

**FCC ENVIRONMENT (UK) LIMITED  
(and Subsidiary Companies)**

**Summary of prosecutions and outcomes**

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**WASTE RECYCLING GROUP LIMITED  
(and Subsidiary Companies)**

**Summary of prosecutions and outcomes  
CURRENT CONVICTIONS**

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Name : WRG Waste Services Limited  
 Court : Airdrie Sheriff Court  
 Conviction Date : 10 April 2012  
 Act/Regulation : Pollution Prevention and Control (Scotland) Regulations 2000 and the Pollution Prevention and Control Act 1999.  
 Section (Sub) : Regulation 30(1)(b) as amended of the Pollution Prevention and Control (Scotland) Regulations 2000; and Section 2 of Pollution Prevention and Control Act 1999.  
 Offence : Failure to comply with condition 2.12 of the site's waste management licence PPC/W/20041 (Greengairs) issued the Scottish Environment Protection Agency that "Waste operations shall be carried out so that offensive odours from the Permitted Installation, in the opinion of an authorised SEPA officer, do not become detectable beyond the boundaries of the Permitted Installation" between 7 November 2010 and 16 February 2011.  
 Penalty : £10,500  
 Mitigation : Cooperation and guilty plea.  
 Post Conviction Plan : [TBC]

Name : Waste Recycling Group (Central) Limited  
 Court : Newbury Magistrates Court  
 Conviction Date : 17 January 2011  
 Act/Regulation : (i) Environmental Permitting (England and Wales) Regulations 2007  
 (ii) Pollution Prevention and Control (England and Wales) Regulations 2000  
 Section (Sub) : (i) Regulation 38(2)  
 (ii) Regulation 32(1)(b)  
 Offence : The Court found there to be two charges against the Company, that between 5 June 2008 and 30 June 2008 at Hermitage Farm landfill site, Newbury Berkshire it failed to comply with condition 3.3.5 of the Environmental Permit number BW0240IT by exceeding the limits for methane gas and carbon dioxide in perimeter gas boreholes at the site and failure to comply with condition 1.1.1 of the Environmental Permit by not following the site management system between 27 July 2007 to 5 April 2008 and 6 April 2008 to 1 June 2008.  
 Penalty : £20,000. In addition, Waste Recycling Group (Central) Limited was ordered the pay the Agency's costs in the sum of £8,169.90. A victim surcharge of £15 was also automatically levied.  
 Mitigation : Cooperation and guilty plea.  
 Post Conviction Plan : Post conviction plan approved by EA.

Name : WRG Waste Services Limited  
 Court : Airdrie Sheriff Court  
 Conviction Date : 4 February 2009  
 Act/Regulation : Environmental Protection Act 1990  
 Section (Sub) : Section 33(6)  
 Offence : Failure to comply with condition 6:18 of the site's waste management licence WML/W/00001 issued by Monkland District Council and amended by the Scottish Environment Protection Agency that "all site operations shall be conducted in such a manner as to ensure that they do not give rise to offensive odours as perceived by any authorised person of the

**WASTE RECYCLING GROUP LIMITED  
(and Subsidiary Companies)**

**Summary of prosecutions and outcomes  
CURRENT CONVICTIONS**

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	Scottish Environment Protection Agency, West Region at any point beyond the site boundary" between 29 September 2004 and 13 December 2004 inclusive.
Penalty	: £8,000.
Mitigation	: Cooperation and guilty plea.
Post Conviction Plan	: SEPA confirmed there is no requirement to submit a post conviction plan. A post conviction plan prepared and submitted to the EA, in respect of permits owned by WRG Waste Services Limited in England and Wales.

## **WRG WASTE SERVICES LIMITED**

### **GREENGAIRS LANDFILL SITE - POST- CONVICTION PLAN ("PCP")**

**Company name:** WRG Waste Services Limited

**Company address:** Ground Floor West, 900 Pavilion Drive, Northampton Business Park, Northampton, NN4 7RG.

**Date:** 7 January 2013

#### **1.0 List of offences covered by PCP**

<b>Offence</b>
Failure to comply with condition 2.12 of the site's waste management licence PPC/W/20041 (Greengairs) issued the Scottish Environment Protection Agency that "Waste operations shall be carried out so that offensive odours from the Permitted Installation, in the opinion of an authorised SEPA officer, do not become detectable beyond the boundaries of the Permitted Installation" between 7 November 2010 and 16 February 2011.

