

Compliance Assessment Report

Permit number	MP3330WP	Operator name	Resources Management UK Limited
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Site name	Withyhedge Landfill
Site address	Withyhedge Landfill, Bowlings House, Rudbaxton, Haverfordwest, Pembrokeshire, SA62 4DB
Assessment type	Report review

Date of assessment	14/10/2020	Time in	N/A	Time out	N/A
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Parts of permit assessed	Pre-operational Measures
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NRW Lead officer	Guy Baskerville	Accompanied by	N/A
Report sent to – Name and position	Bryan Cameron Site Manager	Date	16/10/2020

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
A1 Specified by permit	Assessed or assessed in part (A)	

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

Total number of non-compliances recorded	Total non-compliance score
0	0

2. What action is required?

No action required

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecutions and/or suspension or revocation of your permit.

No non-compliances noted

4. Details of our assessment

The purpose of this Compliance Assessment Report (CAR) is to record the findings of Natural Resources Wales' (hereafter *NRW*) assessment of Resources Management UK Limited's (hereafter *RML*) submission to satisfy the requirements of *Pre-operational Measure 4*.

Condition 2.5.1 of the environmental permit states:

The activities shall not be brought into operation until the measures specified in Schedule 1 table S1.4A have been completed.

Table S4.1A of Schedule 1 to the environmental permit is partially reproduced below.

Table S1.4A Pre-operational Measures	
Reference	Pre-operational Measures
4	Prior to any recirculation of leachate within the boundary of the landfill, the operator shall submit to the Environment Agency (for approval) an updated leachate management plan which shall include: • The volume of leachate to be recirculated including as assessment of the potential impact of such activity to groundwaters, surface waters and generation of odours; • Evidence that any proposed recirculation system is designed to minimise air ingress into the landfill; • A review of the pre-treatment requirements of leachate, prior to disposal and / or recirculation (unless already undertaken and approved as part of the Improvement Programme) and; • The Landfill gas extraction system has been installed to collect and treat any gas generated as a result of recirculation

On 12 October 2020 RML submitted (via consultants *TerraConsult Limited*) the following report(s):

- **Withyhedge Landfill Site Leachate Management Plan. Report No. 4756/R01/02**

Natural Resources Wales have assessed the above report and confirm that it adequately satisfies Pre-operational Measure 4 as described in Table S1.4A of Schedule 1 to the Environmental Permit.

Please accept this CAR as formal notice of our approval of the updated Leachate Management Plan.

Upon the issuing of this CAR the updated Leachate Management Plan is to be deemed an Operating Technique as described in condition 2.5.1(a) of the environmental permit.

Condition 2.5.1(a) of the environmental permit states:

The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Agency.

At the next environmental permit variation, the updated Leachate Management Plan will be formally added to the list of Operating Techniques in table S1.2 of Schedule 1 to the environmental permit.

[ENDS]

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

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 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.