



ENVIRONMENT
AGENCY

*Licensed Waste
Management
Facility Site
Inspection
Methodology and
Consistent
Scoring Guidance*

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**LICENSED WASTE MANAGEMENT FACILITY
SITE INSPECTION METHODOLOGY AND CONSISTENT
SCORING GUIDANCE**

This document has been produced under the Chairmanship of Dr Ian White (Southwest Regional Waste Manager and 'OPRA for Waste' Project Manager and Mr Offord Slater Northeast Regional Waste Manager and Functional Review Working Group Chairman. The individuals from the Working Groups are given below:

ANGLIAN	Donald Thomas
MIDLANDS	Barry Heaven & Cormac Quigley
NORTH EAST	Mike Hibbert
NORTH WEST	Howard Thorp
SOUTHERN	Anne Eggleton
SOUTH WEST	Kevan Davies & Mike Harget
THAMES	Bruce Dixon & Janis Filks
WALES	Richard Bernhardt & Phil Saunders.

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LICENSED WASTE MANAGEMENT FACILITY SITE INSPECTION METHODOLOGY AND CONSISTENT SCORING GUIDANCE

1.0 Introduction

1.1 The aim of this document is to introduce and describe the licensed Waste Management Site Inspection Methodology. It is required to give operational effect to the requirements of Waste Management Licence Conditions, Section 33 of The Environmental Protection Act 1990 and of the Operator and Pollution Risk Appraisal (OPRA) Scheme. It should be read in conjunction with the relevant "OPRA for Waste" document. Environmental risk assessment in the preparation of licences is covered by the Library of Licence Conditions and Working Plan specification.

1.2 The purpose of the Inspection methodology is to enable the Environment Agency officers' to have a nationally consistent approach to achieve nationally consistent levels of site inspection for all types of waste management facility.

1.3 The European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL) produced a paper in 1997, in which it indicated the minimum criteria for inspection, and defined inspection in its broadest sense as:

- checking and promoting the compliance of industrial installations within requirements stated in laws, regulations, ordinances, directives, prohibitions and/or permits etc.
- monitoring the general impacts of specific industrial installations on the environment that might lead to enforcement action or further inspection

IMPEL also stated that "Environmental Inspections are a key activity in the implementation and enforcement of environmental law and essential to secure a high level of environmental protection."

1.4 This document will cover aspects such as: the site inspection itself and guidance on:-

- planning and preparing for site inspections;
- the equipment required;
- the use of the inspection forms and
- Health and Safety on site.

1.5 Waste Management Licence conditions are intended to mitigate against any potential impacts site operations may pose. This means that non-compliance with the licence conditions identifies that a problem exists. Where certain licence conditions are not provided for in the licence, the inspector should be mindful of Section 33 of the Environmental Protection Act 1990 (EPA90). Section 33 of the EPA90 states that:

Subject to subsection (2) and (3), a person shall not-
(a) deposit controlled waste, or knowingly cause or knowingly permit controlled waste to be deposited in or on any land unless a waste management licence authorising the deposit is in force and the deposit is in accordance with the licence;
(b) treat, keep or dispose of controlled waste, or knowingly cause or knowingly permit controlled waste to be treated, kept or disposed of-
(i) in or on any land, or
(ii) by means of any mobile plant,
except under and in accordance with a waste management licence ;
(c) treat, keep or dispose of controlled waste in a manner likely to cause pollution of the environment or harm to human health.

An approach to inspecting waste management sites has been devised that not only considers the type and severity of the non-compliance when assessing operator performance but it also considers the environmental significance of that breach or non-compliance.

The various levels of scoring (non-compliance) have been highlighted in the following matrix, (see table 1 on page 3) which has been taken directly from the OPRA for Waste documentation. This matrix will be considered in more detail in section E of this document.

Table 1

Probability Of Environmental Significance

		No impact or minor problems	Long term significance	Immediate environmental pollution/harm
Severity of Non-compliance of licence conditions or Section 33(1)(a), (b) and (c) & 33(6)	Alleged breach of licence conditions and/or Section 33(1)(a), (b) and (c)	1	2	3
	Section 38,42 or 59 notice served	3	6	9
	Emergency works	-	10	15

The scoring method for probability of environmental significance is based upon a consideration of source, pathway and receptor. The following broad definitions should be used:-

Definition of "0":- Compliance or Minor Technical Infringement.

- In the main this score is given for compliance with licence conditions, or compliance when inspecting against s33(1)(c) of the Environmental Protection Act 1990.
- In some cases a minor technical infringement and there is no environmental impact (where, the operator has or is taking the necessary steps to comply, and where no additional action is required by the operator.)

Definition of "1":- No Impact or Minor Problems. SCORES 1 AND 3.

- There is an alleged breach of licence conditions or s33(1)(c) of the Environmental Protection Act 1990, where there is a potential for minor impacts and;
- the inspector requires action of some form by the operator to mitigate against possible harm.
- The actual level of harm or pollution at the receptor needs to be considered in terms of breach and enforcement. It is unlikely that emergency action will result from no impact or minor problems. Where a breach is identified then score of 1 is assigned and where enforcement action is undertaken (i.e. the issuing of a Notice) then the score of 3 becomes inserted.

Definition of "2":- Long Term Significance. SCORES 2, 6 AND 10.

- As '1' above and there is potential for the score to become a '3' i.e. significant pollution within a longer period of time if not rectified. [Related to both, one-off events or cumulative effects].
- The actual level of harm or pollution at the receptor needs to be considered in terms of breach, enforcement or emergency action, as these increase the level of seriousness and consequently increases the score assigned. Where a breach is identified then score of 2 is assigned and where enforcement action is undertaken (i.e. the issuing of a Notice) then the score becomes 6 and where emergency action is required then the score of 10 becomes inserted.

Definition of "3":-Immediate Environmental Pollution/Harm. SCORES 3, 9 AND 15.

- Where there is an alleged breach of licence conditions or s33(1)(c) of the Environmental Protection Act 1990, and;
- Action is required by the operator to mitigate against imminent or serious harm or pollution of the environment [inspectors should use source, pathway and receptor (SPR) methodology to guide them]. This impact may result in both a short term effect or long term pollution, i.e. do not downgrade to a score of '2' because it has long term impact.
- The actual level of harm or pollution at the receptor needs to be considered in terms of breach, enforcement or emergency action, as these increase the level of seriousness and consequently increases the score assigned. Where a breach is identified then score of 3 is assigned and where enforcement action is undertaken (i.e. the issuing of a Notice) then the score becomes 9 and where emergency action is required then the score of 15 becomes inserted.

SECTION B THE LEGAL BASIS

1.0 The legal basis for inspection. (In England and Wales)

1.1 The Environmental Protection Act 1990 Section 42 (1) requires that while a licence is in force it shall be the duty of the Waste Regulation Authority (Environment Agency) which granted the licence to take the steps needed :-

- (a) for the purposes of ensuring that the activities authorised by the licence do not cause pollution of the environment or harm to human health or become seriously detrimental to the amenities of the locality affected by the activities.
- (b) for the purposes of ensuring that the conditions of the licence are complied with.

1.2 The steps necessary to achieve these duties include:

- periodic, unannounced inspections;
- enforcement of licence conditions;
- site audits and regular review of licences;
- modification of licence conditions where required.

It is vitally important that the operators are made aware that the breach of their Waste Management Licence conditions is a criminal offence. The Agency approach in such matters is to follow up such breaches in accordance with the Enforcement and Prosecution Policy Functional Enforcement Guidelines.

2.0 The Relevant Objectives for Inspection & Monitoring.

2.1 Schedule 4 (4)(1) of the Waste Management Licensing Regulations 1994 states that the following objectives are relevant objectives in relation to the disposal or recovery of waste –

- (a) ensuring that waste is recovered or disposed of without endangering human health and without using processes or methods which could harm the environment and in particular without :-
 - i) risk to water, air, soil, plants or animals; or
 - ii) causing nuisance through noise or odours; or
 - iii) adversely affecting the countryside or places of special interest

2.2 The Environment Agency is therefore charged with maintaining a programme of assessment of the operation of licensed facilities in order to ensure that the conditions of licences continue to remain appropriate and effective in achieving the above requirements.

2.3 Currently the effective inspection of licensed waste management activities relies greatly on the knowledge and experience of the officer, both in the legislative discharge of their duties and their 'local knowledge' of sites.

3.0 Statutory Guidance on Inspection of Licensed Sites.

3.1 Waste Management Paper No 4 (WMP 4) provides formal guidance under section 35(8) of the 1990 Act which the Environment Agency has a duty to have regard to in discharging its waste management function under Part II of the 1990 Act.

3.2 WMP 4 states that the inspection system should include provision for detailed checks against the licence conditions of such things as:

- Operational areas,
- Reception facilities,
- Monitoring points,
- Site records,
- Site infrastructure,
- Environmental monitoring,
- Surface pollution,
- The condition of equipment and
- Pollution control measures.

3.3 This guidance states the level of inspection, which it suggests, should be achieved by employing a number of different methods including -

- Routine Inspection
- Specific Environmental Monitoring Exercises
- Inspecting Sites outside of their Operational Hours
- Extended Inspections (Site Audits)
- Engineering Inspections
- Incident Response
- Post Operational
- Pre Operational
- Mobile Plant

The methods are described in more detail in the following section.

SECTION C TYPES OF INSPECTION**1.0 Routine Inspections**

- 1.1 Routine inspections will be those carried out most frequently at waste management sites. The frequency of these inspections is currently determined with reference to WMP4. It is proposed that the frequency of inspections will be determined by reference to a "ranking" derived from the Operator and Pollution Risk Appraisal (OPRA) system
- 1.2 This type of inspection is primarily a visual check in order to confirm or otherwise compliance with the conditions of the licence. In addition, where appropriate licence conditions do not exist the site should be inspected against Section 33(1)(c) of the Environmental Protection Act 1990. Where there are Amenity issues these should be checked at the same time. Consideration should be given, in certain circumstances, to consulting the Environmental Health Department of the Local Authority with regards to noise and odour issues.
- 1.3 The inspection is used to gain an overall impression of the day to day operation of the site. In addition, the quality and applicability of the Working Plan to site operations can be ascertained. Where a breach of licence conditions is observed, appropriate action should be taken in accordance with the Environment Agency Enforcement and Prosecution Policy and Functional Guidelines.

2.0 Specific Environmental Monitoring Exercise.

Specific monitoring exercises will focus on those conditions which, in the main, are detailed in the environmental monitoring section of the licence, i.e. those relating to the monitoring and management of gas, leachate and groundwater, but may also address matters such as waste inputs and site records. Such exercises may identify problems that can be followed-up in the course of subsequent routine inspections. For detailed information on environmental monitoring please refer to the "OPRA for Monitoring" document.

3.0 Inspecting Sites outside of their Operational Hours.

Inspecting the site for compliance against those licence conditions concerned with hours of operation and opening hours of the site; site security and any other aspects which can be inspected given that access to the site may be limited, subject to the requirements of section 108 (4) of the Environment Act 1995.

4.0 Extended Inspections (Site Audit).

This type of inspection may be undertaken at any waste management facility. It will include a detailed inspection and comprehensive review of compliance with all licence conditions and a review of the working plan by way of a detailed examination of all aspects of the operation.

Such an exercise could extend over several days, and may require a team of officers, depending on the complexity and the size of the site, e.g. Co-disposal site or a special waste treatment facility etc.

Audit is seen both as a method of assessing detailed licence compliance and a review of the adequacy and effectiveness of the licence together with the working plan. Again planning, undertaking of the audit, reporting and taking actions on the information obtained are all key stages in this method of site inspection. This type of inspection is unlikely to be undertaken more than once annually.

5.0 Engineering Inspections

Inspection to confirm compliance with any of the engineering requirements of a licence both during and after construction, or arising from engineering remediation works. Such an inspection is unlikely to investigate all of the engineering requirements but focus on certain aspects, e.g. installation of the liner or drainage system. The officer may refer to further technical guidance in the form of Waste Management Papers or the "Interim Guidance for Inspecting the construction of landfill liners" Sept. 98.

6.0 Incident response.

Inspection of a site in response to information received from any source, e.g. a member of the public [through the Regional Communication Centre (RCC)]; emergency services; local authority. The focus of the inspection will be determined by the information received and any matters which arise whilst on site.

Following the investigation and inspection of the site, and the ultimate completion of the site inspection report form, the unique numbering system on the form should be entered on an incident database. This will assist in cross-referencing the incident response and the findings and the actions of the visiting officer.

7.0 Post Operational Site Inspection.

Inspection of a waste management facility to confirm its status as closed, and to ensure that environmental harm is prevented. This type of inspection will focus the officers' attention on certain site-specific factors such as, stability of site, landfill gas, groundwater monitoring or surface water monitoring, and any remediation measures including capping or cover material. For detailed information on environmental monitoring please refer to the "OPRA for Monitoring" document.

This type of information will be invaluable when the Environment Agency is involved in site licence surrender discussions.

8.0 Pre Operational Site Inspection.

Inspection of a waste management facility to confirm its status as pre-operational, and to ensure that environmental harm will be prevented. This type of inspection will focus the officers' attention on certain site-specific factors such as ensuring that no waste has been deposited on site. (and the preparatory work for the necessary infrastructure is satisfactorily underway).

In addition some background environmental monitoring may be required, hence the officer may check to see if all the appropriate monitoring points been installed and located.

9.0 Mobile Plant Inspections

Inspections of mobile plant to confirm that it is operating in accordance with its licence and generic/local working plans, specifically to ensure that it is undertaking the appropriate treatment of waste. The storage of the waste prior to, during treatment and residual material should be checked to ensure that it is being managed, stored and handled in a safe manner.

For all of the above types of inspection, a Site Inspection Report Form (SIRF) can be completed, purely detailing the specific requirements of that inspection. These forms should then be submitted to the relevant EPO team to ensure that the OPRA scores are considered and counted towards the overall site score.

SECTION D INSPECTION METHODOLOGY

Whilst this section focuses on the approach to routine inspections, specific additional guidance is given for Pre-operation, Post -operational and Mobile plant inspections.

Waste Management Paper 4, (WMP4) provides guidance on site inspections and inspection frequencies. It also acknowledges that inspection schedules require planning, programming and organisation by the Environment Agency, but advises that they should be random and unannounced from the point of view of the site operator. WMP4 advises that the complexity of the site and the requirements of monitoring should guide the frequency of site inspections needed for a particular site.

The Agency has proposed an 'OPRA for Waste' system that will provide a decision making process that enables inspections to be targeted on a site-specific basis. The Agency resources for the purpose of implementing the proposed system will be allocated on a geographical basis and there will be an initial three-month assessment for each type of facility. Thus, in future a quarterly review will be undertaken and site inspections allocated via OPRA system.

1.0 Planning the Inspection.

1.1 Before undertaking the site visit the planning process of a routine inspection should take place and should include as a minimum the following information and equipment.

1.2 The officers should familiarise themselves with the following relevant site information;

- The permitted operation of the site
- The type of waste management facility
- The permitted waste types and important exclusions
- The location of the site
- Comments made on recent inspection forms
- Any other relevant information (some of which is listed below) in satisfying the overall objectives of the inspection as outlined above.
- The site licence and working plan (see definition/explanation below)

The working plan is compiled and drawn up by the applicant and submitted in support of a waste management licence application. It should show how the applicant proposes to prepare, develop, operate, restore and complete the facility.

During the application process the draft working plan is assessed against the working plan specifications identified in the licence library entry as applying to the proposed activities of the facility. In this way, optimal reliance is placed on the operator's working plan,

allowing some operational flexibility, whilst specifying and maintaining the appropriate and necessary controls over the quality and content of the working plan.

It may be appropriate, that when preparing site inspection schedules, to include rotation in an Environmental Protection team. Rotating or alternating officer visits has the dual benefit of a 'fresh' pair of eyes reviewing the site activities on alternate occasions. In addition, it enables the officers to have the reassurance that if something is not identified as a non-compliance by one officer, another officer may recognise it; and the appropriate action may be taken.

Occasionally, consideration should also be given, whilst on site, to inspecting the details of some of those waste carriers using the facility. When doing so details such as the availability of waste transfer notes, (including Special Waste Consignment Notes) and the details given on waste transfer notes together with any proof of registration should be viewed where possible.

