

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

Site	Dolwen Abattoir EA/EPR/GP3235GH/V003				Permit Ref	GP3235GH		
Operator/ Permit holder	Randall Parker Foods							
Date	10/09/2014				Time in	12:00	Out	13:00
What parts of the permit were assessed	1.2.1, 1.3, 2.2.6, 2.2.7, 2.3.2, 2.3.7, 2.5, 2.6, 2.9,							
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op		Water Discharge	
Recipient's name/position	John Eversfield, Technical Manager							
Officer's name	Richard Taylor				Date issued	10/09/2014		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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

Condition(s) breached

a) Permitted activities	1. Specified by permit	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	A	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	A	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),

A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, 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 Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Natural Resources Wales investigated a complaint made against Randall Parker Foods on 29th August 2014 at 14.45 hrs. NIRS ref 01272564. The report was logged as land contamination by animal gut content, which was producing an unacceptable odour.

The site was contacted on 1st Sept 2014 by NRW, and provided daily waste sheets for the dates that 'lairage' had been taken to an area called Morfodian, West of Bedw. This area of landspreading lays approximately 1 mile NW of the Randall Parker foods site.

A check on the weather for the week through 'wunderground.com' revealed that 5mm of rain on the 25th was recorded for Llanidloes with temperatures of 23 deg C. Photographs of the land taken on spreading site show that the site is a sloping field.

It is NRW's opinion that landspreading should not have occurred on this field at this time due to the risk of rainwater pooling the waste at the bottom of the field, before releasing odour to the locality through the heat of the day. The weather conditions should have been foreseen by the waste contractor/operator and fewer loads tipped.

The site sent their 'waste disposal daily sheets' to NRW which recorded the time, date, destination and authorisation signature of the reported that they used a contractor to dispose of 'lairage'. This was identified as 'J.F. Morgan plant hire' using a vehicle driven by Alex Chapman. In the week prior to the complaint 6 loads were spread on 22nd Aug, 16 loads spread on 23rd, and a further 4 loads spread on the 27th. Quantities are not recorded on the waste sheets, neither is the EWC code. (This is an improvement item below at rec 3).

Permit condition 2.6.3 requires 'quantity, composition, destination, and removal date only. Note, the quantity expressed on the waste transfer sheets is not mentioned on the 'daily disposal day sheet'. This sheet originates from the waste contractor, so can not be used to prove that there is a breach of permit condition 2.6.3. Instead, the site needs to ensure that all waste transfers from site meet this permit requirement. This will be a topic on the next site audit.

The waste contractors waste carrier licence number is 'now/269359'. A check was carried out on the details of the licence holder and found to be currently valid and correct. Details can be found on the Environment agency website <http://epr.environment-agency.gov.uk/ePRInternet/searchregisters.aspx>

Initially the investigation centred on the odour experienced by the complainant. Site are not permitted to emit odour from their permitted site boundary. (in accordance with H4 Odour guidance document section 2.1) However, because material was taken off site for land spreading by a third party, this becomes the direct responsibility of the third party. The site still has a duty of care over the final destination of all its wastes, and should periodically audit their waste contractors to ensure they are compliant as part of the sites environmental management system. (recommendation 1).

As such, there has been no breach of permit condition identified against the site for this

complaint. However, a list of recommendations has been drawn up below to help the site to prevent future incidents.

Recommendation 1; Permit Condition 2.3.4 – Site shall carry out a review the waste carrier licences which are held by their waste contractors.

Recommendation 2; Site are to re-train waste contractors in the required standards expected by Randall parker Foods with reference to the EA's H4 guidance on odour and the waste framework directive, plus the links below.

<https://www.gov.uk/dealing-with-animal-by-products>

<https://www.gov.uk/manage-waste-on-land-guidance-for-land-managers>

<https://www.gov.uk/waste-exemption-u10-spreading-waste-to-benefit-agricultural-land>

Recommendation 3; Site to record what quantities, relevant description of the waste, plus the EWC code of all wastes leaving the site, including animal gut content onto all waste transfer notes.



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Section 3- Enforcement Response

Only one of the boxes below should be ticked

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.

X

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.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.

email: jfmorganplanthire@btinternet.com

Waste Carrier Reg No: NOW/269359

Ed

03 SEP 2014

22/08/14

Waste Disposal Day Sheet

Date: 11-08-2014

Site: Randall Parker Foods

Time on Site: 06:30

11.65A

Authorised Signature:

Time Off Site: 16:15pm

Authorised Signature:

[illegible]**Total Hours:**

$6\frac{1}{2}l$

Break:

Total Hours Worked: $6\frac{1}{2}l$

5.

Vat Reg: 351694639

Waste Carrier Reg No: NOW/269359

ALEX CHAPMAN

Waste Disposal Day Sheet

03 SEP 2014

Date: 23-08-14

Site: Randall Parker Foods

Time on Site: 08.10

Authorised Signature: *David Jones*

Time Off Site: 17.00

Authorised Signature: *David Jones*

Time Depart	Time Returned	Destination	Driver
08.19	08.38	MORFORDION	ALEX
08.50	09.09	MORFORDION	ALEX
09.21	09.38	MORFORDION	ALEX
09.59	10.08	MORFORDION	ALEX
10.20	10.37	MORFORDION	ALEX
10.49	11.09	MORFORDION	ALEX
11.20	11.40	MORFORDION	ALEX
12.05	12.50	MORFORDION	ALEX
13.00	13.21	MORFORDION	ALEX
13.31	13.50	MORFORDION	ALEX
14.05	14.26	MORFORDION	ALEX
14.40	14.58	MORFORDION	ALEX
15.09	15.28	MORFORDION	ALEX
15.38	15.55	MORFORDION	ALEX
16.08	16.23	MORFORDION	ALEX
16.30	16.51	MORFORDION	ALEX

Total Hours:

9 1/2

Break:

1/2

Total Hours Worked:

8 1/2

(16)

Vat Reg: 351694639

Waste Carrier Reg No: NOW/269359

Tyncoed, Llandinam, Powys, SY17 5AS

Tel: 01686688624

email: jfmorganplanthire@btinternet.com

Alex Chapman

Waste Disposal Day Sheet

03 SEP 2014

Date: 27-8-14

Site: Randall Parker Foods

Time on Site: 9.36

Authorised Signature: *[Signature]*

Time Off Site: 20.40

Authorised Signature: *[Signature]*

Time Depart	Time Returned	Destination	Driver
09.35	10.18	Rhysface	<i>[Signature]</i>
10.29	10.46		<i>[Signature]</i>
10.59	11.16		<i>[Signature]</i>
11.27	12.00		<i>[Signature]</i>
12.13	12.50		<i>[Signature]</i>
12.58	13.15		<i>[Signature]</i>
13.45	14.07		<i>[Signature]</i>
14.32	14.48		<i>[Signature]</i>
15.03	15.19		<i>[Signature]</i>
15.29	15.46		<i>[Signature]</i>
15.56	16.12		<i>[Signature]</i>
16.47 (TRUCKED)	17.08		
18.35	18.58	Mafedion	<i>[Signature]</i>
19.00	19.29		<i>[Signature]</i>
19.30	19.40		<i>[Signature]</i>
19.50	20.40	Finished	<i>[Signature]</i>

Total Hours:

11 h

Break:

$\frac{1}{2}$ h

Total Hours Worked:

10 $\frac{1}{2}$ h

(16)

