

Compliance Assessment Report CAR_NRW0042918

Permit being assessed: AB3591ZQ.

For: Maelor Foods Limited, **held by:** Maelor Foods Limited

At: Maelor Foods Limited, Pickhill Lane, Cross Lanes, Wrexham, Wrexham, LL13 0UE.

Type of assessment: Audit,

Reason: Routine.

On: 28/11/2023 between 13:00 and 15:30.

Parts of permit assessed: See Below.

NRW Lead Officer: Philip Harper, accompanied by James McClymont.

Report sent to: Joe Rogers, Health Safety and Environmental Manager, on 28/12/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Information - Reporting	C3 Minor	4.3
IR2C - Operations - Operating techniques	C3 Minor	3.3.3(b)
IR2C - Operations - Operating techniques	C3 Minor	2.3.1(a)
IR1A - Management - General management	C3 Minor	1.1.1
IR1A - Management - General management	C3 Minor	1.1.1
IR1A - Management - General management	C3 Minor	1.1.1
IR1A - Management - General management	C3 Minor	1.1.1
IR1A - Management - General management	C3 Minor	1.1.1

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

Total non-compliances recorded	Total non-compliance score
8	32

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
IR4B	Report future incidents without delay,	Already completed

Criteria	Action needed	Complete by
IR2C	Action 5 in main text.	12/12/2023
IR2C	See Actions in main text	12/01/2024
IR1A	See actions in main text.	12/01/2024
IR1A	See actions in main text	12/01/2024
IR1A	See actions in main text	12/01/2024
IR1A	See actions in main text	31/01/2024
IR1A	See actions in main text.	12/01/2024

Compliance 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

Noise Complaint 8th October 2023

On the 8th October 2023, Natural Resources Wales received an incident report which described off site noise from Maelor Foods Ltd.

A discussion with the reporter indicated that the noise pollution started on the evening of Saturday the 7th October 2023.

As part of initial incident investigations by NRW, records of site perimeter checks were requested from the operator for review. A review of the daily environmental check sheets found that the data provided was unreliable.

It came to light that a member of site security who was responsible for undertaking the checks had not actually undertaken the activity although documentation had been completed. In addition it has been evidenced via CCTV that the individual did not leave the security lodge during that time frame.

NRW is of the view that had the daily environmental checks have been conducted as required by the site's environmental management system then noise from the ammonia plant would have been detected and reported to site management.

A leaking solenoid at the ammonia plant has the potential to cause offsite noise pollution. An initial investigation report from the operator provided the following information;

"Noise originated from site due to a failed solenoid valve on the Ammonia Plant. The valve was replaced on Sunday 8th which rectified the problem. The current Planned Preventative Maintenance schedule which

includes checks of the valve is monthly. To prevent this from happening again the frequency of checks will double, with a bi-monthly check now taking place."

On this occasion the noise levels were not verified by an NRW officer and no score has been applied for noise.

It should be noted however, that no notification was received from the operator regarding the incident until the 9th October 2023. This is a contravention against permit condition 4.3. A **category 3 score** has been applied under subheading IR4B – Reporting.

Noise Complaint 18th November 2023

On the 18th November 2023, Natural Resources Wales received a noise complaint concerning Maelor Foods Ltd.

A schedule 5 notification was received from the operator on the 20th November 2023 which provided the initial findings as follows;

"Engineering Department investigated upon receipt of the complaint and found that fans above offal bays had not been turned off when processing stopped at approximately 15:30 pm. The fans were then turned off via the control panel.

All vehicle and pedestrian doors to the offal bay and the mezzanine floor above the offal bays were closed.

We are investigating the reason for the fans not being turned off. The Team in question will be back on shift on Saturday 25th November and I will update further on Monday 27th November once investigation has concluded."

Results of the investigation were received on the 29th November 2023 and showed that that engineer responsible for shutdown on the 18th November 2023 had forgotten to complete the shutdown checks.

Actions

1. The operator is advised to perform an internal review, to see whether there are issues around the completion of the shutdown check form.
2. If issues with completion are noted during the above audit, relevant management procedures should be updated and staff training provided to ensure that the checks are being completed.

This information shows that there has been a management failure regarding the shutdown procedure. Non-compliances against permit condition 1.1.1 are discussed at the end of this CAR form.

