

Compliance Assessment Report CAR_NRW0043101

Permit being assessed: CB3091HY.

For: Llangadog Pet Foods Plant, **held by:** United Petfood UK Limited

At: Tywi Valley Food Park, Station Road, Llangadog, SA19 9LY.

Type of assessment: Site Inspection,

Reason: Routine.

On: 12/12/2023 between 10:30 and 12:40.

Parts of permit assessed: See Section 4.

NRW Lead Officer: Benjamin Taylor, accompanied by Alex Bowder.

Report sent to: Zoë Nugent, Chris Moore, Technical Department , on 03/01/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Management - General management	Assessed (A)	
IR3A - Emissions and monitoring - Emissions to water, air or land	Action only (X)	
IR3B - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR3B - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	

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
IR3A	Confirm to NRW whether any air emission monitoring has been undertaken since 2019 as per section 3.5.1 of the	02/02/2024

Criteria	Action needed	Complete by
	permit.	
IR3B	Ensure all vessels which contain polluting substances are housed within secondary containment, or benefit from alternative spillage prevention.	28/06/2024
IR3B	Ensure the IBCs within the ETP are stored within the curtilage of a bund of sufficient size, fitted with a cover to prevent rainwater ingress.	28/06/2024

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

Introduction

United Petfoods Ltd manufactures canned (chunks and loaf) and tray pet food utilising approved sources of produce worldwide. The Site is approximately 16 acres in size comprising of a main process building used for production, storage, and distribution with a number of auxiliary buildings and storage areas.

The effluent treatment plant (ETP) is located to the southern fringe of the Site, just beyond the Afon Bran.

Attendees

Christopher Moore – Technical Department, United Petfoods

Zoë Nugent – Technical Department, United Petfoods

Benjamin Taylor - Senior Industry Regulation Officer, NRW

Alex Bowder - Senior Industry Regulation Officer, NRW

Scope

This was a pre-arranged familiarisation and introductory visit following the allocation of a new NRW regulatory officer. Furthermore, the visit had the potential to highlight any areas of focus (if present) for future compliance visits.

The visit was split up into an introductory meeting, followed by a Site walkover through the processes and layout of the Site. This facilitated a brief inspection of the ETP, boiler house and general site housekeeping i.e. storage of liquids.

Site Observations

Site Housekeeping

During the Site walkover, a large number of Intermediate Bulk Containers (IBCs) containing free-phase hydrocarbon were noted as stored outside of secondary containment upon hard-standing concrete.

Section 3.2.3 of the permit states:

'All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.'

NRW were informed that the storage of these containers in this manner is temporary, and the result of a process issue on their nearby sister Site. While all open drainage features within the area are directed to the ETP for treatment, there are still potential viable pathways to ground via failures in the concrete and unmade ground.

Action: Ensure all vessels which contain polluting substances are housed within secondary containment, or benefit from alternative spillage prevention.

Effluent Treatment Plant (ETP)

The ETP associated with the Site is a legacy system from the former Llangadog creamery. It is manually operated by two long-term standing members of staff who alternate to ensure the system is manned during operational hours (Monday – Friday).

To increase capacity the ETP is fitted with three storage vessels:

- Detritus Pit – 35m³
- Reception Pit – 70m³
- Lubek Tank – 461m³

These can be utilised during emergency situations where contaminated water needs to be diverted, as outlined within the Water Control Procedure. The contaminated water is channelled through a Dissolved Air Flotation (DAF) plant which removes contaminants via a flocculation process, the 'sludge' floats on the water surface and is mechanically skimmed off. The collected sludge is stored within a nearby tank and removed via a third-party contractor to an Anaerobic Digestion (AD) plant.

The effluent passes through settlement towers prior to entering the filter bed. The final stage of the treatment process before discharge is via the Clarifiers, which removes suspended solids from the

process flow.

All treated water is discharged via a V-notched chamber into the Afon Tywi. The operator provided evidence that the flow meter associated with the discharge point is MCERTS accredited. The discharge point (S1) is periodically inspected by onsite staff during the summer months.

ETP Chemical Storage

Two IBCs containing chemicals (Aquatreat 600 & Midfloc A258B) used within the ETP process were noted as stored outside of secondary containment within close proximity to the Afon Bran riverbank.

Section 3.2.3 of the permit states:

'All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.'

While the gradient of the ground surface, and nearby drainage features will likely direct any losses of chemical to the ETP for treatment, there is a viable pathway for contaminant entry to controlled waters via surface run-off or through percolation through unmade ground.

Action: Ensure the IBCs within the ETP are stored within the curtilage of a bund of sufficient size, fitted with a cover to prevent rainwater ingress.

Boiler House

The main boiler associated with the Site is a natural gas (NG) fuelled triple pass boiler system. These boilers are designed to be more efficient, by incorporating a three-chamber system to maximise the distance/time to extract the heat from the air flow.

The waste gas is discharged to atmosphere via a stack (A1) which is monitored every 3 years for oxides of nitrogen (NO & NO₂). The operator informed NRW that there is an intention to replace the current boiler system with a newer model.

Action: Confirm to NRW whether any air emission monitoring has been undertaken since 2019 as per section 3.5.1 of the permit.

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.