1.3 Site Information / Summary Data / Working File.

Much of the relevant information required to aid a site inspection should be held on the working site file. It is therefore important to ensure that the files are kept up to date with the inclusion of all recent site inspection forms, and other documentation and information that is relevant to the activities of the site.

Much of the information that would be appropriate to being included in such a document would be gathered during the application process. It may therefore be appropriate for the Environmental Planning staff to compile a summary of this information when the licence is issued or modified.

Information that could be placed in the working file should include:

- Reference to the location of any operator/Agency monitoring data arrangements.
- Notification of nearby areas of environmental sensitivity e.g. proximal watercourses which may be vulnerable; residential areas and sites of special scientific interest.
- Notification of proximal activities which may affect the findings of a site inspection e.g. nearby industrial or agricultural processes which may give rise to their own odour emissions.
- The nature of the relationship between the operator and the Agency, so that the officer is aware of any potential conflict situations. The officer may need to be accompanied by another officer if there has been difficulties at the site, or where a welcome from the site guard dog can be expected!

- Note of any other authorisations relating to the site issued by the Environment Agency, or any other authority e.g. Local Planning.
- In addition, to the above information, the officers should familiarise themselves with the licence conditions and working plan for the site to be visited. Knowledge of the requirements of the planning permission for the site is also useful. Also, for example, prior knowledge on site plans of drainage and gas extraction systems etc, would be of benefit.
- It is also crucial to review the recent inspection report forms. This will inform the officer of whether or not there have been recent breaches of licence conditions, any remedial actions required of the operator and any current enforcement action being undertaken. Copies of recent inspection forms may be made by the officer to take on site with them.

In order to assist the officers in their role of site inspection, consideration may be given to collating copies of relevant site information from the site file or public register, and creating their own condensed working site file. This has the added benefit of providing the necessary information when out on site.

It should be noted that other legislation may require the production of the information contained within that file, for example 'The Criminal Procedure and Investigations Act 1996' or 'The Environmental Information Regulations 1992'.

2.0 Equipment Check.

In order to carry out their duties a varied amount of documentation and equipment may need to be carried by the officers as a matter of course. The planning stage of the site inspection should include a check to ensure that all the necessary equipment is available where required.

A list of such equipment is given below.

*Hard Hat (with current date)
High visibility jacket
Protective Wellington boots or other appropriate protective footwear
Sampling equipment
Legal container seals
Authorisation (ID card or warrant)
Business Cards
Statement of Witness forms
Interview record forms
Pocket notebook
Inspection report forms & guidance
Copy of site file information
Copies of the PACE Code B search forms
Waste Management Licence & Working Plan
PACE seizure receipts*

*Agency information leaflets.
Protective goggles/glasses
Camera with spare film
Maps of the area inspecting
Mobile telephone.*

THE SITE INSPECTION

3.0 Undertaking the Inspection.

- 3.1 To ensure that waste management facilities cannot prepare for an inspection and so that normal operations are observed, routine inspections should be unannounced, unless there is a specific reason to prearrange the operator's presence on site, e.g. the officer may wish to discuss specific operations with the site operator.

Additionally, the day of the week and the time of day of the visits and even the visiting officers to any one site should be varied or rotated.

It should be noted that the inspection starts before actually entering the site, for example licence conditions appertaining to;

- Noise
- Odour
- Mud on the road
- Dust
- Site security
- Site sign

The above are just some examples of what may be inspected before going on to the site, there may be other criteria that are perhaps site specific. The above list is not comprehensive, it highlights the type of criteria one may anticipate inspecting outside of the operational area of the site.

- 3.2 Once on site the officer should, where possible, report to the site office to make their presence known, normally to the site management and if necessary present their ID/Warrant card. Ascertain the availability of any technically competent staff if currently required to be on the site.
- 3.3 Site checking-in procedures may vary greatly from site to site. In some circumstances a required checking-in point may be totally separate from the actual licensed area itself. Ensure that where possible you sign in, even just a note in the site diary.
- 3.4 During the inspection the operators' performance in running the site should be assessed against the licence conditions and working plan. Inspections should be systematic and objective and wherever possible the officer should not deviate from his/her intended course of inspection. Officers may consider the use of their pocket notebook during

the inspection as they consider it appropriate or in any case where an offence has been suspected.

- 3.5** Some operators may wish to accompany officers during the visit. This practice should be encouraged as it offers the opportunity to discuss the site management/infrastructure and any other site related issues such as a non-compliance that may arise during the inspection. In certain circumstances the officer may need to speak to a specific member of the site staff e.g. site engineer. However, inspectors should be permitted to undertake their tasks without interference, provocation or unnecessary delay.

4.0 Reporting and Actions

- 4.1** Feedback to the operator of a site during and following an inspection is most important. Whilst carrying out an inspection the Agency officers should use the opportunity to raise the awareness of the site operator as to the environmental consequences of their activities and performance. Such feedback should relate back to the licence conditions and working plan.
- 4.2** A written Site Inspection Report Form (SIRF) of the visit (see section E) should be completed by the officer (on site) following each routine or specific inspection. A copy of this form must be left with the operator/licence holder or one of their representatives when they are on site. The officer should take this opportunity to discuss his/her findings with the site manager, and where necessary arrange for actions to be taken to rectify the situation. Where it is not possible to leave a copy of the report form with a site representative it must then be forwarded to the operator/licence holder as soon as possible thereafter. **It must be noted that this scenario should not be the norm, with only extenuating circumstances preventing the form being left on site with a site representative.**

Where this happens, a timescale for work to be implemented/completed should be agreed with the operator and confirmed later in writing if necessary. Ask the operator to sign the SIRF to acknowledge its receipt. If he strongly disagrees with the officer's findings, and hence won't sign, he should be given details of who to contact in the Agency to deal with his concerns. Leave the SIRF with the operator even if it is unsigned.

- 4.3** Where there is evidence of a breach of licence conditions and/or Sections 33(1)(a), (b) and (c) and when when scoring as a non-compliance 1, 2, or 3, the officer should be mindful of the

Environment Agency Enforcement and Prosecution Policy, and the requirements of the Police and Criminal Evidence Act 1984.

The officer may enter a written warning on the SIRF if there is appropriate grounds for such action. A subsequent letter from the Agency officer may follow.

- 4.4** Significant issues arising from inspections should be reported to relevant colleagues in order that appropriate actions may be taken. Where a specific inspection has been carried out and reported on the SIRF then it should be passed to the relevant EPO team to ensure that it is included in the overall OPRA score for a site.

- 4.5** In addition to feedback at the time of an inspection, WMP4 suggests that regular site liaison meetings should be held.
- 4.6** The Environment Agency has adopted a Common Incident Classification Scheme (CICS). Should an event, fall within the scope of the scheme, the scheme may be able to offer assistance as to what action should/must be taken by the investigating officer. Thus, if during an inspection of a Waste Management Facility a non-compliance is observed the officer may be mindful of the CICS scheme and use it to determine the appropriate course of action if a comparable situation arises on site.

5.0 Inspection of Post Operational sites.

- 5.1** The Environment Agency has a duty to also inspect closed waste management facilities. Every closed site will have its own unique characteristics and the officers will have to use their experience and knowledge of the site to ascertain exactly what equipment they may need to take with them when inspecting.
- 5.2** Preparation for the inspection of the site, by the officer, should be followed along the lines of that stated in Section D, 1 and 2. Closed facilities may take the form of closed remediated landfill sites, ~~that may or may not have some sort of~~ development on them or they may take the appearance of a green field. The officer should consider the specific criteria related to the site and tailor the inspection to concentrate on these only.
- 5.3** As mentioned in 3.1 there may be a number of licence conditions that could appertain to the facility that the officer should be mindful of, and inspect against before arriving on site.

5.4 Once on site, the number and type of conditions that may be inspected could be limited. The main licence conditions to be regulated against are:

- Waste on site. - Confirming the site status as closed.
- Remediation/capping/cover material. – Visual inspection to identify potential problem areas.
- Stability of site. – Visual inspection to identify potential problems.
- Monitoring for Methane gas, Leachate, Groundwater, Surface water. – Depending on the site specific receptors, monitoring could be carried out as part of the inspection.

5.5 The officer should also record on the inspection report form any other aspects of the site that are deemed relevant.

6.0 Inspection of Pre Operational sites.

6.1 The Environment Agency has a duty to also inspect pre-operational waste management facilities. Every pre-operational site will have its own unique characteristics and the officers will have to use their experience and knowledge of the site to ascertain exactly what equipment they may need to take with them when inspecting.

6.2 Preparation for the inspection of the site, by the officer, should be followed along the lines of that stated in Section D, 1 and 2. Pre-operational facilities may take the form of landfill sites, that may or may not have some sort of development on them or they may take the appearance of a green field.
The officer should consider the specific criteria related to the site and tailor the inspection to concentrate on these only.

6.3 As mentioned in 3.1 there may be a number of licence conditions that could appertain to the facility that the officer should be mindful of, and inspect against before arriving on site.

6.4 Once on site, the number and type of conditions that may be inspected could be limited. The main licence conditions to be regulated against are:

- Waste on site. - Confirming the site status as in the pre-operational phase.
- Engineering and/or preparatory works. – Visual inspection to identify potential problem areas.
- Monitoring point installations. – Depending on the site-specific requirements.

6.5 The officer should also record on the inspection report form any other aspects of the site preparation that are deemed relevant.

7.0 Inspection of Mobile Plant.

7.1 The Environment Agency has a duty to also inspect mobile plant waste management facilities. Every mobile plant will have its own unique characteristics and the officers will have to use their experience and knowledge of the site to ascertain exactly what equipment they may need to take with them when inspecting.

7.2 Preparation for the inspection of the facility, by the officer, should be followed along the lines of that stated in Section D, 1 and 2. Mobile plants facilities may take undertake a variety of waste management functions.
The officer should consider the specific criteria related to the function and tailor the inspection to concentrate on these only.

7.3 As mentioned in 3.1 there may be a number of licence conditions that could appertain to the facility that the officer should be mindful of, and inspect against before arriving on site.

7.4 Once on site, the number and type of conditions that may be inspected could be limited. Some of the main licence conditions to be regulated could be:

- Waste type. - Confirming the facility is managing only the waste for which it has been licensed.
- The safe management of waste. – Visual inspection to identify potential problem areas.
- Environmental monitoring. – Depending on the site-specific requirements.

7.5 The officer should also record on the inspection report form any other operational aspects of the facility that are deemed relevant.

SECTION E SITE INSPECTION REPORT FORMS

DEFINITION GUIDANCE & INSTRUCTION FOR COMPLETING THE WASTE SITE INSPECTION REPORT FORMS

1.0 Introduction

The Waste Management Site Inspection Report Forms (SIRF) have been devised with the following main objectives in mind.

- To enable a nationally consistent approach to achieve quality levels of site inspection for all types of waste management facility.
- To include only those relevant conditions as laid out in the latest library of licence conditions.
- To include only those OPRA scoring components of the licence conditions.
- To provide ample provision for additional text where required.
- To reduce the overall number of inspection forms.
- To ensure a quality inspection on every visit.

2.0 Guidance on completing the Site Inspection Report Form.

Currently, there are three waste facility inspection forms. One form to be completed on inspecting licensed landfill sites, mobile plant and one to be completed for the remaining types of licensed facility. There is also a continuation sheet that can be used to facilitate additional text when it is required.

Where one licence covers more than one activity at a particular site for example a landfill with a treatment plant attached, only one inspection form should be used. The choice of form used should be determined by the charge band applied to the site in the current Fees and Charges scheme. Where necessary, inspectors should make use of the blank inspection criteria boxes on the inspection form.

The numbers in the boxes at the top of the form, and the criteria to which they relate are explained below:

- 1 Name of site:** Enter the site name & address, as indicated by the site licence.
- 2 Name of site Operator/licence holder:** Enter the Operators name, when the operator and the licence holder are different parties.

- 3 Waste Management Licence Number (WML):** Enter the number as indicated on the site Licence.
- 4 Officers' name:** As a minimum criteria the initial and the surname of the officer must be entered.
- 5 Date:** Please use the style DD/MM/YY to indicate the date of inspection.
- 6 Time:** Use the 24hr clock to record your time of arrival and departure.
- 7 Area Office:** This may be the Area or Sub Area as decided in your Region.
- 8 Weather conditions:** Only record the aspects that are significant to the type of inspection being undertaken i.e. temperature, high winds and direction, precipitation and visibility.
- 9 Type of site:** The facility type should be indicated on the site licence. Highlight by ticking against the appropriate facility type. Current definitions of type of facilities are given below.

LANDFILLS

A1 Co-disposal

Landfill sites licensed to receive ranges of commercial, household and/or industrial waste which require special precautions in their handling including that which is classed as special under the Special Waste Regulations 1996 (Excluding bonded asbestos) together with municipal waste which is capable of decomposition, or similar degradable wastes, in such a way that the waste may gradually undergo a form of treatment.

A2 Other special waste

(indicate as Co-disposal on inspection form)

Landfill sites licensed to accept mainly HCl/inert waste but in addition are permitted to take bonded asbestos as the only form of special waste.

A3 Borehole

(indicate as other on inspection form)

A licensed facility for the disposal of liquids, directly into the ground via boreholes, for land injection purposes.

A4 Household, Commercial and Industrial

Landfill sites licensed to receive controlled waste from any source, excluding those licensed to receive purely non-biodegradable waste and/or licensed to accept special or other wastes, which require special precautions in their handling. This category also includes sites exclusively licensed to accept household, or commercial or Industrial wastes. This category also includes sites licensed to accept pets for burial.

A5 Non-biodegradable Landfill*(indicate as Inert on inspection form)*

Site licensed to accept purely non-biodegradable waste for landfill. This category would not include construction/demolition wastes or canal dredging.

A6 Other Waste*(indicate as other on inspection form)*

Landfill sites licensed to accept construction/demolition waste and canal dredgings etc.

A7 Factory Curtilage Landfill

Landfill sites within the curtilage of industrial premises licensed to accept only waste arising from those premises or premises not on site but accepted as part of the licence.

A8 Lagoons*(indicate as other on inspection form)*

Licensed facilities that have been artificially constructed for the containment, storage or disposal of liquids.

WASTE TRANSFER

Where transfer stations are licensed to physically process the waste then they should be classified in these categories (including sorting, compaction, pulverising and baling (except where it includes mixing special and non-special waste)), otherwise classify under treatment processes.

A9 Special Waste

Sites licensed to receive any type of special waste, for transfer between modes of transport and/or bulking up. This may include some forms of treatment, such as compaction, provided that they are solely for the purpose of improving payloads. This category will include asbestos waste transfer stations.

A10 In-house storage

Sites for the storage of waste on the same premises where the waste was produced. These will be limited to sites for the storage of special wastes, as the storage of other waste in such circumstances is exempt from licensing.

A11 Household, Commercial and Industrial

Sites licensed to receive any type of controlled waste, other than purely non-biodegradable waste and Special Wastes, for transfer between modes of transport and/or bulking up. This may include some forms of treatment, such as compaction, provided that they are solely for the purpose of improving payloads. Also includes sites licensed for the storage of waste prior to direct transfer to sewage treatment processes.

A12 Clinical Waste Transfer Station*(indicate as special on inspection form)*

Sites licensed to receive any type of clinical waste, for transfer between modes of transport and/or bulking up. Waste transfer stations licensed to accept mainly or

solely Prescription Only Medicines (POM's) should be treated as special waste transfer stations. This category to include storage of waste at Part B incinerators.

A13 Household Waste Amenity Sites*(indicate as CA site on inspection form)*

Sites licensed directly to Local Authorities and operated by them as licence holder. It does not include sites operated by Local Authority Waste Disposal Companies LAWDC's or Private contractors which should fall under the other transfer station categories.

A14 Non-biodegradable waste transfer stations*(indicate as Inert on inspection form)*

Site licensed to accept purely non-biodegradable waste for transfer.

TREATMENT

If the operation involves two or more processes classify in the highest scoring category in the list below i.e. Physico/chemical treatment with biological treatment classified in Physico/chemical treatment. The processes make no distinction between treatment of special and non-special wastes.

A15 Material Recycling Facility

Sites licensed to receive any type of controlled waste for the purposes of subjecting it to physical and/or chemical processes for material recycling. This category also includes drum reconditioners.

