



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

Site	Emerald Biogas Energy Park EA/EPR/BP3133TC/A001			Permit Ref	BP3133TC		
Operator/ Permit holder	WARRENS EMERALD BIOGAS LTD						
Date	27/08/2026			Time in	12:30	Out	15:45
What parts of the permit were assessed	General site inspection and odour tour						
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge	
Recipient's name/position	Site Manager						
Officer's name	Brian Raun, Nathan Reed			Date issued		07/09/2026	

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 2) and the Actions (section 4). 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	A	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	A	
	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	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.

Emerald Biogas EPR/BP3133TC site visit and inspection 27/08/2026.

Previous CAR form actions.

Action 01/0593446: The operator advised they have engaged with a supplier of a standalone drum-based abatement units which can be attached to the tanker during loading of digestate and abate the vented air. The operator has committed to keeping the Environment Agency updated of developments. The operator is requested to have this system implement at the earliest opportunity and certainly by the action deadline or provide reasonable explanation and further updates to any delay. **Deadline: 26/05/2026.**

Operator response - I can confirm we have discussed this internally, and we are currently finalizing adapting a bespoke container for the tankers vent. The aim is to force the displaced air through water (similar principle as a wet scrubber). This is expected to work as a short-term solution. We are still discussing the details of a standalone drum as a medium/long term solution.

Regulator comments - The operator has procured and implemented the carbon abatement drums originally proposed. During the site visit, EA officers observed the abatement system in operation. A new drum had been connected to the loading system, and no odour was detected at any stage of the loading process. This was the second drum to be used, with the first having remained effective for approximately 10 weeks. The operator has confirmed their intention to replace the abatement drums every two months to ensure they are changed before becoming saturated and to maintain effective odour control.

This action is now considered **complete and can be closed**. However, it is acknowledged that further development work, as outlined in the recommendation below, will still be required.

Recommendation 01/0606491 –

- Continue to gather operational data to better understand the number of loads that can be processed and the duration for which the carbon abatement drums remain effective before reaching saturation.
- Integrate the carbon abatement drums into the site's management systems, operating procedures, and training matrix, and ensure they are included within the revised Odour Management Plan.
- Concerns remain regarding the current requirement for an engineer to replace the drums, together with the lack of appropriate equipment in the area to facilitate this task. The operator's proposal to replace the drums on a planned two-monthly schedule may mitigate this issue. This approach should be clearly documented within relevant procedures, management system documentation, and maintenance schedules.

Action 02/0593446: Ensure all areas to which food waste could be deposited are cleaned and maintained to prevent further environmental risk from odour, pests, and the escape of waste.

Operator response - we have increased the housekeeping standards across the site; the reception building will be thoroughly jet washed in combination with the installation of the shedding plates inside. I am waiting for costs to install a rat trap umbilical cord around the reception building until the area is cleaned.

Regulator comments - The new reception hall was inspected during the visit. Waste volumes were relatively low at the time due to the ongoing installation of the shedding plates. It was observed that the walls of the reception hall would benefit from more frequent deep cleaning, as there was evidence of a build-up of contamination.

Recommendation 02/0606491 – The operator should review the reception hall cleaning regime to ensure that periodic deep cleaning is undertaken, including the cleaning of all internal wall surfaces within the reception hall.

Action closed and complete.

Action 03/0593446: Submit a schedule of improvements to be made to the new reception hall to prevent waste accumulating on and behind the push walls or advise of a new date and the reason for the delay. **Deadline:**

23/03/2026.

Operator response - *I can confirm CAPEX has now been approved for the revised shedding plates that are going in. The supplier has also been set up in our software (this morning). Next steps are to raise a PO (latest tomorrow) and I expect given the priority of the project, for it to be approved within 5 working days. Next steps will include confirm leading times of the shedding plates (previously it was 4 to 5 weeks from ordering). The plates will cover the gap between the cladding and the push wall completely; this will be done in a slope so all potential material reaching it will be directed back to the reception floor.*

The installation is not straight forward given the shed must be maintained operational during the installation, the shed will be sectioned (with HACCP control points) and effectively quarantined in phases to allow throughout clean up followed immediately by the plate fittings. Extra mounting plates might be required to ensure the sliding plates are secure and installation durable. Previously we estimated the project could take 5 to 6 weeks to be completed – I will get confirmation by next week.

