



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

Site	A1 Wokingham Car Spares			Permit Ref	EPR FP3390EU		
Operator/ Permit holder	Russell James Pike						
Date	23/03/2023			Time in	11:00	Out	11:51
What parts of the permit were assessed	Specified activities, Infrastructure, Management, Incident Prevention, Emissions, Amenity, MRMR						
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge	
Recipient's name/position	TCM						
Officer's name	EBUNOLUWA BILANKULU, Nigel Goff, Alex Carter			Date issued	06/04/2023		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations (EPR). A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our [Compliance Classification Scheme](#) (CCS). CCS scores can be consolidated or suspended, where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your [local office](#).

Permit Conditions and Compliance Summary			Condition(s) breached
a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	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	A	
	2. Accident, emergency & incident planning	A	
e) Emissions	1. Air	N	
	2. Land & Groundwater	A	
	3. Surface water	A	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates & litter	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A	
	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
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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

This was an unannounced inspection carried out by Environment Officers E. Bilankulu, N. Goff and A. Carter. We were shown around the site by one of the Site Managers. The site was operational at the time of the visit. The weather was cool and sunny with a light drizzle.

Non- Compliances

No non-compliances were identified at the time of the visit.

The total non-compliance score for this inspection is 0 CCS points, which makes you a Band A operator. Band A operators currently pay 95% of their baseline annual subsistence fee the following year.

Observations

Environment Officers E. Bilankulu and N. Goff did 15 - 20 minutes of noise monitoring at four locations known for noise reports prior to arriving on site for the inspection. Noise pollution could not be substantiated during the noise monitoring exercise.

Once on site, we were accompanied on the inspection by one of the site managers. There was ongoing concrete resurfacing work to the area of the site leading to the storage area for non-ferrous metal. We started the inspection from the depolluted car storage area where cars are stacked for customers to help themselves to car parts. The cars were stacked on sturdy frames with gaps in between. There was a safe and designated space for customers to work on the car of their choosing which is brought to that area by staff members.

We saw some engine blocks resting on metal container grids that hold oily wastewater when there is rain, and which are emptied as needed. We walked past one of the depollution sheds with new equipment for depolluting vehicles; concrete flooring was in good condition, banded containers were available for the different components being removed from the cars and this was being done under weatherproof cover. We discussed the handling of air con gas in the vehicles being depolluted. A request for F-Gas certification for relevant staff was made and these have since been provided by the site.

We walked past the housed baler and inspected the back of the baling area where residual runoff from the main waste processing area is channelled through to an oil separator which is cleaned out 4-5 times a year. We looked at the interceptor for the site and a dark patch was noted in an area just beyond the perimeter wall. We were unable to gain access to that area. This was pointed out to the site, and they have since confirmed this to be an area where a puddle of dirty water had formed because the ground was slightly lower and had then dried out.

The site inspection then moved on to the main metal depositing and bulking area of the site. Operations were being carried out as required within the noise barrier. More sections of concrete flooring will be repaired in the coming months and site operations will continue around the replaced sections.

Advice & Guidance

There are concerns that some oily surface water runoff might be finding its way to the lower area

beyond the site, hence the dark patch seen beyond the perimeter wall (see photograph 3). Ensure bunding for the yard especially in that area is sufficient and will efficiently keep surface water run off on the site and directed towards the interceptor.

Amenities

The noise on site was of a reasonable level and was only loud once we were on site and in close proximity to operational areas. The road and entrance to the site was free from mud, litter or debris. The site was tidy and there were no obvious issues with pest control.

Infrastructure

The site was tidy with waste properly stored and segregated. The concrete flooring looked adequate in all fully operational areas. The site is within secure premises.

Section 2 – Photographic Evidence

Photograph 1



Photograph 2



Photograph 3



Photograph 4



Photograph 5



Photograph 6



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.