<b>When &amp; where</b>	<b>Court</b>	<b>Person convicted</b>	<b>Plea</b>	<b>Date of Conviction</b>	<b>Sentence</b>	<b>Current business relationship</b>
7 November 2010 to 16 February 2011 at Greengairs Landfill Site	Airdrie Sheriffs' Court	WRG Waste Services Limited	Guilty plea.	10 April 2012	Fined £10,500	Operator

#### **2.0 List of Permit to which this PCP relates**

<b>Permit Number</b>	<b>Site</b>
PPC-W-20041	Greengairs Landfill Site

#### **3.0 List of persons / relevant persons to which this PCP relates**

Persons Convicted:
WRG Waste Services Limited

#### **4.0 Circumstances/causes of the Offence**

Please provide details of events which led to the commission of the offence including accountability and any mitigating circumstances you feel are relevant. Continue on a separate sheet if necessary.

##### **Summary**

Odours were released during an 11 week period from Phase 4 at Greengairs landfill site. The waste within this cell began producing gas much sooner than waste in previous cells and at volumes far higher than the recognised industry standard models for gas prediction in use at that time.

There was also an issue with the design and sealing of the leachate well within cell 4A which meant it provided a preferential pathway for gas escape which compounded the problem.

### Mitigating circumstances

1. All steps taken by WRG to bring the odours under control including the impact of weather conditions on site operations and the fact that these steps were above and beyond what would be required by the waste management licence and SEPA
2. The degree of difficulty in managing leachate/landfill gases and that WRG complied with all requirements made by SEPA in the relevant period
3. Cell 4A's defiance of industry recognised models for estimation of gas volume
4. WRG's ongoing monitoring of odours on site and beyond
5. WRG's willingness to work with SEPA to secure compliance on the site
6. this was an isolated event which should be considered in the context of compliance by WRG both before and after this incident

## 5.0 Investigation into how and why the offence occurred

Please give full details of any action you have taken to establish the cause of the offence.

A number of measures were taken to identify the causes and mitigate any future repetition of the events causing the odours:

### Management/Operational Control

- Baseline environmental risk assessments to be carried out on all site infrastructure (additional controls thereafter)
- Permit system implementation and induction etc
- System for monitoring of progress to be agreed implemented
- Contractor control and sign off procedures to be reviewed and improved
- Incident investigation and close out system to be implemented as per permit.
- Daily report of planned work to be forwarded to SEPA
- Personal roles and responsibilities to be reviewed, reaffirmed and inducted as required by permit
- Site team meeting once a week (review and planning) all depts. compulsory attendance
- Objective - to move from 80% reactive work to 80% planned in 9 months
- Review and install maintenance plans - gas/leachate/plant/power/other infrastructure
- Daily departmental inspections system to be implemented and rolling action list.
- This plan to be reviewed weekly and circulated to all team members.
- Security review

### Engineering

- Permanent Capping 4c - first phase - 20,000m<sup>2</sup>
- Complete Capping of cell 4c (progressive)
- Review of side riser and cap seal detail
- Review key in trench detail for future cells
- Design of capping system to avoid erosion problems.
- Review and remediate other currently eroded areas.
- Permanent landscaping to road around perimeter of cell 3 and 4 and cable protection

### Gas control

- Relocation of condensate lines from knockout pot on 4b
- Drill 18 new gas wells within the cell 4c current operational cell

Extend 315mm gas collection main from 4b to 4c	
Commission extended gas main	
Commission 4th fan in environmental compound.	
Flares to be reconnected to new main as fail safe system pending improvements to environmental compound	
Review Hoover wells on eastern end of 4b1 following 3d leachate being put together	
Get 500m3 mobile flare at entrance to 4c operating full time until extended ring main can be used	
Reposition gas mains on cells 4a & b to ensure sustainable falls etc.	
One mobile booster fan to be removed from site. (one to be left as contingency)	
Bag sample gas for H2S and survey cell 4 with Jerome meter	
Drill and tap all strategic points on the gas collection system to allow gas flow to be measured	
Install pin wells on areas of 4c which are too shallow to drill (flank problem areas to south of 4c)	
Standby generator in enviro compound - switch over switch to be installed in event of grid failure	
Review adequacy of all gas infrastructure for longer term sustainability	
Design for next 4 years worth of collection infrastructure to be completed	
Organise FID survey of site to identify specific problem areas and continue daily in short term	
Carryout gas well condition survey incl well head, bentonite seal and CCTV survey (Contractor)	
Remove all old pipework from site and other housekeeping improvements	
Larger flare and 5th fan to be installed within the environmental compound	
3rd party resource to be sourced to carryout bi - weekly monitoring of gas wells (Argus) on-going	
Gas pipework crossings to be installed at appropriate points	
Independent Odournet survey to be carried out	
Flux box testing to be carried out	
These measures were presented to SEPA and agreed as action points at a meeting held at SEPA's East Kilbride office on 30 <sup>th</sup> Jan 2006	