Regulator comments – Installation of the shedding plates is progressing well and is expected to be completed within the next few weeks. This action is considered **complete and can therefore be closed**. The completed works will be inspected and verified during a future site visit.

Recommendation 03/0606491 – The operator should incorporate appropriately scheduled inspections and maintenance of the shedding plates into the site's engineering and maintenance management system to ensure their ongoing effectiveness and integrity.

Action 04/0593446: Follow your housekeeping and hygiene procedure (document no. EB-0515) in your integrated management system and update, if necessary, with interim mitigation procedures. **Deadline: 27/02/2026.**

Operator response - *I can confirm the housekeeping and hygiene procedure (document no. EB-0515) has been reviewed and updated. We have requested the site supervisors to roll this out to the operators. We have allowed a month until all operators are trained on the updated procedure. I will provide an update on these by next week.*

Regulator comments - Litter was observed across parts of the site during the inspection. The operator is reminded of the requirement to ensure that the housekeeping and hygiene procedure is fully implemented and always maintained to prevent waste escape and maintain appropriate site standards. Given the need to assess the effectiveness of the measures over a longer period, this action will remain open for ongoing review. The completion date has therefore been extended to **31/12/2026**, at which point compliance and the effectiveness of the site's housekeeping arrangements will be reviewed prior to consideration of close-out.

Introduction.

Odour tour.

An odour tour of the surrounding area was undertaken ahead of the site visit.

Location 1 – W3W valve.spoken.cats. Weather – Temperature 20 degrees C, Wind intermittently blowing at 9mph gusting to maximum 19mph ENE. 100% cloud cover. Observation made between 10:50 and 10:55, no odour detected.

Note: the new and old reception hall doors were observed to be closed.

Location 2 – W3W because.forge.embers. Weather conditions unchanged from location 1. Observation made between 11:02 and 11:07, no odour detected.

Location 3 – W3W confident.boards.jeep. Weather conditions unchanged from location 1. Observation made between 11:09 and 11:14, no odour detected.

Location 4 – W3W award.supported.strain. Weather conditions unchanged from location 1. Observation made between 11:22 and 11:27. 30 second detection of odour around 11:23. Odour was mild non-descript chemical/burning type odour at an intensity of 2 out of 6 and was transient. The odour detected was not consistent with the type of odour typically associated with emissions from Emerald Biogas.

Location 5 – Emerald car park. Weather conditions unchanged from location 1. Observation made between 12:25 and 12:30. An intermittent odour was detected at an intensity of 2 out of 6. Note: no digestate loading operations were taking place during the monitoring period.

Site inspection.

This was a pre-arranged site visit undertaken to conduct a site inspection assessing infrastructure, amenity, management systems, operations, other relevant aspects of the permit, and progress against the actions identified above. Officers presented their warrant cards at the commencement of the visit.

EA – Installations and Waste Regulatory Specialist Officers

Emerald Biogas – Site Manager, EHS advisor.

Discussions.

Discussions were held regarding the number, nature, and locations of odour reports received by the Environment Agency (EA). Consideration was given to the validity of certain reports, particularly where prevailing wind conditions and

the distance between the complainant and the site indicated that the site was unlikely to have been the source of the reported odour.

The operator discussed the management of the carbon filters and confirmed that the filter media is replaced on a six-monthly basis.

The operator confirmed that Leak Detection and Repair (LDAR) surveys are undertaken every six months. The operator was reminded of the permit requirement to submit an annual LDAR report to the Environment Agency for review. The operator agreed to provide the two most recent LDAR reports for review.

The permit contains several improvement and pre-operational conditions. While submissions relating to these conditions have previously been made by the operator, there is no evidence to indicate that they have been reviewed or formally responded to by the EA. It was agreed that the EA would share the historic submissions with the operator to enable confirmation that the information remains valid prior to review. EA officers advised that the review of these submissions would be undertaken on a time-and-materials basis and would therefore be chargeable.

Site tour.

A1 – Activities specified by the permit.

The activities being undertaken at the site are consistent with those authorised by the permit and are being carried out within the permitted site boundary.

