



**This form will report compliance with your permit as determined by an Environment Agency officer**

Site	Jameson Road Landfill - Phase 2 EPR/BL9518IE	Permit Ref	BL9518IE		
Operator/ Permit holder	TRANSWASTE RECYCLING AND AGGREGATES LIMITED				
Date	05/02/2024	Time in	13:15	Out	14:15
What parts of the permit were assessed	Operational area & recent waste deposits, landfill engineering & amenity matters				
Assessment	Site Inspection	EPR Activity:	Installation: X	Waste Op:	Water Discharge:
Recipient's name/position	Transwaste Recycling & Aggregates Limited				
Officer's name	[REDACTED]			Date issued	09/02/2024

**Section 1 - Compliance Assessment Summary**

This is based on the requirements of the permit under the Environmental Permitting Regulations (EPR). 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	C3	2.1.1; Table S1.1
b) Infrastructure	1. Engineering for prevention & control of pollution	C3	2.6.4
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	C2	1.1.1
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates & litter	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	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**  
**MSA, MSB, TCM = Management System condition A, Management System Condition B and Technically Competent Manager condition which are environmental permit conditions from Part 3 of schedule9 EPR (see notes in Section 5/6).**

<b>Number of breaches recorded</b>	3	<b>Total compliance score</b> (see section 5 for scoring scheme)	39
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.

This was an unannounced site inspection. The weather at the time of the inspection was dry and overcast with a strong wind from an approximate south-westerly direction.

The permit authorises a landfill for non-hazardous waste and landfill restoration.

The current permit conditions were issued as a variation on 17 August 2016.

The permit was transferred to the current operator, Transwaste Recycling & Aggregates Limited, on 30 August 2023. A Written Management System (also referred to as an Environmental Management System "EMS"), required through condition 1.1.1 of the environmental permit, was submitted to the Environment Agency on 05 April 2023 by the operator in support of the transfer application. It is titled 'Environmental Management System, Jameson Road Phase 2 Landfill Site, Transwaste Recycling & Aggregates Ltd'. The Status Log reference is V1 dated 04/04/2023.

An application to vary the permit was received by the Environment Agency on 21 December 2023. The Non-Technical Summary submitted with the variation application proposes the '*installation of a dedicated concrete tipping bay at the site to allow for tipping and reloading of suitable wastes when access to the operational area for road going, waste carrier vehicles becomes difficult – either due to wet weather conditions or technical limitations of the vehicles themselves*'. We have referred to variation application documents within this CAR form as they directly relate to some of the observations and current operations at the site.

A representative from the operator accompanied the Environment Agency officers during the inspection. A number of images were taken during the inspection and some are included and referenced within this report.

### **Site observations** –

#### **Issue 1**

##### ***Current landfilling methods & amenity matters***

*For clarity, mention to specific areas within this section will be made to by reference to drawing Jmr-REST-1123-02, which was submitted by the operator in the recent variation application.*

At the inspection, we observed that that the temporary capping at Cell 1, Cell 2 and Cell 5 had been removed, either in whole or in part, and waste tipping had recommenced on these areas. A significant quantity of stone / hardcore had been placed on the approach to Cell 2 and Cell 5 for use as a haul road. This haul road was not in use at the time of the visit, rather the operator was using three dumper trucks to carry waste from the tipping bay to the tip face, arriving from the south through unconstructed Cell 8 / Cell 9.

The size of the tipping face was significant and estimated at approximately 100m x 50m. There was no cover material observed across the tipping face and there was no obvious cover material off the tipping face which could be utilised.

It was very windy at the tipping face and litter was observed escaping from the area towards Cell 1 and the area of unconstructed Cell 6. Despite this, the dump trucks continued to transport waste from the tipping bay to deposit on the landfill.

Litter netting was in place running east to west along the northern boundary of the area marked temporary cap along Cell 1, albeit with one section missing. Two sections of litter netting were also observed running north to south along the western boundary of the area marked temporary cap along Cell 2. Checks on the restored areas of Cell 1 and Cell 2 confirmed that the litter netting was not preventing the escape of litter. Towards the end of the inspection, 3 employees arrived at Cell 1 to litter pick. A significant waste odour was also detected when stood downwind of the waste tipping area. Due to the south westerly wind direction, it was not possible to determine whether this odour could be detected outside of the permitted boundary.