## 6.0 Consequences of the offences/effect on people and environment

There was no effect on the environment or people arising from this offence. Remedial Works were agreed with SEPA and have been carried out following the meeting held at SEPA's East Kilbride office on 30<sup>th</sup> Jan 2006

## 7.0 Potential for Repetition

Do you rate the potential for repetition of the offence(s) as:

☐

**High**

☐

**Medium**

☐

**Low**

Please tick one box.

## Reasons

- 7.1 The occurrence was a one off incident relating to an individual cell and a unique set of circumstances.
- 7.2 The measures put in place both with regards to improved capping scheduling and leachate and cell design mean the circumstances leading to the event cannot be repeated.

## 8.0 Other licences or registrations held

Please detail other licences, permits or registrations issued by the Environment Agency which you hold.

Licence No.	Facility	Site Name
EA WML 57538	Fridge Transfer Station	Bennett Bank
BV1437IB	Landfill	Colsterworth
PP3032SY	Waste to Energy	Deerplay
PPC/W/20041	Landfill	Greengairs
EA WML 80323 ( DL580)	HWRC	Hendon
FB3336RD	HWRC	Langley
BU8819IV	Landfill	Pwllfawatkin
EA WML 34150 (SWW 167 L)	HWRC	Pwllfawatkin
BV0953IM	Leachate Treatment Plant	Stewartby
EA WML 70036 (WDT 25/1993)	Shredding	Stewartby
EA WML 73070 (C38)	Materials Recycling Facility	Weldon
PPC/N/20001	Landfill	Wester Hatton

## **9.0 Remedial and Preventative Measures**

Please detail the measures you have taken to prevent recurrence of the offence including plans for audit and review.

See generally section 5 above.



**WASTE RECYCLING GROUP (CENTRAL) LIMITED**

**HERMITAGE LANDFILL SITE - POST- CONVICTION PLAN ("PCP")**

**Company name:** Waste Recycling Group (Central) Limited – (Company number – 4000033)

**Company address:** Ground Floor West, 900 Pavilion Drive, Northampton Business Park, Northampton, NN4 7RG.

**Date:** 17 March 2011

**1.0 List of offences covered by PCP**

Offences		
	Date	Offence
1.	Between 5 June 2008 and 30 June 2008	Failure to comply with conditions 3.3.5 of the environmental permit number BW02401T by exceeding the limits for methane gas and for carbon dioxide in perimeter gas boreholes at the site contrary to Regulation 38(2) of the Environmental permitting (England and Wales) Regulations 2007.
2.	Between 27 July 2007 and 5 April 2008	That at Hermitage Farm, Bradley Court Road, Hermitage, Newbury, Berkshire (the site) did fail to comply with condition 1.1.1 of the environmental permit number BW02401T by not following the site management system for the site contrary to Regulation 32(1)(b) of the Pollution Prevention and Control (England and Wales) Regulations 2000.
	Between 6 April 2008 and 1 June 2008	Failure to comply with condition 1.1.1 of the environmental permit number BW02401T by not following the site management system for the site contrary to Regulation 38(2) of the Environmental Permitting (England and Wales) Regulations 2007.
3.	Between 27 July 2007 and 5 April 2008	Failure to comply with condition 1.1.2 of the environmental permit number BW02401T by failing to complete records to show adherence to the site management system for the site contract to Regulation 32(1)(b) of the Pollution Prevention and control (England and Wales) Regulations 2000.
	Between 6 April 2008 and 1 June 2008	Failure to comply with condition 1.1.2 of the environmental permit number BW2401T by failing to complete records to show adherence to the site management system for the site contrary to Regulation (38(2) of the Environmental Permitting (England and Wales) Regulations 2007.

