

Compliance Assessment Report

Report ID:
CAR_NRW0035080

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

Site	Dolwen Abattoir EPR/GP3235GH		Permit Ref	GP3235GH	
Operator/Permit holder	Randall Parker Foods				
Regime	Installations				
Date of assessment	05/02/2019 - 06/02/2019	Time in	23:00	Out	12:00
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Noise and management				
Lead officer's name	Frost, Julia				
Accompanied by	Oakes, Ian				
Recipient's name/position	Gareth Gower/ Technical Manager	Date issued	24/05/2019		

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
C2 - General Management - Management system and operating procedures	C3	1.1.1

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	1	Total compliance score (see section 5 for scoring scheme)	4
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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

This CAR form includes a summary of the monitoring data from recent NRW monitoring exercises as well as an assessment of the information provided by the Operator in response to requests from NRW.

1. NRW Monitoring Exercises



1.1

On 30th and 31st Oct 2018 NRW carried out a noise monitoring exercise.

The weather conditions were dry, still and very cold for the night time measurements, dry and bright with a light breeze for the day time measurements.

The Operator has confirmed that operations on site were normal at the time of the monitoring.

Monitoring Results

	Date	Time	Laeq	LA90	Lamax
Proxy	30/10/2018	22:33:00 - 22:49	42	32	59
Proxy	31/10/2018	05:51 - 06:06	47	39	72
Proxy	31/10/2018	11:20 - 11:35	51	43	57
A	30/10/2018	23:00 - 23:15	45	44	82
A	31/10/2018	06:14 - 06:30	58	45	77
A	31/10/2018	11:42 - 11:57	54	45	57
B	30/10/2018	23:18 - 23:33	45	44	57
B	31/10/2018	06:33 - 06:48	48	46	63
B	31/10/2018	12:01 - 12:16	52	50	75

Due to an issue with the software NRW were unable to remove the peaks caused by external influences following this monitoring exercise, for example traffic noise. The levels recorded therefore include these peaks and the actual impact from site operations was lower.

Proxy

These were taken from down the farm track by the bungalow in front of site, near to some bales.

P1. Monitoring was carried out between 22:33 and 22:49 on 30 Oct 2018.

Road noise was the biggest influence at this location during this time with intermittent fan noise observed. When there was no noise from the road the instantaneous reading was 30 / 31 dB.

P2. Monitoring was carried out between 05:51 and 06:06 on 31 Oct 2018.

There was a lot of traffic on the main road, which was the biggest influence at this location during this time.

P3. Monitoring was carried out between 11:20 and 11:35 on 31 Oct 2018.

Road and aeroplane noise were the main impacts on this set of measurements. Readings of 36 / 37 dB were recorded when there was no influence from traffic on the road.

Location A

A1. Monitoring was carried out between 23:00 and 23:15 on 30 Oct 2018.

A constant fan noise could be heard during this time. The sound level was fairly constant at 44 dB.

A2. Monitoring was carried out between 06:14 and 06:30 on 31 October 2018.

A constant fan noise could be heard during this time. Occasional impact as a result of an air release, bangs and clangs and fork lift truck activity on site.

Impact from external road noise (main and local roads) was observed at this time, the peak results obtained were as a result of these.

A3. Monitoring was carried out between 11:42 and 11:57 on 31 October 2018.

Constant fan noise was heard during this monitoring exercise. With occasional impacts observed as a result of an air release, clatters, bangs, fork lift truck movements.

Impact from external road noise (main and local roads) was observed at this time, the peak results obtained were as a result of these.

Location B

B1. Monitoring was carried out between 23:18 and 23:33 on 30 Oct 2018.

A constant fan noise was observed which appeared to be coming from two sources on site.

B2. Monitoring was carried out between 06:33 and 06:48 on 31 October 2018.

A constant fan noise was heard with intermittent impact from air release and clatters on site. The sound level was around 44 / 45 dB when there were no external influences impacting on the readings.

B3. Monitoring was carried out between 12:01 and 12:16 on 31 October 2018.

A constant fan noise was heard with occasional bangs, clangs and shunting of vehicles on site impacting on the measurements. The sound level was a fairly constant 50 dB when there were no external influences. On one occasion the instantaneous reading was 75 dB as a result of something being dropped on site.

