

	EPR Compliance Assessment Report	Report ID: AP3833HZ/0242876			
This form will report compliance with your permit as determined by an NRW officer					
Site	Llangefni prepared meats		Permit Ref	AP3833HZ	
Operator/ Permit holder	WW&E (Wales And West England) Limited				
Date	24/06/2015		Time in	10:00	Out 17:00
What parts of the permit were assessed	Odour Control and Drainage Audit				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
					Water Discharge
Recipient's name/position	Steve Jones and Richard Bladon				
Officer's name	Matthew Kelk, Stuart Ross		Date issued	24/07/2015	

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	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	C3	2.3.5
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	C3	2.3.2
	2. Management system & operating procedures	C3	1.3.1
	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	C3	2.2.2.3
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	C3	2.2.6.1
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	C4	4.1.2, 4.1.3, 4.1.4, 4.1.5 and 5.1.5
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	6	Total compliance score (see section 5 for scoring scheme)	20.1
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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.

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.

On the 24 June 2015, a site inspection was carried out by Natural Resources Wales Officers Matthew Kelk and Stuart Ross. The inspection primarily concentrated on odour control and surface water drainage. During the inspection the following breaches of permit AP3833HZ were identified.

1. Sludge Tank

Condition 2.2.6.1:-

The Operator shall use BAT so as to prevent or where that is not practicable to reduce odorous emissions from the Permitted Installation, in particular by:-

Limiting the use of odorous materials,

Restricting Odorous Activities,

Controlling the storage conditions of odorous materials,

Controlling processing parameters to minimise the generation of odour,

Optimising the performance of abatement systems,

Timely monitoring, inspection and maintenance,

Employing where appropriate, an approved odour management plan.

Provided always that the techniques used by the Operator shall be no less effective than those described in the Application where relevant.

Condition 1.3.1:-

Without prejudice to the other conditions of this Permit, the Operator shall implement and maintain a management system, organisational structure and allocate resources that are sufficient to achieve compliance with the limits of this Permit.

Finding

During a walk around land external to the site, an odour was present in the vicinity that was not attributable to the lagoon process. Whilst on site it was evident that the foul air return pipe valve had been left open on the effluent sludge tank following a sludge tanker collection. This is bad practice as potential for foul air to be pushed out of the pipe as the tank fills with sludge.

2 Sisters Food Group (2SFG) have provided a management procedure for the collection of sludge. The site operative with overall responsibility for supervision of sludge collection when quizzed had forgotten to close the valve. The operative had failed to follow procedure.

Compliance/Action

The above breaches attract two category three CCS scores.

Procedure to be reviewed for sludge collection and staff responsible for overseeing sludge collection to be retrained in this aspect by 24 August 2015.

2. Effluent Screen

Condition 2.2.6.1:-

The Operator shall use BAT so as to prevent or where that is not practicable to reduce odorous emissions from the Permitted Installation, in particular by:-

Limiting the use of odorous materials,

Restricting Odorous Activities,

Controlling the storage conditions of odorous materials,

Controlling processing parameters to minimise the generation of odour,

Optimising the performance of abatement systems,

Timely monitoring, inspection and maintenance,

Employing where appropriate, an approved odour management plan.

Provided always that the techniques used by the Operator shall be no less effective than those described in the Application where relevant.

Condition 2.3.5

All plant and equipment used in operating the Permitted Installation, the failure of which could lead to an adverse impact on the environment, shall be maintained in good operating condition.

Finding

Evidence of effluent from the offal screening collection basket was running across the yard, NRW consider this is insufficient use of BAT to control the storage of odorous materials, effluent has the potential to create odour particularly in periods of warm weather. During the inspection the effluent screen housing door was missing due to poor maintenance providing insufficient protection against odour migration.

Compliance/Action

The above breaches attract one category three CCS score.

NRW request that site install a door to the effluent screen housing, instigate collection of screening effluent and to channel this via pipes to the effluent balance tank rather than letting it run across the primary yard. Action plan to NRW by 24 August 2015.

3. Emissions to Water

Condition 2.2.2.3:-

Emissions to water from the emission points specified in table 2.2.4 shall only arise from the sources specified in that Table.

Table 2.2.4: Emission point to water		
Emission Point Reference or description	Source	Receiving Water
W1	Uncontaminated Surface Water Drainage	River Cefni
W2	Uncontaminated Surface Water Drainage	River Cefni

Finding

On the 24 June 2015 NRW officers sampled the surface water drainage on site at the point at which the drainage system leaves the boundary of the site, a field test kit indicated high ammonia content in the water, as such a water sample was taken for further analysis. Lab results showed ammonia concentrations at 8.81mg/l and a BOD of 51.2mg/l.

The possible source of the contamination was tracked back to a large storm water tank (interceptor). When the tank cover was lifted there was a large amount of detritus in the tank. A further water sample was taken from this tank. Lab results showed ammonia concentrations at 44.8mg/l and a BOD of 860mg/l.

On the 25th June 2015, further samples were taken from the surface water drain on the boundary of the site, lab results returned an ammonia level of 1.86mg/l and BOD of 11.5mg/l.

This shows a level of minor contamination leaving the surface water drainage system which discharges into the River Cefni.

