

Compliance Assessment Report

Report ID:
CAR_NRW0031661

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

Site	PB Gelatins EPR/DP3030ZC		Permit Ref	DP3030ZC	
Operator/Permit holder	PB Gelatins UK Limited				
Regime	Installations				
Date of assessment	06/04/2017	Time in	09:00	Out	11:00
Assessment type	Audit				
Parts of the permit assessed	EMS				
Lead officer's name	Willey, David				
Accompanied by					
Recipient's name/position	Alan Fitzpatrick/ Health and Safety Officer	Date issued	24/05/2017		

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
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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

Site visit 6th April 2017

The main purpose of this visit was to ensure that the improvements proposed by PB Gelatins, as well as the actions identified in the last CAR Form dated 06/01/17, had been completed.

The site has received one odour complaint in 2017 that was non-substantiated by PB Gelatins and Natural Resources Wales (NRW) were not informed by the complainant. PB Gelatins have been undertaking regular cleaning of the balance tank to prevent the build of potential odorous material. PB Gelatins now clean the balance tank every six months and drop the level of the tank monthly to enable a visual inspection. This procedure will be reflected in a Standard Operating Procedure (SOP) within the sites Environmental Management System (EMS).

The following actions have now been completed:

ACTION: PB Gelatins to provide the results of the drain survey to NRW to ensure that all drains have been identified in that area of the site.

Completed.

ACTION: PB Gelatins to provide copies, and any associated updates, to NRW for the EMS documents referred to in the CAR Form issued on 15th December 2016.

Update was provided with associated timescales. PB Gelatins are looking to have the EMS finalised and in place by the end of 2017. An overview of the sites EMS was provided and is very encouraging, it is evident a lot of time and resources is being dedicated to putting the EMS together. Alan Fitzpatrick is due to attend appropriate training on the requirements of ISO 14001. PB Gelatins will be undertaking a GAP analysis prior to certification of the EMS.

ACTION: PB Gelatins to review the checks in place for the pumps.

Checks have been reviewed and include a check of the non-return valves. There are daily checks that form part of the Preventative Management Plan (PMP). The PMP is subsequently reviewed every six months.

ACTION: PB Gelatins to provide a SOP for the inspection of the non-return valve to ensure it is in good working order.

Completed.

ACTION: PB Gelatins to ensure staff are fully trained on the requirements of the sites EMS (and associated procedures), the requirements of the EPR permit and to appreciate the significance of their roles in complying with the conditions of the environmental permit.

Presentation has been put together. NRW viewed the useful presentation that raised awareness of the permits requirements.

ACTION: PB Gelatins to evaluate setting a constant or zero flow rate alarm if values remains constant (protection if level control fail making pump non-operational).

This is not considered to be advantageous to PB Gelatins. The alarms, daily checks and PMP should provide sufficient control measures.

ACTION: PB Gelatins identified the possibility of receiving SCADA alarms on pager / phone. NRW see this as an important step to ensuring immediate response to rising sump levels.

The existing version of SCADA is unable to perform this function. PB Gelatins are using mobile phones at present with an alternative method being considered.

ACTION: PB Gelatins to update the sites emergency preparedness and response plan / accident management plan with a company alarm strategy that includes a clearer definition and purpose for the sites alarms with associated training and reviews. This will include formal audits and reviews to ensure tighter quality control.

Internal audits to be carried put on a three-month cycle. Will be embedded in the sites EMS.

ACTION: PB Gelatins to undertake integrity testing of the effluent pumping station investigating worst case scenarios and implementing associated procedures within the EMS.

Integrity testing will be undertaken during downtime at the site with the process and requirements written into the sites EMS.

ACTION: PB Gelatins to clean the pipework that feed the effluent discharge. Cleaning of the pipework should be replicated to other areas of the Old Farm as part of good housekeeping and to ensure clear running of the effluent. This should also form part of the sites EMS.

A SOP has now been created and referred to through the sites EMS. Improvements have been made to the flow of the effluent to avoid the flow from slowing causing settlement.

Actions following inspection on 21/12/16:

ACTION: Access to chambers E8 and E9 on the WJEC site to be put in place with suitable access points.

Access has been provided with the chambers being sealed (but are accessible for inspections) to avoid potential odour release to the nearby WJEC offices.

ACTION: SOPs to be put in place for the inspection of all the chambers to ensure there is no deterioration in their integrity.

