

EPR Compliance Assessment Report

Report ID: CP3038CM/0366094

This form will report compliance with your permit as determined by an Environment Agency officer								
Site	Park Grounds Farm - EPR/CP3038CM			Permit Ref	DP3797SE			
Operator/ Permit holder	Crapper & Sons Landfill Limited							
Date	05/03/2020 Time in 10:00 Out 13:0					13:00		
What parts of the permit were assessed	Meeting to discuss variation and site inspection							
Assessment	Site Inspection	EPR Activity:	Installation X	Waste Op Water Discharge			arge	
Recipient's name/position	Richard Crapper							
Officer's name	P Scotford			Date issued	01/	04/202	0	

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

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

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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.

Meeting to discuss the variation to the environmental permit and site inspection.

Gasification plant.

Refgas Ltd are no longer the gasification technology provider. They have been replaced by Enruption Energy UK Ltd. The six Refgas gasification units will be removed replaced with three Enruption gasification units. The syngas produced from these units will feed in to the existing gas clean up equipment a part from the initial hot gas filters which are to be replaced by an additional cyclone. As a proof of concept it is proposed to just replace the gasification units on one line and commission it before modifying the other two lines.

As requested Sophie Rainey has submitted a new Commissioning Plan for the installation of the new gasification units. Due to the increased public interest in your activities, as well as the fortnightly updates as out lined in the plan can you please inform me 24hrs in advance of any hot commissioning work with an indication of its proposed duration.

I note from his CV that the proposed Commissioning Manager, Anthony Campisi is based in Australia. Is he currently in the UK or is he proposing to manage the Commissioning remotely. In the current health crisis do you envisage any significant slippage to the time scales included in the Commissioning Plan.

MRF plant.

The floor and side walls of the MRF building have been constructed. The waste sorting operation has been relocated to inside the shell of the building. During the windy weather it has also been used to store waste destined for the landfill. It was hoped that roofing works would begin in April.

The permit variation proposes to change the odour control measures for the MRF from a bio filter to using an AirSteril system. Please see the email correspondence between myself and Sophie regarding this matter.

If you are interested in pursuing this as an outlet for such waste from your site their details are RPC BPI Recycled Products a division of British Polythene Industries PLC. My contact details are Sian Miles 01773 841852 sianmiles@bpipoly.com www.bpirecycling.co.uk

Composting.

Later in the year it is proposed to undertake an audit of the composting process. The composting operation did not appear odourous at the time of inspection. A project had taken place to attempt to process the oversize material to the point it could be used as a biofuel feedstock. The resulting material looked very good with minimal plastic contamination.

Wood chipping.

The electrical supply has been installed for the wood shredder and the eddie current separator. Can you please confirm when it has been connected so you no longer need to operate the diesel generator is no longer required.

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Operator/ Permit	Crapper & Sons Landfill Limited	Date	05/03/2020		

Section 3- Enforcement Response	Only one of the boxes below should be ticked
	es an offence and can result in criminal prosecutions and/or suspension or essment in Section 2 and the steps you need to take in Section 4 below.
	resent we do not intend to take further enforcement action in respect of preclude us from taking enforcement action if further relevant
	en issued with a warning. At present we do not intend to take further aking additional enforcement action if further relevant information
We will now consider what enforcement action is app	ropriate and notify you, referencing this form.

Section	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 Secti	See Section 1 above						

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Section 5 - Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- advise on corrective actions verbally or in writing
- require you to take specific actions in writing
- issue a notice
- require you to review your procedures or management system
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you.

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and or suspension or revocation of the permit.
- A civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response for this/these offence(s).

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- ensure you comply with other legislative provisions which may apply.

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance which could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 - General Information

Data protection notice

The information on this form will be processed by the Environment Agency to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The Environment Agency may also use and/or disclose it in connection with:

- offering/providing you with its literature/services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The Environment Agency may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The Environment Agency will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within 28 days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

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

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. 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.

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