

Compliance Assessment Report

Report ID:
CAR_NRW0032994

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

Site	Bryn Posteg Landfill	Permit Ref	BU77661C		
Operator/Permit holder	Sundorne Products (Ilanidloes) Ltd				
Regime	Installations				
Date of assessment	06/03/2018	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	2.5.7				
Lead officer's name	McClymont, James				
Accompanied by					
Recipient's name/position	David Williams/ Technical Manager	Date issued	09/03/2018		

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
B1 - Infrastructure - Engineering for prevention and control of emissions	X	

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

Bryn Posteg Landfill Site, Installation of New Gas Well Infrastructure, Construction Quality Assurance (CQA) Validation Report (submitted 2nd March 2018)

Condition 2.5.7 in Permit EPR/BU7766IC, requires that the Operator shall submit a CQA Validation Report as soon as practicable following the construction of the relevant landfill infrastructure.

We have examined the CQA Validation Report for the installation of new gas well infrastructure at Bryn Posteg Landfill Site. The report provides details regarding three phases of works - Phase 1 which began on the 24th April 2017, Phase 2 which began on the 8th of September 2017 and Phase 3 which began on the 5th of December 2017.

We have a few questions regarding the report, which we would like some further information regarding. Please see below:

- Section 2.2 of the Plan requires that "all verticality checks will be recorded". Was the verticality of the boreholes checked? Where in the report is the verticality of the boreholes recorded?
- Section 3.2.1 of the Plan requires that the "CQA inspector shall record the approximate amount of stone installed to each well on his daily report sheets to allow for comparison to the theoretical amount". Why is this information not included on the daily report sheets?
- Section 3.1.2 of the Plan requires the "uncapped areas will have a bentonite seal of 3 metres depth, capped areas will have a bentonite seal 2 metres deep in accordance with the Industry Code of Practice". It is understood that all of the wells drilled in Phase 3 were in an uncapped area, and therefore should have received a bentonite seal 3m deep. The submitted drilling reports state that wells 120 - 125 all received a bentonite seal of only 2m, a third less than required. Could you please explain this apparent deviation from the CQA Plan?
- Well 124 did not achieve target depth of 21m due to wet waste/poor recovery, and was installed at 14m. Could you please explain why this well was installed at two-thirds its target depth?
- The CQA drilling report for well 124 indicates that this well was completed on 15/12/17, however, the drilling log supplied by the drilling sub-contractors indicates that this well was drilled on 18/12/17. Could you please confirm that CQA supervision was supplied for the entirety of this gas well installation?
- Section 4.0 of the Plan states that the wells will be connected to manifolds or direct/indirectly to the main carrier (180mm 17.6SDR to a 250mm 17.6 SDR) via 90mm 17.6 SDR pipework. Were the wells connected to manifolds or directly/indirectly to the main? What condensate management considerations were included? Were any leak or pressure tests undertaken as part of this scheme?
- Could you please provide an as built plan, showing the scheme in its entirety, including all wellhead references, connection pipework with pipe sizes (differing pipe sizes should be indicated by different line styles or colours)?
- Electro fusion welding records have been provided for the connection pipework used in Phase 1 and Phase 2, but the records for the connection pipework utilised in Phase 3 appear

to be absent. Could you please provide NRW with the electro fusion welding records for the connection pipework utilised in Phase 3?

Action 1: Please provide NRW with answers to all of the above questions by the 6th of April 2018.

It is understood that the wells drilled as part of Phase 3 were connected to the gas extraction system on the 1st and 2nd of February 2018, by SGG Environmental Services Ltd. This was over 40 days following the installation of the last well of this Phase. It is understood that for previous phases SGG have been on site to connect the wells during the drilling works / soon after the drilling works have been completed.

Leaving wells for this duration prior to connection to the gas extraction is not considered best practise, and may lead to point source and surface emissions of landfill gas. Such emissions were noted during our inspection on the 30th of January and scored in NRW_CAR0032922. It is best practise for gas wells to be connected to the gas extraction system as soon as possible following their installation in order to prevent fugitive landfill gas emissions.

EPR Compliance Assessment Report

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Operator/Permit holder	Sundorne Products (Ilanidloes) Ltd	Date	06/03/2018

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.

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			
B1	X	See comments section	06/04/2018

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.