

Compliance Assessment Report

Report ID:
CAR_NRW0025270

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					
Regime	Installations					
Date of assessment	21/07/2016	Time in	10:00	Out	15:00	
Assessment type	Site Inspection					
Parts of the permit assessed	All					
Lead officer's name	Kelk, Matthew					
Accompanied by						
Recipient's name/position	Steve Van Der Keift/ OHSE Manager	Date issued	13/10/2016			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). 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	CCS Category	Condition(s) breached
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	C3	2.3.5
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
E1 - Emissions - Air	C3	2.2.4.1
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	2	Total compliance score (see section 5 for scoring scheme)	8
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If the Number of breaches recorded is greater than zero, please see Section 3 for 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 (eg. 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 advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

An inspection was carried out by Industry Regulation Officer Matthew Kelk on 21 July 2016.

The following issues was discussed as outlined below:-

Trial Anaerobic Digestion (AD) Plant

H2 Energy Ltd, the company carrying out the AD trial have gone into administration as such the trial has ceased. The trial plant is to be removed from site.

Action

Site to send decommissioning plan to NRW by 2 October 2016.

Scald Scrubber

Procedure for operation was reviewed, no issues. Site have had no problems with scrubber system. Alarm has been fitted to warn of low millivolt readings and alarm is tested on a weekly basis. Dipsticks are being used to test the levels of caustic and sodium hypochlorite.

Offal Gantry

Adjustments have been made to plumbing on the gantry. Procedure for offal gantry reviewed, no issues.

Condition 2.3.5

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

During the site walkover, there was evidence of effluent leaking out the back of the feather press pump and onto the yard below. Effluent potentially odorous. Site are to install a new pump imminently. Site to inform NRW when pump has been fitted.

Category 3 score for this permit breach.

Spillage Training

It was previously identified that key operational staff were due refresher training for spillages. A member of training staff was made available during the inspection and produced records that the training was on-going.

Feather Flume Tank

Feather flume tank has been removed that was previously identified as having potential to cause odour. All openings sealed off. This area was inspected during the site walkover.

Gal Bladder Extraction Pump

The gal bladder pump next to the offal gantry is still making an audible high pitched squealing noise. Although the noise is not evident beyond the site boundary, it would be prudent to investigate the cause of this noise.

Blood and Sludge Scrubber

Blood and sludge scrubber procedures were reviewed during the inspection and have been adjusted to include minimum levels on the sodium hypochlorite and caustic containers.

Blood and Sludge Collection Procedures

Detailed procedures exist separately both for blood and sludge collection. These were produced during the inspection. Engineering supervise the collection of both blood and sludge. Checklists are available for the collection of blood.

Recommendation

It was recommended during the inspection that it would be useful to include a checklist for the collection of sludge. This has since been sent to NRW (26 July 2016).

Drainage Survey

A CCTV survey of the drainage system on site has not been carried out since 2007. As previously mentioned after the drainage audit in November 2015 it would be prudent to undertake a CCTV survey of the subsurface drainage system. Following completion, the results and associated action plan should be forwarded to NRW.

Refrigeration Plant

On the 22 March 2016 a Schedule 1 - Notification of Abnormal Emissions was received from site. Site reported that a significant quantity of R407f refrigerant gas had been released to atmosphere over a period of time. This was detected during a bi-annual manual leak check.

Further information was received from site via email 8 April 2016 that approximately 200kg of gas had been released.

Fugitive Emissions of Substances to Air

Condition 2.2.4 - The Operator shall use BAT so as to prevent or where that is not practicable to reduce fugitive emissions of substances to air from the Permitted Installation in particular from

- *Storage areas,*
- *Buildings,*
- *Pipes, valves and other transfer systems,*
- *Open surfaces*

Further Part B received for incident. System back pressure valve was found to be leaking. System isolated and pipe and valve replaced. Position of leak detection devices reviewed and calibrated.

Category 3 score for this permit breach.

Root cause and remedial action adequate, no further action to be taken.

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EPR Compliance Assessment Report

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Operator/Permit holder	2 Sisters Poultry Limited	Date	21/07/2016

Section 3 – Enforcement Response

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.

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.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
B5	C3	Inform NRW of installation of new pump.	02/10/2016
E1	C3	Remedial action already carried out by site	02/09/2016

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 verbally or 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 that 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 fulfil 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 (eg. 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
- Assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental 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 reports 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 officer's line managers using the informal appeals procedure. 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.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.