

## Compliance Assessment Report CAR\_NRW0045816

**Permit being assessed:** AB3591ZQ.

**For:** Maelor Foods Limited, **held by:** Maelor Foods Limited

**At:** Maelor Foods Limited, Pickhill Lane, Cross Lanes, Wrexham, Wrexham, LL13 0UE.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 11/12/2024 between 10:00 and 11:15.

**Parts of permit assessed:** See Report.

**NRW Lead Officer:** Kathryn Bradshaw.

**Report sent to:** Environmental Officer, Environmental Officer, on 17/12/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2B - Installations - Operations - The site	Assessed (A)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Assessed (A)	
IR4C - Installations - Information - Notification	Assessed (A)	
IR1A - Installations - Management - General Management	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
IR2C	1) Ensure the trailer is fully contained without any leaks or run off before it is moved outside of the bunded area.	23/12/2024
IR1A	2) Update the Management of Effluent procedure (EMS 9.1.12.2) and any other associated procedures to reflect the changes in the process and ensure all relevant staff are trained. Forward a copy of the updated procedures and training records to NRW.	31/01/2025

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) has been raised following a routine unannounced site inspection.

On 7<sup>th</sup> October 2024 the site informed NRW of a temporary process change relating to the effluent treatment plant (ETP). The site was trialling the use of a screw press for use on the sludge that is produced from the ETP with the aim of sending this waste to anaerobic digestion instead of land spreading. Detailed information was provided on the specification, location and objectives of the trial. NRW were notified on 22<sup>nd</sup> November 2024 that due to some technical issues with the screw press the ETP plant had reached critical threshold levels as per the EMS 9.1.12.2 Effluent Management Protocol. A replacement screw press was procured and waste was continuing to be processed through the ETP.

The site inspection was to view the screw press and check on the current tank levels as well as a general site walk over. A replacement screw press was being used during the inspection in the bunded effluent area. The solids that were being produced were being stored in a dolav then being transferred to a trailer. Liquid run off was seen coming from the trailer but was within the bunded area which drains to a sump and is then pumped back to the raw effluent tank. The site is currently producing 3.5 tonnes of filter cake per day, stored in the trailer and removed once per week.

### **Action**

- 1. Ensure the trailer is fully contained without any leaks or run off before it is moved outside of the bunded area.**
- 2. Update the Management of Effluent procedure (EMS 9.1.12.2) and any other associated procedures to reflect the changes in the process and ensure all relevant staff are trained. Forward a copy of the updated procedures and**

**training records to NRW.**

The site explained their plans for next year for making the screw press a permanent part of the ETP process alongside sourcing an outlet for the filter cake. The process is currently being run with temporary flexible pipes from the sludge tank to the screw press. Future plans will mean hard piping and full integration of the process alongside housing the press in its own building.

The tank levels in the ETP during the visit were no longer at the critical stage and levels on the HMI were showing:

18% full for the divert tank

96% full for the balancing tank

75% full for the sludge tank

Suspended solids, pH, temperature and flow which were showing on the HMI were within the permitted emission limits values (ELV) for the discharge point W1.

There was a moderate localised odour in the ETP area. A walkover around the rest of the site was conducted. Drilling was ongoing as part of the borehole 2 project. No odours were detected around the rest of the site.

Site provided an update on some other improvements that have been implemented since the last visit including installing more noise attenuation in the ETP area as well as the main building. New refrigerated trailers are being purchased to replace some of the fleet which will have improved noise attenuation.

The site confirmed they are still running at the production level of 1 million birds per week and they do not yet know when production will increase to 2 million birds per week but will inform NRW when this is the case.

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](mailto: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](mailto: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.