

Carmarthenshire County Council  
Technical Services Department  
Street Scene Division  
Pibwrlwyd  
Carmarthenshire  
SA31 2NH

**Our ref: EPR/AP3991SM/S002  
Your ref: EPR/AP3991SM/S002**

**Date: 08/12/2015**

Dear Mr. Gray,

**Returning your permitting application**

**Application reference: EPR/AP3991SM/S002  
Operator: Carmarthenshire County Council  
Facility: Trostre Landfill Site, Llanelli**

We've looked at the extra information you sent us on 04<sup>th</sup> December 2015. We are still missing the information listed below. Unfortunately this means your application is not duly made and we must return it to you.

You may re-submit your application in the future. In order to aid you in submitting a future surrender application, I have listed the information we require in order for us to 'duly make' an application. Please note that this information is based on the application before me and is not exclusive. There may be further information requests following assessment of the information submitted at that time.

- Your response to the not duly made email (dated 30<sup>th</sup> November 2015) stated that you do not have records of the waste accepted on site throughout its operational life, is not acceptable. Permit condition 9 includes that 'a written record shall be kept of the characteristics and quantities of all wastes delivered to the facility...'. Also the modification of the permit on 26<sup>th</sup> March 1999 inserted a condition on record keeping of all wastes received and removed from the site. Therefore, records of the waste types accepted on site and deposited during the operation of the permit should exist. You must provide this as part of your surrender application. At the very least, your application should include information to characterise the waste deposited at the site with reference to its source(s), likely contaminants, and amounts.
- Our records indicate that the site has accepted potentially contaminated waste from Llanelli Gas Works. Furthermore, there has been landfill gas

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issues on site. The surrender report you have submitted also indicates that the Mercury and Selenium limits are above EQS on a number of occasions. You must ensure that you include adequate and appropriate supporting information in your surrender application to demonstrate how each of these issues were; caused, addressed and prevented from recurring.

- Your application must follow the standards set out in relevant guidance document for Landfill (EPR 5.02). You must refer to this when carrying out your assessment to surrender your environmental permit.
- Please note; as previously mentioned, our standard requirement when carrying out groundwater monitoring, is that you must have at least three boreholes (one up hydraulic gradient and two down gradient). The information supplied to date suggests that there is only one groundwater monitoring borehole point at the site. It is unlikely that you would be able to use data from one monitoring location to prove (in your application), that the site is fit for surrender. It is not clear how you have arrived at the conclusion with one borehole monitoring. You must investigate and provide us with evidence to support your claims that the upstream sources of the Mercury and Selenium reduces across the site, to do this you must provide sampling results showing the upstream and downstream sampling results.

We would be happy to work with you and provide further advice/guidance on the standards to be met. This will help you better understand the steps you need to take so that it's more likely any future surrender application can be confirmed as duly made. If you would like to talk to us about this, please contact your local compliance officer Lynda Warwick on 0300 065 3325.

We'll refund your fee separately.

If you have any questions please phone me on 0300 065 4513 or email [Mutluluk.williams@naturalresourceswales.gov.uk](mailto:Mutluluk.williams@naturalresourceswales.gov.uk).

Yours sincerely

**Mutluluk Williams**  
**Permitting Officer**