

Compliance Assessment Report

Report ID:
CAR_NRW0032189

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	08/09/2017	Time in	10:00	Out	15:00	
Assessment type	Site Inspection					
Parts of the permit assessed	All					
Lead officer's name	Kelk, Matthew					
Accompanied by	Ross, Stuart					
Recipient's name/position	Phil McGrath/ Health and Safety Manager	Date issued	02/10/2017			

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	C3	2.3.5
B4 - Infrastructure - Containment of stored materials	C3	2.2.5.1
C2 - General Management - Management system and operating procedures	C3	1.3.1
E2 - Emissions - Land and groundwater	C3	2.2.7.2
E3 - Emissions - Surface water	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	A	
F5 - Amenity - Deposits on road	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	4	Total compliance score (see section 5 for scoring scheme)	16
------------------------------------	----------	---	-----------

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 8 September 2017 by Industry Regulatory Officers Matthew Kelk and Stuart Ross.

Prior to site walkover, discussions were held around compliance with the requirements of the regulation 36 notice served on the 9 June 2017. (the position below has been repeated within email sent to site on 25/09/2017)

During the discussions it was agreed that whilst it could be seen that an investigation had been carried out, to satisfy the requirements of the regulation 36 notice much further detail and evidence needed to be provided for each step of the investigation carried out to date.

It was established during the inspection that 3 potential contamination sources had been identified from your investigations:-

- Upwelling borehole,
- Offsite sewage asset,
- Bird faeces on roof.

2 further sources were suggested by NRW whilst on site:-

- Large inceptor tank which you have added to your PPM
- Underground foul pipe which runs between the effluent balance tank and effluent sumps.

These 5 potential sources were to be added to an action plan with realistic timescales for completion and 2 Sisters will forward this to NRW for approval.

This information should be provided to NRW by Friday 6 October 2017, to confirm the extent of your investigation to date and an action plan with timescales for further work. This will enable NRW to assess whether the requirements of the notice has been satisfied.

The following issues were identified on the site walkover:-

1. Sludge Tank

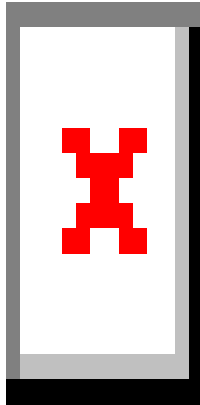
Condition 1.3.1

Without prejudice to the other conditions of this Permit, the Operator shall implement and maintain a management system, organisational structure and allocate resources that are sufficient to achieve compliance with the limits and conditions of this Permit.

Contaminated air return valve left in open position. (See picture 1 below). Odorous air will escape from pipe upon sludge entering tank.

Site procedure dictates that valve should be left closed following sludge collection.

Scored one category 3 score for failure to follow sludge collection procedure (*condition 1.3.1*)



(Picture 1)

2. Concrete Condition

Condition 2.2.7.2

No emission from the Permitted Installation shall be made to land

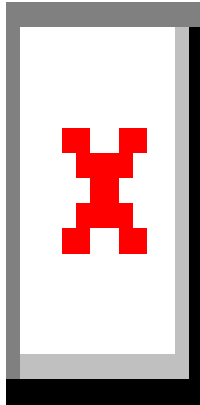
Condition 2.3.5

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.

Evidence of poorly maintained concrete hard standing in area where DOA/diseased birds are dyed (see picture 2 below), potential for underlying ground/groundwater to become contaminated.

Action

To repair concrete around this area and to inform NRW upon completion of works.



Picture 2

Scored one category 3 score for breach of condition 2.2.7.2

Scored one category 3 score for breach of condition 2.3.5

3. Containment

Condition 2.2.5.1

Subject to condition 2.2.5.2 below, the Operator shall use BAT so as to prevent or where that is not practicable to reduce fugitive emissions of substances to water (other than Groundwater) and sewer from the Permitted Installation in particular from

all structures under or over ground

surfacing

bunding

storage areas

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.

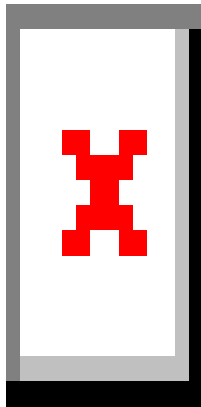
a) Leaking substances within the sludge tank bund from the chemical scrubber are causing the surface of the bund to corrode. (See picture 3 below). Potential to weaken bund and the effectiveness of the containment and additionally potential to cause the leaking scrubber chemical to leak to ground.

