

# SITE CONDITION REPORT TEMPLATE

For full details, see H5 SCR *guide for applicants* v2.0 4 August 2008

**COMPLETE SECTIONS 1-3 AND SUBMIT WITH APPLICATION**

*SUBMITTED FOR EP APPLICATION IN JULY 2015 (BASELINE REPORT SUBMITTED UNDER RFI), RESULTING IN EPR/HP3638WW BEING GRANTED ON 15/09/2015.*

**DURING THE LIFE OF THE PERMIT: MAINTAIN SECTIONS 4-7**

*SUBMITTED FOR EP VARIATION APPLICATION EPR/HP3638WW/V005 IN JANUARY 2023, IN RESPONSE TO THE NON-DULY MADE NOTICE DATED 21/12/2022.*

**AT SURRENDER: ADD NEW DOC REFERENCE IN 1.0; COMPLETE SECTIONS 8-10; & SUBMIT WITH YOUR SURRENDER APPLICATION.**

*NOT YET APPLICABLE*

<b>1.0 SITE DETAILS</b>	
Name of the applicant	O.C.O Technology Limited
Activity address	Avonmouth Aggregate Production Facility Off Central Avenue Hallen Avonmouth BS10 7SD
National grid reference	ST 53828 83207

Document reference and dates for Site Condition Report at permit application and surrender	<p>Baseline Report – submitted under RFI in 2015 for the purposes of obtaining the original EP (HP3638WW). Report ref. TEC Ltd, 120412.007.01 “Surrender Site Condition Report”</p> <p>Also provided is report TEC Ltd, 120412.006.01 “Remediation Strategy and Verification Plan”. Both dated February 2015</p> <p>Also provided is “Unit 1 Severn View Industrial Park, Hallen – Preliminary Geo-Environmental Assessment, prepared by TEC for Churngold Recycling Ltd, dated December 2014, ref. 120412.005.01A.</p>
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Document references for site plans (including location and boundaries)	<p>“Unit 1 Severn View Industrial Park, Hallen – Preliminary Geo-Environmental Assessment, prepared by TEC for Churngold Recycling Ltd, dated December 2014, ref. 120412.005.01A.</p> <p>Copy provided in the 2015 permit application.</p>
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**Note:**

In Part A of the application form you must give us details of the site’s location and provide us with a site plan. We need a detailed site plan (or plans) showing:

- Site location, the area covered by the site condition report, and the location and nature of the activities and/or waste facilities on the site.
- Locations of receptors, sources of emissions/releases, and monitoring points.
- Site drainage.
- Site surfacing.

If this information is not shown on the site plan required by Part A of the application form then you should submit the additional plan or plans with this site condition report.

## 2.0 Condition of the land at permit issue

<p>Environmental setting including:</p> <ul style="list-style-type: none"> <li>• geology</li> <li>• hydrogeology</li> <li>• surface waters</li> </ul>	<p>See Section 5 of TEC report ref. 1204012.005.01A for detailed information.</p> <p>The site is reported to be underlain by superficial Tidal Flat Deposits comprising firm to stiff clay greater than 1 m thickness overlying very soft to soft silt and clay with some discontinuous peat/organic material and sand/gravel lenses to a depth of approximately 10 mbgl followed by clayey sand/gravel. Mercia Mudstone encountered within the site area was recorded from a depth of approximately 14 mbgl and comprised moderately weak to moderately strong dark red mudstone. The superficial Tidal Flat Deposits are classified by the Environment Agency as Unproductive Strata and the underlying Mercia Mudstone Group as a Secondary B Aquifer of low productivity.</p> <p>The site is considered to be of Low to Moderate environmental sensitivity due primarily to the proximity of a surface water course (Rhine/Drain adjacent to the western and northern site boundaries) and the Avon Estuary Special Area of Conservation. IT must be noted that the environmental setting attributed to this site should be taken in context with the similar geo-environmental setting of adjacent and surrounding areas.</p>
<p>Pollution history including:</p> <ul style="list-style-type: none"> <li>• pollution incidents that may have affected land</li> <li>• historical land-uses and associated contaminants</li> <li>• any visual/olfactory evidence of existing contamination</li> <li>• evidence of damage to pollution prevention measures</li> </ul>	<p>See Section 2.3 and 5.6 of TEC report ref. 1204012.005.01A for detailed information.</p> <p>Prior to use of the site by Churngold, the site was reported to have been used for agricultural purposes (fields) prior to being developed as part of the larger Severnside chemical works in the late 1950s or early 1960s with the site itself being reported to have been utilised as a storage/maintenance compound with no chemical processing works being undertaken. Intrusive investigation works undertaken prior to use of the site by Churngold identified no potentially significant contamination issues.</p>
<p>Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)</p>	<p>See Section 5.6 of TEC report ref. 1204012.005.01A for detailed information.</p> <p>The site is understood to have historically been part of a larger chemical works (occupying surrounding land) and was utilised as a storage/maintenance compound. No chemical manufacturing is understood to have taken place on site. Made ground was identified on site and railway sidings are understood to have been present on site together with tarmac roadways, a temporary rubble road and a 'dirt track'. Whilst such</p>

	processes/uses may provide a potential source of contamination, no evidence of potentially significant contamination or the migration of potential contaminants off site was identified during the investigation works undertaken prior to the use of the site by Churngold.
Baseline soil and groundwater reference data	See Section 5.6 of TEC report ref. 1204012.005.01A for detailed information.
Supporting information	All available information for the site is presented in TEC report ref. 1204012.005.01A.

<b>3.0 Permitted activities</b>	
Permitted activities	Application seeks to permit the installation and operation of 2 duplicate production lines that will treat air pollution control (APC) residues to create an aggregate that can be used in block manufacture. The activity comprises 2 listed activities for the production lines, 1 listed activity for the storage of hazardous waste, and a number of DAAs for the handling and storage of waste, raw materials (binder, filler and CO <sub>2</sub> ) and management of surface water
Non-permitted activities undertaken	N/A – all activities within the EP boundary are permitted. Storage of aggregate (product) is outside of the EP boundary.
Document references for: <ul style="list-style-type: none"> <li>• plan showing activity layout; and</li> <li>• environmental risk assessment.</li> </ul>	Drawing B25A Site Layout Drawing, Carbon8 Aggregates Ltd (now O.C.O Technology Limited).  Environmental Risk Assessment dated 2015.

**Note:**

In Part B of the application form you must tell us about the activities that you will undertake at the site. You must also give us an environmental risk assessment. This risk assessment must be based on our guidance (*Environmental Risk Assessment - EPR H1*) or use an equivalent approach.

It is essential that you identify in your environmental risk assessment all the substances used and produced that could pollute the soil or groundwater if there were an accident, or if measures to protect land fail.

These include substances that would be classified as 'dangerous' under the Control of Major Accident Hazards (COMAH) regulations and also raw materials, fuels, intermediates, products, wastes and effluents.

