

	EPR Compliance Assessment Report	Report ID: GP3235GH/0255979	
This form will report compliance with your permit as determined by an NRW officer			
Site	Dolwen Abattoir EPR/GP3235GH	Permit Ref	GP3235GH
Operator/ Permit holder	Randall Parker Foods		
Date	16/12/2015	Time in	Out
What parts of the permit were assessed	Monitoring Returns Q4 2015 and Annual 2015		
Assessment	Report/data review	EPR Activity:	Installation: X Waste Op: Water Discharge:
Recipient's name/position	Phil Gillon		
Officer's name	Julia Frost	Date issued	02/02/2016

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	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	N	
	2. Land & Groundwater	N	
	3. Surface water	C3	2.2.2.6
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	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	A	
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)	4
-----------------------------	---	--	---

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.

October - December 2015 Quarterly Returns W1

Received by Natural Resources Wales within the timescales specified in the permit. All results are below the specified emission limit values.

The suspended solid result for Dec is reported as 59 mg/l against a limit of 60 mg/l. It is recommended that the Operator adopts an internal trigger which is set below the permit limit. If this trigger is breached action could be taken to ensure that the permit limits are not breached.

Were any investigations carried out as to why the suspended solids were considerably higher than normal on this date (is this related to rainfall)?

The flow result for December is a lot higher than normally recorded. What is the reason for this increase, is it related to rainfall?

Please refer to comments in CAR form which covered the visit to site in November. It was recommended that the Operator reviews the existing system and removes clean and uncontaminated water from the effluent treatment plant, which is currently placing additional burden on the system.

Annual Returns - Waste Disposal R1, Water Usage WU1, Energy Usage E1, Performance Indicators PI1

Responses received within timescales required by the Permit.

Annual Returns - Mercury and Cadmium Mass Balance and Concentrations

Response received within timescales required by the Permit.

The response provided shows a significant exceedance in the mass balance for both mercury and cadmium, 1.371 and 11.69 grams respectively, against a limit of 0.1 grams. Breach of permit condition 2.2.2.6, CCS category 3.

The concentration for both metals is below the emission limit value in the permit.

It is noted that the mass balance for 2013 and 2014 were also in excess of the emission limit value in the permit.

Natural Resources Wales have the following comments:

- The technical specification for the ferric sulphate solution has been provided to Natural Resources Wales. The Operator states that this chemical has been supplied by the current manufacturer since February 2013

- Arsenic, cadmium, chromium, mercury, nickel, lead, antimony, selenium, manganese and iron are listed as present in the solution
- What was the technical specification of the ferric sulphate solution used prior to this one?
- What investigations have been made into alternative suppliers for a "cleaner" ferric sulphate solution?
- The Operator shall review whether the use of the relevant chemicals has altered over the last few years
- The technical specification includes maximum quantities of a number of metals. Has the Operator ever analysed the chemical to assess the actual concentration of the metals listed above?
- Section 6 of your permit states that *"An allowance may be deducted for any proportion of the chemicals used that can be demonstrated not to have reached the emission point"*. It is likely that some of the metals are removed in the effluent treatment plant and would therefore be present in the sludge
- The last few years of sludge analyses should be reviewed to assess if there is any removal of the metals, listed above, contained in the chemical from the effluent
- If there is, the Operator shall provide a demonstration and re-calculate the mass balance for mercury and cadmium
- The Operator shall ensure that a procedure is included in the updated EMS to secure compliance with this permit condition
- What controls are in place with respect to the use of chemicals on site / introduction of new chemicals to ensure compliance with the permit conditions?

A report detailing the findings of this review shall be submitted to Natural Resources Wales by 31 March 2016.

Fugitives Emissions Review

Received by Natural Resources Wales within the timescales required by the Permit.

	EPR Compliance Assessment Report	Report ID: GP3235GH/0255979
This form will report compliance with your permit as determined by an NRW officer		
Site	Dolwen Abattoir EPR/GP3235GH	Permit GP3235GH
Operator/ Permit	Randall Parker Foods	Date 16/12/2015

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.	
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.	X
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			
E3	C3	Carry out the review detailed in the CAR form.	31/03/2016

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.