

Rogers & Co Glanhirin - Document Reference 1: application summary and document reference

Application for an environmental permit – bespoke sheep dip disposal

Tanya & Erinna Rogers farm business: Rogers & Co., Glanhirin, Elan Valley, Rhayader, Powys, LD6 5HS, 01597 810973

Document references:

- Doc 1 = This Application summary - here
- Doc 2 = **Environmental Management System** including:
 - o Record of discharge to land of used sheep dip p.2
 - o Maintenance operations checklist pp.3-4
 - o Maintenance record p.5
 - o Storage list p.6
 - o **Risk Assessment / Accident Management Plan** - Accident management of near misses, accidents, or incidents pp.7-9
 - o **Spill procedure** p.10
 - o Record of accidents, other incidents, or near misses p.10
 - o Training record p.12
 - o Complaints record p.13
 - o Key site and emergency contacts p.14
- Doc 3 = Site map (attached)
- Doc 4 = Application form Part A
- Doc 5 = Application form Part B2
- Doc 6 = Application form Part B7
- Doc 7 = Application form Part F
- Doc 9 = Cheque for Application Form Part F

Additional information

1 Regarding Doc 5 - Application Form Part B2:

Qu 1a - Discussions before Application On Friday 22nd November 2019 I had a telephone calls with:

- NRW Environmental Advisor Pippa Knight clarifying questions and terminology on the application forms
- NRW advisor Mr Ken Perry regarding the Environmental conditions of the farm and recommendations as to fields we can apply for in this application for licence to dispose of sheep dip.

Qu 2a - About the site - National grid reference Farm house & yard = SN 86507 71664

Qu 3d - Technical knowledge and ability

(Tanya Rogers) **City & Guilds NPTC Level 2 Award in the Safe Use of Sheep Dip** (Accreditation Number 500/7692/9) - includes both *Part A Know How to Sheep Dip* (Y/600/6352) and *Unit 01 Practical Sheep Dipping* (D/600/6353) – Certificate Number: 777125; Date of issue: 27/03/2015.

Rogers Glanhirin - Management system, Risk assessment, and Spill procedure follow Gov.UK, Natural Resources Wales, and Health and Safety Executive regulations outlined in:

- a. Gov.UK Guidance – *Sheep Dip: Groundwater Protection Code*
<https://www.gov.uk/guidance/sheep-dip-groundwater-protection-code>
- b. Natural Resources Wales - *Environmental Management Toolkit*
<https://cdn.naturalresources.wales/media/2081/environment-management-toolkit-management-toolkit-for-operators.pdf?mode=pad&rnd=131467651210000000>
- c. Natural Resources Wales - *Management System Template for Operators who have a permit to discharge used or waste sheep dip to land*
([https://cdn.naturalresources.wales/media/2082/environmental management tool kit for operators holding a permit.pdf?mode=pad&rnd=131463233140000000](https://cdn.naturalresources.wales/media/2082/environmental%20management%20tool%20kit%20for%20operators%20holding%20a%20permit.pdf?mode=pad&rnd=131463233140000000))
- d. Health and Safety Executive *Sheep Dipping advice for farmers and others involved in sheep dipping* <http://www.hse.gov.uk/pubns/ais41.pdf>
- e. Health and Safety Executive *Guidance on storing pesticides for farmers and other professional users* <http://www.hse.gov.uk/pubns/ais16.pdf>

2 Regarding Doc 6 - Application Form Part B7

As you can see on the Site Map (Document reference 3) – to help with identifying an appropriate “discharge area”, I have included what I think are three possible disposal sites:

1. **Field number SN8671-8566 with Grid Reference SN8671071824 Field size 7.48 ha with “discharge area” 3 ha.** I’d prefer Discharge area site 1 because I think this is the largest of the three areas to dispose of the sheep dip - away from surface water, habitat, etc. - and large enough to cope with the volume of disposal at 3-parts water/1-part sheep-dip.
2. **Field number SN8671-4287 with Grid reference SN8642171931 Field size 1.82 ha with “discharge area” 1 ha**
3. **Field number SN8671-5359 with Grid refence SN8652371603 Field size 0.34ha with “discharge area” 0.3 ha**

All three “discharge sites” have the same answers to questions 2 Local Environment: Water features, Soil, Drainage, and Vegetation.

