

Compliance Assessment Report

Report ID:
CAR_NRW0033745

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	03/08/2018	Time in	09:46	Out	10:46
Assessment type	Site Inspection				
Parts of the permit assessed	Odour				
Lead officer's name	Kelk, Matthew				
Accompanied by					
Recipient's name/position	Steve Van Der Keift/ UKP H&S Divisional Lead Birmingham & West	Date issued	07/08/2018		

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	
B5 - Infrastructure - Plant and equipment	A	
F1 - Amenity - Odour	C3	2.2.6.3

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	1	Total compliance score (see section 5 for scoring scheme)	4
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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

Following a number of odour complaints over recent weeks a inspection of the site was carried out on the 3 August 2018.

This CAR form also details visit to site on the 1 June 2018.

The following issues were discussed on site:-

1. Blood Scrubber 03/08/2018

It was established that whilst on site the redox reading and pH on the blood scrubber was out of specification. The maintenance of the scrubbers on site is contracted out to Parsons UK. 2 Sisters have been advised by Parsons that due to the extremely hot weather recently that the scrubber may have become overloaded due to increased bacterial action and may need upgrading.

It was discussed on site between NRW and 2 Sisters that site will obtain a full technical description from Parsons as to why the scrubber is running out of specification.

Post inspection on the 6 August 2018 an email has been forwarded from 2 Sisters to NRW explaining the situation and that in essence a new larger scrubber sump is required to allow for a greater residence time within the scrubber allowing for greater stability of the system.

Action

2 Sisters to send action plan for installation of larger scrubber sump for the blood/sludge scrubber by 6 September 2018

Note that due to the proactive nature been undertaken by 2 Sisters, that the issue has not been scored as a breach of permit on this occasion.

2. Blood Scrubber 01/06/2018

Condition 2.2.6.3

Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

On the 1 June 2018 a site visit was undertaken due to odours witnessed offsite on Rectors Lane. During the site visit it was established that the blood scrubber had been off for a number of days due to a maintenance issue. This may have caused the offsite odour witnessed by the NRW officer on the day. I met with Murray Johnston on site on this occasion.

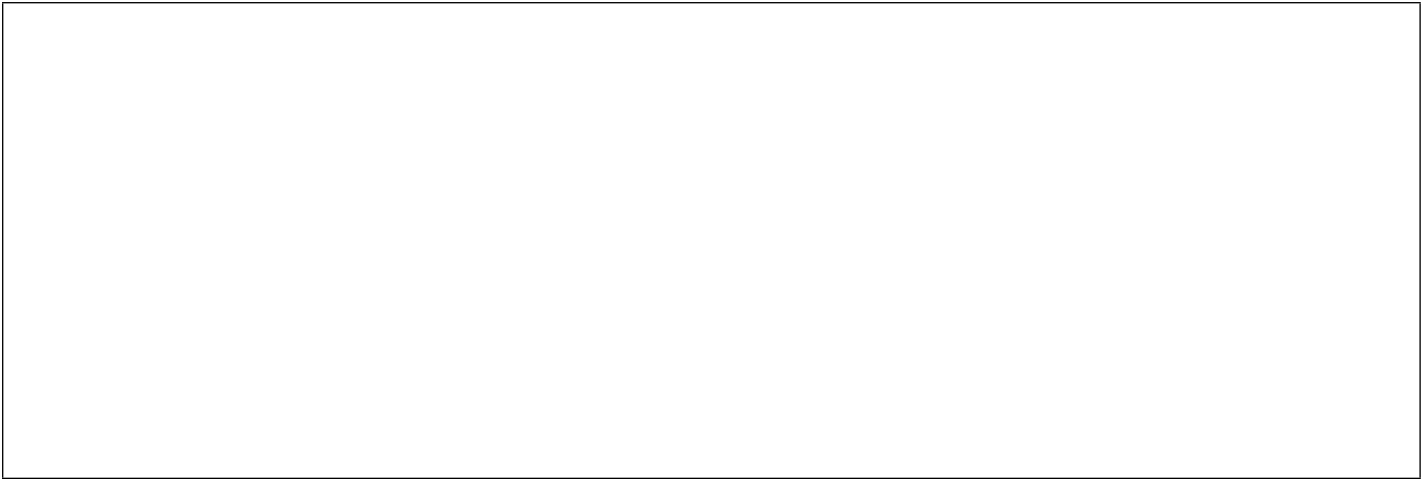
Post inspection a detailed response was received from Steve Van Der Keift, that Parson UK had been called a number of times and had not met their contract with 2 Sisters for maintenance of the scrubber system.

Whilst NRW understand the situation, this is a contractual issue between 2 Sisters Food Group and Parsons UK.

Breach of permit non-operation of the blood scrubber system, scored one category 3 score

Action

Please note that if an environmentally critical piece of kit is malfunctioning for a number of days that NRW should be informed of the situation under the notification procedures specified within your environmental permit.



EPR Compliance Assessment Report

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Operator/Permit holder	2 Sisters Poultry Limited	Date	03/08/2018

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.

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.

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			
F1	C3	See text for details	06/08/2018

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.