If your submitted environmental risk assessment does not adequately address the risks to soil and groundwater we may need to request further information from you or even refuse your permit application.

4.0 Changes to the activity	
Have there been any changes to the activity boundary?	<p>The site (EP) boundary has been changed once since the grant of the original permit in 2015; that was in 2017 via variation application EPR/HP3638WW/V002 which was granted on 18/07/2017.</p> <p>The variation application (V005) seeks to further amend the EP boundary by way of partial surrender of two areas and the amendment of the remaining area. This is shown in the Site Layout Plan in Appendix C of the 2022 variation application (ref. Site Layout Plan, v1 February 2022).</p>
Have there been any changes to the permitted activities?	<p>The process has fundamentally remained unchanged however there have been a few variations to the permit since the original grant in 2015. These are:</p> <p>Variation V002 in 2017 added three additional waste codes to the EP and amended the site boundary.</p> <p>An admin variation in 2019 reflected the change in company name from Carbon8 Aggregates to O.C.O Technology Limited.</p> <p>Variation V003 was made in 2019 and was returned. This was resubmitted in 2020 (as V004) and sought to add a condition allowing additional EWC codes to be included following successful trial. This was granted in December 2020.</p>
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	No.
Checklist supporting information	<ul style="list-style-type: none"> <li>• Site Plan showing the 2017 change to the boundary – included in the current EP (HP3638WW/V004)</li> </ul>

## 5.0 Measures taken to protect land

The key pollution prevention measure is the use of hardstanding across the external yard area where waste materials are delivered, handled and stored which enables surface water run-off to be captured and directed to an engineered 'wedge pit' which acts as a settlement tank/pond to remove particulates. The surface water is then filtered through a mesh into underground storage tanks. Water can then be pumped back into the process, any overflow from the tank is released through a Penstock valve via an oil inceptor. This is shown on drawing OCO-A-02-100-002-A.

The wedge pit is subject to a weekly visual inspection which look at its condition, how full it is and whether it needs emptying and de-sludging. There are no records of any issues with the wedge pit that would have resulted in any environmental impact.

The hardstanding is subject to general visual inspection day to day, on an unrecorded basis. It is also inspected via the senior leadership team, who are required to undertake a schedule of safety observations at all 3 O.C.O sites and raise potential issues which could result in environmental impact if they are not addressed. Any findings are recorded and addressed via remedial action within a practicable and appropriate timeframe. Items requiring significant investment, or where there are a number of factors playing into the resolution of the problem, are added to the site improvement plan. A total of 65 safety observations have been undertaken in the past calendar year. All personal are also encouraged to report any hazards which may have a negative impact on the environment under the hazard category 'potential loss of containment affecting the environment'. A total of 160 hazards have been reported under this category either through hazards spots / audits or safety observations. This category covers issues such as cracks in the concrete, potential for oil leaks, incorrect storage of COSHH items and integrity of equipment and plant.

EA site visits/inspections are followed with a Compliance Assessment Report (CAR) form. A selection from 2015 – 2022 are summarised as follows:

- CAR Form dated 19 10 2015. This was the initial inspection following grant of the original permit and included the EA's response to the pre-operational condition submission. No issues were raised; the operator was commended on the control measures and procedures implemented to prevent or minimise emissions from the operation.
- CAR Form dated 09 08 2019. No breaches were recorded. There was an observation that there was some surface water ponding on the concrete on the southern side of the process building. Whilst ponding confirms the integrity of the surface, additional drainage was installed following this to improve overall drainage.
- CAR Form dated 30 11 2020. One breach was recorded but this related to reporting (annual returns). A note was also included regarding a cracked area of the concrete site road in the vicinity of the APCr silos (but outside of the EP boundary). A check was carried out at the time of the on-site inspection records for the surface water discharge point (visual inspection of wedge pit), and these appeared to be compliant with the site permit. No breach was reported for this.
- CAR Form dated 17 06 2021. No breaches were recorded. The PPM records were checked, and the site improvement plan. This noted that the concrete repair has been included in the site improvement plan for completion as part of another project. This will be completed as part of the preparatory works for the construction of the new silos and storage bays (once approved). The CAR also referred to the inclusion of non-destructive testing of the silos as an integrity check.
- CAR Form dated 06 05 2022. No breaches were recorded.

Checklist supporting information	of	<ul style="list-style-type: none"> <li>Weekly wedge pit inspection form – completed and any remedial work or action required is identified, dated and signed off</li> <li>Senior leadership team schedule of safety observations (individual's names have been removed for this submission)</li> <li>Health and Safety Database records of environmental incidents, their investigation and remediation are available for the duration of operations under the regulation of the EP</li> <li>Site improvement plan – maintained at management level and reviewed regularly</li> <li>CAR forms dated 2015, 2019, 2020, 2021, and 2020</li> <li>Drawing OCO-A-02-100-002-A.</li> </ul>
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6.0 Pollution incidents that may have had an impact on land, and their remediation		
<p>Any incidents are reported onto the health and safety database and assigned 'owners'. 7 incidents were reported at Avonmouth during the last financial year (October 2021 – September 2022). These were all raised as having a potentially low / minimal impact to the environment. They related to minor spillages or leaks which were identified and cleaned immediately and prevented from entering the drainage system. The leaks comprised hydraulic online oil from split hoses, product leaking from a damaged hose and minor oil spillages from vehicles. The incident classification determines the level of investigation required for each incident. None reported for this period were rated above 'low'. Actions taken to remediate are entered onto the database to enable close out.</p>		
Checklist supporting information	of	<ul style="list-style-type: none"> <li>Summary of environmental incidents reported Oct 2021 – Sept 2022</li> </ul> <p>Note - Health and Safety Database records of environmental incidents, their investigation and remediation are available for the duration of operations under the regulation of the EP.</p>

7.0 Soil gas and water quality monitoring (where undertaken)		
N/A – no soil gas and water quality monitoring has been deemed necessary.		
Checklist supporting information	of	<ul style="list-style-type: none"> <li>N/A</li> </ul>

8.0 Decommissioning and removal of pollution risk		
<p>Describe how the site was decommissioned. Demonstrate that all sources of pollution risk have been removed. Describe whether the decommissioning had any impact on the land. Outline how you investigated and remedied this.</p>		
Checklist supporting information	of	<ul style="list-style-type: none"> <li>Site closure plan</li> <li>List of potential sources of pollution risk</li> <li>Investigation and remediation reports (where relevant)</li> </ul>

9.0 Reference data and remediation (where relevant)		
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Say whether you had to collect land and/or groundwater data. Or say that you didn't need to because the information from sections 3, 4, 5 and 6 of the Surrender Site Condition Report shows that the land has not deteriorated.

