

Compliance Assessment Report

Report ID:
CAR_NRW0031452

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

Site	Teifi Park Abattoir EPR/BV9683IH	Permit Ref	BV9683IH		
Operator/Permit holder	Dunbia (Wales) Ltd				
Regime	Installations				
Date of assessment	14/03/2017	Time in	11:00	Out	15:00
Assessment type	Audit				
Parts of the permit assessed	1.1, 1.5, 2.3, 2.8, 3.1,3.2, 3.4,				
Lead officer's name	Taylor, Richard				
Accompanied by					
Recipient's name/position	Victoria Kerr/ Group Environment Manager	Date issued	03/04/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (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	CCS Category	Condition(s) breached
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KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for 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 (eg. 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 advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Dunbia site audit 14th March 2017

Present; Zoe Nugent and Maxine Gregson (Dunbia)

Richard Taylor (Natural Resources Wales)

An agenda was sent to the site prior to the meeting.

1. Business update

Site reached the end of a period of maximum production prior to Christmas 2016. At the time of the inspection the site operated a 4 days per week kill with approximately 500 personnel employed. From an NRW perspective, the site remains under the EPR legislation until the repercussions of Brexit are felt. However, no changes to the Welsh Regulating body are expected for at least the next 5 years.

2. Annual Returns and E-PRTR

NRW records show site submitted the E-PRTR returns on time on 1st March 2017.

Site also submitted the following annual returns in accordance with their permit requirements on time.

a. Energy 1

b. Sewer 1

c. Water Use 1

d. Performance 1

e. 2016 Annual Performance report – this includes an analysis of the reports above plus production key performance indicators and annual waste throughput.

Note – waste data was previously a permit requirement to be submitted on form R1 annually. However, this requirement was dropped (ref CAR form dated 24th May 2016). Permit variation V3 now replaces the previous reporting requirements for the site. This was previously detailed in CAR ref 5569 dated 25th Feb 2017. Variation 3 laid down the current reporting requirements and supersedes both previous permits. However, some clarification was required on the day over the wording of the current site permit (V003) where under 4.2.5 the site is required to report quarterly waste inputs and outputs from the site. These were to be made on the 'form made available for this purpose'. However no specific form appears to have been issued with the permit. Instead, the waste data is currently captured on annual E-PRTR returns and annual requirements specified in table S4.3 –waste disposal and recovery (t/yr.). It appeared that Quarterly inputs and outputs have not been reported as required under this permit condition. NRW needed

to clarify why the quarterly waste returns have not been submitted and asked the site to provide the answer.

Action – Site to explain why Permit condition 4.2.5 has not been met. – Update. Site provided an explanation that the permit variation conditions concerning waste inputs arise from the Company running a nearby seasonal slaughterhouse at Nantmel where the effluent is allowed to be processed at the permitted site at schedule S2.1 of the V003 permit where 32,500 tonnes per year is permitted of waste type 02 02 01 – sludges from washing and cleaning (food preparation and processing). Site declared in their annual report that no inputs were received from Nantmel during 2016 and annual reporting of imported effluent is a permit requirement of Table S4.3 – Performance parameters.

NRW accepts that no waste has been received from the seasonal abattoir in 2016, and that we did not provide a reporting form for Dunbia to report its quarterly returns under 4.2.5. We accept that there was a historical arrangement for quarterly waste returns to be made annually, but we will provide a form for future quarterly reporting of the Nantmel inputs to the permitted sites effluent treatment plant at Llanybydder. This is issued with this CAR form and seeks to restore the capture of the monthly returns detailed in Table S2.1. Blank or Nil returns are required.

Previous quarterly data is not required. NRW do not impose a penalty for not meeting permit condition 4.2.5 because we accept that we did not meet the provision of a form when we issued the current permit on 13th June 2013.

Decision – NRW provides Form 4.2.5 for the permitted site to implement condition 4.2.5 where quarterly inputs to the effluent treatment plant are to be reported within 28 days of the end of the quarter.

NRW Action – Draft required form as required by permit condition 4.2.5. NRW accepts that we appear to have not issued the required form when the permit was issued in 2013 and have included Form 4.2.5 for the purposes of capturing the quarterly data.

