



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	12/09/2019		Time in	09:15	Out	13:15
What parts of the permit were assessed	Operating Techniques - Environmental Management and Monitoring Plan					
Assessment	Audit	EPR Activity:	Installation	X	Waste Op	Water Discharge
Recipient's name/position	Planning, Permitting and Environmental Manager					
Officer's name	EA Officers		Date issued	08/11/2019		

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

Permit Condition	Compliance	Condition(s) breached
a) Permitted activities	1. Specified by permit	A
b) Infrastructure	1. Engineering for prevention & control of pollution	N
	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	A
	2. Management system & operating procedures	A
	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	1. Air	A
	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	C4
	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

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

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	0.1
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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 audit was undertaken to assess compliance of Cuadrilla's ambient air monitoring programme against the requirements set out in their Environmental Management and Monitoring Plan (Pre-operational condition PO2).

There was one non-compliance with permit conditions identified during this audit:

- The deployment protocol for targeted methane monitoring in the EMMP was not followed. Cuadrilla did not inform the EA of deployment and the data was not reviewed for abnormal results within 48 hours of the end of the monitoring period.

The data has since been downloaded and there were no abnormal results. This non-compliance is classed as Category 4; no impact on human health, quality of life or the environment.

Site Walkover

A site walkover was undertaken, initially inspecting the continuous monitoring equipment on the site boundary. The continuous monitoring equipment measures methane, particulates (PM10), nitrogen dioxide and total volatile organic compounds.

All equipment was calibrated and maintenance checks were being performed on the instruments at least on a monthly basis. These checks include checking sample lines for blockages, filters, electrical checks, signal telemetry, operating temperature and software checks. All maintenance is recorded.

The operator is proposing to change the particulate monitor (Osiris Airborne Particle Monitor) due to compatibility issues with the onsite data display and is currently carrying out parallel monitoring with a different MCERTS analyser (TSI DusTrak 8543-M). The DusTrak has a lower uncertainty of measurement (30.9%) relative to the Osiris monitor (46.2%). We deem this change to be acceptable, given that the new instrument has a lower measurement uncertainty.

The nitrogen dioxide monitor has been replaced with a like-for-like monitor due to a sensor fault on the previous instrument.

We inspected two of the off-site air monitoring locations to the South-East and North-East of the site; Stations 1 and 2. The equipment includes diffusion tubes for measuring hydrogen sulphide and BTEX in line with the waste management plan. Diffusion tubes are changed (and analysed) monthly and both sites appeared to be well maintained.

Methane Monitoring

There are two continuous methane monitors detailed in the EMMP, one permanently located on the site boundary and one that can be moved to target certain activities on site. This targeted monitor was deployed between 29 August and 6 September. According to the deployment protocol in the EMMP, the operator must notify the EA between 10 working days and 24 hours before deployment. Notification was not provided of this deployment. Also, the EMMP requires that the operator notifies the regulator within 48 hours of the end of the monitoring period of any abnormal monitoring. The

operator was not able to download and extract data within this period as there were issues encountered with the mobile network. However the operator has since downloaded the data and there were no abnormal readings (maximum methane concentration 3.5ppm).

Open Top Tanks

The open-top tanks are permitted for use during specific flowback activities where there is a very low risk of methane being released. The open-top tanks were used from 27-30 July during well circulation. We viewed the methane monitoring records taken and the maintenance checks carried out on the methane analyser and we noted no issues.

Data Handling

Data from the continuous monitors (apart from the targeted methane monitor) is streamed to a display in the on-site office facilities so that it can be checked for elevated readings. This display shows the live results graphed on a display alongside the threshold values for notifying the EA.


Quality Control (QC) of data

Operational procedures have been produced that detail the parameters to be measured, at what frequency and the staff’s responsibilities for QC. Monitoring data is QC’d by a dedicated member of staff and discussed monthly with the Environment & Planning Manager before reports are issued to the EA. Monitoring reports are produced fortnightly or by notification in response to an exceedance of a trigger value. We have inspected the reports and we are satisfied that they contain the appropriate information.

Notifications

In accordance with the EMMP, the operator has provided notifications to the EA when levels of methane, nitrogen dioxide or PM10 have exceeded the notification/reporting thresholds in the EMMP. The notification/reporting thresholds are set to give a very early indication whether levels of these substances may be above baseline levels at the site boundary. They are based on 10-minutely averaged data unlike the Air Quality Objectives (the environmental standards for air) which are over 1hr, 24hr and annual. The notifications do not tell us whether the Air Quality Objectives for these substances have been exceeded at the site boundary, but the collected data is assessed against these objectives too.

Since the beginning of 2019 we have received 23 notifications for nitrogen dioxide, 26 notifications for PM10, 4 notifications for methane and 0 notifications for benzene. The notification reports include an explanation from Cuadrilla as to the potential source, either from operations onsite or from other sources offsite. None of these levels have contributed to an exceedance of the Air Quality Objectives at the site boundary.

 Environment Agency	EPR Compliance Assessment Report	Report ID: UP3431VF/0342132	
This form will report compliance with your permit as determined by an Environment Agency officer			
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Operator/ Permit	Cuadrilla Bowland Limited	Date	12/09/2019

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.	X
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			
G1	C4	Advised to follow protocol for targeted methane monitor deployment and download as detailed in EMMP	N/A

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 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 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.