If you did collect land and/or groundwater reference data, summarise what this entailed, and what your data found. Say whether the data shows that the condition of the land has deteriorated, or whether the land at the site is in a "satisfactory state". If it isn't, summarise what you did to remedy this. Confirm that the land is now in a "satisfactory state" at surrender.

Checklist  
supporting  
information

of

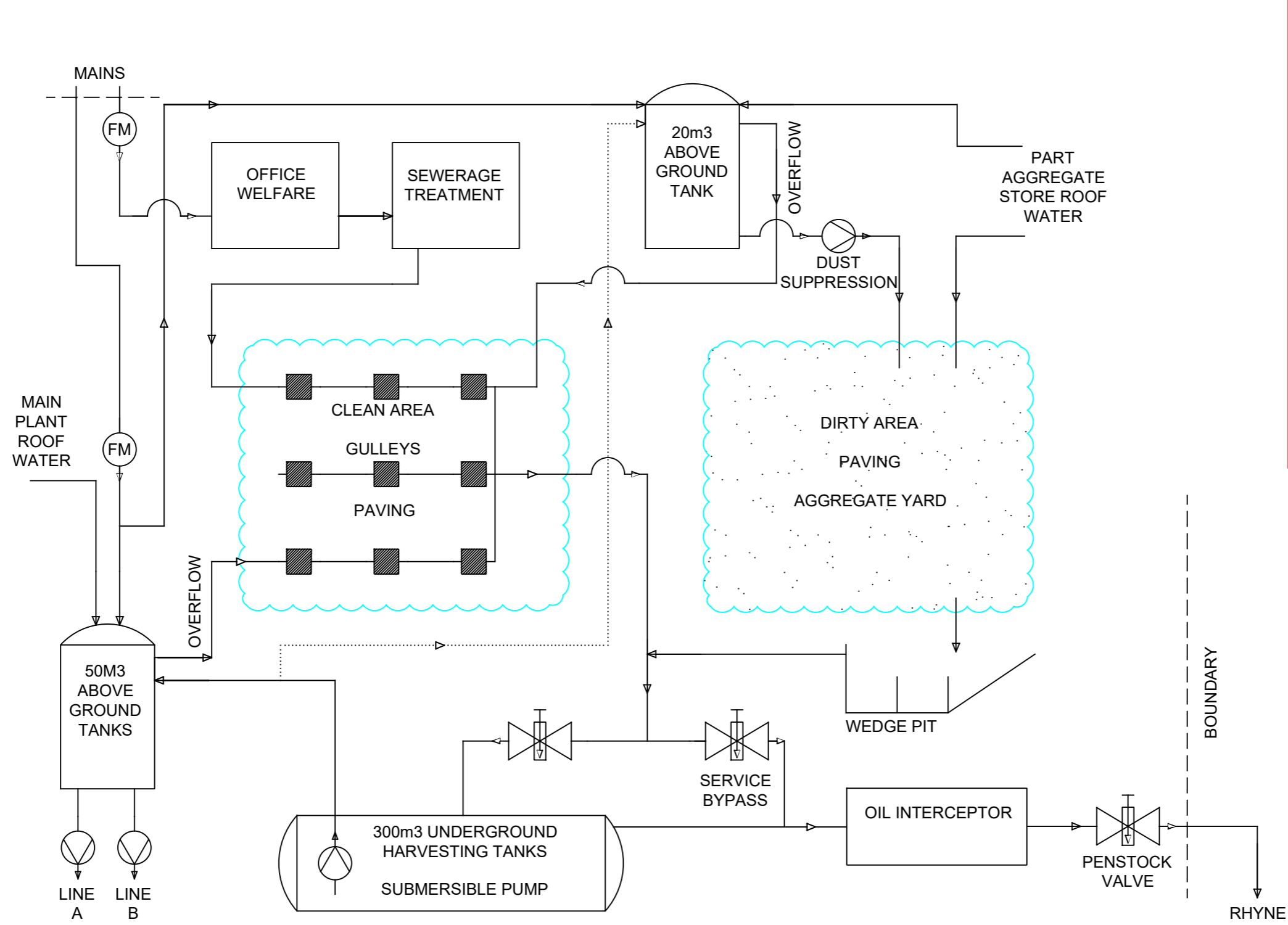
- Land and/or groundwater data collected at application (if collected)
- Land and/or groundwater data collected at surrender (where needed)
- Assessment of satisfactory state
- Remediation and verification reports (where undertaken)






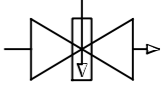
#### 10.0 Statement of site condition

Using the information from sections 3 to 7, give a statement about the condition of the land at the site. This should confirm that:

- the permitted activities have stopped
- decommissioning is complete, and the pollution risk has been removed
- the land is in a satisfactory condition.






 PUMP  
 FLOW METER  
 EXISTING LINE  
 PLANNED LINE  
 SURFACE DRAIN  
 PENSTOCK VALVE

## REVISION TABLE

ZONE	REV	DESCRIPTION	DATE	APPROVED
N/A	A	DRAWN IN CAD	02/10/2020	TB

		Finish	Scale: DNS	Weight:
		Drawn 02/10/20 AM Chk'd 02/10/20 AM App'd 02/10/20 TB		
O.C.O AVONMOUTH			Sheet: 1	Rev. A
WATER REGIME			OCO-A-02-100-002-A	
State Change			Date	Name
Origin: Avo Water Regime JUN20R1			Size: A3	



## Weekly Wedge Pit Inspection Sheet



Date	Inspected by	Comments and action required	Actioned by	Date closed

Revision no: 2.0

Issued date: 14-Aug-19



# SAFETY OBSERVATION INFORMATION

## IMS Management Objectives for 2022/23 – IMP\_GEN\_01

HEALTH & SAFETY			
	Objective	Measure	Target
1	Visible felt safety leadership	Safety Observations	Senior Managers to undertake 6 Safety Observations each per annum, the GM & HSEQ Manager to carry out 12 safety observations (1 per month)

### Safety Observation

All safety Observations **Must** be discussed with the site manager before leaving site and added to the safety observation database by the individual, who has undertaken the safety observation. The link to the safety observation database can be found below.

[https://oco.crm11.dynamics.com/main.aspx?appid=095f0d76-1164-497d-825b-82321d4dd1f0&forceUCI=1&pagetype=entitylist&etn=formus\\_safetyobservation&viewid=8c6b26b3-2352-425d-a456-e7c6c1bfb87b&viewType=1039](https://oco.crm11.dynamics.com/main.aspx?appid=095f0d76-1164-497d-825b-82321d4dd1f0&forceUCI=1&pagetype=entitylist&etn=formus_safetyobservation&viewid=8c6b26b3-2352-425d-a456-e7c6c1bfb87b&viewType=1039)

If any Non-Conformances, Hazards or Incidents are seen during the safety observation, these must also be discussed with the site manager and add to the relevant database by the person undertaking the safety observation. This will allow for the actions to be tracked through the system, insuring they are dealt with.

