

Annex 3 Pollution Prevention and Control (PPC) - landfills (hazardous and non-hazardous)

SEPA Compliance Assessment

SEPA licence no.	
Site name	
Annual summary sheet for year	
Completed by	
Date	

Environmental limits								
ELC parameter	Typical licence condition no.	Data source	No breaches	Minor breach(es) or minor environmental event(s)	Repeated minor breaches or events	Gross breach	Significant breach(es)	Comments
List of typical ELCs:								
Scope ELCs								
Description of activity and geographic boundaries	1.1.1-1.1.4	Inspections		n/a	n/a	n/a	Activities outwith scope or boundary	
Numeric ELCs								
Noise	Where set 2.9.2		Compliant with licence	Breach of licence condition	Four or more minor breaches	Monitoring or reporting failure only	Causes Category 1 (major) or Category 2 (significant) environmental event	ELC condition where noise limits are set.
Landfill gas monitoring and reporting external to the waste	8.6.3/8.6.4	Inspection / COA / operator monitoring records / SEPA monitoring	Compliant with licence	Exceeds licensed limits	See look-up table (Table 6) for number of minor breaches constituting repeated minor breaches.	More than twice licensed limit	Causes Category 1 (major) or Category 2 (significant) environmental event	
Suspended solids			Compliant with licence	Exceeds the licensed limit but is less than twice the licensed limit.	See look-up table (Table 6) for number of minor breaches constituting repeated minor breaches.	Exceeds twice the licensed limit.	Causes Category 1 (major) or Category 2 (significant) environmental event	
Biological oxygen demand (BOD)			Compliant with licence	Exceeds the licensed limit but is less than twice the licensed limit.	See look-up table (Table 6) for number of minor breaches constituting repeated minor breaches.	Exceeds twice the licensed limit.	Causes Category 1 (major) or Category 2 (significant) environmental event	
Numeric statistical ELCs								
None listed								
Process ELCs (a & b)								
Odour	2.13.1	Inspection	Compliant with licence	Breach of licence condition	Four or more minor breaches	Failure to monitor or submit a report which would allow the licence holder to demonstrate compliance with a Process ELC	Causes Category 1 (major) or Category 2 (significant) environmental event	
Fires	2.14.1	Inspection	Compliant with licence	Breach of licence condition	Four or more minor breaches	As above	Causes Category 1 (major) or Category 2 (significant) environmental event	
Total waste quantity	4.1.1	Waste data returns	Compliant with licence	Breach of licence condition	N/A	As above	Causes Category 1 (major) or Category 2 (significant) environmental event	Not likely to be routinely exceeded - final operational year assessment condition.
Annual waste quantity	4.1.2	Waste data returns	Compliant with licence	Breach of licence condition	N/A	As above	Causes Category 1 (major) or Category 2 (significant) environmental event	No multiple minor breaches possible if annually assessed.
Waste types	4.1.3 / 4.2.1	Weightbridge records / inspection	Compliant with licence	Breach of licence condition	Four or more minor breaches	As above	Causes Category 1 (major) or Category 2 (significant) environmental event	Minor breaches not applicable as allowance made for some non-specified wastes entering site and being dealt with in accordance with procedures. Where this does not occur, then a significant breach occurs as operator has accepted the waste.
Geological barrier - basal liner	6.1.1	Construction Quality Assurance (COA) report	Compliant with licence	Breach of licence condition	N/A	As above	Causes Category 1 (major) or Category 2 (significant) environmental event	
Leachate collection / sealing - basal liner	6.2.1	COA report/ monitoring reports	Compliant with licence	Breach of licence condition	For leachate accumulation exceedances, four or more minor breaches. For the rest of the condition, a repeated minor is not applicable	As above	Causes Category 1 (major) or Category 2 (significant) environmental event	
Capping	6.3.1	COA report	Compliant with licence	Breach of licence condition	N/A	As above	Causes Category 1 (major) or Category 2 (significant) environmental event	ELC where detail of cap defined.
Resistivity test	6.6.4	COA report	Compliant with licence	Breach of licence condition	N/A	As above	Causes Category 1 (major) or Category 2 (significant) environmental event	
Landfill gas management systems	8.1.3	Inspection / COA	Compliant with licence	Breach of licence condition	Four or more minor breaches	As above	Causes Category 1 (major) or Category 2 (significant) environmental event	
ELC parameter	Typical licence condition no.	Data source	No breaches	Minor breach(es) or minor environmental event(s)	Repeated minor breaches or events	Gross breach	Significant breach(es)	Comments
Process ELCs (c)-Water - descriptive conditions:								
No significant oil			No significant oil			Equivalent to a category 1 or 2 environmental event. Continuous oil sheen in discharge and downstream, or presence of oil in stones and vegetation downstream (for a significant distance).		

