

Compliance Assessment Report

Report ID:
CAR_NRW0033796

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	10/08/2018	Time in	09:30	Out	11:00
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Annual Report / Odour				
Lead officer's name	Willey, David				
Accompanied by					
Recipient's name/position	Alan Fitzpatrick/ Health and Safety Officer	Date issued	14/08/2018		

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
	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	4	Total compliance score (see section 5 for scoring scheme)	16
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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

CAR Form following recent odour complaints in July / August 2018

The following complaints were received and work undertaken by NRW.

16th May 2018

Unannounced odour check by NRW.

Unannounced odour check undertaken at 16:21. Odour was detected near the PB Gelatins site pumping station but was very localised and not causing an impact off site. Odour was associated with the waste water effluent from the site.

16th July 2018

Odour complaint received. WIRs (Wales Incident Recording System) reference 1804330.

An odour complaint was received stating a foul odour that seems to be coming from PB Gelatins. NRW were unable to attend on the day of the complaint but undertook a follow up inspection on the 17th July 2018.

17th July 2018

Follow up from the odour complaint received on the 16th July 2018.

NRW attended site at 12:43 and were able to substantiate the odour complaint made by the neighbouring business. The odour checks identified the following:

PB Gelatins pumping station – faint odour

Liming pits – odour detected at fence line

Gate 3 – slight odour associated with fresh bone. Stronger odour detected by tank storage. This could be due to the internal drains.

Gate 2 – odour detected.

After speaking with the owner of the burger van he explained that the odour was particularly bad at 05:30 that morning and was also bad at 14:30 on Sunday 15th July 2018.

At 13:15 odour was detected outside of the Welsh Shop and was similar to that previously experienced from the sludge tank.

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

Following detection of the odour NRW inspected the odour abatement with staff from PB Gelatins. On closer inspection odour was detected coming from the wet scrubber outlet. Previously no odour had been detected here. PB Gelatins carry out check monitoring of the wet and dry scrubbers to ensure that the media is working correctly.

Considered to be a category 3 breach of permit condition 1.1.1 of the permit EPR/DP3030ZC where the sites preventative monitoring does not adequately maintain or monitor the scrubbers during periods of high flow.

ACTION: PB to revise their check monitoring to a more suitable time when the kit is under most strain or revise the media replacement to an annual change.

PB Gelatins informed NRW that the scrubbers are to have a health check on the 25th July 2018 with the balance tank to be cleaned out on the 29th July 2018.

ACTION: PB Gelatins to consider the option to keep the sludge cooler and limit the odour generation in the sludge tank and avoid adding strain to the scrubbers.

18th July 2018.

Odour complaint received. WIRs reference 1804394. Site not attended and not substantiated.

The caller reported a stinking odour outside again. Described as an "excretion smell". NRW were unable to attend on the day of the complaint but undertook a follow up inspection on the 19th July 2018.

19th July 2018.

Follow up from the odour complaint received on the 18th July 2018.

Unannounced odour checks undertaken by NRW. No odour detected off site with a slight odour noted by the pumping station. Further inspection was carried out on site of the abatement plant with odour detected on site only.

20th July 2018

Odour complaint received. WIRs reference 1804477.

Odour complaint was received and substantiated by NRW at the fenceline to Keyline. An odour was also detected by the old Greggs outlet by the River Taff but was not a strong odour. The owner of the burger van confirmed that the odour was bad that morning but not as bad as recent events.

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

After undertaking odour checks discussions were made with PB Gelatins with short term actions carried out to mitigate the odour ahead of the health check to be carried out of the scrubbers.

23rd July 2018

Odour complaint received. WIRs reference 1804544 and 1804531. Complaints not substantiated.

The caller reported a strong stinking odour coming from the PB site again this morning. Very pungent.

NRW did not attend site in order to substantiate the complaints. NRW were aware that the odour abatement is due a health check with the media to be replaced. The operator has identified the problem, and advised that equipment repairs will be undertaken.