### Safety Observations hints and tips

- A safety observation is a process that requires an engagement with the workforce to highlight senior management involvement in the business.
- A good safety observation programme will encourage everyone to be more proactive towards safety and openly discuss what is happening around them.
- A good safety observation programme will develop safety culture.
- A safety observation **IS NOT** an incident or hazard observation report, however if hazards and incidents are seen, they should be raised on the relevant database.
- Explain to the person you are with that you are doing a safety observation.
- Observe a task and discuss with the person doing the task about how the task is performed safely.
- You are not the technical expert of the task! And you are not a Health and Safety expert. Therefore, you don't need to fully understand what you are seeing. Engaging with the person doing the task will encourage them to explain what is happening.
- If you think there is something wrong with what you are seeing, you can highlight this and discuss with the person doing the task. Ask to see the procedure, risk assessment, safety system of work, or the approved method of working to verify your thoughts.
- Highlight good practices and behaviours to promote positivity and make individuals feel valued
- If there is not a task happening, then you can discuss a possible or future task with the person.
- If there is not a task happening, then you conduct a hazard spotting exercise with the person.
- Lead feedback and explain what information your safety observation will contain before you disengaged the conversation.

### Safety Observation focuses

**Outside areas** - In outside areas the safety observation should focus on traffic movement around site, mobile plant movement, silo discharge procedures, compliance of drivers/ contractors, stock levels and quality of product. Individuals to be asked for their opinion and if they have any challenges in all the above areas. Condition of ground surfaces



# SAFETY OBSERVATION INFORMATION

**Labs** - Conversations within the lab should focus on the individual’s knowledge, training, challenges, correct use of the lab equipment including PPE and adherence to procedures. Ask the individual to talk you through what they are doing, raise questions where necessary.

**Welfare**- Safety observations in relation to welfare facilities should be based on cleanliness, quality of facilities. Ask individuals for their thoughts and opinions

**Office** – Conversations to focus on display screen equipment, housekeeping around the office, relationship with drivers/customers/visitors, the way information is recorded on to systems/database and if they face any challenges. Are contractors/ visitors / supplies being checked for induction and inducted if needed.

**Control rooms** – Focus on housekeeping within the control room, view any open permits or authorities to commence work (chase these through). If you do not understand them, ask the individual to explain. Watch and ask individuals question on the tasks they are doing. Ensure that all notice boards display relevant information and any forms which are present are filled out correctly. Individuals to be asked for their opinion and if they have any challenges.

**Production Lines / Areas** – Ensure that any permits/ authority to commence work, which have been issued are being followed. Engage with individuals around these documents. Check that the individuals are wearing the correct PPE. Watch and observe them undertaking tasks, asking question as you observe. Ensure there is a risk assessment in place for the task and the individual(s) is aware and adhering to the risk assessment.

**Workshops** – Focus conversation around the task which are being undertaken within the workshop, is the correct equipment being used (LEV, Air feed helmets), are risk assessments in place for the task. Engage with individuals to understand what challenges they face and what ideas they have to make the job/tasks easier.

**Monthly health & Safety focus** – This will be discussed within monthly SLT meetings and must form part of everyone’s safety observation for that month. These focuses will consist of topics such as, HAVS, good hand hygiene, energy usage, emergency procedures, review of actions undertaken on the back of hazards and incidents etc

## Items to check during the safety Observation

- Fire extinguisher – Present, inspected, in good condition, suitable for location, sign posted?
- First aid kits – Present, sign posted, adequate?
- Barrier Creams – Check that dispensers are fill and suitably placed?
- Eye wash stations – Filled, sign posted, suitable placed, solution within date?
- Defibrillator – Sign posted, in good condition, displaying a green tick?
- COSHH items- Area stored on bunds or in COSHH cabinets?
- PPE – is the correct PPE being worn in the areas its required?
- Mobile plant – keys removed when parked, windscreens clear, in good condition, parked correctly?
- Notice Boards – Do they display relevant, up to date information?
- Condition of palnt and equipment

## Safety observation schedule:

1	Avonmouth outside areas & offices = yard, car parks, aggregates bays, plant office, admin office, laboratory, welfare facilities.
2	Brandon outside areas & offices = yards, car parks, aggregates bays, Portakabin/admin block, site welfare facilities and <b>monthly health &amp; Safety focus</b>
3	Leeds outside areas & offices = yard, car parks, aggregates bays, plant office, admin office, laboratory, welfare facilities and <b>monthly health &amp; Safety focus</b>
4	Bridgewater (Leeds) or Wretham site - outside areas / offices / welfare facilities and monthly health & safety focus
5	Avonmouth plant areas = control room, production lines (inside and out), workshops and <b>monthly health &amp; Safety focus</b>
6	Brandon plant areas = control room, production lines (inside and out), workshops and <b>monthly health &amp; Safety focus</b>



# SAFETY OBSERVATION INFORMATION

**7** Leeds plant areas = control room, production lines (inside and out), workshops and **monthly health & Safety focus**

	Oct 22 – Nov 22	Dec 22– Jan 23	Feb 23 Mar 23	Apr 23 May 23	Jun 23 Jul 23	Aug 23– Sept 23
	7	1	2	3	4	5
	6	7	1	2	3	4
	5	6	7	1	2	3
	4	5	6	7	1	2
	3	4	5	6	7	1
	2	3	4	5	6	7
	1	2	3	4	5	6
	7	1	2	3	4	5

	2	3	5	6	7	1
	3	5	6	7	1	2
	5	6	7	1	2	3
	6	7	1	2	3	4
	7	1	2	3	5	6

	Oct	Nov	Dec	Jan	Feb	May	Apr	May	Jun	Jul	Aug	Sept
	1	2	3	4	5	6	7	1	2	3	4	5
	6	7	1	2	3	4	5	6	7	1	2	3



# SAFETY OBSERVATION INFORMATION

Areas to also consider when observing a task / person working:

<b>AT RISK CATEGORIES (when observing the person(s) or task)</b> Consider the following. If more than one person is observed, then place two ticks in the appropriate box									
Position of people	Tick	Procedures	Tick	PPE	Tick	Tools and equipment	Tick	Reactions of people	Tick
Struck against/by		Risk assessment		Eyes/Face		Not right for job		Adjusting PPE	
Falls from height		SOP		Ears		Used incorrectly		Changing position	
Slips/trips		Permit to work		Head		Unsafe condition		Rearranging job	
Electrical hazards Confined Space		Isolation/Lock off		Hands/arms		Poor work area		Stopping the job	
		Lifting plan		Feet/legs		Tools/grip		Untrained for the job	
Traffic/mobile plant		Fire		Trunk		Noise		Not know/understood	
Moving machinery		First Aid		Respiratory		Vibration		<b>ENVIRONMENT</b>	
Heat/cold		Signs/Notices		Out of date		PAT tested		Fuel/oils	
Noise/dust		Spillage		Damaged		Hose damage		Cleanliness	
Vibration		Excavations		Unhygienic		Illegal repairs		Warning signs	
Overhead Cables		Security		Appropriate		Lighting		Advisory signs	
COSHH		Welfare cleanliness		Harness worn		Gas secure		Waste	
Trapping		Control of contractors		Harness attached		Plant damage		Skips/bins	
Manual handling		Visitors		Harness inspection		Welding area		Lighting	
Drowning/Engulfed		Registers in date		Insurance list				Material build up	
Access/egress		Scaffolds/towers		Lanyards				Ground conditions	





