Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: AP3833HZ/0195957

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	11/12/2013			Time in	10:00	Out	12:15
What parts of the permit were assessed	Odour Control						
Assessment	Site Inspection	EPR Activity:	Installation X	Waste Op		Water Discharge	
Recipient's name/position	Stuart Dean / Gareth Jones						
Officer's name	Stuart Ross			Date issued	11/12/2013		

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	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	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	N	
	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	N	
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

	INITIALS	DATE
OK FOR PUBLIC REGISTER	SK	15/01/14
COPIED TO PUBLIC REGISTER	JB	EORM

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.

Comments

This Compliance Assessment Report follows a site inspection on 11/12/13.

1. Off Site Odour Assessment

Prior to the inspection an odour assessment was made downwind of the site. The wind was south / south westerly blowing across the site towards the town / adjacent car dealerships. No odour was noted at Lon Tudur or the Industrial Estate road. Odour was however noted on the road behind the abattoir and in front of Vauxhall Slaters / Elim Peugeot. This odour is best described as lairage / live bird with some other possible contributions. The odour was not particularly strong and is significantly less offensive since the scald de-feather scrubber was installed Jan 2013.

2. Effluent Balance Tank

Previous inspections have highlighted concern regarding the maintenance of the carbon filter fitted to abate odour from the effluent balance tank. It was reported that the filter was replaced and is now subject to weekly checks (records viewed). However, during the inspection strong odour was noted in the vicinity of the filter and when the filter was checked close up it was very odorous (the odour was similar to that in the ETP building). The odour was also confirmed by the site SHE Manager.

Clearly the filter / maintenance arrangements are not adequate in controlling odour from the tank. Failure to maintain the filter in good operating condition is a breach of permit condition 2.3.5 and attracts a CCS score of 3.

As discussed the following actions are required;

a) in the first instance replace the current filter with spares held onsite and monitor closely.

b) assess the adequacy of the current filter specification and if necessary replace with adequately sized filter. Expert advice may be required.

c) Improve the site maintenance checks to ensure the filter remains effective at all times. This may include regular sniff testing by staff who have not adapted to effluent odours. Such testing needs to be completed when the filter is being loaded with foul air. Filter media must be replaced at regular intervals before it becomes exhausted.

Please report your findings / proposed actions to address this issue to NRW by 20/12/13.

3. Buildings

A number of potential improvements to prevent and minimise odour from the effluent pit area and ETP building were discussed during the visit. This included fitting a roof / door the effluent pit area and replacing areas of corroded cladding on the ETP building. I welcome your commitment to address these areas and seek clarification as what work you intend to complete and associated timescales. Please can you do so by 31st January 2014.

4. Housekeeping

I was pleased to note that concreting has been completed to the rear of the effluent screen enclosure and a wall has been constructed to contain overspray from vehicle wash down. There are some yard areas that would benefit from more rigorous cleaning, particularly between the effluent screen and the balance tank - please ensure all yard areas are kept clean.

The oil drip tray in the 'pig' oil storage cabinet has been drained (issue highlighted during previous inspection).

However it was noted the pallet tray holding the scald defeather scrubber chemicals was full of rainwater. Please

remove the water and review your procedures to ensure all drip trays / bunds are regularly inspected and dewatered as required.

5. Surface Water Drainage

An inspection of the industrial estate surface water outfall to the Cefni was inspected - no evidence of 'sewage fungus' suggesting little or no contamination present.

6. Offal Plant

Please advise me of the proposed changes for the recovery of certain offal for onward consumption / use. This is likely to constitute a minor operational change that will require agreement in writing.

7. Odour Management Plan

Thank you for submitting your revised odour management plan. I will review the report and provide comment separately.

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Operator/ Permit	WW&E (Wales And West England) Limited	Date	11/12/2013

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.	
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			
B1	C3	Effluent Tank Carbon Filter - Refer to report for actions.	20/12/13

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.