

Compliance Assessment Report

Report ID:
CAR_NRW0026921

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	11/01/2017	Time in	10:20	Out	15:30
Assessment type	Site Inspection				
Parts of the permit assessed	All				
Lead officer's name	Kelk, Matthew				
Accompanied by					
Recipient's name/position	Rik Kandola/ Engineering Manager	Date issued	23/02/2017		

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
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
E3 - Infrastructure - Surface water	C3	2.2.2.3
F1 - Infrastructure - Odour	A	
F2 - Infrastructure - Noise	A	
F3 - Infrastructure - Dust/fibres/particulates and litter	A	
F4 - Infrastructure - Pests/birds and scavengers	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 by NRW Officer Matthew Kelk on 11 January 2017

The following issues were discussed:-

Surface Water Drains Repair

Following the further CCTV survey carried out by Aquasentry, further remedial work to the surface water drains have been identified.

CAPEX is being submitted for approval to Group for this remedial work.

Action

Site to provide action plan for completion of remedial work to surface water drains by 23 March 2017

All surface water drains identified during the last inspection have been sealed with silicone, this was evident during the site walkover, however it appears the seals are starting to deteriorate and that the drains should be sealed with more permanent measures.

Action

Repair seals to drains immediately, report on completion by 23 March 2017

Animal By Products Area

Troughs have been installed behind both Animal by Products (ABP) trailers and are now collecting the majority of the ABP effluent and channelling this to the foul drains.

Effluent Screen

New motors have been fitted to pump effluent, this has reduced blockages in the effluent screen and produced a noticeable reduction in noise.

24 Hour Testing

Condition 2.2.2.3:-

Emissions to water from the emission points specified in table 2.2.4 shall only arise from the sources specified in that Table.

Table 2.2.4: Emission point to water

Emission Point Reference or description	Source	Receiving Water
W1	Uncontaminated Surface Water Drainage	River Cefni
W2	Uncontaminated Surface Water Drainage	River Cefni

M and S Water Supplies have been carrying out further testing of the surface water drains. The auto-sampler was fitted on the 15 January 2017 and water analysed for Ammonia.

NRW received results from 2 Sisters for the 24 hour testing which occurred the week 15 January 2017 up to and including 22 January 2017.

Results indicated that spiked Ammonia levels of up to 3.89mg/l (18 January 17, 15:00).

Permit requires only clean and uncontaminated water is discharged via surface water drains from the site.

Breach of 2.2.2.3 scored one category 3 score.

Action

Site to carry out further investigation into why increases of ammonia were seen daily from the recent 24 hour testing. To send investigation to NRW by 23 March 2017.

NRW will be carrying out further inspection of the drainage on site in the near future.

Caustic Offload

The concerns raised during the previous inspection in relation to the caustic offload being close to a surface water drain was discussed. 2 Sisters Llangefni are confident that if a spillage of caustic were to occur that spillage kits and the penstock on the surface water drainage would be operated to avoid any offsite migration of Caustic to the River Cefni.

Adequate training and procedures for spillages will be assessed at subsequent inspections.

EPR Compliance Assessment Report

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Operator/Permit holder	2 Sisters Food Group Limited	Date	11/01/2017

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 details	22/03/2017

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.