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

Site	Avonmouth Aggregate Facility EPR/HP3638WW		Permit Ref	HP3638WW			
Operator/ Permit holder	Carbon8 Aggregates Limited						
Date	19/10/2015		Time in	14:00	Out	16:00	
What parts of the permit were assessed	Initial Inspection and response to pre-operational condition.						
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge	
Recipient's name/position	Shane Pearson, Stephen Roscoe					Date issued	23/11/2015
Officer's name	P Scotford, Victoria Nichols						

**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	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	A	
	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	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	A	
h) Resource efficiency	1. Efficient use of raw materials	A	
	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

<b>Number of breaches recorded</b>	0	<b>Total compliance score</b> (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.

Thank you for the opportunity to inspect your new Avonmouth facility and walking us through the process.

It was good to see and discuss the control measures and procedures put in place to prevent or minimise emissions from the operation.

It was also good to see that resource efficiency has been considered for the start with rain water harvesting in place and proposals to test lubrication oils rather than just replacing them periodically.

Thank you for Stephen Roscoe's email dated 16/11/2015 with the response to pre-operational measures required in Table S1.4 of your environmental permit. I can confirm that this submission fulfils permit condition 2.4.1.



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

Site	Avonmouth Aggregate Facility EPR/HP3638WW	Permit	HP3638WW
Operator/ Permit	Carbon8 Aggregates Limited	Date	10/10/2015

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 <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](mailto: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.



# EPR Compliance Assessment Report

Report ID: HP3638WW/0252947

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

Site	Avonmouth Aggregate Facility EPR/HP3638WW	Permit Ref	HP3638WW	
Operator/ Permit holder	Carbon8 Aggregates Limited			
Date	01/11/2015	Time in		Out
What parts of the permit were assessed	Waste returns only			
Assessment	Report/data review	EPR Activity:	Installation: X	Waste Op: <input type="checkbox"/>
				Water Discharge: <input type="checkbox"/>
Recipient's name/position	The Company Director and/or Secretary		Date issued	24/11/2015
Officer's name	Daren J Searle-gardiner			

## 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	N	
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	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	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	C4	4.2.2
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

<b>Number of breaches recorded</b>	1	<b>Total compliance score</b> (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.

You did not submit your waste return on time for the period Jul-Sep 2015 as required under condition 4.2.2. You have been scored for the late submission. If you have any questions please contact your local office.



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

Site	Avonmouth Aggregate Facility EPR/HP3638WW	Permit	HP3638WW
Operator/ Permit	Carbon8 Aggregates Limited	Date	01/11/2015

**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.	<input checked="" type="checkbox"/>
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.	<input type="checkbox"/>
We will now consider what enforcement action is appropriate and notify you, referencing this form.	<input type="checkbox"/>

**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			
G4	C4	If you have not already sent in your waste return for period Jul-Sep 2015 please send it within 4 weeks of the date of issue of this CAR form. Returns were due by 31st Oct 2015. In future please make sure your returns are submitted on time as per your permit conditions.	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 <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

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- 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](mailto: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.





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

Site	Avonmouth Aggregate Facility EPR/HP3638WW		Permit Ref	HP3638WW		
Operator/ Permit holder	Carbon8 Aggregates Limited					
Date	07/07/2016		Time in	09:15	Out	12:45
What parts of the permit were assessed	Waste acceptance and site tour					
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge
Recipient's name/position	Shane Pearson					
Officer's name	P Scotford, Jill Rooksby Paul Ferne, Sarah Dennis, Chris Hall		Date issued	02/08/2016		

**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 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 N
	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 A
	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 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 A
	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

<b>Number of breaches recorded</b>	0	<b>Total compliance score</b> (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.

Thank you for arranging the presentation and site tour for my colleagues, Jill Rooksby, Sarah Dennis, Chris Hall and Paul Ferne.

The purpose of the site inspection was to audit the waste acceptance procedures and hazardous waste consignment notes for APCr delivered to the site.

### **Hazardous Waste Consignment Notes.**

I checked a sample of hazardous waste consignment notes:-

OEW452/G1612 delivered by Grundon Waste Management CB/SM3080SR  
VIRODO/G0419 delivered by Abbey CB/DE5734OV  
LAKES/C0194 again delivered by Grundon Waste Management.

These consignment notes appeared to have been completed correctly. HP14 as well as HP4 had been used to describe the hazard. As I mentioned in my email dated 15th June 2016 this code needs to be added to Table 2.2 of the environmental permit the next time a variation takes place.

### **Waste Acceptance Procedures.**

Paula Carey talked me through the waste acceptance procedures. Details of all incoming waste are logged on to the computer system. Before a tanker can discharge a sample of APCr is tested for chlorine content, density, colour and moisture content. Once a month a sample from each producer goes off site for leach ability testing.

Each APCr source has a range within which the results from the acceptance testing must fall. The computer system flags up any results outside the range. If a sample falls out of the range a non-conformance record is produced and emailed to Paula Carey.

All staff undertaking waste accepting testing have been trained in house by Paula Carey. I checked the training records for Connie Matthews, Darrel Tilley and Lisa Barnwell

I observed Lisa Barnwell accepting a load and testing the accompanying sample in line with the procedures before permitting the driver to discharge his tanker.

Previous problems had been identified when tankers had not been properly cleaned after being used to carry other powders. Where possible tanks are being used to back haul lime to the incinerator to minimise cross contamination.

Waste acceptance procedures appeared to be satisfactory.

## Site Tour

The processing area appeared clean and tidy. However it was noticeable that there was some spillage from the conveyer belt removing aggregate from the processing building to the aggregate storage bays. This conveyor is situated outside of the permitted area.

Density testing is undertaken as part of the waste acceptance procedures to help prevent silos from being over filled. Silos are currently dipped to assess level. The company is investigating the use of a radar system for measuring the level of APCr within the Silos. I would be interested to hear the outcome of these investigations.