Where	Court	Person convicted	Plea	Date of Conviction	Sentence	Current business relationship
Hermitage landfill site, Hermitage Farm, Bradley Court Road, Hermitage, Newbury, Berkshire	West Berkshire Magistrates' Court, Newbury	Waste Recycling Group (Central) Limited	Guilty plea	17 January 2011	Fined £30,000 (plus costs £8,169.90)	Operator

## 2.0 List of Permit to which this PCP relates

Permit Number	Site
EPR/BW0240IT	Hermitage Landfill Site

## 3.0 List of persons / relevant persons to which this PCP relates

Persons Convicted:
Waste Recycling Group (Central) Limited ("WRG") – incorporated 23.05.2000

## 4.0 Circumstances/causes of the Offence

Please provide details of events which led to the commission of the offence including accountability and any mitigating circumstances you feel are relevant. Continue on a separate sheet if necessary.

### Summary

In 2008 whilst contractors were demolishing the Hermitage landfill (the "Facility") site office infrastructure the power to this infrastructure was turned off subsequently causing the flare telemetry system to be switched off. This action led to notification of the flare failure to go un-noticed for two days with subsequent breaches in the perimeter gas boreholes.

### Detail:-

During 2008 in order to install soil and other materials to achieve the planned restoration to the Facility, buildings on the site had to be demolished, involving the input of third party contractors. To facilitate demolition works, as a temporary measure, certain power supplies to parts of the Facility were altered for health and safety reasons. The flare was not affected and the power connection to the flare remained throughout. The power connection to another piece of infrastructure was terminated. Inadvertently it was not recognised that the same power connection also linked to a telemetry system which by way of a communication system notified WRG and its agents in the event of a failure of the flare. Regrettably, whilst the telemetry system was inoperable the flare unexpectedly failed and no notification was received by the site management.

The Environment Agency ("EA") has confirmed that it has been informed that the flare was reported as operational by a third party who was at the Facility on 4 June 2008. On 6 June 2008 the flare was identified as non operational and immediate action taken. The flare was restarted and monitoring of the gas wells undertaken at WRG's behest.

The limited interruption to the operation of the flare system appeared to impact on the

levels of naturally occurring substances in the Facility's gas monitoring wells. Elevated levels were identified and self reported by WRG to the Environment Agency. The levels identified were above the levels permitted. It is not known whether even if the telemetry system had been operable and action taken on receipt of the notification whether the permitted levels would have been exceeded.

WRG took full remedial action to reduce the levels identified in the monitoring points and regularly updated the Environment Agency. It is accepted by the Environment Agency that WRG was "quick to inform and to fix the fault with the gas flare", "increased the amount of monitoring" and WRG was "quick to react to the problem and continued to monitor the situation closely".

The gas flare infrastructure has been replaced with a revised model, a different organisation has been contracted to inspect the new flare on an advanced scheduled basis. Enhanced fall back notification systems have been implemented in the event of any future flare failure. No future works to the power supply to such systems are required.

The site management system ("SMS") at the time of the application for the Permit was drafted on the basis that the Facility was fully operational and accepting waste. As a result some of WRG's own requirements in terms of monitoring and record keeping were more stringent than they otherwise may have been. By way of example, only if waste is continuing to be deposited it is important to monitor the position frequently in case of any changes due to the input of waste. If waste is not being deposited and has not been for some time then monitoring frequency requirements may differ. In real terms however, by the time the Permit was issued the Facility had ceased to accept waste. The original written SMS was in turn superseded by detailed technical documents comprising the site closure plan, a landfill gas risk assessment and a landfill gas management plan. Over time these documents needed to change to reflect the development of conditions and status of the Facility. Unfortunately they did not and there were differences between operational practice and the documents in place. Some of which were logical decisions due to the status of the Facility. For example, documents since agreed by the Environment Agency have approved monthly checks of the gas infrastructure collection system rather than the weekly checks which were in the written document. Other differences to the SMS were the number of services of the gas flare and the monitoring of the gas flow rate were intended to be implemented. Due to the technical nature of these requirements implementation was reliant on specialist contractors and for various reasons was not effective. WRG accepts that these actions should have been implemented and accepts responsibility.

### **Mitigating circumstances**

Prompt admission and plea of guilty.

Proactive steps taken to rectify matters including notification to the EA, extensive monitoring and a root and branch review of management systems and extensive revised systems implemented.

Total co-operation with the EA during the investigation.

No prior warnings.

The offence was not the result of the Defendant failing to spend money.

Significant consideration given to and expenditure on environment matters.