A significant number of gulls and other birds were observed in the vicinity of the landfill tipping face – both in flight and on the waste.

It was confirmed by the operator's representative that works had recently started to construct Cell 6 and plant and machinery was observed in this area at the inspection.

Issues were noted with the wheelwash located on the site access road. The operator's representative stated this had been damaged by a vehicle when leaving site and was not currently operational. That said, the wheelwash was observed to be heavily silted and requires immediate action to empty and put back into operation. A road sweeper was operational on the site access road at the time of the inspection.

#### EMS –

Section 4.8 of the EMS refers to the 'Waste Emplacement Procedure' and Section 4.8.2 refers to the 'General Tipping of Waste'. This states that -

*'In the event of adverse weather conditions, the tipping operation shall cease if the risk to the environment from particulate matter, litter or odour is too severe'.*

***As referenced above, there was a strong wind noted at the tipping area during the inspection and litter was observed escaping towards the unconstructed Cell 6. Despite this, deposits of waste continued to take place.***

Section 4.8.3 of the EMS refers to 'Cover, Temporary and Final Capping.' This states that –  
*'The operational working area of the tipping face on the landfill is typically limited to an area of 15m x 15m. Cover is placed progressively over the surface of the working face and flanks during the working day.'*

***As referenced above, at the inspection the tipping face was estimated at approximately 100m x 50m and no cover materials or insufficient cover materials were observed on the tipping face and flanks.***

Section 4.12 of the EMS refers to 'Birds, Vermin and Insect Control' and Section 4.12.2 refers to the 'Control of birds and other scavengers'. These sections state –

*'4.12 The site is inspected each working day for the presence of significant numbers of vermin, flies and scavenging birds, and a record is made in the site diary and inspection log of the findings and any corrective actions undertaken.'*

*'4.12.2 Birds are attracted to landfill sites by areas of exposed wastes. The control of the size of the waste face, the immediate compaction of the waste on placement and the progressive placement of daily cover throughout the working day will minimise the attractiveness of the site to birds, and hence the risk of nuisance associated with the presence of significant numbers of birds...A full time falconer is employed at the site in order to discourage scavenging birds from feeding and loafing at the site. The falconer flies his birds of prey at regular intervals throughout the day, or as required.'*

***These bird control measures were not being undertaken at the time of the inspection. The***

**size of the waste face was not being controlled, cover was not or had not been applied and there was no falconer at the site at the inspection.**

Section 4.13 of the EMS refers to 'Litter Control'. Among the measures set out to prevent and / or minimise litter are –

'a) The installation is maintained in a tidy condition; any loose litter lying on the site or on fences is gathered and deposited at the working face each working day.

d) Covering of waste by the end of the working day with suitable cover material (typically inert material to a depth of 150 mm).

e) Operations are conducted wherever possible to ensure that landfilling proceeds in areas of the site at low level during the autumn and winter, when prevailing winds are stronger and more frequent.'

**These litter control measures were not being carried out at the time of the inspection and litter was seen across the site.**

Section 4.16 of the EMS refers to 'Odour Control' and states –

'The management and control of odour from the site is dealt with in more detail within the site's Odour Management Plan (OMP).'

Section 4.16.1.2 refers to 'Waste' odours and states –

'The risk of nuisance associated with odour generation directly from the waste is minimised by taking the following measures:

a) The immediate compaction of biodegradable waste following deposition, the progressive placement of appropriate cover material and the provision of an engineered cap. By the end of each working day all exposed faces are covered with a cover layer of nominal depth 150 mm, to minimise the risk of nuisance associated with odour.'

**These odour control measures were not being carried out at the time of the inspection and a waste odour was detected on-site downwind of the current operational landfilling activity.**

Images of the tipping area and the associated amenity issues can be seen at images 1 to 6 to this CAR form.

