

Compliance Assessment Report CAR_NRW0044056

Permit being assessed: BU8002IT.

For: Cross Hands, **held by:** Dunbia UK

At: Cross Hands Business Park West , Cross Hands, Carmarthenshire, SA14 6RF.

Type of assessment: Site Inspection,

Reason: Routine.

On: 08/04/2024 between 09:45 and 12:45.

Parts of permit assessed: Management, Operations, Emissions and Monitoring..

NRW Lead Officer: Alex Bowder, accompanied by Daniel Packer.

Report sent to: Luke Healy, Victoria Kerr, Lewis Elsey, Chris Dodd, Environmental Coordinator, Environmental Manager, Health, Safety & Environmental Officer, HSE Manager, on 22/04/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR2C - Installations - Operations - Operating techniques	Assessed (A)	
IR3A - Installations - Emissions and monitoring - Emissions to water, air or land	Action only (X)	
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Assessed (A)	
IR3F - Installations - Emissions and monitoring - Pests	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
IR3A	The operator must continue to investigate the root cause of activities that are increasing ammonia levels to exceed the permitted emission limit.	18/05/2024

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 Compliance Assessment Report (CAR) details the comments of Natural Resources Wales (NRW) Officers for the site inspection conducted on 8 April 2024 at Cross Hands Meat Processing Plant, Cross Hands Business Park West, Cross Hands, SA14 6RF for activities held by Dunbia (UK) (the operator) under the environmental permit EPR-BU8002IT.

Introduction

The visit purpose was to conduct an introductory inspection of the operator's environmental permit by NRW Regulation Officers Alex BOWDER and Daniel Morgan PACKER.

There were no non-compliance scores recorded against the operator's permit conditions on this inspection.

Attendees

- Alex Bowder - Senior Regulation Officer, NRW
- Daniel Morgan Packer - Senior Regulation Officer, NRW
- Chris Dodd - HSE Manager, Dunbia
- Victoria Kerr - Environmental Manager, Dunbia
- Lewis Elsey - Health & Safety Environmental Officer, Dunbia

Permit overview - EPR/BU8002IT/V007

In February 2022, the operator's permit was varied following the publication of the revised Best Available Techniques (BAT) Reference Document (*BRef*) for the Food, Drink and Milk Industries.

The installation is located adjacent to the A48 with the Afon Gwili watercourse in the vicinity. The main environmental risks from permitted activities are:

- Storage of chemicals used for site processes

- Emissions to air and water
- Potential for odour pollution from activities

The site operates 24 hours a day all year.

Inspection Commentary

At 09:45am NRW officers arrived at the site's security station and parked in the designated visitor area. Officers signed in and were met by Dunbia staff Chris Dodd, Victoria Kerr, and Lewis Elsey in the meeting room where began introductions. An overview of the visit purpose was relayed with brief discussions regarding the site's compliance history and the business' decarbonisation goals moving forward.

Officers commenced the inspection with a walkaround the outside of the yard looking at the various process activities. This included the: (i) drainage systems, (ii) waste storage areas, (iii) boiler house, (iv) effluent treatment, and (v) refrigeration system. This was followed by a tour of process within the food preparation hall areas.

Site Drainage

Surface waters from the yard areas are collected and passed through an oil interceptor. This water is collected within an attenuation pond before subsequent discharge to the adjacent watercourse. Roof water is also collected and channelled to the attenuation pond.

Liquid waste effluent receives primary on-site treatment before being discharged to the foul sewer under a trade effluent discharge consent issued by Dwr Cymru Welsh Water. There were no issues noted with the drainage system at the time of inspection.

The operator mentioned that the site is looking to repair and install new drainage channels to improve the efficiency of the system. This was said to be difficult to schedule the works as it would be conducted whilst the site was operational requiring minimal disruption to the vehicle pathways. Officers noted some metal sheeting placed across sections of the surface drainage slots to protect any weakened areas from heavy vehicle-use.

Emission Points

The site has various emission points listed in the permit:

- ten to air: A1, A2, A3, A4, A5, A6, A7, A8, A9, and A10
- two to water: W5 and W6
- one to sewer: S1

In 2018 the permit was varied to add an additional CO₂ cylinder to the site, with an application to replace the tanks in 2021. The redundant cylinders are situated to the right of new station with the view to be decommissioned when time is afforded.

W5 sampling point

On 27 March 2024, an incident occurred involving the gas housing station where a manoeuvring vehicle knocked into and damaged the block. Once identified, the release was isolated whilst a repair was made to one part of the pressure relief valve damaged pipework. The operator detailed how it intends to install a barrier in front of the station to prevent reoccurrence.

