

## Compliance Assessment Report

Report ID:  
CAR\_NRW0035144

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

Site	Llangefni prepared meats	Permit Ref	SP3430RL		
Operator/Permit holder	2 Sisters Food Group Limited				
Regime	Installations				
Date of assessment	10/04/2019	Time in	10:00	Out	14:00
Assessment type	Site Inspection				
Parts of the permit assessed	All				
Lead officer's name	Kelk, Matthew				
Accompanied by	McGregor-Andrew, Sian				
Recipient's name/position	Rob Williams/ HSE Manager	Date issued	03/06/2019		

### 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
B1 - Infrastructure - Engineering for prevention and control of emissions	C3	2.3.5
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
E2 - Emissions - Land and groundwater	C3	2.2.5.1
E3 - Emissions - Surface water	C3	2.2.2.3
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	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	3	Total compliance score (see section 5 for scoring scheme)	12
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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

An inspection at 2 Sisters Llangefni was undertaken by Industry Regulation Officers Matthew Kelk and Sian McGregor Andrew on 10 April 2019.

### **1. Emissions to Water**

At the time of inspection several samples had been taken of the surface water discharge by site and sent to a lab for analysis of ammonia. Results had returned readings of:- 0.9mg/l and 1.8mg/l.

During the inspection site discussed that they believe the contamination may have arisen from offsite.

Discussion was held around setting up a monitoring regime over a time period, with surface water drainage samples sent off site for analysis for Ammonia, this would help ascertain whether contamination found in surface water drains was from on or offsite sources.

Site to send to surface water monitoring drainage proposal.

Post inspection a sampling strategy was sent by site on 12 April 2019, with proposals to take 6 samples from the surface water drainage at the following points:-

- Land drain incoming
- End of old factory pipe (other end of the land drain)
- Outfall from the underground storm drain
- Combine outflow at site exit

*Condition 2.2.2.3:-*

*Emissions to water from the emission points specified in table 2.2.4 shall only arise from the sources specified in that Table.*

Table 2.2.4: Emission point to water			
Emission Point Reference	Source	Receiving Water	
or description			
W1	Uncontaminated Surface Water Drainage	River Cefni	
W2	Uncontaminated Surface Water Drainage	River Cefni	

During the inspection surface water drainage samples were taken from the following points and analysed for ammonia. Results were as follows:-

Land drain upstream of factory: - <0.03 mg/l Ammonia

Land drain leg downstream of factory:- 0.1 mg/l Ammonia

Surface water tank exit:- 1.99 mg/l Ammonia,

Final surface water drainage manhole:- 0.595 mg/l

Results received from site the 9 May 2019 and 23/05/2019 - Sampling results from the surface water drains were forwarded from site and were as follows:-

Lab results:-

Ammonia in mg/l

	U/S	D/S	Tank	Final	
18 April 2019	1	0.2	1.4	0.29	
25 April 2019	0	0.26	31	14	After Rain (Storm Hannah)
30-Apr-19	<0.015	<0.015	<0.015	<0.015	
03-May-19	<0.015		<0.015	<0.015	
06-May-19	<0.015	<0.015	2.8	<0.015	
07 May 2019	0.15	<0.015	0.61	<0.015	

A telecon was held between NRW and 2 Sisters on the 10 May 2019. Discussions were held around the possible source of ammonia as initial results from 2 Sisters showed that the ammonia source was not from off site. 2 Sisters suggested the source could be accumulation detritus in the large surface water tank on site and was being washed out by the rain. We (NRW) expressed our concern at the high level of ammonia and that this was indicative of some surface water contamination coming from another possible source on site.

#### **Action**

It was agreed 2 Sisters will compile a report a all possible Ammonia sources on site and provide detailed maintenance records and or/remedial action taken as to rule out each possible source of contamination. Report to be completed by 28 June 2019.

#### Leakage from Pressure Washer Machines

During the inspection there was evidence of a small leak of diesel entering the surface water drains next to the pressure washer machines.

#### **Action**

To investigate options for the filling of diesel pressure washers to prevent fuel contamination of surface water drains. Report findings to NRW by 28 June 2019. Upon completion of appraisal implement preferred option.

Surface water contamination sampled by NRW on 10 April 2019 and results provided by site indicate that the surface water drainage is not clean and uncontaminated as required by permit condition 2.2.2.3, Breach of condition, scored 1 category 3 score

## **2. Containment**

### *Condition 2.2.5.1*

*Subject to condition 2.2.5.2 below, the Operator shall use BAT so as to prevent or where that is not practicable to*

*reduce fugitive emissions of substances to water (other than Groundwater) and sewer from the Permitted Installation in particular from*

*all structures under or over ground*

*surfacing*

*bunding*

*storage areas*

#### **Condition 2.3.5**

*All Plant and Equipment used in operating the Permitted Installation, the failure of which could lead to an adverse impact on the environment, shall be maintained in good operating condition.*

Within the sludge tank bund from the chemical scrubber leaking chemicals are causing the potential for the surface of the bund to corrode. Odour of chlorine within bund. Potential to weaken bund and the effectiveness of the containment and additionally potential to cause the leaking scrubber chemical to leak to ground.

Breach of condition 2.2.5.2

Breach of condition 2.3.5

#### **Drip Tray Condition**

Minor cracks were found in the plastic drip trays storing chemicals in the lairage area.

#### **Action**

Site to replace drip trays with immediate effect, condition of drip trays will be assessed during subsequent inspections.

Breach of condition 2.3.5

Breach of conditions 2.2.5 and 2.2.5.2, scored 2 category 3 scores.

### **3. Noise**

A number of noise complaints have been received by NRW regarding potential noise from the Llangefni site. Night time noise monitoring was undertaken by NRW on the 7 May 2019. On that occasion noise from the site could not be detected at the complainants property. Noise was monitored from the Ammonia plant on the evening of the 7 May 2019 and it was evident there was the potential for the ammonia compressor fans to be audible by receptors close to site.

Email from Dominic Donachie (2 Sisters) met complainant on the 29 May 2019 and noise that resident is hearing could only be replicated when cooling tower running at 100% full speed.

Site have replaced several squeaking belts on the ammonia plant. 2 Sisters are keeping the compressor fans off between the hours of 20:00 and 6:00 for period of few days to carry out an assessment of the noise and what course of action they need to take.

As there is potential for the Ammonia plant to be heard from off site receptors close to the site, Natural Resources Wales (NRW) request that site carry out a Best Available Technique (BAT) Assessment using a suitably qualified/competent person of the noise and vibration from the Ammonia Plant on site and to then report the findings of the report to NRW by 28 June 2019

NRW require that the noise mitigation measures recommended by this report are implemented on site to minimise noise and vibration from this source.

The report should include:-

- *Identifying contributory sound sources and characteristics from the ammonia plant (including tonality, impulsivity, intermittency)*
- *Rank the sources – both in terms of dB(A) and character, at receptors, site boundary or other reference positions*
- *Establish the noise control options for the dominant source; repeat for the next most dominant sources,*
- *Draw up a schedule of noise reduction v cost*



## EPR Compliance Assessment Report

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Site	Llangefni prepared meats	Permit Ref	SP3430RL
Operator/Permit holder	2 Sisters Food Group Limited	Date	10/04/2019

### 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.

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.

### 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			
E3	C3	See text for details.	28/06/2019
E2	C3	See text for details	28/06/2019
B1	C3	See text for details	28/06/2019

## 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](mailto: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.