

## Compliance Assessment Report CAR\_NRW0046181

**Permit being assessed:** BP3135EB.

**For:** Felinfach Effluent Treatment Plant, **held by:** Volac Whey Nutrition Ltd

**At:** Sensient Flavours, Felinfach, Lampeter, Ceredigion, SA48 8AG.

**Type of assessment:** Check Monitoring/Sampling,

**Reason:** Routine.

**On:** 31/12/2024.

**Parts of permit assessed:** Emissions & Monitoring, Reporting.

**NRW Lead Officer:** Rhydian Cox.

**Report sent to:** WWTP Manager, WWTP Manager, on 14/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Installations - Information - Reporting	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?

No action required.

### 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

### **Felinfach ETP Annual Returns 2024**

This Compliance Assessment Report (CAR) has been issued in response to the submission of the 2024 Annual Monitoring Returns by Sensient Flavours Limited & Volac International Limited for activities at Felinfach Effluent Treatment Plant, Felinfach Industrial Estate, Lampeter, Ceredigion, SA48 8AG under permit number EPR/BP3135EB.

Monitoring returns and reports for the following period(s) have been assessed in this CAR form:

- Reporting of emissions to water for the period from 01/01/2024 to 31/12/2024
- Reporting of Water Usage for the year 2024
- Reporting of Energy Usage for the year 2024
- Reporting of other performance indicators for the period 01/01/2024 to 31/12/2024
- 2024 Q1 – Q4 Waste Returns

This CAR was undertaken on 14 February 2025. However, to ensure that the CCS scoring is attributed to the correct financial year (for billing) the date on the CARS has been altered to 31 December 2024.

### **Compliance Assessment**

Table S4.1 (Schedule 4(b)) of the permit states that the annual reporting period for emissions to water begins on the 1 January. Condition 4.2.3 of the permit states that the operator must submit the annual reporting within 28 days of the end of the reporting period. The operator submitted the annual reports on the 29 January 2025 in compliance with permit requirements.

### **Emissions to Water**

The operator submitted the *Reporting of emissions to water for the period from 01/01/2024 to 31/12/2024* in the agreed reporting format (Form Number: Water1 / 17/08/2022). All reporting parameters within Emission Limit Values stated within the permit - No exceedances reported.

Initial review of the submission raised a query relating to the date of the sampling for Total Phosphorus (Total P) being outside of the sampling window. Confirmation received from operator that an error was made when inputting the sample date into the reporting form. The date in the report was 28/10/2023, when it should have in fact read 28/10/2024. No non-compliances recorded.

### **Performance Reports**

Condition 4.2.2 of the permit states that reports on the performance of the activities over the previous year shall be submitted to NRW by 31 January. The operator submitted the 2024 annual performance reports on 29 January 2025 in the agreed reporting forms in line with condition 4.2.2(c).

Water Usage

Reporting of 2024 annual water usage of both Mains and Site borehole water has been reported to NRW in line with table S4.3, in the agreed reporting format (Form Number: WaterUsage1 / 17/08/2022). No issues noted.

Energy Usage

Reporting of 2024 annual energy usage has been reported to NRW in line with table S4.3, in the agreed reporting format (Form Number: Energy1 / 17/08/2022). No issues noted.

Performance Indicators

Other performance indicators for the 2024 annual reporting has been submitted to NRW using the required reporting form (Form Number: Performance1 / 17/08/2022). Included within the form are reports for; Treated liquid effluent discharged at W1, Sludge collected for off-site recovery, sodium hydroxide used. Submitted in line with table S4.3.

No data was provided for both Generation of residues and Generation of wastewater. Conformation received from the operator that both parameters are in fact nil returns.

Annual Waste Returns (Q1-4)

Quarterly waste returns have been submitted to NRW for all four quarters in 2024 using the specified reporting form (E-Waste and MF Return Form – NRW version 8). These returns are routinely emailed to NRW's Waste Returns Team and the regulating officer is copied in.

Waste codes consistent with Table S2.2 of the permit have been used within the 'Waste Received' portion of the returns, reflecting the industrial processes which direct effluent to the permitted installation. The total throughput of waste accepted at the site over 2024 does not exceed the annual limit outlined in table S2.2 of the permit.

The returns also include a record of waste(s) removed from the installation for recovery elsewhere (recovery code R10: land treatment resulting in benefit to agriculture or ecological improvement).

**END**

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.