

	EPR Compliance Assessment Report	Report ID: SP3430RL/0251864			
This form will report compliance with your permit as determined by an NRW officer					
Site	Llangefni Prepared Meats EPR/SP3430RL		Permit Ref	SP3430RL	
Operator/ Permit holder	2 Sisters Food Group Ltd				
Date	04/11/2015		Time in	10:00	Out 16:00
What parts of the permit were assessed	Odour and Water Contamination				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	Richard Bladon				
Officer's name	Matthew Kelk		Date issued	02/12/2015	

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	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	C4	4.1.7
	3. Site drainage engineering (clean & foul)	C3	2.3.5
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	C3	2.3.2 & 2.3.3
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	C4	2.8.1
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	C3	2.2.2.3
	4. Sewer	N	
	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	C4	4.1.2
h) Resource efficiency	1. Efficient use of raw materials	C4	2.4.1.2
	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	7	Total compliance score (see section 5 for scoring scheme)	12.4
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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

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.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by article 3 of the Natural Resources Body for Wales (Establishment) order 2012.

On the 4th November 2015 an inspection was carried out by Natural Resources Wales (NRW). The inspection primarily concentrated on odour control around the ABP area and surface water drainage.

The following issues were discussed and a number of breaches of permit SP3430RL were identified as outlined below.

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.

1.Surface Water Drainage

Findings (following the water pollution incident of 24 June 2015)

Following the discovery of contaminated water leaving the surface water drains from site in June 2015, 2 Sisters have undertaken a CCTV drainage survey of the surface water drainage.

- a) The report flagged up a number of deficiencies in the surface water drainage and as such 2 Sisters are putting together an improvement programme to remedy the deficiencies found.
- b) Site are to fit a check valve at the point the surface water drainage leaves the boundary of the site, so if any contamination is found, the system can be sealed quickly. Fitting of the valve is under capex approval at present.
- c) Whilst undertaking the CCTV survey, the drains have been cleaned when any issues have been found.
- d) Whilst the condition of the drainage system has been established, site are to carry out a full flow survey to ensure that it understood the exact flow of all the drains on site.
- e) On a weekly basis site are taking samples of the surface water drainage, these are being analysed for M and S Water Supplies.
- f) It is considered by site that a potential source of contamination to the surface water drains was the washing of intake wagons, that lead to a detritus and organic loading entering and filling up the inceptor chambers on site.

The wagons are under control of an external company, Hook 2 Sisters, the company have been informed verbally to stop washing wagons in the 'clean' area of the site and only in the area of the site where 'washings' will enter the foul system and be directed to the site Effluent Treatment Plant (ETP).

It was discussed that site are to send a letter to Hook 2 Sisters to inform of the above change. It was also discussed that a procedure should be written to ensure that site has adequate control and supervision over external transport contractors on site.

- g) Site planned preventative maintenance schedule has been updated to include regular maintenance of the drainage system

Action/Compliance

Breach scored one category three score - due to maintenance issues indicated by drainage CCTV survey.

The following to be submitted by 02 January 2016:-

- a) Send drainage improvement programme to NRW,
- b) Site to inform NRW of timescales for the installation of the check valve.
- c) To inform NRW of the timescales for completion of directional flow survey.
- d) Forward results of all chemical analysis undertaken to date by above date.
- e) Forward copy of letter to Hook 2 Sisters and procedure for supervision of contractors on site in the clean area.
- f) Maintenance schedule to be forwarded to NRW.

2. Water Pollution Incident - Emissions To Surface Water (4 November 2015)

Emissions to Surface Water

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

Finding

During the inspection a sample was taken of the surface water drainage system from the manhole where the surface water drainage leaves the site boundary.

An indicative Ammonia field kit was used on the water sample and it indicated that the water had a high ammonia content. A formal sample was served on the site.

Lab results for the surface water sample showed:-

Ammonia – 2.74 mg/l

Suspended Solids – 170mg/l

COD – 817 mg/l

BOD – 373mg/l

Chloride – 267 mg/l

It should be noted that when the sample was taken from the surface water drainage the water appeared quite brown. There was evidence of brown discoloration in the River Cefni around the culvert discharge point.

Compliance/Action

Under condition 2.2.2.3 of permit SP3430RL only uncontaminated water is permitted to leave the site surface water drainage.

The above sample results shows that contamination is still entering the surface water drainage system and discharging to the River Cefni.

The above breach attract one category three CCS score.

