	EPR Compliance Assessment Report	Report ID: BU7766IC/0249819			
This form will report compliance with your permit as determined by an NRW officer					
Site	Bryn Posteg Landfill EPR/BU7766IC		Permit Ref	BU7766IC	
Operator/ Permit holder	Sundorne Products (Llanidloes) Ltd				
Date	22/06/2015		Time in	10:00	Out 15:30
What parts of the permit were assessed	Audit of landfill gas infrastructure and waste acceptance procedures.				
Assessment	Audit	EPR Activity:	Installation	X	Waste Op
					Water Discharge
Recipient's name/position	David Williams / Technical Manager				
Officer's name	Aled Zachary		Date issued	07/09/2015	

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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			Condition(s) breached
a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	C3	3.4.1
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	A	
	2. Management system & operating procedures	N	
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	A	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	4
------------------------------------	---	---	---

If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Natural Resources Wales Staff present:

- Aled Zachary
- Andi Kemp
- Rhys Ellis

Waste Acceptance and Control Procedures, Duty of Care documentation.

Waste acceptance procedures for incoming loads of waste material were reviewed. All routine loads received at the site proceed to the weighbridge where duty of care documentation is checked, loads are then directed to the MRF and discharged. At this point the waste materials being accepted can be verified for waste types and to ensure they meet the listed waste types in the permit. As the majority of incoming waste materials are handled in this manner this gives extra reassurance that non-conforming wastes are not deposited directly in the active landfill cell. Extra checks are carried out on non-routine deliveries or new customers disposing of material at the site.

Staff on the weighbridge appeared to have a good understanding of waste acceptance requirements, although a hard copy of procedure(s) were not available for inspection.

Recommendations / Action: Waste Acceptance and control procedures should be available in the weight bridge at all times in case of a change in weigh bridge personnel. Please provide a copy of the most up to date

Landfilling Operations, Gas Infrastructure.

Inspection of the active tipping cells 9D(i) and 9D(ii) was carried out during the audit. Landfill gas odour was present along the SE boundary of Cell 9D(i) and gas could be seen bubbling under pressure through pooled leachate adjacent to the haul road in this area. Assessment of the levels of fugitive gas emissions was not possible due to the Gazomat instrument not being available. Inspection of 3 new gas well installed on Cell 9D(i) and 3 new wells on the Southern flank of Cell 9C. These wells had yet to be formally connected to the gas extraction infrastructure but this was planned to occur soon after the visit. All wells appeared to show signs of good gas pressure.

Requirement - Condition 3.4.1 requires that emissions from activities shall be free from odour at levels likely to cause annoyance outside of the site, as perceived by an authorised officer of the Agency, unless the operator has used appropriate measures to prevent of where that is not practicable to minimise the odour

Findings - Presence of strong landfill gas odour on the SE flank of cell 9D(i). It was also noted that leachate was being pumped from a collection sump on the Southern flank on cell 9D(i), which was subsequently being pumped down the eastern flank of Cell 9C. This has the potential to cause odour and / or lead to slope instability in this areas.

Action(s) - As listed overleaf.


Incident Response Visit due to Fire on the 2nd - 3rd of July 2015.

Site was visited due to a fire incident in Cell 9D(ii) on the 03/07/15.

A fire in a pile of frag waste type material had occurred on the evening of the 02/07 and into the morning of the 03/07. NRW officers and the Fire Rescue Service were in attendance to manage the fire and any fire water run-off generated. The fire is believed to have started spontaneously due to the stockpiled frag waste self-combusting; the fire was isolated to this material although it did affect the geotextile and geomembrane lining of the cell in this area, damaging an area on the eastern flank of the cell. The fire was brought under control and extinguished by the early hours of the 03/07 and any fire water generated was contained in the cell for treatment back through the on-site treatment plant. No off site impacts were noted as a result of the fire.

Recommendations / actions:

1. Future storage of Frag Waste type material should be reviewed to ensure there is no repeat of this type of incident.
2. Repair of the lining system in Cell 9D(ii) will require full CQA approval and validation as per the permit requirements.

	EPR Compliance Assessment Report	Report ID: BU7766IC/0249819
This form will report compliance with your permit as determined by an NRW officer		
Site	Bryn Posteg Landfill EPR/BU7766IC	Permit BU7766IC
Operator/ Permit	Sundorne Products (Llanidloes) Ltd	Date 22/06/2015

Section 3- Enforcement Response	Only one of the boxes below should be ticked
<p>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.</p>	
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.	<input type="checkbox"/>
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.	<input checked="" type="checkbox"/>
We will now consider what enforcement action is appropriate and notify you, referencing this form.	<input type="checkbox"/>

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
B1	C3	1. Newly installed gas wells on Phase 9D(i) should be connected to gas collection pipe work as soon as practicable 2. Leachate sump discharge on the Eastern flank of Cell 9C should be redirected to leachate collection infrastructure or a within waste soakaway constructed.	31/08/2015

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.