On 5th and 6th Feb 2019 NRW carried out a noise monitoring exercise.

The weather conditions were dry and clear, with a light breeze.

The Operator has confirmed that operations on site were normal at the time of the monitoring.

Monitoring Results

	Date	Time	Laeq	LA90	Lamax
Proxy	05/02/2019	23:10 - 23:41	43	35	60
A	05/02/2019	23:52 - 00:23	45	40	65
A	06/02/2019	10:36 - 11:06	54	43	81
B	05/02/2019	23:56 - 00:27	47	44	62
B	06/02/2019	11:09 - 11:40	47	44	56

Proxy

These were taken from down the farm track by the bungalow in front of site, near to some bales.

P4. Monitoring was carried out between 23:10 and 23:41 on 5 Feb 2019.

Noise from the river could be heard at times. Road noise was the biggest influence at this location during this time. When there was no noise from the road the instantaneous reading was 33 / 34 dB. The instantaneous readings increased to around 56 dB due to traffic noise.

Location A

A4. Monitoring was carried out between 23:52 (5 Feb 2019) and 00:23 (6 Feb 2019)

It should be noted that this monitoring was carried out by Powys CC whilst NRW monitored at Location B.

A5. Monitoring was carried out between 10:30 and 11:06 on 6 Feb 2019.

The instantaneous readings were around 45/46 dB when there were no external influences. A constant fan noise could be heard during the monitoring. Occasional loud talking on site could be heard at this location during the monitoring. The occasional clatter could be heard from fork lift truck movement on site.

There were a number of external sources impacting on the measurements during this time - including vehicles on the main road, vehicles passing us on the local roads, activities on the farm - the peaks associated with these activities have been removed from the data.

Location B

B4. Monitoring was carried out between 23:56 (5 Feb 2019) and 00:27 (6 Feb 2019).

At 23:49, from location A, we observed a lorry turn off the main road and toot its horn to another vehicle and then drive very quickly to site. This lorry then went onto site and collected a skip of waste / animal byproduct and left an empty skip. This involved the shunting of the skips which could be heard at location B. A banging noise could also be heard from the vicinity of the lorry before it left the "waste area".

A constant fan whirring noise was observed during the monitoring. The readings were 45 / 46 dB when there were no external influences impacting the results.

B5. Monitoring was carried out between 11:09 and 11:40 on 6 Feb 2019.

Noise from the main road could be heard during this monitoring. The occasional clatter could be heard from fork lift truck movement on site.

There were a number of external sources impacting on the measurements during this time - including aeroplane noise, bird noise, local road noise and bird scarer on the farm - the peaks associated with these activities have been removed from the data.

2. Recent submission to NRW

2.1

Noise Impact Assessment, Acoustic Consultants

Acoustic Consultants Ltd carried out an assessment on behalf of the Operator. Report 7072/BL/SRP March 2018, includes details of the monitoring carried out. Each piece of equipment was monitored in turn and those highlighted with the greatest potential for off site noise were given recommendations to reduce the offsite impact.

The report highlighted that, from the monitoring and observations, the chillers / condensers, trailer park, air compressors, ice plant / skin sucker / head and hoof sucker and the gut and paunch room had the potential to impact on off site noise.

A number of improvements were carried out in 2018, which are documented in the BAT review discussed below. The most significant of these is the installation of an acoustic barrier around the chillers and the relocation of the air compressor and installation of a silencer on the vent.

A repeat monitoring exercise was carried out by Acoustic Consultants in October 2018, which is reported in document 7446/BL/SRP, November 2018.

The conclusion of the report was that *"the noise survey results and subjective assessments indicate the overall noise level and character from the mitigated plant has been reduced."*

The recordings of individual pieces of kit had in places increased. This was reported to be as a result of site throughput being higher during the October monitoring.

The report goes on to state that whilst a reduction has been achieved it is recommended that the improvements highlighted in the initial report that have not been completed, be completed, namely the enclosure for the skin sucker and barrier to the trailer area.

The skin sucker enclosure has since been installed and further improvements are planned to it over the next month.

