

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

Site	Treuddyn Poultry Farm EPR/KP3838WP	Permit Ref	KP3838WP		
Operator/Permit holder	Hook 2 Sisters Ltd.				
Regime	Installations				
Date of assessment	11/04/2018	Time in	09:30	Out	11:00
Assessment type	Audit				
Parts of the permit assessed	All				
Lead officer's name	Matthews, Lorraine				
Accompanied by					
Recipient's name/position	Andrew Irving/ Environment Manager	Date issued	02/05/2018		

### 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
C2 - General Management - Management system and operating procedures	C3	3.2
C4 - General Management - Storage, handling labelling and Segregation	C2	1.1
D2 - Incident Management - Accidents, emergency and incident planning	C3	1.1
E1 - Emissions - Air	C3	3.1
	C2	1.5
E2 - Emissions - Land and groundwater	C3	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.

<b>Number of breaches recorded</b>	<b>6</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	78
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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

### Breaches of permit:

Broken asbestos is lying exposed on the ground. This asbestos is from the removal of the sheds 4 years ago and was double bagged. However, the bags are now ripped open exposing the asbestos. This is a serious breach of permit conditions and the asbestos must be made secure as soon as possible and removed no later than the 16 May 2018.

The point source emissions and size of sheds on the site has changed with the erection of the new sheds 4 years ago. You must submit an application to vary the permit by the 2 August 2018.

Hazardous waste transfer notes must be in place for the removal of any hazardous waste, including fluorescent tubes, and an appropriate waste carrier used for the removal. Guidance on this has been sent to you.

You were asked at the time of the visit to forward to me a copy of an updated Accident Management Plan which was subsequently sent. However, the AMP which was sent was a general one and not site specific to Treuddyn and no drainage plan was included. Please forward a site specific AMP by the 2 June 2018.

During the time of the visit an oil spill was occurring from an oil container stored in a trailer owned by a contractor. This oil was escaping from the site and travelling down the lane. The spill had been stopped and shavings had been deployed to soak up the spilt oil. Please ensure that any potentially polluting material is stored appropriately so that spillages or leaks are contained.

### Other conditions discussed:

- Good maintenance records are kept. However, regular inspection of the settlement pond, ideally after every crop, including the discharge point should be included.

- In house training is planned specifically in relation to the permit

- Although not stocking over permitted limits, it was established that the actual capacity of your new sheds is higher than what is detailed in the permit. As you are required to vary your permit, you must include this increase in capacity of your sheds in the variation.

- Manure Management - an agreement needs to be put in place with any third parties who remove and spread the poultry litter from the farm with their details stating that they will comply with CoGAP, NVZ or any other relevant legislation and guidance.

- You were informed to look into what happens with any waste oil, oily rags etc produced from the servicing of the generator. Guidance was sent to you detailing that this type of waste must be removed by an authorised waste carrier and appropriate hazardous waste consignment notes must be in place.

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0033278**

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Operator/Permit holder	Hook 2 Sisters Ltd.	Date	11/04/2018

### 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.

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			
E1	C3	Vary permit to reflect changes	02/08/2018
C2	C3	Ensure appropriate paperwork is in place, an appropriate waste carrier is used and that the waste is sent to an authorised facility. Guidance sent to operator.	02/05/2018
D2	C3	Accident Management Plan forwarded following the visit. However, it is not site specific and no drainage plan is included	02/06/2018
E2	C3	Ensure that any potentially polluting materials are stored appropriately	02/05/2018
C4	C2	Secure asbestos and remove to an authorised facility using hazardous waste transfer notes	16/05/2018
E1	C2	Secure asbestos and remove from site to an authorised facility and use appropriate hazardous waste consignment notes	16/05/2018

## 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](mailto: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.