Effluent Treatment Issues 6th to 14th November 2023

The following provides a timeline of events and associated observations and permit breaches surrounding the effluent treatment issues between 6 and 14 November 2023.

Thursday 9 November 2023

NRW received notification by way of a phone call from the health safety and environment manager at Maelor Foods Ltd that the site has experienced some technical difficulties with the treatment of effluent and was asking for authorisation to use a new raw effluent tank at the site which is not yet permitted. An email clarifying the site's position was received at around 17:45 which stated the following;

"As discussed, due to a combination of high water usage (due to an issue with our module pre-wash unit), and the DAF going in to auto-pause we have high tank levels on both the balance and the divert tanks.

This means that we may need to divert raw effluent into the emergency pits at some point this evening. I will notify you further if this takes place.

Schedule 5 notification for water usage to follow first thing tomorrow morning."

A further update was received at around 21:15 which provided the following information;

"By way of update we have now diverted in to the open pits and are likely to divert in to the third tank before the end of tonight. I will update again if this happens"

Friday 10 November 2023

NRW officers Phil Harper and Rebecca Harwood met the site health safety and environment manager via teams at 10:30 to provide an update for the situation at the site. During the meeting it was found that raw effluent had been diverted to the third unpermitted tank during the evening of the 9th November 2023.

Following the teams meeting Natural Resources Wales sent the following steps to Maelor to start rectifying the issue.

"Thanks for your time this morning. From our discussion I am concerned that there is currently no tank contingency at the site, in line with the operating procedures for the site. This leaves the site in a vulnerable position in the event of a large spill such as blood spill or a further failure of the ETP

The following steps should be carried out without delay.

- *Tankers should be ordered to reduce/ empty the divert tank to give capacity for contingency, and update should be sent when this work commences.*
- *Tankers should be ordered to empty the third tank which is not permitted for use, or this should be diverted back to the main tanks asap ensuring there is the contingency capacity requirements as above.*
- *Until the situation is resolved and tanks are at a normal operating volume, please send tank volumes at the start and end of each shift.*

This incident will need to be investigated further by NRW. In order for the investigation to be conducted additional information is required, I understand that you are going on leave from Friday, therefore I would be happy to receive the items below by COB Friday the 17th November.

- *Operating procedures linked to the operation of the tank levels*
- *Shift handover reports for ETP operatives*
- *A photograph of the pipework from the balance tank to tank 3 and the pipe blanking.*

In addition, a thorough investigation report detailing the events which led to the current capacity situation, including any actions to avoid a recurrence should be submitted to NRW by COB Friday 1st December 2023."

In response, the following email was sent to NRW from the operator on the 10th November 2023.

*"Please be assured that there **IS** a site contingency in case of the improbable event where the blood tank miraculously splits within the confines of its own room.*

The blood tank is emptied on a Daily basis and has a maximum of 14,000kg of blood in, this would equate to 1% of the balance/divert tank capacity. It currently has 7,000kg in it.

Balance tank level is currently at 92%.

Divert tank is currently at 85%.

The Emergency tank is at 20% with valves closed.

We are using 43% of the open pits.

The Team felt that it is better to use the brand new Emergency tank instead of the open pits when this issue arose overnight. In response to your email below, we have immediately started draining the contents of the Emergency tank into the open pits.

Also, you have ordered tankers to be arranged immediately to take off raw effluent offsite. However, this is impossible to do as we cannot get any Waste Processing Company to take this code away as there is no outlet for it.

If we get to the point where all tanks and open pits are full (leaving a 1% leeway for the blood contingency) we will then cease operations onsite."

Based on the response, Natural Resources Wales was satisfied that controls would be put into place for the operator to monitor the situation to avoid the spillage of raw effluent.

Balance and Divert tank levels were submitted to NRW at the start and end of each shift from the 10th November 2023 until Tuesday the 14th November 2023. A maximal level of 97 % capacity and 100 % capacity in the balance and divert tanks respectively was reported to NRW at 17:47 on the 10th November 2023. The maximum volume in the divert tank was reported as 103% at 6 am on the 11th November, The balance and divert tanks are provided with 10 % freeboard capacity and no spill occurred.

13 November 2023

At 13:00 NRW officers Phil Harper and Carter Shone carried out an unannounced inspection at Maelor Foods Ltd in response to the above report. At the time of the inspection the balance tank and divert tanks were at 49 % and 2 % of their total capacity. Approximately 60 m³ of untreated effluent was present within the open emergency pits.