Breach of condition 2.2.5.2

Breach of condition 2.3.5

Action

To remedy leak in area and repair any damage to concrete in bund. Inform NRW upon completion.



Picture 3

b) Large number of drip trays on site full of rainwater, rendering them ineffective in ability to contain liquids in an event of a spill.

Breach of condition 2.2.5.1.

Action

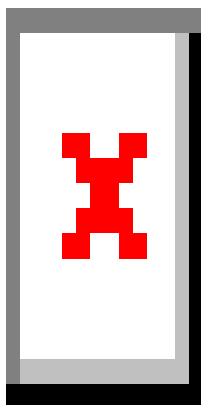
To review planned preventative maintenance for the emptying of rainwater from bunds. To forward to NRW by 2 November 17.

c) IBC of liquid (Excel Extra) not kept on bund/Drip tray (see picture 4 below). No containment used for this substance. See picture below.

Action

Retrain operatives to remind of importance of storing liquids within bunded area. Forward training logs to NRW by 2 November 17.

Breach of condition 2.2.5.1.



(Picture 4)

d) Blood collection - blood is drained from lorries into dolavs prior to being moved to the Effluent Treatment Plant (ETP) area.

Evidence of blood filled dolav's being left in close vicinity to surface water drains. (See picture 5 below). High potential for spillage to the surface water drainage system.

Blood has a very high Biological Oxygen Demand (BOD) and has potential to overload the ETP.

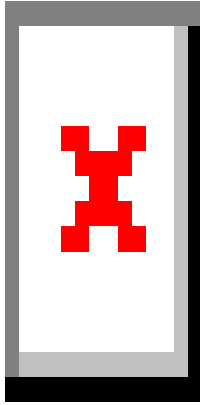
Strong odour witnessed on site after offloading blood filled dolav to foul drains (see picture 6 below). High potential for offsite odour.

Action

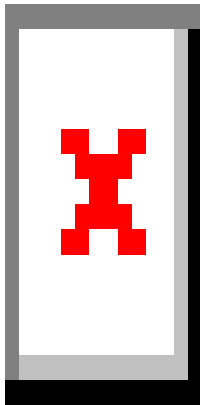
To review procedure for blood collection from lorry trailers to ensure avoidance of the risk of odour migration, fly infestation and risks to surface water drains and provide reviewed procedure to NRW by 2 November 2017.

To investigate the impact of discharging blood to the ETP and whether there is potential to discharge directly to blood tank and provide a report to NRW by 2 November 2017

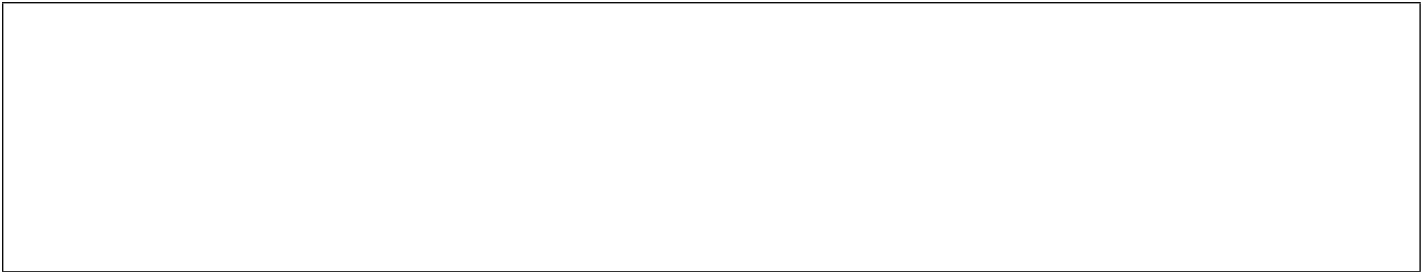
Breach of condition 2.2.5.1.



Picture 5



Picture 6



EPR Compliance Assessment Report

**Report ID:
CAR_NRW0032189**

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	Date	08/09/2017

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.

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			
B1	C3	See text for details	02/11/2017
E2	C3	see text for details	02/11/2017
B4	C3	See text for details	02/11/2017
C2	C3	See text for details	02/11/2017

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.