

	EPR Compliance Assessment Report	Report ID: YP3632EM/0241484			
This form will report compliance with your permit as determined by an NRW officer					
Site	Sandycroft Poultry Processing		Permit Ref	YP3632EM	
Operator/ Permit holder	2 Sisters Poultry Limited				
Date	11/06/2015 and 12/06/2015		Time in	09:42	Out 11:05
What parts of the permit were assessed	Odour Control				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	Steve Van Der Keift				
Officer's name	Matthew Kelk		Date issued	18/06/2015	

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)	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	1.3.1
	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	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	C3	2.2.6
	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	4	Total compliance score (see section 5 for scoring scheme)	16
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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.

On the 10 June 2015 and 11 June 2015 3 odour complaints were forwarded to Natural Resources Wales (NRW) and 1 directly to site.

Natural Resources Wales visited the site on the evening of 11 June 2015 and the morning of 12 June 2015. On the evening of 11 June 2015 an offsite odour was substantiated by an NRW officer.

As a consequence of these visits the following breaches of permit YP3632EM were identified.

1.Odour Emissions

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 hat those described in the Application where relevant.

Finding

On the 11 June 2015 the millivolt (MV) reading on the pump for main chemical scrubber on site was found to be reading 75MV, optimum level for operation should be 750MV +/- 50MV. Following further investigation it was ascertained that the sodium hypochlorite level in the IBC connected to the scrubber was less than 50l in volume. Due to low levels of hypo being fed to the scrubber plant, the unit failed and led to the offsite odour witnessed on the day.

Compliance/Action

The above breach attracts one category three CCS score.

2 Sisters Group (Sandycroft) have investigated the cause of the failure but have not managed to tie the failure down to one particular cause. NRW request that site investigate the cause to the scrubber failure further by carrying out a detailed investigation with the assistance of Parsons Engineering. Site to report findings to NRW by 18 July 2015.

Following discussions with the site regulatory officer, 2 Sisters have requested that Parsons Engineering fit an alarm that will sound when the pump MV reading falls outside optimum parameters. NRW request that an action plan for the installation of this alarm is forwarded by 18 July 2015.

Advice and guidance

Site allow the level of sodium hypochlorite to drop below 50 litre level, NRW advise that if site are to do this that scrubber checks are increased to ensure optimum operation of the abatement system.

2. Staff Training

Condition 2.3.2:-

The Permitted installation shall be supervised by staff who are suitably trained and fully conversant with the requirements of the permit.

Finding

Following discussions with site environment manager it has been established that at night, shift supervisors from within the factory are carrying out odour investigations. The shift managers are desensitised to the odour that the installation will produce and as such are not suitable to carry out odour investigations. In addition to this they do not have sufficient knowledge to investigate malfunctioning abatement systems on site.

Compliance/Action

The above breach attracts one category three CCS score.

Site is instigating new procedures to only allow primarily office based staff with sufficient technical knowledge to investigate odour incidents by end of June 2015.

3. Blood Scrubber Maintenance

Condition 2.3.5:-

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

Finding

During visit of 11 June 2015 the site glass on the blood scrubber appeared empty and the attending NRW officer had to turn a valve for the site glass to fill with water. Water appeared to be leaking from the scrubber both on 11 and 12 June 2015.

Action/Compliance

The above breach attracts one category three CCS score.

Please ensure that the scrubber is maintained to ensure adequate function of this equipment. Records of maintenance and correct functioning of the equipment will be audited during the next inspection.

4. Feather Flume Discharge

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 and conditions of this Permit.

Finding

During visit of 11 June 2015 evidence of effluent being discharged from the feather flume return tank directly to the yard before running into drainage for the onsite Effluent Treatment Plant, contrary to 2 Sisters operating procedures. This is bad practice as discharging this way has potential for odour emissions leaving site.

Action/Compliance

The above breach attracts one category three CCS score.

Retrain staff in the procedure for this effluent discharge, records to be maintained for next audit.

Advice and Guidance

11 June 2015 NRW officer saw evidence of effluent being discharged from gantry onto yard, when a full ABP trailer was removed from underneath, this has potential for fugitive odour emissions. Please review procedure for ABP trailer removal by 18 July 2015.

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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			
B1	C3	See text for details	18/07/2015
C1	C3	See text for details	30/06/2015
C2	C3	See text for details	18/07/2015
F1	C3	see text for details	18/07/2015

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.