

**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	06/02/2024				Time in	10:25	Out	13:00
What parts of the permit were assessed	As per below:							
Assessment	Procedure review	EPR Activity:	Installation	X	Waste Op	Water Discharge		
Recipient's name/position	Site manager/ TCM							
Officer's name	James Waddington, Paul Whitehill, Sam Hantoosh, Sophie Siddle				Date issued		17/06/2024	

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)	N		
	4. Containment of stored materials	N		
	5. Plant and equipment	N		
c) General management	1. Staff competency/ training	N		
	2. Management system & operating procedures	A		
	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	N		
	2. Noise	N		
	3. Dust/fibres/particulates & litter	N		
	4. Pests, birds & scavengers	N		
	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.

Introduction:

Warrens Emerald Biogas Limited is an Anaerobic Digestion facility which operates under a consolidated permit EPR/BP3133TC. The address of the facility is Emerald Biogas Energy Park, Hurworth Road, Aycliffe Industrial Estate, Newton Aycliffe, County Durham, DL5 6UD and is also company's registered office address.

The purpose of the visit was to discuss odour reports and to review the sites odour control systems in accordance with BAT. To assess compliance the issued permit was used and the approved Odour Management Plan (dated Aug 2023). Senior odour specialist advisors from the EA supported the inspection to observe measures and to provide advice and guidance were necessary.

On arrival EA officers signed in and showed a personal authorisations to the site manager and the purpose of the visit explained. Prior to the on-site inspection a meeting was held in the site office.

This compliance report is a summary of the visit only and any areas of concern or improvement identified by the EA will be highlighted and further discussed with the operator following the issue of the report.

During the visit to the site, odour was detected at multiple locations within the site boundary. It is evident that the site has the potential to generate odours during the processing of odorous materials. These odours can originate from various sources, including the loading of materials into and from storage tanks, different stages of processing such as pasteurisation, acidification, digestion, filtration, and centrifugal separation. Additionally, odours may escape through leakages from tank vents, doors opening in building, and materials stored in open skips at the site's open yards. Furthermore, odours can emanate from outlet vents of the site's abatement systems.

The operation is an anaerobic digestion facility at Newton Aycliffe in County Durham. The installation will treat up to 150,000 tonnes per annum of source segregated biodegradable wastes (food waste, liquid fat and oils, animal by-products) and non-wastes (grass silage).

The facility consists of a waste reception area for delivery of all feedstocks except for grass silage which will be off-loaded to enclosed containers outside of the main raw material reception building. Manure/ sludge materials are directly uploaded into the pulp collection tanks. Unwanted materials will be removed from the feedstock prior to transfer of material to the pasteurising tanks. Pasteurised material is then transferred to four digester tanks in which digestate, and biogas is produced. The digestate is sent off-site for use as a fertiliser. The biogas is subject to a cleaning process via two upgrading plant to create a biomethane. The biomethane is then exported offsite to the gas National Grid. The installation also uses the biogas produced to provide energy to the facility via the combustion of biogas within two combined heat and power (CHP) engines. Each engine is classed as a medium combustion plant (MCP), with a thermal input of 3.9 MWth and 2.9 MWth respectively.

During the site visit officers were shown the reception hall, storage tanks, digesters, odour abatement systems, lagoon, de-grit process and biogas management systems. Below is a summary of the visit and advice and guidance. A separate detailed site visit report has been completed by the visiting odour specialist and should be read in conjunction with this report.

Compliance summary:

B1. Engineering for the prevention and control of emissions:

Site Reception building:

Within this building, all accepted waste materials including food wastes are deposited at the rear in a large concrete bay, while the pre-treatment process occurs on the left side close to the reception hall door. This involves the removal of plastic bags and other packaging materials before shredding the mixed waste. The shredded materials are then pumped into storage tank 1 (pulp tank1) to be mixed with waste liquid, forming soup materials which are subsequently pumped into one of the pasteurisation tanks.

Within the management systems the operator asserts that the building maintains negative pressure, facilitated by an air extraction system located above the tipping area. This system is allegedly robust enough to sustain a slight negative pressure within the building, achieving 2 air changes per hour. However, upon inspection, it was observed that the grill points of the air extraction system were clogged with dust and dirt, reducing the ability for the system to effectively perform air exchanges and in extracting building air emissions, as shown in the photos below. It is evident that a robust maintenance schedule is not in place or is not being followed to avoid this level of dust and dirt.



