



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

| | | | | | |
|----------------------------------------|---------------------------------------------------------------------------------------------|---------------|--------------|------------|-----------------|
| Site | Beddington ERF EPR/GP3305LN | | Permit Ref | GP3305LN | |
| Operator/ Permit holder | Viridor South London Limited | | | | |
| Date | 20/05/2024 | | Time in | | Out |
| What parts of the permit were assessed | Investigation into the incident on 16th October 2023 at Beddington Energy Recovery Facility | | | | |
| Assessment | Report/data review | EPR Activity: | Installation | X | Waste Op |
| | | | | | Water Discharge |
| Recipient's name/position | Environment, Health and Safety (EHS) Manager | | | | |
| Officer's name | John Tollervey | | Date issued | 20/05/2024 | |

Section 1 - Compliance Assessment Summary

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

| Permit Conditions and Compliance Summary | | | Condition(s) breached |
|------------------------------------------------------|------------------------------------------------------|----|-----------------------|
| a) Permitted activities | 1. Specified by permit | N | |
| b) Infrastructure | 1. Engineering for prevention & control of pollution | N | |
| | 2. Closure & decommissioning | N | |
| | 3. Site drainage engineering (clean & foul) | N | |
| | 4. Containment of stored materials | N | |
| | 5. Plant and equipment | N | |
| c) General management | 1. Staff competency/ training | N | |
| | 2. Management system & operating procedures | C3 | 1.1.1 |
| | 3. Materials acceptance | N | |
| | 4. Storage handling, labelling, segregation | N | |
| d) Incident management | 1. Site security | N | |
| | 2. Accident, emergency & incident planning | N | |
| e) Emissions | 1. Air | C3 | 3.3.1 |
| | 2. Land & Groundwater | N | |
| | 3. Surface water | N | |
| | 4. Sewer | N | |
| | 5. Waste | N | |
| f) Amenity | 1. Odour | N | |
| | 2. Noise | N | |
| | 3. Dust/fibres/particulates & litter | N | |
| | 4. Pests, birds & scavengers | N | |
| | 5. Deposits on road | N | |
| g) Monitoring and records, maintenance and reporting | 1. Monitoring of emissions & environment | N | |
| | 2. Records of activity, site diary, journal & events | N | |
| | 3. Maintenance records | N | |
| | 4. Reporting & notification | C3 | 4.3.1 |
| h) Resource efficiency | 1. Efficient use of raw materials | N | |
| | 2. Energy | N | |

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored
MSA, MSB, TCM = Management System condition A, Management System Condition B and Technically Competent Manager condition which are environmental permit conditions from Part 3 of schedule9 EPR (see notes in Section 5/6).

| | | | |
|------------------------------------|---|---------------------------------------------------------------------|----|
| Number of breaches recorded | 3 | Total compliance score (see section 5 for scoring scheme) | 12 |
|------------------------------------|---|---------------------------------------------------------------------|----|

If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- the part(s) of the permit that were assessed (e.g. maintenance, training, combustion plant, etc)
- where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- any non-compliances identified
- any non-compliances with directly applicable legislation
- details of any multiple non-compliances
- information on the compliance score accrued inc. details of suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

CAR form: detailing investigation into the incident on 16th October 2023 at Beddington Energy Recovery Facility.

Background:

On the 17th October 2023, the Environment Agency (EA) received several reports via our National Incident Reporting Service (NIRS) of a potential incident at Beddington Energy Recovery Facility (ERF). The reports all pertained to a visible dark plume coming from the ERF's main stack as well as an associated odour.

The operator of the ERF had not notified the EA of any incidents at the site. The EA contacted the Site Operations Manager at 11:00 on 17th October, who informed the EA that at 23:00 on 16th October 2023 all power supplied by UK Power Network, to the ERF was lost and Island Mode had failed to activate. This resulted in waste smouldering on the grate, which would account for the more visible, darker, plume being reported.

Island mode is the operational state where an electrical system normally connected to the grid is operating in a mode where some or all the installation is isolated from the grid and is operating solely from a standalone turbine generator unit (TGU). Island mode is sometimes called "backup mode".

The Site Operations Manager was informed by the EA that this type of incident should have been reported immediately to the EA, as per permit condition 4.3.1 of Environmental Permit GP3305LN. It was stated that the Site's Environment Health and Safety (EHS) Manager was on leave, and this may have resulted in the failure of the site to notify the EA as required by their environmental permit.

