

## Compliance Assessment Report CAR\_NRW0038294

**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 carried out:** Site Inspection, Reason: Routine.

On 12/05/2021 between 09:50 and 11:35.

Parts of permit assessed: Various

**NRW Lead Officer:** Rebecca Harwood.

**Report sent to:** Tim Howell, Group Operations Manager on 21/05/2021.

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

| Part of permitted activity assessed (criteria)                        | Assessment result | Permit condition |
|-----------------------------------------------------------------------|-------------------|------------------|
| B3 - Infrastructure - Site drainage engineering (clean and foul)      | Assessed (A)      |                  |
| B4 - Infrastructure - Containment of stored materials                 | Assessed (A)      |                  |
| B5 - Infrastructure - Plant and equipment                             | Assessed (A)      |                  |
| C3 - General Management - Materials acceptance                        | Assessed (A)      |                  |
| C4 - General Management - Storage, handling labelling and Segregation | Assessed (A)      |                  |
| F1 - Amenity - Odour                                                  | Action only (X)   |                  |

Result types are explained in more detail in the 'Important Information' section below.

| Total number of 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 |
|----------|------------------------------------------------------------------------|-------------|
| F1       | Please forward the latest version of your Odour Management Plan to NRW | 30/06/2021  |

Action 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 follows a routine inspection of the site undertaken on 12 May 2021.

A short meeting was held with the Operations Manager and Quality Assurance Manager who provided an overview of site operations, how the plant is operated, and the processes involved (a process steps flow diagram was provided). A familiarisation tour of the facility was then conducted, following the process from beginning to end. During this time I carried out a visual inspection of the feed mill, warehouse and vehicle wash area.

At the time of the visit articulated vehicles were observed collecting the feed from the despatch area and oil seed rape was observed being delivered at the rear of the Mill Building.

Vehicle wash area – the Operator stated that the interceptor had been cleaned on Monday 10 May. The diesel tanks in this area were bunded. No further issues were identified within the wash down area.

IBC storage – previous inspections had identified issues with the bunded containment of liquids. Oil was being stored in a separate container adjacent to the wash down area and was all bunded. A number of IBCs were being stored in a red unit at the rear of the site (identified as IBC storage on the Site Layout Plan in Schedule 7 of the permit). I queried whether there was enough containment within this if the unit had been full of IBCs and they failed.

**Advice and Guidance:** The operator is to satisfy themselves that the storage capacity of the unit is adequate to contain any leaks if it was full and the IBCs failed.

The operator raised a query as to whether the current tank containing rhodimet could be repurposed for soya oil (a new tank was being provided for the storage of rhodimet). I advised that the existing tank would need to be pressure tested before being used to ensure that any leaks or weak seals could be identified.

**Advice and Guidance:** If the Operator chooses to reuse the existing rhodimet tank it should be thoroughly cleaned and pressure tested prior to use.

Inside the building there is a complex network of covered conveyor belts linking the various silos. These appeared to be well maintained and working correctly during the visit.

An odour could be detected on site at the time of the visit and was linked to the facility. I noted that it could also be detected outside of the boundary of the facility once I had left site. To date no odour complaints have been received in the vicinity of the facility.

**Action:** Please forward the latest version of your Odour Management Plan to NRW by 30 June 2021.

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.

### **What are suspended scores?**

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 and Waste action criteria** (used in section 1 and 2):

#### **A: Permitted activities**

- A1 Specified by permit

#### **B: Infrastructure**

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

#### **C: General management**

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

#### **D: Incident management**

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

#### **E: Emissions**

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

#### **F: Amenity**

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

#### **G: Monitoring and records, maintenance and reporting**

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

#### **H: Resources efficiency**

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

## Enforcement response

Any permit condition non-compliance 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 20 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 – 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.