Environment Agency
Agency

# **EPR Compliance Assessment Report**

Report ID: UP3431VF/0310053

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This form will report compliance with your permit as determined by an Environment Agency officer							
Site	Preston New Road Exploration Site EPR/AB3101MW			Permit Ref	UP3431VF		
Operator/ Permit holder	Cuadrilla Bowland Limited						
Date	04/07/2018			Time in	10:00	Out	13:00
What parts of the permit were assessed	Permitted Activities - Drilling, Mining waste facility						
Assessment	Site Inspection	EPR Activity:	Installation X	Waste Op	Water Discharge		
Recipient's name/position	HSE&P Manager						
Officer's name	Environment Agency Officers			Date issued	09/07/2018		

# **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 Complian	Condition(s) breached		
a) Permitted activities	1. Specified by permit	Α	
b) Infrastructure	1. Engineering for prevention & control of pollution	Α	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	Α	
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	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	<b>1.</b> Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	Α	
	2. Noise	Α	
	3. Dust/fibres/particulates & litter	Α	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance	1. Monitoring of emissions & environment	Α	
and reporting	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	Efficient use of raw materials	N	
	2. Energy	N	
	category (* suspended scores are marked with an mpliance), <b>N</b> = Not assessed, <b>NA</b> = Not Applicate		

Number of breaches recorded

O

Total compliance score (see section 5 for scoring scheme)

If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

CAR 2 V2.0 Page 1 of 4

# 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 site inspection provided a training opportunity for an additional EPR inspector and a familiarisation visit for our seismic specialist.

Drilling of well PNR2 had ceased having reached the total depth required. Casing of the well will now commence to complete installation of the well. Once this work finishes installation of the geophones will be undertaken. We intend to conduct a site inspection with our seismic specialist to observe the installation of the geophones.

On 1 June 2018 a drawing (Ref: PNR-ENG-DRW-002 Rev 5 Flare Location) showing the location of each of the two flares was received in line with pre-operational condition 9 (PO9, Table S1.3). We can confirm that the document submitted is appropriate to meet the requirements of PO9.

Submission and approval of PO10 is required prior to using the flares, which requires a written operational and control procedure for the incineration of natural gas (Schedule 1, Activity A1, Table S1.1). A draft copy of PO10 was presented to us during the inspection but not removed from site. We shall formally review the final draft when submitted.

Inspection of the flares and associated equipment in situ was undertaken.

Inspection of the hazardous mining waste facility referenced as A3 in Table S1.1 of the environmental permit. Drill cuttings, water based drilling muds storage in enclosed containers observed, no spillages or loss of containment detected.

Inspection of the methane analyser, hydrogen sulphide (H<sub>2</sub>S) monitor and weather station on site boundary.

Noticeable but localised oily odours detected on site around oil based drilling mud storage only. Odour was not detected beyond the boundary of the site.

At 21:07 on 29 June 2018 an odour complaint was received from a member of the public reporting a strong smell of  $H_2S$  gas in the area. The operator was informed and asked to investigate. No alarms had been received or triggered and no odour was found to be coming from the site. The complaint investigation was followed up during this inspection, no  $H_2S$  was picked up by monitoring instruments on and around the time of the complaint.

At 00:12 on 5 July 2018 an odour complaint was received from a member of the public, noticed at 22:05 on 4 July 2018. The report referenced a smell of rotten eggs rated 4 out of 6. The operator was informed prompting an investigation. We understand that no noticeable H<sub>2</sub>S odour was detected at the time of the complaint. H<sub>2</sub>S data collected at the time of the complaint recorded zero on the drilling rig. No H<sub>2</sub>S odour was noticed at the time of this inspection.

At 15:27 on 5 July 2018 a complaint of odour described as acid and chemicals was reported by a member of the public, rating it a 4 out of 6. Vibrations were also noted. The operator was informed immediately of the complaint which prompted an investigation. No odour of acid or chemicals were detected on site during the reported period and no vibrations were felt at the site. There were no new operations at the site likely to cause vibrations and none were detected during the site inspection.

Routine groundwater sampling from borehole 1 (BH1) was observed.

No non compliances observed during this site inspection.

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	EPR/AB3101MW			
Operator/ Permit	Cuadrilla Bowland Limited	Date	04/07/2018	

Section 3- Enforcement Response	Only one of the boxes below should be ticked			
You must take immediate action to rectify any non-compliance Non-compliance with your permit conditions constitutes an offer revocation of a permit. Please read the detailed assessment in	nce and can result in criminal prosecutions and/or suspension or	or		
Other than the provision of advice and guidance, at present we of the non-compliance identified above. This does not preclude information comes to light or advice isn't followed.				
In respect of the above non-compliance you have been issued enforcement action. This does not preclude us from taking additionable 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.			
	CCS Category	Action Required / Advised	Due Date	
	on 1 above			

CAR 2 V2.0 Page 3 of 4

# 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

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.

#### 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?

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 03708 506 506 (Mon to Fri 08.00–18.00) and ask for the Customer Contact team or send an email to enquiries@environment-agency.gov.uk. 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.

CAR 2 V2.0 Page 4 of 4