The EA clarified that permit condition 4.3.2 further requires that a Schedule 5 Part A Notification be issued to the EA within 24 hours of the detection of any malfunction, breakdown, or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution.

The Operations Manager said he would ensure the Schedule 5 Part A Notification would be issued within the required timeframe and would include all relevant information required by Schedule 5 of their environmental permit.

At 14:45 on 17th October 2023 an EA Officer attended site at Beddington ERF and met with the Operations Manager to discuss the incident. At this stage the dark plume was still visibly emitting from the ERF's main stack and, although an odour could be detected in and around the Beddington area, this odour could not be substantiated as arising from the ERF itself.

An odour, described as 'burning plastic/chemical', was detected by the EA Officer upwind of the ERF upon arrival at site. It was not detected downwind of the site or whilst the EA Officer was on site.

Schedule 5 Part A Notification:

A Schedule 5 Part A Notification pertaining to the incident was issued at 20:36 on 17th October 2023 via

email in line with permit condition 4.3.2. A covering note was included which stated that all waste had now been removed from the combustion grates of both lines. The operator also committed to update the Schedule 5 with more information over the coming days.

The Schedule 5 Part A provided a description of the incident which had occurred and measures that were taken to mitigate environmental impacts. The Part A stated that UK Power Networks (UKPN) main import/export cable failed causing the combustion process to halt immediately. The facility Emergency Diesel Generator was used to bring the facility offline safely (dissipating pressures and stored energy). The facility was unable to restart without an addition power-source (usually via the UKPN Import).

Waste was on the combustion grate when the failure occurred, which could not be safely removed. The waste smouldered on the combustion grate, and fresh abatement chemicals could not be dosed. During this period flue-gases passed through the bag filters, which are impregnated with hydrated lime and activated carbon, providing some emissions abatement. The flue gas was being released via natural stack draft only due to the induced draft (ID) fan being inoperable. In order to reduce the environmental impact, all waste feeds were ceased, and all combusted wastes were removed from the combustion grates and into the ash discharger as soon as practicable.

The EA contacted the Operations Manager on the 18th October 2023 for an update and to request that Viridor provide an update to their stakeholders regarding the incident, given the amount of public interest that it had attracted.

An email from Viridor on 18th October 2023 at 17:08 stated that, following Viridor's conversation with the EA, they had updated local stakeholders, including their council partner, South London Waste Partnership, and local councillors, regarding the incident and next steps to return the plant to operation. They also stated that they were investigating the cause of the Island Mode failure and would share the outcome of the incident investigation in your Schedule 5 Part B as required by their Environmental Permit.

The ERF was back up and running on 19th October 2023.

Schedule 5 Part B Notification:

A Schedule 5 Part B Notification was issued to the EA by Viridor at 09:54 on 6th December 2023 in line with permit condition 4.2.3. This Notification is intended to provide more detailed information on the matters for notification under Part A and provide details of measures taken, or intended to be taken, to prevent a recurrence of the incident.

Following a review of the Schedule 5 Part B information, the EA arranged a meeting with Viridor to discuss the findings from this review. A meeting was held at Beddington ERF on 22nd January 2024.

At this meeting the EA and Viridor discussed the potential environmental impact that the incident may have had and requested that additional dispersion modelling be carried out to help quantify this.

The potential root cause of the incident was also discussed. Viridor had undertaken an investigation to identify the root cause of the Turbine Generator Unit (TGU) not switching to Island Mode.

The Schedule 5 Part B provided details of the investigation into the potential causes of the Island Mode failure:

High pressure control oil is used in the TGU to drive and manage the main steam inlet valve positions within the system. During an island mode event, from full load, the control valves of the TGU must close very quickly from a high to a very low valve position. This valve movement is required due to the high load rejection bringing the plant down to just 3MWe. This valve movement requires a significant amount of oil flow which is normally supplied via a Nitrogen bladder accumulator which provides a large volume of high pressurised oil when required, this will maintain the system pressure. Following the failure to enter Island Mode an investigation concluded that there was insufficient control oil pressure supplying the system. This was tracked back to the bladder accumulator, and it was found that the nitrogen bladder had insufficient

pressure, so failed to drive the valves into position following the TGU Trip. The accumulator was recharged following the event, but a new replacement unit has now been installed. The existing accumulator will be refurbished to allow site to hold a spare.

