

Compliance Assessment Report

Report ID:
CAR_NRW0035642

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

Site	Sandycroft Poultry Processing	Permit Ref	YP3632EM			
Operator/Permit holder	2 Sisters Poultry Limited					
Regime	Installations					
Date of assessment	23/07/2019	Time in	10:00	Out	15:00	
Assessment type	Site Inspection					
Parts of the permit assessed	All					
Lead officer's name	Kelk, Matthew					
Accompanied by						
Recipient's name/position	Steve Van Der Keift/ HS&E Manager	Date issued	26/09/2019			

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	A	
B4 - Infrastructure - Containment of stored materials	C3	2.2.5.1
C2 - General Management - Management system and operating procedures	C3	1.3.1
E5 - Emissions - Waste	A	
F1 - Amenity - Odour	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	2	Total compliance score (see section 5 for scoring scheme)	8
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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 of the site was undertaken on the 23 July 2019 by Senior Industry and Waste Regulation Officer Matthew Kelk.

This CAR form also details visits to site on 30 August and 16 September 2019 following a number of odour complaints received.

The following issue were discussed as outlined below:-

Environmental Management System Objectives and Targets

An overview of EMS objectives and targets met was given during the inspection.

Water usage - gizzard machine, water turned off, reduced by 25 litres a second.

Water usage per bird at around 6.8 litres, aiming to reduce to 6.5 litres. Large amount of water used for cleaning, there is a recirc on scald tank.

Management Structure

General discussion was held around the management structure on site and responsibilities on site. The engineering manager will deal with environment issues in the absence of the HS and E Manager. All Team leaders are incident trained.

Training

Dashboard system for sign off. Procedures with an environmental impact are trained out with refresher each year. This is under constant review. Training matrices was reviewed in the engineering department during the inspection.

Procedural Review

During the inspection procedures were reviewed for the Blood and sludge abatement and the Scald tank odour abatement.

The spill procedure was audited and it was discussed that the Natural Resources Wales (NRW) incident hotline telephone number needed to be included.

It was further discussed that a procedure for offal and feather collection needed to be compiled, this has since been sent to NRW via email on 30 July 2019.

Action

2 Sisters to review spillage procedure to include NRW incident hotline number (0300 065 3000)

Environmental Auditing

Site were queried about environmental auditing of procedures, this is carried out and any corrective action usually flagged to managers. Environmental actions are discussed at weekly management meetings and actions are closed out before the next meeting.

Incident Notification

Currently incident notifications from NRW are sent to site via telephone call to security. It was discussed that it could be more efficient and effective to send notification to site via a notification email. Site were keen to implement this.

Action

Site to provide a list of email addresses that the incident notification email would be sent to and then in turn a notification procedure will be set up for NRW.

Site Walkover 23 July 2019

Condition 2.2.5.1

Subject to condition 2.2.5.2 below, The Operator shall use BAT so as to prevent 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*

During the site walkover evidence of waste oil containers being stored outside of bund area.

Toolbox talk given to staff post inspection around safe storage of chemicals and waste, email with toolbox talk sent to NRW by 2 Sisters to NRW 1 August 2019. No further action.

Breach of condition 2.2.5.2, score 1 category 3 score.

Recommendation

Ensure that all IBC are not stored over the edge of bund/drip tray walls, rendering the bund ineffective. Action taken post inspection during above toolbox talk.

Condition 1.3.1

Without prejudice to the other conditions of this Permit, the Operator shall implement and maintain a management system, organisational structure and allocate resources that are sufficient to achieve compliance with the limits and conditions of this Permit.

Large number of preventive maintenance log sheets for the scrubbers on site not filled in.

Action

To retrain staff on the importance of filling in environmental procedure check sheets. To send logs of training by 10 October 2019

Breach of permit scored 1 category 3 score.

Recommendation

Ensure that check sheets for scrubbers detail the minimum level of scrubber chemicals that should be left within containers. Action has been carried out post inspection.

General

The scald scrubber was being switched off after kill and when the scald tank had been dropped, when minimal odour remained in this area. Following complaints there was discussion whether may be causing some odour to migrate offsite. The scald scrubber is now being left on.

Site Walkover 30 August 2019

All scrubbers functioning correctly whilst on site, PPM records were checked and confirmed that days prior to this site walkover that the scrubbers were operational.

Recommendation

It was recommended during the inspection that there was a localised odour from the effluent balance tank where the pipe enter the tank. Site have since covered these entry points to minimise odour migration, email received from site 2 September 2019.

It was also recommended that effluent from the rear of the offal trailers is piped straight into the foul drains, rather than running a

few metres across the yard into the foul drain.

Site walkover 16 September 2019

All scrubbers were working correctly during this inspection on both for the scald tanks and the scrubber on the blood/sludge.

A feather trailers was changed during the brief inspection and within a 10 minute period the trailer was sheeted before being taken off site.

During the visit a chute from the offal screen was partly spilling on to the year rather going down a gravity fed drain. This was causing a localised odour.

Action

To re-channel chute to ensure that effluent is channelled into the drain. Post inspection, this was completed on the 17 September 2019.

General

According to the scrubber manufacturer (Parsons), there is a large amount of scrubber liquor in the reservoir should dosing fail and would not expect breakthrough for at least 24 hours.

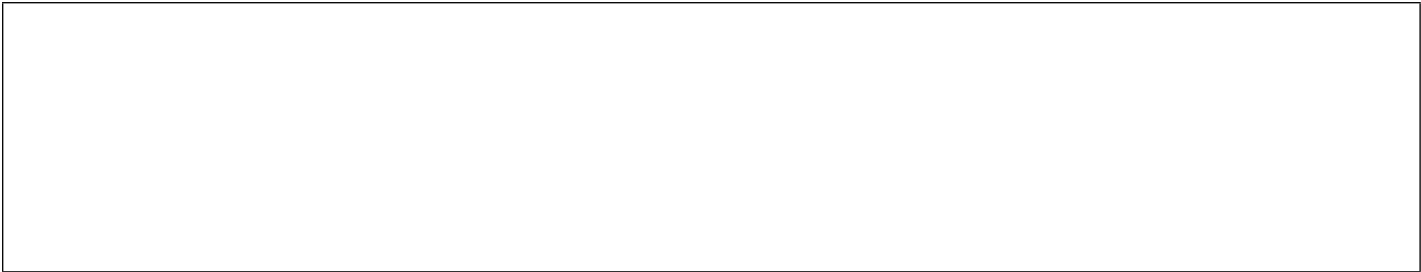
Action

Following discussion on site 2 Sisters are not dosing the scald scrubber for a period. NRW request that the review of the redox potential and pH on the scrubber is monitored during this period to ensure no odour breakthrough and subsequent odour migration offsite. NRW request that the scrubber procedure is updated to reflect this review by 10 October 2019.

Discussion held on site whether offal/feather movements are causing odour to migrate offsite at the time of collection. Whilst this movement has to occur, it was discussed whether this could be moved to early in the morning when the odour is less likely to be a nuisance.

Action

Site have started compiling a spreadsheet to see if odour complaints correlate with offal/feather movements and whether these could be moved to a more suitable time. Initial review received from site 4 September 2019, to report to NRW feasibility of moving offal/feather movements by 10 October 2019.



EPR Compliance Assessment Report

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Operator/Permit holder	2 Sisters Poultry Limited	Date	23/07/2019

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			
C2	C3	See text for details.	10/10/2019
B4	C3	No further action	25/09/2019

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. 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.