Management System and Risk Assessment - dipping sheep & disposal of sheep dip

1. Record of discharge to land of used sheep dip p.2
2. Maintenance operations checklist pp.3-4
3. Maintenance record p.5
4. Storage list p.6
5. Risk Assessment / Accident Management Plan - Accident management of near misses, accidents, or incidents pp.7-9
6. Spill procedure p.10
7. Record of accidents, other incidents, or near misses p.10
8. Training record p.12
9. Complaints record p.13
10. Key site and emergency contacts p.14

[illegible]

(will do larger copy for better viewing if gain disposal)
(Larger copy included with dip disposal licence application.)

1 Record of discharge to land of used sheep dip

(as Natural Resources Wales document enclosed with application - Management System template for operators who have a permit to discharge used or waste sheep dip to land , p.4)

If we or RPA or RIW visit you to check how you are complying with your permit, we will ask to see these records. Site name: Permit number: Contractor name and address if applicable: For each discharge fill in one column. Make sure you put the discharge date at the top.

Site name: Glanhirin

Trained operator name and licence: Tanya Rogers, City & Guilds NPTC Level 2 Award in the Safe Use of Sheep Dip (Accreditation Number 500/7692/9)

Permit number: [applied for]

Required records	Discharge date:	Discharge date	Discharge date:	Discharge date:	Discharge date:	Discharge date:
Location, substances and equipment Location of discharge area. State the field number or national grid reference and location within the field. Or cross refer to an attached map showing the location. Note: You may only discharge at specified areas within the discharge area as stated in your permit. [applied for]						
Spreading equipment:	Slurry tanker					
Licensed brand name or chemical composition of dip [licensed applied for so yet to purchase – if licence permitted]						
What used to dilute?	Water					
Discharge volumes (CM ³) [licence applied for] A: volume undiluted B. Volume of water added (3:1) C. Total volume discharged d. Area of land used for discharge [licence applied for] E. Application rate of sheep dip to land (c/d)						

2 Maintenance/Operations checklist

Maintenance Operations checklist (groundwater authorisation site). Follow:

- Gov.UK Guidance – **Sheep Dip: Groundwater Protection Code**
<https://www.gov.uk/guidance/sheep-dip-groundwater-protection-code>
- Heath and Safety Executive **Sheep Dipping advice for farmers and others involved in sheep dipping** <http://www.hse.gov.uk/pubns/ais41.pdf>
- Health and Safety Executive **Guidance on storing pesticides for farmers and other professional users** <http://www.hse.gov.uk/pubns/ais16.pdf>

Item	Day	Week	Month	Year	Prior to dip'n	After dip'n	Where are maintenance instructions?
Check the weather forecast prior to dipping and don't dip if rain is likely within 24 hours.					✓		Farm records in house
You must check dipping bath for cracks, holes and leaks. Do this by filling the bath with clean water, leave overnight and if the water level is unchanged add dip concentrate ready for dipping operations. If the water level has fallen overnight, leaks must be located and permanently sealed before any dipping is done.					✓		
If you have a drain hole in the dipping bath, ensure this is permanently blocked.					✓		
Inspect the draining pens for potential leaks, cracks, holes etc. Seal any that are found.					✓		
Ensure all maps are kept up to date with details of surface waters; springs, boreholes and other vulnerable groundwater so dipping activities are kept away from these sensitive areas.				✓			
Ensure that the drainage pens direct drainage back into the dipping bath and that they can hold the sheep until any liquid has stopped dripping from their fleeces. (minimum of ten minutes)					✓		
Ensure you are using the correct product for the job. Plunge dips are not authorised for use in showers, jetters and other similar equipment					✓		
Ensure that operatives who will be in contact with the dip haven't been advised by their doctors not to work with					✓		

