



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	30/11/2022	Time in	11:00	Out	12:30
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 & Elsa Heppell	Date issued	05/12/2022		

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	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	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 whether any additional works have been undertaken on site since previous inspection on the 23/09/2022. No activities are being undertaken on site at this present time.

This was an announced routine site inspection and carried out in the presence of Robert Couldwell, Kelly Hudson and Elsa Heppell.

Robert gave us an update that activities will not be recommencing on site until next year, no firm proposals on the exact timescales when this will be, but will inform us prior to activities recommencing.

Confirmation that CQA Validation Report for the construction of the artificial geological barrier around Phase 2, Area 1 was received on the 23/11/2022. This will be reviewed in due course in accordance with Condition 2.5.5.

Robert confirmed that work on finalising the CQA Validation report for the surface water infrastructure installed around the site is almost complete and this is likely to be submitted very shortly.

Discussed with Robert whether surface water monitoring is being undertaken on a monthly basis as highlighted in my previous CAR. Robert confirmed that monthly surface water is now been undertaken in accordance with Condition 3.4.1 and Table S3.1. Robert clarified that obtaining samples from SW2 is difficult as this is always dry. As advised in my previous CAR, if surface water channel is dry and therefore you are unable to obtain a sample, then this should be recorded as so and submitted along with other environmental monitoring data.

No further work on removing initial layer of topsoil on the eastern section of Cell 1 has been carried out since my inspection. Due to the recent heavy rain over the past few weeks, surface water has accumulated within the base of Cell 1.

It is noted that top-soils placed along the outer flanks of the bunds has been eroded in places by recent heavy rain and that slippage has occurred in certain areas, particularly on the south-eastern flank of the intercell bund. These top-soils were placed as an interim measure primarily to meet with planning restrictions until final restoration is achieved. Work on replacing soils will take place once activities on site recommence.

Reminded Robert that surface water channel on the northern boundary of the site requires clearing to ensure that flow is not impeded. Flow is not currently impeded, but this may occur if further slippage of soils from the flank occurs.

Robert confirmed that once activities recommence on site, work on reprofiling the section of the surface water channel on the western boundary will be addressed. This will ensure flow is not impeded towards the western attenuation pond.

As highlighted in my previous CAR, the base of the western attenuation pond directly behind the outfall requires to be dredged to minimise the risk of suspended solids flowing from the outfall.

We still await submission of the CQA Validation report on extending BH01 through the engineered bund.

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.

Work to be completed prior to disposal activities commencing.

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, reminded Robert that 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. We require that BH05 be reinstalled prior to disposal activities commencing on site.

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

Previously agreed requirements.

For clarification purposes, details of approval for each of the pre-operational condition are listed below.

Table S1.4A Pre-operational measures	
Reference	Pre-operational
PO1	<p>Prior to commencement of waste deposit the operator shall install groundwater monitoring boreholes BH1, BH2, BH3 BH4 and BH5 at the locations agreed with the Agency and sample monthly for 3 months to characterise borehole specific baseline groundwater quality.</p> <p>The monitoring boreholes shall be installed to the depth and by methods and according to a design agreed in advance and in writing by the Environment Agency.</p> <p>The following details regarding the monitoring boreholes shall be provided to the Environment Agency within 3 months of installation:</p> <ul style="list-style-type: none"> (a) casings/linings (length, diameter, material, type of grout or filter media and whether slotted or plain); (b) depths and diameters of unlined sections; (c) standing groundwater levels; (d) details of strata encountered during drilling; (e) reference levels in metres above ordnance datum; (f) national grid references of the boreholes in the form AB 12345 67890; (g) any other information obtained from the boreholes relevant to the interpretation of water sample analysis. <p>The CQA validation Report for the installation of gas and groundwater monitoring wells was received on 22/03/17. It has been reviewed against the requirements in the corresponding CQA Plans and found to be adequate. See CAR 61563/0290350 dated 25/04/2017</p> <p>Prior to commencement of waste deposit compliance limits for ammoniacal nitrogen, cadmium, chromium, copper, lead and sulphate shall be derived, in accordance with H1 Technical Annex to Annex J: vs 2.0 April 2010 'Hydrogeological Risk Assessments for Landfills and the Derivation of Groundwater Control Levels and Compliance Limits', and applied to boreholes down hydraulic</p>