NRW require that 2 Sisters submit a full action plan that details how 2 Sisters Food Group intend to further investigate the source of pollution on site and to mitigate any further pollution entering the site surface water drainage.

Action plan to be forwarded to NRW by 2 January 2016.

3. Training

Permit Condition 2.3.2:-

The permitted installation shall be supervised by staff who are suitably trained and fully conversant with the requirements of this Permit.

Permit Condition 2.3.3:-

All staff shall be fully conversant with those aspects of the Permit conditions which are relevant to their duties and shall be provided with adequate professional technical development and training and written operating instructions to enable them to carry out their duties.

Finding

It was identified during the EMS audit on 20 August 2015 that limited training had taken place with regards to rollout of new EMS procedures. As of 4 November 2015 procedural training had not been undertaken.

Compliance/Action

Training to be carried out by 2 January 2016

The above breach attracts one category three score.

4. ABP Odour

Discussions were held around the issue of odour from Animal By Product (ABP) waste as highlighted in CAR form SP3430RL/0250078 issued on 23 October 2015.

The following are being instigated to avoid odour issues from ABP lorries loading/transfer:-

1. The external waste contractor is now coming in with empty ABP lorries.
2. Lorries are now arriving on site late at night.
3. Procedure has been put together by RB for offal loading/offloading and has submitted to NRW on 24 November 2015.

ABP area plans

A new building covering the ABP area is being installed, please send details of the building to NRW

5. Monitoring returns

Performance indicators received for 2014 - form E1, PI1, R1 and WU1 received 25 November 2015

Monitoring data received 13 November 2015 for Effluent Treatment Plant (ETP) emissions to sewer from point S1 – for Mercury, Chemical Oxygen Demand (COD) and Average Effluent Flow:-

Q1 2014 (Jan – March), Q2 2014 (April – June), Q3 2014 (July – September), Q4 2014 (October – December).

Q1 2015 (Jan – March), Q2 2015 (April – June), Q3 2015 (July – September).

It is noted from this data that the ETP is running within the limits set by permit SP3430RL.

Previously scored for late submission on CAR form SP2430RL/0248647, dated issued 24 September 2015.

Condition 4.1.2.

The Operator shall, unless otherwise agreed in writing, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit:-

4.1.2.1 in respect of the parameters and emission points in Table S2 to Schedule 2;

4.1.2.2 *For the reporting periods specified in Table S2 to Schedule 2 and using the forms specified in Table S3 to Schedule 3;*

4.1.2.4 *to the Agency within 28 days of the end of the 28 days of the end of the reporting period.*

Condition 4.1.7

The Operator shall, within two months of the date of this permit, submit a detailed site protection and monitoring programme, in accordance with and using the appropriate template format given in the Land Protection Guidance. The Operator shall implement and maintain the Site Protection Monitoring Programme (SPMP) submitted under condition 4.1.7, and shall carry out regular reviews of it at a minimum frequency of every 2 years. The results of such reviews and any changes made to the SPMP shall be reported to the Agency within 1 month of the review or change.

Condition 2.8.1

The Operator shall maintain and implement when necessary the accident management plan submitted or described in response to section 2.8 of the Application. The plan shall be reviewed at least every 2 years or as soon as practicable after an accident, whichever is the earlier and the Agency notified of the results of the review with 2 months of its completion.

Condition 2.4.1.2

Carry out periodic waste minimisation audits and water use efficiency audits. If such an audit has not been carried out in the 2 years prior to the issues of this Permit, then the first such audit shall take place within 12 months of its issue. The methodology used and an action plan for increasing the efficiency of the use of raw materials or water shall be submitted to the Agency within 2 months of completion of each such audit and a review of the audit and a description of progress made against the action plan shall be submitted to the Agency at least every 4 years thereafter;

Finding

The quarterly monitoring data for WU1 (water usage) for 2015 specified by the permit and the above reports have not been submitted to NRW by the designated time:-

Compliance/Action

Breach of condition 4.1.2, condition 4.1.7 and condition 2.8.1, condition 2.4.1.2 scored four category 4 scores. Please supply above monitoring/reports to NRW by 02 January 2016.

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Operator/ Permit	2 Sisters Food Group Ltd	Date	04/11/2015

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.			
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.			X

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			
B2	C4	See text for details	02/01/2016
B3	C3	See text for details	02/01/2016
C1	C3	See text for details	02/01/2016
D2	C4	See text for details	02/01/2016
E3	C3	See text for details	02/01/2016
G4	C4	See text for details	02/01/2016
H1	C4	See text for details	02/01/2016

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 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.