Environment Agency	**EPR Compliance Assessment Report**	Report ID: 404093/0446970

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

Site	Boultons Skip Hire			Permit Ref	EPR FB3202TF		
Operator/ Permit holder	BOULTON SKIP HIRE LIMITED						
Date	12/12/2022			Time in	15:19	Out	16:36
What parts of the permit were assessed	See below						
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge	
Recipient's name/position	Director and/or Secretary						
Officer's name	[redacted] and [redacted]			Date issued	09/01/2023		

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	N	
	2. Closure & decommissioning	NA	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	A	
	5. Plant and equipment	N	
c) General management	**1.** Staff competency/ training	A	
	2. Management system & operating procedures	A	
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	A	
d) Incident management	**1.** Site security	N	
	2. Accident, emergency & incident planning	A	
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	N	
g) Monitoring and records, maintenance and reporting	**1.** Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	A	
	3. Maintenance records	N	
	4. Reporting & notification	A	
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.

Permit Holder: Boulton Skip Hire Ltd
Permit Address: Boulton Skip Hire, Moorfields Industrial Estate, Stafford Road, Cotes Heath, Staffordshire, ST21 6QY
Permit: EAWML 404093 / EPR FB3203TF / Standard Rules SR2015 No6 75kte – household, commercial and industrial waste transfer station with treatment
EMS: Site Management Plan / Revision: BO001 / Issue Date: March 2017
FPP: Fire Prevention Plan / Version 1.1 / Issue Date: April 2017
WCL: CBDU119860 - Crossings Farm, Stone Road, Bramshall, Uttoxeter, ST14 8SH – expires 15.07.2025.

Boulton Skip Hire Ltd accepts a range of waste generated by both domestic and business skip hire from the Stoke-on-Trent region under permit EPR/ FB3203TF. Waste is collected on site, hand-sorted and sent to downstream sites for further processing.

Introduction

This Compliance Assessment Report (CAR) has been written following an announced site inspection at Boulton Skip Hire Ltd. It also includes an assessment of information provided by email following on from this site visit.

[redacted] and [redacted] (Environment Officers) met with [redacted] (Director), who hosted the site visit. Officers presented their personal authorisations.

The Technically Competent Manager, [redacted] of AC Environmental Consulting Ltd, was not present on site at the time of the inspection. [redacted] WAMITAB certification will expire on the 6th October 2024.
Weather on the day was cloudy, 4mph south-easterly winds and temperature in the region of -1 degrees Celsius. There was residual ice/snow on the ground.

Site Assessment

The main purpose of the visit was to review compliance with Environmental permit EPR/FB3203TF. The visit began with a site tour hosted by [redacted] travelling clockwise around the site from the tipping hall, and then concluded with viewing documents in the office.

The storage area was well organised and the concrete surface was clean with no visible spillages. It was noted that stretches of aco-drain across the site entrance were covered by metal plates due to damaged drain covers.

No dust emissions, odour or litter were found to be leaving the site and noise levels were reasonable.

Site inspections are undertaken weekly by [redacted] (Photograph A and Photograph B).

Waste Acceptance

[redacted] advised that at the time of booking, all customers are informed of the waste acceptance procedures and are provided with a leaflet to reiterate this information when the skip is delivered (Photograph C). Upon collection, all skips are visually inspected prior to accepting the waste. If non-confirming waste is identified at this stage, management will be informed, and customers will be asked to remove non-permitted waste. Another visual inspection takes place once the skip has arrived at site and inspected fully when the skips are tipped in the tipping hall. Depending on the nature and volume of any non-permitted wastes, they are either sent back to the customer or placed in the quarantine container. During the visit two 25 litre creosote containers were present in the quarantine container (Photograph D).

Although not included in the information leaflet, customers are also advised at the time of booking that plasterboard can be present at <10% of the skip's capacity, or if a larger volume is anticipated Boulton Skip Hire Ltd will supply a tonne bag. If it is found that a customer has put more than 10% of plasterboard, Boulton Skip Hire Ltd will invoice the customer.