At senior management and director level, WRG actively sought engagement with the EA in order to address matters properly and transparently. This responsible conduct is also evident in the way in which inaccuracies in the original charges were raised at the first opportunity and not used tactically.

A full audit of the SMS was carried in March 2010 and subsequent changes were made such as continued weekly gas field balancing, continued programmed quarterly gas flare maintenance as well as Enitral (a third party) being added to the gas flare telemetry call out

procedure whereby they would receive a text message notifying themselves along with the site management team of a gas flare outage. They are now contractually obliged to respond immediately to an outage during weekends and public holidays, as well as responding to out of hours outage notification by start of work the following day.

As part of the WRG Integrated Management System ("IMS") Hermitage will have a Site Filing System ("SFS") installed by 1<sup>st</sup> December 2010. This is an updated system that is bespoke to Hermitage and not a generic document as it was. This SFS can be reviewed at any time by the EA as it is already in place at Sutton Courtenay landfill site forms part of WRG's wider group's ISO 14001 accreditation alongside ongoing 9001 and 18001.

There is data held on both programmed and un-programmed maintenance of the gas flare on a register of works. This could be put in to any format the EA desires and could be updated on a regular basis.

Training is given by the wider WRG group both internally and externally for specifics of the IMS and SFS systems as well as Environmental Auditing. Anna Palmer, Site Technical Manager ("STM") for the Hermitage Facility is also trained in Environmental Auditing. The wider WRG group has an "In House" auditing team that carries out ISO audits which include Environmental. Unfortunately they have not yet audited Hermitage but an audit will be carried out in-house prior to the final SFS sign off.

Reviews will be carried out as indicated above which will show full compliance with both the IMS and SFS systems prior to 1<sup>st</sup> December 2010 ready for the programmed Agency Audit in December 2010 or early 2011. I believe that the EA will see that all aspects of the SFS are both compliant and specific to the Hermitage Facility.

The Facility currently hold six monthly formal reviews with the EA covering all sites in their region attended by PPC Officers, Team Leader, Regional WRG manager, SBM, Technical, Engineering, and Estates manager. This may be amended to three monthly formal reviews in order to resolve any queries. Also the SBM and STM should have site based meetings with the PPC officer on both specific site issues & operational management updates.

## **5.0 Investigation into how and why the offence occurred**

Please give full details of any action you have taken to establish the cause of the offence.

See 4.0 above.

## **6.0 Consequences of the offences/effect on people and environment**

There were no consequences/effects on people or the environment during this period of non-compliance. There is no evidence that landfill gas migrated through the cap during the downtime of the flare.

## **7.0 Potential for Repetition**

Do you rate the potential for repetition of the offence(s) as:

☐

**High**

☐

**Medium**

☒

**Low**

Please tick one box.

## Reasons

### 8.0 Other licences or registrations held

Please detail other licences, permits or registrations issued by the Environment Agency which you hold.

Licence number	Registration type	Site to which it relates
EA WML 10040	Landfill	Allington
EA WML 19514 (P/11/24)	Landfill	Allington
EA WML 80463 (333/96)	Landfill	Aveley
EA WML 80462 (372/97)	Landfill	Aveley
EPR/BW0037IA	Landfill	Bubbenhall
EA WML 86105 ( OCC/122)	Household Waste Recycling Centre	Dean Pit
EPR/BV7214IR	Landfill	Dix Pit
EA WML 86399	Landfill	Dix Pit
EA WML 19484 (WML P/09/44)	Composting	Dunbrik
BU0834IP	Landfill	Edwin Richards
EPR/BW0240IT	Landfill	Hermitage
PPC/AP3533LF	Landfill	Judkins
EA WML 42394 (SLW 0467)	Household Waste Recycling Centre	Judkins
EPR/AP3296LW	Household Waste Recycling Centre	Judkins
EA WML 40003	Landfill	Judkins
UP3832MC	Leachate Treatment Plant	Kendal Fell
WP3439SS	Landfill	Norwood Farm
EA WML 86153 (OCC/120)	Landfill	Oakley Wood
VP3330BC	Waste to Energy	Offham
EA WML 19502 (P/10/68)	Landfill	Offham
EA WML 80508	Landfill	Ongar
EA WML 83272 (DL186)	Transfer Station	Southwark
EA WML 19508 (P/10/76)	Landfill	Stangate
EA WML 19488 (P/10/08)	Landfill	Stangate
EPR/BV7001IK	Landfill	Sutton Courtenay
EA WML 83060 (WRA/44)	Composting	Thorpe Green
EA WML 71114 (392/98)	Transfer Station	Thurrock
EA WML 83139 (54/12/4/263)	Landfill	Wraysbury
EA WML 83320	Leachate Treatment Plant	Wraysbury

### 9.0 Remedial and Preventative Measures

Please detail the measures you have taken to prevent recurrence of the offence including plans for audit and review.