1. Odour Control Measures

Site have a permit condition to minimise any odour offsite to levels below ‘a level likely to cause pollution’. This level was defined further in CAR form dated 18th May 2016 with reference to the sites odour management plan and EA H4 guidance, and is defined as the point at which site triggers further action.

Site have a history of odour complaints. However the last complaint received by NRW was 19th Dec 2016 and was unsubstantiated. There have been no odour complaints made against site to date in 2017. No odour was detected beyond the site at the time of this inspection.

Site operate an odour management plan which was approved by NRW. Potential sources of odour are identified on the plan, but the site was inspected on the day for likely sources and found to meet acceptable standards. There are several potential sources of odour such as seen in the skin shed, and the effluent treatment plant. However, the potential odour from the effluent stream and skin shed were seen to be contained as far as practicably possible by enclosure behind steel roller doors.

Several grates are potential sources, but the danger of expansion of effluent gases has to be balanced with the risk of odour. Therefore the open mesh grates in use are seen as a compromise between Health and Safety requirements and odour control. The same balance was seen in the employment of York boarding on the lairage area walls. Even though this is another potential odour source, the requirement for air movement without fans was seen as a balance between livestock welfare and potential odour generation. The management of the throughput of wastes therefore is crucial to the minimisation of potential odour sources. It was observed that the waste was speedily processed at the time of the inspection, and work areas continually washed down to minimise odour. Cleaning and processing regimes were well coordinated so that waste and the subsequent odour production was minimised. The site also employs covered containers throughout the site, and has a policy of operating with roller doors closed unless removing waste. From the site inspection it was concluded that site is conforming to its permit conditions by using

appropriate measures, but if there are any unscheduled blockages in the process flow, then the risk of odour to the community is increased by the time any wastes or by-products spend awaiting processing.

2. Noise control measures

The site has a permit condition to ensure that noise and vibration is limited to 'levels likely to cause pollution outside the site'. The site has a history of noise complaints made against it and has a noise abatement plan in place. The last recorded noise complaint made against the site was 5th Nov 2015. Site have made several improvements but the risk of noise complaints in the area still remains because of the hum of machinery and vehicle movements during production hours which are seasonal. These has been minimised through control, maintenance and enclosure, plus some modifications to potential noise sources, i.e., swan neck roof vents. At the time of the inspection no excess noise or vibration was experienced offsite, but the noise from the plant was heard at low levels off site. This was judged to be at an insignificant level by the site inspector during the visit in day time hours, but the risk of annoyance to locals may rise during night time production when the ambient background levels drop. Therefore site needs to remain vigilant and maintain its noise management plan and permit conditions to manage noise levels to a point where offsite pollution is minimised. At the time of the inspection site was seen to be within compliance to this permit condition.

3. Effluent system records

A question over how the site accounts for its water/effluent use on site arose when the site reported total water on site as approximately half the amount of the total reported from their quarterly returns for 2016. 94,000m³ against 174,000m³. This had potential repercussions for the sites key performance indicators for water use. However this apparent discrepancy was clarified as follows;

Source	Component	2016 total	Outlet
Total water use	Mains water + abstracted water	94,830m3	W2 Effluent treatment plant
Quarterly returns total	Mains + abstract +gut content +surface runoff	174,105m3	W2 Effluent treatment plant
W1	Surface water run-off	86,933m3	W1
S1	Sewerage from site	Nil	S1

The KPI for water use per tonne of product therefore is calculated from the mains water input plus the abstracted water. The same method is calculated for all abattoirs within the Dunbia group.

1. Permit Variation 3 Queries

There were some apparent discrepancies with schedule 2 of permit BV9683IH/V003. After consultation with the Decision document for V3 from NRW permitting team it is clear that the schedule refers to the limits of effluent (32,500m3 per annum) allowed to be processed through the sites effluent treatment plant per annum – as in point 2(e) above. It is not a limit imposed for the amount of effluent the plant is permitted to treat per year. This condition should be read in conjunction with the permit decision document and not be

confused with the effluent treatment plant capacity.

Also, the schedule refers to EWC 02 02 01 – sludges from washing and cleaning. Again, this only applies to the incoming effluent brought into site.

