



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

Site	A1 Wokingham Car Spares		Permit Ref	EPR/FP339E		
Operator/ Permit holder	Mr Russell James Pike					
Date	28/06/2019		Time in	10:50	Out	12:00
What parts of the permit were assessed	Amenity, waste acceptance, dust / drainage management					
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge
Recipient's name/position	Clive Owen, Director; Chloe Djemal, Office Manager					
Officer's name	Andy Long, Charlotte Morris, Charlie Tomlinson		Date issued	22/07/2019		

**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**

Permit Conditions and Compliance Summary			Condition(s) breached
<b>a) Permitted activities</b>	1. Specified by permit	A	
<b>b) Infrastructure</b>	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	C3	2.3.1
	5. Plant and equipment	A	
<b>c) General management</b>	1. Staff competency/ training	A	
	2. Management system & operating procedures	C3	1.1.2
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	A	
<b>d) Incident management</b>	1. Site security	A	
	2. Accident, emergency & incident planning	N	
<b>e) Emissions</b>	1. Air	A	
	2. Land & Groundwater	N	
	3. Surface water	A	
	4. Sewer	N	
	5. Waste	N	
<b>f) Amenity</b>	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates & litter	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
<b>g) Monitoring and records, maintenance and reporting</b>	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	A	
	3. Maintenance records	A	
	4. Reporting & notification	N	
<b>h) Resource efficiency</b>	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**

<b>Number of breaches recorded</b>	2	<b>Total compliance score</b> (see section 5 for scoring scheme)	8
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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 site visit. The weather was warm and dry with clear skies and a moderate easterly breeze.

### Noise surveys

Prior to arrival on site five minute noise surveys were conducted on Tiffany Close (RG41 3BN; 400m north of site), Kent Close (RG41 3AN, 400m north east of site), woodland 75m west of Kent Close and on Highlands Avenue (60 meters east of the site entrance at RG41 4SP). No noise from the direction of site was noted at Tiffany Close and Kent Close; the predominant sources of noise were road and overhead air traffic throughout these two surveys. Minimal noise was heard from site's direction within woodland (adjacent to Kent Close). On Highlands Avenue occasional 'clunking' noises were heard from the site, intensity was equivalent to and often less than road traffic noise, air traffic noise was the loudest source at all locations.

### Observations

The site is divided into two main areas to receive and sort trade waste and depollute vehicles; a separate area is used for storage of vehicles for spares and impounded vehicles. On site operations include waste acceptance, depollution of ELVs, sorting of waste and storage of vehicles for parts. Environment officers were escorted on site by Garry Webb and Ollie Haynes. Clive Owen, the site's TCM, was on annual leave at the time of the visit.

An overview of operations, material handling, recent development work and site drainage at the facility was provided by Garry and Ollie. Site inspection included viewing interceptors, segregation and sorting of high value metals including copper and aluminium. The processing plant was operating during the inspection and ELV bays were inspected.

Chloe Djemal provided access to transfer notes and discussed site maintenance audits and issue tracking.

### Non-compliances

**B1 – Engineering for prevention & control** - I have scored a **Category 3 breach (4 CCS points)** for storage of un-depolluted ELVs, contaminated scrap metal and vehicle parts on damaged impermeable surfaces. Uncovered battery containers are being stored in an open area. See photos 1 and 2 for reference.

**Permit condition 2.3.1** states that *all activities shall take place on impermeable surfaces with sealed drainage.*

Impermeable surfaces adjacent to storage bays are significantly damaged, these areas are filled with standing water; areas damaged are located directly downhill from ELV depollution bays. Garry explained that concreted areas require continuous maintenance due to the nature of plant and machine activity. Chloe Djemal advised that this area would be prioritised by the site's maintenance team and will be repaired within two weeks (12/07/2019).

**Table S1.1 of permit** - *Lead acid batteries shall be stored in containers with an impermeable, acid resistant base and a lid that prevents ingress of water.* Uncovered lead acid battery containers were being stored in the open. Garry explained that container covers were not commonly used as they were often damaged during movement and transportation. Garry agreed to temporarily cover battery containers with a lid as they are being filled. Once containers have been filled they will be shrink wrapped to protect from rain.

**Action:** Repair damaged impermeable surfaces by 05/08/2019. Immediately ensure battery containers in use are covered with a lid, when a container has been filled the contents can alternatively be shrink wrapped to prevent risk of rainwater gathering within containers.

**C2 – Management system & operating procedure** – I have scored a **Category 3 breach (4 CCS points)** for failure to record damage to impervious surfaces. Maintenance audits provided (recorded on 20/06/2019) do not identify issues of damage to impermeable surfaces adjacent to sorting bays (see photo 1).

Permit condition 1.1.2 states that *records demonstrating compliance with condition 1.1.1 shall be maintained.* Damage to impermeable surfaces were significant yet were not recorded or flagged within maintenance records provided (dated

20 June 2019).

**Action:** Keep damaged areas clear of contaminated scrap and ELVs until impermeable surfaces are repaired. Ensure records are collected to demonstrate compliance with permit condition 1.1.1 (a).

**Advice and guidance given**

Batteries were not being disconnected from ELVs prior to stockpiling for depollution. Advice was given that batteries left connected in un-depolluted vehicles can short circuit and cause fires. Batteries must be disconnected and removed from vehicles before they're stockpiled for de-pollution. Advice was given that a second TCM is retained to provide cover when the sites current TCM (Clive Owen) is unavailable.

**Waste returns reporting**

Waste returns have been reviewed for Q2 2019; waste received during this period was 10,580 tonnes, waste removed from site was 6,427. Total waste in the current financial year was 10,580 tonnes allowing 29,420 tonnes of additional capacity for the remainder of the financial year. Hazardous waste returns are currently being reviewed and will be reported on separately.

**The total non-compliance score for this inspection is eight. This score places permit (ref. 83313) in compliance Band B (0.1 to 10 CCS points) and will set the permit's subsistence rate at 100%.**

Andy Long (Environment Officer)

**Photograph 1: Damaged impermeable surface with standing water and mixed scrap waste**



**Photograph 2: Battery containers stored outdoor and uncovered**





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**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
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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.	
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We will now consider what enforcement action is appropriate and notify you, referencing this form.	
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**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			
B4	C3	Repair damaged impermeable surfaces by 05/08/2019. Immediately ensure battery containers in use are covered with a lid, when a container has been filled the contents can alternatively be shrink wrapped to prevent risk of rainwater gathering within containers.	06/08/2019
C2	C3	Keep damaged areas clear of contaminated scrap and ELVs until impermeable surfaces are repaired. Ensure records are collected to demonstrate compliance with permit condition 1.1.1 (a).	23/07/2019

## 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 <b>major</b> environmental effect	60
C2	A non-compliance which could have a <b>significant</b> environmental effect	31
C3	A non-compliance which could have a <b>minor</b> environmental effect	4
C4	A non-compliance which has <b>no</b> 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](mailto: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.