



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

Site	CUADRILLA BOWLAND LIMITED	Site Ref	W610
Operator	CUADRILLA BOWLAND LIMITED	Permit Ref	KB3395DE
Date of assessment	9 April 2019	National Security Direction	NO
What parts of the permit were assessed	All conditions		
Assessment	Site Inspection	Activity:	Radioactive Substances Activity
Recipient's name/position	--		
Officer's name	RSR Regulatory Officer	Date issued & delivery method	11 April 2019 Posted

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 Compliance Summary			Condition(s) breached
a) Permitted activities	1. Specified by permit	A	--
b) Infrastructure	1. Engineering for prevention & control of pollution	A	--
	2. Closure & decommissioning	A	
	3. Site drainage engineering (clean & foul)	NA	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	A	--
	2. Management system & operating procedures	A	
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	A	--
	2. Accident, emergency & incident planning	A	
e) Emissions	1. Air	NA	--
	2. Land & Groundwater	NA	
	3. Surface water	NA	
	4. Sewer	A	
	5. Waste	A	
f) Amenity	1 to 5	N/A	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A	--
	2. Records of activity, site diary, journal & events	A	
	3. Maintenance records	A	
	4. Reporting & notification	A	
h) Resource efficiency	1. Efficient use of raw materials	N	--
	2. Energy	N/A	

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

Number of breaches recorded	0
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If the number of 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, storage, 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 exemption conditions
- details of any multiple non-compliances
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice
- a reference to photos taken

This was a planned inspection to look at the management of radioactive waste water.

There is currently no radioactive waste water stored on site as all the radioactive waste from the recent hydraulic fracturing campaign has been taken off-site for disposal.

You were able to show records of each movement of the radioactive waste off-site and confirmation of its disposal at a site permitted to accept radioactive waste water. You were also able to show and explain your detailed tracking of all these transfers. The Agency is satisfied that this waste is being managed in accordance with the conditions of this permit.

We reviewed the external laboratory results for the samples taken from each transfer of radioactive waste. The results show a reasonable correlation with the timeline of the hydraulic fracturing, in that as the ratio of formation water in the flowback increases so too does the measured radioactivity. The highest results were safely below the permit limits.

The Environment Agency is satisfied that the activity of the radioactive waste water is within the limits contained within this permit.

The sampling method was discussed and you were able to show that no contamination was found around discharge points, sampling areas and on sampling equipment.

We also discussed the current sampling methodology with two points being noted. One the safe access to some of the tanks for sampling and two the time to take samples should a subsequent hydraulic fracturing campaign generate larger volumes of flowback. We discussed that the way in which the flowback is managed within the tanks could be altered so as to negate the need to sample the tanks with more difficult access. Secondly we also discussed that a trial could be run to compare a single sample with the current composite sample. If this shows that the results are similar then you could propose a revised sampling methodology for consideration.

We also walked around the site including looking at the storage tanks where radioactive waste water was stored.

No compliance matters were observed with these storage tanks with respect to this permit.

Supplementary Note (This is not part of the Compliance Assessment)

Oil and Gas production may bring low levels of naturally occurring radioactive materials, NORM, to the surface within produced waters. Where the level of NORM is above the limits specified in the Environmental Permitting Regulations a permit to accumulate and dispose of radioactive waste is required. Further information can be found in our sector guidance pages at <https://www.gov.uk/guidance/onshore-oil-and-gas-sector-guidance>.



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.

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.

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			

CCS record number

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.

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 categories

CCS category	Description
C1	A non-compliance which could have a major environmental effect
C2	A non-compliance which could have a significant environmental effect
C3	A non-compliance which could have a minor environmental effect
C4	A non-compliance which has no potential environmental effect

Operational Risk Appraisal (Opra) – Non-compliances do not currently affect RSR Opra scores.

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), subject to any national security requirements. 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 twenty 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 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 (www.ombudsman.org.uk) phone their helpline on 0345 015 4033.