

Compliance Assessment Report

Report ID:
CAR_NRW0033572

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	03/07/2018	Time in	N/A
Assessment type	Report/Data Review		
Parts of the permit assessed	Surface water, fugitive emissions,		
Lead officer's name	Taylor, Richard		
Accompanied by			
Recipient's name/position	Matt Dight/ Environmental Manager	Date issued	17/07/2018

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
E1 - Emissions - Air	C3	2.8.1
E3 - Emissions - Surface water	C3	6.3.1
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	C3	2.1.2

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	3	Total compliance score (see section 5 for scoring scheme)	12
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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

2 Sisters Abattoir, Dowlais Top.

Permit AP3433ES

Actions from previous CAR form

1. Surface water management plan. Site sent a summary email to NRW on 30 th May outlining progress made towards the 7-point surface water improvement plan cited in the last CAR form. This met the deadline on May 1 st .	The plan was reported to be in a status of review and evaluation. Site report that they have commissioned a full surface water drainage verification survey to be carried out leading on to a review of the current system plus an assessment of the interceptor's specification.	The original deadline of May 1 st has passed. The surface water system in place remains temporary. Site are therefore required to provide an update on the current situation and submit their plan for improvements. This needs to be in place to reduce the risk of pollution as soon as practicably possible. A new deadline of 1st Sept 2018 has been set for site to report the improvement plan to NRW.
2. Waste transfer notes	Site successfully sent the relevant WTN's to NRW on request.	Issue closed

Summary of returns.

Issue	Discussion	Outcome
1. Refrigerant gas loss reported on 8 th June 18.	The R448a is a blend made up of the following 1. Difluoromethane 26% 2. Pentafluoroethane 26%	The constituent parts of the refrigerant are converted to their tonnes of CO2 global

Reported as '900 kilos of R448a, which is a HFC low global warming potential alternative to R404'.	3. 1.1.1.2 Pentaflouroprop 21% 4. 2.3.3.3 Tetraflouroprop 1.ene 20% 5. Trans 1.3.3.3.tetraflouroprop 1 ene. 7%(source-Honeywell R448a datasheet)	warming equivalent from The F Gas directive. 1. Diflouromethane 900kg x 26% x 675 = 157.95 t 2. Pentaflouroprop 900kg x 26% x 3500 – 819 t 3. 1.1.1.2 Tetraflouroethane 900kg x 21% x 1430 = 270-.27 Note – Tetraflouroprop and trans tetraflouroprop have no entry in the F Gas regs so are not counted here. Total CO2 equivalent of F Gas = 1247.22 tonnes. Result – 1 x Cat 3 breach of permit condition 2.8.1
2. Low pH was reported by Schedule 1 notification for a sample taken on 3rd May for treated effluent to sewer. PH reader reported to be subsequently replaced. Site effluent remains a sensitive issue. Complaints have been received by NRW regarding odour in the community. Site need to be vigilant that all measures have been undertaken in the management of site effluent to ensure that it does not breach permit consent limits and that maintenance and calibration of equipment is carried out as per the site management system.	Faulty pH probe appears to have been reading erroneously. A reading of 5.8 was reported on 13th June for an emission which took place on 3rd May 2018. This effluent was reportedly mixed with more site effluent prior to being sent to sewer. The low pH was not deemed to be a minor pollutant in itself, but indicative of the underlying management system. The breach is imposed for condition 2.1.2 where site is required to maintain all equipment in good operating condition. The pH probe was not working affectively for the purpose.	A Cat 3 breach of permit condition 2.1.2 has been imposed for equipment not being maintained in good operating condition resulting in a potential minor pollution incident. The pH probe is required to be on a recognised scheme for calibration, plus routine scheduled maintenance.
3. Surface water breach of permit limit. Site reported an excess of the permit limits on 13th June 18 for an emission which took place on 17th May 18.	Site reported a breach of permit limits for mineral oil and hydrocarbons with a reading of 6.6mg/l against a permitted max of 5.0mg/l. Booms are still in place to collect any surface solids, but the permit maximum is in place to	NRW issue a Cat 3 breach of permit condition 6.3.2 for exceeding the permit maximum for surface water to W1.

	protect this water course which flows outside the current permitted boundary yet is inside the owned boundary. The location iss on the southern edge of the site draining Eastwards into the Nant Carno.	
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End

EPR Compliance Assessment Report

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Operator/Permit holder	2 Sisters Red Meat Limited	Date	03/07/2018

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.

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			
G1	C3	site has reportedly replaced the meter	01/08/2018
E3	C3	Improve operations	01/08/2018
E1	C3	Adhere to F gas regulations	31/07/2018

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.