The current method of landfilling and the failure to appropriately cover waste is considered to be in **breach of condition 1.1.1** which states:

*"The operator shall manage and operate the activities:*

*(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints; and*

*(b) using sufficient competent persons and resources"*

**This non-compliance has been scored under sub criterion c2. Management system and operating procedures as a c2 breach - a non-compliance that could foreseeably result in a significant environmental impact.**

Various parts of the EMS are not being followed. We have applied the category 2 breach because the Environment Agency considers there to be a reasonably foreseeable likelihood of significant pollution from this waste operation. This pollution risk includes but is not limited to the risk of odour, litter, dust and leachate emissions while the waste is left uncovered over such a significant area.

Section 3 of your Permit provides several conditions where upon detection that the operation is giving rise to pollution the Environment Agency may request specific management plans be submitted for approval. At the current time we have assessed your operation against your overarching EMS and applied a category 2 breach relating to the risk of pollution. However, should during future site inspections we substantiate pollution we will request further control measures in

accordance with section 3 of the permit.

**Actions:**

- **Ensure that site operatives are trained and understand the requirements of 4.8.2 of your EMS. Ensure that records are maintained of checks made to monitor and record any 'adverse weather conditions' and actions taken following such detection;**
- **Please provide proposals to reduce the tipping area on site so it complies with your EMS. This action should be carried out in accordance with actions listed in the following section;**
- **Please provide proposals to ensure sufficient cover is placed on deposited waste. This action should be carried out in accordance with actions listed in the following section;**
- **Please provide proposals of how you intend to sufficiently control litter at your site. This should include timescales to extend and / or repair any damaged litter fencing;**
- **Please provide evidence that you have employed the services of a falconer at the site or an alternative method of bird deterrent;**
- **Please provide a copy of the current operational OMP.**

Please complete all of the above actions by 23 February 2024.

**Issue 2**

***Landfill engineering***

The images taken at the site inspection have been reviewed by the Geotechnical and Landfill Engineer Technical Specialist for Cumbria and Lancashire Area.

Comments and the follow-up actions required are set out below –

Some capped areas have been removed for the placement of waste. This includes the temporary capped slopes of Cell 1 and Cell 5 that border the proposed Cell 6 and on the top of the site which is permanently capped. The site was capped at the agreed settlement contours and whilst some settlement will have taken place, waste appears to be being deposited above the capped level.

Permit condition 2.7.6 states '*The total quantity of waste that shall be deposited in the landfill shall be limited by the pre-settlement levels shown on drawing JmrP2-PPCB-1209-09 A3*'.

**ACTION: Please provide a current survey, with a comparison to the pre-settlement levels on drawing JmrP2-PPCB-1209-09 A3 & calculation of available void space, to demonstrate that current tipping is compliant with condition 2.7.6 (\*)**

**ACTION: Please provide a plan to show the areas of capping that have been removed and clarify whether this is temporary capping only or whether any permanent capping has been removed.**

Image 7: The new waste appears to be being tipped directly onto the regulating layer that was below the capping. There is concern that the compacted regulating layer could form a barrier to percolating leachate and could create a plane for runoff and potential instability.

**ACTION: Please confirm whether new waste deposits have been tipped directly onto the regulating layer that was below the capping.**

Image 8: There is a steep waste face above the proposed Cell 6 and this raises concerns over the stability and size of this area. There is the potential for waste and leachate to leave the contained area.

Image 8 & 9: These photos show that waste bales have rolled down from the tipping face and are now in the unlined area along with general waste that has left the cell. Below the new waste is also an area of what looks like instability in the corner of Cell 1 and Cell 5 below the steep waste face. Here, runnels indicate that runoff may have left the site. Water runoff from the cell must be contained within the cell.

**ACTION: Provide details on the surface water management plan for the current operational landfill area.**

**ACTION: Clarify where the surface water shown in Image 8 that is in the proposed Cell 6 is being pumped to.**

Images 7, 8, 9 & 10: The face of Cell 1 where the temporary cap has been removed and additional material has been deposited along the exposed section above the cell bund and that some waste/soils have spilled over and left the contained area – Image 8. It also appears to have been tipped over the temporary cap that has not been removed as shown in Image 8.