It should be noted that if Boulton Skip Hire Ltd wish to return non-permitted wastes to the customer after the waste has been accepted onto site and treatment has begun, the same duty of care requirements are required as when sending waste to a downstream facility. Boulton Skip Hire Ltd should ensure the receiving customer is permitted to receive the waste and should ensure the waste is accompanied by with a Waste Transfer Note or Consignment Note.

Waste storage

At the time of the visit there were 5 skips containing waste in the storage area waiting to be tipped (Photograph E). One skip is tipped in the tipping hall at a time and then sorted by hand into waste fractions, including but not limited to, wiring, paper, cardboard, metal, general, plasterboard and wood (Photographs F, Photographs G, Photographs H & Photographs I). All waste was stored inside the building or within a secure container, except for soil and stone and hardcore, as allowable within the permit.

There were two skips containing waste tyres. [redacted] advised that a business decision had recently been made to no longer accept tyres onto site and all tyres would be removed in early 2023. New and reconditioned tyres for the skip lorries were also stored near to the waste tyre skips.

The boundary wall of the site is utilised as the push wall for the hardcore pile, soil and stone pile and rear of the tipping hall. The walls appeared to have no visible damage as viewed from within the site and are regularly checked by [redacted] during the weekly site inspection; it is advised that the structural integrity of the boundary wall should be considered and reviewed regularly.

Site Notice Board / Use of the Environment Agency's Logo

The notice board displaying the permit holders name, permit number and emergency contact details was viewed on the site gates (Photograph J). It was noted that the Environment Agency's logo is also shown on the site notice board. As a government regulator we cannot be seen to endorse any particular product or service. As such we are unable to allow the use of our logo.

As an alternative to using our logo, if your company is registered or licensed by the Environment Agency, you may state that fact and quote your registration number in any publicity, for example "Registered with the Environment Agency."

ACTION: Remove the Environment Agency's logo from the site's notice board within 30 days.

Please confirm to me via email when this has been completed; if it has not, further action may be taken.

Waste Transfer Notes

A selection of Waste Transfer Notes (ticket numbers 2384, 002571, 003985, 3075, 3515 and 3058) for hardcore, general, wood, soil and plastic waste leaving site were viewed and found to be

insufficient as they did not include all of the required information required by Regulation 35 of The Waste (England and Wales) Regulations 2011 (see Directly Applicable Legislation section below for further information).

It is noted that hazardous waste should be transported accompanied by a Hazardous Waste Consignment Note. Waste containing Persistent Organic Pollutants (POPs), such as Waste Electrical and Electronic Equipment (WEEE) and upholstery, should also be treated as hazardous waste. Advice and guidance provided below.

Waste Returns
Prior to the site visit, the quarterly waste returns supplied to the Environment Agency by Boulton Skip Hire Ltd were reviewed. It was noted that in returns provided for Quarter 1 2022, Quarter 2 2022 and Quarter 3 2022, there was significantly more waste being received onto site than is being removed; suggesting that there would be 3152.95tonnes of waste being stored on site at the end of September 2022 (data provided in Photograph K).

It was clear during the site visit that there was not 3152tonnes of waste being stored on site. [redacted] advised that the discrepancy was due to there being no weighbridge onsite. The received tonnages are based on conversation tables provided by AC Environmental Consulting Ltd for each waste type, for example a general waste, 8 cubic meter skip is estimated at 5-6tonnes. Previously, some wastes from site were taken to sites which could provide exact tonnages. Since October 2022, the site had a change of downstream facility and all wastes leaving site are now be taken to a site that can provide exact tonnages.

It was advised that the change of downstream facility in October 2022 may affect the tonnages declared on future quarterly returns and it was agreed with [redacted] that the quarterly returns will be reviewed again once the operational changes have taken effect.

