

Compliance Assessment Report

Report ID:
CAR_NRW0032165

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	24/07/2017	Time in	10:00	Out	15:00	
Assessment type	Audit					
Parts of the permit assessed	tanks and bunds					
Lead officer's name	Taylor, Richard					
Accompanied by						
Recipient's name/position	Zoe Nugent/ HSEQ Manager	Date issued	15/09/2017			

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

The purpose of this CAR form is record the actions and recommendations made by the tanks and bunds audit which took place on 24th July 2017.

1. Tanks and Bunds Audit.

Dunbia (Wales) Ltd operate a licensed abattoir in Llanybydder, on the Carmarthenshire/Ceredigion border. Natural Resources Wales (NRW) are the regulating body for the environmental permit operated by Dunbia.

NRW conducted an audit on 24th Aug 2017 which focussed on the tanks and bunds that the site operates at Llanybydder. The following is a summary of the audit. The full version was sent to site along with this CAR form.

Permit BV9683IH carries the following conditions which tanks and bunds adhere to;

1.1.1(a) – The Operator shall maintain and implement a management system which identifies and minimises risks of pollution including those arising from operators, maintenance, accidents, incidents, non-conformances, (b) using sufficient competent persons or resources.

1.1.2 – Records demonstrating compliance with condition 1.1.1 shall be maintained

3.2.3 – All liquids in containers whose emissions to water or land could cause pollution shall be provided with secondary containment, unless the Operator has used other appropriate measures to prevent and minimise leakage and spillage from the primary container.

Actions and Recommendations from Tanks and Bunds Audit 24th July 2017.

1. Recording all data.	Large tank integrity annual checks do not record that all tanks have been inspected, only tanks with maintenance issues.	Recommend that all tank and bund checks are recorded for their findings not just ones with issues.
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2. Bund residue Is there a check in place to remove debris/rainwater?	 CIRIA guidance C736 at box 5.2; recommends daily checks to include daily removal of rainwater whilst ensuring this is not lost product which would indicate leakage.	Weekly checks highlight comments on the bund capacity – maintenance then acts accordingly. Site has a visual set line within the bund which when overtopped triggers the need for this to be emptied. This is a reactive system which allows pooled water and debris to stand in the bottom of the bund. This reduces the capacity of the 110% spillage allowance as well as allowing a potential odour source to stand venting to atmosphere unchecked. An oil sheen was seen on the liquid within the bund. Joints and pipes are covered in the liquid. This may reduce the functionality of the pipework infrastructure. <i>NRW recommend that Dunbia review the practice of allowing liquid to stand inside bunds and adopt the best practice of CIRIA 736 where bunds are checked and emptied daily, and recorded.</i>
3. AMP	Accident Manangement plan (AMP) Fire caused by catastrophic failure of tanks given a low priority at table 4. Containment and clean up needs an additional paragraph at 5.1.	Add a phrase to AMP at 5.1 to the effect that actions taken will not compromise personnel safety.
4. Others 5 Yearly ground water and soil risk assessment.	Cracks in concrete bases around chemical stores and water storage tanks seen. The report submitted for review on 26th July asserts that there are no significant cracks in the hardstanding areas. At the inspection NRW found cracks which dispute this claim. This brings into question the risk assessment approach which Dunbia is adopting for the groundwater reports because there is a heightened risk of pollution ingress through the hardstanding areas. The areas where cracking was seen was around the chemical store. This is an area where Dunbia (Wales) Ltd incurred a minor Cat 4 non compliance for a minor chemical leakage into the bund in CAR form	<i>Recommendation – Carry out repairs to seal the gaps.</i> <i>Include concrete hardstanding areas within the site tanks and bunds checks.</i> Recommend review of the groundwater and risk assessment draft to include the cracks highlighted by this CAR form and the accompanying Tanks and Bunds report. Site to reassess their approach to the groundwater/soil risk assessment approach in light of the increased risk of pollution to groundwater through the concrete cracks and the risk of pollutants present.

	CAR0000079 dated 12/5/16. No pollution was seen at the time, but the incident raises the risk posed by having cracks in the concrete in the vicinity. Site need to reassess whether the risk assessment approach is adequate. A groundwater/soil baseline investigation would offer comprehensive evidence on the current status of the groundwater and soil under the site.	
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EPR Compliance Assessment Report

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Site	Teifi Park Abbatoir EPR/BV9683IH	Permit Ref	BV9683IH
Operator/Permit holder	Dunbia (Wales) Ltd	Date	24/07/2017

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.

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.

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.