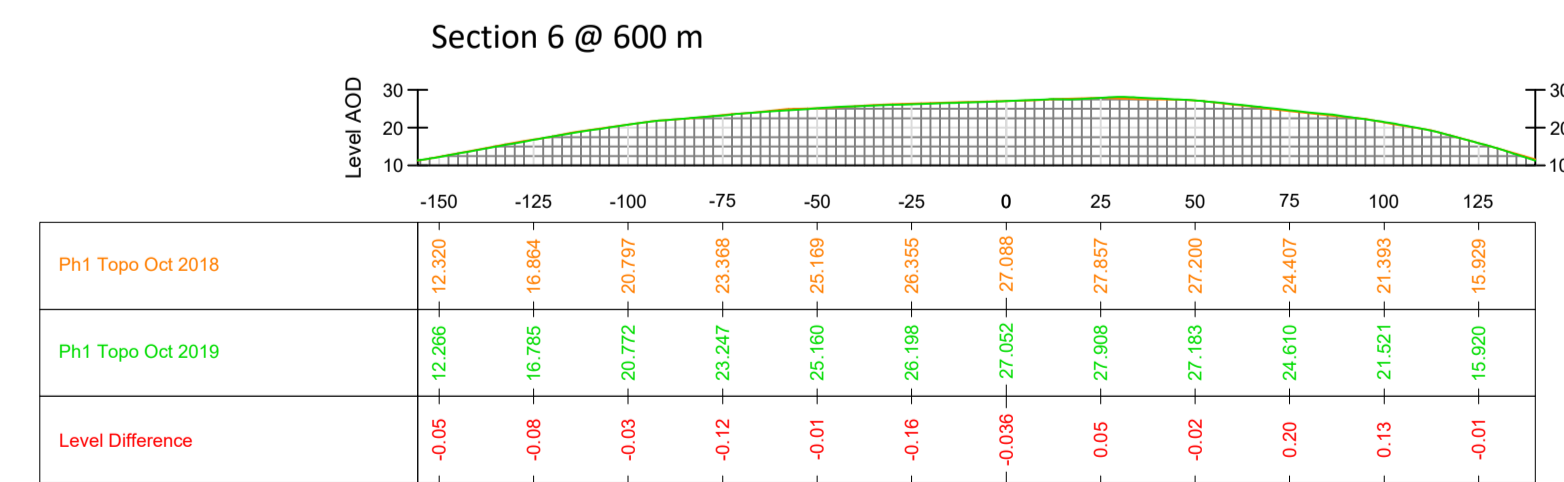
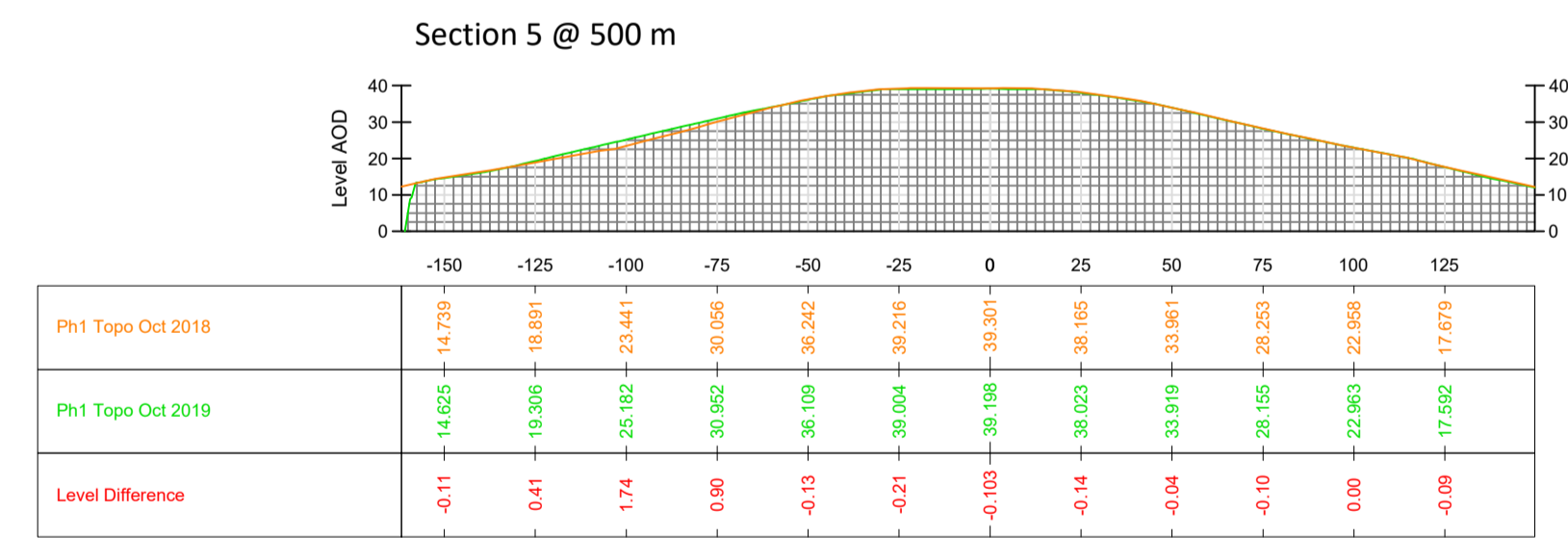
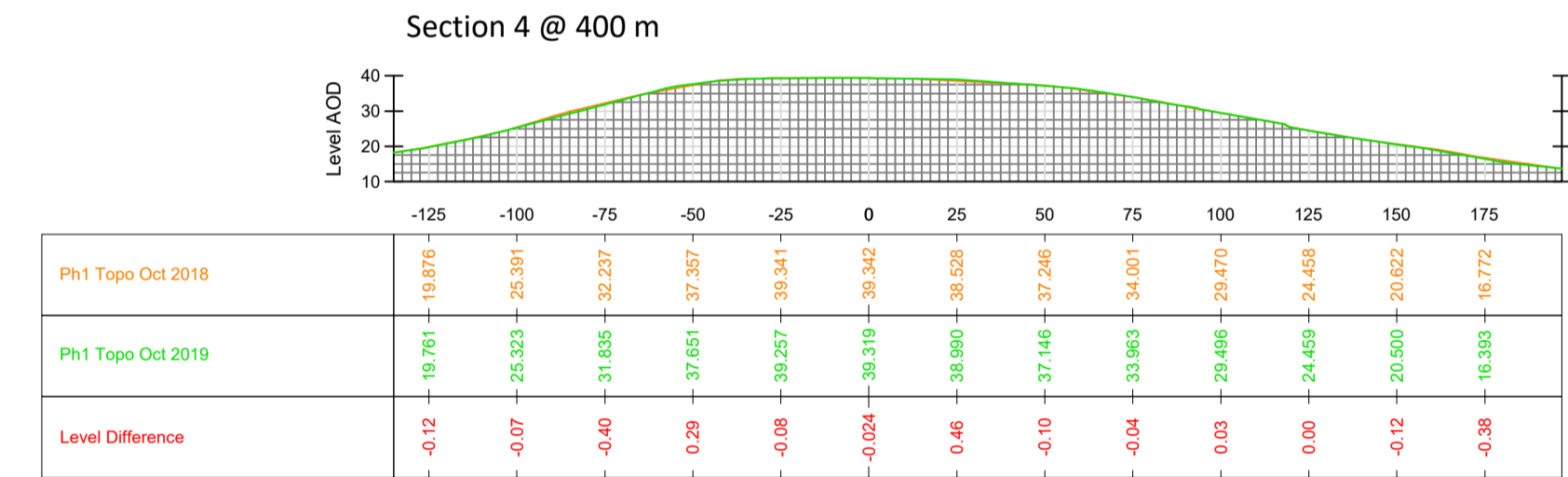
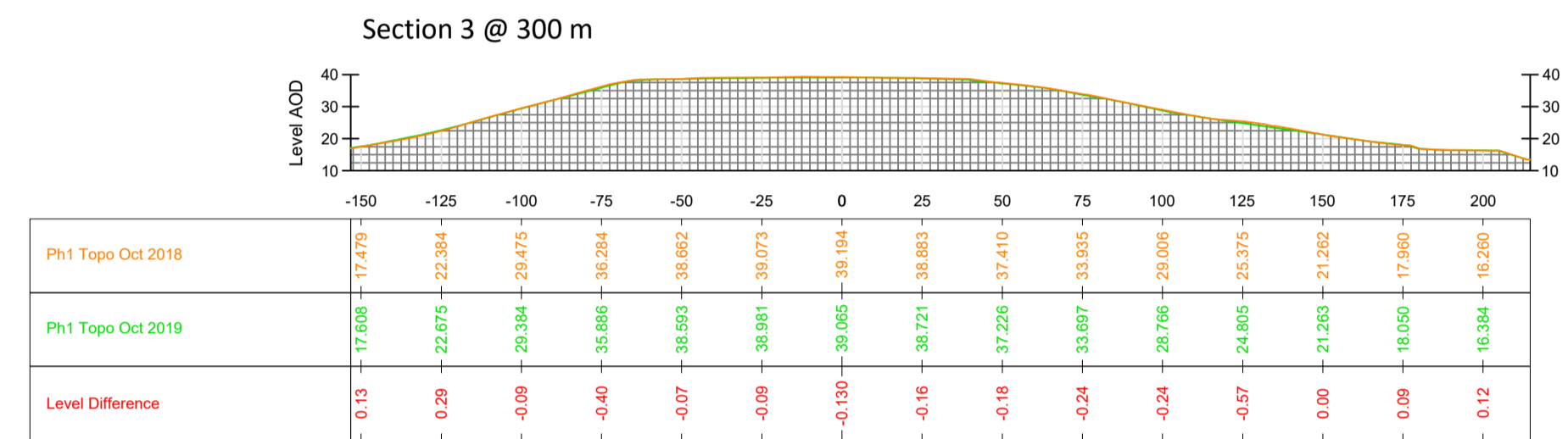
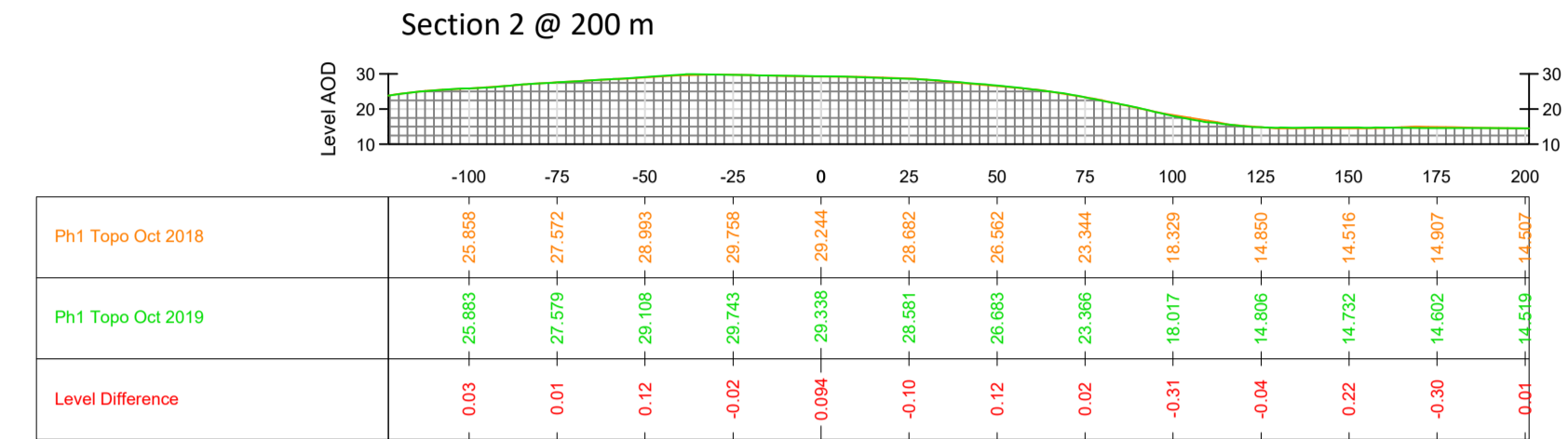
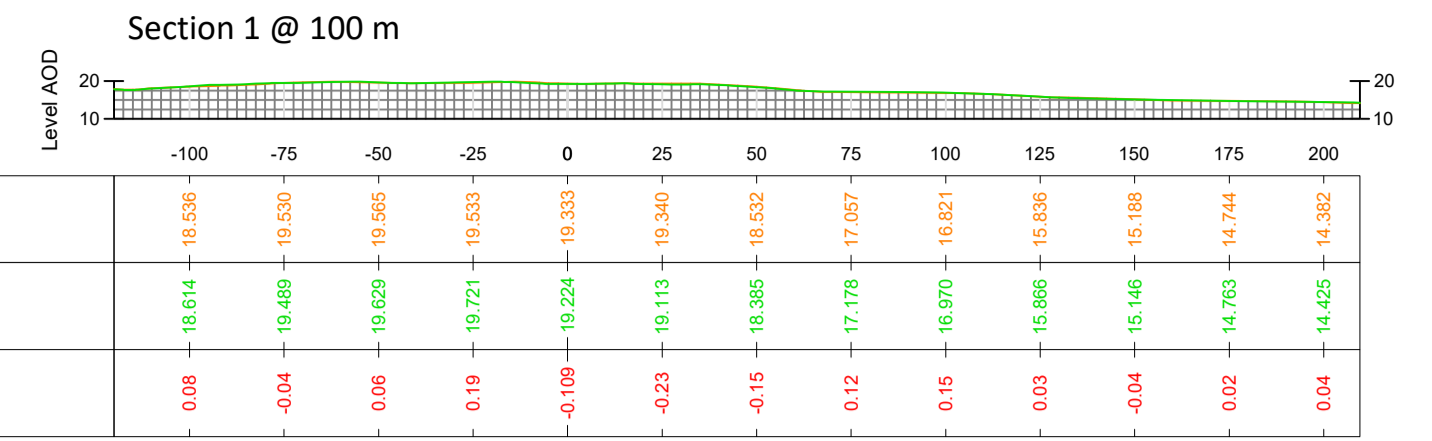
Project	Docksway Waste Disposal Site	File No.	Status:
Area 1 AEPR 2019 - Settlement			
Drawn By	MDH	Checked By	Approved By
Date	03.02.20	Date	Date
Scales			
Drawing No.	1475_AEPR_PH1_19_01		



Area 1 - Oct 2018



Area 1 - Dec 2020



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NOTES

Rev	Details	Dr	Ch	Ap	Date

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Project
Docksway Waste Disposal Site
Area 1 AEPR Oct 2018 vs Dec 2019

File No. 1475	Status:	
Drawn By MDH	Checked By	Approved By
Date 03.01.20	Date	Date
Scales		
Drawing No. 1475_AEPR_PH1_19_02		