Advice and Guidance

Environmental Management System (EMS)
The document 'Site Management Plan' (Revision: BO001 / Issue Date: March 2017) was provided prior to the visit and reviewed. It became clear during the inspection that the business and waste operations on site have evolved. Environment Agency Management System guidance (see below) states that *'you must review and update your management system when you make changes to your site, operations or equipment that affect the activities covered by your permit'*. You must review the document to ensure it reflects the current operations on site. This was discussed with [redacted] during the visit.
ACTION: Please review the Environmental Management System document 'Site Management Plan' (Revision: BO001 / Issue Date: March 2017), with focus on site layout plan and plasterboard acceptance procedures, in line with the Environment Agency Management System guidance which can be found using the link below:
https://www.gov.uk/guidance/develop-a-management-system-environmental-permits
Please email the updated document to [redacted] by the deadline.

Deadline: 28th February 2023

Please note that the management system has not been officially approved or audited. You must ensure it complies with the Environment Agency guidance and effectively identifies and minimises the risks of pollution to ensure it is compliant with the permit condition.

Fire Prevention Plan (FPP)
Permit condition 2.3.1 requires that waste activities on site are managed and operated in accordance with Fire Prevention Plan approved by the Environment Agency. During the site visit it was identified that key equipment to contain contaminated run off was not present on site as

required by the approved FPP (Fire Prevention Plan / Version 1.1 / Issue Date: April 2017). This was discussed with [redacted] during the visit and agreed that action was required.

ACTIONS: Ensure waste operations are managed and operated in accordance with the approved Fire Prevention Plan (Version 1.1 / Issue Date: April 2017).

Deadline: 28th February 2023

Please note: if you feel your Operations no longer align with your approved Fire Prevention Plan and you wish to change it, then you can resubmit an updated Fire Prevention Plan for approval to the Environment Agency. However, until the updated version has been approved, you must continue working to your current approved plan.

**** Please note that Fire Prevention Plan assessments are rechargeable in accordance with paragraph 14 (1) of the Environment Agency (Environmental Permitting) (England) Charging scheme 2018****

Please note: the above issues have not been scored on this occasion, and advice and guidance has instead been provided. However, should you not meet the deadlines given, this does not preclude us from issuing these breaches as non-compliances going forward and further action may be taken to ensure compliance with the permit conditions should the deadlines not be met.

Persistent Organic Pollutants (POPs)
POPs are chemical substances that do not break down in the environment. They are a danger to human health and the environment. You are responsible under your duty of care to know if your waste material contains POPs, they are commonly found in waste upholstered domestic seating and waste electrical and electronic equipment (WEEE), but can be found in many other items.

You must take all reasonable steps to avoid mixing POPs waste with other waste during storage, collection and treatment. If you do mix, you must manage the whole load as POPs waste.

You must provide an accurate description of your waste as part of your duty of care and include 'POPs' in the description where they are present.

Information on how to identify and describe POPs can be found using the following links:
https://www.gov.uk/guidance/identify-and-classify-waste-containing-persistent-organic-pollutants-pops

https://www.gov.uk/guidance/manage-waste-upholstered-domestic-seating-containing-pops

https://www.gov.uk/guidance/classify-some-waste-electrical-devices-components-and-wastes-from-their-treatment

Total Non-compliance score

Your total non-compliance score this inspection is 0 CCS points. This currently makes you a Band A operator (0 CCS points). If you remain a Band A operator for the remainder of this compliance year, your 2023 fee will be 95% of the baseline subsistence charge.

https://www.gov.uk/government/publications/assessing-and-scoring-environmental-permit-compliance/assessing-and-scoring-environmental-permit-compliance

Directly applicable legislation

Duty of Care
All waste transfer notes are required to contain the following information:

- The appropriate List of Wastes/EWC code;
- An accurate written description of the waste;
- The quantity/weight, nature and manner of containment of the waste;
- The time and place of transfer;
- SIC code of holder of the transferor (if relevant);
- The name, address and signature of the transferor (producer/holder);
- The name, address and signature of the transferee (carrier/receiver);
- A statement that the transferor is the producer/importer/transporter of the waste, or a local authority, or the holder of an environmental permit including permit number, or the operator of an exempt facility, or a registered carrier of waste including carrier registration number, or a dealer or broker of waste including the registration number;
- A statement that the transferee is the producer/importer/transporter of the waste, or a local authority, or the holder of an environmental permit including permit number, or the operator of an exempt facility, or a registered carrier of waste including carrier registration number, or a dealer or broker of waste including the registration number;
- Confirmation that the transferor (producer/holder) has discharged its duty in relation to the waste hierarchy.

Guidance on waste transfer notes can be found here:
https://www.gov.uk/government/publications/duty-of-care-waste-transfer-note-template

Further guidance on your responsibilities in relation to Duty of Care under the Environment Protection Act 1990 can be found within the Waste Duty of Care Code of Practice:
https://www.gov.uk/government/publications/waste-duty-of-care-code-of-practice

Consignment Note guidance
When hazardous waste is moved it must be accompanied by correctly completed paperwork called a consignment note. The note must be prepared before it's moved.

A note is needed for all movements of hazardous waste, including:

- collections from businesses by registered waste carriers;
- movements from one premises to another within the same business;
- movements from customer premises, where another business has produced waste.

Consignment Note guidance and a Hazardous Waste Consignment Note template which can be used by businesses can be found using the links below:

https://www.gov.uk/guidance/hazardous-waste-consignment-note-supplementary-guidance#:~:text=on%20hazardous%20waste.-,When%20consignment%20notes%20are%20needed,businesses%20by%20registered%20waste%20carriers

https://www.gov.uk/dispose-hazardous-waste/consignment-notes

https://www.gov.uk/government/publications/hazardous-waste-consignment-note

Enforcement Response

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.

Concluding Comments

There were many aspects of site operations that were not assessed during this inspection. It is important that you carry out your own audits/inspections/reviews to ensure compliance with the permit at all times. You should also keep records of these audits/inspections/reviews and make them available for inspection on request.

Please be aware that other parts of the permit could be assessed in the future.

