

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

Site	Felinfach Effluent Treatment Plant				Permit Ref	BP3135EB			
Operator/ Permit holder	Sensient Flavors Ltd and Volac International Ltd								
Date	31 December 2015				Time in	N/A	Out	N/A	
What parts of the permit were assessed	Notification under permit condition 4.3.1b - see below. Calendar year 2015 Improvement Condition IC1								
Assessment	Check Monitoring/sampling	EPR Activity:	Installation	X	Waste Op	Water Discharge			
Recipient's name/position	Byron Williams / ETP Manager								
Officer's name	Doug Cowie				Date issued		19 May 2016		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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

Condition(s) breached

a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	C3	3.1.2 Emissions to water
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A	
	2. Records of activity, site diary, journal & events	A	
	3. Maintenance records	N	
	4. Reporting & notification	A	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk), A = Assessed or assessed in part (no evidence of non-compliance), N = Not assessed, NA = Not Applicable

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	4
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

Site description

The Felinfach Effluent Treatment Plant (ETP) is located at Felinfach Industrial Estate, Ceredigion and processes and treats effluent from two nearby manufacturing sites: Sensient Flavors Ltd and Volac International Ltd. The ETP is operated jointly by a Consortium of Sensient and Volac and is permitted as an installation under Section 5.4 (The disposal, recovery or a mix of disposal and recovery of non-hazardous waste) of the Environmental Permitting Regulations (EPR).

The permitted installation comprises: a primary effluent treatment unit with balance tank; a dissolved air flotation (DAF) plant; anoxic pre-mixing (selector tank); a conventional activated sludge unit and gravity sludge settlement tanks. The treated effluent is discharged into the coastal waters of Cardigan Bay.

Purpose of visit/assessment

Condition 4.3.1(a) of permit XP3830UR requires the operator to inform Natural Resources Wales (NRW) in the event that the operation of the (permitted) activities gives rise to an incident or accident which significantly affects or may significantly affect the environment.

Condition 4.3.1(b) of permit BL7108IM requires the operator to inform Natural Resources Wales (NRW) in the event of a breach of any permit condition.

Condition 4.3.2 specifies that any information provided under condition 4.3.1 where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in Schedule 5 to this permit within the time period specified in that schedule.

Schedule 5 of the permit outlines the information that the operator must provide and is divided into Part A and Part B. The schedule provides a framework/template for informing and/or notifying NRW in accordance with the requirements of condition 4.3.1(a) or (b).

Condition 3.1.2 requires that the limits given in schedule 3 of the permit (point source emissions) shall not be exceeded.

The following operator notifications have been received concerning breaches/exceedances, incidents or accidents which occurred or were notified to us during **2015** (01 January – 31 December):

1. Notification received on 06/08/15 – W1 release of treated effluent from ETP

Compliance assessment

1. Schedule 5 Part A received 06 August 2015 (by email). **Condition 4.3.1(b)**

Total suspended solids (s/s) recorded at emission point W1:

Start time	End Time	W1 (mg/l)
02/08/2015 10:30	03/08/2015 08:00	632.00

W1: Release of treated effluent from ETP at NGR SN 4567 6368

Permitted limit is 150.00mg/l (24-hr flow proportional composite sample)

The operator informed NRW of this exceedance by telephone on 04 August 2015.

Part A operator comment: *Reduction in flow and loadings and import of seed and dosing schedule of polymer and ferric chloride introduced as advised by consultants MSA and Aquatreat to improve sludge settlement and sludge disposal rate. The analysis has been in consent when sampled on 4th 5th and 6th of August.*

The operator subsequently provided a Schedule 1 Part B notification containing the following additional information and representations in relation to this event:

Plant has continued to be within consent since the 4th of August following the measures implemented. Review of loadings and flows has been carried out and continual updating and review of control measures is taking place. Plant capacity review has been carried out and increased treatability capacity options are being considered.

The operator has not specified if this result has been reported as measured or if any measurement or sampling uncertainty factor has been applied. We have therefore assessed this particular result on the basis that it has been reported as measured. Schedule 5 of permit BP3135EB now specifically lists **measured value and uncertainty** as information that must be provided to meet the requirements of condition 4.3.2. The operator must specify measurement or sampling uncertainty when notifying NRW about future permit limit exceedances.

After applying the appropriate measurement uncertainty factor, this exceedance remains non-compliant with the permit limit and Condition 3.1.2. One **Category 3** score has been recorded (CCS reference 247201).

The root cause of this event and the monitoring arrangements at W1 will be reviewed as part of NRW's next compliance inspection at Felinfach ETP.

Improvement Condition (IC) 1

IC1 requires the operator to install and commission a flow weighted autosampler to collect samples of the treated effluent discharged from emission point W1 in order to meet the terms of conditions 3.5.1 and 3.5.3 of the permit. The deadline associated with this requirement was 31 August 2015.

In Schedule 3 Table S3.1 of the permit, Note 1 specifies that the spot sample for certain substances shall be replaced by a 24-hour flow proportional composite sample upon completion of IC1. Note 2 specifies that daily sampling previously limited to (Monday – Friday) shall be replaced by daily sampling upon completion of IC1.

During NRW's inspection at Felinfach ETP on 26 June 2015 (CAR 5953), the inspecting officers were shown the new AquaCell autosampler that was being installed to meet the monitoring requirements in the permit. We now require a written submission from the Consortium to formally confirm this autosampler has been installed and commissioned. This should be submitted to NRW no later than 29 July 2016.

[END OF SECTION 2]

	EPR Compliance Assessment Report	Report ID: 05958
This form will report non-compliance with your permit as determined by an NRW officer		
Site	Felinfach Effluent Treatment Plant	Permit
Operator/ Permit	Sensient Flavors Ltd and Volac International Ltd	Date
		EPR/BL7108IM
		19 May 2016

Section 3- Enforcement Response		Only one of the boxes below should be ticked
<p>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.</p>		
Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.		✓
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.		n/a
We will now consider what enforcement action is appropriate and notify you, referencing this form.		n/a

Section 4- Action(s)			
Where a non - compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
G4	N/A	<p>The operator is reminded that Schedule 5 of permit BP3135EB specifically lists measured value and uncertainty as information that must be provided to meet the requirements of condition 4.3.2.</p> <p>The operator must specify measurement or sampling uncertainty when notifying NRW about future permit limit exceedances.</p>	Before next Schedule 5 notification is submitted to NRW
G1	N/A	NRW requires a written submission from the Consortium to formally confirm the ETP flow weighted autosampler has been installed and commissioned and the requirements of IC1 have been addressed.	29 July 2016

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 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 which 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 Natural Resources Wales (NRW) to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

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

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 twenty 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 the officer's line managers. 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) 601 0987**.