2.2

Noise BAT review P141-R002-F1

This report has been produced by Engreen Environmental Consultants Ltd on behalf of the Operator. It includes a summary of the improvements made on site over recent years with respect to impact on off site noise, and a BAT (Best Available Techniques) assessment.

The improvements on site have been a combination of managerial and physical changes.

The site has an environmental management system which contains a number of procedures relating to the potential impact of site activities in relation to off site noise. There is a planned preventative maintenance system which includes all key equipment which could impact on off site noise. Training of staff is carried out highlighting the importance of individuals carrying out their role in a manner that will minimise the off site impact. A noise management plan has been produced and is regularly reviewed. Letters have previously been sent to hauliers and farmers highlighting the potential off site impact. A list of site rules is given to all drivers when they enter site.

The main improvements to fixed plant on site have been the screening of the chillers down the side of the factory and the relocation of the compressor and installation of a silencer on the vent.

The report concludes that the site meets indicative BAT as set out in the relevant guidance.

The recommendations of the report are that the Operator continues to: implement the Noise Management Plan and that it is reviewed every 6 months; continues with the preventative maintenance system; when plant is replaced the Operator should assess the potential impact on off site noise before deciding on the replacement; review shielding options for individual plant and the site overall.

2.3

Noise Management Plan (NMP)

This document is part of the site's environmental management system, the version reviewed was issue number 5,

dated 12 March 2019.

The NMP identifies the sensitive off site receptors and assesses the on site activities which have a potential to impact on off site noise.

The NMP was discussed with the Operator at a meeting on 3 April 2019 and a number of recommendations made including

- clarification on review frequency of the NMP
- the impact of tonal and impulsive noise should also be considered
- review of the potential off site impact assigned in the NMP as some do not correlate to NRW observations
- details of how the various control / mitigation measures will be enforced should be included in the NMP
- consider re-evaluating the off site impact once the control / mitigation measure is in place
- daily monitoring should be recorded including any sound levels, taken these checks should be done at different times during the day and night
- hauliers / farmers coming to site should be written to regularly in relation to the potential of their activities on off site noise and permit compliance
- include the fact that when a refrigeration trailer is required to have a "boost" on diesel it is parked away from the sensitive receptor and that these occasions are documented and details of why the "boost" is required.

The Operator was asked to review the NMP taking into account these points and resubmit to NRW by 10 May 2019.

An updated NMP (issue number 6, 9 May 2019), has been provided to NRW which has addressed some but not all of the points above. The NMP should be further reviewed to ensure that all of these points have been considered and resubmitted to NRW for approval by **15 June 2019**.

3.

Permit Conditions

The permit includes a number of conditions relevant to the noise management.

Permit condition 3.5.1 requires that

Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration

Permit condition 3.5.2 requires that

The operator shall:

- a) if notified by Natural Resources Wales that the activities are giving rise to pollution outside of the site due to noise and vibration, submit to Natural Resources Wales for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;*
- b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.*

Permit condition 1.1.1 requires that

The operator shall manage and operate the activities:

- a) 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; and*
- b) using sufficient competent persons and resources.*

4.

Slaughterhouse BREF

The Slaughterhouse BREF (BAT reference document) highlights the following areas as potential sources of noise and vibration: unloading and marshalling of animals; vehicle movements; compressors; air conditions and ventilation fans.

During NRW inspections and monitoring exercises vehicle movements; compressors, refrigeration trailers and chiller units have been observed to be the potential source of off site noise, as well as bangs and clangs from operatives carrying out their duties. These are largely in line with the sources highlighted in the BREF note.

Vehicle Movements

The site has recently reduced the speed limit to 8 mph (from 10). The speed bumps on site were removed a few years ago as they were highlighted as a source of off site noise.

The site's planning permission allows vehicle to arrive at site 24 hours a day. For animal health issues, as well as reducing the impact with respect to odour from the movement of waste vehicles, some deliveries are made outside of normal working hours.

As noted in the observations from NRW monitoring exercise in February 2019, the movement of vehicles destined for RPF, both on and off site, do impact on sound levels at the off site receptor. NRW have no jurisdiction with respect to vehicle movements off site, however the Operator has committed to contact all hauliers and farmers attending site to reiterate the potential impact on permit compliance and now hands out a list of site rules on entry to site.