Item	Day	Week	Month	Year	Prior to dip'n	After dip'n	Where are maintenance instructions?
compounds containing organophosphate (OP) chemicals.							
Ensure records of discharge of dip are kept ensuring compliance with your permit.						✓	
Ensure all pipes and transportation equipment e.g. vacuum tankers are free from leaks.					✓		
Ensure appropriate Personal Protective Equipment is available for workers involved with the dipping. For example, non-lined synthetic rubber gloves, face shield, wellington boots and so on.					✓		
If spreading conditions are unsuitable or if any other factors are present which may prevent the prompt disposal of used dip it must not be stored in the dipping bath. It must be stored carefully in impermeable containers designed to store such toxic materials. These containers must then be stored so that any spillage cannot enter any drain or run over adjoining land, or banded to contain any unforeseen spillage.						✓	
Ensure dipping bath is covered after each use.						✓	
Ensure all relevant actions/requirements are recorded						✓	

3 Maintenance record:

You need to keep a record of the checks you have completed, that are set out in your checklist, along with any additional checks you have made. This could be recorded in a diary or alternatively you could adapt the form below to create a record sheet. If you do these records, you should enter: The check or maintenance job done; Who did it; The result. Alternatively, you could use these forms. You will have to keep a good supply of them, for each line on your maintenance/operations checklist.

Date	By who?	Check done?	Result & action/s taken
e.g. 28-08-2018	T Rogers	Maintenance check: dip tub, drainage pens, slurry tanker, pipes, PPE, disposal field.	e.g. Tub water fill-pipe too long. Action = shorten pipe to ensure it does not cross-contaminate with dip in tub.

4 Purchase & Storage record

You must also keep dated **receipts** showing Landguard OP-A purchase.

Location = farm building; locked red fireproof farm chemical/pesticide banded cupboard & spill kit.

Complies to HSE Health and Safety Executive ***Guidance on storing pesticides for farmers and other professional users*** <http://www.hse.gov.uk/pubns/ais16.pdf>

The following is a list of liquids, powders and so on that are stored on site and could be harmful to the environment if they escape.

[Note – regularly checked storage record sheet within store cupboard - plus copy in farm house records]

Date bought / checked	Name of chemical / pesticide: a) name b) quantity c) batch no d) date expire	Checked by who?

5 Risk Assessment / Accident Management Plan - Accident management of near misses, accidents, or incidents

1. **Accident management and records of near misses, accidents or incidents** (as Natural Resources Wales - Management System template for operators who have a permit to discharge used or waste sheep dip to land, p.5)
 - A. **Site plan map – identifying vulnerable receptors** – (p.1 of this Management System doc)
 - B. **Risk Assessment & Preventing accidents** – (pp.7-9 of this Management System doc)
 - i. **Spill response procedure** (p.10 of this management system doc)
 - C. **Key site and emergency contacts** (p.14 of this Management System doc)

B. Risk assessment and prevention of accidents

The following table contains some of the potential environmental risks relating to a registered facility with a permit to discharge enzyme treated dip. It is not exhaustive so you should also consider if there is anything particular to your site that could cause a problem.

Read the table thoroughly. Some points may not apply to your activity and please add any site-specific issues to the list. The table also describes what you ought to be doing to reduce the risk of an accident and what should be done if one occurs.

Please ensure that you are committed to the table's contents as it forms part of your **Environmental Management System** which is a condition of your permit and therefore must be complied with.

You will need to develop a **spill response procedure** to ensure that any spillages are dealt with correctly. This should be attached to this document.

Please ensure spill kits and any other equipment referred to is readily available.

Finally make sure that any contractors or farm workers know about the plan, where to find it, and what it contains. It is important that they know how to prevent accidents and what to do should an accident occur.

Remember, if an accident does happen, follow the plan in this table.

You may need to review this accident management plan following an incident, accident, or if Natural Resources Wales asks you to do so.