No significant sewage solids		Inspection	No significant sewage solids	N/A	N/A	N/A	Equivalent to a category 1 or 2 environmental event. Smothering of stream bed around outfall and/or significant solids identifiable downstream.	
No significant discoloration	No significant discoloration		Equivalent to a category 1 or 2 environmental event. Discoloration visible for a distance of greater than one river width downstream.					
No significant foaming	No significant foaming		Equivalent to a category 1 or 2 environmental event. Significant difference downstream compared to upstream.					
No significant sewage fungus	No significant sewage fungus		Equivalent to a category 1 or 2 environmental event. Bed of stream blanketed with sewage fungus or tufts of fungus visible over greater than one river width downstream.					
Environmental Events (classified according to table 9)								
Environmental harm	1.11	Inspection / environmental events	No environmental harm	Minor environmental event (category 3) which is not caused by discharge in full compliance with licensed conditions (e.g. due to a spillage on site etc) and which is not accounted for elsewhere.	Four or more minor breaches	N/A	Major (category 1) or Significant (category 2) environmental event which is not caused by discharge in full compliance with licensed conditions and not accounted for elsewhere	
Overall ELC band								

Environmental management					
EMC attribute	Applicable to this site / Licence condition no.	Compliant	Minor non-compliance	Major non-compliance	Comments
Management					
Knowledge of licence by appropriate staff		Relevant staff have a detailed knowledge of the permit and/or its requirements (eg through written procedures) and operate the procedures to ensure compliance with the permit. It is good practice to train all relevant (including operational) staff on the regulatory implications of the permit and all potential environmental impacts (under normal and abnormal circumstances).	Current permit difficult to obtain Only the 'responsible' person deals with permit issues	Current permit unobtainable	
Management plan		Appropriate management plan(s) in place; properly resourced and monitored.	Management plan is poorly resourced for achievement.	No management plan	
Managerial structure / commitment		Effective EMS in place that includes an environmental policy and programme, and a commitment by the operator to continual improvement and prevention of pollution. EMS identifies and sets the management structure including the setting, monitoring and review of environmental objectives (including compliance with permit conditions) and key performance indicators. Operator has demonstrable procedures (eg written instructions) that incorporate environmental considerations into process control, design, construction, maintenance, capital projects (including decommissioning) etc. Environmental objectives are set, monitored and reviewed.	EMS in place, but is incomplete or inappropriate for the installation (ie overly simplistic for a complex activity). EMS may not be fully effective or there is no evidence of the operator committing to it No clear allocation of responsibilities for environmental performance including compliance with permit Environmental policy available but compliance/commitment not evident Defined management structure but limited organisation commitment to permit compliance	No EMS No / limited procedures exist to ensure compliance with the permit No commitment to environmental compliance Systems and procedures in place but unfit for purpose or are not used	
Staffing		EMS contains assessment of minimum required staffing levels to manage and mitigate environmental risks involved in operation of installation. EMS contains procedures and actions to take in the event of staffing levels falling below the minimum required. Staff are competent in their required roles.	EMS recognises requirement for assessment of staffing levels but no formal assessment has been undertaken. Occasionally the installation operates with lower levels of staffing than required	No assessment of required minimum staffing levels Installation operated with low level of staffing such that environmental risk cannot be reduced or mitigated. Staff are not competent in their role. Contractors/visitors not properly controlled/supervised.	
Training		Training should include the EMS and written procedures including operational procedures, those associated with a breach of permit condition, prevention of accidental emissions and actions to be taken when accidental emissions occur. All relevant staff have training needs identified and are receiving relevant training in accordance with their job function to ensure suitable competence. All managers have environmental training suitable for the position in the organisation. A contractor/visitor site induction/training programme is in place and used.	Some general environmental training given. Some basic training requirements identified and given. Limited environmental training available to managers. Training of contractors/visitors limited.	No environmental training available. No assessment of training needs made. No training/induction of contractors/visitors.	
Monitoring and control systems / procedures		Documented operating procedures for process operations in place and used effectively (including emission monitoring systems) to monitor on a regular basis the performance against the permit. Responsible person/managers aware of all environmental effects from operation under normal and abnormal circumstances. Infrequent process deviations. Good control of process operation, shift handover and non-routine operations.	Frequent process deviations. Management of change procedure prepared but not used. Poor control of process operations, shift handovers or non routine operations.	No management of change system in place. No system to change operations due to complaints, near misses or incidents. Dropping process deviations. Very poor control of process operations, shift handovers or non routine operations. No / poorly written procedures or instructions where they have been deemed necessary.	