Chambers have been identified on the drainage map with checks incorporated into the EMS. PB Gelatins have undertaken inspections of the chambers and provided inspection reports displaying the level of corrosion prior to the repairs being made. This approach is a very useful tool to identify problem areas and ensure the chambers are maintained appropriately avowing the potential for a pollution incident.

Site inspection

Inspection chambers

Following the collapse of E9 in December 2016 both E8 and E9 have been identified with improved access to undertake inspections. Manhole inspections will be undertaken annually with annual CCTV inspections. These manholes are sealed with bolts to prevent potential odour release to the nearby WJEC buildings.

Photo 1 and 2: E8 &E9 inspection chambers



ACTION: Please could PB Gelatins provide the full report of all the manhole chambers inspected.

Pumping station

Following the pollution incident on 21st September 2016 the resulting CAR Form issued on 15th December 2016 contained several actions that have been completed. Photo 4 below shows the effluent entering the sump with photo 4 showing the level indicators that are triggered when the level reaches 3 metres. Pump 1 is set to begin pumping when the level reaches 1.42m and pump 2 when the level reaches 1.62m. The pumps will continue to operate until the level reaches 0.78m. There is a weekly check of the alarm system and a six-monthly leak/pressure check of the drainage system. The next test is likely to be in May / June 2017.

Photos 3 and 4: Raising level indicators

Photo 3: Process influent to sump	Photo 4: Level indicators
 A photograph showing the interior of a concrete sump. Two large circular pipes are visible, with effluent flowing into them. A metal railing is in the foreground, and a metal grate is on the right side.	 A photograph of a concrete wall in a sump. Two level indicators are mounted on the wall: a blue one and a white one. A metal railing is visible in the foreground.

ACTION: PB Gelatins to update the document 'Principle Equipment and Environmental Safe Guards' January 2015 to include the improvements made.

PB Gelatins have replaced the old overflow pipe with an appropriate size pipe that has associated inspections to ensure it is in working order. Photo 7 has the newly installed overflow pipe.

In addition, a red line has been painted on the wall to indicate if the level reaches 3.2m, by this point the high-level alarm should have been triggered at 3m. The line is viewed by the site operative via CCTV (photo 5). This was witnessed by NRW during the inspection.

Photos 5 - 8: Pumping station

Photo 5: Red line indicator 	Photo 6: CCTV camera 
Photo 7: New overflow pipe 	Photo 8: Two working pumps 

During the inspection of the pumping station odour was detected. When the levels within the sump are low there is the potential for odour to be dispersed in the near vicinity. It would be beneficial for PB Gelatins to power house down the walls and infrastructure to avoid the build-up of material and the potential for odour.

ACTION: PB Gelatins to revise their cleaning procedure within the pumping station to avoid the build-up of odorous material when levels in the sump are low.

Waterworks area

As part of previous recommendations PB Gelatins have installed a new container to store IBCs and drums. The container allows for sufficient containment if there is an incident and the concrete surface allows for any spillages during unloading to be contained and be directed to the sites process effluent line and then for treatment.

Photo 9: New bunded storage container



Photo 10: New impermeable surface



A new effluent line has been constructed and runs alongside the A21 building. E1A diverts to E1B before being redirected to E2C to E2D returning to the main effluent line. The revised drainage plan dated 31/03/2017 clearly identifies the new effluent line and associated chambers.

Photo 11: S30 in process of being re-built



S30 has been extensively worked and improved to screen out debris from building up in the culvert. Unfortunately, after each heavy rainfall episodes material is washed down and is collecting in PB Gelatins cleared pipework.

ACTION: NRW to investigate who has ownership of the upstream pipework and manhole S29. This should then help limit the amount of material being washed down.

Photo 12: New extraction vents



During the visit of the main process area PB Gelatins informed NRW that they are in the process of installing two new gelatin extraction tanks. The additional two new tanks will help improve efficiency on site reducing the amount of Oessin going to waste that is not being fully processed. The addition of the two new tanks requires two new vents, photo 12, to atmosphere.

ACTION: PB Gelatins to include the two new emission points in the variation application currently with NRW for the inclusion of the steam boilers.

End

EPR Compliance Assessment Report

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Site	PB Gelatins EPR/DP3030ZC	Permit Ref	DP3030ZC
Operator/Permit holder	PB Gelatins UK Limited	Date	06/04/2017

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.