

Compliance Assessment Report

Report ID:
CAR_NRW0036279

This form will report compliance with your permit as determined by an NRW officer

Site	Hafod Quarry Landfill Site	Permit Ref	PP3139GB		
Operator/Permit holder	Enovert North Limited				
Regime	Installations				
Date of assessment	06/02/2020	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	Landfill engineering - Retro Leachate Well LMP2b Construction Quality Assurance				
Lead officer's name	Oakes, Ian				
Accompanied by					
Recipient's name/position	Ian Craven/ Area Manager	Date issued	03/03/2020		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
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KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Hafod Quarry Landfill site retro leachate well LMP2b construction quality assurance (CQA)

We have reviewed the 'Construction Quality Assurance CQA Plan and Method Statement for the Drilling of Replacement Leachate Well' for Hafod Quarry Landfill Site, submitted by Enovert in January 2020. The documents submitted by the operator include the CQA procedures to be adopted during the works, together with drawings showing the re-drill location and construction details. It should be noted that after receipt of the CQA plan the construction details for the well have been revised and a replacement drawing for HAF214c (labelled HAF214d) has been received to replace the original drawing.

The proposals contained within the document comprises a re-drill for a failed leachate monitoring well. Leachate monitoring point 2 (LMP2), which was installed during the construction of the landfill was replaced by LMP2a when it became defective. LMP2a was retro drilled alongside the original well and appears to have been constructed from HDPE. This has also failed and the current proposal is to replace this with LMP2b which will be fabricated from perforated steel casing. The well is to be drilled onto the same target pad as LMP2a.

The appointed survey company for the retro-drilling work is StaffSurv, the company that has carried out all survey work since Cory purchased the site. Accordingly, we are confident that the survey work and drawings will be carried out to the same coordinate system and datum and that the survey control set around the site will be consistent. This provides confidence that the position and level data will be reliable and accurate.

The retro-drilling will have to be carried out at a location directly above the target pad cast onto the basal liner. The drawing attached to the Plan shows the location of the target pad so we are satisfied that the position of the drill hole is planned correctly. Information supplied by the Operator, following survey work at the weekend, shows that the survey has been carried out immediately before the drilling work so that the position is correctly set-out and that the starting level of the drilling has been established.

The Plan proposes that the hole will be drilled to a position 0.5m above the target levels to avoid the possibility of puncturing the liner. The approach to surveying provides a high degree of confidence that this will be executed correctly. However, we note that an emergency procedure is also included should the liner be struck. The liner for this site is a 1m thick recompacted mineral overlain by a drainage gravel blanket so the risks of puncturing the liner seem very remote. The emergency plan in any event appears to be a suitable means to mitigate this very small risk.

The casing used for the replacement well is a partly perforated steel casing, with a pattern of perforated sections separated by plain sections. The replacement well is required to provide leachate monitoring so that the leachate head on the basal liner can be assessed: accordingly, the perforated sections at higher levels are not required to perform this function. The operator wishes to provide a gravel pack extending to the surface seal with perforated sections to allow the passage of gas rather than for the collection of leachate. Given this purpose, the revised design shown on HAF214d is appropriate.

The scope of the CQA Plan and the CQA procedures in the document are suitable for the proposed works and will ensure a high degree of planning, supervision and record keeping, in line with best practice. We are therefore satisfied that the document (with subsequent submissions) can be approved and the works can commence as described.

EPR Compliance Assessment Report

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Operator/Permit holder	Enovert North Limited	Date	06/02/2020

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.