

	EPR Compliance Assessment Report	Report ID: YP3632EM/0249981			
This form will report compliance with your permit as determined by an NRW officer					
Site	Sandycroft Poultry EPR/YP3632EM		Permit Ref	YP3632EM	
Operator/ Permit holder	2 Sisters Poultry Limited				
Date	28/09/2015	Time in	10:00	Out	15:00
What parts of the permit were assessed	Odour Control				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
					Water Discharge
Recipient's name/position	Steve Van Der Keift (SDVK)				
Officer's name	Matthew Kelk		Date issued	16/10/2015	

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	A			
	2. Closure & decommissioning	N			
	3. Site drainage engineering (clean & foul)	N			
	4. Containment of stored materials	N			
	5. Plant and equipment	A			
c) General management	1. Staff competency/ training	A			
	2. Management system & operating procedures	A			
	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	A			
	2. Noise	A			
	3. Dust/fibres/particulates	A			
	4. Pests, birds & scavengers	A			
	5. Deposits on road	N			
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	C4			2.4.1.2, 2.8.1, 4.1.7, 4.1.2
	2. Records of activity, site diary, journal & events	A			
	3. Maintenance records	A			
	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)	0.1
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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.

An inspection was carried out on the 28 September 2015 mainly concentrating on odour control and associated procedures.

Scald Scrubber

Discussions were held around the odour incidents on 11/12 July 2015. Parsons Engineering carried out a full investigation, it was established that the scald scrubber pump was functioning correctly during the incident and so it was decided to fit a full fail safe system. An alarm has been fitted which sounds if the fans on the scrubber stop working and/or the feed from the hypo/caustic stops.

Action

Please send full report by Parson Engineering.

2 Sisters procedure for operation of the scald scrubber has been updated to include monitoring of the caustic/hypo levels, although this was already carried out on the scrubber operational checklist. The correct level of the above chemicals should be within the procedure and the procedure updated accordingly.

SDVK suggested that they would start marking the IBC's of caustic/hypo with the minimum running level indication.

Action

Updated scald scrubber procedure to be forwarded to NRW by 16 November 2015

Offal Gantry Procedure

Procedures for the collection of CAT2/3 waste were discussed during the inspection. Amber Foods arrange for the trailers to pick up offal from site. Amber Foods has asked site whether collection of CAT2/3 waste can be reduced to every other day and the site have disagreed with this approach. NRW consider that reducing the removal frequency of offal waste to every other day could lead to increased odour particularly in the summer months and should be avoided

It was suggested during the meeting that it would be prudent to include the following in the procedure:-

- Frequency of offal trailer collection,
- All trailers should be covered,
- Checks should be made to sure that the effluent pipes from offal trailers are correctly fitted and are placed securely in the drains.

Action

Updated offal gantry procedure to be forwarded to NRW by 16 November 2015

New Odour Monitoring Programme and Complaint Checklist

2 Sisters have started to carry out an odour check 2-3 times a week, making an assessment at various points on the roads surrounding the factory. It would be prudent to keep records of this odour monitoring.

Discussions were held around the odour checklist that is forwarded to NRW following a complaint, it was mentioned that it would be beneficial to add the pH, millivolt readings and hypo/caustic levels from the scald scrubber to the odour checklist. Site were asked who now carries out odour check s following receipt of a complaint out of daytime hours. This is carried out

by the night manager as they have a detailed knowledge of the site. Engineering always have a presence on site and will check the chemical scrubbers are working if a complaint is received.

Action

Updated complaint checklist to be forwarded to NRW by 16 November 2015

Blood/sludge scrubber

The blood/sludge scrubber on site has now been fitted with hypo/caustic dosing, procedures for the new dosing unit were provided during the inspection. As the scrubber has only been recently fitted, 2 Sisters are measuring the amount of scrubbing chemicals that are used over a 2 day period and will update the procedure to include minimum levels of caustic/hypo that are acceptable.

Action

Updated blood/sludge scrubber procedure to be forwarded to NRW by 16 November 2015

Blood/Sludge Offload Procedure

Both the blood collection and sludge procedures were audited during the inspection to ensure they were fit for purpose for the control of odour, both appeared fit for purpose.

An audit of the documentation for Animal By Products (ABP) wastes leaving the sites was carried out, extensive documentation was provided for the feather and blood movements off site.

Waste transfer notes were provided for the effluent sludge waste leaving site.

Site walkover

Whilst on the site walk over the following issues were found which require/required your attention as outlined below:-

Effluent Screen

A new housing has been constructed around the effluent fines screen waste collection point, this has been constructed to mitigate any odour from this area. During the inspection the door on the waste collection point had been left open, effectively rendering this odour control ineffective.

Action

SDVK to ensure that the procedure for the effluent screen housing is followed by key staff members.

Feather Flume Tank

The feather flume tank has been removed and the resulting void has been covered over with sheet steel. During the inspection there were several holes in the sheet steel and a slight odour detected in this area. Site immediately remedied the problem and has confirmed by email. This will be updated during the next inspection.

Feather Press Effluent Down Pipe

Effluent from the feather press is directed via a flexible hose to a drain located behind the ABP collection lorries. There was evidence that the pipe had become dislodged and had been run over by reversing vehicles and was leaking effluent behind the ABP lorries before running down the drain to the Effluent Treatment Plant.

During the inspection it was recommended that the pipe be plumbed in directly to the drains rather than using flexible piping. This has been carried out as confirmed by email. This will be updated during the next inspection.

Pump Adjacent to Offal Gantry (Gal bladder extraction)

A loud whining noise was evident from above pump, which could lead to noise complaints.

Action

- Site to investigate cause of whining noise and to report findings back to NRW by 16 November 2015

Scald Scrubber Alarm

Discussions were held around the testing of the new alarm on the scald scrubber, at present this is only tested once a month. It was agreed that this needed increasing to at least weekly, this was adjusted on the maintenance system on site and the alarm was tested.

Monitoring returns

The following annual reports appear not to have been submitted:-

Recent

Condition 2.4.1.2 Water efficiency audit May 2015,

Historic

Condition 2.8.1- Accident Management Plan Feb 2013

Condition 4.1.7. – Site Protection Monitoring Programme Feb 2013

Condition 4.1.2 Historical data from form S2, PI1 and WU1 June 2013.

The above breach attracts one category 4 score. Site to forward returns/reports to NRW by 16 November 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			
G1	C4	Submit annual reports/monitoring returns	16/11/2015

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.