



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

Site	West Newton Well Site			Permit Ref	BB3001FT		
Operator/ Permit holder	Rathlin Energy (U K) Limited						
Date	28/08/2014			Time in	11:05	Out	13:50
What parts of the permit were assessed	See below						
Assessment	Audit	EPR Activity:	Installation	Waste Op	X	Water Discharge	
Recipient's name/position	redacted						
Officer's name	redacted			Date issued	01/09/2014		

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

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	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	C4	1.1.2
	2. Management system & operating procedures	C3	2.3.1
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	A	
	3. Surface water	A	
	4. Sewer	NA	
	5. Waste	A	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates & litter	A	
	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	A	
	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

Number of breaches recorded	2	Total compliance score (see section 5 for scoring scheme)	4.1
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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.

Present: redacted

Environmental Management System (EMS).

Security procedures standard document RE-03-019 has been put in place in response to Action 5 on CAR form dated 3/7/2014. The procedure references checklist RE-05-CHK-008.

Since 1/8/2014 check lists have been completed by service contactors rather than site security as there has been a 24hr contractor presence on site during well testing. Checklists have been completed by Expro Group and Altus QSERV.

It was reported that procedure RE-03-019 and checklist RE-05-CHK-008 have been trained out to security but no records have been kept of which security guards were trained.

Action 1: Train out procedure RE-03-019 and checklist RE-05-CHK-008 to security guards and keep a record of those trained. Timescale: Prior to site security resuming responsibility for check list.

Noise management

Herras fencing with acoustic panelling has been positioned around the mud pump container. The doors of the mud pump container are being kept open to improve cooling. The open doors will reduce the sound attenuation provided by the container.

It was reported that noise monitoring is to be carried out on site and at selected off site sensitive receptors during operation of the flare.

Inventory of substances stored on site

A copy of the inventory of hazardous materials on site was requested. The well site supervisor was able to access an inventory document inventory via an email on his mobile phone. Due to poor IT links at the site it took 15 minutes to forward the email to an onsite laptop and print out the inventory.

The inventory did not have a date or version number and listed some materials that have been removed from site.

Action 2: Make the hazardous materials inventory a controlled document as part of the EMS with a version number and date and update it to reflect the substances stored on site. Timescale 8 September 2014

The COSHH store was inspected. It was not possible to inspect all the contents as it was being used to store a large number of empty plastic bags contaminated with product residue which were awaiting disposal. It was reported that these are to be transferred to an enclosed skip. The COSHH store will be inspected again during a future site visit.

Outside storage areas were also inspected.

The following substances were present which are not listed on the chemical inventory in appendix 5

of Waste Management Plan RE-05-EPRA-WN-005 Rev: 1.00 submitted as part of the permit application:

3 off empty 25kg cans of 'Brad-tech 6035' (stored on banded pallet)
2 off 205 litre barrels of monethylene glycol (stored on banded pallet)
2 off 205 litre barrels of methanol (stored in drip tray)

Action 3: Confirm what these substances were/are used for on the well site. Timescale: 8 September 2014

Other

Air quality monitoring equipment present on site perimeter at South West corner.



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Section 3- Enforcement Response **Only one of the boxes below should be ticked**

<p>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.</p>	
<p>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.</p>	X
<p>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.</p>	
<p>We will now consider what enforcement action is appropriate and notify you, referencing this form.</p>	

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			
C1	C4	Action: Train out procedure RE-03-019 and checklist RE-05-CHK-008 to security guards and keep a record of those trained. Timescale: Prior to site security resuming responsibility for check list.	N/A
C2	C3	Make the hazardous materials inventory a controlled document as part of the EMS with a version number and date and update it to reflect the substances stored on site. Confirm what the substances not listed on the appendix 5 chemical inventory were/are used for on the well site (refer to text details).	08/09/2014

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.

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.