During the site visit you provided additional details of measures that you have implemented to prevent recurrence of this type of event. These measures include regular checks of the pressure of the oil used in the TGU, as well as checks of the nitrogen pressure within the bladder accumulators. These checks can only be performed when the plant is offline, but they will be carried out during a planned shutdown and maintenance events. This improvement has been rolled out across Viridor's other UK installations.

Details of the meeting including agenda items, minutes of discussion and associated action was issued to Viridor in a Compliance Assessment Report (CAR) Report ID: GP3305LN/0490469 on 30th January 2024. The actions from this CAR are reproduced below:

1. Please provide an update to your Schedule 5 Part B that includes a reference to the potential release rates and impact of Dioxins, Metals, PCBs, and PAHs, during the incident.
2. Please provide an update to your Schedule 5 Part B that refers to the potential impact that the failure to dose lime and activated carbon could have had during the incident.
3. Please update your Schedule 5 Part B to readdress the impact that failure to inject Urea could have had on NOx emissions given that Abnormal Operation criteria would not have been met.
4. Please carry out revised modelling that includes known parameters from the incident including flow, temperature, relevant meteorological data, and predicted emission release rates.
5. Please confirm that any measures that have been carried to prevent recurrence of this incident are included in your Other Than Normal Operating Conditions (OTNOC) management plan and associated procedures where appropriate.
6. Please update your Schedule 5 Part B and OTNOC Management plan to include details of the additional measures that have been put in place to ensure the oil pressure used in the TGU and nitrogen pressure in the bladder accumulators remains sufficient to allow the plant to enter Island Mode.

These actions were required to be completed along with the submission of a revised Schedule 5 Part B Notification.

Revised Schedule 5 Part B Notification was submitted along with supplementary information provided in Fichtner report: S3191-0030-0001SMN Beddington ERF Black Site Emissions dated 28th March 2024 which addressed actions 1 – 4 listed above.

Actions 5 and 6 were addressed directly by Viridor in the Post submission response against Compliance Assessment Report: GP3305LN/0490469 in the revised Schedule 5 Part B.

The revised Schedule 5 Part B stated that the failed control oil bladder accumulator was installed in 2015 during build. This type of accumulator has a 10-year replacement or 'dispatch for testing' schedule so was considered operational until 2025. Following this incident Viridor have reviewed all preventative maintenance schedules to include these units in checks completed during planned shutdowns.

An engineering bulletin ref: Guidance for maintenance and pressure regulation compliance dated 1st November 2023, from Viridor's Rotating Equipment Engineer has been shared across all of Viridor's ERF facilities.

This bulletin provides details of maintenance activities which are now required to be carried out on bladder accumulators due to the potential for bladder degradation and/or gas leakage which could lead to loss of functionality of the bladder. The bulletin also provides details of pressure regulation compliance requirements for this type of kit.

The maintenance activities that have been introduced include:

- Regular pressure checks within the bladder to be measured. This pressure check is to be carried out to the manufacturers recommended frequency of every 12 months.
- Many sites have a maintenance cycle greater than 12 months it is therefore recommended that the bladder pressure is measured at every opportunity during each outage.
- If the pressure is found to be low, it must be recharged using a specialist bladder pressure measurement and filling equipment.
- The pressure within the bladder must only be measured with the accumulator depressurized otherwise the measurement will show the system pressure not the bladder pressure.
- The specialist bladder pressure measurement and filling equipment should have been supplied by the manufacturer or supplier of the main equipment.
- Detailed records of all accumulators must be created including system location, manufacturer, serial number, and manufactured date.
- Bladder pressure measurement and filling equipment for all accumulators must be located or purchased. his equipment must be stored on logged on site.
- Creation of a Planned Preventative Maintenance (PPM) record to cover the regular inspection and pressure measurement of all accumulator bladders in line with the outage schedule ideally at least every 12 to 18 months.
- Addition of all accumulators to the Pressure Systems Safety Regulations 2000 (PSSR) written schedule to ensure periodic inspection and testing of the accumulator and/or their replacement to ensure compliance with Pressure Equipment Directive requirements.
- Beddington ERF has updated the OTNOC Management plan and associated procedures following lessons learnt from this incident.

