



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

Site	Rattlechain Lagoon		Permit Ref	40803		
Operator/ Permit holder	Rhodia Limited					
Date	23/06/2025		Time in	10:00	Out	11:12
What parts of the permit were assessed	As marked below					
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge
Recipient's name/position	director					
Officer's name	[REDACTED]		Date issued	07/07/2025		

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	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	N	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates & litter	A	
	4. Pests, birds & scavengers	A	
	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	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.

Purpose: Site familiarisation and routine site inspection of closed landfill site. Notice of Powers and Rights given to Technically competent person accompanying us on site walkaround at 10:00 Hours.

Weather: 22C, light cloud sunny, Wind 3 mph North Easterly.

Action on previous CAR reference 40803/0505513 dated 16.05.2024

Action: Provide full set of laboratory validated data and report for April and October 2023 monitoring data. Due date: 14.06.2024.

This was fully completed and discussed at meetings with site managers 23.07.2024

The site had last been inspected on 16/05/2024 (EPR Compliance assessment report ID: 40803/0505513) as part of a routine inspection.

Observations:

Gates were open as staff on site. Hazardous waste sign, as required by the licence, was displayed. Site is surrounded by a high security fence. Additional security is provided by 24 hour CCTV. We did not see any evidence of unauthorised access.

We walked the perimeter of the lagoon and the causeway accompanied by the TCM of Oldbury Energy Solutions Ltd. The Director told us that a security guard patrols the site on Saturdays and Sundays. Site inspections are carried out monthly and monitoring visits are carried out every six months (in April and October). If the water in either of the lagoons gets too high then it is pumped to the canal in accordance with discharge consent.

Works were being carried out to reduce the amount of grass and foliage on site by strimming and mowing.

We inspected headworks for boreholes RC101 and BH6, both were accessible and in satisfactory condition. Data monitoring system adequately covered.

No amenity issues such as dust/odour/noise/pests on site at the time of the inspection could be made.

Discussions were had reference the detail of the signage at the site. It is clear and evident in the permit what is required and what you agreed should be displayed. This is exactly what is displayed on the gates to the site. However additional advice and information to members of the public can be displayed which gives clarity and guidance if needed to contact the environment agency see guidance attached.

Guidance

Develop a management system: environmental permits which can be found at <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

with particular attention please to the sub section **Contact information for the public.**

Transfer of permit: We discussed the possible transfer of the permit. You can find information on how to transfer your environmental permit here:

<https://www.gov.uk/guidance/change-transfer-or-cancel-your-environmental-permit>

The application forms are at this link:

<https://www.gov.uk/guidance/change-transfer-or-cancel-your-environmental-permit-transfer-your-permit-to-somebody-else>

If you need advice you can contact our National Permitting Service to find out what you need to do to transfer the environmental permit. This can be done by seeking pre-application advice. You will need to complete a form to request this. You can have up to 2 hours of basic pre-application advice free of charge. This will explain how to complete the forms required and what information is needed. Or you can ask for enhanced surrender advice which is chargeable which will give you more detailed site specific advice.

The site has the following discharges to water and groundwater permit registered.

Permit MI/T/08/22375/T/001 – SOLVAY SOLUTIONS UK LIMITED

Permit number MI/T/08/22375/T/001

Permit Holder Name SOLVAY SOLUTIONS UK LIMITED

Start Date 06/05/1993

Summary: The total compliance score for this CAR form is 0 CCS points. Your compliance score for 2024 is 0 CCS points. This means you are currently a Band A operator and if you remain in Band A you will pay 95% of the annual subsistence fee due in April 2026.

There were a number of aspects of your permit which were not assessed during this site inspection.

Please be aware that other parts of the permit could be reviewed in the future.

Incident Hotline: 0800 80 70 60 | **Customer Enquiries:** 03708 50 65 06

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.	
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.