

Compliance Assessment Report CAR_NRW0041772

Permit being assessed: GP3235GH.

For: Dolwen Abattoir EPR/GP3235GH, held by Pilgrim's UK Lamb Ltd

At: Dolwen Abattoir , Dolwen, LLANIDLOES, Powys, SY18 6LX.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 03/05/2023 between 11:00 and 13:00.

Parts of permit assessed: SEE NOTES (Section 4)

NRW Lead Officer: Victoria Griffin.

Report sent to: Gareth Gower, Technical Manager on 19/05/2023.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Action only (X)	
E3 - Emissions - Surface water	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	C3 Minor	Condition 3.1.4

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	4

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
B3	See details below with regard to car park drainage	31/05/2023
G1	See details below regarding groundwater monitoring	31/05/2023

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

The Compliance Assessment Report (CAR) has been generated by the Natural Resources Wales (NRW) regulating Officer to comment upon the Q1 Monitoring Returns and the findings of a pre-arranged inspection of the Installation by the NRW Officer.

1. Q1 Monitoring Returns

Q1 2023 (January - March) monitoring results were submitted to NRW on 25/04/23 in accordance with Condition 4.2.3

1.1 Emissions to Water - Emission Point W1

Emissions to water for Q1 were tested on 10/01/2023, 21/02/2023 and 23/03/2023. All parameters were within the emission limit values (ELVs) defined in the Permit (S3.2).

2. Site Inspection

An inspection of the external areas of the Installation was undertaken by the NRW officer, who was accompanied by the Operator representative.

There are works and proposed works being implemented across the Installation to improve the accommodation and infrastructure.

Works was being undertaken at the time of the inspection to replace the existing gas oil fired boiler with a gas powered boiler. The Operator confirmed that the current bulk gas oil tank will remain in-situ to serve as a back up fuel supply.

The Effluent Treatment Plant (ETP) was not discharging at the time of the inspection due to maintenance being carried out. Discharge from the ETP is expected to recommence by the 5 May. The Operator confirmed that in the event that the capacity of the tanks is predicted to be exceeded the effluent will be removed via tanker.

Overall the Installation was clean and tidy and there were no apparent odour, noise or pest issues recorded.

2.1 Car Park

Work has commenced on the car park drainage and currently comprises the installation

and connection of a drain on the boundary of the car park to the main site drainage system. Car park drainage has yet to be installed and it awaiting CAPEX approval and works to improve the security office.

The Officer highlighted the potential constraints of the car park i.e. the down gradient slope of the car park away from the main site. Consideration needs to be given to the design of the drainage system, to avoid accumulation and potential overflow of surface water at the lowest point of the car park.

The Operator stated that CAPEX approval for the works are anticipated by the end of Q2 with the proposed works to be completed in Q4, however this has yet to be confirmed.

2.2 Groundwater

The groundwater monitoring programme is in the process of being designed and commissioned. Subsequent to the inspection an intrusive ground investigation to assess the groundwater has been undertaken.

Groundwater monitoring remains overdue and has been scored a C3 breach of Condition 3.1.4.

2.3 Non-hazardous Waste

The Operator has confirmed that non-hazardous waste is now sent for incineration (waste to energy) rather than to landfill.

3. Off-site Observations

The NRW Officer also undertook an inspection off-site along the northern and western Installation perimeter and there were no apparent odour, noise or pest issues recorded.

4. Actions

- **ACTION** - Subsequent to the site inspection, non-hazardous waste volumes for Q1 have been provided to NRW. Future non-hazardous waste records to be provided in accordance with timescales stated in the Permit.
- **ACTION** - The findings of the groundwater monitoring assessment is to be provided to NRW **two weeks following receipt of the report by the Operator and no later than 30 September 2023.**
- **ACTION** - Programme and timescales for car park drainage design and construction to be provided to NRW by **31 May 2023**. It is recommended that the engineering design of the car park drainage is provided to NRW for comment to prevent abortive work a minimum of **6 weeks** prior to the programmed commencement date.
- **ACTION** - an updated drainage is to be provided to NRW within 1 month of the completion of the drainage works in the car park.
- **ACTION** - an updated site plan, which includes any changes to accommodation and infrastructure is to be provided to NRW within 1 month of the completion of the works.

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If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.