



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	24/03/2026				Time in	10:00	Out	14:00
What parts of the permit were assessed	Routine Site Inspection							
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op		Water Discharge	
Recipient's name/position	Compliance Manager							
Officer's name					Date issued	07/05/2026		

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	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	A	
	2. Management system & operating procedures	A	
	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	A	
	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	A	
	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	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 Thalia AWRP ODC facility at Allerton Park nr Knaresborough. A range of items were discussed namely;

Site Update

Strategic review of CO releases update

Missed historical data

Loss of CEM data

Site Tour

Persons Seen

Compliance Manager

Environmental Business Partner

Business Improvement Director

HSEQ Advisor

Technical Manager

Interim Maintenance Manager (part)

Plant Director (part)

Contract Engineer (part)

Site Shift Manager (part)

Documentation Seen

No documentation requested in advance. A range of site SOPs, spreadsheets and reports inspected during intervention.

Observations and Findings

1. There have been a number of staff changes over recent months with a new Compliance Manager and vacancy for Principal Operations Manager. The site Process Engineer has also recently left the business. Recruitment for these positions is ongoing. In the interim period support is being offered by Thalia Head Office staff.

CO Strategic Review

2. Actions from the project to reduce CO high half hourly values is progressing well. A permit variation is ready for submission with a request to adopt the 95thile 10 minute average. It is anticipated that the overwhelming majority of 30 min average exceedences will be within the revised limit.

3. A range of site operations changes have been implemented as part of an overall BAT review, namely;

(i) Review and update of selected site procedures including Waste Acceptance Procedure, Bunker Management Plan and Bulky Waste Processing.

(ii) Inclusion of a second shredder within the reception hall. It is noted that there has been an

improvement in POPs waste as these streams are now routinely received as part of mixed waste and not bulky.

(iii) Consideration to a eddy current separator after the shredders

(iv) Improved cleaning regimes adopted for soot-blowing and boiler tube fouling

4. Future work planned exploring potential improvements to the furnace thermodynamics. It is noted that the site is running at a reduced throughput of 59.5 tph compared to design of 62 tph.

5. Historically Thalia have submitted numerous high half hourly CO breaches under abnormal operation. Thalia are to have OTNOC discussions with EA EFW lead to further embed their understanding regarding the notification processes for CO high levels.

Missed Schedule 5 notifications

6. A number of missed Schedule 5 notifications and amendments to reporting requirements were submitted to the EA during Feb 2026. This submission covered the periods Q2 2024 - Q1 2025. All submissions have since been placed on the Public Register. Refer to CAR ID KP3808PN/0598439 for details of enforcement action.

7. Gaps were identified following loss of the previous Compliance Manager in that no SOP existed for escalation of either a half hourly or daily average breach to the EA. As such Thalia have introduced a dedicated SOP - Breaches to Air Procedure AWRP-SW-EN-PR-015.

8. The new procedure clearly outlines roles and responsibilities along with key interventions required. In summary the procedure is designed as follows;

(i) On exceedence of either a half hourly or daily average site operatives to notify STL (ii) STL to review and implement an initial investigation. Submit on Thalia internal eco-online system and complete a Schedule 5 notice (iv) Schedule 5 reviewed by HSEQ before final submission to EA (v) plans for robust investigation and timely submission of Schedule 5 Part B by HSEQ.

9. The revised process provides greater involvement from the STL. Shortly after midnight the STL is actioned to undertake a review of the previous 24 hours data in order to ensure no notifications are missed. Daily averages would be spotted at this stage by the STL is missed by the Process technicians.

10. The SOP is currently "on trial" with process technicians in the main control room. A discussion with the site technicians confirmed the revised procedure. It was also noted that in the event of a half hourly exceedence the reading will alarm and generate red graphics on the control room PLC. This will remain in red once transferred onto the "last 30 min average" column.

11. The same process is to be used to ensure that losses of CEM data and abnormal operation/OTNOC are identified without delay.

Loss of CEM data

12. A significant number of CEM losses of data have been reported over the last few months. The causes are wide ranging and the majority were foreseeable and preventable. Refer to separate CAR forms for specific details. The EA will give consideration to higher levels of enforcement should the number of cases continue.

Discussion and Conclusions

13. Thalia appear to have made improvements to reduce the number of half hourly CO breaches. These changes, and the subsequent variation to a 95%ile 10 minute average are anticipated to significantly reduce the number of schedule 5 notifications.

14. The high number of CEM data losses is of concern. The majority are preventable and indicative of inadequate control over the associated maintenance activities.

15. Further interventions in line with the sites Compliance Action Plan.

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.

X

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

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.