A16 Physical*(indicate as treatment on inspection form)*

Sites licensed to receive any type of appropriate controlled waste for the purpose of subjecting it to any physical process intended to change its properties. e.g. soil screening, waste oil recovery, Refuse Derived Fuels (RDF).

A17 Physico-chemical*(indicate as treatment on inspection form)*

Sites licensed to treat wastes, which results in final compounds or mixtures that are disposed of by means of physico-chemical methods (e.g. Evaporation, drying, calcination etc)

A18 Incinerator

Sites licensed to receive any type of controlled waste for the purpose of waste disposal by incineration, for part A and B exempt incinerators, i.e. under 50kg/hr. This could also include pet crematoria.

Metal Recycling Sites

A19 Vehicle Dismantlers Sites licensed only for the dismantling of vehicles

A20 Mixed MRS Licensed sites, the primary purpose of which is to keep and treat metal waste for reuse

or recycling. These sites may also be dismantling vehicles in addition to other activities.

A21 Chemical Treatment

(indicate as treatment on inspection form)

Sites licensed to receive any type of appropriate controlled waste for the purpose of subjecting it to any chemical process intended to change its properties.

A22 Composting Facility

(indicate as treatment on inspection form)

Sites licensed to receive any type of biodegradable waste for the purposes of subjecting it to an aerobic biological process.

A23 Biological treatment

(indicate as treatment on inspection form)

Sites licensed to receive any type of appropriate controlled waste for the purpose of subjecting it to any biological process intended to change its properties. e.g. Anaerobic digestion. This includes any licensed land-spreading activity.

A24 Mobile Plant

Plant defined as mobile plant in Regulation 12 of The Waste Management Licensing Regulations 1994 (as amended)

- 10 Type of Inspection: Tick as appropriate.
- 11 Site Operating Status: Tick as appropriate;
Not receiving waste means, site gates are closed for the acceptance of waste, ie. the site is in pre or post operational stage or the licence has been suspended or revoked ('Not receiving waste' does not mean that there have been no deposits of waste whilst the officer is on site.)
Receiving means the site gates are open and the site will accept waste whether or not any waste is arriving.

Table. 2

- 12 Site life status: Tick as appropriate.

Status	Definition
Operational	Site is open to receive waste.
Pre-Operation	Infrastructure work may have started on the site, but not yet ready for waste importation.
Post Operational	Site is closed, or under restoration, or operations have been suspended, or awaiting the certificate of completion.

Please note, on sites where phased operations result in an area being operational while another is being restored it is deemed operational.

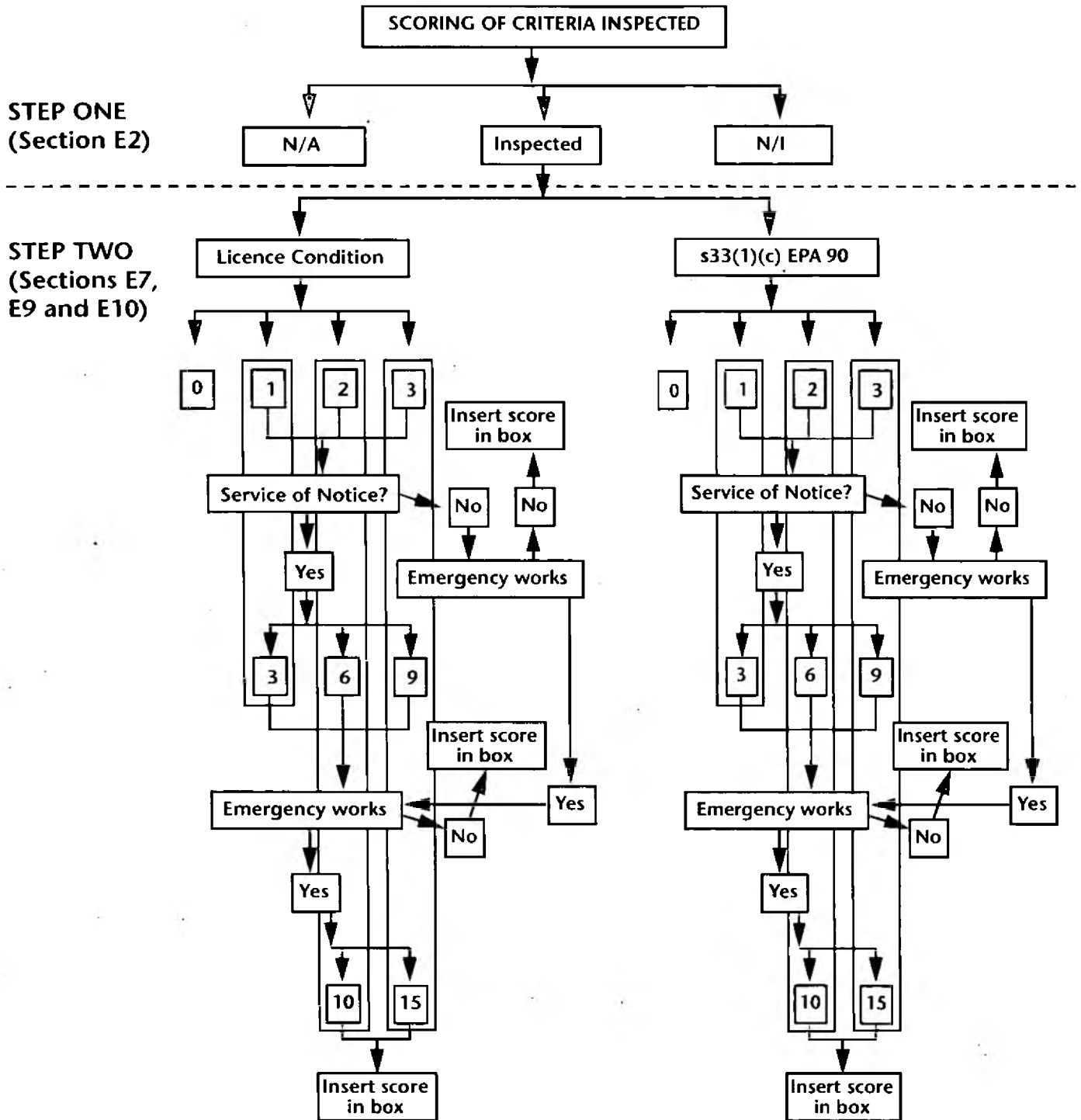
- 13 Site areas/phases inspected: Please identify which area/phase of site operation was inspected if all site operational areas/phases were not inspected.
- 14 Report to Environment Agency Manager: Please enter the name of the manager/Team Leader to whom a copy of the inspection form will be given/sent.

15 Inspection results

Scoring of Criteria Inspected

The following section of the guidance notes refer to the middle section of the form, the actual criteria against which the site is inspected. In the boxes provided, one of the following; N/A, N/I, /, 0, 1, 2 or 3 or greater where appropriate should be entered. All the Criteria boxes must have an entry against them following an inspection.

The following flow diagram gives some additional guidance on the thought process for scoring the criteria inspected.



STEP ONE: Identify whether criteria are to be inspected, not inspected (NI), or are not applicable (NA).

Table 3

Section	Headings	Action on Inspection form (SIRF)
3.0	Criteria to be inspected	Section 15 on SIRF.
4.0	Inspected - breach of licence condition	Score as STEP 2.
	Inspected - breach of s(33)(1)(c)	Insert '/' and score as STEP 2 in comments box.
5.0	Not inspected	NI
6.0	Not applicable	NA

3.0 Criteria to be inspected.

The lists of criteria are condition titles taken from the Library of Licence Conditions. These condition titles are intended as pointers to direct an officer, who is conducting a routine inspection, to inspect these aspects of the operation at this type of facility. However, as with any inspection of a site, an officer should always investigate and record on an inspection form any evidence of non-compliance/breach of section 33, whether or not the incident is an aspect that is routinely inspected.

The reference numbers (the reference numbers are not licence condition numbers) alongside the criteria boxes, gives each criterion its own unique identity. For ease of identification the same number is used on each of the inspection forms for the same criterion. These numbers have been installed as some Areas/Regions have indicated that they wish to input the inspection form data into a database, which provides a useful way of determining which criterion are being breached on a more regular basis.

Where criteria are inspected during an inspection then the scoring factors are given below under Step Two.

4.0 Identification of Licence conditions and/or provisions of s33(1)(c) EPA 90

Where the site licence has conditions that correspond to the listed criteria, they should be scored in the appropriate boxes on the SIRF, as indicated in 'Step Two' and in Appendix 3. However, it is recognised that not all licences will contain conditions that correspond to the listed criteria (particularly in those older licences) on the inspection forms.

Where the licence fails (by way of not having any or inadequate licence conditions) to control any potentially polluting activities on site, the officer should inspect that aspect of the sites' operations being mindful of Section 33(1)(c) taking the appropriate 'Protective' or 'Offence' action where necessary.

The aspects of waste management operation for which there are no licence conditions should be assessed and scored as if there are appropriate conditions (that is to say it will initially be scored 1, 2 or 3 depending on the seriousness). The scoring should then be noted in the comment box and a diagonal line put through the relevant criterion key box.

These scores will be counted in the overall site inspection score.

The officer should use the comments/action box to explain and/or describe the difficulties inspecting against such licences.

Where there are similar conditions, these should be inspected insofar as it is possible by way of a routine inspection; i.e. engineered containment systems can only be inspected during a routine inspection where the system is installed and visible.

5.0 Criteria which are Not Inspected (NI)

Where the corresponding condition is not inspected, NI should be entered in the key column. Reasons for not inspecting particular conditions that correspond to one of the listed condition titles, should be briefly explained in the comments field, e.g. if there was no delivery of waste during the officers time on site, it is not possible to inspect (Ref. 2) Waste Types and Quantities. And in addition, if there is no waste in the designated reception area, NI should be entered in the key column and justified in the comments/action box, by means of a short explanation.

6.0 Criteria which are Not Applicable (NA)

At some sites there will be no need to impose controls and this will be reflected in there being no conditions in the licence corresponding to the criteria listed on the inspection report form. For example, there may be no requirement for an inert landfill to have a leachate management system. Therefore, "N/A" should be entered in the scoring box against leachate management (criteria No.6).

STEP TWO**7.0 Scoring of Criteria Inspected****Breach of licence or s33(1)(c), [scores 0, 1, 2 and 3]**

Table 4

Section	Headings	Action on Inspection form (SIRF)			
		Scores			
		Compliance and minor technical breaches	No impact or minor problems	Long term significance	Immediate Pollution
7.0	Scoring of Criteria Inspected	0	1	2	3
9.0	Enforcement	-	3	6	9
10.0	Emergency	-	-	10	15

It is important that in analysing the type of breach that has been committed, it is recognised that some defaults will have greater significance than others, and that differential is incorporated. The evaluation will vary depending on the type, scale of the facility, its location, the phase of the sites' life during assessment and also changes in the affected environment.

The inspection form should be marked with a "0, 1, 2 or a 3" in the Key column against the criteria to which the inspected licence condition(s) correspond.

Some licence contraventions have greater environmental significance than others, hence it is important to score them accordingly. Contraventions should be scored as indicated in Table 1 of this document:

Score 1 = No impact or minor problems.

Score 2 = Long term environmental significance

Score 3 = Immediate environmental pollution/harm

In addition, the inspector should also take into consideration those 'non OPRA' licence conditions, which must still be complied with, (these are licence conditions that are not explicitly catered for on the inspection forms) the scoring of these conditions, and any relevant comments should be entered in the comments/actions box and form part of the overall OPRA operator assessment score.

Any entry on the form in respect of non-compliance must be accompanied by comment identifying:

(a) the exact number of the licence condition that has been breached;

(b) the nature of the breach;

(c) what action has been required of the operator; and

(d) any comment by the operator in respect of the breach and required action.

It must be stressed that the examples given in Appendix 3 are for guidance only and that it is recognised that a non-compliance may well, depending on the circumstances, fall into a more serious category, for example, a '1' Non-Compliance may become a '3' Non-Compliance, given extreme circumstances. Repeated non-compliance or site specific (risk assessment) may also attract an elevated score, through enforcement action.

The following order should be adopted when recording details of breaches-

- record details as per (a)-(d) for all breaches of conditions. Where there is no condition in the licence but there is a problem and control is considered necessary (i.e. "section 33"), record details of the problem in the comments box;
- Assess the significance of non-compliance/problem and against each score 1, 2 3;

These scores are then recorded in the box provided against the relevant criteria.

Note- some licences may have, for example, two conditions in respect of litter control and the operator is breaching both conditions. Both breaches will have been recorded in the comments box, but only the higher score should be entered against *control of litter (criteria 29)* which will count towards the OPRA score. This is to ensure parity of scoring between different sites where there may be identical problems but one site has more conditions corresponding to the problem than the other.

8.0 On-Going Breaches of Licence Conditions or s33(1)(c) EPA 90

Where there is a continuing breach (that is where a non-compliance has been identified on a previous inspection, and is still occurring) it will continue to attract a score,

until the problem is rectified. The appropriate 1, 2 or 3 score should be entered in the relevant box, or under s33(1)(c) enter a '/' in the criteria box and an explanation in the comments box.

If officers having applied their knowledge and experience and having referred to the inspection guidance, are still unsure of the 'level' of the visually observed non-compliance, they must seek advice/assistance from an appropriate member of the relevant department of the Environment Agency.

Where a monitoring breach has been identified on a previous inspection or where operator data identifies a non-compliance it should be recorded in the comment box and scored for the purposes of OPRA.

Following the site inspection and the completion of the SIRF, the officer should, if breaches of licence conditions and/or s33(1)(c) of the EPA90, have been identified and initially scored, advise the operator that in such circumstances the criteria score may be elevated as a result of e.g. serving an enforcement notice. In such instances the officer should record this possibility in the comments/action box.

9.0 Enforcement (Scores 3, 6, and 9)

Where the nature of the non-compliance [either with a licence condition or Section 33(1)(c)] is such that enforcement action may be considered, this may be in the form of issuing enforcement notices under Sections 38, 42, and 59 of the EPA 90. Reference should be sought through the relevant functional guidance underpinning the Environment Agency Enforcement and Prosecution Policy.

The following is an extract from the Environment Agency Enforcement and Prosecution Policy and gives guidance on when to consider various methods of enforcement action.

Offences at licensed sites.

- *Where an offence is committed at a licensed site and has resulted in, or had potential to result in, a Category 1 or 2 incident, a prosecution will normally be pursued*
- *Where a licence condition has been breached and has resulted in no or Category 3 impact or potential impact, consideration should be given to issuing a warning or formal caution. Prosecution will normally be pursued in respect of those types of breaches where the operator has shown a history of non-compliance sufficient to call into question the effective management of the licensed site or to prevent effective regulation by the Agency.*

The score in these cases becomes 3, 6 or 9 as indicated in table 1 of this document.

The Environment Agency Enforcement and Prosecution Policy (EPP) requires that when an offence is detected, the Environment Agency shall respond to it. The response may be split into the following (as indicated in Table 4 of the EPP):

- The Protective Response.
- The Offence Response.

The Site Inspection Report Form (SIRF) allows the officer to record the 'Protective Response' action required.

In terms of the 'Offence Response', when an offence is detected the Agency shall either:

- Warn
- Formally caution, or
- Prosecute the offender

The SIRF may be used to issue an on site warning (thus allowing officers to comply with the EPP without writing a warning letter)

When using the SIRF to issue a warning the comment box should make it clear that:

- the officer considers an offence has been committed
- the Protective action required in respect of that offence
- no further action will be taken in respect of that offence.

Please note: Occasionally warnings by letter should be employed to support the issuing of a site warning identified on the SIRF. If it is believed that the offence would warrant enforcement action (in the form of a Notice), then the SIRF should not record that no further action will be required [the issue of any warning could seriously preclude the taking of prosecution for that identified offence].

10.0 Emergency Works (Score 10 & 15)

Emergency works should be considered where the nature of the non-compliance [either with a licence condition or Section 33(1)(c)] is comparable to a category 1 incident as identified by the Environment Agency, Common Incident Classification Scheme (CICS).

