



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

Site	SANDYCROFT POULTRY PROCESSING			Permit Ref	YP3632EM		
Operator/ Permit holder	WW&E (Wales And West England) Limited						
Date	28/08/2014			Time in	10:00	Out	12:30
What parts of the permit were assessed	Inspection						
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge	
Recipient's name/position	Steven Van Der Keift						
Officer's name	Matthew Kelk, Stuart Ross			Date issued		11/09/2014	

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)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	C3	2.3.5
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	C3	1.3.1.
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	C3	2.5.1
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	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

3

Total compliance score
(see section 5 for scoring scheme)

12

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.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

This report covers the compliance inspection carried out on 28th August 2014 by Natural Resources Wales (NRW) Officers Matthew Kelk and Stuart Ross.

Permit Compliance

The following breaches of the site environmental permit (YP3632EM) are outlined below:-

Permit Requirement

Condition 2.5.1:- The operator shall design, maintain and operate all facilities for the storage and handling of waste on the permitted installation such that there are no releases to water or land during normal operation and that emissions to air and the risk of accidental release to water or land are minimised.

Condition 1.3.1:- 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.

Management Procedures

Finding

During a routine investigation following an odour complaint to site on the 04/08/2014, it was established that the Animal By Products (ABP) Cat 2 trailer had not been emptied for over 3 days. Best available technique to reduce odour from this source is to empty ABP trailers daily.

Compliance/Action

Both permit breaches attract a CCS category 3 score. It was agreed during the inspection that EMS procedures would be updated to ensure that that ABP trailers are emptied on a least a daily basis.

Permit Requirement

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.

Maintenance

Finding

During the inspection a malfunctioning part of the offal screen located on the gantry above the ABP trailers was spilling offal onto the gantry. Detritus was evident on the gantry floor and surrounding area, some of which appeared to have been present for some time.

Compliance/Action

Permit breach attracts a CCS category 3 score. Updated procedures to be put into place to keep ABP screen area functioning correctly and to ensure adequate clean down to prevent and minimise odour emissions.

Advice and Guidance

1. The scrubber system for the blood tank, sludge tank and balance tank at present is only running through a water reservoir and is not chemically dosed. NRW consider that BAT for this abatement is to chemically dose the system to bring it in line with similar scrubbers on site and at 2 Sisters Llangefni. We are aware that site has already costed the project; timescales for installation shall be forwarded to NRW by 10/10/2014.
2. It has been established during past odour assessments by site and by NRW during the most recent inspection that the feather press tank is a source of odour on site. Discussions were held regarding extracting this part of the process to the scrubber system. Timescales for installation to be forwarded to NRW by 10/10/2014.
3. Effluent treatment plant screen is currently located outside, discussions were held regarding covering this area to bring in line with current BAT to avoid odour release. Timescales for installation to be forwarded to NRW by 10/10/2014.



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Site	SANDYCROFT POULTRY PROCESSING	Permit	AP3633HT
Operator/ Permit	WW&E (Wales And West England) Limited	Date	28/08/2014

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.

X

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			
B5	C3	See report for details	10/10/2014
C2	C3	See report for details.	10/10/2014
C4	C3	See report for details.	10/10/2014

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.

