

Compliance Assessment Report

Report ID:
CAR_NRW0033974

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

Site	Princes - Cardiff EPR/BX8289IW		Permit Ref	BX8289IW	
Operator/Permit holder	Princes Ltd				
Regime	Installations				
Date of assessment	20/09/2018	Time in	10:00	Out	13:00
Assessment type	Unknown				
Parts of the permit assessed	Pre application discussions				
Lead officer's name	Willey, David				
Accompanied by					
Recipient's name/position	Mark Thomas/ EHS Manager	Date issued	26/09/2018		

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
--	--------------	-----------------------

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	0	Total compliance score (see section 5 for scoring scheme)	0
------------------------------------	----------	---	----------

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

CAR Form following site visit on 20th September 2018

The following actions have been completed by the Operator:

ACTION: Site to ensure all contact details used to contact NRW are up to date.

All the NRW contact details are updated and posted along with the site Environmental Permit.

ACTION: Please confirm whether any of the spilled cranberry was lost to the sites surface water drainage system or was it contained within the sites effluent lines?

The spillage was contained by spill kit material and no cranberry juice was lost to the drainage system.

ACTION: Site to include a requirement in their EMS to use the notification Schedule as required by Condition 5 of the permit and the associated Schedule 1 – Notification of abnormal emissions. Princes Cardiff has in the past used the Schedule 1 notification for spillages that were not contained.

NRW will in future be informed of all site spillage.

ACTION: Water per tonne has increased over the past few years. Efficiencies being made at the site will improve these figures in coming years.

The major project development will include improved process department and production fillers; there will be a significant efficiency improvement from the new processes.

ACTION: Please confirm the unit that the effluent flow has been reported in.

The effluent is monitored by an MCERTS metering system and is measured in cubic metres. With the new process being installed a significant improvement in efficiency.

ACTION: Could Princes please inform NRW what backup power is used during these Triad periods?

During winter TRIADs the plant's production lines are stopped and do not run for the period of

extra cost.

ACTION: Please could Princes clarify why there are differences between the two reported amounts.

Waste juice is not reported in the annual reports, the waste juice is reused.

ACTION: Princes to review the OPRA profile in light of the proposed changes at the site.

The OPRA profile will be reviewed during the permit variation work with Environmental Compliance Limited.

The following actions have been carried over for further assessment:

ACTION: Site to inform NRW of the techniques to prevent the contents from reaching surface water drains if there is high rainfall at the time of the incident. High rainfall would dilute the viscose contents and may lead to contamination of the surface water drains.

All employees employed in the handling of liquids have been trained on emergency spillage procedures. The drains are protected as a priority. The storage arrangements have changed since the spillage incidents.

ACTION: Site to look at the response to a large spill on site. There could be a period until the tanker arrives at site to pump off the spilled liquid. Operator to check the containment capacity of the spillage in the interim period?

The drainage system around the tanker off load area drains to the effluent system. The current project will be taking bunding into account.

ACTION: Site to provide details of the updated maintenance checks as well as ensuring the accident management plan, planned preventative maintenance, fugitive emissions plan and the EMS are updated. The requirements of the Regulation (EU) No.517/2014 on fluorinated greenhouse gases and repealing Regulation (EC) No 842/2006 should be taken into consideration, specifically Chapter II Containment.

The accident management plan, fugitive emissions plan will be completed in September 2018.

ACTION: Princes to inform NRW of the destination of the tetra waste following processing at the Hull site.

A waste management audit was planned for the Tetra Pak waste process in March 2018 but due to bad weather was cancelled on the day. With the change to SIG packaging an audit will be planned in the autumn 2018.

ACTION: Operator to ensure the storage of barrels is stored within the bunded area to ensure that any spillages can be contained and avoid discharge to the surface water drains.

The storage of concentrate drums are stored within the metal bunded area, this control has been

improved.

ACTION: Operator to investigate the use of the interceptor located to the south west of the site as a measure to prevent further pollution in case of an incident in the yard.

The interceptor use will be investigated as part of the major project development of the south yard area.

ACTION: Please confirm the maximum capacity per line under the current operation and what would be the maximum capacity following the changes made at the site. The capacity is based upon a finished product production capacity excluding packaging.

The specification of the process and filling equipment will be finalised during September 2018. The site will send this information and arrange site review meeting. The site has made arrangements for Environmental Compliance Limited to co-ordinate the Environmental Permit variation process. The site can confirm that the BREF document will be considered during the variation process.

Pre application discussions

The purpose of the meeting was to discuss the permitting requirements for the variation and to ensure the Operator supplies all the relevant documents and risk assessments. A member of the Permitting Team and the Operators consultants, Environmental Compliance Limited, were in attendance.

The level of variation was discussed with the Operator needing to justify the level of variation applied for. Ultimately the Permitting team will decide whether the level of variation is appropriate based on the document, 'Regulatory Guidance Series, RGN8: Substantial changes in operation at installations, mining waste facilities and other facilities involving solvent and combustion.' The document sets out in Section 5 what constituents to be a substantial change. The applicant should use this guidance when justifying the level of variation to be applied for.

The Food, Drink and Milk Best Available Techniques Conclusions (BATC) is in draft format pending it being published in the summer 2019. With this in mind Princes should make reference to the BATC in their variation ahead of the permit review following the publication of the BATC.

The BATC can be found here:

<http://eippcb.jrc.ec.europa.eu/reference/fdm.html>

The application should represent the site boundary, further guidance on the site boundary can be found in the document:

https://cdn.naturalresources.wales/media/678707/part-b2_guidance_final.pdf

The document states in section 5, Supporting Information:

You must send us a site plan that identifies all of the land on which your activities or waste operations, or mining waste operations (including mining waste facilities) (or all both) will take

place.

The site plan should provide a date and a reference and must be drawn accurately to a defined scale.

The outline of the site must be clearly marked in green. It will be helpful if local features are shown on the plan to help us place the site in its local environment.

For water discharge activity permits your site plan must show the facility and the outlet location where the effluent is discharged to the receiving water.

The outline of the plan must be clearly marked in green.

The Operator is looking to apply for the variation in quarter 3 / 4 in 2018.

END

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033974**

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

Site	Princes - Cardiff EPR/BX8289IW	Permit Ref	BX8289IW
Operator/Permit holder	Princes Ltd	Date	20/09/2018

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.

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			

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.