The score in this case becomes 10 and 15 as indicated in table 1 of this document.
(it is unlikely that a minor problem in most cases would require emergency action)

11.0 At the base of the form the following information is required:

- 16 Sample/measurements/photos taken:** Tick where appropriate, indicating if any photographs, measurements and/or samples, have been taken by the visiting officer during the inspection.
- 17 Comments/actions:** All relevant comments regarding the inspection may be entered here. Following an inspection the officers comments and in addition, any relevant comments from the operator/licence holder should be recorded here. Actions required by the officer, or to be undertaken by the operator, to rectify a situation should also be entered here. This box may be used to enter the name of any person(s) and the business or Authority that they represent when accompanying the Environment Agency officer during the inspection.

The operator/licence holder is not permitted to write the comments themselves on the form. If the operator/licence holder wishes to express their comments/explanations they should be directed to the reverse of the SIRC for the appropriate address or phone number. The officer may make a note of the operators concerns in the comment box.

- 18 Letter requested:** The operator/licence holder requesting a letter from the inspecting officer following an inspection. The letter may be of the sort indicating to the site operator/licence holder that certain works are required (within a certain time period) to comply with the site licence conditions.
- 19 Continuation sheet:** Indicate here if a continuation sheet has been used. Ensure all details are completed e.g. WML number, report ID number (*officers please enter this number as it will not be printed on the continuation sheet*), date etc. Officer to sign and the operator to sign to state receipt. Finally, a reminder to all officers completing site inspection forms, please be aware that a copy of the form is placed on the public register, and as such becomes a public document. Hence, please be accurate and concise in the terminology used in describing the actions of the operator and their operations.
- 20 Officers' signature:** Inspecting officer to sign in this box.
- 21 Site operator/licence holder signature:** Site operator or licence holder to sign (signing only to state receipt of the inspecting form.) and to print name and position.
The White (top) copy goes to the site operator/licence holder.
The Yellow (middle) copy is the file copy.
The Blue (bottom) copy is the Public register copy.

Breach of conditions that are not routinely monitored.

Where there is evidence of a breach of a condition for which a corresponding title is not listed on the form this must be recorded in the blank comment field located under inspection results on the right-hand-side of the form

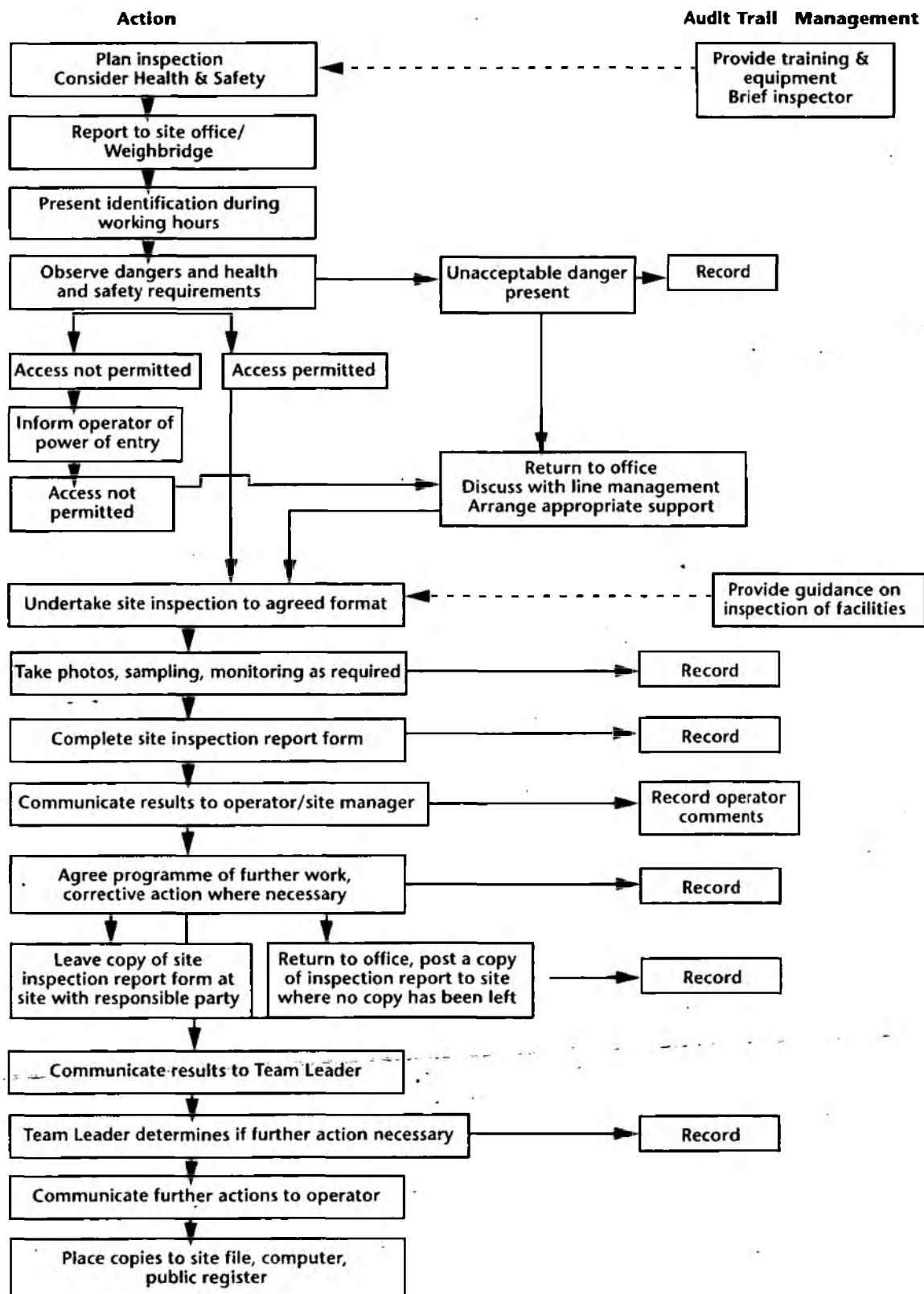
Remember any entry on the form in respect of non-compliance must be accompanied by comment identifying:

- (a) the exact number of the licence condition that has been breached;
- (b) the nature of the breach;
- (c) what action has been required of the operator; and
- (d) any comment by the operator in respect of the breach and required action.

The conditions 'criteria' have been placed in the above '1, 2 and 3' categories as guidance only. Please refer to Appendix 3 for further, more in-depth guidance on scoring licence condition non-compliance or breaches of section 33(1)(c) EPA90.

Officers on site will clearly have to use their skill and experience and take into account any extenuating and site specific issues before determination and ultimately indicating any licence breach in the appropriate non-compliance category.

Procedural Framework for Routine Inspections



APPENDIX 2 HEALTH AND SAFETY ON SITE INSPECTIONS

OFFICER SAFETY ON LICENSED WASTE MANAGEMENT FACILITIES

Each Environmental Protection Officer is responsible for their own safety. The following notes have been prepared to assist inspectors in recognising hazardous situations whilst on site. This by its nature cannot be an exhaustive list and therefore inspectors must be vigilant at all times for their own safety and that of other persons around them.

Officers are strongly advised to familiarise themselves with the waste types accepted by the licensed site they intend to inspect. This will give some indication of the waste being imported but also the potential hazards associated with the waste.

The officers should familiarise themselves with any existing Environment Agency Health and Safety policies/documents appertaining to lone workers and safety on site and relevant legislation for comprehensive advice.

Before commencing inspections:

- Make sure you are booked out in the log - full details of your intended movements should be given if at all possible.
- Make sure you phone the office at the end of your inspections so that they know you are safe.
- Make sure you have all your health and safety equipment with you including, where applicable, a phone.
- Make sure you have your first aid kit with you.
- Follow the in-house code. (where one has been installed)

When on site be aware of:

- Dangerous or hazardous material e.g. asbestos, chemicals etc. if possible, keep up wind of such wastes, thus reducing the possibility of inhalation.
- Do not walk through pools of water, there may be hidden hazards and you do not know the depth.
- Landfill gas, confined spaces.
- Unfenced lagoons and riverbanks.
- Bird scaring devices and leachate spraying facilities.
- Vehicle movements and vehicles unloading, including skips being moved.
- Sharp protruding objects, trip hazards.
- Take care where waste is stacked, it may be unstable e.g. scrap yards.
- Be aware of excavations, trenches etc (falling hazards).

Take the necessary following precautions, these are, in the main, common sense, but must be adhered to at all times:

- During investigation and enforcement work be aware if someone becomes aggressive, Should the person behave in a manner where it appears likely your safety is to be put at risk you must terminate the conversation and leave the premises.
- Beware of dogs and other potentially wild animals - carry your dog stop alarm if you have been issued with one.
- Be aware of overhead cables.
- Wear appropriate clothing for the season - in winter make sure you keep warm and have extra clothing available, you may need to change if you get wet.
- Always know your location! In case you need to call for help.
- Be careful where you walk - look out for soft ground, deep mud, unstable ground and slopes and walk around them.
- Ensure machine operators and drivers know of your presence, approach vehicles and machinery from the side where the driver or operator is located, make sure he sees you.
- On unmanned sites there won't be help immediately available if you need it - take extra care. Lone worker criteria should be applied.
- When inspecting 'contentious' sites leave your car in a location that will enable you easy unrestricted access to afford a swift exit. Lone worker criteria should be applied
- Hygiene - wash your hands before you eat (carry and use the bactericidal hand wipes etc).
- Cover cuts and skin abrasions - always wear protective gloves when sampling waste materials, this includes leachate and water sampling.
- Wear full safety equipment on site. When investigating unknown waste types ensure you wear the correct hand protection, e.g. syringe proof gloves.
- Keep your mobile phone with you at all times.
- Be aware of poor phone reception and notify base, beforehand, if inspecting in a bad reception area.
- Drive carefully.

The number placed in this box corresponds to the licence criteria number on the inspection forms	TITLE The licence condition is given in this box together with some prompting questions the inspector may ask.			
	Criteria Score	Examples	Notes	Consequence of non-compliance with the various licence conditions
	0	<p>Examples will be given in this box as to what scenarios found on site may be given the score of '0'.</p> <ul style="list-style-type: none"> ● In the main this score is given for compliance with licence conditions, or compliance when inspecting against s33(1)(c) of the Environmental Protection Act 1990. ● In some cases a minor technical infringement and there is no environmental impact (where, the operator has or is taking the necessary steps to comply, and where no additional action is required by the operator.) 	In this box and the three boxes below text may have been placed to provide additional lines of thought and perhaps indicate other variables that may have to be taken into consideration when scoring a scenario.	Potential consequences of non-compliance with the licence conditions are provided to illustrate the seriousness of licence condition breaches.
	1	<p>Examples will be given in this box as to what scenarios found on site may be given the score of '1'.</p> <ul style="list-style-type: none"> ● There is an alleged breach of licence conditions or s33(1)(c) of the Environmental Protection Act 1990, where there is a potential for minor impacts and; ● the inspector requires action of some form by the operator to mitigate against possible harm. 		
	2	<p>Examples will be given in this box as to what scenarios found on site may be given the score of '2'.</p> <ul style="list-style-type: none"> ● As '1' above and there is potential for the score to become a '3' ie. significant pollution within a longer period of time if not rectified. [Related to both, one-off events or cumulative effects]. 		
	3	<p>Examples will be given in this box as to what scenarios found on site may be given the score of '3'.</p> <ul style="list-style-type: none"> ● Where there is an alleged breach of licence conditions or s33(1)(c) of the Environmental Protection Act 1990, and; ● Action is required by the operator to mitigate against imminent or serious harm or pollution of the environment [inspectors should use source, pathway and receptor (SPR) methodology to guide them]. This impact may result in both a short term effect or, long term pollution, i.e. do not downgrade to a score of '2' because it has long term impact. 		

This table offers additional guidance on the scoring of breaches of licence conditions and/or s33(1)(c) of the EPA 90.

	General compliance with Licence or s33(1)(c)	No Impact or minor problems	Long term significance	Immediate environmental pollution/harm
Breach	Monitoring and reporting generally acceptable but there is some missing data or late reporting, due to unavoidable circumstances. Operator rectifying problem Score = 0	Reported data parameters do not conform to requirements of licence/working plan. Score = 1	Trace evidence of leachate in groundwater boreholes or other controlled waters. [from monitoring data review] Score = 2	Evidence of leachate in groundwater boreholes outside of site at levels above trigger levels [from monitoring data review]. Score = 3
Enforcement Notice		Continued non-conformance, or failure to amend data parameters in period agreed. Score = 3	On-going situation in which the operator has failed to provide or demonstrate a method of compliance. Score = 6	Failure to manage and contain leachate. Pollution occurring immediate remedial action required by the operator. Score = 9
Emergency Works			Uncontrolled discharge of leachate due to leaking pipe. Score = 10	Leachate in river Score = 15

1	TITLE Specified Operations Are the Specified operations made clear in the site licence? Are the Specified operations being adhered to on the site? Is there a clear understanding of the specified operation on the site? Are any unauthorised activities (contrary to that specified on the licence front sheet) being undertaken? Do the site operatives know what the operational limitations are?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Specified Operations
	0	<ul style="list-style-type: none"> Will only score 0 if in total compliance with Specified Operations. Any non-compliance will most likely attract a higher score. 		(a) Reduced control of risks associated with activity.
	1	<ul style="list-style-type: none"> Non-permitted wastes identified at the tip face or tipping area requiring the operator to undertake mitigating action e.g. sorting or removal. 	In most cases if there is a non-compliance for specified Operations it is most likely to be given a score of 2 or a 3.	
	2	<ul style="list-style-type: none"> Any other unauthorised disposal or recovery activity or operation. 		
	3	<ul style="list-style-type: none"> Any other unauthorised disposal or recovery activity or operation which results in serious harm or pollution of the environment. Operation extending outside licensed area 	Fundamental non-compliance with the licensing framework/legislation. Follow up enforcement action will be determined by actual or potential impact	

Ref: Licence Condition and WP Guidance :- 1.1 – Specified waste management operations

2	TITLE: Waste Types and Quantities Ensure the site is accepting only those wastes indicated on the licence. Do the operatives know what wastes the site is permitted to take? Are the wastes imported in manageable quantities? Does the licence stipulate the quantities of waste permitted during a specific time period? Are these being adhered to?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Waste types and Quantities
	0	<ul style="list-style-type: none"> Borderline compliance with the quantities of waste being imported but remedial measures are being actioned, by the operator. Insignificant quantities of non-permitted wastes inadvertently accepted but safely dealt with/removed, by the operator. 		(a) Pollution of watercourses. (b) Pollution of land.
	1	<ul style="list-style-type: none"> Borderline compliance with the quantities of non-special or non-difficult wastes being imported but no initial action on the part of the operator. The officer should ensure that operator undertakes the appropriate corrective action. Small quantities of non-permitted wastes noted on a previous inspection that has not been removed in the time period as requested. 		
	2	<ul style="list-style-type: none"> Small quantities of biodegradable wastes being permitted into an inert landfill, which may accumulate over time to give rise to landfill gas problems. 		
	3	<ul style="list-style-type: none"> Excessive quantities (as measured by the sites ability to handle waste) of any types of waste being permitted on to the site, and there is a clearly identified link to pollution, requiring the operator to take immediate action. 		

Ref: Licence Condition and WP Guidance :- 1.2 Permitted wastes

3 TITLE: Staff Understanding of Licence/Working Plan (Staffing and Management, Supervision and Understanding) Are all the relevant staff aware of, and know the location of the working plan & site licence? Do they understand the need to comply with the contents of these documents? Are the documents available to the relevant staff?			
Criteria Score	Examples	Notes	Consequence of non-compliance with Staff Understanding of Licence/Working Plan
0	<ul style="list-style-type: none"> Site has no TCM or deemed competence or CQE because the previous manager had unexpectedly left less than six months earlier. An alternative TCM is actively being sought. 		(a) Failure of Operations
1	<ul style="list-style-type: none"> Staffing numbers detailed by licence or working plan not being met. No or minor environmental damage occurring. Site has no TCM or deemed competence or CQE etc, to satisfy the basic legal requirement of technically competent management and Fit and Proper Person. Site has no TCM or deemed competence or CQE because the previous manager had unexpectedly left less than six months earlier. (could result in higher score if enforcement action is taken under s38 EPA90) No or minor environmental damage occurring. Agreed site attendance time standard not being met by TCM. No or minor environmental damage occurring. Evidence of a lack of understanding of licence or Working plan which is not causing a breach of any other licence condition. No or minor environmental damage occurring. As a result of poor awareness, an actual or potential breach of licence or working plan occurs, but little or no impact on the environment, human health or local amenity. E.g. Not aware of sign requirements, road maintenance requirements etc. No or minor environmental damage occurring. 		(b) Pollution of the Environment (c) Harm to Human Health (d) Detriment to the Local Amenity
2	<ul style="list-style-type: none"> As a result of ignorance a breach of licence or working plan occurs which has the potential to become significant in the longer term. E.g. not aware of cover requirements, no DETAILED understanding of which wastes can be accepted (understands principles), not aware of all waste handling requirements for the permitted waste types. 		
3	<ul style="list-style-type: none"> As a result of ignorance an actual or potential breach of licence or working plan occurs with a serious impact on the environment or human health. E.g. unavailability TCM which does lead to failure of a major safety or pollution control system (including containment, monitoring requirements), ignorance of waste checking procedures etc. 		