Additionally, within the tipping area, closest to the reception door, officers observed a pond of green liquid seeping from tipped waste and pooling at the drainage channel. The pooling of this liquid poses an increased risk of odour emissions occurring.



These emissions could potentially escape outside the building through openings in the doors. Although the doors were closed during the inspection, they were not securely shut, leaving a 5cm gap at the bottom.



Furthermore, the air extraction system does not cover the pre-treatment process area, meaning that any odour emissions from this process may escape through the open-door areas.

It should be noted that at the time of inspection a new reception hall was under construction. It is understood that this building will utilise the already installed abatement system.

Ventilation in enclosed buildings should serve multiple purposes, including preventing the accumulation of odorous emissions, minimising odour escape, reducing corrosion risks, and ensuring a safe working environment for employees. For the building's ventilation system to be effective, it must be meticulously designed, taking into account factors such as occupant requirements, heat release, and the volume of emissions generated. This necessitates appropriately sizing supply points (louvers) and determining the volume of contaminated air to be extracted. Additionally, efforts should be directed towards enhancing air quality within the main facility by implementing localised extraction systems for odorous sources such as the tipping area and pre-treatment/packaging shredding processes. Continuous monitoring of the air extraction system's flow rate and pressure via a SCADA system is essential to ensure optimal performance.

Concrete and other semi-porous surfaces in the new building should be sealed to prevent the absorption of odorous residues. A drainage system within the building should be considered to manage leachate or dirty water resulting from building activities, with screens or mesh utilised to remove solid particulates from the water. Drainage plans should be updated to reflect the management of leachate and or dirty water.

The current reception hall does not benefit from fast-acting roller doors and the staff access door was noted as being partially open and not fully sealed when closed at the time of the visit. It is crucial to implement a proper door-opening policy, utilising one door at a time and employing fast-acting roller shutter doors for areas with negative aeration. It is understood that the new reception hall will benefit from fast-acting doors.

It was observed that within the reception hall there were areas that would benefit from a deep clean and improved housekeeping. Without the benefit of a deep clean, areas of the reception building including, drainage channels, de-packing plant and bays will increase the risk of odours.



Concurrently, the site should enhance current building housekeeping practices, including implementing a regular cleaning schedule for equipment, workspaces, and surrounding areas. Immediate clearing and cleaning of all dirty water should be ensured, along with prompt cleaning of the air extraction system both internally and externally to maintain effective ventilation and odour control.

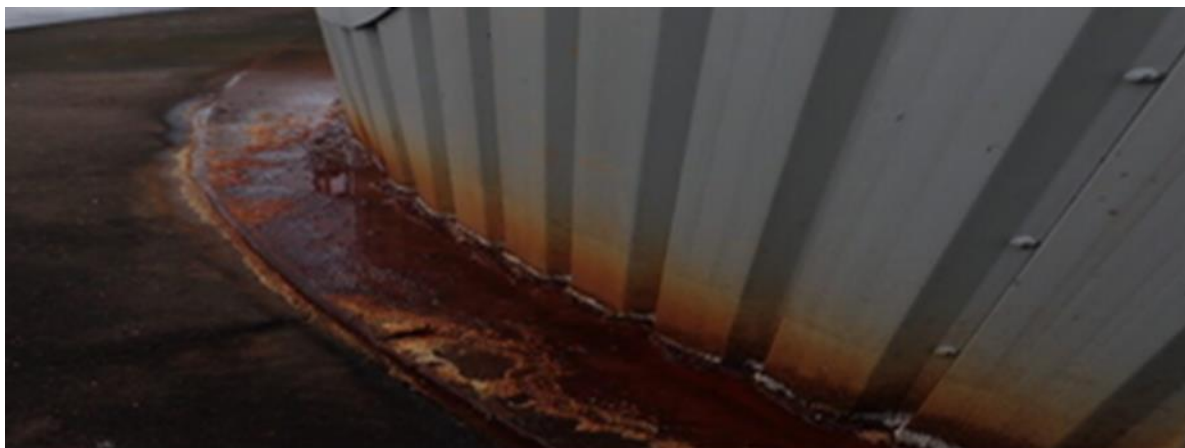
During the visit, it was observed that tanks within the bunded area were surrounded by ponds of water, characterised by a green/ brown hue as shown in the below photo. This discoloration suggests that the water is not pure rainwater but likely contains spills of effluent, sludge, or overflow from storage tanks. At the time of inspection, a pump for the effluent water tank had been blocked causing a release of dirty effluent into the bund. Measures were underway to remove the dirty effluent from within the bund back into the tanks.



