

Compliance Assessment Report CAR_NRW0038950

Permit being assessed: BV9683IH.

For: Teifi Park Abbatoir EPR/BV9683IH, held by Dunbia UK

At: Teify Park , LLANYBYDDER, Carmarthenshire, SA40 9QE.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 21/10/2021 between 10:30 and 15:30.

Parts of permit assessed: Please see details

NRW Lead Officer: Ieuan Davies, accompanied by Lee Mills.

Report sent to: Luke Healy, EHS Manager on 19/11/2021.

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)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
E3 - Emissions - Surface water	Assessed (A)	

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?

No action required.

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

Attendees

- Luke Healy – EHS Department (Dunbia Llanybydder)

- Victoria Kerr (via video link) - EHS Department (Dunbia Llanybydder)
- Ieuan Davies – Industry Regulation Officer (Natural Resources Wales)
- Lee Mills – Industry Regulation Officer (Natural Resources Wales)

Introduction

This Compliance Assessment Report was completed following the site visit undertaken by Ieuan Davies and Lee Mills on the 21st October 2021. A meeting was prearranged to provide Ieuan Davies (Natural Resources Wales), the facilities regulatory Officer, a site overview, tour & an opportunity to discuss management procedures pertaining to odour and point source emissions to water. An agenda was shared with the operators ahead of the site visit. Dunbia (UK) provided a copy of their updated Odour Management Plan (Document Ref: LLA-ENV33 Issue Date: 06/07/2021). This plan included amendments of potential odour sources linked to the introduction of the beef extension.

Odour Management Plan

The Operator within their environmental permit have a condition to minimise any odour offsite to levels below 'a level likely to cause pollution' as can be seen below:

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

The Installation has a history of odour complaints. However, complaints have been infrequent during 2020/21. NRW received 3 complaints stating odour perceived to be coming from the abattoir over a two to three week period during the end of August and beginning of September. The complaints were unsubstantiated and there have been no odour complaints made against site since.

Weather Station

In previous correspondence Dunbia (UK) made NRW aware that the current weather station was out of action due to breakdown of certain component/s. Dunbia (UK) during the meeting stated that a new external unit had been ordered and on delivery the unit will be in working order by November 2021. **Recommendation: Notify NRW when the weather station is back in working order.** Dunbia (UK) also stated that energy usage has historically been measured in direct comparison with product throughput. The Operator propose to factor in data collected by the weather station to better understand and reflect external factors i.e inclement weather on energy usage to further develop a better understanding of energy efficiency at the facility.

Site Tour

The inspector took a guided tour of the permitted installation and view current operations. On the tour a number of areas were viewed and assessed (Olfactory Boundary Assessment locations, areas mentioned in Section 3.0 Control Measures To Prevent and Control Odour of Dunbia (UK) OMP, Emission points W1 (WQ sample location), W2 & S1) with subsequent discussion to be found in the following sections.

The weather conditions during the site tour were unsettled with a moderate wind and occasionally heavy rain.

There are several potential sources of odour for example the skin shed and the effluent treatment plant.

The facility operate the aforementioned odour management plan which details these potential sources of odour. The site was inspected on the day for likely sources and found to meet acceptable standards. However, please see following recommendations:

- During site inspection it was noted that the door to the Skins & hides processing area remained open for a prolonged period. Stood outside the building no odour was experienced, however, under different meteorological conditions the activity could give rise to an odour which may be observed beyond the site boundary. **Recommendation: Ensure steel roller shutter doors remain closed apart from when vehicular access is required as per section 3.8 of Dunbia (UK) OMP.**
- Several potential odour sources linked with the effluent treatment process can be found within the Effluent Treatment Plant (ETP) building. Within Dunbia (UK) OMP, one of the employed control measures for the treatment of wastewater units are stated as “....located within the ETP building”. The efficacy of this odour control measure will be reduced if the steel roller shutter doors at the ETP remained open for prolonged periods. However, on the day of inspection there was no odour experienced stood outside the ETP. Under different meteorological conditions the activity could give rise to an odour which may be observed beyond the site boundary. **Recommendation: Minimise the time and frequency in which the roller shutter doors are opened.**
- It was noted that there appeared to be a significant build-up of solids within the SPEL Tank on the day of inspection. **Recommendation: Evaluate efficacy of screens / catch pods used on production floor to minimise meat scraps/fats from entering drainage system and SPEL Tank.**

Drainage

NRW requested a copy of the current Drainage Plan for the facility which we have since received.

During the site inspection Luke Healy made NRW Officers aware of a number of updates required as part of the introduction of the beef extension. Namely, the T1 sump is no longer required and in time will be redirected to the new SPEL tank. The surface water drainage grated channel (named RG on Dunbia Drainage Plan) which runs from the Aeration & Anoxic Tanks towards the lairage access ramp is earmarked to be turned into a foul drainage channel which would be redirected to T4 reception chamber. NRW Officers were also made aware of a proposed Archimedes screw installation at T4 to remove solid matter from the tank.

NRW would like to be informed as and when the upgrades are completed and ensure that the drainage plan and OMP for the facility remains up to date.

It was noted that a disinfectant mat placed outside the skin shed was covering a section of foul drainage which could increase the likelihood of contaminated water to enter the surface water drainage and discharge to the environment via the facilities interceptor without appropriate treatment. **Recommendation: Ensure that any contaminated water from the Skins and hides shed is collected and channelled into the foul network for treatment via the ETP.**

Chemical Store Container

During the visit the condition of one of the chemical store containers was raised. The chemical store containers are located adjacent to a surface water line with attributed manholes. It was unclear on the day of inspection the condition of the secondary bunding of the container/s. **Recommendation: Assess integrity of secondary bunding of the chemical stores.**

W2 Emission Point

Emission point W2 was viewed at the end of the site tour to inspect the works undertaken to relocate the discharge point following the issues faced detailed in Compliance Assessment Report NRW0037846.

The outfall to the river was viewed with the following photograph showing the relocation of W2.



This emission point is approx. 100m away from the final effluent sampling point (W1) and is serviced by an underground pipe. Emission point W2 is on the property of a neighbouring estate. The effluent being discharged to the river was seen to be clear and without odour.

Dunbia (UK) had applied and received a varied EPR permit to reflect and formalise the change of location of emission point W2. The actions stated within Compliance Assessment Report NRW0037846 can now be classed as fulfilled.

Conclusion

This was the first visit since change of inspector, its purpose to familiarise the officer with site operations and establish links with the site management.

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 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.