Ref: Licence Condition and WP Guidance :- 1.5 Staffing and Understanding of Requirements

4	TITLE: Surface Preparation – unengineered sites (Only landfills not requiring containment.) What preparatory works have been agreed? Does the working plan indicate the method in which the work should be undertaken? If so, is this being adhered to?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Surface Preparations – Unengineered sites
	0	<ul style="list-style-type: none"> Work undertaken in a satisfactory manner. 		(a) Production of leachate and landfill gas due to presence of organic materials where no containment systems are provided. (b) Instability of waste/slopes
	1	<ul style="list-style-type: none"> Agency not notified within the specified period of intention to commence waste deposits, no impact arising from waste deposits. 		
	2	<ul style="list-style-type: none"> Site not properly cleared, waste deposited onto material with potential to generate landfill gas or leachate, that could result in harm to human health or pollution of the environment. 		
	3	<ul style="list-style-type: none"> Biodegradable waste deposited on site where protective clay layer removed and underlying aquifer exposed. 		

Ref: Licence Condition and WP Guidance :- 2.[310] Surface Preparation – unengineered sites

5	TITLE: Engineered Landfill Containment Systems (Landfill Only) Ensure the engineering infrastructure is being or has been installed correctly and in the appropriate areas of the site. Is it possible to inspect the landfill liner in those areas of the site that are not yet in use? If yes, is it free of large creases and devoid of holes and tears? Can the operator demonstrate that the facility is containing the liquor being produced?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Engineered Landfill Containment Systems
	0	<ul style="list-style-type: none"> Relevant data and records appertaining to the containment system not submitted for a short time (<7 days) due to unavoidable circumstances, operator rectifying problem. Only applies if waste has not been deposited in cell. 		(a) Pollution of surface waters and/or groundwater. (b) Substandard installation (c) Contamination/pollution of land and/or watercourses (d) Landfill gas migration
	1	<ul style="list-style-type: none"> Relevant data and records appertaining to the containment system not submitted for a short time (< 7 days), inspector highlights problem to operator. Still no waste deposited in the cell. Evidence of minor leachate breakout or LFG migration from 'contained' area of the site, resulting in minor impact and has been otherwise contained and managed via secondary methods. 		
	2	<ul style="list-style-type: none"> Not providing the Environment Agency with engineering specifications (relevant data and records) of containment system in a period > 7 days. Waste has been deposited in the cell. Any damage to containment systems, e.g. tears, cracks, slits and damaged welding which could lead to leakage of liquor or escape of LFG from deposited waste. 		
	3	<ul style="list-style-type: none"> Infilling of waste in areas of the site where the CQA report has indicated that the containment system is inadequate, or that the containment system installed has not been installed. Any damage to containment systems, e.g. tears, cracks, slits and damaged welding resulting in leakage of liquor or escape of LFG causing significant pollution and/or harm to human health Leakage of liquor or escape of LFG from any area of the 'contained' site causing immediate environmental pollution and/or harm to human health. 	Always applicable regardless of site location. This could require emergency action [score = 15]	

Ref: Licence Condition and WP Guidance :- 2.[210]. 1-4 Engineered site containment and drainage systems

6 TITLE: Leachate management and monitoring systems (Landfill Only) Is the leachate being managed and contained in the manner indicated by the licence/working plan? Is the monitoring being undertaken using the agreed system and at the agreed frequency?			
Criteria Score	Examples	Notes	Consequence of non-compliance with Leachate management and monitoring systems
0	<ul style="list-style-type: none"> Damaged borehole or partially buried borehole, remedial action being taken by the operator. 		(a) Pollution / Contamination of Surface water or Groundwater.
1	<ul style="list-style-type: none"> Minor damage to control equipment and no remedial action taken until the inspector identifies the problem e.g. borehole caps missing, borehole buried. Leachate level within site exceeds trigger levels and agreed action plan implemented - no evidence of Leachate breakout at surface or of leachate in groundwater boreholes. 		
2	<ul style="list-style-type: none"> Control equipment, e.g. pumps, working but unsatisfactorily. Infrastructure required updating. Trace evidence of leachate in groundwater boreholes or other controlled waters. [from monitoring data review] 		
3	<ul style="list-style-type: none"> Control equipment not working, e.g. pumps not working, leachate treatment plant not working, and overflowing, urgent maintenance required. Evidence of Leachate breakout at surface, flowing rapidly towards or into a river Evidence of leachate in groundwater boreholes outside of site at levels above trigger levels [from monitoring data review]. 	Consider implications for Reg 15. Where action plan fails, it should be reviewed.	

Ref ; Condition and Guidance : 2.[330] Leachate Management systems
 5.[200].3 Leachate generation action plan

7 TITLE: Landfill Gas Management Systems (Landfill Only) What management systems are being used? Have they been agreed by the Agency? Can the operative demonstrate the effectiveness of the system?			
Criteria Score	Examples	Notes	Consequence of non-compliance with Landfill Gas Management Systems
0	<ul style="list-style-type: none"> Minor problems relating to control equipment where repairs and/or maintenance are already programmed and equipment is operating satisfactorily. 		(a) Migration hazards (b) Explosion/Fires (c) Amenity/Odours (d) Contribution to global warming.
1	<ul style="list-style-type: none"> Flare stacks/pumps/generators that service non-sensitive locations are down for short period of times (< 1 hour). Minor damage to gas management systems that service non-sensitive locations, e.g. valves/caps loose or missing, no repairs identified. Inspector identifies problem to the operator. 	Would normally only apply where sensitive receptors > 50 metres from boundary. If in sensitive locations may score 2 or 3. Only applicable where no malodours are detected beyond site boundary and there is no evidence of landfill gas migration.	
2	<ul style="list-style-type: none"> Control equipment, e.g. pumps, working but not adequate. Infrastructure required updating. May happen where gas being extracted and positive pressure in site. 	Only applicable where sensitive receptors are > than 50 metres from boundary. Where < 50 metres or geology is sensitive then should score 3.	
3	<ul style="list-style-type: none"> Flare stacks/pumps/generators that service environmentally sensitive locations are down for extended period of times (> 1 hour) and gas escaping urgent maintenance required. Significant damage to gas management systems, e.g. boreholes/pipelines missing, damaged resulting in landfill gas escape. 	Always applicable where sensitive receptors are < than 250 metres from boundary. If > 250 metres then may score 2 dependent upon a site-specific assessment of seriousness of non-compliance (likely to apply to remote locations only).	

Ref: Licence Condition and WP Guidance :- 2.[340].1-6 Landfill gas management system

8 TITLE Surface Water Management System (Landfills Only) What management systems are being used? Have they been agreed by the Agency? Can the operative demonstrate the effectiveness of the system?			
Criteria Score	Examples	Notes	Consequence of non-compliance with Surface Water Management System
0	<ul style="list-style-type: none"> Minor ponding on surface of an inert landfill site not in a designated location and not leading to contamination of clean water intended for discharge to a watercourse, and action being taken by the operator. 	Licences/working plans may specify a location(s) to which clean surface water within the site should be drained to ensure that it is kept separate from water which is likely to be contaminated from operational areas. Clean water should not be permitted to accumulate in other areas of the site.	(a) Pollution of "clean water" discharges. (b) Uncontrolled production of leachate (c) Flooding causing damage to site equipment/disruption of operations (d) Flooding outside the site boundary (e) Erosion of restored areas.
1	<ul style="list-style-type: none"> Uncontrolled discharge of surface water not causing pollution. 	In all cases the score may have to be increased if pollution of a sensitive or high value watercourse is threatened.	
2	<ul style="list-style-type: none"> Minor erosion on restored area affecting the integrity of the final cap Failures to maintain segregation of clean and contaminated water systems. Minor erosion of soil cover on restored area. Major accumulation of surface water not in an intended location leading to disruption of, or difficulty with site operations, or damage to site equipment/installations. 	Any escape of surface waters onto adjacent land should be viewed more seriously if the water is contaminated. The nature of the adjacent land will also be relevant. Take account of any discharge consent requirements/compliance.	
3	<ul style="list-style-type: none"> Flooding outside the site causing serious complaint/damage. Failures to maintain segregation of clean and contaminated water systems causing significant pollution. Major erosion on a restored area effecting the integrity of the final cap 		

Ref: Licence Condition and WP Guidance :- 2.[350].1-6 Engineered surface water management systems

9	TITLE Installation, maintenance and protection of final cap. (Landfill Only) Has the agreed capping action been taken? Is the appropriate capping material being used? Are there any planning consent issues appertaining to the installation and final capping of the site, which must be considered?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Installation, maintenance and protection of final cap.
	0	<ul style="list-style-type: none"> Works temporarily delayed for < 7 days due to unavoidable circumstances. Action being taken by the operator. 		(a) Increased liquid infiltration generating Leachate
	1	<ul style="list-style-type: none"> Contrary materials included in protection layer. (e.g. concrete, tyres, timber, scaffolding). Failure to submit Certified Quality Assurance (CQA) validation report within specified time scales whilst cap was being installed. 	Scores should be increased in cases of unlined biodegradable landfill sites. Note to be taken of likely settlement, thickness of cap and confidence in QA.	(b) Increase in uncontrolled release of LFG and odours (c) Surface water contamination from perched leachate or run off
	2	<ul style="list-style-type: none"> Damage to cap threatening its integrity Installation of cap without the benefit of a Quality Assurance/Quality Control (QA/QC) system. Visible contrary materials incorporated into cap (e.g. concrete, tyres, timber, and scaffolding). Failure to install cap within timescale specified within the licence. 		(d) Water ingress to gas extraction systems (e) Physical damage to cap
	3	<ul style="list-style-type: none"> Absence of cap in various areas on site Visible breaches in the installed final cap evident. 		(f) Exposure of wastes, liable to cause serious detriment to amenity and harm to human health. (g) Detrimental impact on restoration

Ref: Licence Condition and WP Guidance :- 2.[360].1-7 Installation, maintenance and protection of final cap

10	TITLE: Site Identification Board. No site sign or incorrect details on site sign			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Site Identification Board
	0	<ul style="list-style-type: none"> General details correct, minor misspellings etc, amendments in progress. 		(a) Not possible to contact operator in case of emergency on site.
	1	<ul style="list-style-type: none"> ID board erected, but in inappropriate position Site details given on the ID board are incorrect 		
	2	<ul style="list-style-type: none"> No ID board erected. 		
	3	<ul style="list-style-type: none"> Unlikely to give rise to examples in this category. 		

Ref: Licence Condition and WP Guidance :- 3.1 Provision of site identification board.

11	TITLE: Site Security Is the site made secure against vandalism or unauthorised deposits? Does the fencing etc require any repair work? Are there any parts of the site that do not have adequate fencing etc. i.e. to the standard of the licence or working plan?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with : Site Security
	0	<ul style="list-style-type: none"> Minor damage to fencing, no evidence of unauthorised access. The appropriate repair work is being undertaken and will be completed by end of day. Site is secure in accordance with the requirements of the licence/WP. 		(a) Risk to trespasser's Health & Safety (b) Risk of interference with pollution control systems.
	1	<ul style="list-style-type: none"> Minor damage to fencing, no evidence of unauthorised access. Remedial work required but has not begun. 		(c) Risk of interference with waste giving rise to detriment to local amenity (odour, birds etc).
	2	<ul style="list-style-type: none"> Easily scaleable fences. 		(d) Risk of fire on site
	3	<ul style="list-style-type: none"> Widespread damage to fencing or gates left unsecured/open while site unmanned. Evidence of unauthorised access/escape of waste. Immediate operator action required to prevent accident/further deposit/escape of waste/vandalism. 		(e) Risk of interference with infrastructure or site equipment leading to later operational failure.

Ref: Licence Condition and WP Guidance :- 3.2 Site security

12	TITLE: Mud and debris on the road Is mud and/or debris from the site being deposited on the highway by vehicles leaving/entering the site? Does the deposit represent a potential danger to those using the highway? Are the deposits in some solid form? What measures does the site operative have for removing such wastes from the highway and are they adequate?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Mud and debris on the road
	0	<ul style="list-style-type: none"> Small quantities of mud outside the site, but difficult to attribute directly to the site rather than other nearby property. Slight discoloration of the road due to mud. 		(a) Danger to passing traffic – stones, chippings, dust, skidding, accidents (b) Inconvenience to local amenities - mud and dust onto pedestrians, properties, vehicles (c) Risk can arise from direct deposit onto public highway or tracking from private road
	1	<ul style="list-style-type: none"> Slight film or light deposits of mud on the highway directly attributable to site operations, no wheelwash available and inspector highlights the problem. 	Consider increasing the score to 3 or the following reasons: houses or pedestrians nearby, if road is dusty or if the site is on a bend in the road.	
	2	<ul style="list-style-type: none"> No score likely. 		
	3	<ul style="list-style-type: none"> Thick film or heavy deposits on road surface. Immediate action needed. Danger to traffic. 	Debris, or staining (e.g. bricks, oil or asbestos), on the highway from operations at the site would always score 3	

Ref: Licence Condition and WP Guidance :- 4.[140] Control of Mud and Debris

13	TITLE: Potentially Polluting Leaks and Spillages Are all necessary steps taken on site to prevent the leakage of liquid fuels? Is there any evidence of leaks? What provision has the site to deal with any potentially polluting leaks? Do all of the relevant staff know what to do in such circumstances?			
Criteria Score	Examples	Notes	Consequence of non-compliance with Potentially Polluting Leaks and Spillages	
0	<ul style="list-style-type: none"> Minor breach of control/containment measures and emergency procedures resulting in identifiable leak or spillage, with remedial measures being taken by the operator. 		(a) Flammability/Explosive (b) Contamination/pollution of land and/or watercourses (c) Pollution of the atmosphere (greenhouse effect)	
1	<ul style="list-style-type: none"> Minor breach of control/containment measures and emergency procedures not resulting in leaks or spills. E.g. lack of materials to clean up spillages or staining near top of bund walls. Evidence of minor leakage or a minor spill where no remedial measures have been taken, by operator. No control/containment measures installed within the agreed period. 			
2	<ul style="list-style-type: none"> Evidence of minor cracks in bund and/or instability. Unbunded fuel tanks with minor spills or leaks. 	May score a 3 if there is imminent risk of environmental pollution or harm to human health.		
3	<ul style="list-style-type: none"> Breach of control/containment measures and emergency procedures resulting in actual leak or spillage, with immediate environmental pollution or harm to human health. 	Always applicable regardless of site location.		

Ref: Licence Condition and WP Guidance :- 4.[151].1-5 Potentially polluting leaks and spillages of waste.

