

Compliance Assessment Report

Report ID:
CAR_NRW0023783

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

Site	Cross Hands	Permit Ref	BU8002IT		
Operator/Permit holder	Dunbia UK				
Regime	Installations				
Date of assessment	19/05/2016	Time in	09:30	Out	14:45
Assessment type	Audit				
Parts of the permit assessed	See summary				
Lead officer's name	Jenkins, Nicholas				
Accompanied by	Taylor, Richard,Gibson, Paul				
Recipient's name/position	Alison Trace/ Health Safety and Environment Manager	Date issued	21/07/2016		

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
A1 - Specified by permit	A	
F1 - Amenity - Odour	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

Attendees

Charlotte Sutton – Plant manager – Cross Hands site (Dawn Meats)

Richard Francis – Operations Manager – Cross Hands site (Dawn Meats)

Rob Davies – Site Engineering Manager

Simon Grove – Engineering Manager – Cross Hands site (Dawn Meats)

Arek Tomczyk - Group Engineer UK (Dawn Meats)

Patrick McCormack - Group Project Engineer (Dawn Meats)

Fiona McLachan – HSE Manager – UK (Dawn Meats)

Alison Trace – Environmental Manager – Cross Hands site (Dawn Meats)

Paul Gibson – Industry Regulation Team Leader (Natural Resources Wales)

Nick Jenkins – PPC Officer Industry Regulation (Natural Resources Wales)

Richard Taylor - PPC Officer Industry Regulation (Natural Resources Wales)

Agenda

1. Introductions
2. Factory and yard tour/future process changes at the installation
3. Outstanding actions
4. BRef update and sector objectives
5. Review of Accident Management Plan
6. AOB

The purpose of the meeting was to discuss proposed processing changes to the Dawn Meats site and to discuss whether the changes would need to be regularised by a variation to the environmental permit. It was also an opportunity for Paul Gibson and Richard Taylor of Natural Resources Wales (NRW) to be provided with a comprehensive overview of the installation and the recent investment to realign the cooked area. Dawn Meats (U.K) have recently invested around £4million pounds at the Cross Hands site to realign the cooked meat section to increase production efficiency. This work was consolidated in the most recent variation to the environmental permit issued in July 2015.

1. Introductions

Representatives from Dawn Meats Project team were in attendance at the meeting to discuss the proposal to introduce a new process at the site. Patrick McCormick (Group Project Engineer) and Arek Tomczyk (Group Engineer UK) have been providing engineering expertise and support to the Cross Hands site. Richard Taylor is a new regulatory officer in the South West Industry Regulation team and has a site portfolio that includes food, drink and milk sites.

2. Factory and yard tour/future process changes at the installation

We toured the installation both internally and externally focusing on the proposals to introduce a new product development project in the cooked area. The product itself is a cooked and packed ready to eat product. The product is formed and conveyed through the travelling oven and the spiral freezer. On completion of this process the product is flow wrapped and metal detected then

retorted.

The retort itself functions similar to that of a pressure cooker, pulling existing site services such as steam, water, power and compressed air to cook the product and in turn sterilise the product before packaging. When the retort starts up, steam is released for 2 to 3 seconds to alleviate pressure from the retort. The steam is vented to the atmosphere through a 2 inch steel pipe.

The product enters the retort already packed so the retort acts as a controlled condensation pasteurizing process, sterilising the product to kill any remaining bacteria that may be remaining from the first cook.

We consider this process as having an insignificant impact on the receiving environment based on the transitory release to air from a small diameter emission point but also due to the nature of the product passing through the process i.e. sealed. This will also reduce the likelihood of odour being emitted from the process. We would therefore advise Dawn Meats that the process will not require a variation to the permit and can commence following the meeting.

We discussed whether there was any proposals to extend the current footprint of the site and Dawn Meat advised that although there are future projects around the cooked meat section, currently there is no plan to expand the site.

3. Outstanding actions

An improvement condition was included in the penultimate permit variation which required the operator to submit a report to assess the validity of a new surface water sampling point. The report was accepted but failures of ammonia permitted levels were identified in subsequent quarterly submissions to NRW. As an additional action we requested Dawn Meats to ensure that the sample provided was suitable in that a method of collecting a sufficient sample was created. Dawn Meats provided photographs of a new weir system at water sample point W6 and have since provided additional quarterly samples which have been assessed as complaint.

The operator has also commenced two cleaning regimes; i) annual gutter clearing, and; ii) 5 yearly surface water drain clearing. Both have been added to the Maintenance Management System (Pirana). Evidence was provided to endorse the operator's claim. This work should ensure that any contaminants into the surface water system are minimised. We welcome this approach.