Please note: this event will be assessed as part of quarterly monitoring and reporting requirements.

Waste storage areas

There is a designated area for the segregation and storage of general waste streams produced from the process in relatively small volumes consisting of pallet wood, waste packaging and cardboard. All recyclable wastes are collected and recycled/disposed of by an external contractor,

although the areas are managed by the operator on a day-to-day basis.

Waste oil is stored in a double-skinned tanker and is removed via a licenced contractor periodically. There are water tanks situated at the rear of the building for the sprinkler systems and fire mitigation. Towards the rear of the premises there is a contractor's storage area with various construction materials. CCTV is present on all sides of the site within the permit boundary and is manned by security 24/7.

Boilers

There are two gas boilers installed with the concept of one acting as contingency if one fails. Stack emission testing is conducted annually by a contractor. Officers also visited the gas-powered steam generator area.

Effluent Treatment Plant

Officers inspected the site's treatment plant area located outside. This area is afforded with suitable impermeable surface which is fenced-off from the neighbouring work areas. It consists of an initial effluent reception where solids are separated, balance tanks, and a DAF unit. Chemicals are not automatically dosed to the system. The DAF is housed inside a unit with a sampling station under cover. There were no issues apparent at the time of inspection.



Image 1 – showing part of the effluent treatment plant with chemicals on secondary containment bunds



Image 2 – DAF showing effluent discharge housed within a unit

There is a chemical store on site housed in concrete block structure with a lockable metal fencing gate. All chemicals within the unit were provided with suitable secondary containment bunding for the various vessels with spill kits located nearby.



Image 3 - showing the chemical storage area

Energy Centre

An energy centre is incorporated within the installation to provide a central point for the generation and distribution of utilities. This includes primary water boilers, electrical distribution, distribution of utilities and a refrigeration plant.

There are releases to air of combustion by-products from the boilers and steam from cookers within the Installation.

Officers walked through refrigeration system with the condenser unit and were shown the SCADA system controlling the various process gauge levels. Staff explained how this system is managed by contractors and the notification alarm system is in place with a list of specific contacts if a section fails, for instance.

Compactors

The operator has previously highlighted potential issues with liquid seepage when skips are disconnected from the compactor. The operator is looking to upgrade the compactor for a skip that

has a built-in compacting function, which could eliminate the need for disconnection and unwanted leakage. Please keep NRW updated with regard to this.

At the time of inspection it was noted that that the foul water drainage system around the compactor skips was overflowing and appeared to be making its way towards the surface water drainage. Please ensure that this is managed accordingly going forward.

Preparation Hall

Officers were provided with appropriate clothing and taken to the food processing hall where there are three main elements:

- The preparation of raw meats to be cooked by the consumer
- The preparation of raw meat packs with added ingredients such as sauces, spices, and marinades
- The preparation and cooking of meat products to be reheated by the consumer.

The operator stated that its workload is directly impacted by customer demand, which generates increased production periods based on seasonal needs and reactive working patterns.

Solid wastes generated at the site are sent off-site for appropriate disposal. There are no blood tanks on site as there is minimal residual blood from the process. All plant wash goes through the drains to ETP. The operator recently added shelf-stacking to the room to improve efficiency of the room. Officers were shown the meat cooking, mincing, shaping, and packaging parts of the process. The operator detailed the rigours cleaning schedule and hyenine standards adhered to.

Meeting conclusion

Officers concluded the site tour and inspection in the meeting room. The operator showed its internal waste matrix where details of the contractors and respective credentials are kept and updated. Specifically shown waste wood and oil removal contractors as referenced on during the inspection walkaround. Officer Bowder stated that NRW intend to have focussed audits of site activities going forward.

Emission Limit exceedances

Officer BOWDER raised the compliance issue surrounding the site's historic and consistent exceedance of permitted ammonia limits - ELV of 0.25 mg/l and averaging readings of around 0.3 mg/l. The operate detailed its efforts in trying to identify the source of the problem. The site drainage channels, and roof areas are cleaned periodically removing build-up of algae or leaves, which is believed to be the current source of the issue. Additionally, any potential leakage from the compactor has been highlighted as a possible contributing factor. This is being addressed by upgrading the equipment.

Action

The operator must continue to investigate the root cause of activities that are increasing ammonia levels to exceed the permitted emission limit.

Officers left site at 12:40.

Thank you to the operator for taking the time to provide NRW with a comprehensive tour of site process and explain the various work areas.

If you have any issues with this compliance report, please contact Senior Regulation Officer Alex Bowder at Alex.Bowder@cyfoethnaturiolcymru.gov.uk.

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.