

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

Site	Grange Landfill			Permit Ref	61563		
Operator/ Permit holder	Grange Landfill Limited						
Date	23/09/2022			Time in	11:00	Out	12:45
What parts of the permit were assessed	See below						
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge	
Recipient's name/position	Robert Couldwell						
Officer's name	Roy Thompson, Kelly Hudson			Date issued		26/09/2022	

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	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	A	
	2. Noise	A	
	3. Dust/fibres/particulates & litter	A	
	4. Pests, birds & scavengers	A	
	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	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).

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

Site visit arranged to review the extent of preparatory works currently being undertaken on site and the engineering works and timescales when these are likely to be completed.

This was an announced routine site inspection and carried out in the presence of Robert Couldwell, John Whyke (TCM) and Kelly Hudson.

No activities are being undertaken on site at this present time.

Had an initial discussion with Robert and John regarding surface water monitoring on site. Currently surface water monitoring is being undertaken on a quarterly basis, yet the permit requires that surface water monitoring from SW1 and SW2 is undertaken monthly in accordance with Condition 3.4.1 and Table S3.1 for the following parameters.

Table S3.1 Point source emissions to water (other than sewer) – emission limits and monitoring requirements

Monitoring Point Ref. /Description	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
SW1, SW2	Ammoniacal nitrogen Chloride Dissolved organic carbon Electrical conductivity Arsenic Cadmium Chromium Copper Lead Mercury Nickel Zinc Hardness Sulphate Total Suspended Solids	Monthly	Spot sample	As specified in Environment Agency Guidance LFTGN02 'Monitoring of Landfill Leachate, Groundwater and Surface Water' (February 2003), <u>risk assessments for your environmental permit (www.gov.uk)</u> or such other subsequent guidance as may be agreed in writing with the Environment Agency.

John states that he has been unable to obtain samples from SW2 as this is always dry. Advised John that if surface water channel is dry and therefore unable to obtain a sample, then this should be recorded and submitted along with other environmental monitoring data on a quarterly basis as agreed in accordance with Condition 4.2.3.

Also reminded Robert that in accordance with Condition 4.2.3 the monitoring data shall be submitted within 28 days of the reporting period ending.

Access route into the Cell 1 has now been completed and work on removing initial layer of topsoil has begun on the eastern section of the cell. Stockpiles on soils were noted within the cell and this was queried with John as to whether these soils were brought onto site as waste. John informs me these soils are the initial topsoil that has been scraped back prior to the access route in the cell being constructed. No wastes other than those materials used to construct the bund have been deposited within Cell 1.



John queried whether he could spread these soils initially within the cell, it was advised that these are not spread, as there is a requirement to remove initial vegetation and topsoil within the cell and therefore no benefit would be obtained from doing so.

Discussed the work taking place on stripping initial layer of topsoil within the cell. Advised that care be taken on the depth to which soils are to be removed so as not to affect the integrity of the in-situ geological barrier. Upon reviewing the trial pit logs, submitted in the Investigation & Validation of the Geological Barrier Report (No 15748/14) it is shown that initial depth of the topsoil in the area currently being stripped ranges from 0.20m to 0.30m.

Work was undertaken on extending BH01 through the engineered bund. This work was overseen by CQA Engineer and validation report will be submitted shortly showing its installation.



Surface water channels on the northern boundary of the site require clearing to ensure that flow is not impeded.



Noted that section of the surface water channel on the western boundary is in need of reprofiling, currently there is a low spot where surface water would accumulate which would impede flow towards the western attenuation pond.

Within the western attenuation pond, it was noted that there is only limited elevation between the crest of the outfall and the base of the pond, therefore, to minimise the risk of suspended solids flowing from the outfall, the base of the pond directly behind the outfall will be dredged.



Revised Geological Barrier CQA Plan has been submitted and this will be reviewed in due course.

As mentioned previously some form of secure compound will need to be replaced to minimise risk of damage to plant and equipment when site is unoccupied. Any change to current security proposal around the compound area as specified in Section 10.1 of the EMS will need to be formally approved.

To date no CQA Plan for BH05 installation has been submitted, if you seek approval to use previously agreed construction proposals for this installation, this will need to be formally agreed in writing. Reinstatement of BH05 needs to be overseen by CQA engineer.

You are reminded that replacement of the stock proof fencing on the eastern boundary of the site will be necessary before waste disposal activities commence.

The surface water infrastructure installed around the site still required to be CQA validated and assessed in accordance with Section 4 of the Surface Water Drainage Construction Proposals and CQA Programme agreed in accordance with pre-operational condition 3.

No mud was evident on haul road leading to main highway at the time of entering or leaving the site. During the inspection, there was no evidence of dust leaving the site.

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 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.

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.