

Compliance Assessment Report CAR_NRW0039754

Permit being assessed: DP3030ZC.

For: PB Gelatins EPR/DP3030ZC, held by PB Gelatins UK Limited

At: Unit A6 Severn Road , Treforest Industrial Estate, Pontypridd, Rhondda Cynon Taf, CF37 5SQ.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 20/04/2022 between 11:00 and 13:30.

Parts of permit assessed: Site Inspection

NRW Lead Officer: Dale Padfield, accompanied by Geraint Harris.

Report sent to: Julie Campbell, Health, Safety and Environment Manager on 25/04/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

PB Leiners

Permit EPR/DP3030ZC

Site inspection and regulator handover 20th April 2022 (11:00 – 13:30)

The primary purpose of the visit was to hand regulation of the site under EPR from Geraint Harris (GH) to Dale Padfield (DP). This meeting and inspection served as an introduction to the site and an overview of site operations and site layout.

NRW were met by Julie Campbell (JC) (Health, safety and environmental manager) at reception before being introduced to the plant manager Mauricio Caetano Ramos. NRW were then led by JC on a full tour of the site.

The tour began at the blending and production buildings, where limed ossein is received and the final extraction, drying, blending, and bagging processes take place. A walk around the perimeter of the building was conducted, to the water works area. The only observation made by NRW in this area was an IBC not stored correctly within the drained storage area. The IBC was empty but did appear to contain a small amount of non-hazardous liquid. This was quickly rectified; JC reminded the operators to double stack the empty IBCs to ensure they are all stored correctly within the drained area to prevent any leaks or spills entering the unmade ground.

NRW were then led to the effluent pumping station. Bones were seen on the pavement outside the pumping station on 12/04/2022. PB Leiners were emailed the photos on the 12/04/2022 and asked to clean the area, investigate why this was occurring and to create an action plan to prevent further occurrences. A response was received from PB Leiners on the 14/04/2022 with photos now showing the area clean and free of bone, this area was observed to still be free of bone during the inspection. PB Leiners investigation concluded that the bone fragments had come over the wall during the routine wash down of the effluent station. PB Leiners have reiterated to staff via training to check the area. As a temporary fix, PB Leiners have filled the gaps with expanding foam but have plans to erect a screen inside the effluent plant to prevent any further occurrences of this nature.

NRW were shown the old farm and new farm areas of the site. This is where the ossein is received and undergoes the liming process. The liming pits, balance tank and wet and dry odour scrubber were observed. Bone was seen on the pavement outside the old farm area on 12/04/2022, this is where the trucks are loaded with limed ossein and transported to the production building (A21). PB were emailed the photos on the 12/04/2022 and asked to clean the area, investigate why this was occurring and to create an action plan to prevent further occurrences. A response was received from PB Leiners on the 14/04/2022 with photos showing the area clean and free of bone, this area was observed to still be free of bone during the inspection. PB Leiners investigation concluded that the bone had been deposited on the road due to the operator not washing the lorry down post loading of the bone. PB Leiners have stated that the standard operating procedure for this task is being trained out again and the situation is to be monitored.

No malodours were detected outside the site boundaries during the inspection, all odours were contained within the production and new farm buildings.

The site visit concluded with a short meeting with JC and plant manager Mauricio Caetano Ramos. NRW are pleased to hear that PB Leiners are exploring the possibility of installing a scrubber system on the New farm building (A18) to help further mitigate malodours and provide PB Leiners with increased flexibility in its operations, we look forward to hearing on the development of this project.

END.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. 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 our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.