Cyfoeth Naturiol Cymru / Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: YP3632EM/0254220

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	26/11/2015			Time in	10:00	Out	14:00
What parts of the permit were assessed	Drainage Audit						
Assessment	Site Inspection	EPR Activity:	Installation X	Waste Op		Water Discharge	
Recipient's name/position	Steve Van Der Keift						
Officer's name	Matthew Kelk			Date issued	22/12/2015		

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)	A		
	4. Containment of stored materials	A		
	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	A		
e) Emissions	1. Air	N		
	2. Land & Groundwater	N		
	3. Surface water	A		
	4. Sewer	N		
	5. Waste	N		
f) Amenity	1. Odour	N		
	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	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	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

MK 21.01.2016

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.

A drainage audit was undertaken at 2 Sisters Sandycroft by Natural Resources Wales on the 26 November 2015.

The following issues were discussed:-

1. The main risks to surface water have been identified by 2 Sisters, in particular in their accident management plan. Discussions were held about each risk and how they are managed as outlined below:-

a) Hygiene Chemicals

Hygiene chemicals during use by hygiene staff are kept in small pre metered 5 litre containers. Chemicals are kept in a fully bunded area. Any spillages not cleared by spillage kits would be captured by the effluent treatment plant (ETP).

For storage of bulk hygiene chemicals these are kept in 25 litre containers and are stored in the part of plant that only drains to ETP.

Decanting and transport chemicals occurs in the captive area that leads to the ETP, spill kits are available and all transport are trained to transport chemicals in a safe manner.

b) Oils

Waste oils are kept in small containers and are then kept in bunded area in locked containers. Spill kits are available to clear up any spillages. Dispatch and engineering are trained in spillage procedures.

Site mentioned that operatives are due refresher training for spillage procedures.
SDVK to introduce mocked up scenario based spillage training on site for engineering staff.

Action

To update refresher trainer with regards to spillages.

Tanker charging for oils is carried out by a contractor, all oil deliveries are supervised by engineering. During delivery spillage mats are put over all drainage points in close proximity. 110% bund on oil storage tanks, all tanks are double skinned. Tanks are also fitted with overfill alarms.

Any chemicals used within the boiler plant are kept in bunded area and is in area.

c) ETP and Water Treatment Chemical Storage

All chemicals for the ETP plant are kept indoors where the ETP is located, any spillage of these chemicals would drain straight to ETP and could be managed.

Site are now trialling using solid chemical blocks rather using liquid treatment chemicals.

d) Blood tank

Blood tank – is fitted with high level alarms which are tested on a regular, spill kits are available close to the blood tank, it is likely that the blood would congeal before reaching surface water drains.

Maintenance records shown for recent testing of the high level alarms.

e) Diesel/Lorry Wash

All red diesel is kept in double skinned tanks – spill kits are available at key fill points.
White diesel tanks in the lorry park are surrounded by petrol interceptors which would collect any spillage during filling.

Front end of lorries are washed in this area, this drained into drains that lead to the ETP.

f) Effluent/Sludge

1 metre retaining wall around ETP plant area, which will protect effluent balance and sludge tank. These tanks will drain to ETP if spillages occur. High level alarms are fitted to the balance tank and warning lights are installed on the sludge tank.

Sludge tank offload is overseen by ETP operative during offload to tanker lorry before transport off site.

Site were asked what happens in the event of a fire on site and what happens with firewater. Procedure is to fit mats to the surface water drainage points and to direct firewater to the drains that are directed to the ETP.

Drainage plans are kept at strategic locations around the site, a 'battle box' containing the drainage plans is kept in the security hut.

CCTV survey has been undertaken on drainage system but this was back in 2007, whilst visual checks of visible parts of the drainage are carried out, this is the only maintenance of the underground drainage system that has been carried out.

Advice and Guidance

It would be prudent to increase the frequency of maintenance checks on the subsurface drainage system. It is recommended that a CCTV camera survey is undertaken in 2016 of the drainage system and pending the results of this, an action plan compiled and forwarded to NRW.

g) Surface Water Samples

A spot water sample from the surface water drainage system was taken at locations SW1 and SW2 (see drainage layout in permit application). The samples were tested for ammonia using an indicative field kit and found to be compliant.

2. Monitoring Reports/Accident Management Plan/Water Efficiency Audit

Historical monitoring returns submitted for 2013, forms PI1, S2 and WU1 - data reviewed, no issues identified.

A comprehensive water efficiency has been undertaken by 2 Sisters Sandycroft - it can be seen that site are well within specified water target per bird for BAT.

Detailed accident management plan submitted by site outlining all key risks to environment and how risks are managed.

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Operator/ Permit	2 Sisters Poultry Limited	Date	26/11/2015

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.