14	TITLE: Fires on Site Most waste management facilities are prevented by the licence from having fires on site. Is there any evidence that waste is being illegally burnt? Are all the relevant staff aware of the position regarding fires on site? If the working plan stipulates what should be done in the case of a fire, do the staff have that knowledge?			
Criteria Score	Examples	Notes	Consequence of non-compliance with Fires on Site	
0	<ul style="list-style-type: none"> Emergency delivery of burning waste to any site, deposited in quarantine area, fire action plans activated and fire extinguished. 	Score 0 to acknowledge appropriate reaction but inspection form should note the occurrence of the event for the record. (Statutory defence)	(a) Production of noxious by-products. (b) Damage to control measures. (c) Damage to site infrastructure. (d) Amenity impact of smoke and particulates (e) Site instability due to creation of voids.	
1	<ul style="list-style-type: none"> Discovery of burning waste at non-landfill site, fire action plans activated and fire put out. Evidence of past fires (ashes on ground) 	Increase score depending on nature of waste and whether accidental or deliberate. (Also whether the Agency notified during or after event)		
2	<ul style="list-style-type: none"> Recent evidence of waste burning in landfill body, fire put out. 	This score is allocated after score 3 given when fire occurred. Continue to score 2 for remainder of quarter unless conclusive evidence that fire extinguished		
3	<ul style="list-style-type: none"> Clear evidence of waste burning in landfill body. 	Score 3 and call fire services		

Ref: Licence Condition and WP Guidance :- 4.[153] Fires on the Site - .1 Prohibition .2 Action Plan

15	TITLE: Waste Acceptance and Control Systems Procedures Only wastes permitted by the site licence should enter the site. Are relevant staff aware of what to do in the case of unacceptable waste entering the site, can they demonstrate the correct action to be taken, according to the licence? Are all relevant staff aware of the procedures and where they are located on site?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Waste Acceptance and Control Systems Procedures
	0	<ul style="list-style-type: none"> ● (non-permitted wastes see inspection criteria waste types and quantities) ● Non-permitted wastes that are inadvertently received at the site are properly identified and quarantined in appropriate storage area prior to removal from the site. 		Wastes stored or handled inappropriately. (a) Incompatible wastes (b) Poor waste sampling practices. (c) Flammability/Explosion
	1	<ul style="list-style-type: none"> ● Non-permitted wastes identified on site storage area by inspector. ● Storage areas for non-special wastes not labelled correctly. 	Would include failure to check duty of care transfer notes, however score higher if failure involves hazardous or polluting wastes eg special waste.	
	2	<ul style="list-style-type: none"> ● Non-special wastes not properly stored in designated areas ● Appropriate checks on acceptance of non-special wastes are not undertaken ● Poor segregation of wastes types that if reacted may cause fires, explosions or generate toxic gases. ● Minor problems relating to non-critical infrastructure where repairs and/or maintenance are already programmed. 	May score a 3 if failure to conform to acceptance, labelling, storage or testing procedures may constitute immediate environmental risk or harm to human health.	
	3	<ul style="list-style-type: none"> ● Unsuitable polluting wastes identified at tip face, definitely discarded. ● Appropriate checks on acceptance of special wastes are not undertaken. 	May score a 2 if failure to conform to acceptance, labelling, sampling or storage procedures does not constitute environmental risk or harm to human health.	

Ref: Licence Condition and WP Guidance :- 4.[210] . 1-4 Waste acceptance and control procedures
 4.[220] . Waste sampling and testing
 4.[230] . Waste quantity measurement systems
 4.[301] . Storage of [specified wastes]
 4.[410] . [Specified waste treatment process] - process plant and equipment and procedures

16 TITLE Phasing and methods of waste discharge and emplacement If the site is operating a phased infilling policy is this being followed? Are all the relevant site operatives aware of the phased infilling system? Is all waste entering the site being discharged and managed according to the licence condition?			
Criteria Score	Examples	Notes	Consequence of non-compliance with Phasing and methods of waste discharge and emplacement
0	<ul style="list-style-type: none"> Minor non-compliance with licence conditions/ working plan requirements for specified methods of deposit, emplacement or handling of particular waste. Not causing, or having the potential to cause adverse effects on site operations or sensitive receptors offsite, e.g. lack of compaction, width and depth of working face, small quantities in wrong phase/area, filling site in wrong phase order. Working areas not defined. The key point is that these "faults" are so insignificant that they do not require to be corrected or they can be corrected easily and the operator is already doing so without the intercession of the inspector. 	When considering non-compliance with licence conditions/working plan in respect of the phasing of site operations and the discharge/ emplacement/handling of waste, the location of the non-compliance within the site may be an important factor where there are sensitive receptors such as housing nearby.	<p>Potential for pollution or detriment to amenity increased by inappropriate phasing of filling.</p> <p>(a) Amenity/health/ pollution problems due to inappropriate discharge and handling of waste being deposited.</p> <p>(b) Site operational problems due to inappropriate discharge and handling of wastes being deposited.</p>
1	<ul style="list-style-type: none"> As above but the faults are significant to require correction (it should be scored as a 1 if the operator is putting the problems right but if had not been, the inspector would have interceded to ensure that the faults were corrected). 		
2	<ul style="list-style-type: none"> Significant deviations from the requirements of the licence that necessitates the inspector to request work to be done, by the operator, due to the probability of pollution or harm occurring (NB there is no clearly identified source target pathway). 		
3	<ul style="list-style-type: none"> Adverse environment/ health effects on receptors outside the site due to waste emplacement, wastes in wrong place, deviation from order of filling or courses not defined (Clear causal link between the breach of licence conditions and the environmental effects). Adverse environment/ health effects on receptors outside the site due to the discharge of waste in the wrong phase/location (e.g. due to dust/fumes). Clear causal link between the breach of licence conditions and the environmental effects. 		

Ref: Licence Condition and WP Guidance :- 4[520] .1 Waste discharge and emplacement

17	TITLE : Use of daily/Intermediate cover (Landfill Only) Does the licence require the use of daily cover or progressive cover? If so, is it being used effectively and when indicated by the licence? Is appropriate material being used to cover down?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Use of daily/intermediate cover
	0	<ul style="list-style-type: none"> Large area of uncovered waste (deposited today) which can be covered at end of working day. 		Scavengers
	1	<ul style="list-style-type: none"> Patchy progressive coverage of waste through the day and/or at the end of the working day. Large area of uncovered waste (deposited today) that may not be covered by the end of working day. 	Scoring may need to be increased where climatic conditions are poor. Descriptions relate to biodegradable landfills. - Does not relate to placement and grading out of wastes.	(a) Litter (b) Flies (c) Odour (d) Fires (e) Visual appearance
	2	<ul style="list-style-type: none"> Use of unsuitable engineered material as intermediate cover. Integrity of intermediate cover breached. Insufficient cover, however the site is remote, with no obvious target. 	Integrity of intermediate cover eroded exposing asbestos and difficult waste (e.g. powders) disposal. Score 3 where properties nearby.	(f) Uncontrolled aerial releases (g) Potential for contaminated runoff
	3	<ul style="list-style-type: none"> Cover absent from large areas of the deposited waste for more than 1 day. Failure to cover hazardous or special waste as required by the licence. The use of unsuitable wastes as intermediate cover material. 		(h) Infiltration.

Ref: Licence Condition and WP Guidance :- 4.[521] .1-4 Use of daily and intermediate cover

18

TITLE: Special Wastes

Is the site licensed to accept special wastes? Special wastes like asbestos and batteries must be contained appropriately (as indicated within the licence/working plan), asbestos in lockable skips and vehicle batteries placed in containers (where the licence and/working plan indicates). Ensure the landfilling of asbestos is done according to the licence/working plan, this normally indicates a designated area for disposal, with covering undertaken very soon after. Are staff aware of these measures?

Criteria Score	Examples	Notes	Consequence of non-compliance with Special Wastes
0	<ul style="list-style-type: none"> Unable to supply some consignments notes, or other special waste related info at the time of asking, however, operator will provide in a period not exceeding 7 days. (if next inspection is not before 7 days, officer to check that info has been received) 		Inadequate control over the storage and handling of hazardous waste.
1	<ul style="list-style-type: none"> Failure to keep consignment notes recording details of special waste received at the site office. (if consignment notes are not kept at all this would be an offence under the Special Waste Regs) 		(a) Deposit of hazardous waste in a way that may compromise the landfill design principles with respect to preventing pollution.
2	<ul style="list-style-type: none"> Failure to keep adequate records of the locations of deposits of special waste in a landfill site <ul style="list-style-type: none"> (i) Example: Location of special waste not marked on a grid and shown in relation to site contours. (ii) Example: Deposits not described by reference to the register of consignment notes (does not apply to deposit at site of production.) (iii) Example: Failure to record quantity, composition and date of disposal of special waste delivered by pipeline or deposited at site of production. 		(b) Inability to assess the surrender of licence against completion criteria.
3	<ul style="list-style-type: none"> Failure to comply with the extra control requirements imposed by the working plan. Examples: requirements for extra containment, segregation and physical separation from other wastes, rigorous tracking requirements for certain wastes, rigorous limits on storage times, control of the temperature of certain wastes, deep burial and damping down. 		

Ref: Licence Condition and WP Guidance :- 7.[200] Recording special waste deposits
 4.[301] Storage of [specified wastes]
 4.[520] Waste Discharge and Emplacement
 Special Waste Regulations 1996, regulation 15 and 16

19	TITLE: Landfill gas monitoring and reporting system (external to the waste and/or engineered containment) (Landfill Only) [It is assumed background monitoring taken prior to licensing, hence this criteria not relevant to Pre-Operational phase of site] Is monitoring being undertaken? If so, is it as the agreed frequency? Are monitoring reports/data available? Is the reporting as agreed in the licence/working plan?		
	Criteria Score	Examples	Notes
	0	<ul style="list-style-type: none"> Monitoring and reporting generally acceptable but there is some missing data or late reporting, due to unavoidable circumstances. Problem being rectified by the operator. 	
	1	<ul style="list-style-type: none"> Monitoring and reporting generally acceptable but there is some missing data or late reporting, no action being taken by the operator. Deposit of waste in a new cell or phase before the Agency has given consent to Monitoring System Construction Quality Assurance Plan. Prolonged failure to report the monitoring data to the Agency as required by licence condition, with no data available for inspection. Data not obtained in accordance with methods agreed in licence and/or working plan. [from OPRA of Monitoring Scheme] 	If no data has ever been reported, then location of the site may suggest the risk is great enough to be scored up to 3.
	2	<ul style="list-style-type: none"> Data reported gives rise to concerns about reliability. [from OPRA of Monitoring Scheme] 	Depends on location of site, gas control history, current gas control situation.
	3	<ul style="list-style-type: none"> Failure to monitor crucial locations. Failure to implement action plan in event of trigger levels being exceeded. Consistent refusal to supply data, or access to data, where site located in a sensitive location. 	

Ref: Licence Condition and WP Guidance :- 5.[101] .1-9 Landfill gas monitoring and reporting external to the [waste] [engineered containment]

20	TITLE: Monitoring of landfill gas within the site (within the waste or engineered containment) A monitoring plan provided by the operative and agreed by the Agency will normally determine the frequency of monitoring. Is this being adhered to? Are the results available for inspection, if elevated levels of gas are indicated are the determined and appropriate actions undertaken by the site staff?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Monitoring of landfill gas within the site
	0	<ul style="list-style-type: none"> Monitoring and reporting generally acceptable but there is some missing data or late reporting, due to unavoidable circumstances. Problem being rectified by the operator. 		a) Failure to identify trends in gas production.
	1	<ul style="list-style-type: none"> Monitoring and reporting generally acceptable but there is some missing data or late reporting, no action being taken Adequate gas monitoring outside of the waste but no monitoring of gas within the waste. Prolonged failure to report the monitoring data to the Agency as required by licence condition. Data not obtained in accordance with methods agreed in licence and/or working plan. 	If no data has ever been reported, then location of the site may suggest the risk is great enough to be scored up to 3.	b) Lack of information about the stabilisation of the waste body. c) Failure to implement adequate or improve gas control measures.
	2	<ul style="list-style-type: none"> Data reported gives rise to concerns about reliability. No Agency agreed landfill gas monitoring programme. 		d) Due to the a), b) and c) above:
	3	<ul style="list-style-type: none"> No monitoring of gas within the waste together with identification of problems outside of waste. Failure to monitor crucial locations. Failure to implement action plan in event of trigger levels being exceeded. Consistent refusal to supply data, or access to data where site is located in sensitive locations. 		<ul style="list-style-type: none"> ● Risk to health and safety of residents ● Risk to flora ● Risk to property Inability to assess the surrender of licence against completion criteria.

Ref: Licence Condition and WP Guidance :- 5.[100] . 1-3 Landfill gas monitoring and reporting within the [waste][and][engineered containment]

21	TITLE: Leachate Monitoring Reporting (Landfill Only) [It is assumed background monitoring taken prior to licensing, hence this criteria not relevant to Pre-Operational phase of site] Is monitoring being audited? If so, is it as the agreed frequency? Are monitoring reports/data available? Is the reporting as agreed in the licence/working plan?)			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Leachate Monitoring Reporting
	0	<ul style="list-style-type: none"> Monitoring and reporting generally acceptable but there is some missing data or late reporting, due to unavoidable circumstances. Problem being rectified by the operator. 	Only where there is no risk of environmental pollution or harm to human health.	(a) Unable to assess impact on environment. (b) Environment Agency unable to advise on or supply monitoring results.
	1	<ul style="list-style-type: none"> Monitoring and reporting generally acceptable but there is some missing data or late reporting, no remedial action taken. Reported data parameters do not conform to requirements of licence/working plan. Refusal to give inspector access to monitoring data on demand. 	If no data has ever been reported, then location of the site may suggest the risk is great enough to be scored up to 3.	
	2	<ul style="list-style-type: none"> No Agency agreed leachate monitoring plan or programme. Leachate monitoring undertaken, results indicate minor problems but no corrective action has been taken. (from OPRA for Monitoring) 	May score 3 if non-compliance is likely to give rise to a serious environmental risk or harm to human health	
	3	<ul style="list-style-type: none"> Leachate monitoring results indicate serious problems. (from OPRA for Monitoring) 		

Ref: Licence Condition and WP Guidance :- 5.[200]. Leachate monitoring and reporting
 1-2 Leachate monitoring and sampling programme + records
 4-5 Reference elevations for leachate level monitoring points

22

TITLE: Ground water quality monitoring and reporting

[It is assumed background monitoring taken prior to licensing, hence this criteria not relevant to Pre-Operational phase of site] (e.g. Is monitoring being audited? If so, is it as the agreed frequency? Are monitoring reports/data available? Is the reporting as agreed in the licence/working plan?

Criteria Score	Examples	Notes	Consequence of non-compliance with Ground water quality monitoring and reporting
0	<ul style="list-style-type: none"> Monitoring and reporting generally acceptable but there is some missing data or late reporting, due to unavoidable circumstances. Problem being rectified by the operator. 		(a) Failure to demonstrate adequacy of groundwater protection measures.
1	<ul style="list-style-type: none"> Monitoring and reporting generally acceptable but there is some missing data or late reporting, no remedial action taken. Deposit of waste in a new cell or phase before the Agency has given consent to Monitoring System Construction Quality Assurance Plan. Prolonged failure to report the monitoring data to the Agency as required by licence condition. Data not obtained in accordance with methods agreed in licence and/or working plan. (from OPRA for Monitoring). 	If no data has ever been reported, then location of the site may suggest the risk is great enough to be scored up to 3.	(b) Inability to assess compliance with standards in regulation to regulation 15. (c) Inability to assess impact of the site on groundwater quality. (d) Inability to assess the surrender of licence against completion criteria.
2	<ul style="list-style-type: none"> No agency agreed groundwater monitoring plan or programme. Data reported gives rise to concerns about reliability. 	In all cases, score dependant on status and sensitivity of ground waters. If of high quality then score may be elevated. If ground waters are of low value and breach insignificant then score 1. Evidence of Reg. 15 List I or II substances score 3 and activate action plan.	
3	<ul style="list-style-type: none"> Failure to implement action plan in event of trigger levels being exceeded. Consistent refusal to supply data, or access to data where site is located in sensitive locations. 		