	<p>gradient boreholes BH3 and BH4.</p> <p>On the 19/12/18 submission in fulfilment of PO1 was received from Arley Consulting Group detailing proposed compliance limits for both BH03 & BH04. On the 01/05/19 email confirmation was sent from Roy Thompson in respect to the submission regarding pre-operational condition 1(PO1), confirming we have reviewed the report and are satisfied with the proposed groundwater control and compliance levels proposed for BH03 & BH04. Therefore, we are satisfied that pre-operational condition 1(PO1) has now been complied with.</p>
PO2	<p>Within 6 months of permit issue the operator shall install in-waste gas monitoring points in Phase 1 at a minimum frequency of 2 points per hectare.</p> <p>The CQA validation Report for the installation of gas and groundwater monitoring wells was received on 22/03/17. The CQA Report has been reviewed against the requirements in the corresponding CQA Plans and found to be adequate. See CAR 61563/0290350 dated 25/04/2017. Therefore, we are satisfied that pre-operational condition 2(PO2) has now been complied with.</p>
PO3	<p>Within 4 months of permit issue the operator shall detail the location, sizing and construction of the proposed surface water settlement lagoon and show its location on a site plan.</p> <p>Whilst the on-site surface water management drainage proposals specified within Report No 15784/11A, dated February 2019 are sufficient for satisfying pre-operational condition (PO3). The background to PO3 and the permit variation determination it resulted from did not include proposals for an under-waste culvert. The proposal to use an under-waste culvert, is an activity which is a fundamental change to the conceptual model on which the extant permit was determined and a change that requires a significant variation to the permit.</p> <p>The proposed under waste culvert was not a landfill component included within the permit variation application EPR/DB3803MN/V002 for the extant permit EPR/DB3803MN. The extant permit was determined using a scenario, as specified in the information supporting the permit variation application EPR/DB3803MN/V002, where:</p> <ul style="list-style-type: none"> • 'Water will be encouraged to drain towards this manhole chamber during the operation and post closure phases of site operations. During the operational phase water will be stored temporarily in a settlement lagoon before discharge to prevent excessive discharge of suspended solids.' • 'In addition, clean surface water may be intercepted on the upstream side of the site and diverted around active landfill areas.' <p>Consequently, the Environment Agency will need to give consideration as to whether the proposed under waste culvert and the overall proposed Storm Water Pollution Prevention plans are appropriate or not. Therefore, we require you in accordance with Section 3.4.16 of the Surface Water Drainage Construction Proposals - Report No 15784/11A, that prior to the construction of Cell 3a and Cell 3b that the Operator shall investigate the construction of the Drains A and B. Also commission a structural assessment to confirm whether these drains will withstand the addition loads imposed by the proposed landfill or whether further works are required, e.g. some protection and/or re-enforcement of the overlying.</p> <p>Prior to the construction of Cell 3a and Cell 3b, the operator will also need to apply for a variation of the permit, and support the application with new assessments such as, but not limited to: a new landfill stability risk assessment, a new H1 risk assessment; revised operating techniques including detail of monitoring, inspection and maintenance regimes that take the under waste culvert into consideration; and a surface water and suspended solids management scheme.</p>
PO4	<p>Prior to commencement of waste deposit compliance limits, to be applied to the discharge into the manhole at SW1, shall be proposed and agreed with the Environment Agency for ammoniacal nitrogen, cadmium, chromium, copper, lead, sulphate and Total Suspended Solids. The proposed limits shall be based on statistical evaluation of 3 months of monthly baseline surface water quality data.</p> <p>On the 19/12/18 submission in fulfilment of PO4 was received from Arley Consulting Group detailing proposed compliance limits for SW1. On the 01/05/19 email was sent from Roy Thompson requesting that proposed surface water compliance limits for SW01 be amended in line with our recommendations. On the 08/05/19 revised compliance limits were received from Arley Consulting Group, in line with our recommendations. Therefore, we are satisfied that pre-operational condition 4(PO4) has now been complied with.</p>

Following approval of pre-operation condition PO1 the agreed groundwater compliance limits for BH03 & BH04 are as follows –

Monitoring point reference	Parameter	Limit (including unit)	Reference Period	Monitoring frequency	Monitoring standard or method
Down hydraulic gradient groundwater monitoring points BH3 and BH4	Ammoniacal nitrogen	1.5mg/l	Spot Sample	Quarterly	As specified in Environment Agency Guidance LFTGN02 'Monitoring of Landfill Leachate, Groundwater and Surface Water' (February 2003), risk assessments for your environmental permit (www.gov.uk) , or such other subsequent guidance as may be agreed in writing with the Environment Agency.
	Cadmium	2.5 µg/l			
	Chromium	50 µg/l			
	Copper	10 µg/l			
	Lead	10 µg/l			
	Sulphate	[no limit]			

Following approval of pre-operation condition PO4 the agreed surface water compliance limits for SW1 are as follows –

Emission point Ref. & Location	Parameter	Source	Limit (incl unit)	Reference Period	Monitoring Frequency	Monitoring Standard or method
Discharge into manhole at SW1	Cadmium	Discharge from settlement lagoon	2.5 µg/l	Spot Sample	Monthly	As specified in Environment Agency Guidance LFTGN02 'Monitoring of Landfill Leachate, Groundwater and Surface Water' (February 2003), risk assessments for your environmental permit (www.gov.uk) , or such other subsequent guidance as may be agreed in writing with the Environment Agency.
	Chromium		50 µg/l			
	Copper		18 µg/l			
	Lead		25 µg/l			
	Sulphate		400 mg/l			

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.