The gradients of the temporary cap were stability assessed. Any change to these slopes must be assessed and a Stability Risk Assessment submitted for agreement.

**ACTION: Please provide further information on this matter.**

Any cut off ditches should be kept clear of litter and to fall to a sump that will take any runoff back into the cell.

Images 8 & 11: The edge of Cell 5 basal liner is visible and the geotextile appears damaged. This bund is the limit of containment and no waste is permitted to leave this area.

**ACTION: The engineered liner on the bund must be inspected for damage and repaired under CQA in accordance with the agreed CQ documents. The bund must be clearly marked and protected from damage and not form part of the run-off collection (\*).**

Image 12 also shows a run off channel through the newly deposited material and evidence of instability

Image 13 shows the edge of the permanent cap where there are waste bales and waste deposited right up to the edge and overlapping the edge of the cap. There is also evidence of vehicles rutting in the soils. There are no measures to separate the cap from the waste and there is the potential for contaminated runoff onto the capped area. This area has 0.6m soils and is not designed for vehicle access without additional assessment and protection.

**ACTION - Confirmation is required that the geomembrane and geotextile has been removed from under the placed waste as this is not clear.**

Images 14 & 20: Infrastructure has been constructed including site roads and tipping bay on top of the permanent capped areas with no consultation or engineering assessments submitted for the impact on the capping or basal liner.

Image 15 shows the new road into the site where it appears that waste has been used to construct the road and that it extends beyond the contained area.

Image 16 shows what looks like removed gas pipework to the left of the track and Image 27 shows gas infrastructure damage and bending of the well. Images 28 & 29 show disconnected pipework.

**ACTION: Provide details on the infrastructure that has been disconnected and how gas extraction is being managed to across the capped areas and areas of waste deposited.**

Image 18: The gas pipeline has been raised up, however, there are dips in the line

**ACTION – Clarify how condensate is being managed.**

Image 17 – there appears to be a 'top hat' from a gas well in the pulled back geomembrane to the left of the photo. What has happened to the associated gas well?

**ACTION: Clarify where are the gas wells in the area now being tipped with waste?**

**ACTION: An evaluation of the gas infrastructure is required and assessment on whether it is adequate for the current activities (\*).**

Image 19 looks like Cell 6 is being excavated.

**ACTION: Clarify where is the excavated material being stockpiled.**

Other than those actions marked (\*), please complete all the above actions in this section in full by 23 February 2024.

For those actions marked (\*), you are required to provide the Environment Agency with proposed timescales by which time these actions will be completed. The proposed timescales for completion should also be provided to the Environment Agency by 23 February 2024.

The Environment Agency intend to review all representations made with respect to landfill engineering and provide further compliance assessment records.

As identified above, waste has escaped from contained areas into the unlined Cell 6 area due to poor waste management and the steep, potentially unstable waste face. This is considered to be in **breach of condition 2.6.4** of the environmental permit, which states:

*"No disposal of waste shall take place in a new cell until the operator has submitted a CQA Validation Report and the Environment Agency has confirmed it is satisfied with the CQA Validation Report."*

***This non-compliance has been scored under sub criterion b1. Infrastructure - Engineering for prevention and control of pollution as a c3 breach - a non-compliance that could foreseeably result in a minor environmental impact.***

**ACTION: Immediately remove this waste back into the cell and implement measures to prevent re-occurrence by removing the steep waste face above Cell 6.**

### **Issue 3**

#### ***Waste tipping bay –***

Observations at the inspection confirmed that that the tipping bay is already operational at the location identified on the current variation application – this is despite the variation application referred to previously not yet having been determined.

On review of the variation application, the proposal looks to include a D15 activity as an additional Directly Associated Activity (DAA) within Table S1.1. The Non-Technical Summary (NTS), submitted with the variation, then sets out control measures that would aim to prevent and / or minimise the potential for litter and odour from the use of the tipping bay. These include -

- only wastes that are deemed suitable after the waste assessment and characterisation process (i.e. wastes with a low potential risk for odour and/or litter nuisance) shall be accepted for unloading within the tipping bay;
- all wastes deposited within the bay shall be immediately reloaded onto site vehicles and transported to the tipping area for emplacement.
- in the event of suitably windy conditions, tipping within the bay will be ceased;
- the tipping bay will be surrounded on all sides by a dedicated netting system so as to prevent and/or minimise the potential for litter migration away from the area during loading and unloading activities.