26th July 2018

AWT attended site to undertake a health check of the dry and wet scrubbers. AWT confirmed that the scrubbers are operating within the specified parameters under normal loading. When the scrubbers are put under additional strain, for example whilst the sludge tanker is loading and during periods of warmer weather, more odorous gases will be generated.

ACTION: PB Gelatins to identify and put into place techniques to avoid putting the scrubbers under strain.

27th July 2018

AWT replaced the media in the dry scrubbers.

29th July 2018

Balance tank cleaned.

31st July 2018

Odour complaint received. WIRs reference 1804821. Odour complaint not substantiated.

Caller reported a terrible smell coming from PB Gelatins today.

2nd August 2018

Odour complaint received. WIRs reference 1804888. Odour complaint substantiated.

NRW attended site at 12:17 and parked outside Greggs. There was a very mild protein odour around the site to the east. There was a strong sewage smell from the pumping station next to KeyLine and from a manhole with a double triangular cover. There was a mild chemical cleaning products smell every now and then and a continuous mild protein smell.

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

On receipt of the complaint PB Gelatins investigated and did not find any malfunction in the odour abatement equipment (wet/dry scrubber, balance tank or sludge tank).

PB Gelatins stated that the pumping unit is fitted with an automatic cleaning system and it is working correctly. The pump station also has a dosing system of hydrogen peroxide to prevent odour generation, and it is also working correctly.

PB Gelatins flushed the drains to make sure there is no accumulation of odours.

3rd August 2018.

Odour complaint received. WIRs reference 1804941. Odour complaint not substantiated.

Caller reported a vile stinking odour which has been coming from the site all day.

An officer from NRW attended site and confirmed that there is an intermittent mild odour near the pumping station and burger van. NRW did not consider it necessary to come onto site and that the odour was not offensive or persistent.

10th August 2018

Unannounced visit by NRW. No odours detected.

2017 Annual returns

As required by permit condition 4.2.2 the 2017 annual report was received on the 5th February 2018.

The report indicated that there had been a dust complaint made to the site. Mitigation was put in place by the company with the area now permanently tarmacked.

Odour caused issues in July / August 2017. This continues to be high on the priority list with PB Gelatins with ongoing improvements to both the process and abatement being made.

Form sewer 1 - Received with the following comments:

Effluent is monitored by Welsh Water for billing purposes and to ensure they are within the consented limits. 12 samples were taken in 2017 with all samples within the consented limits.

Form performance 1- Received with the following comments

ACTION: PB Gelatins to explain why there has been a reduction in the solid bone waste exported from the site.

Form water usage 1 - Received with the following comments

PB Gelatins have an Abstraction Licence (no. 21/57/25/63) that limits the site to a maximum quantity of water to be abstracted to 217 m³/hr, 3150m³/day and 900,000 m³/year.

Form energy usage 1- Received with the following comments

ACTION: PB Gelatins to provide the reasons for the reduction in energy efficiency at the site.

Improvements on site include:

A new tipper lorry with a water tight to eliminate spillage during transfer.

A new screw press to recover more gelatin from the waste water reducing COD in the outgoing effluent and reducing the potential for odour generation.

Improved effluent drains

New recovered acid bulk storage tank

The site is currently going through some permit changes with Veolia taking ownership and control of the steam boilers. This is currently with the NRW permitting team.

END

EPR Compliance Assessment Report

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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 to revise their check monitoring to a more suitable time when the kit is under most strain or revise the media replacement to an annual change.	31/08/2018
F1	C3	PB to revise their check monitoring to a more suitable time when the kit is under most strain or revise the media replacement to an annual change.	31/08/2018
C2	C3	PB to revise their check monitoring to a more suitable time when the kit is under most strain or revise the media replacement to an annual change.	31/08/2018
F1	C3	PB to revise their check monitoring to a more suitable time when the kit is under most strain or revise the media replacement to an annual change.	31/08/2018

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.