

Compliance Assessment Report

Report ID:
CAR_NRW0034354

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

Site	Nant Y Gwyddon Landfill		Permit Ref	PP3395FS		
Operator/Permit holder	Amgen Rhondda Ltd					
Regime	Waste Operations					
Date of assessment	19/11/2018	Time in	10:00	Out	12:30	
Assessment type	Site Inspection					
Parts of the permit assessed	Permit Condition 8, 15, 73					
Lead officer's name	Peppicelli, Claudia					
Accompanied by	Ward, Tyrone, Malatynski, James					
Recipient's name/position	Lee Foulkes/ Technical manager	Date issued	17/12/2018			

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
D1 - Incident Management - Site security	C4	Permit condition 8
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	C3	Permit condition 73

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	2	Total compliance score (see section 5 for scoring scheme)	4.1
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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

NANT-Y-GWYDDON LANDFILL SITE – Amgen Rhondda Ltd, (EAWML/ 30157, EPR/ PP3395FS) – 19/11/2018

Environment officer Claudia Peppicelli, James Malatynski and Ty Ward attended NANT-Y-GWYDDON LANDFILL SITE at Gelli (Rhondda Cynon Taff) on the 19/11/2018 and met with Technical Manager Lee Foulkes. The visit was undertaken as part of the "Closed landfill" project site inspection. Thank you for taking the time to attend the inspection and show us all the activities carried out on site. There were 2 minor breaches recorded during the inspection.

In the context of the Closed Landfill project this is a review of your compliance with the permit and the working plan regarding the management of the closure phase of the site and the monitoring plan.

Arrived on site we could immediately check the functionality of the of the gas power generator and flaring system that use the gas that is actively extracted from the landfill. The system provided measures of the quality and quantity of gas generated. At the time of our visit the system was recording a flow of 64 m³/hr composed on an average by 42% of CH₄, 19% of CO₂, 0.5% of O₂; corresponding to a potential 61 kW of power generation. The actual power put into the grid by the Capstone generator it's 55 kW.



Photo 1 showing Capstone microturbine

The inspection followed with a walk over the landfill where we could go to check the manifold valve control chamber for the gas capturing system. The valves are partially closed and opened depending on the gas flow in order to balance the field. Therefore, the maintenance team regularly checks on them. Since our previous visit, 5 new gas extraction wells have been installed.

Even though the day was particularly windy we randomly checked the gas wells that are 30-20 m deep drilled into the landfill. The impermeability to gas leak was verified with a Gazomat TDL gas-meter carried around on site. No gas was detected by the gas meter. The well's gasket made in bentonite provides a flex seal that needs to be kept with moisture to fully function as impermeable barrier. The wells inspected appeared in good condition with no major deformation to their structure (vertical direction) and no smell of gas was detected whilst on site.

Condition: G1, Monitoring of emissions & the environment

Permit condition 73 states that access to the boreholes shall be maintained during hours to prevent contamination of the sampling points.

The external perimeter of the landfill is provided with groundwater monitoring wells to collect samples. The regular monitoring occurring on site measures pH and conductivity while samples are taken to laboratory for the complete list of element records. We checked few of them: using a waters tube clear water was coming out of them; though one of the combined monitoring wells had a rubber bung displaced.

You have therefore score a cat 3 breach.

Action: Please ensure any missing gas bungs are replaced to seal the wells.

The leachate control system includes pipe work that collects the leachate flowing under hydraulic gradient in the depressed area at the margin of the landfill. The flow is measured around 1 litre/second which is a high value. This combined with the results from the leachate monitoring analysis brought to previous consensus that the leachate pumping system is draining leaching together with groundwater giving as a result a diluted leachate: high in flow and low in concentrations. The leachate is collected in a tank for settlement and control and then discharged in the DCWW sewage system for treatment. The tank appeared in good conditions and is regularly subjected to maintenance to test the structural integrity and clean the bottom from debris.



Photo 2 showing leachate collection riser

Condition: B3, Site Drainage (Clean and foul)

Permit condition 15 states that diversion and drainage of surface waters including the construction of a surface water drainage ditch shall be maintained as described in the WP.

During our inspection we could check the status of the surface water drainage system. We noticed some debris and vegetation in the channels.

Action: ADVISORY we recommend inspection and maintenance of drainage ditches to liberate from potential obstructions.

Condition D1: Security

Permit condition 8 states that the site boundary shall be fenced with stock proof fencing or equivalent of minimum height one metre as detailed in the WP.

The site is not far from residential areas and it's surrounded by grazing land for sheep. It is therefore subjected to occasional break-in. The damages to the external fence cause the possibility of animals to enter the property as we could notice during the inspection.

You have therefore score a cat 4 breach.

Action: we would recommend repairing it promptly as animals should not use the site to graze and this implies a security issue of the site.

If you have any queries relating to this form, please do not hesitate to contact me on the details below.

Claudia Peppicelli

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**In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body*

EPR Compliance Assessment Report

**Report ID:
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Site	Nant Y Gwyddon Landfill	Permit Ref	PP3395FS
Operator/Permit holder	Amgen Rhondda Ltd	Date	19/11/2018

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.

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			
D1	C4	we would recommend repairing it promptly	31/01/2019
G1	C3	Please ensure any missing gas bungs are replaced to seal the wells.	31/01/2019

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.