It is essential that the Operator ensures that they have adequate procedures and training in place relating to vehicle movements and the potential impact off site, in line with permit condition 1.1.1, to ensure this is complied with. The Operator should regularly audit and enforce these procedures to ensure that the impact from vehicle movements on off site noise is minimised.

Refrigeration Trailers

The BREF document states that refrigerated vehicles can lead to noise problems when powered from the vehicle. It goes on to state that many slaughterhouses provide power cables to power the refrigeration units, thereby reducing the noise levels.

This is the case at Dolwen where there are a number of electric hook up points on site. All trailers are plugged into electric when in use on site. The exception to this is when a "boost" is required prior to loading (for a maximum of two hours). When this is required the trailer is parked in a specific area on site, away from the sensitive receptor.

The operator has advised that this is infrequent, is only done on 1 trailer at a time, and has confirmed that they will ensure that this is documented when it is required.

The operator also has a procedure in place to deal with trailers when they arrive on site that are observed to be "noisy" when they are hooked up to the electrics. This is reported to the haulier and the trailer is not allowed back on to site until the issue has been fixed.

This activity is considered BAT and is therefore compliant with permit condition 3.5.1.

Chiller Units

The fixed chiller units down the side of the factory were cladded with an acoustic barrier in late summer 2018.

This is considered BAT and is therefore compliant with permit condition 3.5.1.

Bangs and Clangs

Observations during recent NRW monitoring exercises, have highlighted issues with bangs and clangs associated with site activities, primarily in day time hours, impacting on the sound levels off site.

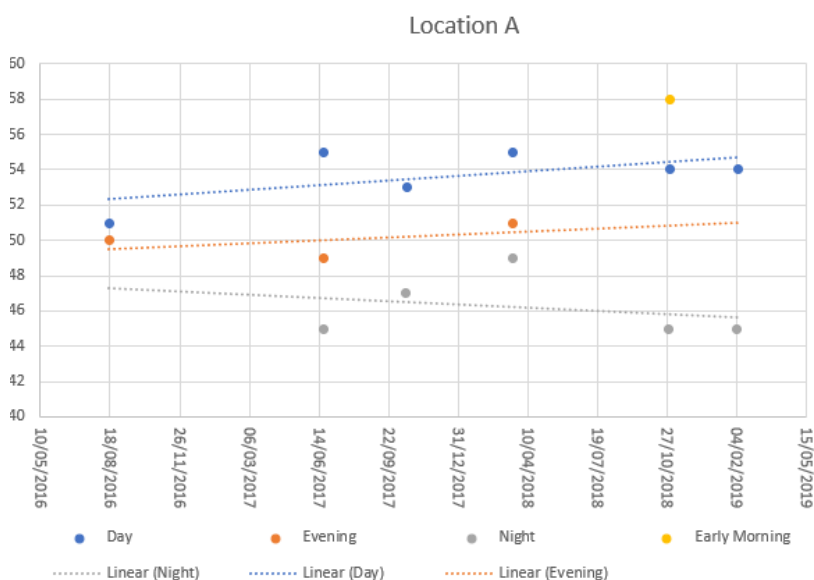
5.

Review of NRW Monitoring

NRW have carried out a number of noise monitoring exercises over the last few years. Monitoring has taken place at different times of the day and night to gather a snap shot of the noise levels off site.

The graphs below compare the data gathered (in dB) at location A and B during these exercises. The results have

been grouped so that results from the same time of day are compared.

