Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: AP3833HZ/0185099

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	27/06/2013				Time in	10:00	Out 13:00
What parts of the permit were assessed	Various						
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op		Water Discharge
Recipient's name/position	Gareth Jones & Stuart Deane						
Officer's name	Stuart Ross				Date issued	12/07/2013	

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)	N	
	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
	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	C3	2.2.7
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	NA	
	4. Pests, birds & scavengers	NA	
	5. Deposits on road	NA	
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

Number of breaches recorded	4	**Total compliance score** (see section 5 for scoring scheme)	16

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	12-8-13
COPIED TO PUBLIC REGISTER	JB	EDRM

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 completed within 14 days of an assessment.

This Compliance Assessment Report follows a routine site inspection on 27th June 2013 and a subsequent unplanned visit on 1st July 2013 made in response to an odour complaint on the same day.

1.Blood Scrubber Maintenance & Operation

During the inspection on 27th June a strong blood odour was noted from the drain receiving the scrubber bleed down liquor. The drain surround was cracked and requires attention. However, there is no apparent reason why blood odour should be present in this drain and it may indicate that blood has entered the scrubbing liquor which would have a detrimental effect on the performance of the scrubber.

During the second inspection on 1st July 2013, more serious issues were identified. The scrubber liquor was overtopping the reservoir overflow and entering a bin. Water was escaping onto the bund floor. When the lid of the bin was lifted a blood odour was identified which may support the points made in the paragraph above. However, more concerning was that the constant overflow would effectively dilute and flush out the scrubbing liquor dosing chemicals rendering the scrubber less effective. During this time the blood pump was running pumping blood to the blood tank and placing a load on the scrubber - this could have been avoided if the situation was managed appropriately / procedures followed and the blood pumps isolated whilst the scrubber was repaired. Cymru Country Chickens Ltd was prosecuted for a similar issue in 2011.

Furthermore, records show that site staff had identified the overflowing reservoir through daily checks and an odour complaint investigation and failed to act. The cause of the overflow was attributed to a faulty solenoid serving the reservoir top up causing water to constantly enter the scrubber, an issue that engineering staff were aware of which presented another opportunity to isolate the blood pumps which was not done. The blood pumps were isolated during the inspection when this issue was identified by NRW.

To compound the situation further, the emergency back up carbon filter serving the blood tank was removed - the reason why is unclear.

The scrubber has not been maintained in good operating condition which is a breach of permit condition 2.3.5 CCS3.

The above issues are in breach of permit condition 2.3.2 (training) and condition 1.3 (overarching management / EMS). Both breaches attract a CCS score of 3.

The following ACTIONS must be completed (also apply to DAF sludge tank scrubber as appropriate);

a) Please confirm the scrubber has been repaired and is operating normally. Please do so by 15/07/13

b) Procedures for the operation, maintenance and inspection of the scrubber must be reviewed to ensure they are fit for purpose. This will be inspected in the coming weeks.

c) Staff Training - staff responsible for the inspection and maintenance of the scrubber (including odour complaint investigators) must receive training to understand how the scrubber operates, to identify/understand faults that will cause it to operate ineffectively and how to manage any such scenario to prevent any adverse environmental effects. Training records must be maintained and will be inspected in the coming weeks. Please do so by 19/07/13.

d) Communication between staff responsible for inspecting and maintaining the scrubber (and those who investigate odour complaints) must be improved to ensure faults are quickly identified and managed. Please do so by 19/07/13.

e) The source of blood odour in the scrubbing liquor drain down must be investigated and action taken to prevent a recurrence. If the cause cannot be identified the drain down liquor odour must be closely monitored. Please report your findings to Natural Resources Wales by 19/07/13.

f) The scrubber chemical dosing pumps must be periodically inspected to ensure the prescribed dose of each

chemical is achieved. No arrangements are currently in place. Maintenance procedures must be amended accordingly and will be inspected in the coming weeks. Please implement this without delay.

g) The rationale for setting the current chemical dosing volumes on both scrubbers must be provided to NRW. Please do so by 19/07/13.

h) Potential monitoring methods/techniques for assessing scrubber emissions to air should be assessed and where are an appropriate method is identified it shall be implemented to allow active periodic monitoring of emissions. This shall be done in consultation with NRW. Please provide your findings to NRW by 26/07/13.

2. Carbon Filters

Please provide details of the maintenance checks and frequencies for carbon filters fitted to the effluent balance tank and blood storage tank. Please inform me when the filters were last inspected, what the findings were, along with details of when the filters were last changed. The reason for the carbon filter serving the blood tank being removed should be reported to NRW. Please do so by 19/07/13.

3. Scald De-feather Scrubber

The scrubber was inspected all appeared to be operating normally with all measured parameters within the correct range. The maintenance schedule of the scrubber should be obtained from Parsons Engineering, particularly for medium to long term maintenance tasks. Monthly checks are currently undertaken and records kept.

4. House Keeping

Debris from the trailer wash were accumulating on the floor and walls by the effluent screen and were several inches thick in places. Some of the contaminated water was running onto unmade ground where works are underway as part of the CO2 stun project. This is not acceptable as it may generate odour and also contaminate land & groundwater. Whilst I appreciate that engineering works are underway, measures must be taken to ensure site cleanliness is maintained.

Allowing/causing emissions to land is a breach or permit condition 2.2.7 which attracts a CCS score of 3.

There were some dirty yard areas, particularly along the edges of walls, buildings and recesses etc. Some material was putrid and has not been cleaned for some time. Also small forklift skips used to store DOAs and other ABPs stored by the blood tank were dirty with some spilt offal on the ground. Skips should be kept clean with spilt offal collected. Skips should preferably be stored under cover and out of direct sunlight.

Please inform me of the measures you have taken to address these issues by 19/07/13.

5.Staff Resources

At the time of the inspection the site has started a double shift pattern effectively doubling production at the site. The first shift (A shift) consists of staff that previously operated the daily single shift. The new second shift (Back Shift) does not currently have equivalent staff allocated to inspect the operation of the environmentally critical equipment including the odour scrubbing systems as occurs during the day shift. There is no resource available for investigating odour complaints during the Back shift - a complaint passed to site on 26/06/13 was not investigated for this very reason.

Suitably trained staff must be in place to ensure scrubbers / environmentally critical equipment is inspected and to investigate odour complaints. Please inform me of the measures you are taking to address this issue by 19/07/13

6. Bird / Vermin Control

During the inspection it was noted that a large amount of birds, particularly gulls, were congregating on site and had relatively easy access the Cat 3 and feather trailers. Birds were flying in and out of the offal gantry/trailer area feeding on the ABP. Whilst netting has been placed above the trailers it is several metres above them and is not effective on its own. During the inspection it was reported that plastic chains are to be attached to netting to attempt to scare birds away from this area.

7. Odour Management Plan

Now that the scald de-feather scrubber has been installed the draft Odour Management Plan (OMP) requires review and finalisation in accordance with permit condition 2.2.6.2. Please provide me with a date by when a reviewed OMP will be submitted to Natural Resources Wales. Documents provided by NRW.

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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.	
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			
B1	C3	Refer to report	Refer to report
C1	C3	Refer to report	Refer to report
C2	C3	Refer to report	Refer to report
E2	C3	Refer to report	Refer to report

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.