The bunded area surrounding the site tanks must be equipped with an efficient drainage system to promptly collect any dirty water or spills resulting from site activities. It is imperative to ensure that this area is consistently maintained, always keeping it clean and dry.

In the absence of an efficient drainage system within the tank bunding areas to manage pooling leachate or dirty water generated from site activities, alternative measures may be necessary.

Officers also observed that the base of the post digestate storage tank appeared corroded, with red liquid leaching from it as shown in the below photo. It is unclear whether this corrosion originated from the outer layer of the tank or from within. An urgent investigation is necessary to confirm the integrity of the tank structure.



C2. Management systems & operating procedures:

During the inspection the operator showed officers a clay lined lagoon which is used for the collection of clean surface water from the site drainage system. Water from the lagoon is pumped back into the plant to be used in the treatment process. An effluent storage tank is used for dirty water and wash water. However, the permit does not specify the use of a lagoon for the capture of clean surface water and is not considered a permitted activity. It should be noted that table S1.1 states clean surface water from areas of the site that are not being used in connection with storing and treating waste can be discharged. During the visit it was noted that the colour of the stored water in the pond appeared dark and looked dirty/ contaminated and did not have the appearance of clean surface water. Pas 110 digestate effluent was observed entering the surface drains at the digestate off-loading point which could enter the lagoon.



AR11	Surface and process water collection and storage	Collection and storage of uncontaminated roof, site surface water and contaminated run-off	From the collection of uncontaminated water (roof and site surface water) and contaminated process
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Permit number
EPR/BP3133TC

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Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
		(leachate and wash water) in one water storage tank.	water from the site drainage systems for re-use on site only. Effluent from the water storage tanks shall not be discharged off site.

Table S3.2 Point source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1 on site plan in schedule 7 emission to Demons Beck	Uncontaminated site surface water from roofs and non-operational areas	Oil and grease	No visible oil or grease	--	Weekly	Visual assessment
Note 1 – Clean surface water from roofs, or from areas of the site that are not being used in connection with storing and treating waste can be discharged directly to surface waters, or to groundwater by seepage through the soil via a soakaway.						

It is acknowledged that you have stated no release of emissions from emissions point W1 have been made and the discharge point is blocked off and all water from the lagoon is recirculated into the plant. During the Agency led Biowaste Treatment Sector permit review it does not appear that the introduction and use of a lagoon has been reflected in the permit review. A Reg 61 response was received from the operator on the 15.05.2020 and on the 24.02.2022 the varied and consolidated permit was issued. Reference to the use of a lagoon has been made in the operator's response to the issued Reg 61 notice but not the permit. As such the activities and emissions to water requirements listed in the permit do not accurately reflect site procedures. Advice and guidance is provided to ensure activities are compliant with the issued permit.

Action: You must review your permit and operations and consider if a variation of the permit is required to ensure the use of the lagoon is compliant with the permit and BAT.

Final Digestate screening.

The materials discharged from the post-digestion system undergo a pressing process to separate solid digestate materials (solid cake) from liquid materials. This pressing unit is situated in an open yard between the Post-Digestion Tank (PDT) and the liquid digestate storage tank. Following segregation, the solid materials are directed into an open skip, while the liquid portion is channelled into a liquid storage tank.

During the visit, a strong odour was detectable from this location, raising concerns about potential for off-site odours as this location sits on the permit boundary. Table S1.1 Activities – AR3 Physical treatment for the purpose of recycling requires that post-treatment screening of digestate is conducted in an enclosed, ventilated building. Any air emissions released during this process should be captured by an extraction system and directed to an appropriate odour abatement system for treatment before discharge into the atmosphere. Furthermore, the ADQP guidance states in section 1.3.1: *The outputs from anaerobic digestion will normally be regarded as having ceased to be waste, and therefore no longer subject to waste management controls, provided they: requires no further processing including maturation or re-screening for use in the designated market sector for which it is destined.* 1.4.1 also states: *Where this Quality Protocol is not complied with, for example the digestate does not meet an approved standard or the producer cannot demonstrate evidence of compliance, the digestate produced will normally be considered to be waste. In such circumstances, the producer/user must comply with the appropriate waste management controls for the transportation, storage and use of the digestate and will be committing an offence if they do not do so.* [426765 EA QP Anaerobic Digestate web.pdf \(publishing.service.gov.uk\)](#)



Immediate odour control measures should be considered to mitigate any potential odours, the skip containing these materials should be covered with a plastic membrane as a short-term solution while stored on site.

