

Compliance Assessment Report CAR_NRW0043063

Permit being assessed: AB3492ZQ.

For: Wrexham Mill, **held by:** Lloyds Animal Feeds (Western) Ltd

At: Bridge Rd North, Wrexham Ind Est, Wrexham, Wrexham CBC, LL13 3PS.

Type of assessment: Site Inspection,

Reason: Routine.

On: 19/12/2023 between 09:55 and 11:15.

Parts of permit assessed: See report.

NRW Lead Officer: Kathryn Bradshaw, accompanied by Rebecca Harwood.

Report sent to: Paul Jones, Group Lead Operations Manager, on 08/01/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2B - Operations - The site	Action only (X)	
IR2B - Operations - The site	Action only (X)	
IR1A - Management - General management	Assessed (A)	
IR2B - Operations - The site	Assessed (A)	
IR2E - Operations - Improvement programme	Assessed (A)	
IR2A - Operations - Permitted activities	Assessed (A)	
IR3C - Emissions and monitoring - Odour	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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
IR2B	Update NRW when plans have been drawn up for the new vehicle wash area.	28/06/2024

Criteria	Action needed	Complete by
IR2B	Provide a copy of the updated site drainage plan to NRW	28/03/2024

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.

At this time, we do not intend to take any further action.

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

This was a pre-arranged inspection, primarily as a familiarisation visit of the facility to the new regulating officer for the site, Kathryn Bradshaw and accompanied by Rebecca Harwood the previous regulating officer.

We were met on site by the Group Lead Operations Manager and the Quality Compliance Manager. A brief overview of the site operations was provided, and the function of each job role was explained within the business. We were then taken on a detailed tour of the site.

The vehicle wash down area was viewed and although the waste water drains to an interceptor and eventually to the foul sewer, the area is surrounded by unmade ground and there is no kerbing of the area. As raised previously there is the potential for vehicle wash run off to enter the unmade ground. The site advised they are planning to extend this area and ensure it is contained. No timescales were provided at the time of the visit.

Action

Update NRW when plans have been drawn up for the new vehicle wash area.

Discussions with the site were held about their trade effluent consent with DCWW, they explained they have a formal agreement to be able to discharge a certain volume to foul sewer but do not have to monitor any emissions from this.

We viewed the bulk liquid storage tanks and although the area is bunded the off take pipes remain located outside of the bund. There were measures in place to contain any small drips or leaks when delivery occurs but currently there would be no containment if a larger spill were to occur when liquids were being delivered. The site's accident management plan was provided after the site visit which details the emergency procedures if a spill were to occur.

IBC liquids were stored within purpose built containers that are bunded. New concreting has been completed on the yard which was noted in the previous inspection (CAR-NRW0041556).

The new intake mill has been completed and new drainage has been installed in this area, an updated site drainage plan was requested during the visit and this will be forwarded once completed. This area adjacent to the new intake was untidy with numerous pieces of

old equipment being stored. The Operator confirmed that there is a plan for this area to be cleared as soon as staff are available.

Action

Provide a copy of the new site drainage plan to NRW.

An odour could be detected on site at the time of the visit and was linked to the facility. No odour was detected outside of the site boundary and to date no odour complaints had been received about the facility.

Annual Monitoring

The annual monitoring reports were received on 1st December 2023 for discharges from emission points A1, A2 and A3 in compliance with permit condition 4.2.3

All reported parameters were in compliance with the Emission Limit Values (ELV's) detailed in Permit Condition 3.3.1, Schedule 3(b) , Table S3.1.

Improvement Conditions

IC1, IC2 & IC3

Responses to these were received on 23/05/23 and are currently being reviewed.

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.