

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

Site	Knothrop Waste Treatment Facility			Permit Ref	MP3231SD		
Operator/ Permit holder	FCC Recycling (UK) Limited						
Date	10/01/2019			Time in	10:40	Out	13:20
What parts of the permit were assessed	Waste acceptance audit						
Assessment	Audit	EPR Activity:	Installation	X	Waste Op		Water Discharge
Recipient's name/position	Site Manager						
Officer's name	EA officers			Date issued		31/01/2019	

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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	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	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	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	A	
	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****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.

The purpose of this audit was to assess compliance with waste acceptance procedures and duty of care transfer notes. The waste acceptance audit focused on a waste stream which has been classified by the waste producer as European Waste Catalogue (EWC) code 01 01 02 (wastes from mineral non-metalliferous excavation). EWC 01 01 02 is an 'absolute non-hazardous' entry, as specified in Waste Classification Technical Guidance (WM3). Absolute non-hazardous waste entries do not require steps 4 – 6 of the waste classification and assessment procedure in WM3 to be carried out.

Pre-acceptance

Pre-acceptance checks were carried out on the waste classified as 01 01 02 in December 2018 to determine if the waste could be accepted by the site and suitably treated. The pre-acceptance analysis suite include organics, inorganics, metals, volatile organic compounds (VOC's) and naturally occurring radioactive material (NORM). Analysis is carried out in on the on-site laboratory and a specialist third party laboratory. Analysis for NORM is carried out in the specialist third party laboratory.

Load arrival and inspection

Waste loads are booked into site at least a day prior to their arrival. If the operator suspects that the waste has been miscoded on the booking form then they will challenge the waste producer on this. The operator also provides advice and guidance to waste producers and brokers if there are any errors in the paperwork they produce. The operator checks that there is sufficient storage capacity on site prior to booking in a waste delivery. When loads arrive on site, they are weighed at the weighbridge. Waste is only accepted if there is suitable storage and treatment capacity on site. The permitted tonnage allowed cannot be exceeded due to the number and size of bulk tanks on the premises. Paperwork is checked by the operator, and any discrepancies resolved before waste is formally accepted. The operator feeds back to the waste producer/broker if there are any errors in paperwork and provides advice and guidance which is a good example of sharing best practice.

Sampling

The booking in form provides the physical and chemical composition of the waste, and details of any hazards and handling precautions. The operator decides whether there are any compatibility issues with the waste stream being accepted and other waste on site. Every bulk tanker load has a sample taken from the back valve rather than the top hatch, to minimise the risk posed by working at heights. If there are doubts about whether the back valve sample is representative, or the waste is of a partitioning nature, then a sample will be taken from the top hatch as well.

Samples are analysed in the laboratory and the treatment process is mimicked prior to the waste being accepted. The sampling is carried out by suitably qualified personnel. Records are kept of the sampling regime. These records were viewed whilst we were on site. Details of the waste being accepted is entered onto the online tracking system. Radiological testing is carried out at a specialist third party laboratory. It was suggested to the operator that gamma spectroscopy could be used by the third party laboratory as a quicker quantitative test. The operator agreed to explore this option with the third party laboratory.

The waste is sampled and analysed for pH, odour and metals as a quick indicator of any change in the characteristics of this waste stream. Specific gravity is used as a quick indicator that the NORM content may be increasing. A full pre-acceptance analysis suite is carried out on the load if any of the indicators suggest a change in the characteristics of this waste stream. Full pre-acceptance testing is carried out every 6 months even if there is no indication that the composition has changed. Samples are kept on site for at least 2 weeks.

Once waste has been sampled, analysed and accepted, a ticket number is given to the driver. The driver is directed to the designated unloading point for the waste to be transferred into a suitable storage tank. The waste is taken from the storage tank and transferred into a mixing tank, where it is dosed with calcium hydroxide and an iron containing acid, to promote the precipitation of heavy metals. The treatment process produces two waste streams, an aqueous effluent and a solid filter cake. Waste is treated in batches, and those that may produce a hazardous filter cake are processed separately from those that produce non-hazardous filter cake. The filter cake produced from the treatment of this waste stream is classed as non-hazardous. Aqueous effluent is tested to ensure it meets the limits in the Yorkshire Water Trade Effluent consent. If the aqueous effluent is within the limits then it is discharged to Knostrop Sewage Treatment Works for final effluent treatment. A filter cake is also produced as a result of the treatment process. The filter cake is analysed to determine if it is hazardous or non-hazardous and is then disposed of to a suitably permitted site.

Record keeping

Comprehensive records are kept on the waste tracking system. The operator can determine how much waste is on site at any one time, including the type of waste and where on-site the waste is located. A unique reference is assigned to the waste load which is generated by the booking system and entered onto the waste tracking system. The booking in form includes details of the waste composition from pre-acceptance checks and the intended treatment route. Pre-acceptance records are maintained and available to be cross referenced and verified with the actual load arriving on site. Details of waste quantities, waste types and locations of wastes are stored on a computerised system and on a USB stick at the site which can be accessed by emergency services in the event of an incident.

In the control room, the quantity and content of any one tank can be viewed in real time. The computerised system also contains records on what waste is in which tank. Tanks can be isolated and automatically shut off should they reach a certain level. We viewed paper work detailing the waste producer, quantity and type of waste and the tank that waste was in. The details on the paperwork matched those on the system.


Rejection

Waste rejection procedures are in place should waste on arrival not confirm to pre-acceptance information or cannot be suitably treated on-site. The procedures also detail notification must be made to the Environment Agency and waste producer in the event that waste is rejected. The operator routinely sends details of rejected loads to the Environment Agency local contact.

Duty of care waste transfer notes

We examined six waste transfer notes on site for loads of EWC 01 01 02. Two of these transfer notes were for waste already treated on site and four were for loads accepted on site on the day of this audit. All these transfer notes were accurate and complete with all information required by The Waste (England and Wales) Regulations 2011.

No compliance issues were noted during this audit.

 Environment Agency		EPR Compliance Assessment Report		Report ID: MP3231SD/0323994	
This form will report compliance with your permit as determined by an Environment Agency officer					
Site		Knostrop Waste Treatment Facility		Permit	
				MP3231SD	
Operator/ Permit		FCC Recycling (UK) Limited		Date	
				10/01/2019	

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.			
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

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.

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 you are unable to resolve the issue with your site officer, you should firstly discuss the matter with the officer's line managers. If you wish to raise your dispute further through our official [Complaints](#) and Commendations procedure, phone our general enquiry number 03708 506 506 (Mon to Fri 08.00–18.00) and ask for the [Customer Contact](#) team or send an email to enquiries@environment-agency.gov.uk. 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.