



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

Site	Escrick Soil Landfill Site		Permit Ref	406424		
Operator/ Permit holder	ESCRICK ENVIRONMENTAL SERVICES LIMITED					
Date	24/11/2023		Time in	14:26	Out	14:40
What parts of the permit were assessed	Methane emissions survey					
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge
Recipient's name/position	Craig Brown (TCM)					
Officer's name	Robin Bispham, Anthony Sorrell		Date issued	12/12/2023		

### 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
a) Permitted activities	1. Specified by permit A
b) Infrastructure	1. Engineering for prevention & control of pollution N
	2. Closure & decommissioning N
	3. Site drainage engineering (clean & foul) N
	4. Containment of stored materials N
	5. Plant and equipment N
c) General management	1. Staff competency/ training 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 A
	2. Land & Groundwater N
	3. Surface water N
	4. Sewer N
	5. Waste N
f) Amenity	1. Odour N
	2. Noise N
	3. Dust/fibres/particulates & litter N
	4. Pests, birds & scavengers N
	5. Deposits on road N
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment N
	2. Records of activity, site diary, journal & events N
	3. Maintenance records N
	4. Reporting & notification N
h) Resource efficiency	1. Efficient use of raw materials N
	2. Energy N

KEY: C1, C2, C3, C4 = CCS breach category ( \* suspended scores are marked with an asterisk),

A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

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.

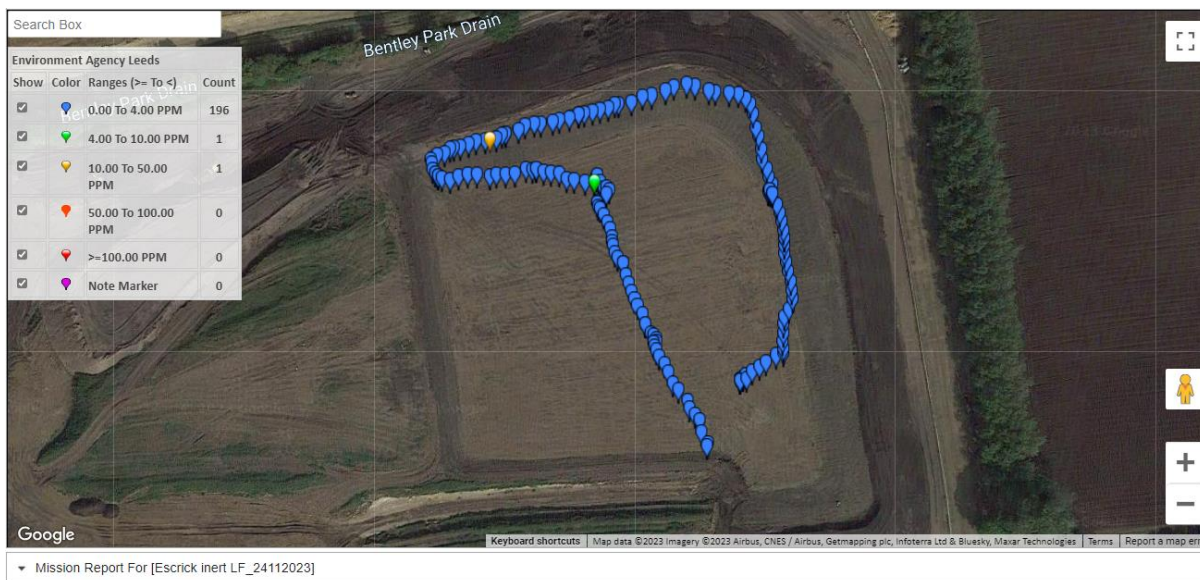
### 1.0 Scope

This CAR Form records the findings of a methane emissions survey that was carried out on 24 November 2023. The survey was carried out as part of a wider survey that also covered the adjacent Escrick Environmental Services Ltd Standard Rules permit site (permit EPR/DB3000UP [EAWML402437]) and Acumen Waste Services Ltd Escrick Waste Treatment Facility site (permit EPR/KB3739AJ [EAWML104658]). The survey followed a similar survey that was carried out on 23 June 2023. Escrick Environmental Services TCM, Craig Brown, was present during the survey.

### 2.0 Methane Emissions Survey

**2.1** A methane emissions survey, similar to the one carried out on 23 June 2023, was carried out using a Geotech TDL 500 methane detector. On this occasion our GPS data-logging system was available and so this was used throughout the survey to log the data. The TDL works on the principle of infrared absorption spectroscopy to detect surface methane concentrations at the parts per million (ppm) level. Typical background surface methane levels in the UK are below 5 ppm and for the purposes of the type of emission survey at this site, we would only consider readings above 10 ppm to be significant (allowing for measurement uncertainty). The infrared beam is tuned to a methane specific absorption wavelength and is therefore unresponsive to other hydrocarbons. The serial number of the unit is 971221. The unit is calibrated every two years in accordance with the manufacturer's recommendations, the last calibration being undertaken in April 2022.

**2.2** Having the data-logger available on this occasion means that we are able to present the data more comprehensively and in a visual format – see figure 1, below. The data logger utilises an app on a mobile phone and records the methane concentration measured by the Geotech TDL 500 every 4 seconds. It also geolocates it using the GPS functionality of the mobile phone. The Geotech TDL 500 and the relevant mobile phone were both carried by the same Environment Agency officer throughout the survey and so the two items were co-located at all times. The wind conditions throughout the survey were N/NNW, as indicated by the windsock on the adjacent Acumen Waste Services Ltd site, at level 5 on the Beaufort Scale – branches of moderate size move. The wind was blustery in nature. According to the BBC Weather App the atmospheric pressure was 1021mb.



**Figure 1** – banded and geolocated Geotech TDL 500 measurements overlaid on an aerial photograph of the site. Note the photograph is taken from the web-based software used in conjunction with the mobile application that logs the data and location. It does not show the state of the site at the time of the survey.

**2.3** Figure 1 shows the location of each data-logged reading and the relative methane concentration at each point by reference to colour coded bands, see key within figure 1. The key also records the number of individual readings within each colour coded band. The survey confirms that:

- The materials deposited in the inert landfill site are not currently degrading to produce gas.

*Officer notes during survey – Landfill, several transects walked around the edges of the deposits. No significant readings, all <10ppm. No odour detected.*

**Note** – *The officer making the notes was not the officer operating the Geotech TDL 500 equipment. On reviewing the logged data, one data point was recorded that was above 10ppm. This doesn't alter the conclusions drawn from this survey - the materials are not degrading to produce gas. This is what we would expect from an inert landfill site that is accepting suitable materials.*

**2.4** The same area was surveyed during a similar survey carried out on 23 June 2023. During the June 2023 survey data logging was not available but none of the areas surveyed showed any significant gas emissions. The results of the June 23 survey are presented in CAR Form 406424/0467153. The June 23 survey findings for these same areas were reported as:

*No gas odours were detected on this site. The only waste odour detected was a 'soil' type odour associated with the soils that have been deposited on this site. Both ambient and near surface readings on this site were at background levels, nothing greater than 2ppm detected.*

**2.5** The findings of both the June 2023 and November 2023 methane emissions surveys were similar. The emissions profile of the site has not changed in the period between the first and second survey. There are still no obvious sources of odour on this site.

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.

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.