At the time of the inspection, it was evident that none of these control measures were being implemented. Waste was being stored above the height of the lego-block construction, litter was observed across the adjacent restored cells of the landfill (Cells R10A and Cell 7) and a significant number of gulls were observed flying in the vicinity of the tipping bay and landed on the waste.

The activities taking place in the tipping bay are considered to be in **breach of condition 2.1.1 and Table S1.1** which state:

Condition 2.1.1 –

*'The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").'*

Table S1.1 limits activities to A1 – landfill for non-hazardous waste and landfill restoration and A2 – Discharges of site drainage from the landfill.

The operation of the tipping bay is not currently authorised by the environmental permit and should not be operational until the permit variation application has been determined.

***This non-compliance has been scored under sub criterion a1. Permitted activities – specified by permit as a c3 breach - a non-compliance that could foreseeably result in a minor environmental impact.***

It should be noted that this score is based solely on the activity not being authorised under the current permit conditions. It does not take into consideration the impact that the construction may have had on the engineered capping at this location. If it is later demonstrated that this activity and / or construction has compromised the capping, then the non-compliance score may be reconsidered and amended.

Images of the tipping bay and the associated litter and gull presence can be seen at images 20 to 26.



**Photograph 1**

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**Photograph 2**

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**Photograph 3**

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**Photograph 4**

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**Photograph 5**

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**Photograph 6**

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**Photograph 7**

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**Photograph 8**

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**Photograph 9**

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**Photograph 10**

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**Photograph 11**

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**Photograph 12**

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**Photograph 13**

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**Photograph 14**

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**Photograph 15**

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**Photograph 16**

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**Photograph 17**

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**Photograph 18**

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**Photograph 19**

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**Photograph 20**

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**Photograph 21**

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**Photograph 22**

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**Photograph 23**

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**Photograph 24**

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**Photograph 25**

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**Photograph 26**

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**Photograph 27**

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**Photograph 28**

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**Photograph 29**

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**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.

*\*Non-compliance with MSA, MSB & TCM do not constitute an offence but can result in the service of a compliance, suspension and/or revocation notice.*

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.

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.

X

**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			
A1	C3	Actions set out in Section 2 of the CAR form	N/A
B1	C3	Actions set out in Section 2 of the CAR form	16/02/2024
C2	C2	Actions set out in Section 2 of the CAR form	23/02/2024



## 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.
- A civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response for this/these offence(s).

**See our Enforcement and Civil Sanctions guidance for further information**

*\*A breach of permit condition **MSA, MSB & TCM** is not an offence but may result in the service of a notice requiring compliance and/or suspension or revocation of the permit.*

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 <b>major</b> environmental effect	60
C2	A non-compliance which could have a <b>significant</b> environmental effect	31
C3	A non-compliance which could have a <b>minor</b> environmental effect	4
C4	A non-compliance which has <b>no</b> 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.

**MSA, MSB & TCM are conditions inserted into certain permits by Schedule 9 Part 3 EPR**

**MSA** requires operators to manage and operate in accordance with a written management system that identifies and minimises risks of pollution.

**MSB** requires that the management system must be reviewed, kept up-to-date and a written record kept of this.

**TCM** requires the submission of technical competence information.

## Section 6 – General Information

### Data protection notice

The information on this form will be processed by the Environment Agency to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The Environment Agency 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 Environment Agency 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 Environment Agency 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 28 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?

A permit holder can challenge any part of the CAR form by writing to the Environment Agency office local to the site within 28 days of receipt. If the issue cannot be resolved by the local office, a permit holder may request an appeal of the regulatory decision by emailing [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk) within 14 days of receipt of the outcome.

If you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the Parliamentary and Health Service Ombudsman phone their helpline on 0345 015 4033.