B1 – Engineering for the prevention and control of pollution.

The abatement systems appeared to be operational, appropriately maintained, and functioning effectively. Advice was given around potential improvements the operator may wish to explore such as biofilters and chemical scrubbers. It was made clear this was advice and guidance for consideration only, and that any assessments and decisions remain the responsibility of the operator.

B3 – Site drainage engineering (clean & foul).

The site drainage system appeared to be adequately maintained, with no obvious blockages, damage, or defects observed that would be likely to compromise its performance or result in localised flooding.

B5 – Plant and equipment.

Plant and equipment observed during the inspection appeared operational and maintained to an acceptable standard.

C3 – Materials acceptance.

Materials received and handled on site appeared to comply with the waste types authorised by the permit.

C4 – Storage, handling, labelling, segregation.

Materials were observed to be stored appropriately. The operator was reminded that labels should be applied to all movable containers before materials are placed within them, to ensure clear identification and effective management.

D1 – Site security.

Where observed, the site boundary fencing appeared to be well maintained and in good repair.

D2 – Accident, emergency & incident planning.

Spill kits were observed in appropriate locations throughout the site. However, the contents of the kits and the rationale for their provision were not evaluated during the inspection.

F1 – Odour

Minor odours were detected at limited locations during the site inspection; however, these were not considered likely to result in off-site impacts beyond the site boundary. The abatement system exhaust stack was identified as a potential source of the observed odour. The operator confirmed that emissions from this stack are not currently monitored through a live monitoring system, such as SCADA. The operator was advised that implementing such monitoring may be beneficial and should be considered.

F2 – Noise.

Noise generated by site activities was limited and consistent with normal operations. No noise was detected at levels that would be expected to extend beyond the site boundary.

F3 – Dust/fibres/particulates & litter.

Small amounts of litter were observed in areas outside the reception halls, particularly on the unmade ground located between the old and new reception halls. The operator was advised to address this issue. Action 04/0593446 will remain open pending demonstration of sustained improvement and effective site housekeeping measures.

F4 – Pest, birds & scavengers.

No significant evidence of pest activity, bird infestation, or scavenging animals was identified during the site inspection.

Additional inspection comments.

- Minor damage was observed to one of the doors of the new reception hall. The operator advised that replacement parts have been ordered and are expected to be delivered on or around 10 September.
- Minor damage was also identified to a wall panel within the new reception hall. The operator advised that repairs will be undertaken when contractors carrying out work on the shedding plates reach that section of the building, which is anticipated to be within approximately two weeks.
- The operator reported that gas is currently being flared at a higher rate than desired and that operations are approaching the site's 10% flaring limit. Discussions were held regarding the sizing and number of gas engines available on site.
- The operator stated that calculations have been completed to demonstrate that all secondary containment systems on site comply with the relevant 110% and 25% capacity requirements. This was not assessed further during the inspection.
- The operator further stated that primary containment vessels are inspected and maintained in accordance with appropriate standards. This was not assessed further during the inspection.
- The site pond was inspected, with the operator confirming that it is used solely for the storage of surface water.
- The operator was challenged regarding an unsecured access opening to a vessel following maintenance and inspection activities. The operator was reminded that access points to confined spaces should be secured as soon as practicable following the completion of any works.
- Discussions were held regarding the de-gritting of digesters. The operator confirmed that Digester 2 has recently been de-gritted and that plans are in place to undertake similar works on the remaining digesters.

Non-compliances.

There are no non-compliances for this report.

Total non-compliance score.

The total non-compliance score for this inspection is **0 CCS** points. The total CCS score for the year (2026) to date is **8**, which makes you a **Band B** operator and means that your subsistence fee is currently **100%** of the charge for 2027.

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.

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?

If a permit holder disagrees with the CAR form, they should raise their concerns to the officer or team which issued the form. This must be done within 14 calendar days of receipt. If the response does not resolve the issue, a permit holder can request an appeal of the regulatory decision. This request must be made within 28 calendar days of receipt of the response. More details on our regulatory appeals process can be found at

<https://www.gov.uk/guidance/appeal-a-regulatory-decision-from-the-environment-agency>.

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.