Emergency response procedures (incident plans / response to incident (short term))	Emergency response procedures in place that clearly identify environmental implications and actions to take with suitable testing regime. Accident plan in place that includes risk assessments of foreseeable scenarios to minimise potential occurrences and/or impacts. Incident information is used to prevent repetition of incidents. Near miss reporting is used to proactively control incident avoidance. Accident plans include approach to community relations. Timely response to incidents to prevent and mitigate the impacts of the release. Follow-up investigations and reports prepared. Any impacts promptly remediated.	Limited accident plan in place with minimal risk assessment of foreseeable scenarios and actions taken to mitigate potential occurrences and/or impacts. Limited response to incident to stop release but with little or no follow-up to remediate any impacts.	No emergency response procedures. No / ineffectual response to incidents.	
Plant and infrastructure				
Condition of plant, equipment and infrastructure	Plant and equipment operated without frequent breakdown or is operated without release to the environment outwith the scope of the permit. Site infrastructure fit for purpose.	Some plant and equipment subject to frequent breakdowns and/or operation leads to minor releases outwith scope of permit. Site infrastructure has minor defects which may contribute to pollution impact.	Plant and equipment subject to frequent breakdowns and/or operation leads to releases to the environment outwith the scope of the permit. Site infrastructure (eg bunding, drains, interceptors, etc.) not fit for purpose.	
Monitoring equipment	Monitoring equipment required by permit installed and operating with few, if any, breakdowns.	Monitoring equipment required by permit installed but unreliable and subject to frequent breakdowns.	Monitoring equipment required by permit not installed or not working for extended periods of time.	
Maintenance of processes, plant and installation to relevant standards	Maintenance programme in place and implemented. Maintenance programme takes into account environmental effects of breakdowns and maintenance operations. Maintenance programme contains systems to analyse faults and to prevent recurrences. Appropriate precautions in place to prevent pollution due to maintenance activities. Uncontrolled releases due to plant breakdown and maintenance activities are small and insignificant, not requiring notification to SEPA as an 'incident'. Maintenance undertaken to a relevant standard. Shutdown periods and preventative maintenance based on risk assessment or as a minimum on manufacturer's recommendations. Condition of plant, equipment and instrumentation (including static items such as tanks, pipe work bunding, etc) regularly monitored, tested and calibrated to ensure installation functions as intended. Permit to work systems recognise environmental issues including appropriate checks before plant and equipment start up after maintenance activities.	Maintenance programme not fully implemented. Maintenance programme based on shut down periods but little or no basic preventative maintenance (lubrication/cleaning) occurs between times. Some modifiable uncontrolled releases resulting due to plant breakdown and maintenance activities. Limited recognition within permit to work systems of environmental issues associated with maintenance activities.	High frequency of breakdowns/maintenance resulting in environmental incidents. Maintenance takes no account of environmental effects of plant breakdowns. No coherent maintenance programme in place. Equipment performance deteriorates significantly between maintenance activities. No recognition of environmental issues within maintenance activities.	
Implementation of monitoring / testing / calibration programmes	Required monitoring programmes undertaken on time to the recognised or agreed standard	Required monitoring programmes undertaken but not to the frequency specified in the permit or on time or not to a recognised standard.	No ongoing calibration of monitoring equipment. Required monitoring programmes not undertaken.	
Spare part availability	All relevant plant and equipment scheduled into a maintenance programme. Critical environmental plant spare parts held on site or easily available.	Spares not readily available.	No assessment of critical spare parts. Frequent breakdowns and delays repairing plant due to lack of spare parts or delays in getting spare parts.	
Reporting and recording				
Record keeping	Records kept in systematic manner. Records kept as specified in permit. Records legible. Training records maintained.	Some records not kept or do not comply with the requirements of the permit.	Failure to record a significant proportion of data required by the permit.	
Information and records available as required by licence	Information and records readily available. Training records available. Permit information used to improve performance. Relevant staff are aware of recorded information.	Records and information available but incomplete or inadequate quality for compliance with permit. Limited use of information in process management.	Limited or non-existent monitoring records.	
Reports to SEPA required under licence	Reports are prepared and submitted on time, in the format specified and are of appropriate quality and content.	Reports are prepared but submitted late, or do not follow the format specified or are not of the appropriate quality and content.	Non-ELC reports are not prepared or submitted, or where any reports are submitted they are of very poor quality or content.	
Notification of incidents	Incidents are notified promptly and include the required information specified in the permit. Operator is proactive in discussing incidents and events.	Notification of incidents is not consistent (ie some are notified but not all). Incident notifications do not comply with the information requirements specified in the permit.	Incidents are not notified	
Overall EMC band				
Overall compliance band				