We discussed the permitted limit of ammonia in the surface water system i.e. 0.25mg/l and the operator advised that they were aware that this appeared to be very tight when analysis of background concentrations were in the region of 0.2mg/l (but this is unconfirmed). W5 and W6 are emission points to the attenuation pond flowing to the Afon Gwili. W5 and W6 sources are defined as; i) all surface water and roof water from site buildings, and; ii) clean uncontaminated rainwater from roofing areas respectively. The decision document for the original permit outlines that the limit of ammonia was chosen due to a designation of the river ecosystem classification. This was set at the highest level i.e. 1. Having spoken to the local Natural Resource Management team it maintains that the ammonia levels for this discharge are correct and need to be at this level due to other inputs into the Afon Gwili that can impact upon Ammonia levels. Action – NRW to understand background concentrations of Ammonia to discuss at next opportunity.

The operator currently submits monthly reporting for emissions limits to water in line with Table 2.2.7 of the permit. To enable consistency of compliance scoring we have agreed that the current reporting frequency can be extended to quarterly. Dawn Meats has since submitted an amended report forms to account for the change.

4. BRef update and sector objectives

Paul Gibson provided an overview of the legislation around the Best Available Techniques Reference (Bref) document for the food, drink and milk sector (FDM). It was also discussed whether Dawn Meats had any representation on the food and drink technical working group to input into the review and if not we could ask for an invitation. The response we had from the group was that Dawn Meats are members of British Meat Processors Association (BMPA) and the Trade Association has focused on the Slaughterhouses and Animal By-Products (SA) BRef which has more relevance. Dawn Meats did have a representative on the SA Shadow Group but the individual has now left the company. The first draft of the FDM BRef is expected to be released by the end of 2016.

Recommendation - It may be worth contacting the BMPA (assuming that Dawn meats are members) to check if it wants to re-engage with the technical working group.

2016/17 objectives for the FDM sector have been developed by NRW and the main objective is to review all the tank storage, associated bunding and on site drainage. This should be assessed against the requirements of 'Containment systems for the prevention of pollution' CIRIA C736 published in 2014.

Other targets within group include i) Waste and by-products and ii) Water Framework Directive. Subsequent audits/inspections in 2016/17 will focus on the above objectives.

5. Review of Accident Management Plan

Dawn Meats submitted their accident management plan (AMP) for review. The AMP was published on 27/01/16 (ref EVP022) having been prepared by Alison Trace and approved by Fiona McLachlan. The aim of the plan is to prevent or where possible minimise environmental impact of any incident should it happen. It is the responsibility of the Environmental Manager to ensure that the AMP is implemented and reviewed annually. Dawn Meats permit (section 2.8.1) states that the plan shall be reviewed at least every two years or as soon as practicable after an accident. We welcome the annual review but the operator will still need to be aware of the review following an accident.

The AMP references 3 procedures but these were not reviewed in this exercise:

- EVP002 Emergency Preparedness and Response Procedures
- EVP004 Spillage Procedure
- EVP003 Notification of spills and emissions

Section 6 outlines the risk matrix for incidents: severity against the likelihood of occurrence and looks at what the operator considers to be the likely accident scenarios. The AMP details 12 scenarios (6 more than what was detailed in the original application) with all the scenarios falling into what could be considered the 'acceptable' i.e. low likelihood but significant impact. It could be argued that some of the scenarios could be rated higher particularly the impact from a fire. We discussed that the impact from a fire which could force a site shut down but could also close the adjacent A48 therefore falling into the catastrophic incident categorisation.

Ranking an event on a risk matrix can be done in three ways:

Worst case scenario - This is done by taking the worst that could happen, for instance in the case of a fire, there will be multiple fatalities, closure of roads, shut down of the process and it might be likely to occur. Essentially when looking at the worst case scenario, all 'Barriers' are ignored and only the 'Hazard', 'Top event' and 'Consequences' are considered. These types of incidents might occur in reality but they will most likely be the exception, not the rule.

Current situation - The second strategy tries to evaluate the severity and probability of the average event. So the average severity for a fire might be a temporary closure of a single process line, discharge of fugitive emissions and it's unlikely to happen. This strategy takes into account all the barriers that are currently implemented.

Future situation - The last strategy tries to make an estimate of how the risk might go down after improvements to barriers, or implementation of new barriers. It aims to estimate the future average of incidents.

Based on the operator's AMP it is unclear which scenario it has followed.

Other recommendations following the review of the AMP include:

1. Creating an incident response plan which will assist in responding effectively to an incident at the site, which would outline the external and internal contact; chemical product and waste inventory; pollution prevention equipment and its location and a site plan. This can be kept at the security lodge to present to the emergency services on arrival.
2. Effluent treatment plant malfunction – Quantify the retention time on the balance tank if a malfunction occurred. Consideration of who to contact i.e. DCWW/LA as asset owners of the sewage treatment works.
3. In many of the scenarios including loading/unloading on site and spillages of oils there is reference to contamination of groundwater. It would be sensible to consider where this could happen as this could impact upon the severity of the incident.
4. Both vandalism and operator error/misuse of procedures scenarios provide a severity that is dependent on the procedure. It is recommended that these are more specific in line with the three categories explained above.

6. Any Other Business

EPRTTR

Dawn Meats reported their submission within the designated window and the results will be reviewed in due course. Any anomalies against 2014 figures will need to be verified with the operator.

