



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	06/03/2019		Time in	09:45	Out	13:30
What parts of the permit were assessed	Flowback Management, Storage and Disposal					
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	23/04/2019		

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

		Condition(s) breached
a) Permitted activities	1. Specified by permit	N
b) Infrastructure	1. Engineering for prevention & control of pollution	A
	2. Closure & decommissioning	NA
	3. Site drainage engineering (clean & foul)	N
	4. Containment of stored materials	A
	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	A
d) Incident management	1. Site security	N
	2. Accident, emergency & incident planning	N
e) Emissions	1. Air	N
	2. Land & Groundwater	N
	3. Surface water	N
	4. Sewer	N
	5. Waste	A
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

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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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.

An audit was carried out on waste flowback management, storage and disposal to check compliance with permit conditions and the Waste Management Plan. A separate inspection was undertaken in relation to Radioactive Substances (permit EPR-KB3395DE) on the 9 April 2019. This audit report should be read alongside the Radioactive Substances Inspection report (refl/190409/KB3395DE).

No non-compliances were found during the audit.

Monitoring and Sampling

Flowback water was stored on site before reuse or disposal in 23 tanks, each with 70m³ capacity. This was well below the capacity set in the permit of 3000m³.

Monitoring of flowback is undertaken regularly by a contractor for a wide range of parameters. The operator checks the contractor's competency through CVs and these were available for all contractors. A Cuadrilla staff member has also undertaken appropriate training.

Thickness test and hydro-test records were checked for all 23 flowback tanks prior to hydraulic fracturing. All tanks had a thickness greater than 6mm and the hydro-tests found no leaks.

Daily level checks were done on the flowback tanks and the results recorded in the site office clearly showing the tank configuration and quantity of water in them.

All flowback fluid went through UV treatment before being reused.

Records of the volume of flowback waste were checked, along with consignment number, waste stream, EWC code, tanker number, vehicle registration, carrier and disposal point. Waste was removed from site Monday to Friday.

The first waste flowback sample for compositional analysis was taken on 18 December 2018. Earlier samples were taken of the recirculated/reused flowback for compositional analysis.

Samples were taken at the top, middle and bottom of the tanks and mixed to form a composite sample. Samples were taken to a UKAS accredited laboratory for chemical analysis. The UKAS certificate was seen during the audit. The operator no longer requires to analyse all of the indicative flowback determinands in the Waste Management Plan as the receiving waste treatment site does not require all of this information to accept and treat the waste.

The volume of sand generated in the flowback fluid was recorded every hour and was checked for naturally occurring radioactive materials by the operator. No sand has been disposed of to date.

Flowback water had been through the separator to remove gas before it entered the flowback tanks, however the top of the flowback tanks were monitored using a portable gas analyser.

Removal and Transport


The first waste flowback was taken off site by three tankers on 19 December 2018. Prior to that flowback water was reused until hydraulic fracturing operations were finished.

A vacuum tanker was used to pump the waste flowback water out of the flowback tanks. All flowback was appropriately classed as EWC 01 01 02 and compositional analysis was undertaken on every tank for classification from 18 December 2018 to 14 January 2019.

Duty of care documents for a selection of loads were reviewed in detail. All information was found to be correct.

The operator has also carried out checks on the waste carriers including checking their carrier's licences. A performance review had been undertaken on the main flowback waste carrier which was viewed on site. A Driver Checklist is completed before each tanker driver leaves the site to ensure there are no leaks, pipes are stowed correctly, the vehicle is in a good condition and the paperwork is completed properly. Records of these checks were seen during the audit.

All hoses were new prior to waste flowback being produced. The hoses were hydro-tested in February and March 2019 to 150psi. All hoses passed. Daily site walkovers during the operations were undertaken and any leaks or spills would have been noted during these checks.

 Environment Agency	EPR Compliance Assessment Report	Report ID: UP3431VF/0330896	
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Operator/ Permit	Cuadrilla Bowland Limited	Date	06/03/2019

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.			
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			

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.