Compliance Assessment Report

Report ID: CAR_NRW0026767

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				
Regime	Installations				
Date of assessment	12/12/2016	Time in	10:25	Out	15:40
Assessment type	Audit				
Parts of the permit assessed	EMS				
Lead officer's name	Frost, Julia				
Accompanied by	McGregor-Andrew, Sian				
Recipient's name/position	Gareth Gower/ Technical Manager	Date issued	04/01/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). 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	CCS Category	Condition(s) breached
C2 - Infrastructure - Management system and operating procedures	A	
E3 - Infrastructure - Surface water	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0

If the Number of breaches recorded is greater than zero, please see Section 3 for 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 (eg. 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 advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

An audit was carried out to assess the Environmental Management System (EMS) produced as a result of the improvement plan agreed in 2015.

1.1.1 Written Management System

The EMS has been completely re-written, with the new procedures implemented in May 2016.

A number of minor recommendations were made on the procedures reviewed. The main points discussed included:

- There is repetition between some of the procedures. It was recommended that some of the procedures could be merged into one, or reference made to the other procedures linked to the one being used
- The Operator should ensure that appropriate deputies are assigned where relevant.
- A list of what should be contained in the spill kit is included on the lid of the relevant bin
- NRW out of hours hotline number is changing to 03000 65 3000
- The procedures relating to the discharge refer to the emission limit values (ELV) in the permit. It is recommended that the Operator sets internal trigger limits which give them time to react to stop a permit ELV breach.
- A schedule should be produced which shows the submissions required to NRW (including as a result of a site visit, part B to follow part A, as well as monitoring returns / improvement conditions), it should also detail when they have been submitted.

As well as a new EMS, there has been a complete change in personnel on site dealing with environmental issues, other than the Site Manager, over the last 6 months. The Environmental Committee meet on a regular basis. A Technical Supervisor role now exists, with the role of assisting the other Environmental Committee Members with the maintenance and auditing of the sites' EMS.
The Operator does not propose to have the EMS externally accredited at this stage. The main target for 2016 was to get the new EMS implemented and to ensure that the Environmental Committee have a thorough understanding of the environmental permit. Targets for environmental improvements will be set in 2017.
Significant improvements have been made and the system is well structured. The EMS is being treated as a live document (as it should) and a number of updates and improvements have already been made.
A "New Projects" procedure exists, which includes an assessment of environmental issues and potential impact on permit compliance at an early stage.

Training

Training is documented and kept in a file. Environmental Training course has been drafted and is due to be given to relevant staff in Jan 2017. The contents of this training have been reviewed and as an overview to cover the existence of a permit on site it appears adequate. It is recommended that this is rolled out to all staff and not just as part of the induction of new staff.

Whilst a lot of training has taken place the site have not carried out a "training needs assessment" - to review what environmental training is relevant to what role on site. This assessment will be carried out by the end of February 2017.

Once this assessment has been carried out it is recommended that the dates of training completed are held electronically, which will make it easier for the Operator to review ongoing training / refresher training needs.

Maintenance

The Operator has committed to review the equipment on site and produce an Environmental Critical Equipment list by the end of February 2017. It is recommended that, for each piece of equipment highlighted by this list, the Operator shall document the response required should the equipment fail and also any response times agreed with the relevant contractor / suppliers in the event of a breakdown.

Planned maintenance is scheduled and documented.

The environmentally critical equipment list and maintenance records will be assessed fully in future visits to site.

EP OPRA Spreadsheet

The Operator shall review the EP OPRA spreadsheet and send an updated version to NRW by the end of January 2017.

Effluent Treatment Plant (ETP)

Tom Williams, the ETP operator was available on site to describe the treatment process. No discharge was being made from the ETP to the river at the time of the visit due to a problem with the two effluent lagoons, which had recently become septic as a result of die-back of the reeds around the pond edges. The discharge from the lagoons to the river has been blocked while works are carried out to remove the decayed vegetation and build-up of sludge.

This work was due to be completed by the end of the year, (since the audit confirmation has been received that the work has been completed and that the effluent is within the permit limits and discharge has commenced).

pH and ammonia of the effluent are monitored on site daily. The pH meter is calibrated weekly using buffer solutions on site, and the ammonia photometer (Palintest) is calibrated annually by the manufacturer and has been sent for and passed calibration testing within the last few months.

The MCerts certificate in the office at the ETP had expired. The Operator confirmed it had been renewed. Please provide a copy of the updated certificate by 13 Jan 2017.

General

The recently issued permit refers to the original application submitted by Hamer International Ltd in the Operating Techniques section. The Operator shall review all aspects of the application to ensure that it is still valid, by end February 2017. NRW shall be notified of any changes to these techniques, as per condition 2.3.1, so that it can be assessed whether a permit variation is required.

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Section 3 – Enforcement Response
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.

Section 4 – Action(s)			
This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.			
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 verbally or 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 that 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 fulfil 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 (eg. 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
- Assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental 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 fifteen 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 officer's line managers using the informal appeals procedure. 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.

Welsh Language
If you would like this form in Welsh please contact your Regulatory Officer.