

Compliance Assessment Report

Report ID:
CAR_NRW0031375

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

Site	Llangefni prepared meats	Permit Ref	SP3430RL		
Operator/Permit holder	2 Sisters Food Group Limited				
Regime	Installations				
Date of assessment	13/03/2017	Time in	10:00	Out	13:45
Assessment type	Site Inspection				
Parts of the permit assessed	Drainage				
Lead officer's name	Kelk, Matthew				
Accompanied by	McGregor-Andrew, Sian,McClymont, James				
Recipient's name/position	Phil McGrath/ HSE Manager	Date issued	15/03/2017		

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
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
E3 - Emissions - Surface water	C3	2.2.2.3
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
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

An inspection was carried on site on the 13 March 2017 by Industry Regulatory Officers Matthew Kelk, Sian McGregor and James McClymont.

The following issues were discussed:-

Raised Ammonia Levels

Discussions were held around the recent 24 hour testing for Ammonia on the surface water drain at the boundary of the site, carried out between 15 January 2017 - 22 January 2017 . The testing had shown spikes in Ammonia of upto 3.89mg/l (18 January 2017, 15:00).

The source of contamination at present is unknown, various sources were discussed, including the possibility of an offsite source.

New SHE Manager on site to instigate further monitoring on surface water drains using onsite Palin test and set up further investigation.

Ammonia test carried out on site surface water drains prior to Natural Resources Wales (NRW) inspection on morning of 13 March 2017, indicating levels of 2.8mg/l Ammonia.

Breach of condition 2.2.2.3 of permit SP3430RL - only clean and uncontaminated water should be discharged from the surface water drains leading to the River Cefni. Scored one category 3 score for this breach.

Action

Site to send details of new monitoring and investigation procedure to NRW by 29 March 2017.

CAR form NW0026921 issued on the 23 February 2017 specified a deadline of 23 March 2017 to carry out an investigation into the surface water contamination and report to NRW. Due to staff changes and a new monitoring and investigation procedure instigated this deadline has been extended to 17 April 2017

Rainwater Data

Site have determined there may be a correlation between rainfall events and elevated Ammonia in surface water. Site are to acquire rainfall data and compare this to ammonia data collected during the 24 hour testing carried out in January 2017.

Action

Site to forward report on rainfall data comparison by 17 April 2017.

Surface Water Drains Repair

Following the CCTV survey by Aquasentry further remedial works were identified and Capex was being acquired by site for further works.

Site to submit action plan to NRW for completion of remedial works by 23 March 2017 as specified by previous CAR form NW0026921 issued on the 23 February 2017.

Sampling Methodology

Recommendation

Current sampling methodology was discussed and how turbidity can effect the operation of the Palin photo-spectrophotometer. At present the water sample is run immediately through the Palin Test kit upon receipt of the sample. Rainfall will cause the samples to be highly turbid and will affect the correct functioning of the spectrophotometer. It is recommended that the sampling/monitoring procedures are updated to allow the sample taken to be left for a sufficient period to allow solids to settle out of the water, to avoid giving false positives for Ammonia.

EPR Compliance Assessment Report

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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.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

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			
E3	C3	See text for detail	17/04/2017

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.