

Compliance Assessment Report CAR_NRW0049634

Permit being assessed: AB3492ZQ.

For: Wrexham Mill, **held by:** Lloyds Animal Feeds (Western) Ltd

At: Bridge Rd North, Wrexham Ind Est, Wrexham, Wrexham CBC, LL13 3PS.

Type of assessment: Site Inspection,

Reason: Routine.

On: 10/10/2025 between 10:15 and 10:45.

Parts of permit assessed: See Report.

NRW Lead Officer: Kathryn Bradshaw.

Report sent to: Site Manager, Site Manager, on 14/10/2025.

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	Ongoing (O)	2.1
IR2B - Installations - Operations - The site	Assessed (A)	
IR3I - Installations - Emissions and monitoring - Fire	Assessed (A)	
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR2E - Installations - Operations - Improvement programme	Assessed (A)	
IR3B - Installations - 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
IR2A	Apply for a permit variation for the extra air emission point	30/01/2026
IR3B	Provide a timescale of when the bunding of the storage tanks will be re-engineered.	28/11/2025

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 pre-arranged inspection.

The site has still not applied for a permit variation to include the extra air emission point from the CHP unit. Air emissions monitoring was scheduled for September to monitor emissions from the CHP stack to assist in the permit application process. However, during this time the port for the emissions monitoring was damaged and the contractors could not undertake the monitoring. The Operator stated that this will be scheduled in the next few weeks.

This is in breach of permit condition 2.1.1, Schedule 1, Table S1.1 (the activities) this score is suspended as it was previously scored in CAR_NRW0045114.

As soon as this information becomes available a permit variation needs to be applied for, any further delays to this and NRW will consider our enforcement response.

Action

Apply for a permit variation for the extra air emission point by 30th January 2026.

The vehicle wash down area has been increased with kerbing installed around the area to capture all run off which is discharged via an interceptor to sewer.

The area adjacent to the new intake mill still had numerous items of discarded equipment, although causing no pollution issues, the area looks untidy and unsightly. The site has plans to remove all this waste when resources allow.

The site has plans to improve the bunding around the storage tanks to encompass the off-take pipes. Currently buckets are used to capture any leaks or spills when the tanks are filled. It would be advisable if the guidance 'Containment systems for the prevention of pollution' is consulted before any work is undertaken. A copy of this guidance is provided

with this CAR form.

Action

Provide a timescale of when the bunding of the storage tanks will be re-engineered by 28th November 2025.

Discussions were held about the fire that occurred at site on 15/04/25 (WIRS 2503898). Site staff notified NRW at the time of the incident and advised it was all contained within the building and that there was no fire water run-off outside the building which could have entered the surface water drainage. The source of the fire appeared to be a metal door that was catching on the cooler which created a hot spot within the cooler, causing the feed within the cooler to smoulder emitting smoke through the cooler exhausts. Water was used within the cooler to dampen down. A new door has now been installed.

It is advised that routine checks and maintenance of the coolers is implemented, if not already in place, to prevent re-occurrence.

An odour could be detected on site at the time of the visit and was linked to the facility. No odour was detected outside of the site boundary.

Improvement Conditions

IC1

The Operator shall submit to Natural Resources Wales an updated written procedure(s) describing how they intend to meet the following BAT requirements in accordance with requirements specified within:

- *BAT Conclusion 14 of the Food, Drink and Milk Industries BRef Document (EU 2019) – Techniques to prevent, or where not practicable reduce noise and vibration emissions*

Evidence was provided to comply with this IC as follows:

- Annual noise assessments are carried out by an independent contractor.
- A scheduled maintenance programme is in place to ensure all mill equipment is in good working order and not making excessive noise.
- All doors and windows are kept shut whenever possible.
- Incoming ingredients are generally not permitted to discharge loads between the hours of 11pm and 6am.
- The grinders are the noisiest pieces of equipment on site and are fully enclosed within their own room.
- The dB level of any new or replacement equipment is considered to ensure they are quieter, an example is Press 2 which has been recently upgraded which is significantly quieter and more efficient.

IC2

The Operator shall submit to Natural Resources Wales an updated written procedure(s) describing how they intend to meet the following BAT requirements in accordance with

requirements specified within:

- *BAT Conclusion 7 of the Food, Drink and Milk Industries BRef Document (EU 2019) - Water consumption and wastewater discharge*

Evidence was provided to comply with this IC as follows:

- Water usage figures are monitored on a monthly basis, but water is monitored during production very closely for quality of the final product.
- Water usage is reviewed quarterly by the Board and once every two months in the General Operations meetings. Any improvements that can be made are identified through these meetings.

IC3

The Operator shall submit to Natural Resources Wales an updated written procedure(s) describing how they intend to meet the following BAT requirements in accordance with requirements specified within: • BAT Conclusion 2 of the Food, Drink and Milk Industries BRef Document (EU 2019)- Establish and maintain a wastewater and waste gas inventory as part of the EMS

Evidence was provided to comply with this IC as follows:

- Contactor maintains and checks the burners in the boiler.
- Gas usage is monitored and reviewed quarterly.
- Annual air emission data is tracked and monitored.

Following a review of all the information submitted and reviewed it is deemed that IC's 1-3 are all complete.

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.