Liquid digestate storage tank:

This tank is enclosed; however, it is understood that the tank vents to the atmosphere with no abatement for emissions. During our visit, odours were detected, particularly emanating from the location of the discharge hose. Consequently, monitoring the odour concentration (Oue/m3) in the vent of this tank is required to determine the necessity for an odour abatement system.

Digesters:

During the visit, Officers observed a non-operational de-gritting unit adjacent to one of sites digesters. The unit's open skip was filled with materials containing small plastic pieces, as shows in the photo below.



Although no odour was detected from these materials it remains unclear whether the washing process effectively removes all odour-causing chemicals. The engineer informed officers that the de-gritting unit is enclosed, ensuring that all air emissions from the process are captured and redirected back into the digester tank to preserve biogas. However, there is a risk of odour release from the discharge of washing water, as the site's discharge system is not sealed. Odour-causing chemicals dissolved in the washing water could escape into the atmosphere, potentially intensifying odours from other sources on the site and leading to off-site odour pollution.

Therefore, it is advised that covers are used for the storage skip and discharge washing waters enter a sealed drainage system to minimise the risk of odours from this process.

The operator explained that the primary objective of de-gritting digester materials from the tanks is to reduce solid content to create more headspace for biogas production during digestion. However, you are advised that this process may inadvertently remove methane-generating bacteria, thereby reducing both the quantity and quality of biogas generated at the site. Therefore, de-gritting to remove unwanted materials should be conducted upstream, prior to feeding materials into pasteurisation tanks, to ensure a seamless material flow through the AD process downpipes.

Site biogas management systems:

Biogas generated from site digesters is directed either towards upgrading systems for biomethane generation or to a gas engine for electricity production. Additionally, a flare is employed at the site to combust biogas of insufficient quality and serving as a standby abatement measure when other biogas equipment is non-operational or maintenance is required.

During our visit, the site engineer confirmed that the site's flare is rarely utilized. However, it was operational during our visit. The operator needs to have regard to whether the site's flare operates as an open system, which can potentially lead to higher odour emissions compared to enclosed flare.

There are two biogas upgrading systems on-site, each comprising a washing scrubber, adsorber, and de-adsorber to purify the biogas by removing carbon dioxide.

Air emissions from the de-adsorber systems are captured and routed to one of three carbon filters to remove volatile organic compounds (VOCs) and residual hydrogen sulphide (H₂S) before being released into the atmosphere via a short horizontal stack at the outlet of the carbon filter.

Jimco abatement system A1:

The operator discussed replacing the Jimco abatement system with a single carbon filter to handle air from the new building and tanks. It is understood that this decision arises from concerns regarding the perceived inefficiency of the UV light system in sufficiently mitigating gas odours before the gas enters the carbon filter. These concerns are supported by the analysis of site data from July and August 2022 conducted by Silsoe.

Prior to implementing any changes, you are advised to conduct comprehensive sampling of the outlet gas stream from each area—be it the building or tanks. This sampling should encompass olfactometry (measuring odour concentration in Odour Units per cubic meter, O_{Ue}/m³), ammonia levels, hydrogen sulphide (H₂S) levels, and Gas Chromatography-Mass Spectrometry (GCMS) analysis to identify odour compounds and their concentrations.

Based on the results of these tests, an informed decision can be made regarding the most suitable treatment technique. This approach ensures that the selected system aligns with the site's specific requirements in terms of size and type of treatment technique(s).

It's crucial to ascertain whether the odour abatement system is designed to comply with odour emission limit values (O_{Ue}/m³) to prevent off-site odour pollution. Regular monitoring of odour concentration (O_{Ue}/m³) is necessary to ensure system performance.

In order for, the Environment Agency (EA) to be satisfied with these proposals to maintain the current carbon filter as the Best Available Technique (BAT) we will need empirical data illustrating emissions from each source the system serves. Additionally, clear identification of design Emission Limit Values (ELVs) for odour concentrations achievable by this system is imperative.



