

Compliance Assessment Report

Report ID:
CAR_NRW0000050

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	11/03/2016	Time in	09:30	Out	14:40
Assessment type	Site Inspection				
Parts of the permit assessed	Drainage				
Lead officer's name	Kelk, Matthew				
Accompanied by					
Recipient's name/position	Richard Bladon, Steve Jones/ Health , Safety & Environmental Manager	Date issued	22/07/2016		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	C3	2.3.5
E3 - Emissions - Surface water	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 out on the 11 March 2016 by NRW Officer Matthew Kelk. The aim of the inspection was to assess progress with remedying the issues of contamination detected in the surface water drainage.

The site has been carrying out daily ammonia tests of the interceptor tank in the dispatch yard and of the drainage point at the boundary to the site.

Steve Jones provided a copy of the daily tests during the inspection, the results indicated that levels of up to 3.4ppm had been found in the surface water drain at the boundary to the site, which initially raised some concerns.

NRW officer took a water sample from the surface water drainage point at the boundary to the site. An indicative Ammonia field test was used on the sample. The test kit indicated low levels of Ammonia.

2 Sisters operative also took a sample of water from this drainage point and where placed in a spectrophotometer. Analysis returned results of 1.8ppm (mg/l), indicating some contamination in the water sample.

As such formal samples were taken from this drainage point and sent to NRW labs for analysis. Lab analysis returned results <0.5mg/l.

Email and phone correspondence received from site post visit indicating that the spectrophotometer was showing false high results for ammonia and that daily ammonia tests results were not reliable. Site have since purchased a new spectrophotometer.

Condition 2.3.5

All plant and equipment used in operating the Permitted Installation, the failure of which could lead to an adverse impact on the environment, shall be maintained in good operating condition.

All analysis kit used on site should be fully calibrated, please update maintenance procedure to reflect this, please forward to NRW by 6 May 2016.

Breach of condition 2.3.5, scored one category 3 score.

Advice and Guidance

Condition 5.1.1

The Operator shall notify the Agency without delay of:-

5.1.1.1

The detection of an emission of any substance which exceeds any limit or criterion in this permit specified in

relation to the substance.

Detection of high ammonia levels in surface water drainage should have been reported to NRW. Please update reporting procedure to NRW by 6 May 2016.

Site Walkover

A site walkover was carried out, an inspection was made of all external areas to ensure that no external sources of contamination could migrate into the external surface water drains - no issues identified.

Collapsed drain which has been identified by 2 Sisters as one of the causes of contamination was shown during the inspection. The drain has been partially relined, but is to be fully repaired during structural remedial works on site.

Blood pump failure led to blood entering surface water drainage during incident dated 12 October 2016. Remediation works from this incident were inspected. Bund placed around drainage to avoid repeat of incident

Internally the debone and dispatch areas were inspected to ensure that there were no other sources of contamination leading to the surface water drains. The surface water drain located internally within dispatch/debone was shown and is due to be screed over during the aforementioned remedial works.

Capex works approved for containment valves to be fitted to drainage on site and further interceptor fitted as per action plan forwarded to NRW on 12 February 2016. Building works to begin imminently.

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.

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			
B5	C3	To update maintenance procedure to include lab equipment by 6 May 2016	06/05/2016

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 reports 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 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.