

Compliance Assessment Report

Report ID:
CAR_NRW0032040

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	16/08/2017	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	Annual returns and odour				
Lead officer's name	Willey, David				
Accompanied by					
Recipient's name/position	Alan Fitzpatrick/ Health and Dafety Officer	Date issued	16/08/2017		

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
F1 - Amenity - Odour	C3	3.4.1
	C3	3.4.1
	C3	3.4.1

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
------------------------------------	----------	---	-----------

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

Odour complaints and annual report 2016

NRW have received eight odour complaints via the Incident Communication Centre to date in 2017. Details of the complaints received as well as unannounced inspections are listed below.

6th July 2017

NRW unannounced check. No complaint received.

Perimeter odour checks undertaken with a sludge type odour detected near to Gate 2 of the Old Farm. NRW met with PB Gelatins on site and there was an odour from the wet scrubber at source. Since the new chemical wet scrubber has been installed there had been no odour detected during NRW inspections. PB Gelatins investigating the condition of the scrubbers.

10th July 2017

Odour complaint received. Site not attended and complaint not substantiated by NRW. Complaint was substantiated by PB Gelatins.

This is the first odour complaint NRW have received since 28th September 2016 for odour from the site.

Following the visit on the 6th July 2017, and the complaint received, PB Gelatins are in the process of having the performance of the scrubber checked by the equipment supplier.

PB Gelatins did experience odour on the 7th July 2017 that was reported by PB Gelatins employees and Keyline, the odour was reported as being unusual and not associated with the odour sources already identified. PB Gelatins carried out an investigation and it appears that there had been a production problem while processing two particular loads of bone.

ACTION: PB Gelatins to report to NRW using the Schedule 5 Notification the root cause, and measures to be implemented, to avoid this scenario from occurring again.

Considered to be a category 3 breach of permit condition 3.4.1 of the permit EPR/DP3030ZC.

11th July 2017

Odour complaint received. Site not attended and not substantiated by NRW.

12th July 2017

NRW unannounced check in response to complaint received on 11th July 2017.

NRW attended site where a noticeable odour was detected near the pumping station.

Considered to be a category 3 breach of permit condition 3.4.1 of the permit EPR/DP3030ZC.

ACTION: PB Gelatins to investigate techniques to further mitigate against the odours generated at the pumping station.

There were also reports of bad odour that have been related to that of the processing issue on Friday 7th July. This is being investigated by PB Gelatins and will be reported once the root cause has been identified.

14th July 2017

Odour complaint received. Site not attended and not substantiated by NRW.

PB Gelatins investigated but could not detect an odour.

17th July 2017

NRW unannounced check. No complaint received.

NRW attended site on the 17th July. An odour was detected near the pumping station at the same time as the pumping station was being washed down.

There was also a detectable odour at the Welsh Water Pumping Station located on Bridge Street.

PB Gelatins to consider an alternative time for washing down the pumping station as this activity may be leading to an odour release.

The pumping station has recently had a sprinkler system installed to help keep the sump area clean and avoid the build-up of residual bone that may begin to decompose and cause an odour. There is the potential that this activity may generate an odour until the sprinkler system is established. The sump is also hosed down to ensure the sump level indicator is clearly visible and to clear away areas that the sprinkler system may not clear.

19th July 2017

Odour complaint received. Site attended but not substantiated by NRW.

An odour was reported near to the GB-Sol premises located on Bridge Road by a worker at the company. NRW attended site and could detect the odour although it was short term and not strong. NRW raised this with PB Gelatins who are investigating potential blockages in Welsh Water pipes on route to the Welsh Water Pumping Station.

ACTION: PB Gelatins to investigate the potential blockage with Welsh Water.

25th July 2017

Odour complaint received. Site attended and complaint substantiated by NRW.

NRW attended site and detected an odour near to the Keyline premises. After attending site the source of odour was identified as emanating from the wet scrubber. The wet scrubber was having its daily maintenance undertaken where the diox and water is replaced. On this occasion, due to the dry media needing replacing, odorous air was released and was detected off site.

Considered to be a category 3 breach of permit condition 3.4.1 of the permit EPR/DP3030ZC.

The dry media has since been replaced on the 28th July 2017.

ACTION: PB Gelatins to review the maintenance checks for the dry scrubber to ensure there is early detection of the deterioration and/or effectiveness of the media.

26th July 2017

Odour complaint received. Site not attended and not substantiated by NRW.

Odour release was due to the cleaning of equipment that was odorous with the waste water carrying the odour to the drains. This cleaning was stopped and drains were washed.

4th August 2017

Odour complaint received. Site attended but not substantiated by NRW.

10th August 2017

Odour complaint received. Site attended but not substantiated by NRW.

Annual returns

The annual performance report was received on the 1st February 2017. The report was reviewed with a reduction in the amount of energy used on site identified. No other comments.

ACTION: PB Gelatins to supply the annual production levels of Gelatin for 2016.

End

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0032040**

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	Date	16/08/2017

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

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			
F1	C3	PB Gelatins to review the maintenance checks for the dry scrubber to ensure there is early detection of the deterioration and/or effectiveness of the media.	15/09/2017
F1	C3	PB Gelatins to investigate techniques to further mitigate against the odours generated at the pumping station.	15/09/2017
F1	C3	PB Gelatins to report to NRW using the Schedule 5 Notification the root cause, and measures to be implemented, to avoid this scenario from occurring again.	15/09/2017

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.