

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		14:40 16:30
Date	10/09/2014 (8/9/14)	Time in	14:00 Out 15:00
What parts of the permit were assessed	1.2, 1.3, 2.2, 2.2.4, 2.2.6, 2.3, 2.3.8,		
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	N	
	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	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	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.

An unannounced site visit took place on Monday 8th Sept between 14.40 and 16.30 hrs. The visit took place at 3 locations. The first was in the vicinity of the recent land spreading complaint (NIRS ref 01272564). The weather was dry, little wind, and temperatures approximately 22°C. No odour was present here, or any visible evidence of land spreading activity.

The second was at the home of the complainant located behind Randall Parker foods. The site is separated from the house by a single track lane which is screened off by a row of conifers. The complainants had several issues which they raised, which could be bracketed under noise, flies, and odour. It was observed that there was initially a tonal whine coming from the site, plus a deeper humming noise.

A few flies were present in the air, but there was no odour. Entering the house, there were a few flies present, no odour, but the sound of the generators from site was present with the doors closed. On the house patio between the site and the house, the noise of the generators and the tonal whine were at their loudest. In the view of the inspector, this was unpleasant and inhibiting for the household occupants, especially with the windows open, or outside in the garden. Flies were present in small quantities, (2-3), but internally there were fly strips filled with approximately 100 flies. In the opinion of the Inspector, it would be difficult to prove that the quantity of flies present was directly linked to the activities on site given that there is also a neighbouring farm, and the remote location of the site. Odour was detected in small wafts, not strong. It was noticeable, but again hard to prove the origin.

It was planned by the inspector to tackle noise generated by the site, especially the tonal whine, and re-introduce lines of communication for complaints to the site. The inspector signed into the guardroom at 15.45 and site staff were good enough to see him. These were the Works manager, the Environment manager and the Technical supervisor. The inspector led them around the back of the site where the tonal whine of the generator was heard loudest and discussed options. The site was asked to voluntarily abate the tonal whine either by relocating the generator to the South of the site, (so the sound would be attenuated by the buildings) or covering/maintaining/abating the noise at source. (Recommendation).

The site were also asked to look at managing the noise emitted from the site so that the hours between 11pm and 7am (unsociable hours) were best preserved. This means that all unnecessary equipment is turned off at the end of shift. This should also save the site money spent on running equipment that is not needed at the time. (Recommendation)

Also, the delivery of livestock often comes in metal trailers which bounce over the speed bumps in the yard causing excess noise in unsocial times. Site were asked to look at the possibility of taking these out to make the yard quieter, but without compromising health and safety issues on site. (Recommendation)

It was understood that the trucks loading in the yard needed power generators working. This was thought to be the source of the low humming noise. Without compromising the working nature of the site, the site were asked to only run the trailers which were actually needed when they are needed, and turn off any unnecessary equipment.

complaints procedure. Permit condition 2.3.8 deals with recording complaints made against the site. It is recommended that a system is in place for dealing with phoned in complaints. As well as walk in complaints. Walk in complaints would be complaints from neighbours dealt with initially at the guard house. A system needs to be in place here and in reception to record and forward these complaints. (Recommendation).

With these measures in place, it is thought that there would be a reduction in the amount of noise generated on site which is experienced by the neighbour's offsite. Putting these measures into place voluntarily would show the site is being proactive in managing its impact on the environment. The site should also see a slight reduction in running costs, and a drop in the number of complaints it receives.

The Inspector left site at 16.30.

Summary

1. Site to look at ways to abate the generation of the 'tonal whine' from the generator by relocation/covering/maintenance/replacement.
2. Site to minimise noise generation between 7am -11pm, between shifts and weekends by turning unnecessary equipment off, i.e., trailer generators.
3. Site to look at removing the speed bumps in the yard to reduce the noise from farmers trailers without compromising site health and safety.
4. Site to investigate whether current procedures are in place to handle complaints from phone calls and 'walk-ins'.
5. It is recommended that site feed back their actions against each recommendation to NRW by 1st October.

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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.