An investigation into the contaminated surface water discharge was received from site by NRW on 7 July 2015. The root cause was found to be number of factors including a build-up of silt in the oil separator chamber which had overflowed into the

holding tank and into the surface water outlet. Also it is believed that organic matter had been wash off from the cleaning of intake tractor units.

It was reported that the drainage system had received a lack of maintenance over previous years.

Compliance/Action

Condition 2.2.2.3 only permits discharge of uncontaminated surface water discharge and as such this condition has been breached.

Site has actioned the cleaning of the drainage system, weekly planned preventative maintenance and weekly service of drainage by a drainage contractor and to include annual cleaning and biannual skim. In addition to this physical measures are planned including the addition of an extra interceptor and drainage flap where the surface water drainage leaves the site.

Whilst the above measures mitigate against solid matter entering the surface water drainage, NRW are concerned that the investigation does not fully determine the source of the organic matter within the surface water drains and hence the high ammonia/BOD results.

As such NRW request that the site carry out a full drainage survey of the entire site to ensure that only clean/uncontaminated water enters the site surface water drainage. Action to be carried out by 24 October 2015.

The above breaches attract one category three CCS score.

4. Drainage Plan

Condition 1.3.1:-

Without prejudice to the other conditions of this Permit, the Operator shall implement and maintain a management system, organisational structure and allocate resources that are sufficient to achieve compliance with the limits of this Permit.

Finding

Following the the discovery of contamination in the surface water drains, at the time of the incident site staff could not find a full drainage plan as supplied to NRW at the time of the permit application.

Compliance/Action

Breach of condition 1.3.1, adequate drainage plans should be available at all times that identifies both surface and water foul drains and the final destination of any drain. Drainage plan has been located by site, staff should be made aware of its location by further training. Action to be completed by 24 August 2015.

5. Spillage Training

Condition 2.3.3:-

All staff shall be fully conversant with those aspects of the Permit conditions which are relevant to their duties and shall be provided with adequate professional technical development and training and written operating instructions to enable them to carry out their duties.

Finding

During a meeting between 2SFG and NRW in January 2015 and subsequent correspondence it was agreed by 2SFG that staff would be trained in spill kit training by April/May 2015.

As of the 24 June 2015 the above action has not been implemented.

Compliance/Action

To train staff and contractors with regards to spill training by 24 August 2015.

The above breach attracts one category three CCS score.

6. Effluent Balance Tank Odour Control

Condition 2.2.6.1:-

The Operator shall use BAT so as to prevent or where that is not practicable to reduce odorous emissions from the Permitted Installation, in particular by:-

Limiting the use of odorous materials,

Restricting Odorous Activities,

Controlling the storage conditions of odorous materials,

Controlling processing parameters to minimise the generation of odour,

Optimising the performance of abatement systems,

Timely monitoring, inspection and maintenance,

Employing where appropriate, an approved odour management plan.

Provided always that the techniques used by the Operator shall be no less effective than those described in the Application where relevant.

Finding

On the 24 February 2015, the single carbon filter on the effluent balance tank broke through leading to an offsite odour. After being advised on several previous occasions by NRW to fit a dual carbon filter 2SFG agreed to fit a dual filter. As of the 24 June 2014 the filter is on order.

Compliance/Action

Breach of condition 2.2.6.1.

2SFG to fit carbon filter to indicate to NRW timescales for the installation of the dual carbon filter by 24 August 2014.

7. Annual Returns

Monitoring conditions 4.1.2, 4.1.3, 4.1.4 and 4.1.5

Finding

The annual reporting requirements of the permit under the above conditions have not been submitted despite requests to.

Compliance/Action

Submit annual returns by 24 August 2015

Breach of conditions 4.1.2, 4.1.3, 4.1.4 and 4.1.5, the above breach attracts one category four CCS score.

8. Company Name on Environmental Permit

Condition 5.1.5.:-

The Operator shall notify the following matters to the Agency in writing with 14 days of their occurrence:-

Condition 5.1.5.1 Where the operator is a registered company:-

Any change in the Operator trading name, registered name or registered office address;

Any change to particulars of the Operator's ultimate holding company (including details of an ultimate holding company where an operator has become a subsidiary);

Any steps taken with a view to the Operator going into administration, entering into a company voluntary arrangement or being wound up.

Finding

As of the 24 June 2015 the permit for the site is registered in the name of Wales and West of England Ltd.

Compliance/Action

Permit to be transferred into 2SFG name, this has been actioned by Steve Jones as of 29 June 2015.

Advice and Guidance

Evidence of poor housekeeping around the blood tank, blood on the floor, product on the floor can lead to odour. Ensure that all blood spillages are cleared up straight away.

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Operator/ Permit	WW&E (Wales And West England) Limited	Date 24/06/2015

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.			
We will now consider what enforcement action is appropriate and notify you, referencing this form.			X

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			
B1	C3	See text for details	24/08/2015
C1	C3	See text for details	24/08/2015
C2	C3	See text for details	24/08/2015
E3	C3	See text for details	24/10/2015
F1	C3	See text for details	24/08/2015
G4	C4	See text for details	24/08/2015

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.