

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

Site	SANDYCROFT POULTRY PROCESSING	Permit Ref	AP3633HT		
Operator/ Permit holder	WW&E (Wales And West England) Limited				
Date	25/10/2013	Time in	00:00	Out	00:00
What parts of the permit were assessed	Odour Control				
Assessment	Site Inspection	EPR Activity:	Installation: X	Waste Op:	Water Discharge:
Recipient's name/position	Steven van der Keift				
Officer's name	Stuart Ross	Date issued	04/11/2013		

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

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	N
c) General management	
1. Staff competency/ training	N
2. Management system & operating procedures	N
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	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	0	Total compliance score (see section 5 for scoring scheme)	0
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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

INITIALS	DATE
OK FOR PUBLIC REGISTER	02/12/13
COPIED TO PUBLIC REGISTER	EDRM

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.

This Compliance Assessment Report covers site inspections completed on 25/10/13 and 28/10/13 to assess progress with the installation of the scald de-feather odour scrubber.

W&WE (Wales & West England) Ltd set a deadline for scrubber installation of 26/10/13. (This follows previous legal dead lines set by the Environment Agency and Natural Resources Wales which were not met).

1. Scald De-feather Scrubber Installation

On 25/10/13 it was observed that the packed column scrubber was installed on its concrete plinth as was the scrubber vent stack. The majority of connecting ductwork was installed with some short sections waiting for completion including the connection to the scald de-feather room roof vents - this was reportedly scheduled for completion on 26/10/13 during a period of non production.

During my second inspection on 28/10/13 the scrubber was fully operational (all duct work complete, scrubber ID fan, recirculation pump and dosing system operational). Air from the scald de feather room was being collected from the pre-existing roof vents and treated in the chemical scrubbing tower before release via the exit stack. Sodium hydroxide and sodium hypochlorite IBCs were placed on bund pallets to supply the automated dosing system.

pH and redox potential is continuously monitored and at the time of the inspection both parameters were within the pre-determined set points.

During the inspection no scald odour was noticed on site, with only localised relatively minor odours noted from the lairage area and ABP gantry.

A brief off site odour assessment was made with the site environment and engineering manager. A moderate breeze was blowing across the site towards Glendale Avenue, a walk up and down the road identified no scald de-feather odour and very little odour at all.

Since the scrubber became operational on 26/10/13, Natural Resources Wales has received no odour complaints from local residents which appears to represent / reflect a significant step change in site odour control.

2. Scrubber Operating Procedures

As discussed on 28/10/13, please ensure appropriate operating procedures are put in place to ensure the scrubber is effectively operated, monitored and maintained. Procedures were developed at your Llangefni site which may be suitable for implementation at Sandycroft. Please ensure staff are suitably trained.

Procedures & records will be reviewed during the next inspection.

It was reported that the scrubber will be fitted with an alarm to highlight a scrubber fault - please ensure the alarm will be detected site personnel to allow the fault to be quickly rectified and prevent / minimise any potential environmental impact.

Please note – Whilst the scald de-feather scrubber has now been installed, Natural Resources Wales is currently considering its enforcement position with regards to the failure of W&WE (Wales & West England) Ltd to install the scrubber in accordance with timescales previously set by a permit improvement condition and enforcement notice.



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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			

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.