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

Site	Avonmouth Aggregate Facility EPR/HP3638WW	Permit	HP3638WW
Operator/ Permit	Carbon8 Aggregates Limited	Date	07/07/2016

**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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
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**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

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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

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- providing public register information to enquirers
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- preventing breaches of environmental law
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### Disclosure of information

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### Customer charter

#### What can I do if I disagree with this compliance assessment report?

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

Site	Avonmouth Aggregate Manufacturing Facility - EPR/HP3638WW	Permit Ref	HP3638WW		
Operator/ Permit holder	Carbon8 Aggregates Limited				
Date	07/08/2019	Time in		Out	
What parts of the permit were assessed	Change of trading name				
Assessment	Report/data review	EPR Activity:	Installation: X	Waste Op:	Water Discharge:
Recipient's name/position	Shane Pearson			Date issued	08/08/2019
Officer's name	P Scotford				

**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 Conditions and Compliance Summary			Condition(s) breached
a) Permitted activities	1. Specified by permit	N	
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	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	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	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

<b>Number of breaches recorded</b>	0	<b>Total compliance score</b> (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.

### Purpose:

Data review following receipt of information from the permit holder on 6 August 2019 notifying the regulator of the permit holder's intention to change the company name from Carbon8 Aggregates Limited to O.C.O. Technology Limited in August 2019.

Condition 4.3.4 requires the permit holder to notify the Environment Agency within 14 days of the occurrence of the following matters, where the operator is a registered company:

(a) any change in the operator's trading name, registered name or registered office address.  
Notification was received in the form of a letter signed by Managing Director, Steve Greig and dated 5 August 2019 which states that "The company ownership, registration number, bank details and telephone contact details all remain exactly the same" and indicates that these changes will be completed by the end of August.

This Compliance Assessment Report (CAR) Form details what the permit holder must now do in order to submit an administrative only variation application to change the permit into the new company name.

### Administrative only variations:

In order to vary the name and/or address on the permit but where the legal entity has not changed, you will need to submit an application to vary the permit to the Environment Agency.

You will need to complete the following documents and send them to the Environment Agency.

#### - Form Part A: apply for an environmental permit (about you) -

<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-a-about-you>

#### - Form C0.5: administrative change to an environmental permit -

<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c05-administrative-variation-of-a-standard-or-bespoke-permit>

All the completed application forms need to be sent to the Environment Agency to:

Email: [PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk) or

Postal address:

Permitting Support Centre,  
Environmental Permitting Team,  
Environment Agency,  
Quadrant 2  
99 Parkway Avenue  
Parkway Business Park  
SHEFFIELD  
S9 4WF

### Fees:

The Environment Agency does not charge for administrative only variations because they do not require any kind of technical assessment and are likely to take less than 2 hours to process.

[Source: <https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance#admin>]


However, if you have more than one permit that you are looking to vary by way of an administrative only variation, you are encouraged to submit all the permit variations at the same time to ensure the efficient processing of the applications.

### Pre-application advice:

The information contained above constitutes free basic pre-application advice. Should you require further enhanced application advice which is chargeable, you should complete the following online form at:

<https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form>

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 <b>Environment Agency</b>	<b>EPR Compliance Assessment Report</b>		Report ID: HP3638WW/0338901
	<b>This form will report compliance with your permit as determined by an Environment Agency officer</b>		
Site	Avonmouth Aggregate Manufacturing Facility - EPR/HP3638WW	Permit	HP3638WW
Operator/ Permit	Carbon8 Aggregates Limited	Date	07/08/2019

<b>Section 3- Enforcement Response</b>		<b>Only one of the boxes below should be ticked</b>	
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.		<input type="checkbox"/>	
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.		<input type="checkbox"/>	
We will now consider what enforcement action is appropriate and notify you, referencing this form.		<input type="checkbox"/>	

<b>Section 4- Action(s)</b>			
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 <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

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- 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](mailto: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.



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

Site	Avonmouth Aggregate Manufacturing Facility - EPR/HP3638WW	Permit Ref	HP3638WW		
Operator/ Permit holder	Carbon8 Aggregates Limited				
Date	09/08/2019	Time in	10:00	Out	12:00
What parts of the permit were assessed	Maintenance, Hazardous Waste Consignment Notes				
Assessment	Site Inspection	EPR Activity:	Installation: X	Waste Op:	Water Discharge:
Recipient's name/position	Shane Pearson				Date issued
Officer's name	P Scotford				10/09/2019

**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
a) Permitted activities	1. Specified by permit	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	A	
	3. Materials acceptance	A	
	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	A	
	2. Noise	N	
	3. Dust/fibres/particulates & litter	A	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	A	
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	A	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	A	
	2. Energy	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, 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.

Operations on site were extremely busy due to a breakdown at the companies Brandon site and the Grundons hazardous waste landfill being closed.

### Maintenance of Plant and Equipment

Shane confirmed that to minimise down time the company has a critical spares inventory to the value of approximately £100,000 held across the 3 operational sites. Other critical spares are on a known short supply time from suppliers. The site operates a preventative maintenance programme with equipment run time colour coded, green, amber and red, with maintenance/ consumable replacements such as filters tending to taking place prior to manufacturer's recommendations and before equipment entering the red zone. Average fail data is collected to help determine maintenance schedules, the replacement of consumables and equipment.

During the site tour surface water was observed ponding on the concrete on the southern side of the processing building. The company was planning to install additional drainage to improve surface water drainage.

### Energy Efficiency

Shane mentioned that the company had investigated the potential of onsite solar power generation however the roof alignment meant this was not a viable option. The company is currently considering exploring wind generation. Further energy efficiency measures put in place include LED lighting, variable speed motors and a 15 minute automatic shutdown stopping conveyors and motors feeding a piece of equipment which has failed or been turned off for maintenance. Resource Efficiency.

The company has been conducting trials on new product ranges including the potential to use other waste streams as fillers. Unless these proposed fillers already have an appropriate end of waste position agreed with the Environment Agency, aggregate and other products manufactured with these waste derived fillers will not benefit from the company's currently agreed end of waste position for its aggregate.

The Environment Agency has set up a new chargeable definition of waste assessment tool which you may like to use to determine if these new products can meet end of waste status. Details of the new assessment tool can be found at:-


<https://www.gov.uk/guidance/turn-your-waste-into-a-new-non-waste-product-or-material>

Whilst on site Shane showed me a sample of a potential new aggregate product made from shredded nappy fibres. Whilst I do not wish to pre judge any assessment, have you considered any implications the plastic content of the nappy fibre might have on the future recycling of the aggregate after its initial use? Would the recycling of the aggregate facilitate the release to the environment of micro plastics?

If wastes other than 19 01 07\* and 19 01 13\* are going to be imported into Avonmouth to manufacture new products you will need to apply for a variation of your environmental permit.

## Hazardous Waste

Whilst on site I conducted an inspection of the hazardous waste consignment notes for waste delivered to the site. Whilst the final Part E of the notes completed by Carbon8 staff appeared to be correct, I noted a number of minor issues relating to the consignor and carriers declarations in Parts C and D. of several notes. I will be making the relevant carriers and consignors aware of these issues.