Some minor effluent spillages were noted adjacent to the open emergency pits and at pipework between the balance and divert tanks. The site was in the process of cleaning up the spillages emptying the emergency pits at the time of the visit. No offsite odours were noted.

14 November 2023

Tank levels were considered to be a normal operating level.

Observations and permit non-compliances.

A new tank has recently been installed at the effluent treatment plant. During the incident open connection points for pipework were sealed using metal flange plates. A permit variation application is currently being determined by Natural Resources Wales, which may permit the use of the new tank. The permitting process allows for the construction and controls around the tanks use to be assessed by Natural Resources Wales. The use of an unpermitted tank is in contravention of the sites operating techniques which have been approved by the permitting process. Operating techniques which have been provided during the application from part of the permit under Schedule 1, table 1.2. Permit condition **2.3.1(a)** states "*The activities shall, subject to the conditions of the permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table 1.2, unless otherwise agreed in writing by Natural Resources Wales*". A **category 3 score** has been applied under heading IR2C – Operating Techniques.

This situation unfolded over time a period of 48 - 72 hours giving the operator ample time to take steps to

reduce influent to the effluent treatment plant and is of the view that capacity should have been maintained as detailed in the operating techniques.

"We will be able to divert potentially damaging wastewater such as large blood spillages to a diversion tank with the same capacity as the balance tank."

Operating techniques which have been provided during the application from part of the permit under Schedule 1, table 1.2. Permit condition **2.3.1(a)** states *"The activities shall, subject to the conditions of the permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table 1.2, unless otherwise agreed in writing by Natural Resources Wales"*. A **category 3 score** has been applied under heading IR2C – Operating Techniques. **Please note that this score has been consolidated with a previous score under IR2C to give a single non-compliance score.**

A notification was not received from site to inform that the non-permitted tank had been used. This is a contravention against permit condition 4.3. A **category 3 score** has been applied under subheading IR4B – Reporting. **Please note, this score has been consolidated with previous scores against 4.3 under subheading IR4B.**

Audit of Site Perimeter Checks 28th November 2023.

At 13:00 on the 28th November 2023 Phil Harper, Senior Industry & Waste Regulation Officer and Jim McClymont, Industry & Waste Regulation Team Leader visited Maelor Foods Ltd.

The purpose of the visit was to audit daily environmental checks against the operator's environmental management system. This follows inconsistencies that were noted during a review of completed Daily Environmental Check Sheets for the period the 1st to the 10th October 2023.

The Daily Environmental Check sheet documents perimeter checks for noise and odour at 6 locations at the site. Prior to the visit further Check Sheets were requested for the following dates.

-24th and 25th September 2023, planned plant shutdown.

-7th to the 14th November 2023, where a known issue had occurred at the sites effluent treatment plant, resulting in the flooding of open emergency pits with raw effluent.

Daily check sheets were provided by the operator and have been attached to this compliance assessment report for information.

Site Inspection

A site inspection as undertaken as part of the audit. At the time of the inspection the site was operational. Overall, the site was in a clean and tidy condition.

The effluent treatment plant was operating within normal parameters and open emergency pits at were empty and visually clean. In addition, no spills were evident around the effluent treatment plant. Some mud was observed on the road around the effluent treatment plant, this is due to construction work which is ongoing to improve containment and was not considered to be causing pollution.

Localised odour was noted around the effluent treatment plant and near the lairage and offal bays, this is typical for the site. No offsite odours were noted prior to or following the visit.

During the inspection NRW officers noted that the lairage door was opened. The door remained open for approximately 10 minutes whilst the arriving trailer was unhitched, and a site tractor unit was hitched up. The site's odour management plan specifies that doors should be closed on the lairage and offal building when not in use for vehicle movements. NRW is of the opinion that the lairage doors were opened too early compared to the entry of the vehicle. Permit condition 3.3.3.(b) states that "the operator shall implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales". A **category 3 score** has been applied under heading IR3C – Odour.

No other compliance issues were noted during the site inspection.

Audit of Environmental Perimeter Checks.

A review of the Daily Environmental Check Sheets was undertaken against sites environmental management procedures.

