



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

Site	Allerton Waste Recovery Park EPR/KP3808PN		Permit Ref	KP3808PN		
Operator/ Permit holder	THALIA AWRP ODC LIMITED					
Date	19/05/2026		Time in	10:30	Out	13:30
What parts of the permit were assessed	Site Inspection					
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge
Recipient's name/position	Compliance Manager					
Officer's name			Date issued	20/05/2026		

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 2) and the Actions (section 4). 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	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	A	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	A	
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	A	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
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	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.

Inspection Summary

This was a prearranged inspection of the Allerton Waste Recovery Park operated by Thalia AWRP ODC Limited. The objectives of the inspection were;

- (i) to introduce and familiarise a new EA inspector to the installation
- (ii) to discuss and inform the site of the classes of loss of CEM data
- (iii) update on the AD biogas system bag high level sensor
- (iv) Loss of VOC data from Line 2 on 31 March 2026
- (v) Discuss work plans for 2026/27

Persons Seen

Compliance Manager
Principal Process Engineer
Principal Maintenance Manager
E C&I Engineers (2 off - part)

Documents Seen

No documents requested in advance of the meeting. During the inspection a copy of the sites QAL3 procedure was inspected - AWRP-EW-OP-PR-036 EfW QAL3 Procedure.

Observations and Findings

1. There have been a number of recent changes to personnel. A number of key vacancies remain with active recruitment ongoing.

2. The different classes of loss of CEM data was discussed in detail;

Invalid Half hourly (10 minute) averages/Daily Averages

Condition 3.2.2 (c-e) outlines the requirements for invalid half hourly and daily averages and covers sites for periods when routine calibrations of the CEM systems are being performed as part of a robust quality assurance programme. A half hourly average is classed as invalid when less than 20 minutes of data is available. Each CEM is allowed 5 such invalid half hourly averages in a 24 hour period. An excess of 5 half hourly averages in a 24 hour period would constitute an invalid daily average. Sites are allowed 10 invalid daily averages after which the site will be in breach and an improvement plan would be required by the EA

Abnormal Operation

Conditions 2.3.9 - 2.3.13 covers the requirements for abnormal operation. Abnormal operation allows for periods when key abatement and CEM systems are unavailable. During these periods the emission limit values in Table S3.1 are not applied but those outlined in Table S3.1(a) are applicable. Loss of CEM can be classed as abnormal operation should there be a *technically unavoidable stoppage, disturbance or failure* of the CEM. A site has a maximum of 4 hours to resolve this issue after which the period of abnormal operation must end. Total aggregated hours in

a calendar year is 60.

Technically avoidable and foreseeable

Losses of CEM data which are technically foreseeable and avoidable - such as failings in systems/procedures or error - are not allowed under the permit and must constitute a Schedule 5 notification to the EA without delay.

3. It is unclear whether the site have both an invalid half hourly/daily average log OR an abnormal operation log.

ACTION - Thalia to review their CEM data losses against the requirements outlined above, amend as necessary and confirm both documents are available for inspection by the EA - End date **30 June 2026**.

4. On 31 March 2026 a 30 minute CEM data loss occurred during a routine QAL3 of the standby CEM analyser. Investigations identified this resulted by the Line 2 CEM going into SPAN mode. As such, calibration ensued resulting in data loss. It is clear that this was technically avoidable and is covered by the QAL3 procedure - refer to CAR ID KP3808PN/0599437 for further details.

5. Thalia have installed a new PLC system within the AD switch room. This new unit has been configured to introduce a 40 second delay on the gas bag Hi level sensor. Previously, numerous PRV control valve events occurred following spurious readings on the Hi level sensor. It is hoped that this delay will minimise these false high readings and significantly reduce such events.

Site Tour

6. Full site tour focussing on main working areas - AD/gas engines, MT, EFW control room/reception hall/CEM platform/IBA collection.

7. Housekeeping was very poor at the time of inspection in particular (i) significant number of FIBC bags containing IBA stored outside of the dedicated area, pallets of unlabelled bags (appear to be glass like material) on unmade ground on exit to the reception hall (iii) Signs of IBA on the roadway serving the MT and the recycled plastics canopy (iii) significant quantities of plastic across the roadway. Note - this level was assessed as excessive and indicative of failure to ensure adequate controls to minimise the potential for pests, and offsite impacts.

ACTION - Thalia to review housekeeping procedures and submit findings, including identified improvements, to the EA for review and approval - End date **30 June 2026**.

Discussion and Conclusions

8. Unannounced inspection to follow in near future to assess improvements in site housekeeping standards. EA will consider further enforcement in line with the EA Enforcement Policy should standards not improve. There is the potential for diffuse pollution, pests and offsite impacts.

9. Inspection of invalid and abnormal operation logs to be undertaken at future inspections

10. Work to prevent potential biogas events is welcomed. However, there continue to be technically avoidable losses of CEM data. Further discussions following submission of specific action end date 30 June 2026.

11. Further inspections in-line with Compliance Action Plan. Focus on Climate Change Adaptation, review of QAL2/AST and OTNOC audits.

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.

X

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

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?

If a permit holder disagrees with the CAR form, they should raise their concerns to the officer or team which issued the form. This must be done within 14 calendar days of receipt. If the response does not resolve the issue, a permit holder can request an appeal of the regulatory decision. This request must be made within 28 calendar days of receipt of the response. More details on our regulatory appeals process can be found at

<https://www.gov.uk/guidance/appeal-a-regulatory-decision-from-the-environment-agency>.

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.