Cyfoeth Naturiol Cymru
Natural Resources Wales

EPR Compliance Assessment Report

Report ID: GP3235GH/0214130

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	25/06/2014	Time in 10:00	Out 13:00
What parts of the permit were assessed	E1, 2.4.1.2, Bunds, Tanks, Training, Refrigerant		
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	08/07/2014

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.

ermit 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	A		
	5. Plant and equipment	A		
c) General management	1. Staff competency/ training	A		
	2. Management system & operating procedures	A		
	3. Materials acceptance	N		
	4. Storage handling, labelling, segregation	A		
d) Incident management	1. Site security	A		
	2. Accident, emergency & incident planning	N		
e) Emissions	1. Air	N		
	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	A		
	4. Pests, birds & scavengers	A		
	5. Deposits on road	A		
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A		
	2. Records of activity, site diary, journal & events	A		
	3. Maintenance records	A		
	4. Reporting & notification	A		
h) Resource efficiency	1. Efficient use of raw materials	N		
	2. Energy	N		

SENT TO PUBLIC REGISTER 15 JUL 2014 NRW

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

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.

Site annual Inspection 25th June 2014

Personnel present – John Eversfield, Technical Manager; Phil Gillon, EH&S, Richard Taylor, Natural Resources Wales (NRW).

Areas covered.

1. Calculation of the E1 form submitted 28 Jan 2014. The method of calculation used for this submission was examined in detail. This was then changed to a standardised procedure using the methodology stated in 'How to comply with your environmental permit', using conversion factors derived from the latest edition of the 'Digestate of UK energy statistics DUKES. Recommendation 1; Site to use these two documents for future reporting.

2. Permit condition 2.4.1.2. Periodic waste minimisation and water use efficiency audits was examined. The site has several water saving projects underway, and manages its waste so that zero goes to landfill. This is seen as very proactive by NRW. However, there is a requirement in the permit YP3539SX to provide periodic reports. NRW are satisfied that the site have provided the necessary figures for reporting in these annual returns and PI reports. The permit asks for specific waste and water reports to be submitted following a period of time of not more than 4 year intervals. The report(s) are to follow scheduled audits written into the site EMS system. The submissions for 2014 were accepted on condition that the site schedule in the necessary audit(s) and submit the required reports within 4 years of the last submission – 9th May 2018. (This is a recommendation sent to site in CAR form GP3235GH/0212020 dated 19th June 2014).

3. Bunds and tanks – These are inspected daily and signed for in a logbook which was viewed on the day and found to be operating well. The kerosene, diesel, and water slurry tanks were inspected and found to be operating as normal. Bunds are cleaned out periodically. The maintenance and inspection of the tanks and bunds are scheduled into the EMS system via the 'piranha' system of maintenance. The diesel tanks have been positioned in a new refuelling centre away from the main building. This was seen as a good move and should reduce the risk of spillage due to collision. The kerosene and diesel tanks are plastic in construction and are rented by the site. They are owned by Howells fuel oils. The diesel and kerosene tanks do not have a date for renewal on the tanks. They are fitted with gauges which show the contents of the outer skin (110% bund). They also have interior level sensors which beam the quantity to site via Howells through telemetry. As the site is responsible for any spillage which occurs from the tank it would be prudent to proactively know when the tanks are coming to the end of their life and need replacement, instead of having to respond reactively. Recommendation 3; Obtain the date when the tanks are due to be replaced. Schedule this into the EMS as a reminder, so that the site can arrange timely replacements.

Staff training records – These were examined and found to be following a comprehensive structured approach. An online training mechanism is in place to ensure that site staff get site specific environment training which is retaken on three year cycles. All staff get an induction package which has to be passed by attaining 85%. NRW see this as exemplary.

Refrigerant laws – Changes to the refrigerant gas laws are known by site staff. Plans are in place to replace R404 used on site. The F Gas log was inspected and found to be comprehensive, with records for R22 added on two occasions.

IBC's storage – IBC's are still stored outside within a concreted hard standing. This does not follow best practice. Recommendation 4; Place the IBC's in a secure roofed area with a raised sill around the edge to act as a secondary bunded area.

Water use figures. RT expressed concern that vehicle timing figures would encourage the user to simply repress the button if the vehicle was unfinished when the cycle stopped. PG explained that the system is controlled in such a manner that the operator gains a ticket to wash the vehicle from the main office and signs for it. A second ticket would have to be explained to management before being granted. This was seen as a proactive development for the site and has already contributed to a measurable reduction in wash water use.
Generally the site was clean and tidy, with no non compliances seen.

Summary of recommendations.

1; Site to use 'how to comply with your environmental permit' and follow links to latest DUKES statistics for future reporting.

2; Site to schedule in the necessary audit(s) to satisfy pc 2.4.1.2, and submit the required reports within 4 years of the last submission – 9th May 2018.

3; Obtain the date when tanks are due for replacement from supplier. Schedule this into the EMS as a reminder, so that the site can proactively be engaged in timely replacements.

4; Recommendation 4; Place the IBC's in a secure roofed area with a raised sill around the edge to act as a secondary bunded area

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Operator/ Permit	Randall Parker Foods	Date	25/06/2014

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.