



EPR Compliance Assessment Report

Report ID: BV8024IW/0194747

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

Site	Llangefni Dairy	Permit Ref	BV8024IW		
Operator/ Permit holder	Glanbia Cheese Ltd				
Date	20/11/2013	Time in	10:30	Out	15:30
What parts of the permit were assessed	1.3.1, 1.4.1, 2.3.5, 2.3.6, 2.3.7.2, 2.8				
Assessment	Audit	EPR Activity:	Installation	X	Waste Op
					Water Discharge
Recipient's name/position	Baron Walkden, HSE Manager				
Officer's name	Beth Voice	Date issued	20/01/2014		

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	NA	
	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	C3	2.2.7.2
	3. Surface water	A	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	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	C4	1.3
	3. Maintenance records	A	
	4. Reporting & notification	A	
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

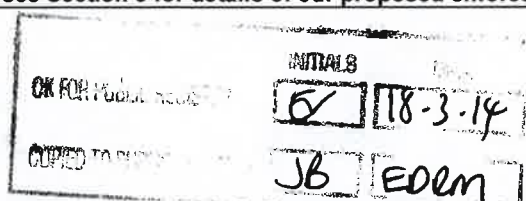
Number of breaches recorded

2

Total compliance score
(see section 5 for scoring scheme)

4.1

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.

Sewers

The incident on the 22/07/13 was discussed in which warm water was found in the ground adjacent to a cracked underground DCWW line. It was initially thought this had come from a collapsed Glanbia drain under the railway line; however it has since been found that this was not the case but that there was a Glanbia line blockage. This has been cleared, and if further degradation is found then repairs will be carried out.

The warm water came from the overflow of two tanks which contained condensate. The whey department were filling these tanks in preparation of carrying out a deep clean on the evaporator. The tanks are no longer used so this overflow is no longer an issue.

A CCTV drain survey is carried out annually on all site drains except for those within buildings which are of stainless steel construction. Any issues are either fixed immediately, or placed on CAPEX if more expensive repairs are required. Site drains are of plastic, clay or stainless steel construction. All clay pipes are to be replaced with steel within 2 years.

Maintenance

Met with the site Maintenance Manager. SAP is used for maintenance tasks, and these are tracked on a spreadsheet with outstanding work highlighted. The Maintenance Manager has very good control over tracking tasks and recording trends in performance of equipment, processes and teams.

The 'morning meeting' is attended by Team Leaders and Departmental Heads to produce a daily work plan. Work is allocated to the different teams, and task completion is tracked to see which teams are more productive than others. If any issues are found on the plant, the operators can either inform their team leader or the Maintenance Manager. The teams have daily check sheets which are reviewed and added to the task list as appropriate.

A weekly meeting is used to review KPI's which includes investigating trends and common problems.

Engineering Procedures: ENG100 maintenance policy and strategy, ENG200 contractor management, ENG300 management of change, ENG400 calibration.

Tank Inspection

Tanks are inspected annually using a dye testing method. These are not on SAP as they are on a maintenance service contract. Contractors were on site on the date of inspection.

Critical Instruments

Critical instruments are listed. Tank high level alarms are calibrated by an external company. Dates of inspections and outstanding work are tracked. Calibration records for the ETP are kept with the critical instrument records (certificates that have been inspected /repaired) and these were all up to date.

Oil Interceptor

An external company services the oil interceptor every 6 months. The interceptor was serviced on 18/03/13 (no filter removal) and 27/08/13 (the old filter was removed and the hazardous waste note was produced).

Environmental Checklist

The Environmental Manager uses a weekly checklist (ref ENM/02) for bunds, the oil store, packing room sump, cooling towers, noise, odour, leak and spill checks, spill kits, foul water drains, surface water drains, guttering. The checklist for week 47 was completed to date. The last 4 weeks were checked and complete.

Bunds are checked for visible damage and content, and the contents pH tested before being discharged to the foul drain as appropriate.

The Hex and Phosphoric IBC's are stored on spill trays which fill with rain and are to be moved to a sheltered location by the year end.

The brooks on both sides of the factory are checked morning and afternoon. Weeks 44, 45 and 46 were not checked as required by the Duty Weekend Manager. The Environmental Manager stated that the DW Manager had carried out the checks on the brooks but had not recorded this as required.

Accident Management

The Accident and Emergency Plan is reviewed annually by the Senior Management Team. Responsibilities are defined.

E-learning is used for general environmental awareness. Each process area has process/area specific SOPs with environmental responsibilities specific to that process. Operators are reviewed annually for job competency by GTPR.

A mock emergency exercise was held on 27/11/12 by Horizons Scan.

The Chemical/ Oil/ Product Spillage SOP was reviewed. If a spill enters the surface water then the EA is to be contacted. If it enters the foul drain then the Evaporator Operator will be contacted (out of hours ETP cover) to contain the spill.

The Packing Sump-Pump Failure SOP (EP/P.6) was reviewed which lists the actions required if the sump high level alarm is activated.

Effluent Treatment Plant

The majority of ETP processes are automated. The poly aluminium chloride and polymer dosing are operated manually, but the site is looking to automate these in the future.

The capacities for containment of a large spill on site was discussed. The main ETP has a 400,000l capacity, but always contains between 200,000l and 300,000l of effluent. The time with least capacity is between 9am – 12am when vessel washings are sent to the ETP. The spike silo has a capacity of 100,000l and empties and fills throughout the day. The packing silo and heavy effluent silo (situated at the top of the site near the main road) have a capacity of 200,000l and again will be partially full and could be used for spill containment. The site is considering the installation of another spike silo.

If there was a large spill from the catastrophic rupture of a 55,000l tank then the ETP pump would be unable to process this fast enough. The Environmental Manager stated that the spill would stay within the concrete / sewer area with the potential for milk to enter the surface water drain. This would be contained on site using site drain blockers before being pumped out by tanker for disposal.

The site is tankering 100,000l a day for land spreading.

Site applied to increase their consent with DCWW in June 2013 (not consented as yet). The operator is scoping a document for further treatment of the condensate and permeates mix. Phase 1 of the project will discharge to the River Cefni. Max flow will be 25m³/hr, 400m³/day. Phase 2 of the project will allow the water to be reused in the process.

Outstanding CAR Actions

The concrete area by the chemical storage was to be placed on the maintenance schedule and the condition assessed by the end Aug 2013. Will be done by the end of the year, depending on the weather. Will use a chemical resistant concrete skim rather than digging down and re-laying the concrete. The other action of installing a concrete bund to direct potential spill towards site has not been completed as area is under construction (new reception area). Once the construction work is complete then this will be done.



EPR Compliance Assessment Report

Report ID: BV8024IW/0194747

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

Site	Llangefni Dairy	Permit	BV8024IW
Operator/ Permit	Glanbia Cheese Ltd	Date	20/11/2013

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.

X

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			
E2	C3	All clay site sewers are planned to be replaced by steel within 2 years. Please submit date/plan by which this will be complete. Ensure sewers are maintained and assessed.	28/02/14
G2	C4	Ensure all site operators complete required check sheets.	31/01/14

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.