

	EPR Compliance Assessment Report	Report ID: BL9941IC/0231792			
This form will report compliance with your permit as determined by an NRW officer					
Site	SOUTH CAERNARFON CREAMERIES		Permit Ref	BL9941IC	
Operator/ Permit holder	SOUTH CAERNARFON CREAMERIES LTD				
Date	11/02/2015		Time in	10:30	Out 13:50
What parts of the permit were assessed	Site development, follow up resource efficiency and ETP BAT review, Site Inspection				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
					Water Discharge
Recipient's name/position	Elwyn Jones - Factory Manager				
Officer's name	Lara Cubley		Date issued	13/02/2015	

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	
a) Permitted activities	1. Specified by permit	A			
b) Infrastructure	1. Engineering for prevention & control of pollution	N			
	2. Closure & decommissioning	N			
	3. Site drainage engineering (clean & foul)	N			
	4. Containment of stored materials	A			
	5. Plant and equipment	N			
c) General management	1. Staff competency/ training	N			
	2. Management system & operating procedures	N			
	3. Materials acceptance	N			
	4. Storage handling, labelling, segregation	N			
d) Incident management	1. Site security	N			
	2. Accident, emergency & incident planning	N			
e) Emissions	1. Air	N			
	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	A			
	4. Pests, birds & scavengers	A			
	5. Deposits on road	A			
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	A			
	2. Energy	A			
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	0	Total compliance score (see section 5 for scoring scheme)	0
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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.

Update on Site Development (Construction of new Cheese Production Department)

The site is still planning a 2 phased development with phase 1, the new cheese manufacturing facility, commencing imminently. The Operator was under the impression from consultant advice that the variation would be administrative or minor technical. The Operator was advised that the change does not fit the definition of such a variation but that of a Normal Variation. **The application must be made as soon as possible. The Operator may proceed with development at his own risk.** Inspector is to send guidance and links to application forms, confirm cost of application, and key environmental issues to cover.

The Operator is urged to seek our advice or guidance on any issues associated with the application and we are happy to attend meetings.

Discussions were held surrounding drainage plans for the new department. It is understood that surface water drainage external to the existing building that is to be developed will remain unchanged. Any IBCs stored externally will be within bunding/secondary containment. All other storage (including milk and whey buffer tanks) will be internal, with newly constructed sealed floors, and drainage to current industry standards. Effluent will drain to a main sump for pumping over the Afon Erch to the current ETP. Duty and standby pumps to prevent overtopping and pollution should be included. All milk, whey, steam generation will remain as present with new stainless steel pipework crossing the Afon Erch. The Operator will have to justify that new equipment and techniques meet BAT as part of the variation application process.

Inspector to check and advice on any requirements for work near the watercourse and crossings which may be subject to additional land drainage consent.

The Operator will send drainage plans to NRW for review and advice.

Resource Efficiency Update

The Operator has made good progress with developing KPIs and benchmarking against industry standards. **However, he must ensure Fuel is also represented in these figures.**

Water use is currently a bit higher than industry benchmarks but the Operator has reported issues with the well overproducing. This means not all water is going into production but some is being put back into the Afon Erch.

The Operator must ensure metering and sub metering is designed into the new plant in accordance with BAT.

The COD lost to ETP also looks high in comparison to the 1.5% benchmark for simple milk processing sites. However, it is encouraging to see that this figure is reviewed on a daily basis in production meetings. Inspector to check calculations and whether this installation would be considered 'simple milk processing'.

The Operator must continue the good process, gather data for the new plant and set his own targets.

ETP BAT Review

This review in accordance with the requirements of the Enforcement Notice has been completed. The findings were discussed with particular attention to the following NRW concerns:

The Operator needs to be aware of the design limit of 500m³ for the current DAF. The EPT is currently performing well and meets the Permit emission limit values, however, should effluent volume or strength increase the need for an additional DAF would have to be considered.

T7 diversion tank – there is currently no diversion tank available, following the DAF, in the event of an emergency. However, there is a turbidity meter which alarms and alerts the Operator. Such an improvement to enable the BAT standard to be achieved is recognised as a priority and the Operator reports that this should be completed as part of the Phase 1 development.

T33 Filtration is not currently conducted as part of the ETP process. The lamella is a sedimentation process. The ETP is currently performing well and meets the Permit emission limit values. Should tighter BAT ELVs or effluent volume/strength increase, causing problems with suspended solids or Phosphate, then the need for filtration will have to be considered.

Additional Sludge Storage & Dewatering – the Operator is looking into solutions for this which are likely to involve dewatering of sludge. This is likely to take place following Phase 1 of the development.

Site Inspection & Review of ETP Records

All records inspected were completed to a good standard.

The Operator is advised to add a record of checking turbidity results for the new continuous turbidity monitor on the

computer screen on a daily basis as per ETP27 on M04 daily checklist.

Some clear coloured run-off was noted at the back of the cheese department by a tanker. The Operator was advised to ensure any contaminated run-off is contained.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

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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.			
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.			X
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.

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 Natural Resources Wales (NRW) to fulfill 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 (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 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 twenty 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 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 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.