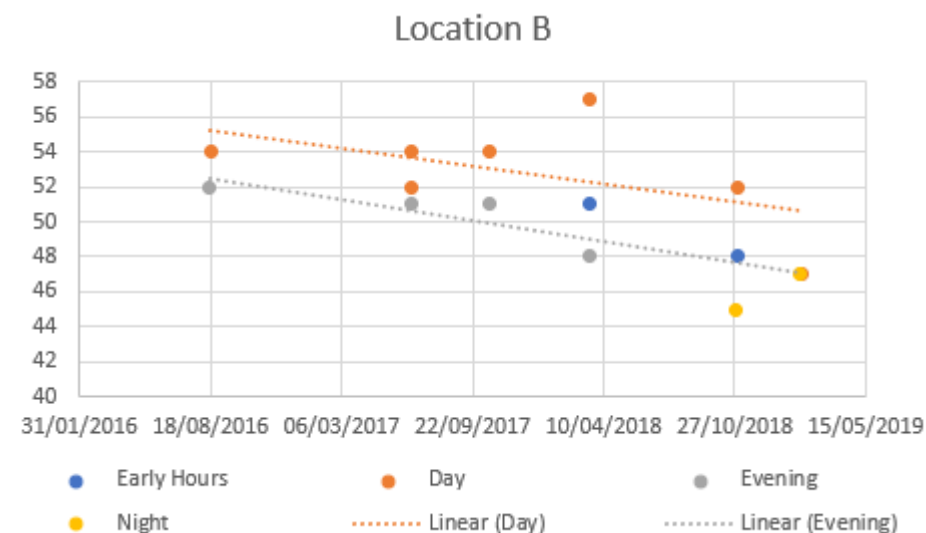


The results of the monitoring at this location have been relatively consistent over the different NRW exercises. Our observations during monitoring at this location indicated that the biggest influence from activities at the abattoir were related to the trailer park. No changes have been made to the trailer park during this time period.

Night time and evening noise is lower than levels recorded in the daytime.

As discussed above, running refrigeration trailers on electricity is considered BAT.

The early morning result from 31 October 2018 is believed to have been influenced by vehicle noise from the main and local roads, and has been treated as an anomaly.



The results of the monitoring at this location have shown a downward trend since 2016, with night time and evening results lower than those in the day. The early hours monitoring was carried out at around 6am, which is classified as night time noise. Activities on site had commenced prior to this time whereas for the evening monitoring no activities (other than deliveries) were being carried out.

An important observation during the most recent monitoring exercise is that noise from the main road was observed at location B, when the site was operational. Prior to the improvements to noise abatement on site noise from the

main road was not detectable at this location.

6.

Conclusions

NRW have carried out a number of monitoring exercises over recent years. The results of which show that the off site sound levels recorded at location B have decreased since the improvements have been put in place. The biggest influence in off site noise at location A is as a result of refrigeration trailer noise, as a result the recorded sound levels have remained fairly consistent here.

Fixed Plant

NRW is satisfied that, with the improvements recently carried out, the operator is now using appropriate measures with respect to the fixed plant and the refrigeration trailers on site.

However, there remains a potential impact on off site noise from these activities if they are not managed in line with permit condition 1.1.1 and 3.5.2. The operator must therefore ensure that they manage the operations in line with the EMS procedures, ensuring adequate maintenance and resources, as well as ensuring that they regularly audit and enforce compliance with the procedures.

NRW will audit site activities over the next few months and review the operator's data to ensure that this is happening.

Day to Day Management

With the implementation of robust procedures and NMP, site operations can be operated in a manner that minimises the off site impact with respect to noise. In order for day to day operations to be carried out in a manner that consistently minimises the off site impact, the Operator must ensure that relevant staff are trained, aware of their potential to impact on permit compliance and follow the EMS documents.

During the monitoring exercises, NRW have observed a number of onsite operations that were causing unnecessary noise off site (for example bangs, clangs, vehicles driving quickly around site, shouting). These occurrences were noted less frequently, but were still happening during the most recent monitoring exercise.

Improvements have been put in place and the NMP updated, since the February monitoring. The Operator has committed to ensure adequate resources are in place to audit compliance and enforce where necessary. These audits should be documented, including any actions taken.

This is scored as a **breach of permit condition 1.1.1, category 3**, and NRW will audit over the next few months to review the Operator documented checks and assess compliance with the updated noise management plan, permit condition 3.5.2 and 1.1.1, will be reviewed at this time.

NRW are considering its enforcement response in relation to the outstanding non-compliance of permit condition 3.5.1 and failure to comply with the enforcement notice.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0035080**

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

Site	Dolwen Abattoir EPR/GP3235GH	Permit Ref	GP3235GH
Operator/Permit holder	Randall Parker Foods	Date	05/02/2019

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			
C2	C3	See CAR form text	15/06/2019

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.