Environment Week – Commencing 24 June 2016

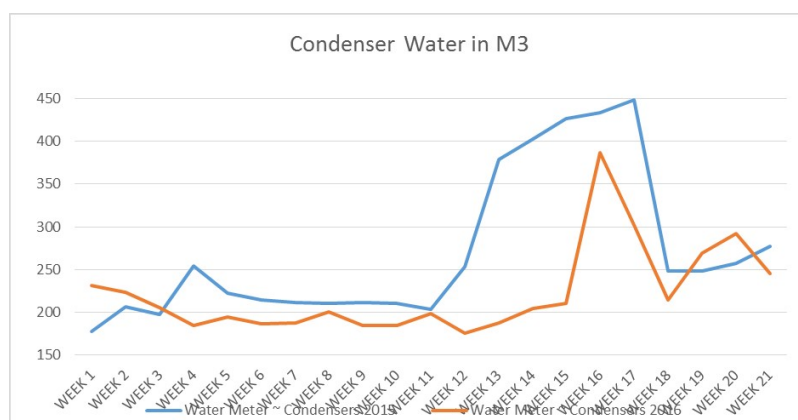
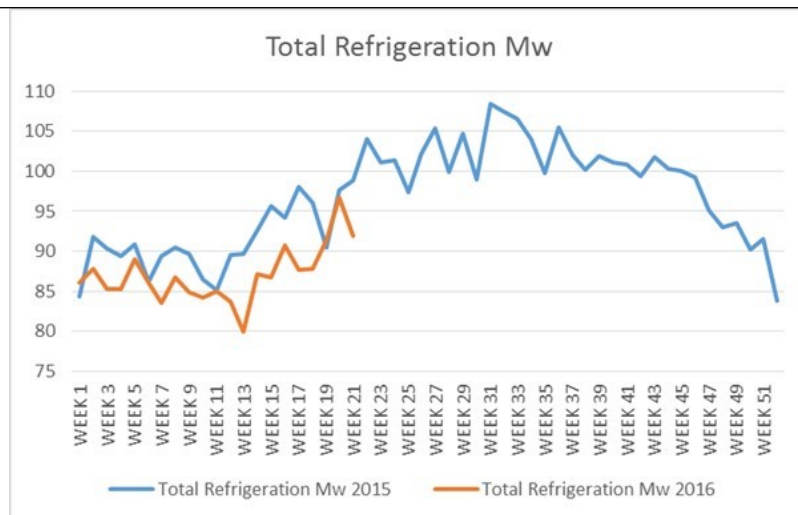
The operator approached NRW to request assistance in their environment week which aims to encompass pertinent environmental aspects. Dawn Meats was specifically interested in biodiversity and NRW provided contact details of our local Natural Resource Management team in Cross Hands. It would be very helpful if we could discuss the operator's feedback on the week at the next opportunity.

Energy Efficiency

As with most companies, and especially the food and drink sector where vast amounts of refrigeration is needed, energy usage is a significant financial cost to the site operator. Energy usage also has environmental and societal costs by depleting resources and contributing to problems such as climate change.

Dawn Meats has always been a progressive company and continually looking to improve their operations. They are currently looking at implementation of ISO 50001 - the energy management standard which outlines the best way to achieve energy efficiency, whatever the nature of the business. The standard helps companies meet their own environmental and carbon reduction targets as part of improved energy performance. It provides a structured approach towards measuring and monitoring energy usage to hopefully lower energy bills and reduce carbon emissions.

Projects discussed during the meeting include the installation and operation of variable speed drives on the refrigeration process. The following graphs provide an indication of the savings based on financial years 2015 and 2016 to date. The overall saving has been in the region of 5% for total energy and around 20% condensate water.



Other projects which have been included in the operator's Horizon project to increase its consumption footprint are rainwater harvesting (to be considering in this financial year) and currently trialing LED lighting to replace metal halide alternatives.

We discussed the example of reusing process water from the ETP into the cleaning process as well as production and the following link provides a working example of where such a process has been made available through reverse osmosis technology.

<https://www.muller.co.uk/about-mueller/being-sustainable/case-study-water-reuse-at-bridgwater-and-droitwich.html>

Conclusion

Dawn Meats requested NRW's attendance at the installation to provide guidance as to whether operations that it is considering, would need to be regularised by a permit variation. We encourage this way of working and for any future developments we would also reassure the operator that early discussions are welcomed. It is evident that Dawn Meats have and will continue to invest in the Cross Hands plant to ensure efficiency but also to ensure that it keeps its place in the market. The environment week is an example of highlighting the importance of the local environment to the staff at the installation and we have offered the skills of our biodiversity team to assist where necessary. Feedback on the week can be discussed at the next opportunity and any changes to next year's environment week can be considered.

[END]

EPR Compliance Assessment Report

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Site	Cross Hands	Permit Ref	BU8002IT
Operator/Permit holder	Dunbia UK	Date	19/05/2016

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 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.