Compliance Assessment Report

Report ID: CAR_NRW0032065

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	26/07/2017	Time in	10:00	Out	16:00
Assessment type	Site Inspection				
Parts of the permit assessed	All				
Lead officer's name	Kelk, Matthew				
Accompanied by	McClymont, James				
Recipient's name/position	Steve Van Der Keift/ OHSE Manager	Date issued	01/09/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. 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	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	C3	2.2.5.1
C2 - General Management - Management system and operating procedures	C3	1.3.1
E1 - Emissions - Air	C3	2.3.5
E3 - Emissions - Surface water	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	A	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	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	**3**	**Total compliance score** (see section 5 for scoring scheme)	12

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 of the plant was carried out on 26 July 2017 by Industry Regulatory Officers Matthew Kelk and James McClymont.

The following issues were discussed during the inspection:-

1. Boiler Plant

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.

An update was given on the boiler plant on site.

21.06.2017 incident Boiler no.2, causing black smoke whilst boiler no.1 under service. No. 2 inspected on 24.6.2017, burner checked and decommissioned during service.

19.07.2017 further incident of black smoke from boiler no.2. Serviced again on this occasion.

Engineering are carrying out constant checks to ensure that boiler does not cause issue again.

Breach of condition 2.3.5 for emissions of black smoke. Scored 1 category 3 score.

No further action.

2. Incident Notification

During the inspection the incident notification procedure was reviewed and appeared fit for purpose. It was noticed that the contact number for NRW was wrong. For site information, Environmental incidents can be reported to 03000 65 3000. This is a 24 hour service.

3. Standard Operating Procedure (SOP) Sludge/Blood/Offal Collection

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.

Procedure reviewed for collection of sludge, blood and offal. Odour from offal storage was discussed, lorries coming into site for the collection of offal are empty to ensure no odour.

SOP for blood and sludge requires checklist to be filled in to ensure that procedure is being followed. It was evident during the inspection that a good number of these checklists has not been filled in by site operative.

Breach of condition 1.3.1 for inadequate records not being filled in as part of SOP. Scored 1 category 3 score for this breach.

Action

Retrain operatives to ensure that operatives fully follow SOP and fill in checklists as required. Forward logs of retarining to NRW by 29 September 2017.

4. Drainage

A drainage survey was last carried out in 2007, as previously discussed it would be prudent to carry out a CCTV survey as a preventative measure.

5. Feather Press Pump

An update was given on the feather pump that was seen to be leaking during the last inspection carried out on site, this has been fully replaced and it was evident during the site walkover that this has stopped the leak.

6. Spillage Procedure

SOP was reviewed during the inspection, no issues were identified.

7. Waste

Site talked through how the waste hierarchy is applied to different wastes on site. An audit of several waste transfer certificates was carried out. No issues were identified.

8. Containment

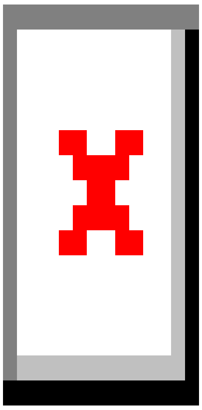
Condition 2.2.5.1

Subject to condition 2.2.5.2 below, the Operator shall use BAT so as to prevent or where that is not practicable to reduce fugitive emissions of substances to water (other than Groundwater) and sewer from the Permitted Installation in particular from:-

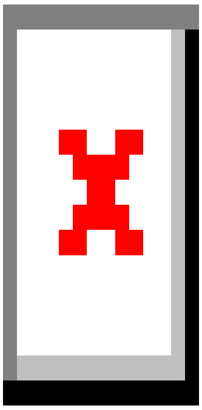
- *all structures under or over ground*
- *surfacing*
- *bunding*
- *storage areas*

provided always that the techniques used by the Operator shall be no less effective than those described in the Application, where relevant.

During the site walkover, a crack was identified in the bund around the effluent balance tank. This will render the containment ineffective. See picture below.



Pipes were identified coming through bund causing weakness in the structure. (See picture below)



Breach of condition 2.2.5.1 - inadequate secondary containment. Scored 1 category 3 score.

Action One

Repair existing bunds and inform NRW upon completion of works by 29 September 2017.

Action Two

Site to review bunding arrangements in line with guidance note CIRIA C736 - Containment Systems for the Prevention of Pollution, Secondary, Tertiary and Other Measures for Industrial and Commercial Premises. Site to compile a report to include assessment against this guidance and an action plan to include timescales to bring containment to necessary standard. Assessment to be carried out and report and any actions to be forwarded to NRW by 30 November 2017.

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Operator/Permit holder	2 Sisters Poultry Limited	Date	26/07/2017

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			
C2	C3	See text for details	29/09/2017
E1	C3	No further action required	31/08/2017
B4	C3	See text for details	30/11/2017

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 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 fifteen 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.