 Environment Agency	<b>EPR Compliance Assessment Report</b>	Report ID: HP3638WW/0341530	
<b>This form will report compliance with your permit as determined by an Environment Agency officer</b>			
Site	Avonmouth Aggregate Manufacturing Facility - EPR/HP3638WW	Permit	HP3638WW
Operator/ Permit	Carbon8 Aggregates Limited	Date	09/08/2019

<b>Section 3- Enforcement Response</b>	<b>Only one of the boxes below should be ticked</b>
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
We will now consider what enforcement action is appropriate and notify you, referencing this form.	<input type="checkbox"/>

<b>Section 4 Action(s)</b>			
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 <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

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- 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.

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#### What can I do if I disagree with this compliance assessment report?

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

Site	Avonmouth Aggregate Manufacturing Facility - EPR/HP3638WW		Permit Ref	HP3638WW		
Operator/ Permit holder	Carbon8 Aggregates Limited					
Date	09/08/2019	Time in	10:00	Out	12:00	
What parts of the permit were assessed	Maintenance, Hazardous Waste Consignment Notes					
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge
Recipient's name/position	Shane Pearson					
Officer's name	P Scotford		Date issued	10/09/2019		

**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
a) Permitted activities	1. Specified by permit	N	
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	5. Plant and equipment	A	
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**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**

<b>Number of breaches recorded</b>	0	<b>Total compliance score</b> (see section 5 for scoring scheme)	0
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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)
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This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

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The company has been conducting trials on new product ranges including the potential to use other waste streams as fillers. Unless these proposed fillers already have an appropriate end of waste position agreed with the Environment Agency, aggregate and other products manufactured with these waste derived fillers will not benefit from the company's currently agreed end of waste position for its aggregate.

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 <b>Environment Agency</b>	<b>EPR Compliance Assessment Report</b>	Report ID: HP3638WW/0341530	
<b>This form will report compliance with your permit as determined by an Environment Agency officer</b>			
Site	Avonmouth Aggregate Manufacturing Facility - EPR/HP3638WW	Permit	HP3638WW
Operator/ Permit	Carbon8 Aggregates Limited	Date	09/08/2019

### 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			



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

Site	Avonmouth Aggregate Production Facility - EPR/HP3638WW		Permit Ref	HP3638WW		
Operator/ Permit holder	OCO Technology Limited					
Date	30/11/2020		Time in	10:00	Out	1230
What parts of the permit were assessed	Site Infrastructure, TCM, Returns,					
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge
Recipient's name/position	Stephen Manley, Lee Thompson					
Officer's name	P Scotford		Date issued	21/12/2020		

**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	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	A	
	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	1. Air	N	
	2. Land & Groundwater	A	
	3. Surface water	A	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	N	
	3. Dust/fibres/particulates & litter	A	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	A	
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	A	
	4. Reporting & notification	C4	4.2.2
h) Resource efficiency	1. Efficient use of raw materials	A	
	2. Energy	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, 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>	1	<b>Total compliance score</b> (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.

### Staffing

Steve Manley is currently studying for his WAMITAB certificate. In the meantime technical competent management is being covered by Paul Barber the Manager of the Brandon Manufacturing Plant in Suffolk. This is being done by a mixture of site visits and remotely via regular telecommunications. In the future the company is proposing to adopt the Competence Management System (CMS) to demonstrate technical management across the company. This should reduce the risk of the company losing its technical management status due to staff moving on.

Even with the impact of COVID 19 the employment situation in the local area still appears buoyant which has made staff retention and recruitment challenging. A new deputy manager has just been interviewed. It is proposed that they will also complete their WAMITAB certificate.

### Hazardous Waste Consignment Notes

An examination of the most recent hazardous waste consignment notes for deliveries to the site showed they were being completed correctly by the OCO staff. However it was noted that Part D of some consignment notes was not always being fully completed by staff at Hartlebury EFW Facility at Kidderminster when their APCR is collected by Grundons. I would be grateful if you could follow this up with your customers.

### Site Inspection Infrastructure

During the inspection it was noted that aggregate was being dug out from beneath a damaged conveyor between the processing and aggregate storage building. During the design phase of the plant the impact of the weather and the nature of the product was not fully appreciated. To help reduce these impacts on the conveyors and a repetition of this incident the company has long term plans to enclose these transfer conveyors within a new building.

Although outside the permitted area the concrete site road/yard surface in the vicinity of the APCR silos has become badly cracked. Should an incident occur involving a spillage from the silos or a vehicle offloading there is the potential for ground contamination to occur, especially if APCR gets washed in to the cracks. Such contamination could cause issues at a later date when it comes to surrendering your permit. I would therefore suggest that the repair of the site roads is included in next year's maintenance plan. A check was carried out of the onsite inspection records for the surface water discharge point. These appeared to be compliant with site permit.

### Annual Returns

As well as making an annual Pollution Inventory Return to the Environment Agency, condition 4.2.2 of the above permit requires a report on the performance of the activities over the previous year to be submitted to the Environment Agency by the 31st January each year. Our records show that no such reports have been received in previous years hence the score of 4 above under the heading Reporting and Notification.

This report should include the information required in Schedule 4 of your permit, waste throughput for recovery, energy and water usage. I have attached to the covering email the prescribed forms for water and energy use. It would be good practice if you also submit a an interpretive review of the data, for instance if a decrease in water use was a result of a decrease in production or due

to water saving initiatives being introduced during the year.  
 This is a generic permit condition so you may wish to check that your other sites are also making these returns.

**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.	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			
G4	C4	Complete and submit annual returns	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

\*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?

You must notify your local officer within 28 days of receipt if, you wish to challenge any part of 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](mailto: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.



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

Site	Avonmouth Aggregate Production Facility - EPR/HP3638WW		Permit Ref	HP3638WW		
Operator/ Permit holder	OCO Technology Limited					
Date	17/06/2021		Time in	08:30	Out	10:30
What parts of the permit were assessed	see Below					
Assessment	Site Inspection	EPR Activity:	Installation: X	Waste Op:	Water Discharge:	
Recipient's name/position	Lee Thompson					
Officer's name	P Scotford		Date issued	25/06/2021		

**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**

Permit Conditions and Compliance Summary	Condition(s) breached
<b>a) Permitted activities</b>	
1. Specified by permit	N
<b>b) Infrastructure</b>	
1. Engineering for prevention & control of pollution	A
2. Closure & decommissioning	N
3. Site drainage engineering (clean & foul)	N
4. Containment of stored materials	A
5. Plant and equipment	A
<b>c) General management</b>	
1. Staff competency/ training	A
2. Management system & operating procedures	A
3. Materials acceptance	A
4. Storage handling, labelling, segregation	N
<b>d) Incident management</b>	
1. Site security	N
2. Accident, emergency & incident planning	N
<b>e) Emissions</b>	
1. Air	N
2. Land & Groundwater	N
3. Surface water	N
4. Sewer	N
5. Waste	N
<b>f) Amenity</b>	
1. Odour	A
2. Noise	N
3. Dust/fibres/particulates & litter	A
4. Pests, birds & scavengers	N
5. Deposits on road	A
<b>g) Monitoring and records, maintenance and reporting</b>	
1. Monitoring of emissions & environment	N
2. Records of activity, site diary, journal & events	N
3. Maintenance records	A
4. Reporting & notification	A
<b>h) Resource efficiency</b>	
1. Efficient use of raw materials	A
2. Energy	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, 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>	0	<b>Total compliance score</b> (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.

