

Compliance Assessment Report

Report ID:
CAR_NRW0035647

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

Site	Hafod Quarry Landfill Site	Permit Ref	PP3139GB		
Operator/Permit holder	Enovert North Limited				
Regime	Installations				
Date of assessment	04/09/2019	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	2.5.4				
Lead officer's name	McClymont, James				
Accompanied by					
Recipient's name/position	Ian Craven/ Area Manager	Date issued	04/09/2019		

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

Hafod Quarry Landfill Site Cell 4 Eastern Upper Sidewall – CQA Validation Report, July 2019

We have reviewed the CQA Validation Report for Cell 4 Eastern Upper Sidewall at Hafod Landfill. The Validation Report has been submitted to NRW by CQA International acting on behalf of Enovert, the site operator. The report affirms that the works and the independent CQA monitoring carried out during construction are in accordance with the approved CQA Plan, submitted to NRW in April 2019.

We have examined the CQA Validation Report to confirm that the CQA monitoring works have been carried out as required, and this has required us to check that the test results have been reported accurately, that sufficient tests have been carried out, that the materials used are those approved and that the materials all meet the specification.

This Validation Report is one in a long line of Validation Reports for this site as the cells are being developed in sections. This report considers an extension of around 2000m² to the Eastern Sidewall and follows the previously used and accepted design. The materials used in the construction comprise non-woven filtration geotextile, drainage geocomposite and recompacted site won clay. The site won material has been previously characterised and has been used on all previous phases of construction. A trial pad has been constructed as part of the works to demonstrate the effectiveness of the combination of plant and number of passes to achieve the required degree of compaction.

The report is a little confused about the quantity of mineral liner used. Section 4.4 states that approximately 2000m² of drainage geocomposite was used to cover the area of the works. When calculated from the panel placement records this appears to be 1504m². The table in Section 5.1 indicates that 1550m² of liner was used as the basis for calculating the number of tests required. As the testing frequency for the mineral liner is specified per cubic metre it would have been most helpful if the table could have noted the volume of clay placed in the works. Our calculation leads us to conclude that around 3008m³ of clay has been placed.

The Table in Section 5.1 provides a summary of the number of tests required. The numbers are incorrect: Classification Testing should read 7, Compaction Testing should read 12, Permeability Testing should read 4 and Shear Strength Testing should read 12 and 4. However, we note that this number of tests has been carried out, so the report is compliant with the requirement of the CQA Plan and so a simple typo amendment to the Table will overcome this matter.

A similar error has been made in para 5 of Page 11 which states that the volume of clay is 1550m³ split between the two layers. We believe this should read 1550m³ for each of the two layers. This is also a typographical amendment.

We can confirm that the CQA Validation works have been carried out correctly, and that the correct parameters have been measured during construction at the correct frequency. Each of the test

result certificated is included within the report and they have been transcribed accurately into the body of the text. Accordingly, the CQA Validation Report is approved, however please see action 1 below.

Action 1: Operator to provide an updated version of the report considering our above comments, by 20.09.2019.

EPR Compliance Assessment Report

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Operator/Permit holder	Enovert North Limited	Date	04/09/2019

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 Action 1	20/09/2019

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.