

Compliance Assessment Report

Report ID:
CAR_NRW0026695

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	23/11/2016	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	Monitoring Returns 2015				
Lead officer's name	Frost, Julia				
Accompanied by					
Recipient's name/position	Gareth Gower/ Technical Manager	Date issued	28/12/2016		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
E3 - Emissions - Surface water	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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
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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

Please note that this is an updated CAR form from the one issued on 02/02/2016.

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 December 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 (it 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 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 Usages E1, Performance Indicators PI1

Responses received within the timescales required by the Permit.

Fugitives Emission Review

Received by Natural Resources Wales within the timescales required by the permit

Annual Returns - Mercury and Cadmium Mass Balance and Concentrations

A review has been carried out on the 2015 cadmium and mercury submissions required by permit condition 2.2.2.6 (this is now permit condition 3.1.3).

The initial return submitted by the Operator showed a breach of this permit condition. However upon further investigation it has been found that the submissions assumed that all of the metals were disposed of in the effluent and that no account had been made of the proportion of the metals that would be contained within the effluent treatment plant sludge.

The updated submissions show compliance with the permit condition.

The Operator shall ensure that their procedures are updated so that future submissions follow the agreed calculation.

The calculations assume that the volume of gut content entering the effluent treatment plant is the same as the volume of sludge produced at the effluent treatment plant. Whilst this is worst case, it is likely to be an over estimate and result in a higher contribution of metals for the gut content than actual. The Operator shall look into an alternative way of estimating the contribution of metal from the gut content for future years.

EPR Compliance Assessment Report

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Operator/Permit holder	Randall Parker Foods	Date	23/11/2016

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 reports 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 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.