PD1 Carbon Filter:

The digestate materials are transferred into a post-digestion storage tank, which is an enclosed structure vented to a carbon filter for treating extracted air emissions before release into the atmosphere. However, the lack of continuous monitoring data for flow rate and pressure raises uncertainty regarding whether this tank is maintained under vacuum pressure. Consequently, there is no guarantee that the site's monitoring data accurately reflects the carbon filter's effectiveness.

Furthermore, the absence of regular monitoring data for the carbon filter to assess system performance and determine media replacement intervals raises concerns about potential exhaustion of the filter media, leading to the release of odour chemicals and the risk of off-site odour pollution.

Relying solely on detecting odours beyond the site's boundaries and from the filter exhaust point as an indicator of the carbon filter's efficiency is unreliable and may expose site staff to inhaling toxic chemicals emitted from the filter exhaust point.

Therefore, it is imperative to monitor the filter as outlined in the biowaste appropriate measures document, and clearly specify the emission limit value for odour concentration that the system is designed to achieve, along with the corresponding monitoring frequency, in the site's Odour Management Plan (OMP).

It's crucial to recognise that carbon filters are not adequately equipped to treat humid air emissions exceeding 50% humidity and ammonia levels. Consequently, regular monitoring of the inlet gas stream for gas humidity content % and ammonia levels is essential to ensure effective filtration. During the visit, the site manager confirmed that there is no assurance that each carbon filter receives and treats the same amount of gas, potentially leading to uneven usage of the filters. Intense odours were detected within the site area of the biogas upgrading systems, indicating that the carbon filters were not providing efficient abatement.

Conclusion:

Acknowledging the efforts made by the operator to minimise on-site odours, it's crucial to highlight that there are still areas within the site that require improvement to mitigate the potential for off-site odour pollution. The operator must strive to meet and maintain the requirements of Best Available Techniques (BAT) standards and prioritise efforts to minimise potential odour impacts.

It is the operator's responsibility to ensure compliance with their permit conditions to minimise on-site odour. Therefore, it's crucial to recognise that the potential for site odour remains high and should be considered as a potential sources of odour pollution in the area.

While other potential sources may indeed be a significant contributor to odour, it does not necessarily mean that the operator is fully in compliance with Best Available Techniques (BATs) to minimise on-site odour. Therefore, it's crucial to recognise that the potential for site odour remains high and should be considered as one of the major sources of odour pollution in the area.

This CAR form should be read in conjunction with the Environment Agency Site visit report- Warrens Emerald Biogas site dated 20.02.2024 for further information and guidance.

Advice and Guidance actions required and deadlines:

1. Clean the air extraction grill points. Provide evidence of a maintenance schedule for cleaning in the reception hall. **Deadline 01.07.2024**
2. Ensure all bunds are checked and cleaned for pooling water. **Deadline Immediate.**
3. Investigate the integrity of the post digestate tank structure due to evidence of corrosion. **Deadline 01.07.2024**
4. Review the permit in line with AR11 and table S1.1 for the use of a lagoon on site. If required submit an application to vary the permit. **Deadline 01.08.2024**
5. Provide evidence of PAS110 accreditation. **Deadline immediate.**
6. Demonstrate how compliance with table S1.1 Activities – AR3 Physical treatment for the purpose of recycling is achieved when conducting post-treatment screening of digestate outside of a building. **Deadline 01.07.2024**

7. Provide a temporary cover for skips containing screened plastics from the final digestate storage tank to mitigate odours. **Deadline 01.07.2024**
8. Conduct odour monitoring on the liquid storage tank vent to determine odour concentration levels. **Deadline 01.08.2024**
9. Prior to making any changes to the abatement system you are advised to conduct comprehensive sampling of the outlet gas stream from each required area. This sampling should encompass olfactometry (measuring odour concentration in Odour Units per cubic meter, OUe/m³), ammonia levels, hydrogen sulphide (H₂S) levels, and Gas Chromatography-Mass Spectrometry (GCMS) analysis to identify odour compounds and their concentrations.
10. Provide covers for the de-grit storage skips and ensure wash water is captured in an enclosed sealed drainage system. **Deadline 01.07.2024**

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?

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 may request an appeal of the regulatory decision by emailing enquiries@environment-agency.gov.uk within 14 days of receipt of the outcome.

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.