

	EPR Compliance Assessment Report		Report ID: GP3235GH/0240727			
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	03/06/2015			Time in	11:00	Out 15:00
What parts of the permit were assessed	4.1.4, 4.1.5, 4.1.7, site tour, management, reporting					
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge
Recipient's name/position	John Eversfield, Technical Manager					
Officer's name	Richard Taylor, Julia Frost			Date issued	11/06/2015	

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)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	N	
	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	A	
	2. Land & Groundwater	A	
	3. Surface water	A	
	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	N	
	3. Maintenance records	N	
	4. Reporting & notification	C4	4.1.5
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	1	Total compliance score (see section 5 for scoring scheme)	0.1
-----------------------------	---	--	-----

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.

The purpose of this CAR form is to record the events of the handover site visit made on 3rd June 2015.

Due to Natural Resources Wales internal reorganisation, the site of Randall Parker Foods has been reallocated to the North Wales team based in Buckley. This has meant a change of Inspector from Richard Taylor (SE) to Julia Frost (North), therefore the site inspection doubled up as the official handover. Present at the meeting were; John Eversfield (RP), Phil Gillon (RP), Chris Roper (RP), Julia Frost (NRW) and Richard Taylor (NRW).

The visit centred on a basic agenda which sought to clear up some outstanding issues prior to the handover.

P.c 4.1.4 - Fugitive emissions report – was due 31st Mar 2015. The site is required to submit a report to us detailing the type, quantity, and nature of any fugitive emissions made by the site during the previous year. Site were reminded to provide the report on 23 Apr 2015 by email (from RT). This was already outside the reporting deadline, but waived provided the site submitted the report for a new deadline of 31st May 2015. Site subsequently provided the report on time on 26th May. The report has now been reviewed, and further details are required for the report to be accepted as detailed in Action 1 below.

The detail of the 4.1.4 submission was hard to decipher and contained information which was not necessary for this report, such as the Introduction, the Scope, and the noise emissions prior to 2014. It also lacked detail on refrigerant losses, and nuisance flies. No quantification of either of the fugitive sources was made, i.e., Loss of refrigerant (type/quantity). Also the submission was not signed or dated, - the boxes were left blank. There was no overarching statement to say that there had been no fugitive emissions from the site. The reader had to read the whole document to arrive at this conclusion. For pc 4.1.4, a summary report is required to cover the site fugitive emission sources. These are emissions from non-permitted emission points. The fugitive emissions list found at 'How to comply with your environmental permit' – page 27. Nil emissions should be reported as nil returns under each heading. Site should report all fugitive emissions detailed in the original site permit application with regards to the latest BAT standards from the Food and drink sector BREF. Example heading are, noise, odour, spills, refrigerant losses, pests (flies), dust, and accidental releases/fire clean up materials. Quantification of the releases should be estimated in m3 where possible. Details of complaints should be kept to time, date, nature of complaint, source of complaint, date of actions closed.

Action 1. Site to resubmit the report by 1st July 2015 to include as a minimum a signed and dated section, a quantification of refrigerant gases lost during 2014, and a paragraph on fly minimisation techniques employed at the site.

2. Pc 4.1.5 requires a summary report on any identified improvements in the site EMS. The original submission was due on 31st Jan 2015, but received on 27 Feb 2015. A late reporting penalty was waived on this occasion. Instead a reviewed submission was requested on Apr 23rd 2015 which gave a deadline of 31st May 2015 for the report to be submitted. An unaltered report was submitted on 28th May 2015. The original deadline extension to 31st May was made on the proviso that the resubmitted report reviewed the submission and included a list of targets which were identified for improvement prior to the start of 2014, and summarise your performance against them. As the second report submitted was the same as the report submitted earlier, a Cat 4 breach of permit condition 4.1.5 for late reporting.

Action 2 – Site to resubmit the pc 4.1.5 report by 1st July 2015 deadline to include what improvement items you identified prior to 2014 and your progress made against them.

