

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

Site	Sandycroft Poultry Processing	Permit Ref	YP3632EM		
Operator/Permit holder	2 Sisters Food Group Limited				
Regime	Installations				
Date of assessment	15/06/2020	Time in	14:40	Out	15:40
Assessment type	Site Inspection				
Parts of the permit assessed	Odour Control				
Lead officer's name	Ross, Stuart				
Accompanied by					
Recipient's name/position	Steven Van Der Keift/ HS&E Manager	Date issued	03/07/2020		

### 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
B1 - Infrastructure - Engineering for prevention and control of emissions	C3	2.4.5
F1 - Amenity - Odour	C3	2.2.6

**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.

<b>Number of breaches recorded</b>	<b>2</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>8</b>
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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

This Compliance Assessment Report follows an unannounced site inspection 15/06/20 made in response to a number of odour complaints from local residents as received via NRW's incident hotline. It also covers a subsequent planned 'follow up' inspection 24/06/2020 between 14:20 and 15:20.

### **15/06/20**

On 15/06/20 odour was assessed down wind of the site in the general vicinity of Bernsdale Close, Hamilton Avenue and Phoenix Street. An occasional mild odour from the abattoir was detected (difficult to describe). An assessment was then made on Glendale Avenue over a cumulative period of approximately 1 hour and ranged from a mild lairage / live bird odour near the factory entrance to an intermittent pungent (offensive) but often short lived smell from the rear of the factory.

An onsite inspection was completed 14:40 - 15:40 and the findings, non compliance and associated remedial actions are as follows;

#### **1. Blood Tank Pressure Relief / Vacuum Valve**

The pressure relieve valve (PRV) was found to be in the open position and was actively venting blood odour that has the potential to cause an offsite odour impact (blood is typically highly odorous). Blood odour was certainly detected on the gantry at the top of the tank and at ground level in the same area. A site operative checked the valve in the presence of NRW and re-seated it preventing further release, indicating that the valve was 'stuck' open after a previous tank pressurisation event.

The operator, 2 Sisters Food Group Ltd (2SFG) subsequently inspected the PRV and identified 'no visible defects' but the spring was changed with a like for like replacement. The operator reports that the pressure relief valve is checked every Sunday as part of a PM task and checked for any odour as part of the blood transfer protocol ZAN002.

Subsequent to the incident, no evidence of a blockage was reportedly found when the line connecting the blood tank to the packed column scrubber was flushed through with air. It was reported that there were no valves positioned incorrectly to block the air to the scrubber but as a risk reduction 2SFG can remove the isolation handle from the valve that feeds from the scrubber to the blood tank.

2SFG report that there have been no changes to the blood transfer pump that may have led to the rate of blood tank loading to have increased that would potentially cause blood tank pressure to exceed the normal pressure and cause the PRV to activate. 2SFG report that the pump is being replaced as part of a process of elimination.

The root cause of the pressure relieve valve being in the open position has not been established to date (refer action 1 below).

As a precaution 2SFG have installed a connection between the PRV vent and the main packed column scrubber, designed to collect odour in the event of PRV activation. However NRW stresses that the PRV / vacuum valve is a safety critical device and given that the root cause of the valve being in the open position has not been established it must be thoroughly inspected to ensure its reliable operation and verified that it activates at the required pressures.

The emission is a breach of condition 2.3.5 (CCS3) and you have been issued with a warning.

**ACTION 1** - As proposed, 2SFG to arrange for a third party (insurer) to inspect the condition and operation of the valve and to take any necessary actions thereafter (including replacement if required) to ensure the valve operates effectively, activates only at the required pressure and re-seats. Please notify NRW of the outcome of these matters by 31/07/20.

#### **2. Effluent Sump**

An inspection of the effluent sump area (adjacent to / under the blood tank) identified a strong offensive odour released from partially open covers / holes in the concrete slab covering the sump. Numerous pipes and services (cables etc) enter the sump and the seal on these appeared to be poor/absent in several areas providing pathways for odour to be released.

The emission is a breach of condition 2.2.6. (CCS3) and you have been issued with a warning.

2SFG subsequently confirmed that a gasket seal was fitted as a short term measure but that this area will be further reviewed to establish what improvements can be made. During the inspection 24/06/20 it was confirmed that odour had significantly reduced in this area but there are further potential options to improve odour control on this sump.

The odour control measures for this sump need to be revised and a proposal put forward to NRW for improvement. This needs to include measures to prevent the release of odour from the sump and abatement of displaced air due to effluent level changes

Refer action 4 below re. Odour Review.

### **3. Effluent Screen**

Several dirty/soiled Dolavs adjacent to the effluent plant screen.

It was also observed that the drain adjacent to the effluent screen had apparently blocked causing unknown offensive smelling liquids to pond in the bund.

There is a breach of condition 2.2.6. (CCS3) and you have been issued with a warning (consolidated with the score above)..

2SFG have acknowledged that the 'bins' should have been cleaner, that area was cleaned. New dolavs with lids had been ordered as those in place are worn.

It was reported that the sump pump had become blocked with a piece of plastic.

During the inspection 24/06/20 the worn dolavs were still in use (pending replacement) but were in much better condition in terms of soiling. The drain has been unblocked and no liquids were ponding in this area.

**ACTION 2** - ensure worn dolavs are replaced and cleaning procedures .staff training are reviewed to prevent a recurrence. Provide NRW with a summary of you actions by 31/07/20.

Also refer action 4 below re. Odour Review.

### **4. Offal Storage - Refrigerated Trailer**

A refrigerated trailer positioned at the site boundary in the rear yard was dripping liquid that appeared to contain blood and this was ponding on the yard – potential to cause odour. It was reported that this a ongoing measure to store offal (e.g necks). It is not acceptable for this liquid to be ponding on the yard particularly adjacent to what appeared to be a surface water manhole chamber (painted blue).

**ACTION 3** - Potentially polluting liquids should be contained and directed to the foul drainage system. This operation does not form part of your permitted operating techniques and a proposal is required as to how these materials will be stored going forward and this will be subject to agreement with NRW. Please do so by 31/07/20.

During the inspection 24/06/20 no ponded liquid was present below the trailer.

**ACTION 4** - With the objective of preventing and minimising the release of fugitive odour emissions from the installation and to ensure permit compliance, 2SFG shall complete a review of the effectiveness of existing odour control systems (infrastructure, procedures and maintenance) and identify areas for improvement.

With regard to site infrastructure this may include better utilising the use of the existing odour control units to collect odorous air steams / fugitive emissions from process areas .e.g. effluent sump, cat 3 offal screen and other enclosures etc.

Provide NRW with a copy of your review findings and include proposed improvement items and associated timescales for implementation. Please do so by 14/08/20.

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0036742**

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

Site	Sandycroft Poultry Processing	Permit Ref	YP3632EM
Operator/Permit holder	2 Sisters Food Group Limited	Date	15/06/2020

### 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.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

### 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			
B1	C3	Refer details section	31/07/2020
F1	C3	Refer details section	31/07/2020

## 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.