

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	08/05/2018	Time in	13:45	Out	15:00
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	EMS and odour				
Lead officer's name	Willey, David				
Accompanied by					
Recipient's name/position	Alan Fitzpatrick/ Health and Safety Officer	Date issued	08/05/2018		

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
C2 - General Management - Management system and operating procedures	C3	1.1.1
F1 - Amenity - Odour	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	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

Site inspection on 8th May 2018

DW attended site following a complaint received directly, not through ICC, in order to substantiate the complaint. This was the second complaint received this year for the site. The first complaint was in March with NRW not attending and PB Gelatin's unable to detect and odour during their odour checks. This complaint also came through directly and not via ICC.

In response to today's complaint PB Gelatin's undertook odour checks and reported the following:

'After investigation, we could notice that the bank holiday disrupted the skip collection that takes places every Monday.'

In addition to this, the hot weather conditions over the long weekend lead to an odour release today while replacing the full skip by an empty one.

We will reviewing our procedures regarding this type of collection, in order to improve them.'

On arrival on site at 13:45 DW undertook odour checks at the following locations:

Offsite at fence line

Odour was detected along the fence line near to Keyline as well as along PB Gelatin's fence line. DW spoke with the owner of the nearby burger van who reported that the odour had been particularly bad today and had been bad for the last couple of weeks. No other complaints had been received prior to today's complaint apart from the one in March.

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

Balance tank

There was a noticeable odour around the balance tank and it was difficult to pin point the source. The balance tank itself is due to be emptied and cleaned on Sunday as part of the 4 monthly cleaning cycle. The recent warm weather could have caused some odour generation especially as now the tank is due to be cleaned as part of the on-going maintenance. Further odour checks will determine the effectiveness of the cleaning and whether the frequency is adequate.

Bone skip

As mentioned above the bone skip was filled more than normal due to the bank holiday weekend as well as an increase in production over the weekend. In addition the warmer weather further increased the odour generation with the delay in pickup causing the odour experienced off site.

The sites EMS should have foreseen this event with measures put in place to mitigate against the potential for a release of odour from this activity.

Considered to be a category 3 breach of permit condition 1.1.1 of the permit EPR/DP3030ZC.

ACTION: PB Gelatin's to review their EMS to consider arrangements over public holidays as well as considering emergency procedures where collections are disrupted.

Wet scrubber

During the inspection the effectiveness of the scrubber was tested with no odour detected from the scrubber. The

odour was detectable nearby but not considered to be associated with the scrubber.

Effluent treatment plant

There was a noticeable odour from the pumping station but it was very localised. On closer inspection the odour was more noticeable when the cleaning sprays were in operation. The pumping station is located away from the receptor with the wind blowing in the opposite direction during the visit, the pumping station is not considered to be the source of odour in this instance with active control measures in place to prevent odour generation. At the time of the inspection the hydrogen peroxide was not being dosed. On the next visit DW will undertake an inspection with the dosing in operation to determine its effectiveness.

ACTION: PB Gelatin's to undertake an assessment of the Best Available Techniques for the treatment of the waste water. The assessment should look at the techniques currently in place and justify the use and effectiveness of the existing equipment.

Further improvements at the site are currently being commissioned that will reduce the amount of odorous material being sent for treatment. The effectiveness of the screw press will become clear over the next few months.

END

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033312**

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Operator/Permit holder	PB Gelatins UK Limited	Date	08/05/2018

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			
C2	C3	PB Gelatin	31/05/2018
F1	C3	PB Gelatin	27/07/2018

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.