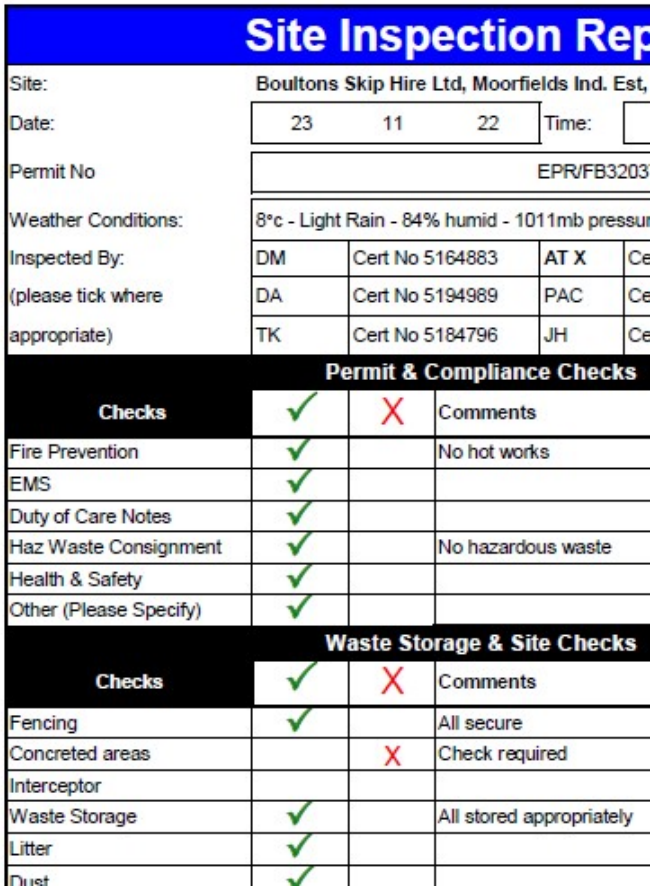
Waste Enquiries Helpdesk

For any queries or advice on this Compliance Assessment Report please contact [redacted]@environment-agency.gov.uk. For general queries and advice relating to regulatory issues please contact the National Customer Contact Centre - 03708 506 506 - enquiries@environment-agency.gov.uk.

Environment Agency incident hotline: 0800 80 70 60

Photographs

Photograph A

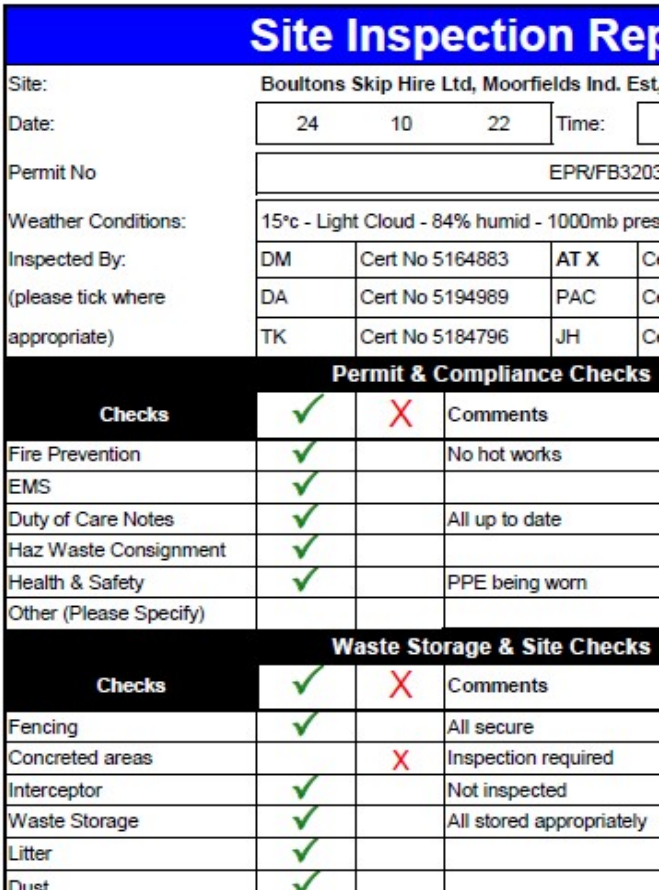


Site Inspection Rep				
Site:	Boultons Skip Hire Ltd, Moorfields Ind. Est,			
Date:	23	11	22	Time:
Permit No	EPR/FB3203			
Weather Conditions:	8°c - Light Rain - 84% humid - 1011mb pressu			
Inspected By:	DM	Cert No 5164883	AT X	Ce
(please tick where	DA	Cert No 5194989	PAC	Ce
appropriate)	TK	Cert No 5184796	JH	Ce

Permit & Compliance Checks			
Checks	✓	X	Comments
Fire Prevention	✓		No hot works
EMS	✓		
Duty of Care Notes	✓		
Haz Waste Consignment	✓		No hazardous waste
Health & Safety	✓		
Other (Please Specify)	✓		

Waste Storage & Site Checks			
Checks	✓	X	Comments
Fencing	✓		All secure
Concreted areas		X	Check required
Interceptor			
Waste Storage	✓		All stored appropriately
Litter	✓		
Dust	✓		