The operational odour management plan for the site provides the following information with regard to operator self-monitoring for odour;

“Regular sniff testing is carried out in accordance with our Odour Sniff Survey Procedure to identify any off-site odours and assess odour strength in ambient air. This is based on a “slow” walk around the boundary of the premises (and not restricted to the process boundaries) and includes two assessments at pre-determined locations around the site boundary as marked at locations 1 and 2 on the map on the back of the Sniff Survey Record form in Appendix 2.

These assessments are to be carried out daily at different times of day for the first six months of plant operations, and then, if boundary odours are not experienced frequently the sniffing will be carried out on a weekly basis and as required in the event of an odour related complaint, as described above.

If odours are detected at any other point the assessor must stop and assess the intensity and persistence of the odour and make observations using the form in Appendix 2. The locations of any odours are to be marked on the map and cross-referred on the recording form.

Sniff tests are carried out by suitable person(s) with experience of the different types of odours generated in the various areas of the plant (e.g. lairage/chickens, de-feather, offal, effluent, sludge, blood tanks etc.), but it is very important the assessor does not work in any areas of the plant where they are routinely exposed to odours which would adversely affect their sensitivity to these odours. Odour is subjectively assessed using the following criteria:

Nature of odour		Odour severity		Extent & persistence	
0	No odour detected	0	No Odour Present - no odour perceived	1	Local and transient, not detected off site
1	lairage/chickens	1	Very Weak - probable some doubt whether odour present	2	Transient, detected off site for brief periods
2	Defeather/scalding	2	Weak - odour character is barely	3	Persistent

			recognisable		but localised
3	Offal	3	Distinct - odour character is recognisable	4	Persistent and pervasive, detected over a narrow range
4	Effluent	4	Obvious - odour character is easily recognisable	5	Persistent and pervasive, detected over a wider range
5	Sludge	5	Strong - odour may be offensive if persistent		
6	Blood tanks	6	Very Strong - odour is offensive, exposure to this level considered undesirable		
7	Other (Describe)	7	Extremely Strong - odour is offensive, instinctive reaction to avoid further exposure		

The following information is also recorded when carrying out odour sniff monitoring:

- Any abnormal process conditions
- Any faults or overdue maintenance on odour abatement equipment
- Ambient temperature
- Information on any other odour generating activity taking place upwind of the plant
- Description of smell
- Time/duration of test
- Odour source (if apparent)

The results of sniff survey are recorded on the form in Appendix 2.

Odour monitoring results are regularly reviewed (initially monthly, and then quarterly after the first year of operation) to evaluate the effectiveness of the odour abatement measures in use at the plant, identify circumstances that cause increased odour emissions that may require additional odour abatement or mitigation measures and identify new techniques that could be effective in further reducing odour from the plant going forward.

This information is also used to review this Odour Management Plan and its effectiveness. It is envisaged that

the odour abatement techniques described in this OMP will be effective at reducing the odorous emissions from the plant to an acceptable level and that the instances in which excess odour from the plant causes complaints from neighbours will be very infrequent."

In addition to odour sniff surveying the form also requires for noises to be recorded at each monitoring location, for the main scrubber and cyclones to be checked and for general site management and odour criteria to be checked. There is also a section for the operator to insert any comments.

A review of the Daily Environmental Check sheets for the selected period revealed the site has been undertaking perimeter odour checks on a daily basis, which is in agreement with the odour management plan.

Irregularities have been noted within the daily check forms with the following errors summarised below;

-Wind direction and wind strength are not often reported on the form.

-In more than one instance it was found that the same time was recorded for all locations, it has later been confirmed that security guards who are responsible for undertaking the audit had been found not to have left the security lodge on these days.

-In many cases, despite the site being aware that localised odours are present in some locations of the site, such as the effluent treatment plant, the form entry shows no odour.

These mistakes or omissions bring into question the validity of the data and their value following reports of noise or odour from the site.

NRW is of the understanding that since an initial review of forms after the report of noise on the 8th October 2023, that monitoring staff now report to a different manager at the site and the training has been provided to the security guards who undertake the daily checks. A training record was shown to NRW officers at the security lodge, showing that security guards had received training.

The training was provided to security staff prior to a later incident at the site which occurred in between the 7th and 14th of October 2023, in which open effluent pits were used to contain raw effluent. This incident has been discussed within this compliance assessment report. A review of the Daily Environmental Check Sheets found that during the abnormal events at the site, the frequency of Daily Environmental Checks had been increased. However, data omissions around wind direction and around the recording of odours were still prevalent. From a sample of 28 completed Daily Check Sheets only one provided showed a localised odour around the effluent treatment plant, again challenging the validity of the data.

