

EPR Compliance Assessment Report

Report ID: BV8024IW/0214814

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	10/06/2014			Time in	10:00	Out	17:00
What parts of the permit were assessed	Effluent treatment and disposal, surface water discharge						
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge	
Recipient's name/position	Baron Walkden, HSE Manager						
Officer's name	Beth Voice, Lara Cubley			Date issued	21/07/2014		

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	N	
	2. Closure & decommissioning	NA	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	C4	1.3.1
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	A	
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	A	
	4. Sewer	A	
	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	A	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	C3	1.5
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
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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

OK FOR PUBLIC REGISTER

CLOSED TO PUBLIC REGISTER

19-8-14

JB EORM

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.

Beth Voice and Lara Cubley carried out a site inspection which included landspreading, discharge to sewer and to surface water. The disposal of effluent is an issue which may limit site expansion and various projects are in progress to address this. The site has good tracking systems for data which will allow environmental and operational improvements to be made.

Effluent

The heavy effluent tank is used for bulk storage before being discharged to the ETP or tankered off for landspreading. A project is in place to reduce the fines within the backflush to allow additional removal of solids.

1200m³/day effluent is sent to the ETP (limited to this by the trade effluent consent). The balance tank at the ETP has a capacity of 400,000 litres and the buffer tank (spike silo) has a capacity of 100,000 litres. Note that the balance tank is usually 35% full thereby reducing capacity available to 260,000 litres.

300,000 litres of permeate and 200,000 litres of condensate (from the evaporator and reverse osmosis plants) bypass the ETP and run direct into the Welsh Water flume.

The site uses 700,000 litres potable water per day.

Glanbia has a decision tree for spill containment based on tank capacities and operational issues. If a 140,000 litres silo were to catastrophically fail during a time of high level in the ETP then the site would be unable to contain the spill. All silos have high level alarm which would automatically close the valve. The level controls are recalibrated every 6 months, last calibrated 06/03/14. The operators must complete training modules on silos and tanks.

The DAF unit can process a maximum of 55m³/hr, the limiting factor being flow rather than concentration. The site carried out a stress test a few weeks previously by increasing the concentration of the effluent to the DAF (removed 25% of the 'clean' stream) and were still able to process the water to a suitable condition at rates of 30-42m³/hr. The maximum theoretical flow of this stream at higher concentrations is 50m³/hr although this may be limited as solids and phosphate concentrations increase.

Update on the permeate/ condensate reuse project

The project brief for permeate and condensate reuse has been submitted to the directors and it is expected that vendors will be approved Jan/Feb 2015.

Sludge

The site generates 154te sludge/week from four parts of the process – the DAF sludge, heavy effluent, whey, and liquid waste from the balance tank. Sludge spreading has increased significantly during 2013 due to the site being unable to process increased effluent levels. The trade discharge consent increase in May 2014 from 716m³/day (max 45.5m³/hr) to 1200m³/day will result in reduced landspreading.

The site requires a contingency plan for bad weather, as discussed in the previous site inspection. The site has continued to landspread throughout the winter months during which time the rainfall was significantly higher than the long-term average for North Wales.

Action: Please submit a contingency plan for the site regarding landspread wastes to NRW by 30/09/14.

Action: Review the EWC's to ensure that the codes used for the four landspread wastes are correct. To be submitted to NRW by 31/08/14.

Other

Action: Please clarify the strength of the nitric acid being stored for production CIP. The letter requesting a minor operation change dated 10/04/12 refers to acid strength of 1.5%. To be submitted to NRW by 31/08/14.

Action: Effluent was observed to be running from line flushing onto concrete. It is generally best practice to connect lines direct to sewer. Please review this situation and submit an improvement plan by 31/08/14.

Breach of Permit

1. The discharge limits at emission point W2 for BOD and suspended solids are 6 mg/l and 30mg/l respectively. The sample dated 19/03/14 was at the limit for both of these determinands. Reported results show that the site has been close to the emission limit value on several occasions for this discharge point dating back to 2011.

New drainage was installed on 23/01/14 to re-route part of the surface water from the effluent treatment plant (ETP) to discharge point W2. This has reduced the loading of rainwater to the ETP from 350m³ to 160m³ per week, based on a weekly rainfall of 44.1mm (this value ties in with max weekly rainfall). An additional 190m³ /week will discharge via emission point W2.

Action: Site need to investigate why they are operating so close to the emission limit value and how this can be reduced. Report to be submitted by 30/09/14.

Action: The site should review the interceptor design to ensure it can cope with the additional flows. Report to be submitted by 31/08/14.

CCS3 G4 Permit condition 1.5 minor operational change

NRW should be informed of minor operational changes before they are implemented.

2. Site expansion is limited by waste water generation. The increase in the trade effluent consent to 1200m³/day from May 2014 has resulted in the site being compliant with its consent.

It would have been beneficial to inform NRW of changes regarding the Trade Effluent Consent.

CCS4 C2 Permit condition 1.3.1 management condition

ETP procedures were not updated to reflect the varied trade effluent consent limits.

Action: ETP procedures are to be updated to reflect the new trade effluent consent limits. To be completed by 31/08/14.

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Operator/ Permit	Glanbia Cheese Ltd	Date	10/06/2014

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.			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			
C2	C4	Update ETP procedures to reflect the varied Trade Effluent Consent limits	31/08/14
G4	C3	Review the interceptor design to ensure it can cope with the additional flows	31/08/14

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.