3. Pc 4.1.7. Site protection and Monitoring plan (SPMP). This permit requirement is for a report to be submitted to us following a 2 yearly review of the SPMP. Our records show the last SPMP review occurred on Jan 10th 2013. Detailed improvements were made on that CAR form dated 10/01/2013 by previous

Officer Andi Kemp. Site should have submitted a revised report on 10th Jan 2015 to cover the 2 yearly review and report. No action will be taken at this time for late reporting provided the site meets the new reporting deadline.

Action 3– Site to submit a revised SPMP by 1st July 2015.

4. F Gas Regs. The site has a number of chiller units which are central to how the site operates. These fall under the F gas Regs, but also fall partially under EPR fugitive emissions reporting. Folders were produced on request and reviewed. These were for the units;

RPF 03 – gas type R22, last re-gas prior to Jan 1st 2015. Requires details of new gas type.

RPF 07 - gas type R22, last re-gas unknown. Requires details of new gas type.

RPF 08 – gas type ISCEON 404A – site needs to check if this is still legal under the F-gas Regs.

RPF 13 – gas type, not entered – requires update.

RPF 16 – gas type not listed – requires update.

Recommendation 1. Site to carry out a site refrigerant gas review - aligned with the requirements of the F-Gas Regs.

http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2014.150.01.0195.01.ENG

Site also needs to update their folder system so that the gases cited are the actual gases being used in the unit. Site to ensure that the F-Gas Regs are complied with. This will have the knock on benefit of helping the audit refrigerant losses for future pc 4.1.4 reporting.

5. Noise Issue – Site have carried out further voluntary improvements to the compressor house located on the Northern side of the site. This included a new door, internal wooden cladding, internal boxing of noisy components (metal), closing off gaps in the structure, and closing a large circular hole previously in the wall. Further improvements are scheduled such as raising the unit off the ground to reduce vibration from the unit. Also, rewire the trailer park to make all trailers run on electric. Also, site plans to convert the present salting shed into storage space. This should have the knock on effect of reducing site generated noise, and salt loading on the effluent.

A noise survey was previously carried out by Powys council inside the home of a local complainant. I have asked Powys council to take a re-test so that any improvement in noise reduction can be quantified (ref email sent to Paul Bufton from RT 08/06/2015). The results of this will determine if further actions will be needed.

NRW action - request Powys council to carry out a follow up noise assessment.

6. Site tour – The site tour took in the external parts of the process. No culling was occurring at the time of the inspection. The effluent treatment facility was seen, together with the salting's shed, compressor house, the back fence adjacent to the neighbouring property, the trailer park, security lodge, and around the fence line to the neighbouring properties. (House and farm).

NRW has the following comments to make;

Security lodge – The guard asked for NRW warrants, and booked us in and out of the site. This was good practice.

Effluent Treatment – No odour and clean at the time of the visit. A previous CAR form raised the issue of storing the ISO containers under a roof. Site reported that they will remove these containers to the new empty salting's shed. This was seen as a positive move.

Compressor house. The improvements mentioned above were seen in the context of their relationship to the complainant's location.

Trailer Park – at the time of the inspection a loud engine was running in the yard. It was explained that this was a temporary delivery, and thus exceptional by nature. It was understood that this would be reduced when all the electrical hook – ups are in place. The site was very clean and tidy, perhaps helped by the fact that the site was coming towards the end of their quiet period.

7. Recent documents received from site;

1. Pc 4.1.4 – Fugitive emissions report, due 31/03/15, received 26/05/15, rejected . Amended version

due 1st July 2015.

2. P.c 4.1.5 – EMS summary, due 31/01/15, received 27/02/15, rejected, re-submitted 28/05/15. Rejected, Cat 4 permit breach issued 08/06/15. Deadline for resubmission 1st July 2015.
3. Pc 4.1.7 – Due 10/01/15. Not received. New deadline 1st July 2015.

END



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

Site	Dolwen Abattoir EA/EPR/GP3235GH/V003	Permit	GP3235GH
Operator/ Permit	Randall Parker Foods	Date	03/06/2015

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			
G4	C4	Re issue EMS summary report by 1st July 2015 deadline	N/A

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.