Risk Assessment - Possible accident	What would the harm be?	How do we reduce the risk – prevent chances of it happening?	Action plan – what to do if it happens
Spillage - during transfer, of the sheep dip to the farm	Contamination of land, drains, groundwater and watercourses.	Ensure dip and other chemicals are transported in a drip tray or similar container large enough to hold spillages and secured to avoid tipping.	Follow the spill response procedure . It describes what to do in the event of a spill and where the kit is kept. Environmental pollution must be reported to Natural Resources Wales
Spillage - of dip during storage before use	Contamination of land, drains, groundwater and watercourses.	Ensure that the sheep dip concentrate storage area is of sound construction, is well maintained and located where it is unlikely to be damaged by vehicles. Ensure dip is stored away from drains and in a secure tray or bund to contain any spillage. Store dip concentrate in a properly constructed farm chemical store or approved steel cabinet in accordance with HSE Agriculture Information Sheet A/S16.	Follow the spill response procedure : a) If spillages occur soak them up with an absorbent material and dispose of through a registered waste carrier. b) Environmental pollution must be reported to Natural Resources Wales
Spillage – overfilling slurry tanker	Contamination of land, drains, groundwater and watercourses.	Ensure the tanker is filled with either water or slurry before adding the waste or used dip. Ensure that you know the capacity of the tanker and that all pipes used to transfer the dip from the bath to the tanker are free of leaks.	Follow spill response procedure.
Leakage - due to faulty pipe work, holes in the dipping bath and so on.	Contamination of land, drains, groundwater and watercourses.	Follow Report 2 above - Maintenance/checklist actions (pp.4-5) prior to dipping. i.e. Visual inspection of the dipping bath, pipe work and vacuum tanker, slurry tanker prior to use. Testing of the integrity of the dipping bath and pipe work by running	Follow spill response procedure.

Risk Assessment - Possible accident	What would the harm be?	How do we reduce the risk – prevent chances of it happening?	Action plan – what to do if it happens
		water through them prior to dip and completion of inspection checklist. Preventative maintenance regime.	
Weather - Inappropriate conditions Spreading dip onto frozen, waterlogged or cracked land	Runoff of dip into local water courses or pollution of groundwater.	Dip must only be spread onto land which is in an appropriate condition to receive it.	In the event of unsuitable spreading conditions store the dip securely in an appropriate container until spreading can occur.
Sheep risks – e.g. Dipped Sheep escaping from the holding pen and running through watercourses, over boreholes, springs and so on.	Runoff of dip into local water courses or pollution of groundwater.	Ensure fencing is adequate so sheep cannot escape.	Gather sheep into appropriate facilities and inform Natural Resources Wales.
People risks e.g. Staff knowledge and skill – staff not knowing how to dip sheep or risk and safety measures with handling sheep dip.	Contamination of land, drains, groundwater and watercourses.	Ensure staff are trained and qualified to handle sheep dip and are aware of the farms sheep dip management system and risk assessment and prevention measures, including spillage procedure and key emergency contact details.	Do not allow to happen – only handle sheep dip containers, sheep dipping, and spreading of diluted sheep dip waste (3:1) with trained person doing or supervising.
People risks – e.g. sheep dip contamination by splashed with sheep dip or fall in dip tub.	Illness and injury and contamination of of land, drains, groundwater and watercourses.	Ensure sheep dip handling facilities are safe for people to use, people use appropriate PPE Personal Protection Equipment, and ensure people are trained in the safe use of sheep dip and sheep dipping.	Wash off with clean water immediately (run off into dip tub); Follow spill response procedure and take person to Dr or Hospital if necessary. Complete accident report & notify Health and Safety Executive if necessary.
Others to add as planned ...			

5.B.i. Spill response procedure

1. **Spill kit =**
 - a. water to safely dilute any splash or leakage - at bunded storage cupboard & at dip tub when dipping. Dispose of as licence directs to dispose of sheep dip waste. [licence applied for].
 - b. appropriate 'soak-up' absorbent sheets - available at bunded storage cupboard & at dip tub when dipping
2. If spillages occur, soak them up with an absorbent material and dispose of through a registered waste carrier.
3. Environmental pollution must be reported to Natural Resources Wales.
4. Thoroughly wash off any sheep dip equipment (e.g. PPE or finished container) at least three times until clean – and ensure run off into dip tub and dispose of sheep dip waste as licence directs [licence applied for].

7. Record of accidents, incidents, or near misses.

This form is to be used for reporting things that could impact on the environment, for example: spillage of polluting liquids onto the ground, into a drain or a watercourse. "Other incidents" covers impacts on the environment that are not accidents, such as failing to empty the dipping bath and it being filled up by rain and over flowing causing an uncontrolled release of a list 1 substance to ground.