Thank you for your time on Thursday.

### Staffing

Steven Manley had left the company. As a temporary measure the technically competent management role is being filled by Paul Barber who also manages the companies Leeds operation. Paul is fulfilling this role by physical visits to Avonmouth and remotely via computer links. A new plant manager for Avonmouth, Chris Steer had just been appointed. Chris is currently being inducted into business at the Leeds plant. Once he has settled in, it is the company's intention to put Chris through the relevant Wamitab qualification.

### Maintenance

During the inspection I viewed the company's system for planning and recording planned preventative maintenance PPM and for reactive maintenance. They currently consisted a number of spread sheets showing the PPM for the week and a sign off procedure. To ensure work had been completed the system was checked during the weekly site engineering meetings. Lessons learnt and improvements were recorded and audited via the minutes from these meetings.

Reactive maintenance and improvements to the site infrastructure were logged on the company's site improvement plan SIP with some safety critical actions also being recorded on the senior leadership team hazard database. One action audited during the inspection was an issue with doors to electrical cabinets being left open to prevent overheating, this had the potential to allow the ingress of dust in to the cabinets therefore cooling fans were being installed.

Lee confirmed that non-destructive testing to check the integratory of the silos has been included in the plan. The work to repair the conveyor highlighted in the previous compliance assessment form was on the SIP, as was the proposed work to repair the yard surfacing. Although this work was currently being deferred as there was the potential to incorporate it in to another proposed project.

In the near future the company will be moving the above PPM system over to the Smart Spanner PPM system. This will have the additional benefit of sending out automatic text alarms to the engineering staff.

### Energy Efficiency

The company has introduced electric or hybrid cars across its company car fleet and will be installing charging points on site. They actively monitor electricity use per tonne of product produced, regularly checking the site for issues which may increase energy usage such as leaking air lines. When redirecting loads of APCR between sites the company attempts to minimise the travel distance. The company is also considering alternative fuels for its mobile plant.

### Water Use

I appreciate that yard and roof water is collected and used as process water. However to reduce your reliance on the public water supply for the rest of your process water requirements have you considered installing your own borehole to extract non potable ground water. This would reduce the demand on the public supply, help with security of your water supply especially if climate change forced restrictions on supply and has potential financial savings. If you would like to check the quality of the local groundwater prior to installing a borehole, I'm aware that Wainwrights have a borehole for dust suppression water at their asphalt plant down the road from you. Depending on the volume of water abstracted you may require an abstraction licence from the Environment Agency. Details of this process can be found in the link below.

<https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence>

### Notifications and Reporting

A check of the six hazardous waste consignment notes for deliveries of air pollution control residues received during the morning showed that all parties were completing the consignment notes correctly.

Thank you for the submission of the annual returns as required on the last compliance assessment report. I look forward to receiving this year's return in January.

There were no immediate plans to conduct trials with new waste types. However the company was investigating additional certification for the final product to increase its marketability.

Grundons were in the process of moving off the site, freeing up the workshops for OCO to use as additional office space and their own maintenance workshop. A planning application is likely to be submitted in the near future to cover this work.

### Section 3- Enforcement Response

Only one of the boxes below should be ticked

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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

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- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
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**This form will report compliance with your permit as determined by an Environment Agency officer**

Site	Avonmouth Aggregate Production Facility - EPR/HP3638WW	Permit Ref	HP3638WW		
Operator/ Permit holder	OCO Technology Limited				
Date	06/05/2022	Time in	10:00	Out	11:15
What parts of the permit were assessed	Meeting to discuss submission of LEP				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	Chris Steer, Lee Thompson				
Officer's name	P Scotford	Date issued	17/05/2022		

**Section 1 - Compliance Assessment Summary**

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Permit Conditions and Compliance Summary			Condition(s) breached
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	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
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	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
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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	A	
h) Resource efficiency	1. Efficient use of raw materials	A	
	2. Energy	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, 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>	0	<b>Total compliance score</b> (see section 5 for scoring scheme)	0
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## 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.

It was good to finally meet Chris Steer in person.

Thank you for the annual returns submitted earlier in the year.

The main purpose of the inspection was to discuss the possibility of the Environment Agency agreeing to a Local Enforcement Position (LEP) relating to the substantial variation submitted in February 2022 to increase the volume of carbon dioxide, air pollution control (APC) residues, cement binders, and sand stored on site and the associated changes to the site infrastructure. And to add a third production line within the existing building. I can confirm that I have submitted a business case for an LEP to be granted. If any more questions arise whilst this is discussed at a local level, I will let you know.

One of the main drivers for the LEP was to allow for extra capacity for carbon dioxide storage. This would help buffer the current volatile nature in carbon dioxide availability and fluctuations in price. OCO Technology Ltd are actively seeking alternative sources of carbon dioxide. Please keep me informed on how these developments go as the EA is keen to promote the use of other potential sources for carbon dioxide especially from industries we regulate and who currently vent excess carbon dioxide to atmosphere.

The repairs to the yard surfacing outside the current permitted area that has been mentioned on previous compliance assessment reports still needs to be undertaken. It is proposed to incorporate this work into the preparatory works for the construction of the new silos and storage bays.

Would you be happy to host a visit for Feja Lesniewsha? Feja is a researcher at UCL working on the National Interdisciplinary Circular Economy Research (NICER) programme in the Interdisciplinary Circular Economy Centre for Mineral-based construction materials.

Feja recently gave a short summary of the work she is undertaking at an internal Environment Agency cement lime and minerals sector meeting I attended. She seemed very interested in your product.

NICER is a collaboration between investigators from a wide range of disciplines, including biology, geology, soil science, environmental engineering, materials science, materials engineering, civil engineering, structural engineering, architecture, construction management, information management, mathematics, accounting, finance, economics, policy, law, and archaeology. The aim is to develop the scientific and socio-economic understanding and technological basis for design and implementation of systems, processes and policy that will support the transition to a sustainable Circular Economy, particularly for built environment infrastructure, using case studies for mineral-based construction materials. [Interdisciplinary Circular Economy Centre for Mineral-based Construction Materials - UCL – University College London](#)

The programme is addressing how we can best use regulatory tools and changes to standards to

facilitate and move towards greater circularity? Greater resilience, more durability, design (potential for disassembly), how do we do that?

**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.	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			

## 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 can raise a dispute through our official [complaints procedure](#).

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.