

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

Site	Dowlais Slaughterhouse EPR/AP3433ES	Permit Ref	AP3433ES		
Operator/Permit holder	2 Sisters Red Meat Limited				
Regime	Installations				
Date of assessment	23/04/2018	Time in	13:00	Out	15:30
Assessment type	Report/Data Review				
Parts of the permit assessed	Surface water				
Lead officer's name	Taylor, Richard				
Accompanied by	Griffiths, David				
Recipient's name/position	Matt Dight/ Environmental Manager	Date issued	26/04/2018		

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
E3 - Emissions - Surface water	C3	6.3.2
	C3	6.3.2

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	2	Total compliance score (see section 5 for scoring scheme)	8
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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

The purpose of this CAR form is to view the current surface water situation and record a follow-up site inspection after the surface water pollution incident observed by NRW on 6th Feb 2018. A 7 point improvement plan was drafted on the last CAR form. This CAR records the interim progress made against each point. The reporting deadline was 1st May.

A. Surface water management plan update-

1. Booms spill kits - One spill kit was in place between W1 and W2, with another reportedly ordered.
2. Sluice gate - Plans to alter the existing gate so that it can be used as an auxiliary containment gate are being drawn up.
3. Oil separator specification - Outside contractors tasked with evaluating whether the current separator falls below specification.
4. Clean up waste transfer notes (from site clean up operation between 6th-8th Feb 2018) - Site to forward to NRW at nearest opportunity.
5. Lab results from surface water pollution - received by NRW on 22nd March 18 from Lab samples analysed on 9th Feb These show a range of BOD at between <4.0mg/l and 4.0 mg/l - note; the limit of detection for the equipment used is 4.0mg/l. Chemical Oxygen Demand ranges between 12 and 22mg/l, and Total TPH C6-C40 is below the limit of detection at <10micro grams per litre. The site has limits placed on it through the permit for its surface water discharge for mineral oil and hydrocarbons at 5mg/l and Total Suspended Solids at 50mg/l only.
6. Evaluation of Surface water management report - a summary report is required to satisfy this request due 1st May 2018.
7. Evaluate shift duty walk-round to identify potential pollution sources - Site report that this occurs regularly, but will formalise this into a written procedure.

The surface water management situation highlighted the need for the site to vary their permit. This is currently being evaluated by site. Presently the permit boundary is not aligned to the fenced area of the site. Further, more detailed planning is required by site to bring the surface water into the permit boundary. This will also bring the 7 points above under control.

B. Current Surface Water situation

The W1 and W2 surface water outlets were seen on the day and found to be clear of obvious pollution. Booms were in place at varying intervals along the length of the watercourse and were being changed on a periodic basis. NRW recognise that this is a temporary arrangement and is satisfactory until a new surface water management plan is in place at this site. At present there is no time limit for this plan to be in place, but the 1st May 2018 was previously stated as the time for answering the 7 point plan outlined above, and is cited again in this CAR form as the target date for the answers to be in place (which forms the basis of the plan). Site should request an extension to this deadline if it is required, as NRW understand that this is likely to form part of a permit variation application.

C. Other Site issues - Round Up of Site performance.

15 Jan 18 - Site sent Fugitive emissions report to satisfy permit condition 9.16 on time. Report accepted in full

29 Jan 18 - Site sent Annual reports on time - plus Q4 2017 report. All emissions were within permit limits.

29th March 18 - Site sent 2 x Schedule 1 notifications for surface water exceedences for 8th Feb 2018 and 22 Feb 2018. Mineral Oil and hydrocarbons on 8th were 21.2 mg/l and 17.4mg/l on the 22nd respectively against a permit limit of 5mg/l. Both have been combined into a Cat 3 breach of permit condition 6.3.2. The same approach has been taken to the exceedences of Suspended solids where 58mg/l was recorded on 8th and 68mg/l on 22nd against a permit limit of 50mg/l. **Result - 2x Cat 3 breaches.**

D. Actions

1. Site to send Waste transfer notes for site clean up on 6-8th Feb.

2. Site to send summary report of the above management plan by 1st May 2018.

END.



EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033241**

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Operator/Permit holder	2 Sisters Red Meat Limited	Date	23/04/2018

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	Assess surface water measures in place as per previous CAR form	01/05/2018
E3	C3	Evaluate surface water management as per CAR forms	01/05/2018

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.