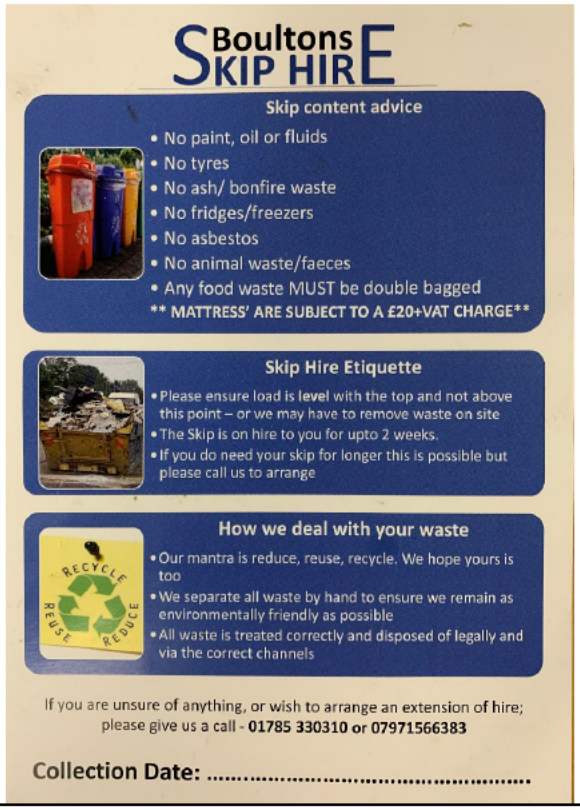
Photograph B



Site Inspection Rep				
Site:	Boultons Skip Hire Ltd, Moorfields Ind. Est,			
Date:	24	10	22	Time:
Permit No	EPR/FB3203			
Weather Conditions:	15°c - Light Cloud - 84% humid - 1000mb pres			
Inspected By:	DM	Cert No 5164883	AT X	C
(please tick where	DA	Cert No 5194989	PAC	C
appropriate)	TK	Cert No 5184796	JH	C

Permit & Compliance Checks			
Checks	✓	X	Comments
Fire Prevention	✓		No hot works
EMS	✓		
Duty of Care Notes	✓		All up to date
Haz Waste Consignment	✓		
Health & Safety	✓		PPE being worn
Other (Please Specify)			

Waste Storage & Site Checks			
Checks	✓	X	Comments
Fencing	✓		All secure
Concreted areas		X	Inspection required
Interceptor	✓		Not inspected
Waste Storage	✓		All stored appropriately
Litter	✓		
Dust	✓		

Photograph C	Photograph D
	
Photograph E	Photograph F
	

Photograph G



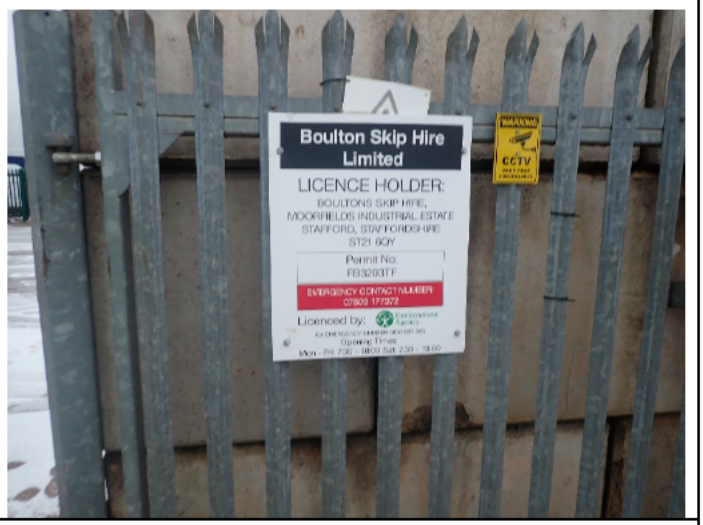
Photograph H



Photograph I



Photograph J



Photograph K

	Received (Tonnes)	Removed (Tonn
Quarter 1 2022	2229	724
Quarter 2 2022	2070	854.49
Quarter 3 2022	2358	831.56

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.