

**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	23/06/2023			Time in	11:00	Out	12:10
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			Date issued		29/06/2023	

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
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 whether any additional works have taken place on site since my previous inspection on 31/03/2023.

This was an announced routine site inspection and carried out in the presence of Robert Couldwell, John Whyke (TCM) and Kelly Hudson. Weather conditions at time of inspection were warm and sunny, with a light westerly-south-westerly breeze.

Discussed with Robert and John what activities have been undertaken on site since our last visit. It was confirmed that the stockpiles of topsoil, both within Cell 1 and adjacent to Cell 1 have now been levelled out. These stockpiles were established when soils were pulled back from the area of Cell 1 prior to its construction to allow keying in of engineering.



Also aggregate has been placed on the inner flank of the western surface water attenuation pond to minimise any erosion of the flank adjacent to outlet, therefore minimising the risk of suspended soils blocking outfall.



Landfill gas, surface water and groundwater sampling is routinely undertaken on site.

Robert confirmed that additional information requested as part of the CQA Validation Report for the construction of the artificial geological barrier around Phase 2, Area 1, has now been collated and will be reviewed prior to submission to the Environment Agency.

Robert confirmed that there are no firm proposals on the exact timescales when activities on site will commence, but notification will be given prior to activities recommencing.

Noted as a result of the dry weather the topsoil's placed along the southern intercell bund, are suffering from surface cracking, some are quite substantial.



These cracks significantly weaken the soil structure and stability and may result in failure during period of prolonged heavy rainfall. Therefore, advised that flanks are routinely kept under review for signs of instability and if necessary, action taken to re-compact the area prior to the winter period. As indicated in my previous CAR (Report ID: 61563/0443406), these topsoil's were placed as an interim measure primarily to meet with planning restrictions until final restoration is achieved.

Reminded John 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.

No mud was evident on haul road leading to main highway at the time of entering or leaving the site.

As highlighted in my previous CAR (Report ID: 61563/0457081) issued on the 11 April 2023, the following aspects still need to be addressed.

Submission of information still required

CQA Validation report for the surface water infrastructure installed around the site.

CQA Validation report on extending BH01 through the engineered bund.

Clarification on additional work to be undertaken on site once activities recommence.

Work on reprofiling the section of the surface water channel on the western boundary will need to be addressed. This will ensure flow is not impeded towards the western attenuation pond.

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.

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.

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.