2. Site Tour

The conditions were dry with a slight SW wind with temperatures of approximately 12°C. The gut content processing operation was viewed. Several operatives were employed in this area where several waste types and meat destined for further processing elsewhere meet. Roller shutter doors are used to lock this area off at end of shift, and the area is constantly washed down. The area was clean and tidy with several dolav containers of different colours employed for the multiple streams present. No excessive odour was being produced nor noise. The speed of processing the wastes was observed to be a key factor in controlling and minimising the potential emissions of odour. Caution must be taken with safety not being compromised for speed of processing. Forklift truck drivers operate within this area without reversing alarms fitted. Site should remind operators of the speed limits within the site to reduce the risk of accidents and consider a reversing alarm to be installed on the forklift which suitable to warn other personnel in the vicinity, but quiet enough to not produce excess noise to neighbouring properties.

One area of concern was the drop height of the gut content which produced a splash of fluid each time there was a drop of content into the open container. There is an Operator in this area who can be directly affected by this, and the splash can travel several feet in all directions, thus potentially contaminating the area, and being a hazard for the personnel working in the vicinity. Site should consider minimising this drop height so that the splash is controlled more effectively.

No birds, or insect pests, or vermin were seen during the inspection. The site was remarkably clean and well managed. The security fence around the site perimeter was unbroken and the site runs a 24 hour security cabin on site.

The effluent treatment plant was viewed. Roller shutter doors were down to minimise any odour from this plant. Inside, there is a strong constant odour which was enclosed by the building, so the closure of the roller door is an important barrier to odour in the community.

The outlet points to S1 and W1 were viewed. The daily sample position was seen. A discussion took place over whether it would be more representative for the sample to be taken at the W2 treated effluent outlet to the river Teifi, and for a holding tank/pond to be used as a buffer for any potential polluted effluent to be held before it is released. Site representatives agreed that the risk of pollution entering the Teifi was minimal and that the measures in place were adequate for the process. A future improvement area would be to evaluate the holding capacity on site with a view to increasing the temporary capacity to offset the risk of pollution.

Figure 1. W2 Treated Effluent outlet on the River Teifi with the North fence of the site shown in the background.



The Outfall to the river was viewed. This is some 100m away from the effluent outlet and is serviced via an underground pipe. The outlet is on the property of the neighbouring estate. The effluent being discharged to the river was seen to be clear and without odour.

1. Brush up meeting

The Dunbia group senior environmental Officer joined the meeting via telephone. RT congratulated the site in general on the cleanliness observed as well as the noise and odour minimisation measures in place.

Points 5 & 6 were raised for discussion and accepted. The potential improvement points raised in the site tour were not raised, namely;

- a. Accident risk by reversing forklifts.
- b. Review the drop height of the gut content to exterior bins.
- c. Review the holding capacity of the effluent on site.

This is because they are potential areas of improvement observed at the time of the inspection, not recommendations for improvement. It is the site's responsibility to ensure these issues are met under Health and Safety policy and work management systems. Site are entitled to dismiss these concerns if they feel they have been sufficiently incorporated into their systems already, but NRW Officers have a duty to raise any cross policy concerns to the attention of the site they are inspecting.

- d. The evaluation of the annual site returns took place after the meeting and the list of recommendations is notified via this CAR form.

Summary;

Permit condition	Item	Action required
Permit V3 condition 4.2.5	Quarterly waste in/out data.	Site have explained that this applies to the seasonal inputs from the Nantmel site. NRW have issued Form 4.2.5 with this CAR form for site to submit quarterly input output data from this seasonal site. Site are now required to provide quarterly data (due 28th Apr for Q1 2017) and every subsequent quarter for waste effluent inputs to the ETP from the Nantmel site. (Nil/blank returns are required).

No non-compliances were observed at the time of the inspection.

Note - K Dunn CAR ref 5569 dated 25th Feb 2017 – lays requirement that V3 supersedes all other permit reporting requirements.

END.

EPR Compliance Assessment Report

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CAR_NRW0031452**

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Site	Teifi Park Abbatoir EPR/BV9683IH	Permit Ref	BV9683IH
Operator/Permit holder	Dunbia (Wales) Ltd	Date	14/03/2017

Section 3 – Enforcement Response

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.

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.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

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 verbally or 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 that 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 Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW 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 (eg. 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
- Assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Regulations request

The NRW 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 NRW 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 fifteen working 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 officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.