Detailed in 4.0 above.

## **WRG WASTE SERVICES LIMITED**

### **GREENGAIRS LANDFILL SITE - POST- CONVICTION STPLAN ("PCP")**

**Company name:** WRG Waste Services Limited

**Company address:** Ground Floor West, 900 Pavilion Drive, Northampton Business Park, Northampton, NN4 7RG.

**Date:** 4 February 2009

#### **1.0 List of offences covered by PCP**

<b>Offence</b>
That during an 11 week period, the level of public concern caused by the odours resulted in SEPA recommending a legal course of action. No formal judgment will be issued by the Court. The Court record will simply narrate that a plea of guilty was tendered to a breach of section 33(6) of the 1990 Act, and the level of fine imposed.

<b>When &amp; where</b>	<b>Court</b>	<b>Person convicted</b>	<b>Plea</b>	<b>Date of Conviction</b>	<b>Sentence</b>	<b>Current business relationship</b>
11 week period, autumn 2004 at Greengairs Landfill Site	Airdrie Sheriffs' Court	WRG Waste Services	Guilty plea.	4 February 2009	Fined £8,000	Operator

#### **2.0 List of Permit to which this PCP relates**

<b>Permit Number</b>	<b>Site</b>
PPC-W-20041	Greengairs Landfill Site

#### **3.0 List of persons / relevant persons to which this PCP relates**

Persons Convicted:
WRG Waste Services Limited

#### **4.0 Circumstances/causes of the Offence**

Please provide details of events which led to the commission of the offence including accountability and any mitigating circumstances you feel are relevant. Continue on a separate sheet if necessary.

##### **Summary**

Odours were released during an 11 week period from Phase 4 at Greengairs landfill site. The waste within this cell began producing gas much sooner than waste in previous cells and at volumes far higher than the recognised industry standard models for gas prediction in use at that time.

There was also an issue with the design and sealing of the leachate well within cell 4A which meant it provided a preferential pathway for gas escape which compounded the problem.

### Mitigating circumstances

1. All steps taken by WRG to bring the odours under control including the impact of weather conditions on site operations and the fact that these steps were above and beyond what would be required by the waste management licence and SEPA
2. The degree of difficulty in managing leachate/landfill gases and that WRG complied with all requirements made by SEPA in the relevant period
3. Cell 4A's defiance of industry recognised models for estimation of gas volume
4. WRG's ongoing monitoring of odours on site and beyond
5. WRG's willingness to work with SEPA to secure compliance on the site
6. this was an isolated event which should be considered in the context of compliance by WRG both before and after this incident

## 5.0 Investigation into how and why the offence occurred

Please give full details of any action you have taken to establish the cause of the offence.

A number of measures were taken to identify the causes and mitigate any future repetition of the events causing the odours:

### Management/Operational Control

- Baseline environmental risk assessments to be carried out on all site infrastructure (additional controls thereafter)
- Permit system implementation and induction etc
- System for monitoring of progress to be agreed implemented
- Contractor control and sign off procedures to be reviewed and improved
- Incident investigation and close out system to be implemented as per permit.
- Daily report of planned work to be forwarded to SEPA
- Personal roles and responsibilities to be reviewed, reaffirmed and inducted as required by permit
- Site team meeting once a week (review and planning) all depts. compulsory attendance
- Objective - to move from 80% reactive work to 80% planned in 9 months
- Review and install maintenance plans - gas/leachate/plant/power/other infrastructure
- Daily departmental inspections system to be implemented and rolling action list.
- This plan to be reviewed weekly and circulated to all team members.
- Security review

### Engineering

- Permanent Capping 4c - first phase - 20,000m<sup>2</sup>
- Complete Capping of cell 4c (progressive)
- Review of side riser and cap seal detail
- Review key in trench detail for future cells
- Design of capping system to avoid erosion problems.
- Review and remediate other currently eroded areas.
- Permanent landscaping to road around perimeter of cell 3 and 4 and cable protection