On further investigation during the audit, it was found that there are no standard operating procedures at the site which instruct operators on how to undertake the Daily Environmental Check, an activity which NRW views as critical to mitigating local amenity effects from the site. It also appears that there has been no independent review of completed Daily Environmental Check Sheets by managerial staff to ensure that the forms have been completed correctly and that any corrective actions have completed, this is contrary to the control measures set out by the Operational Odour Management Plan.

During the audit NRW officers enquired whether there were procedures on the site which described what actions are taken if odour is detected at the site perimeter and how this is escalated. It was found there are no documented procedures for escalating findings of the daily environmental check to management to address issues.

Audit Summary

In summary, the operational odour management plan for the site describes that daily checks will be undertaken and provides a report form. However, the operator lacks robust management procedures which instruct operators how Daily Environmental Checks are undertaken and how the resulting data is used.

Non-Compliances arising from the Sites Environmental Management System

Various failures to follow site procedures have been identified within this compliance assessment report. These will be discussed in turn below.

Daily Environmental Checks

The findings of the report show that there is a lack of documentation to ensure that the data collected during daily environmental checks is robust and is internally reviewed by management for action.

A **category 3 score** has been applied against permit condition **1.1.1** under C2 – Management System and Operating Procedures.

Completion of Shutdown Checks

Failure to complete the shutdown checks on the 18th November 2023. This caused offal bay fans to be left on after production had stopped resulting in a noise complaint.

A **category 3 score** has been applied against permit condition **1.1.1** under C2 – Management System and Operating Procedures.

Incident and Non-Conformance Procedure

The site's Incident and Non-Conformance Reporting procedure clearly defines the steps that are to be taken by the operator in the event of an incident at the site. Making reference to the failure to report the solenoid failure at the ammonia plant on the 7th October 2023 and the failure to report the use of the non-permitted effluent tank to contain raw effluent on the 9th November 2023, the operator failed satisfy section 8 of the procedure which states the following;

“Senior Management must notify and submit a report to NRW for specified non-routine events including:

- *substantiated environmental complaints attributed to the site;*
- *non-conformances with licence conditions or limits;*
- *any incidents which have or could lead to significant environmental damage.*

This notification must be made immediately and be followed up with a written notification report (Schedule 5 Part A) within 24 hours. The summary of the investigations must also be submitted once complete. Information must be supplied on a version of the form in Schedule 5 of the installation permit.

If an incident occurs which at the time does not carry a risk to the environment, but has potential to, then a call is to be made to the regulator to notify them of the potential risk. This will then enable the regulator to deal with any complaints at the time rather than have to investigate the complaint.”

Failure to notify NRW that these incidents had occurred is a contravention of permit condition 1.1.1 (a) **“The operator shall manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints.”**

A **category 3 score** has been applied under subheading IR1A- General management.

Odour Management Plan

The failure to ensure that doors remain closed except for vehicle movements is a failure by the site to follow

the odour management plan.

A **category 3 score** has been applied against permit condition **1.1.1** under C2 – Management System and Operating Procedures.

Effluent Contingency

The incident between the 7th and 14th November 2023 have shown that procedures around ensuring that there is contingency for effluent in the event that the site ETP experiences a fault don't exist, are not robust or are not being followed.

A **category 3 score** has been applied against permit condition **1.1.1** under C2 – Management System and Operating Procedures.

Actions:

3. Produce standard operating procedures for undertaking Daily Environmental Checks and provide training to relevant staff by the **12th January 2024**.
4. Produce a management procedure which describes the escalation process and actions to be undertaken if odour is detected at the site perimeter by the **12th January 2024**.
5. Ensure that relevant staff are aware of the control measures set out by the operational odour management plan with regard to vehicle movements and provide training by the **12th January 2024**.
6. The operator is advised to update the Daily Check Sheet to make to include confirmation that any actions provided by the Daily Check Sheet have been completed.
7. Report all future incidents in line with permit and site procedures.
8. Produce management procedures which describe the management of effluent at the site, in particular, the actions that will be taken by the site where there is reduced capacity in the balancing and divert tanks by the **31st January 2024**.

Kind Regards

Phil Harper

Senior Industry and Waste Regulation Officer NE

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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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.