Ref: Licence Condition and WP Guidance :- 5.[400] 1-6 Groundwater Monitoring and Reporting Systems

23	TITLE: Surface Water Quality Monitoring & Reporting [It is assumed background monitoring taken prior to licensing, hence this criteria not relevant to Pre-Operational phase of site] Is monitoring being audited? If so, is it as the agreed frequency? Are monitoring reports/data available? Is the reporting as agreed in the licence/working plan?		
Criteria Score	Examples	Notes	Consequence of non-compliance with Surface water quality monitoring and reporting
0	<ul style="list-style-type: none"> Monitoring and reporting generally acceptable but there is some missing data or late reporting, due to unavoidable circumstances. Problem being rectified by the operator. 		(a) Pollution of surface waters and/or groundwater. (b) Environmental impact on flora and fauna. (c) Harm to human health where polluted water is abstracted. (d) Harm to health of animals from polluted drinking water.
1	<ul style="list-style-type: none"> Monitoring and reporting generally acceptable but there is some missing data or late reporting, no action being taken. Monitoring data not available for inspection on demand. Reported data parameters do not conform to requirements of licence/working plan. Failure to test water intended for discharge to a water course as required by the licence/working plan but not leading to pollution of water external to the site. 	If no data has ever been reported, then location of the site may suggest the risk is great enough to be scored up to 3.	
2	<ul style="list-style-type: none"> Refusal to undertake a scheduled sampling programme. Monitoring results indicate minor problems but no corrective action has been taken. 		
3	<ul style="list-style-type: none"> Failure to test water intended for discharge to a water course as required by the licence/working plan leading to pollution outside the site. Refusal to undertake any sampling programmes. Consistent refusal to allow access to monitoring data, where site is located in sensitive locations. Monitoring results indicate serious problems. (from OPRA for Monitoring) 		

Ref: Licence Condition and WP Guidance :- S.[500] . 1-5 Surface water quality and reporting systems

24 TITLE Control, monitoring and reporting of dusts, fibres and particulates Does the site have dust control measures? Adequate measures must be employed to control dust etc. Are the control measures being used appropriately?			
Criteria Score	Examples	Notes	Consequence of non-compliance with Control, monitoring and reporting of dusts, fibres and particulates
0	<ul style="list-style-type: none"> ● Delay of < 1 week in submitting monitoring results required by the licence when there is no known problem with dust/fibre/particulate migration outside the site. ● Minor arisings of dust from general site operations (e.g. working area, roads) during periods of dry weather, but operator has taken such steps that it does not affect areas outside the site. 		(a) Actual or potential adverse health, amenity and pollution effects outside the site. (b) Potential explosion hazard within the site.
1	<ul style="list-style-type: none"> ● Failure to carry out monitoring at frequency specified in the licence. ● Delay of 1 cycle in submitting monitoring results required by the licence when there is no known problem with dust/fibre/particulate migration outside the site. 	Where dust etc becomes deposited on the surface of the site away from the operational area the possibility of it later becoming windblown and affecting areas outside the site boundary should be taken into account.	
2	<ul style="list-style-type: none"> ● Failure to carry out any monitoring. ● Arisings of dust from general site operations (e.g. working area, roads) during periods of dry weather, affecting areas outside the site, but currently causing no pollution/harmful effects. 		
3	<ul style="list-style-type: none"> ● Failure to adequately contain wastes or take action during deposit of dusty/fibrous wastes or other site operations giving rise to a risk of adverse pollution/ health/amenity effects outside the site. ● Delay in submitting monitoring results required by the licence when there is a known problem with dust/fibre/particulate migration outside the site. 		

Ref: Licence Condition and WP Guidance :- 6.[010] . 1-7 Control, monitoring and reporting of dusts, fibres and particulates

25	TITLE Control of Odours What measures are available on site to control odours? If stipulated in the licence/working plan they must be adequate and adhered to. Are staff aware of them? Are, or have external odour control measures been employed?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Control of Odours
	0	<ul style="list-style-type: none"> ● Smell from recently deposited non-hazardous waste within site boundary, but being addressed by the operator. ● Minor malodours contained within site boundary. 	Score may need to be increased in adverse climatic conditions. Assessment of the degree and effectiveness of odour is subjective. Odour complaints may be indicative of inefficiency of landfill gas collection system, leachate controls and treatment; fugitive releases from waste treatment, excavation of deposited waste mass.	Complaint of detriment to amenity (a) Harm to human health from fugitive releases
	1	<ul style="list-style-type: none"> ● One off loads of odorous wastes not handled in compliance with licence/ working plan. ● Minor malodours detected at site boundary only. 		
	2	<ul style="list-style-type: none"> ● No odour control systems in place, site in sensitive location. 		
	3	<ul style="list-style-type: none"> ● Significant quantity (many loads) of odorous waste not handled in compliance with licence/working plan. ● Malodours detected beyond site boundary resulting in complaints. 		

Ref: Licence Condition and WP Guidance :- 6.[020] . 1-3 Control of odours

26	TITLE: Control and monitoring of noise What measures are available on site to control noise? If stipulated in the licence/working plan they must be adequate and adhered to. Are staff aware of them?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Control and monitoring of noise
	0	<ul style="list-style-type: none"> ● Noise from normal daytime operations within acceptable limits. 		(a) Pollution of the environment, harm to human health and detriment to the amenity, from noise attributable to the site operations. (b) Risk to sensitive targets beyond site boundary, not controlled by either planning condition or licence condition.
	1	<ul style="list-style-type: none"> ● Excessive noise occasionally detected by inspectors, but no complaints received. 		
	2	<ul style="list-style-type: none"> ● Failure to take measures specified in the working plan to prevent or contain noise. ● Noise levels, beyond the site boundary, in excess of levels set to control and long term harm. 	There may be particularly sensitive, site specific, receptors which would suggest these examples score 3	
	3	<ul style="list-style-type: none"> ● Excessive noise problems substantiated, followed by complaints 		

Ref: Licence Condition and WP Guidance:- 6.[030].1-2 Control of Noise

27	TITLE: Control of pests Are measures available on site to control pests in accordance with the licence/WP? Are measures specified in the licence? Are appropriate pest control measures being employed?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Control of pests
	0	<ul style="list-style-type: none"> Minor occurrences of pests, being monitored and, where necessary, control measures being employed by the operator. No evidence off-site of pests associated with site operations. 		(a) Risk of infestation. (b) Risk of infection or disease. (c) Risk to local amenity.
	1	<ul style="list-style-type: none"> Evidence of infestation, but no evidence of infestation spreading off-site. Operator required to employ pest control measures to eliminate minor infestation. 		
	2	<ul style="list-style-type: none"> Evidence of an infestation that could have health effects for site neighbours if operator does not take required action. 		
	3	<ul style="list-style-type: none"> Actual infestation observed. Operator has failed to take controlling measures. Infestation has spread to adjacent properties with potential for immediate health problems. 		

Ref; Condition and Guidance : 6.[040].1- Control of Pest infestations.

28	TITLE: Control of birds and other scavengers What methods are being employed by the site operatives to alleviate the nuisance of birds and other scavengers, and are they adequate? Does the licence specify what measures are to be taken? Are these conditions being adhered to? What facilities are installed to prevent waste being removed from the site by birds or scavengers?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Control of birds and other scavengers
	0	<ul style="list-style-type: none"> Small numbers of birds on site but not scavenging. 		(a) Harm to human health and serious detriment to the amenities of the locality.
	1	<ul style="list-style-type: none"> Evidence of scavenging e.g. disturbed waste but no evidence of waste being removed from site. Operator not employing control measures in accordance with the licence and W/P but only minor evidence of scavengers. 		(b) Compromising identified air protection zones e.g. airports.
	2	<ul style="list-style-type: none"> Operator not employing control measures in accordance with the licence and W/P and increasing numbers of scavengers observed on site. 		
	3	<ul style="list-style-type: none"> Widespread scavenging observed/has taken place and waste is being or has been removed from the site. 	Significant pathways and receptors may be identified for site e.g. scavenging birds roosting at nearby drinking water supply.	

Ref; Condition and Guidance : 6.[041] Control of scavenging birds or other scavengers

29	TITLE: Control of Litter Are adequate litter measures available and are they implemented to prevent the escape of any wind blown litter? If litter has escaped are staff instructed to collect it?		
Criteria Score	Examples	Notes	Consequence of non-compliance with Control of Litter
0	<ul style="list-style-type: none"> ● Odd bits of litter confined to the site, situation being addressed. 		(a) Detriment to amenity
1	<ul style="list-style-type: none"> ● Minor damage to litter control equipment. ● Minimal quantity of litter evident off site but no remedial measures being actioned. ● Minimal quantity of litter evident from a previous inspection that has still not been collected in accordance with licence/working plan. 		
2	<ul style="list-style-type: none"> ● No required measures installed to adequately deal with litter (eg mobile screens or litter fencing) ● Litter measures installed are inadequate or damaged to an extent that they are ineffective. 		
3	<ul style="list-style-type: none"> ● Significant/large quantities of litter evident off site. 	Would include sensitive receptors such as a busy main road, residential dwellings and/or a school outside the site boundary. The level of litter is such that it represents a serious deterioration of local amenity or a risk to road users by reducing visibility and hence, becomes potentially life threatening.	

Ref: Licence Condition and WP Guidance :- 6.[050] . 1-7 Control of litter

30	TITLE: Record of Specified events The site licence may determine the necessity for recording certain events. If this is so, is the operator keeping a diary, or any other form of documented records of events such as significant mechanical breakdowns, shortage of operational staff, significant events on the site e.g. a leakage of leachate or fuel oil			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Record of Specified events
	0	<ul style="list-style-type: none"> Delay in entering details < 7 days, however record has been, or is being made. 		(a) Failure to record specific events or incidents etc. may be indicative of 'poor management'. Long term persistent 'poor management' which would otherwise go unrecorded could have unforeseen long-term consequences, including failures in environmental controls. (b) Lack of auditable site management records.
	1	<ul style="list-style-type: none"> Failure to record specific events, which are then entered by the operator following action required by the inspector, e.g. attendance by technically competent manager, record of environmental monitoring visits, waste returns etc. 	Unlikely to ever score more than 1 due to not having direct environmental consequences.	
	2	<ul style="list-style-type: none"> Failure to record 'critical' specified events, e.g. special waste deposits, machinery breakdown, extremes of weather, accidents involving waste spillage's or other form of waste escape. 	Failure to record specific incidents which would otherwise go unrecorded and could have unforeseen long term consequences.	
	3	<ul style="list-style-type: none"> Failure to record and inform the Agency of one or a number of significant events resulting in environmental pollution or harm to health. 	A score of 3 is likely only to be used in exceptional circumstances.	

Ref: Licence Condition and WP Guidance:-

- 7.[100] Security and availability of Records
- 7.[200] Record of Special waste deposits
- 7.[300] Records of waste movements
- 7.[400] Site diary

31	TITLE: Site Surface Water Management Systems – Impermeable Pavements and Sealed Drainage Systems (Non-Landfill Only) Surface water from a waste management facility, in most cases, should not be permitted to run directly into a watercourse. Is site surface water being managed/controlled as indicated in the licence/working plan? Where a drainage system is installed, is it as agreed by the Agency? Is it adequate to deal with the volume of water on site?		
Criteria Score	Examples	Notes	Consequence of non-compliance with Site Surface Water Management Systems – Impermeable Pavements and Sealed Drainage Systems
0	<ul style="list-style-type: none"> ● Necessary minor repairs and maintenance already carried out. 		(a) Pollution of surface waters and/or groundwater. (b) Environmental impact on flora and fauna. (c) Harm to human health where polluted water is abstracted. (d) Harm to health of animals from polluted drinking water.
1	<ul style="list-style-type: none"> ● Infrastructure does not conform to the requirements of the licence/working plan. ● Infrastructure inadequately maintained, e.g. cracked pavement where surface water collects. ● Insufficient control of water ingress into site. ● Inadequate segregation of uncontaminated surface water run-off from contaminated water. All observed by the inspector who required action of the operator to mitigate against potential for minor impact.		
2	<ul style="list-style-type: none"> ● Surface water is being contaminated due to poor maintenance of the drainage system. 		
3	<ul style="list-style-type: none"> ● Polluted water is draining through pavements or is escaping from drainage, resulting in pollution. ● Oil interceptors leaking resulting in pollution. 		

Ref: Licence Condition and WP Guidance :- 2.[210] . 1-4 Engineered site containment and drainage systems

32	TITLE Engineered containment for storage of liquids, sludges or powders in above-ground tanks The container must be constructed of suitable material, and must not leak. It must be of appropriate size to deal adequately with any liquid contents it may receive. If the licence specifies certain criteria for liquid containment is this being adhered to?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Engineered containment for storage of liquids, sludges or powders in above-ground tanks
	0	● Minor accumulation of rainwater, or other liquid, within the bund reducing free volume below 110% of tank capacity. Removal in progress.		(a) Pollution of ground or surface waters due to ineffective bund allowing tank contents to escape. (b) Aerial emissions from volatile tank contents.
	1	● Signs of minor leaks/drips within the bund with no evidence of migration outside the bund or base within the bund. Work being undertaken to prevent any further leaks. ● Bunding/location of valves, pipework etc not as required by the licence or working plan (e.g. size, material of construction) but not preventing it being effective. Remedial measures are in progress. ● Impermeable pavement not meeting required specification due to accidental damage, repairs currently in progress. ● Storage of materials (e.g. drums) in a bund reducing its effectiveness by reducing free volume below 110% of tank capacity.	The potential environment, health and amenity effects of the tank contents and its location in respect of occupied premises, watercourses etc will need to be taken into account.	
	2	● Bund walls/floor leaking and not maintained adequately following accidents, or other mishaps, to a degree likely to reduce its effectiveness. ● Impermeable pavement not meeting required specification due to damage. ● Failure to properly maintain/secure valves, or pipework within a bund.	Examples would score a 3 if spillage or escape of materials resulted in an immediate threat of environmental pollution or harm to health.	
	3	● Major accumulation of rainwater, or other liquid or materials, within the bund significantly reducing or eliminating free volume. ● Bunding/location of valves, pipework etc not as required by the licence, or working plan (e.g. size, material of construction) seriously compromising its effectiveness. ● Bund walls/floor not maintained adequately following accidents etc, making it completely ineffective. ● Failure to maintain/secure valves, or pipework outside a bund. ● The inappropriate storage, together, of incompatible wastes.		

Ref: Licence Condition and WP Guidance :- 2.[210] . 1-4 Engineered site containment and drainage systems

33

TITLE Engineered containment for liquids, sludges or powders in drums or other mobile containers (Non Landfill Only)

The container must be constructed of suitable material, and must not leak. It must be of appropriate size to deal adequately with any liquid contents it may receive. If the licence specifies certain criteria for liquid containment is this being adhered to?

Criteria Score	Examples	Notes	Consequence of non-compliance with Engineered containment for liquids, sludge's or powders in drums or other mobile containers
0	<ul style="list-style-type: none"> ● Minor accumulation of rainwater, or other liquid, within the bund reducing free volume such that it is close to reducing the 110% of tank capacity. Removal in progress. 		(a) Contamination of ground and surface waters.
1	<ul style="list-style-type: none"> ● Bund not as required by the licence or working plan (e.g. size, material of construction) but not preventing it being effective. ● Storage of too many drums/containers, or other items within the bund reducing its effectiveness by lowering the free volume below that required by the licence. ● Signs of minor leaks/drips within the bund with no evidence of migration outside the bund or base within the bund. Work being undertaken to prevent any further leaks/drips. 	The potential environment, health and amenity effects of the contents of the drums, or other containers and their location in respect of occupied premises, watercourses etc will need to be taken into account.	(b) Aerial emissions from drums or other mobile containers.
2	<ul style="list-style-type: none"> ● Bund walls/floor leaking and not maintained adequately following accidents, or other mishaps, to a degree likely to reduce its effectiveness. ● Failure to retain filling hoses etc within the bund, or as otherwise required by the licence, when not in use. 	Examples would score a 3 if spillage or escape of materials resulted in an immediate threat of environmental pollution or harm to health.	
3	<ul style="list-style-type: none"> ● Major accumulation of rainwater, or other liquid, within the bund significantly reducing free volume. ● Bund not as required by the licence/working plan (e.g. size, material of construction) preventing it being effective. ● Containment system not maintained adequately following accidents etc, making it completely ineffective as the leakage has a target of a stream or surface water drain or soakaway. ● The inappropriate storage, together, of incompatible wastes. 		

Ref: Licence Condition and WP Guidance :- 2.[210]. 1-4 Engineered site containment and drainage systems

34	TITLE: Clinical Waste (Mobile Plant) (Mobile Plant Only) Are the operational staff aware of the permitted operations of the facility? Is the facility being operated in accordance with its licence conditions? Is permitted waste being stored in acceptable quantities? Are there any odour or pest problems associated with the operations? If so are they being addressed adequately?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Clinical Waste (Mobile Plant)
	0	<ul style="list-style-type: none"> Minor deviations from the licence/generic working plan/local working plan, e.g. small quantities of non-permitted waste dealt with/removed by the operator, with no impact. 		(a) Risk to human health.
	1	<ul style="list-style-type: none"> Small quantities of non-permitted waste which have not been removed. One-off malodorous load, not dealt with. 	Proximity of occupied premises may lead to need to score higher.	
	2	<ul style="list-style-type: none"> Process not operated at specification required in the working plan for temperature, residence, time etc that may lead to problems either on the site where the plant is situated or at subsequent sites where the treated material will be taken. 		
	3	<ul style="list-style-type: none"> Waste awaiting processing is not contained/secured. Possible infestation. Waste is being stockpiled whilst plant is down. Odours detected beyond the immediate area where the plant is located. 		