Regarding the potential environmental impact that may have resulted from the incident, Fichtner report: S3191-0030-0001SMN dated 28th March 2024 has considered the events that took place on 16th October 2023 and utilised the potential worst case emission factors and pollutant release rates.

The assessment has conservatively used these emission factors to assess the impact on human health using worst case assumptions including:

- complete failure of the flue gas abatement systems.
- that emissions occurred due to burn out of all available waste on both lines totalling 20 tonnes.
- the use of worst-case emissions factors derived from literature.

Where these worst-case assumptions identify impacts could not be assessed as insignificant, more realistic assumptions have been applied to determine a more probable impact.

The more realistic scenario has been considered based on the combustion of 7.7 tonnes of waste during the incident due to a tube leak that was discovered on the Line 2 boiler. When the grate of Line 2 was inspected following the incident, it was found to be covered with mostly unburnt and saturated waste.

The waste from Line 1 remained on the grate and smouldered for up to 20 hours. Viridor estimates that during normal operation there is approximately 10 tonnes of unburnt waste on each grate at any one time;

Following the power outage and loss of combustion air, approximately 7 tonnes of the unburnt waste on Line 1 would have burnt out over the course of the incident and due to the tube leak on Line 2 only 700kg of the waste on the grate of Line 2 would have burnt out over the course of the incident.

The dispersion modelling assessment has concluded that even under the worst-case or screening scenarios, the impact of emissions during the incident can be screened out as 'insignificant' except for:

- annual mean PAHs (as benzo(a)pyrene)
- annual mean dioxins and furans

- daily mean copper
- hourly mean nickel
- 15-minute mean sulphur dioxide.

However, when the most likely pollutant release rates are considered the impacts from copper, nickel, and sulphur dioxide all screen out as insignificant and impacts from PAHs as benzo(a)pyrene, dioxins and furans are not considered to be significant. Fichtner report: S3191-0030-0001SMN dated 28th March 2024 concludes that a significant impact did not occur due to the emissions released during the incident.

The modelling approach undertaken in Fichtner report: S3191-0030-0001SMN is transparent and each step in the assessment process has been explained and justified in detail. Viridor have also supplied the input files used by the Fichtner Consulting Engineer to conduct the modelling included within the report. The EA are satisfied that the approach taken by Fichtner fulfils the requirements of actions 1-4 of CAR form ref: GP3305LN/0490469.

The EA agree with the operator's assessment and are satisfied that no significant pollution is likely to have been caused as a result of the incident.

Compliance Assessment:

Permit condition 1.1.1 of Beddington's Environmental Permit ref: GP3305LN requires that:

"1.1.1 The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and (b) using sufficient competent persons and resources. (c) referenced in schedule 1, table S1.1 (AR1), from 03/12/2023, in accordance with a written other than normal operating conditions (OTNOC) management plan".

The failure of UK Power Networks main import/export cable was a technically unavoidable event. However, during a power failure the site would reasonably be expected to enter Island Mode, continue to maintain combustion control of waste, and effectively abate emissions whilst the power failure is addressed and/or the plant shut down. The power failure that occurred on 16th October 2023 exposed a limitation within Beddington's management system pertaining to the maintenance and associated pressure checks on the bladder accumulator which is a critical piece of kit required for Island Mode activation. Measures have been put in place to prevent recurrence of this type of event.

Having considered the factors above it appears that the root cause of the incident lies with the site's management system that was in place at the time of the incident. This is a breach of permit condition 1.1.1. and has been scored a consolidated CCS cat 3 non-compliance (see Compliance Assessment Summary below)

Several improvements have been made to your management system in response to this incident and we will review these mitigating measures as part of our ongoing regulatory activities.

Permit condition 3.3.1 of Beddington's Environmental Permit ref: GP3305LN requires that:

"3.3.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions".

Following the power loss, and on failure to enter Island Mode on 16th October 2023, the ERF entered an uncontrolled shutdown. During this period waste on the grate continued to smoulder, combustion control was lost, and abatement systems were no longer able to dose activated carbon, lime or urea. You have undertaken an emissions modelling exercise to determine the potential environmental impact

from the incident. Details of this study are included in Fichtner report: S3191-0030-0001SMN and whilst we accept that the modelling exercise provides a conservative assessment, the potential for a minor environmental impact from the incident cannot be ruled out.

