

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

Site	Palleg Landfill Phase II EA/EPR/BT1908IX/V004			Permit Ref	BT1908IX		
Operator/ Permit holder	JLA Disposal Limited						
Date	19/06/2015			Time in	11:00	Out	13:00
What parts of the permit were assessed	see below						
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op		Water Discharge
Recipient's name/position	J ADAMS						
Officer's name	Gwyn Jones, Alan Price			Date issued		26/06/2015	

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	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	C4	2.1.1.
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	C4	1.5.1
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	A	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	A	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	C4	2.3.1
	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	A	
	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	3	Total compliance score (see section 5 for scoring scheme)	0.3
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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.

Site visit to Palleg Landfill site on Friday 19 June 2015.

Time 1100h to 1300h.

Purpose of unannounced visit

- (i) For Alan Price (NRW_GeoScience team) who is assessing the HRA submission to gain an appreciation of the site (inc, setting, size, scale together with on-site and off-site typography) and
- (ii) For Gwyn Jones to assess current waste inputs, operational condition and environment impacts.

Whilst approaching the site Gwyn Jones and Alan Price stopped at the gateway of the adjacent field that overlooks the active landfill.

A slight odour was detected whilst standing at the gateway.

GJ and AP then drove to site, after parking up and donning PPE, were greeted by 2 members of JLA staff.

After introductions and a brief discussion GJ and AP walked to the operational area of the site to view the activity.

Using the sole haul road GJ and AP walked around to the left and took an initial vantage point at the toe of the filled cell

ADVISORY Photo of uncovered waste was taken, timely capping of this area must be considered and undertaken.

GJ and AP continued around to view the recently engineered cell, it was noted that waste inputs into this cell had commenced.

ADVISORY Photo of waste in cell. An appropriate waste placement strategy should be used. NRW advocates that the tipping area should be kept as small as reasonable practicable.

SCORE 4 – as this landfill is defined as being non-hazardous then the tipped waste must benefit from adequate daily cover.

GJ and AP walked around the perimeter of this new cell as defined by the membrane and took photos at different locations.

GJ and AP stopped and evaluated the presence of a 6" tanker pipe believed to be at SW1.

As the compactor was not live then GJ and AP walked up the waste ramp onto the filled cell. Here AP took a panoramic view of the site.

Score 4 – Sheep (3 of) were seen roaming on the waste near the compactor – this is indicative of poor site security. Livestock must not be allowed to enter the permitted site area.

GJ and AP continued to traverse the waste cell and dropped down at the main haul road. GJ and AP then walked to the recently positioned leachate storage tank (green tank approximately 20,000L).

Near this leachate storage tank GJ and AP saw a 360 machine creating a track with inert material. GJ considered that this type of inert material could be used as cover material. Photo taken.

In order to gain a greater appreciation of the site setting en route back to the site office GJ and AP walked down to the lagoons.

On returning to the site office GJ and AP were met by JOHN ADAMS and undertook an informal discussion covering a multitude of topics (inc waste inputs, Powys CC CA site, WAMITAB, surface water management system etc)

Around 1300h GJ and AP signed the visitor sheet and left site.

Following the visit NRW e-mailed JA the following.

From: John Adams [jla@jlarecycling.com]
Sent: 25 June 2015 11:35
To: Ward, Tyrone; 'Lance Jones'; david@enviresource.co.uk
Cc: Jones, Gwyn (Cardiff); Hughes, Rhys; Drayton, Caroline; 'Arwel Jones'
Subject: RE: Palleg site inspection 19th June

Morning Ty,

We will start work on the re-profiling next week and the surface water system immediately after. The delay has been due to circumstances beyond my control which you are aware of.

With regard to daily cover I will ensure there is a stockpile of site won material kept on the active cell to use as cover.

Please be mindful when considering the allocation of breaches that the purpose of cover is to negate wind-blown litter and discourage vermin and birds neither of which are a problem on our site due to the type of material we are landfilling and the lack of putrescible waste.

Regards,
John

John Adams.
Director
JLA Disposal Ltd
01639 845839

From: Ward, Tyrone [mailto:Tyrone.Ward@cyfoethnaturiolcymru.gov.uk]
Sent: 25 June 2015 11:00
To: jla; Lance Jones; david@enviresource.co.uk
Cc: Jones, Gwyn (Cardiff); Hughes, Rhys; Drayton, Caroline; Arwel Jones
Subject: Palleg site inspection 19th June

Morning John,

We'll issue a CAR form for our inspection last week in due course; however in the interim there are two main points for consideration. It should be noted that these may also be addressed by your TCMs, in accordance with permit conditions.

1. We are disappointed in the lack of progress in Construction of the surface water management system; as there have been numerous delays in the project; and this summer has been relatively dry so far. You acknowledged NRW's continued patience on 21st May.

We understand that the design will now be for a pumped system (as opposed to gravity fed) and that the existing batters will be retained but will require re-assessment and re-profiling. During our inspection last week, you explained that a dumper was not available. This all needs pre-planning and we now expect to see some real progress in the next few weeks.

2. Daily cover was poor and has been highlighted on previous occasions.

Based on the observations made NRW are minded to allocate the site cat 4 breaches (2 of) upon the CAR form.

Regards Ty

T W Ward
Swyddog Rheoleiddio/Regulatory Officer
Cyfoeth Naturiol Cymru / Natural Resources Wales

	EPR Compliance Assessment Report	Report ID: BT1908IX/0242721	
This form will report compliance with your permit as determined by an NRW officer			
Site	Palleg Landfill Phase II EA/EPR/BT1908IX/V004	Permit	BT1908IX
Operator/ Permit	JLA Disposal Limited	Date	19/06/2015

Section 3- Enforcement Response		Only one of the boxes below should be ticked	
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.			X
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.			
We will now consider what enforcement action is appropriate and notify you, referencing this form.			

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			
B3	C4	Progress with surface water management system.	N/A
D1	C4	Remove and prevent ingress of sheep.	N/A
F3	C4	use of suitable cover on waste deposit.	N/A

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.