It is good practice to record near misses – for example, there was a leak in one of the sheep dip containers, but it was stored in an approved steel cabinet, so all the dip was captured.

Date / time of incident?	What happened?	Pollution Yes/No? If Yes, notify NRW 0300 065 3000 ASAP	Cause? (Need qualified person to identify?)	Witness name?	How fixed? & how prevent in future?	If telephoned NRW – time and reference number of phone call.	Your name & signature

Date / time of incident?	What happened?	Pollution Yes/No? If Yes, notify NRW 0300 065 3000 ASAP	Cause? (Need qualified person to identify?)	Witness name?	How fixed? & how prevent in future?	If telephoned NRW – time and reference number of phone call.	Your name & signature

Continue a separate sheet if you do not have enough room.

Keep the completed form in the file to discuss with Natural Resources Wales when they visit.

8 a Training needs

Training need		farmer	farm worker
Environment awareness	Certificate of competence in safe use of sheep dip	✓	✓
	Safe disposal of sheep dip	✓	✓
	Check weather forecasts for rain	✓	✓
	Aware of Risk assessment & accident management plan	✓	✓
Maintenance awareness	Aware of maintenance checklist prior to dipping	✓	✓
Operation awareness	Sheep dip operations: including mixing volumes, sheep welfare / infections/ injury, length of time in dipping pen etc.	✓	✓
Accident and emergency procedures awareness	Spill response procedure	✓	✓
	Dipping procedure	✓	✓
	Health and safety procedures e.g. PPE requirements	✓	✓
	Emergency & accident procedures & key contact numbers	✓	✓

8 b. Training record

As farm inspection - training record & copy of certificates in farm house records.

Name:

Job:

Training required	Date due	Date taken	Passed Y/N	Reviewer signature	Refresher date?	Comments

9 Complaints record

Date:	Who made the complaint? Name:
Their address:	
Their phone number:	
What was the complaint about? / What happened?	
Was anyone else aware of this – other neighbours or your staff? If so who?	
Assuming the complaint relates to your site, what was the problem, what went wrong?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example: odour or spillage of polluting liquids onto the ground into a drain or a watercourse?	
If there was then you must notify Natural Resources Wales on 0300 065 3000 ASAP . Have you done so? Yes/No/not applicable At what time did you phone? EA incident number?	
You must also write or send an email to confirm this to the local office (see your accident management plan for the address: Environment Team North Powys / Tim Amgylchedd Gogledd Powys <environmentteam.northpowys@cyfoethnaturiolcymru.gov.uk> Have you done so? Yes/No/not applicable	
Please print your name and sign:	

Continue on a separate sheet if you do not have enough room.

Keep the completed form in the file to discuss with Natural Resources Wales when they visit.

5. C – Key Site and Emergency Contacts

This table contains information and contacts you may need in an emergency:

SITE DETAILS		
Location: Glanhirin Elan Valley Rhayader Powys		
Postcode: LD6 5HS		
Site Access Grid Reference: (entrance to farm): SN86859 72194		
SITE CONTACTS	Office hours(specify)	Out of hours
Glanhirin Farm house	01597 810 973	01597 810 973
Tenant farmer – Tanya Rogers	01597 810 973	01597 810 973
Landlord – Elan Trust	01597 810449	01597 810 449
EMERGENCY CONTACTS		
Emergency: MEDICAL, FIRE, POLICE	999	999
Rhayader Dr Surgery	01597 810 231	01597 810 231
REGULATORS		
Health and Safety Executive (HSE)	0300 003 1647	0300 003 1647
Powys Local Authority	01597 826 000	01597 826 000
Environmental Pollution - Natural Resources Wales	0300 065 3000	0300 065 3000
UK Environmental Agency (24-hour emergency hotline)	0800 80 70 60	0800 80 70 60
UTILITY SERVICES: Farm is off-grid.		
Farm electric supply = off grid / private		
Farm gas = Off grid / private FloGas LPG EMERGENCY NUMBER	03457 200 100	03457 200 100
Farm water supply = Off grid / private		
OTHER CONACTS		
Adjacent landowners: ELAN TRUST	01597 810 449	01597 810 449
Neighbour farm: Aberglanhirin	01597 810 480	01597 810 480