

Compliance Assessment Report

Report ID:
CAR_NRW0035860

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

Site	Dowlais Slaughterhouse EPR/AP3433ES	Permit Ref	AP3433ES		
Operator/Permit holder	Kepak Group Limited				
Regime	Installations				
Date of assessment	17/10/2019	Time in	10:00	Out	13:00
Assessment type	Audit				
Parts of the permit assessed	ETP				
Lead officer's name	Taylor, Richard				
Accompanied by	Harris, Geraint				
Recipient's name/position	Sharon Corcoran/ Group Environmental Manager	Date issued	23/10/2019		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). 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	CCS Category	Condition(s) breached
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KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for 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 (eg. 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 advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Kepak Ltd AP3433ES

Effluent treatment plant audit – 17th October 2019

Present; Kepak Personnel; Sharon Corcoran (Group Environmental Manager), Daniel Nolan (Operations Manager), Paul Williams (Site Environmental rep), Dean Phillips (Technical), Gareth Gooding (Engineering),

NRW Personnel – Geraint Harris (Industry & Waste Officer), Richard Taylor (NRW Site Inspector).

Purpose of Inspection

Site is receiving a persistent number of complaints from the public regarding odour in the local Dowlais Top community. As such it was prudent to audit the site Effluent Treatment plant (ETP) to answer the following points;

1. Can the Effluent treatment system be by-passed to allow untreated effluent to enter the local sewage network?
2. Is the site meeting its requirements under its EPR permit?

ETP Bypass

Site personnel present confirmed that the system could not be easily by passed in order that untreated effluent could be allowed to flow off site into the local sewer network. This was confirmed later during the physical inspection of the ETP. Inspecting Officers could see that there were locks and clamps in place which could not easily or forcibly be removed. The ETP was seen to be fed by 3 main incoming sources which all fed into 2 large 200m³ holding/balancing tanks. These fed into the ETP. This is primarily a Dissolved Air flotation (DAF) plant, with top scrapers skimming the gathered fats into a collection vessel for removal. The effluent passes through a series of diminishing mesh grids to remove larger contaminants prior to this

process. The ETP is itself reasonably secure in a separately house building. The plant is offline on Sunday between shifts.

Effluent Quality

The effluent was inspected at several junctures throughout the process. At no time was the odour experienced uncomfortable. One point of note was that the effluent is sampled before it is dosed with peroxide. It was seen to leave site via a chamber which is also fed with domestic office/canteen effluent. The sampled effluent needs to be representative of the effluent leaving the site boundary. It should comply with **EA TGN M18 at section 5.1**

Extract from M18 guidance document and assessment of the current situation;

<https://naturalresources.wales/media/2109/technical-guidance-note-m18-monitoring-monitoring-of-discharges-to-water-and-sewer.pdf>

M18 guidance	Site comparison
Discharge sample points must be at a location that ensures that the sample is truly representative of the discharge.	Sampling point is some distance upstream of leaving site boundary. Additionally, the effluent is dosed with peroxide after samples are taken.
The sampling point location should be agreed with us, documented and clearly and permanently labelled.	Original documents would have been included with the permit submission. However, the system has been modified from the 2001 application form. A representative diagram is required.
A sampling position in a pipe or channel must be sufficiently far downstream of the last inflow that mixing of the two streams is complete.	The sample point is some distance upstream in the area where it leaves the ETP. It subsequently flows to join the domestic sewerage effluent. Along the route it is dosed with peroxide. It also has the potential of picking up any contamination from the pipework (dissolved metals), plus any non-mapped incoming streams, or any groundwater which may enter through broken pipes. This results in the potential for the effluent leaving site not being representative of the site emission.
Samples at an outfall should be taken from regions of high turbulence and good mixing, usually at the centre of the discharge. Solid materials will have little chance to settle out here.	Sampling location may not be the best, but the samples are taken from a place of high turbulence and appear to be well mixed.
When sampling from chambers (for example manholes), avoid contamination of the sample by the disturbance of deposits from the cover when the cover is lifted and prevent contamination of the sample from the chamber	Guidance to be observed in the site sampling protocol.

walls and any bottom deposits.	
Samples may also be drawn off from effluent streams at a tap. Care should be taken to ensure any dead space is flushed out with effluent before the sample is collected.	Guidance only.

Ideally the effluent should be sampled as it leaves the permitted site boundary in order to ensure that the effluent is representative of the sites process and does not pick any incoming substances which would render the results unrepresentative. The site will be audited in Jan 2020 using the Operators Monitoring assessment tool (OMA) so that the sampling position can be fully quantified.

Action – NRW to schedule OMA Water audit Jan 2020.

Improvement Areas.

Several items were identified for improvement during the inspection.

ETP Schematic Diagram. There was a lack of an updated representative diagram of the whole Effluent Treatment process.

On site Laboratory. Site identified the need for an on-site laboratory to be used as a check facility for the sites releases to sewer and surface water. This would enable the site to have an instant quality check rather than waiting for their current MCERTS accredited Lab to send their results, which is often 2 weeks after the sample was taken. This was seen as a welcome improvement to the process by NRW and should enable the site to be more proactive in response to changes in water quality.

Effluent Trials

Site were advised to inform Welsh Water of any trials which may occur with the effluent from site prior to them taking place.

Audit the Contractors

Site are encouraged to audit any contractors who remove waste from site. This could be by following a contractor's vehicle to ensure waste it is disposed of correctly and not fly-tipped. This exercise has the twofold benefits of potentially saving reputational damage, as well as testing the system in place on site

works.

Site Maintenance

The Group Environmental Department need to work closely with maintenance to ensure that cracks in the concrete surfaces throughout site are constantly repaired. Cracks provide a pathway for contaminated liquids and oils to penetrate to the sub soil. A rolling programme of repairs mitigates the risk of pollution occurring. This extends to the ETP roof where some holes were seen and need to be repaired. Some manholes were seen to be overgrowing with vegetation which needs to be kept back. Rust was seen around the lip of the entrances which is advised to be treated and minimised to prolong the integrity of the opening.

Improvements/Actions	Due date
1. Updated representative Schematic diagram of the ETP to be sent to NRW.	ASAP
2. On Site laboratory	Ongoing
3. Effluent Trials	Inform Welsh Water
4. Audit the contractors- recommended	ASAP and ongoing cycle
5. Site Maintenance – concrete floors, roofing, access manholes were seen to need repairs.	ASAP and on a constant cycle of improvement

The site tour was of the external areas of the site as well as the whole effluent treatment system. There were no birds seen, or any vermin, pests or insects. No excessive odour was experienced. Security was good.

Next Inspection – OMA Audit 30th Jan 2020.

EPR Compliance Assessment Report

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Operator/Permit holder	Kepak Group Limited	Date	17/10/2019

Section 3 – Enforcement Response

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.

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.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

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 verbally or 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 that 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 the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The 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 (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The 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

The 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 fifteen 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 officer's line managers using the informal appeals procedure. 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 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.