



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

Site	Rowan Foods	Permit Ref	WP3534GX		
Operator/ Permit holder	Oscar Mayer Limited				
Date	16/10/2013	Time in	10:00	Out	17:15
What parts of the permit were assessed	Accident Management, Maintenance, ETP controls and monitoring, Competency and training.				
Assessment	Audit	EPR Activity:	Installation	X	Waste Op
					Water Discharge
Recipient's name/position	Steve Meek/Technical Director				
Officer's name	Lara Cubley, Aled Zachary	Date issued	20/11/2013		

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	N	
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	N	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	A	
	2. Management system & operating procedures	C3	1.1.1
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	A	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	A	
	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	A	
	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

Number of breaches recorded

1

Total compliance score
(see section 5 for scoring scheme)

4

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.

Accident Management

The Operator has a Pollution Control Policy, Document reference 2.10.h, which identifies accident situations, their risk, and control measures. This was submitted as part of the application and was last revised 23/04/13. There also exists an up-to-date aspects register which includes emergency situations. These documents appear to identify all foreseeable accident scenarios for the site.

The operator provided a copy of Emergency Procedures for the site, revision 9 dated 06/06/2013. This covers fire, release of ammonia, spillage, and bomb/terrorist threat. The procedure, Unloading and Storage of Cleaning Chemicals reference 5.7.4.192 dated 16/12/08 was also provided. This makes reference to another spillage procedure, 5.1.1, to that in the Emergency Procedures but instead contained in the quality manual. **It is advisable that there be only one spillage procedure.**

It is recommended that the Unloading and Storage of Cleaning Chemicals Procedure be reviewed as this has not been conducted since 2008. The Operator must ensure that all procedures are reviewed in a timely manner.

It was noted that the penstock valve is closed in the approximately weekly delivery of chemicals due to the location of unloading in the proximity to surface water drains. **This should be included in the procedure together with the requirement to keep records of this action being undertaken as demonstrated on the spreadsheet held by security.**

Controls for accident prevention were good with a reduced inventory of chemicals being stored correctly on site. **The Operator is improving segregation of acids and alkalis, which should be completed shortly.** Small volumes are stored locally inside the building at points of use. There are careful controls on dosing and dead man's handles in operation to help minimise the potential risks posed.

The Spillage section of the Emergency Procedures links to a reporting form with good clear instructions of the requirements to notify to the Environment Agency, (now NRW), in accordance with the Permit. However, there is no such link for the fire section. There is also no mention of closing the penstock valve in the fire section. **It is recommended that closure of the penstock valve be included in the fire procedure and that the requirement to notify be brought into the main body of text.**

Maintenance

Maintenance is scheduled via a computer system which was not seen on the day. This includes the boilers, ammonia plant, and ETP. There are two ammonia plant rooms in which oil from rectifiers is drained on a monthly basis. Oil is topped up regularly with daily and weekly checks conducted. The contractor that installed the refrigeration system is used to conduct any repairs as required with no formal maintenance contract in place. Checks for air leaks to the compressed air system are conducted on a daily basis.

At the ETP the sludge and 3 settling tanks are reportedly integrity checked on a 5 yearly basis and the 2 pumps are serviced every 3 years. This is contrary to manufacturers recommendations requiring an annual service but reportedly due to this being financially prohibitive. Pumps operate as duty and standby and regular checks are undertaken.

There was not enough time to cover maintenance to the depth required. A small amount of paperwork was reviewed to ensure records are kept of maintenance undertaken. **Further review and follow up will be conducted at future audits.**

Currently, it is understood that close out of all planned maintenance is not monitored in management meetings. **It is advisable that this be undertaken.**

ETP process controls and monitoring

A process flow of the ETP was provided. Procedures are in place for monitoring and checks of the ETP on a daily basis with continuous monitoring of pH, temperature, flow, and Suspended Solids. The pH meter is calibrated on a weekly basis and the Solids probe cleaned. However, there are no records of this having being undertaken. **The Operator is advised to ensure a record of such checks is made.**

The on-site labs have procedures for analysing the daily spot sample. However, it was noted that on occasions the analytical range of up to 750ppm for suspended solids is exceeded without further action/dilution. **This method should be modified to ensure the accuracy of the data is maintained.**

Despite continuous monitoring of some determinands there is no automatic alarm on approach to DCWW consent limits. The data is just downloaded on a weekly basis and sent to management. Daily composite sample analysis results are checked for compliance with DCWW consent limits. However, there is little use of this data. **It is recommended that this data be used for not just compliance assessment but also preventative action and trending so as to inform management decisions and improvements.**

C2 Permit Condition 1.1.1, CCS3 – Procedures for the monitoring and control of the ETP require some improvement as detailed above.

Training, competency, and resources

The Operator has a training matrix which covers all employees. All employees have an induction, which covers spills with frequencies for renewal under review. If issues arise then they are tackled. This may be through additional training, if required. Depending on responsibilities essential training required for the job is assessed and documented on individual records. A couple of records for yard operatives were reviewed and demonstrated up to date training in relevant environmental procedures such as re-fuelling, chemical handling, and spillages. As required by the BRC the length of time the training takes is recorded.

A contractors pack is provided to contractors and permits to work cover environmental impacts.

The group has a specialist advisor of environment and management with key responsibilities for environment have received relevant training.

Groundwater Abstraction

The borehole has been installed and holding tank are being constructed. The Operator will be trialling the use in a hot water gun system.

 Cyfoeth Naturiol Cymru Natural Resources Wales	EPR Compliance Assessment Report		Report ID: WP3534GX/0192549	
This form will report compliance with your permit as determined by an NRW officer				
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Operator/ Permit	Oscar Mayer Limited	Date	16/10/2013	

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.			
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.			X
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			
C2	C3	Improvements to some of the effluent monitoring procedures required as detailed in the texts of the report.	20/01/2014

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.

