

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

Site	Wicks Services Limited			Permit Ref	403958		
Operator/ Permit holder	Wicks Services Limited						
Date	20/09/2018			Time in	13:40	Out	14:35
What parts of the permit were assessed	Permitted Area and Activities						
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge	
Recipient's name/position	Andrew Orr- TCM						
Officer's name	Jenny Rockliffe, Will Morgan			Date issued	05/10/2018		

Section 1 - Compliance Assessment Summary

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

Permit Conditions and Compliance Summary**Condition(s) breached**

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

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),**A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored****Number of breaches recorded**

0

Total compliance score
(see section 5 for scoring scheme)

0

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

Section 2 – Compliance Assessment Report Detail

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

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

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

This was a routine site compliance inspection at Wicks Service Limited (the site). Andy Orr, Technical Competent Manager (TCM), was present and assisted us during the site inspection. Hazardous waste regulations were reviewed as part of this inspection and recorded on a waste audit report which should be read in conjunction with this report.

A. PERMITTED ACTIVITIES

A1. Specified by Permit

At the time of inspection there were no un-depolluted End of Life Vehicles (ELVs) awaiting processing or fully Depolluted ELVs awaiting transfer from site. AO explained that the majority of the ELVs accepted onto site originate from domestic sources.

B. INFRASTRUCTURE

b3. Site Drainage Engineering (clean and Foul)

The Permitted area is a concrete pad with sealed drainage to an interceptor, which drains to foul sewer (the site has a consented discharge with United Utilities). The site has recently completed maintenance work on the concrete pad to ensure it remains an impermeable surface.

C. GENERAL MANAGEMENT

C1. Staff Competency/training

AO provides technical competent management for the site. He completed the Level 4 diploma for managing transfer of hazardous waste (4MTSH) in 2014, for his continuing competency (expiry 05/07/2020). AO completed the following units: Transfer of hazardous waste; transfer of Non-Hazardous waste and ELV.

Comment- As you are operating an End of Life Vehicle facility your primary competence qualification is not sufficient to cover this activity. You need to complete a medium risk operator competence for physical treatment (MROC2) primary competence module. Your ELV continuing competency unit is not valid without this primary module.

Action: Complete the relevant primary qualification module to cover the activities you carry out on site. If you are unsure please contact Wamitab for advice and guidance on the correct modules to take.

C2. Management Systems and Operating procedures

The management system was not reviewed as part of this inspection but AO was able to describe, fully, the depollution procedure for the site. A laminated flow chart is provided to the operators to ensure that all steps are followed.

C4. Storage, Handling, Labelling, Segregation

At the time of inspection the waste fluids are stored in double bunded storage tanks located on the hardstanding area with sealed drainage. At the time of inspection there were separate storage containers for: diesel; petrol; oil/brake fluid and water based fluid. The catalytic convertors were stored under cover in IBCs so as not cause piercing to the casing. Batteries were also stored upright, under cover and according to type in acid resistant containers.

G. Monitoring and Records, Maintenance and reporting

G4. Reporting and Notification


Permit condition 4.2.2 – *'Within one month of the end of each year, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous year.'*

As discussed on site and for the avoidance of any doubt your 2017 waste returns for the site were received on the 31/01/2018: within the required deadline. As stated above your permit for this site requires an annual waste return.

Comment- The ELVs which have been fully depolluted on site are normally sent to your nearby non-hazardous waste transfer station (EAWML 57545). Ensure that these waste movements are accompanied by waste transfer notes as this is required when moving waste from one permit to another as part of your duty of care responsibilities.

During the inspection the operator queried whether a depolluted engine should be transferred from site as non-hazardous or hazardous waste due to the residual amount of oil that will always be present in a depolluted engine.

Although the List of Wastes decision could imply that every drop of engine oil must be removed for an Engine to be classified as non-hazardous, in practice, there is likely to be little additional environmental benefit in removing the very small quantity of oil which is likely to remain and the cost to achieve this would be high. Therefore engines must be depolluted as far as reasonably practicable; you must allow the *oil to drain for a minimum of 20 minutes from the engine, or until such time as no visible further draining of oil is occurring.*

 Environment Agency	EPR Compliance Assessment Report	Report ID: 403958/0316190	
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Operator/ Permit	Wicks Services Limited	Date	20/09/2018

Section 3- Enforcement Response	Only one of the boxes below should be ticked
You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.	
Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.	
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.	
We will now consider what enforcement action is appropriate and notify you, referencing this form.	

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required / Advised	Due Date
See Section 1 above			

Section 5 - Compliance notes for the Operator

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

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

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

● We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.

● Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and or suspension or revocation of the permit.

● A civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response for this/these offence(s).

See our Enforcement and Civil Sanctions guidance for further information

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

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

Non-compliance scores and categories

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

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

Section 6 – General Information

Data protection notice

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

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

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

Disclosure of information

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

Customer charter

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

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with the officer's line managers. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 03708 506 506 (Mon to Fri 08.00–18.00) and ask for the Customer Contact team or send an email to enquiries@environment-agency.gov.uk. If you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the [Parliamentary and Health Service Ombudsman](#), phone their helpline on 0345 015 4033.