Ref: Licence Condition and WP Guidance :- Volume 3 D4 4.[706] Clinical Wastes

35	TITLE: Plant Containment Systems – Impermeable Pavements and Sealed Drainage Systems (Mobile Plant Only) Surface water from a waste management facility, in most cases, should not be permitted to run directly into a watercourse. Is site surface water being managed/controlled as indicated in the licence/working plan? Where a drainage system is installed, is it as agreed by the Agency? Is it adequate to deal with the volume of water contained?			
	Criteria Score	Examples	Notes	Consequence of non-compliance with Plant Containment Systems – Impermeable Pavements and Sealed Drainage Systems
	0	<ul style="list-style-type: none">● Necessary minor repairs and maintenance being carried out.		(a) Pollution of surface waters and/or groundwater. (b) Environmental impact on flora and fauna. (c) Harm to human health where polluted water is abstracted. (d) Harm to health of animals from polluted drinking water.
	1	<ul style="list-style-type: none">● Infrastructure does not conform to the requirements of the licence/working plan.● Infrastructure inadequately maintained, e.g. cracked pavement where surface water collects.● Insufficient control of water ingress into site.● Inadequate segregation of uncontaminated surface water run-off from contaminated water. <p>All requiring action by the operator to mitigate against potential for minor impact</p>		
	2	<ul style="list-style-type: none">● Contained surface water is being contaminated due to poor maintenance of the drainage system.		
	3	<ul style="list-style-type: none">● Polluted water is draining through pavements or is escaping from drainage.● Oil interceptors leaking and causing pollution of controlled waters.		

Ref: Licence Condition and WP Guidance :- Volume 3 D4 2.[210] Plant and Process Containment Systems

The individuals named below are the Regional representatives that sit on the National Waste Group Enforcement Working Group (NWGEWG).

The named individuals are responsible for the production of the Inspection Methodology Paper and the associated Inspection Forms.

This document was agreed and signed -off by the National Waste Group (NWG) on the 3rd February 2000.

If you have any comments on, or queries regarding the Inspection Forms or the Methodology document please contact the appropriate regional individual.

ANGLIAN	Donald Thomas
MIDLANDS	Cormac Quigley
NORTH EAST	Mike Hibbert
NORTH WEST	Howard Thorp
SOUTHERN	Anne Eggleton
SOUTH WEST	Kevan Davies
THAMES	Bruce Dixon
WALES	Richard Bernhardt.

WME 1 Site inspection report for licensed landfill waste management facilities (operator copy)

Report ID number


**ENVIRONMENT
AGENCY**
Site inspection report page of
for licensed landfill waste management facilities

Environmental Protection Act 1990

Name of site (1) Name of site operator/licence holder (2) WML number (3)
 Name of officer(s) (4) Date (5) Time in (6) out
 Area office (7) Weather conditions (8)
 (9) Type of site: Co-disposal HCL Household Industrial (factory curtilage) Inert Other
 (10) Type of inspection: Routine Audit Out of hours Monitoring Incident response Engineering
 (11) Site operational status: Receiving waste Not receiving waste (12) Site life status: Operational Pre-operational Post-operational

Site areas/phase inspected (13) Report to Environment Agency manager (14)
 Inspection results NI not inspected NA not applicable 0=compliant 1-3=non-compliant
 (15) 1 Specified operations 18 Special wastes
 2 Waste types and quantities 19 Landfill gas monitoring and reporting systems
 3 Staff understanding of licence/working plan 20 Monitoring of landfill gas within the site
 4 Surface preparation-unengineered sites 21 Leachate monitoring reporting
 5 Engineered landfill containment systems 22 Groundwater quality monitoring and reporting
 6 Leachate management and monitoring systems 23 Surface water quality monitoring & reporting
 7 Landfill gas management systems 24 Control, monitoring and reporting of dusts, fibres and particulates
 8 Surface water management system 25 Control of odours
 9 Installation, maintenance and protection of final cap 26 Control and monitoring of noise
 10 Site identification board 27 Control of pests
 11 Site security 28 Control of birds and other scavengers
 12 Mud and debris on the road 29 Control of litter
 13 Potentially polluting leaks and spillages 30 Record of specified events
 14 Fires on site 32 Engineered containment for storage of liquids, sludges or powders in above-ground tanks
 15 Waste acceptance and control systems procedures
 16 Phasing & methods of waste discharge & emplacement
 17 Use of daily and intermediate cover

(16) Samples/measurements/photos taken
 Surface water Groundwater Leachate Gas Waste Other non-compliance Engineering
 Comments/actions (17)

(18) Letter requested (19) Continuation sheet?
 Officer's signature (20) Site operator/licence holder's signature (21) Name & position
 please sign each page to confirm you have received a copy of this form

WME 2 Site inspection report for licensed waste management facilities (operator copy)

Report ID number


**ENVIRONMENT
AGENCY**
Site inspection report page of
for licensed waste management facilities

Environmental Protection Act 1990

Name of site (1) _____ Name of site operator/licence holder (2) _____ WML number (3) _____
 Name of officer(s) (4) _____ Date (5) _____ Time in (6) _____ out _____
 Area office (7) _____ Weather conditions (8) _____
 (9) Type of site: Special waste transfer station Civic amenity HCL transfer station Metal recycling Treatment plant
 Inert transfer station Pet cemeteries Incinerators In-house storage
 (10) Type of inspection: Routine Audit Out of hours Monitoring Incident response Engineering
 (11) Site operational status: Receiving waste Not receiving waste (12) Site life status: Operational Pre-operational Post-operational
 Site areas/phase inspected (13) _____ Report to Environment Agency manager (14) _____

(15) Inspection results NI not inspected NA not applicable 0=compliant 1-3=non-compliant
 1 Specified operations 25 Control of odours
 2 Waste types and quantities 26 Control and monitoring of noise
 3 Staff understanding of licence/working plan 27 Control of pests
 10 Site identification board 29 Control of litter
 11 Site security 30 Record of specified events
 12 Mud and debris on the road 31 Site surface water management systems – impermeable pavements and sealed drainage systems
 13 Potentially polluting leaks and spillages 32 Engineered containment for storage of liquids, sludges or powders in above-ground tanks
 14 Fires on site 33 Engineered containment for liquids, sludges or powders in drums and other mobile containers
 15 Waste acceptance and control systems procedures
 18 Special wastes
 22 Groundwater quality monitoring and reporting
 23 Surface water quality monitoring & reporting
 24 Control, monitoring and reporting of dusts, fibres and particulates

(16) Samples/measurements/photos taken
 Surface water Groundwater Leachate Gas Waste Other non-compliance Engineering

Comments/actions

(17)

(18)

Letter requested

(19)

Continuation sheet?

Officer's signature

(20)

Site operator/licence holder's signature

(21)

Name & position

please sign each page to confirm you have received a copy of this form

WME 3 continuation sheet (operator copy)**Site inspection report page of**

Name of officer

Date

Report identification number

WML number

Comments/actions required

Officer's signature

Site operator/licence holder's signature

Name & position

please sign each page to confirm you have received a copy of this form

Form WME 3

WME 4 Inspection report for mobile plant licensed activities

Report ID number

operator copy = white file copy = yellow Public Register copy = blue


**ENVIRONMENT
AGENCY**
Inspection report
 for mobile plant licensed activities

page of

Environmental Protection Act 1990

Site location		Name of mobile plant / licence holder		WML number	
Name of officer(s)		Date	Time	in	out
Area office		Weather conditions			
Type of plant: <input type="checkbox"/> Incinerator <input type="checkbox"/> Waste oil <input type="checkbox"/> Waste vitrification <input type="checkbox"/> Microwaving clinical waste <input type="checkbox"/> Soil treatment <input type="checkbox"/> Destruction of PCBs/PCTs <input type="checkbox"/> Other facility/process					
Type of inspection: <input type="checkbox"/> Routine <input type="checkbox"/> Audit <input type="checkbox"/> Out of hours <input type="checkbox"/> Monitoring <input type="checkbox"/> Incident response <input type="checkbox"/> Engineering					
Site location status: <input type="checkbox"/> Plant on site <input type="checkbox"/> Plant off site					
Plant status: <input type="checkbox"/> Operational <input type="checkbox"/> Non-operational					
Treatment/process inspected			Report to Environment Agency manager		

Inspection results NI = not inspected NA = not applicable 0 = compliant 1-3 = non-compliant

- | | |
|--|---|
| 1 <input type="checkbox"/> Specified operations
2 <input type="checkbox"/> Waste types and quantities
3 <input type="checkbox"/> Staff understanding of licence/working plan
10 <input type="checkbox"/> Plant/site identification board
11 <input type="checkbox"/> Plant security/site security
13 <input type="checkbox"/> Potentially polluting leaks and spillages
15 <input type="checkbox"/> Waste acceptance and control systems procedures
18 <input type="checkbox"/> Special waste
22 <input type="checkbox"/> Groundwater quality monitoring and reporting
23 <input type="checkbox"/> Surface water quality monitoring & reporting
24 <input type="checkbox"/> Control, monitoring and reporting of dusts, fibres and particulates
25 <input type="checkbox"/> Control of odours/emissions | 26 <input type="checkbox"/> Control and monitoring of noise
27 <input type="checkbox"/> Control of pests
30 <input type="checkbox"/> Record of specified events
33 <input type="checkbox"/> Engineered containment for liquids, sludges or powders in drums and other mobile containers
34 <input type="checkbox"/> Clinical waste
35 <input type="checkbox"/> Plant containment systems - impermeable pavements and sealed drainage systems |
|--|---|

Samples/measurements/photos taken

☐ Surface water ☐ Groundwater ☐ Leachate ☐ Gas ☐ Waste ☐ Other non-compliance

Comments/actions

☐ Letter requested☐ Continuation sheet?

Officer's signature

Mobile plant operator/licence holder's signature

Name & position

please sign each page to confirm you have received a copy of this form


**ENVIRONMENT
AGENCY**
Site inspection report page of
for licensed landfill waste management facilities

Environmental Protection Act 1990

123456

Name of site NE Landfill	Name of site operator/licence holder MR L HOLDER	WML number (12345)
Name of officer(s) E. A. GENT	Date 2/2/2000	Time in 10.00 out 12.00
Area office MIDDLETON	Weather conditions Dry/cool/moderate wind	
Type of site: <input checked="" type="checkbox"/> Co-disposal <input type="checkbox"/> HCI <input type="checkbox"/> Household <input type="checkbox"/> Industrial (factory curtilage) <input type="checkbox"/> Inert <input type="checkbox"/> Other		
Type of inspection: <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Audit <input type="checkbox"/> Out of hours <input type="checkbox"/> Monitoring <input type="checkbox"/> Incident response <input type="checkbox"/> Engineering		
Site operational status: <input checked="" type="checkbox"/> Receiving waste <input type="checkbox"/> Not receiving waste		
Site life status: <input checked="" type="checkbox"/> Operational <input type="checkbox"/> Pre-operational <input type="checkbox"/> Post-operational		
Site areas/phase inspected ALL		
Report to Environment Agency manager E. A. MANN		

SAMPLE ONLY

Inspection results NI not inspected NA not applicable 0=compliant 1-3=non-compliant

1	0	Specified operations	18	0	Special wastes
2	0	Waste types and quantities	19	0	Landfill gas monitoring and reporting systems
3	0	Staff understanding of licence/working plan	20	0	Monitoring of landfill gas within the site
4	N/A	Surface preparation-unengineered sites	21	0	Leachate monitoring reporting
5	N/A	Engineered landfill containment systems	22	N/I	Groundwater quality monitoring and reporting
6	0	Leachate management and monitoring systems	23	N/I	Surface water quality monitoring & reporting
7	3	Landfill gas management systems	24	0	Control, monitoring and reporting of dusts, fibres and particulates
8	/	Surface water management system	25	0	Control of odours
9	0	Installation, maintenance and protection of final cap	26	0	Control and monitoring of noise
10	0	Site identification board	27	0	Control of pests
11	0	Site security	28	/	Control of birds and other scavengers
12	0	Mud and debris on the road	29	1	Control of litter
13	1	Potentially polluting leaks and spillages	30	0	Record of specified events
14	0	Fires on site	32	N/A	Engineered containment for storage of liquids, sludges or powders in above-ground tanks
15	0	Waste acceptance and control systems procedures			
16	/	Phasing & methods of waste discharge & emplacement			
17	1	Use of daily and intermediate cover			

Samples/measurements/photos taken

☐ Surface water ☐ Groundwater ☐ Leachate ☐ Gas ☒ Waste ☒ Other non-compliance ☐ Engineering

Comments/actions

- 7) Following an accident on site this morning, the boreholes in 'X' location have been seriously damaged. Following landfill gas monitoring, it has been established that gas is migrating off site. Have got the operator to contact engineers - will be on site shortly. Will stay on site until they arrive - will continue to monitor gas at local housing some 200 metres away. Will contact residents if gas levels continue to rise. This licence breach may attract a greater score than 3. Condition 2.340.
- 8) Areas of ponded surface water mixing with leachate on the licensed area of the site - this must be addressed (OPRA score 1).
- 13) Evidence of oil outside the oil bund possibly from delivery operation of diesel oil. The contaminated soil needs to be removed. Condition 4.151.
- 16) Road sweepings being deposited on the site surface, away from the operational cell. This has resulted in contaminated run-off. (OPRA score 2). Removal requested.
- 17) There is a lack of daily cover on the operational cell. This has allowed litter to escape into the fields. A machine is on its way (today) to place cover material within the cell. This should help address the problem. Condition 4.521.
- 28) Large number of seagulls scavenging on the site, no control measures (OPRA 1).
- 29) Litter fencing inadequate, repairs to be made when the machine arrives today. A moderate quantity of litter off-site not being addressed. Condition 6.050.
- ☐ Letter requested ☐ Continuation sheet?

Officer's signature

E.A. Gent

Site operator/licence holder's signature

L. Holder

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Name & position

L. Holder - site operator

CONTACTS:

THE ENVIRONMENT AGENCY HEAD OFFICE

Rio House, Waterside Drive, Aztec West, Almondsbury, Bristol BS32 4UD.
Tel: 01454 624 400 Fax: 01454 624 409

www.environment-agency.gov.uk

www.environment-agency.wales.gov.uk

ENVIRONMENT AGENCY REGIONAL OFFICES

ANGLIAN

Kingfisher House
Goldhay Way
Orton Goldhay
Peterborough PE2 5ZR
Tel: 01733 371 811
Fax: 01733 231 840

SOUTHERN

Guildbourne House
Chatsworth Road
Worthing
West Sussex BN11 1LD
Tel: 01903 832 000
Fax: 01903 821 832

MIDLANDS

Sapphire East
550 Streetsbrook Road
Solihull B91 1QT
Tel: 0121 711 2324
Fax: 0121 711 5824

SOUTH WEST

Manley House
Kestrel Way
Exeter EX2 7LQ
Tel: 01392 444 000
Fax: 01392 444 238

NORTH EAST

Rivers House
21 Park Square South
Leeds LS1 2QG
Tel: 0113 244 0191
Fax: 0113 246 1889

THAMES

Kings Meadow House
Kings Meadow Road
Reading RG1 8DQ
Tel: 0118 953 5000
Fax: 0118 950 0388

NORTH WEST

Richard Fairclough House
Knutsford Road
Warrington WA4 1HG
Tel: 01925 653 999
Fax: 01925 415 961

WALES

Rivers House/Plas-yr-Afon
St Mellons Business Park
St Mellons
Cardiff CF3 0EY
Tel: 029 2077 0088
Fax: 029 2079 8555



ENVIRONMENT AGENCY GENERAL ENQUIRY LINE

0845 933 3111

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ENVIRONMENT AGENCY EMERGENCY HOTLINE

0800 80 70 60



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**ENVIRONMENT
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EA: Waste Management - Box 3