



EPR Compliance Assessment Report

Report ID: BV8016ID/0188403

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

Site	Wrexham, Breakfast Cereals	Permit Ref	BV8016ID		
Operator/ Permit holder	Kellogg Company of Great Britain Ltd				
Date	24/05/2013	Time in	10:00	Out	13:00
What parts of the permit were assessed	Site visit to discuss improvements, review of incidents & monitoring data.				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
					Water Discharge
Recipient's name/position	Tina Shrubbs / Environmental Co-ordinator				
Officer's name	Aled Zachary	Date issued	10/07/2013		

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	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	A	
	3. Surface water	A	
	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	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

Number of breaches recorded

0

Total compliance score
(see section 5 for scoring scheme)

0

If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

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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.

Site visit to discuss potential environmental improvements including resource efficiency, waste minimisation and reducing energy use.

Staff present:

Karen Thomas - Plant Director.
Mike Hedge - Operations Services Manager.
Ian Hughes - Electrical Engineer.
Russell Jones - Process Electrician.
Tina Shrubbs - Environmental Co-ordinator.
Peter Talman - Safety, Health & Environment Manager.
Ian Selley - Capital Projects / Site Services.

The site is planning a 10 stage energy saving project for the upcoming 12 months in order to reduce cost of production and increase sustainability. The improvements include:

- Oven optimisation and changes in operation
- Renewable energy source on site (potentially a wind turbine)
- Heat Recovery
- Voltage Optimisation of process electrics
- Reducing / eliminating compressed air leaks and compressor invertors
- Reducing volumes of natural gas used
- Review of Rotorclones
- Low Energy Lighting

Advice was sought on how the site compares to other food and drink production sites and for further potential energy saving initiatives that could be of benefit. It is recommended the site considers the following resources:

1. Carbon Trust - Available to provide business advice on sustainability. Provide consultancy on the environmental impact of the entire business, from the supply chain to customers. Identify broader business opportunities from the move to a low carbon economy. Further info available by contacting them on: 020 7832 4802 or businessadvice@carbontrust.com

2. National Industrial Symbiosis Programme - NISP are able to provide advice on outlets for waste and by-products to be reused, reducing waste to landfill and potentially generating an income from previously unvalued materials. Further information on NISP's work and how to join is available at: <http://www.nispsnetwork.com/how-to-join>

3. WRAP - Government funded organisation that have resources available on minimising resource use and diverting wastes from landfill. WRAP can be contacted on the following web page: <http://www.wrap.org.uk/content/contact-wrap-0>

Natural Resources Wales are also available to provide planning permission pre-application advice on the potential Wind Turbine installation on site. We are available to provide comment on any habitat / biodiversity issues by emailing details of the installation to planning@naturalresourceswales.gov.uk

Review of Red Dust Emission Incident.

An incident involving the emission of red fruit dust to the tank roof floor on the 25/02/13 was reviewed. It was found that wet scrubber plant in room 2 had failed leading to the discharge. Due to lack of cleaning and maintenance bridging of material had occurred in this item of equipment. As a result of this incident twice monthly maintenance checks have been introduced with a further daily visual inspection of the equipment. This item of plant has been highlighted for replacement and is due for upgrade in the next 6 months.

Effluent Treatment Plant:

A short visit to the effluent treatment plant on site was conducted during the visit. The new balancing tanks are currently being commissioned with new venture aerators installed to reduce plant wear; otherwise the plant is operating as normal. No excessive odour was noted around the plant at the time of the visit.

Reporting of Emissions to surface water and sewer: Q4 2012 & Q1 2013.

Requirements - Conditions 2.10.1 & 2.10.2 require the operator to maintain an emissions monitoring programme to the frequency detailed in table 2.10.1. The results of this monitoring shall be submitted for review as detailed in condition 4.1.2 and Schedule 2 of the permit.

Findings - Monitoring of emissions to surface water and sewer have been received for the period 1st January 2013 - 30th March 2013 & 1st April 2013 - 30th June 2013. Monitoring results show all emissions to be compliant with the permit limits.

Actions – None.



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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.

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.