Given that failings in the operating procedures prevented the plant from being able to shut down in a controlled manner following the power failure we have scored the potential environmental impact of the incident a CCS cat 3 non-compliance against permit condition 3.3.1.

Permit condition 4.3.1 of Beddington’s Environmental Permit ref: GP3305LN requires that:

“4.3.1 In the event: (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately: (i) inform the Environment Agency”,

Where:

“4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made “immediately”, in which case it may be provided by telephone”.

Failure to notify the EA of the incident detailed above in line with permit condition 4.3.1, using the interpretation in permit condition 4.4.2, is a breach of permit condition 4.3.1 and has been scored a CCS cat 3 non-compliance.

Permit condition 1.1.1 of Beddington’s Environmental Permit ref: GP3305LN requires that:

“1.1.1 The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure, and those drawn to the attention of the operator as a result of complaints; and (b) using sufficient competent persons and resources”.

Having considered the factors above it appears that the root cause of the failure to notify the EA as per permit condition 4.3.1 lies with the site’s management system that was in place at the time of the incident.

This is a breach of permit condition 1.1.1 and has been scored a consolidated CCS cat 3 non-compliance (see Compliance Assessment Summary below).

Action: Please ensure sufficient resources, including the provision of a deputy for critical roles and responsibilities, are in place to ensure compliance with the conditions in your environmental permit.

Compliance Assessment Summary:

- A CCS cat 3 non-compliance has been scored against permit condition 3.3.1 (e1)
- A CCS cat 3 non-compliance has been scored against permit condition 4.3.1 (g4)
- A single consolidated CCS cat 3 non-compliance has been scored against permit condition 1.1.1 (c2)

Section 3- Enforcement Response

Only one of the boxes below should be ticked

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence* and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

*Non-compliance with MSA, MSB & TCM do not constitute an offence but can result in the service of a compliance, suspension and/or revocation notice.

| | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn’t followed. | |
| In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue. | |

We will now consider what enforcement action is appropriate and notify you, referencing this form.

X

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

| Criteria Ref. | CCS Category | Action Required / Advised | Due Date |
|---------------------|--------------|---------------------------|----------|
| See Section 1 above | | | |
| C2 | C3 | See section 2 | ongoing |
| E1 | C3 | See section 2 | ongoing |
| G4 | C3 | See section 2 | ongoing |

Section 5 - Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- advise on corrective actions verbally or in writing
- require you to take specific actions in writing
- issue a notice
- require you to review your procedures or management system
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit condition is an offence* and we may take legal action against you.

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and or suspension or revocation of the permit.
- A civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response for this/these offence(s).

See our Enforcement and Civil Sanctions guidance for further information

**A breach of permit condition MSA, MSB & TCM is not an offence but may result in the service of a notice requiring compliance and/or suspension or revocation of the permit.*

This report does not relieve the site operator of the responsibility to

- ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- ensure you comply with other legislative provisions which may apply.

Non-compliance scores and categories

| CCS category | Description | Score |
|--------------|-----------------------------------------------------------------------------|-------|
| C1 | A non-compliance which could have a major environmental effect | 60 |
| C2 | A non-compliance which could have a significant environmental effect | 31 |
| C3 | A non-compliance which could have a minor environmental effect | 4 |
| C4 | A non-compliance which has no potential environmental effect | 0.1 |

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

MSA, MSB & TCM are conditions inserted into certain permits by Schedule 9 Part 3 EPR

MSA requires operators to manage and operate in accordance with a written management system that identifies and minimises risks of pollution.

MSB requires that the management system must be reviewed, kept up-to-date and a written record kept of this.

TCM requires the submission of technical competence information.

Section 6 – General Information

Data protection notice

The information on this form will be processed by the Environment Agency to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The Environment Agency may also use and/or disclose it in connection with:

- offering/providing you with its literature/services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The Environment Agency may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The Environment Agency will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within 28 days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

A permit holder can challenge any part of the CAR form by writing to the Environment Agency office local to the site within 28 days of receipt. If the issue cannot be resolved by the local office, a permit holder may request an appeal of the regulatory decision by emailing enquiries@environment-agency.gov.uk within 14 days of receipt of the outcome.

If you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the Parliamentary and Health Service Ombudsman phone their helpline on 0345 015 4033.