### Gas control

- Relocation of condensate lines from knockout pot on 4b
- Drill 18 new gas wells within the cell 4c current operational cell

Extend 315mm gas collection main from 4b to 4c	
Commission extended gas main	
Commission 4th fan in environmental compound.	
Flares to be reconnected to new main as fail safe system pending improvements to environmental compound	
Review Hoover wells on eastern end of 4b1 following 3d leachate being put together	
Get 500m3 mobile flare at entrance to 4c operating full time until extended ring main can be used	
Reposition gas mains on cells 4a & b to ensure sustainable falls etc.	
One mobile booster fan to be removed from site. (one to be left as contingency)	
Bag sample gas for H2S and survey cell 4 with Jerome meter	
Drill and tap all strategic points on the gas collection system to allow gas flow to be measured	
Install pin wells on areas of 4c which are too shallow to drill (flank problem areas to south of 4c)	
Standby generator in enviro compound - switch over switch to be installed in event of grid failure	
Review adequacy of all gas infrastructure for longer term sustainability	
Design for next 4 years worth of collection infrastructure to be completed	
Organise FID survey of site to identify specific problem areas and continue daily in short term	
Carryout gas well condition survey incl well head, bentonite seal and CCTV survey (Contractor)	
Remove all old pipework from site and other housekeeping improvements	
Larger flare and 5th fan to be installed within the environmental compound	
3rd party resource to be sourced to carryout bi - weekly monitoring of gas wells (Argus) on-going	
Gas pipework crossings to be installed at appropriate points	
Independent Odournet survey to be carried out	
Flux box testing to be carried out	
These measures were presented to SEPA and agreed as action points at a meeting held at SEPA's East Kilbride office on 30 <sup>th</sup> Jan 2006	

## 6.0 Consequences of the offences/effect on people and environment

There was no effect on the environment or people arising from this offence. Remedial Works were agreed with SEPA and have been carried out following the meeting held at SEPA's East Kilbride office on 30<sup>th</sup> Jan 2006

## 7.0 Potential for Repetition

Do you rate the potential for repetition of the offence(s) as:

☐

**High**

☐

**Medium**

☒

**Low**

Please tick one box.



## Reasons

- 7.1 The occurrence was a one off incident relating to an individual cell and a unique set of circumstances.
- 7.2 The measures put in place both with regards to improved capping scheduling and leachate and cell design mean the circumstances leading to the event cannot be repeated.

## 8.0 Other licences or registrations held

Please detail other licences, permits or registrations issued by the Environment Agency which you hold.

Licence No.	Facility	Site Name
BV5165IJ	Landfill	Arlesey
BM6093IS	Landfill	Bennett Bank
EA WML 57538	Fridge Transfer Station	Bennett Bank
EA WML 70099 (WDA 399)	HWRC	Bleak Hall
BM4635IH	Landfill	Bletchley
BV3766IH	Landfill	Brogborough
BS8605IQ	Landfill	Calvert
GP3830BG	Landfill	Chirk
BV1437IB	Landfill	Colsterworth
PP3032SY	Waste to Energy	Deerplay
BV3740ID	Landfill	Dogsthorpe
EA WML 73100	Materials Recycling Facility	Dogsthorpe
EA WML 73109	Fridge Transfer Station	Dogsthorpe
BV4444IQ	Landfill	Dorket Head
PPC/W/20041	Landfill	Greengairs
EA WML 80334 (DL054)	Transfer Station	Hendon
EA WML 80323 (DL580)	HWRC	Hendon
EA WML 70096 (WDA 381)	HWRC	New Bradwell
EA WML 75190	HWRC	Newport Pagnell
EA WML 70100	HWRC	Newport Pagnell
BU8819IV	Landfill	Pwllfawatkin
EA WML 34279	Landfill	Pwllfawatkin
EA WML 34150 (SWW 167 L)	HWRC	Pwllfawatkin
BW3001IX	Landfill	Serlby
BV0953IM	Leachate Treatment Plant	Stewartby
BV4576IK	Landfill	Stewartby
EA WML 70036 (WDT 25/1993)	Shredding	Stewartby
BV4525IB	Landfill	Weldon
EA WML 73070 (C38)	Materials Recycling Facility	Weldon
PPC/N/20001	Landfill	Wester Hatton

## **9.0 Remedial and Preventative Measures**

Please detail the measures you have taken to prevent recurrence of the offence including plans for audit and review.

See generally section 5 above.