

Compliance Assessment Report

Report ID:
CAR_NRW0026342

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	05/09/2016	Time in	09:30	Out	10:45
Assessment type	Audit				
Parts of the permit assessed	Odour				
Lead officer's name	Willey, David				
Accompanied by					
Recipient's name/position	Alan Fitzpatrick/ Saftey Officer	Date issued	06/09/2016		

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

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

PB Gelatins CAR Form – site visit on 5th September 2016

1. Actions from the last CAR Form
2. Odour
3. Reporting Forms

1. Actions from last CAR Form

ACTION: PB Gelatin to put in place a more permanent structure to house the secondary dosing system. – Action completed.

ACTION: PB Gelatins to modify the addition of activated Diox into the scrubber to eliminate odour from the scrubber. – Action completed.

ACTION: The diox should be left to activate the mixture for 24 hours before adding to the wet scrubber. – Action completed.

ACTION: Amines are passing through the Peacemaker (dry scrubber) and resulting in higher levels of the diox being used to eliminate the amines from final discharge. PB Gelatins to investigate the most cost effective way of abating the amines discharge. – Action completed.

ACTION: PB Gelatin to provide the annual production figure for 2014? – Action completed.

ACTION: PB Gelatin to investigate and propose techniques to ensure that foam is not generated as it enters the Welsh Water chamber. – Ongoing.

ACTION: PB Gelatins to update their drainage plan in light of the recent event and undertake an investigation of other potential historic drains on their land.

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.

ACTION: PB Gelatins to ensure all IBCs / barrels containing chemicals and raw materials are stored in appropriately bunded area. – Ongoing.

2. Odour

NRW attended site unannounced on the 5th September 2016 to undertake odour checks following complaints received the previous week on the 31st August and on the 1st September 2016. Although this complaint was not substantiated there did appear to be an odour release from site as a number of complaints were received.

As a result of these recent complaints PB Gelatins will carry out additional sniff tests by members of their staff as they walk past the A18 perimeter fence each morning between 05:45 and 07:00 and record the results.

During the visit by NRW there was a noticeable odour offsite near the corner of Gwaelod-Y-Garth Road and Taffs Mead Road at 09:35. David Willey went on site with Alan Fitzpatrick to undertake odour checks around the sludge tank, balance tank and alongside the Old Farm building on the Taff Mead Road side.

There was a strong sludge type odour near to the sludge tank and when on top of the tank the odour was quite noticeable. At the time of the visit the sludge tank was at 3% capacity.

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

ACTION: PB Gelatins to confirm when the sludge tank was last cleaned and confirm the procedures in place for the cleaning of the sludge tank.

ACTION: PB Gelatins to confirm the inspection / maintenance procedures in place for the filter associated with the sludge tank. (White filter located next to sludge tank.)

There was a noticeable odour emanating from the cone washers for the liming pits that discharge to the effluent discharge on the Taff Mead Side of the building near to the Sulphuric Acid storage tank BC11. The odour release was not constant but when it was discharging the odour was noticeable with steam evident too.

ACTION: PB Gelatins to investigate this release and the associated increase in temperature of the effluent and in the odour release.

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.

The rotary screen was inspected but was not operational during the visit. There was a build-up of odour within the building and the screen requires washing down that may help prevent the build-up of odour in the building.

ACTION: PB Gelatins to ensure the rotary screen is washed down regularly to avoid the build-up of sludge on the screen and the potential to generate odour.

END

EPR Compliance Assessment Report

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Operator/Permit holder	PB Gelatins UK Limited	Date	05/09/2016

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			
F1	C3	PB Gelatins to confirm when the sludge tank was last cleaned and confirm the procedures in place for the cleaning of the sludge tank.	31/10/2016

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.