

## Compliance Assessment Report CAR\_NRW0041892

**Permit being assessed:** DP3030ZC.

For: PB Gelatins EPR/DP3030ZC, held by PB Gelatins UK Limited

At: Unit A6 Severn Road , Treforest Industrial Estate, Pontypridd, Rhondda Cynon Taf, CF37 5SQ.

**Type of assessment carried out:** Site Inspection, Reason: Routine.

On 21/04/2023 between 10:00 and 12:30.

Parts of permit assessed: Site Inspection

**NRW Lead Officer:** Dale Padfield.

**Report sent to:** Simon Hughes, Health, Safety and Environment Manager on 26/05/2023.

### 1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
F1 - Amenity - Odour	Assessed (A)	
F5 - Amenity - Deposits on road	Assessed (A)	
A1 - Specified by permit	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

### 2. What action is required?

No action required.

### 3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

**At this time, we do not intend to take any further action.**

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

### 4. Details of our assessment

PB Gelatins

Permit EPR/DP3030ZC

A site visit was conducted on the 21<sup>st</sup> of April 2023, the purpose of which was to discuss the ongoing progress being made with the new effluent system and to conduct a general site walk over / inspection.

An update was provided on the plans for the new effluent system, PB are expecting the new system to be operational by the end of 2023 with orders already placed on various new equipment and the design and the permit variation application close to completion.

As discussed during the visit and by email, PB queried the possibility of using the spare 10-inch HDPE water main pipe that runs from the A21 production area to the old farm facility, as means to transport the A21 production effluent. PB stated that utilising this spare pipe would result in better quality effluent, the current new effluent treatment proposal is to conduct pH adjustment and to screen suspended solids >0.5mm before releasing the effluent direct to sewer. Utilising the spare watermain to transport the A21 process effluent to the primary effluent treatment plant situated at the old farm would reduce the suspended solids further and reduce the COD. Some pH balancing would be achieved through mixing of the effluent streams from both facilities, resulting in lower chemical consumption.

Ultimately, approval for this would sit with the permitting team, however, having discussed this proposal within the south-central industry regulation team, there are some points below that PB should consider if they decide on this route in their permit variation application.

- Compatibility with PB effluent: It's understood that PB contacted GPS PE pipe systems during the original proposal to use the pipe as temporary measure to transport effluent, who confirmed that the pipe should be fine to receive effluent at a temperature of 60°C up to a pressure of 5 bar. PB will also need to consider the specific make-up of the effluent and if any of the contents are likely to degrade the pipework, increase creep rate, shorten the design life, or increase the susceptibility to failure during an irregular operations or abnormal events. PB should consider undertaking a long-term compatibility test.
- Failure mechanisms: Although the pipe is suitable to receive effluent at 60°C up to a pressure of 5 bar, PB should consider the likely variability of these parameters (as well as pH and chemical composition etc) during normal and abnormal operations, and the potential for a situation to arise resulting in these parameters being exceeded and the consequences of this. The failure mechanisms need to be understood with appropriate control measures put in place.
- PB should consider the design life of the pipe and how this may be affected by its use as an effluent pipe, as the effluent composition and temperature may affect lifespan, given that its original intended purpose was to transport water. The potential for the effluent to be abrasive, especially at high pressures and at turns and bends within the pipework may need to be considered.
- Inspections / preventative maintenance. PB have suggested that regular pressure tests of the pipe to ensure the pipe is intact and not leaking. PB would also need to consider some form of inspection regime. Although pressure tests will indicate if the pipe has failed, some form of inspection would need to be in place to identify and rectify potential issues with the pipe before failure occurs.
- PB should consider undertaking an options appraisal and comparing the use of the existing HDPE pipe with what would be considered the 'best option'.

In summary, NRW would need to be satisfied that all the potential failure mechanisms have been considered, with robust controls and a sufficient inspection programme is in place and to be provided with assurance that the system is fit for purpose and resilient.

PB also queried the possibility of using industrial heating oil (IHO) as the secondary fuel source for the boiler house, to replace the use of diesel. Due to a change in the regulations of red diesel use in 2022, the secondary fuel was switched from red diesel to white, resulting in a significant cost increase for the operator.

A request was made by Veolia in December of 2022 on behalf of PB, to use IHO in place of natural gas, this request was denied as NRW believed the requested was to permanently switch from natural gas to IHO as a cost saving exercise. As stated in the response to the initial request, NRW were unable to allow an operator to switch to a more polluting fuel on a cost basis alone, and the lowest polluting fuel should be sought.

However, during the site visit, PB explained that it was not their intention to swap from natural gas to IHO, natural gas would remain their primary fuel source. The request was only to switch from diesel to IHO as the secondary fuel, and only to be used in the event of disruption to the natural gas supply. This proposal has been reviewed and is accepted; a confirmation of this acceptance will also be provided to Veolia as the permit holder of the boilers.

PB's engineering manager provided an update on the improvements planned at the facility and highlighted the proposed improved metering package for steam and water metering. An overview of data capture and utilisation for multiple parameters, water, electricity, gas, steam, raw materials ect was given. Further detail was provided on how these figures are captured at the facility and from sister plants globally, and how the data is used to set efficiency targets for each plant. It was encouraging to see the level of scrutiny applied to this data and the continued commitment of the operator to improve efficiency and environmental performance.

The visit concluded with an inspection of the exteriors of both facilities, alterations and improvements to the old farm drainage system were seen to be underway, no non-compliances were seen during the visit.

An update was provided on Action 1 – PB Gelatins 17<sup>th</sup> January 2023 from CAR\_NRW0040958. PB had conducted the CCTV survey of the drainage system and were awaiting the report. Please provide a copy of the report once it's available.

END.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

## Important information

### Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

### Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

### How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

### **What are suspended scores?**

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

**Full list of Industry and Waste action criteria (used in section 1 and 2):**

#### **A: Permitted activities**

- A1 Specified by permit

#### **B: Infrastructure**

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

#### **C: General management**

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

#### **D: Incident management**

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

#### **E: Emissions**

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

#### **F: Amenity**

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

#### **G: Monitoring and records, maintenance and reporting**

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

#### **H: Resources efficiency**

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

### **Enforcement response**

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

### **Data protection notice**

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. 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 our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

### **Disclosure of information – this report will be available to view on-line**

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

### **What do I do if I disagree with the report or have a complaint?**

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk) for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at [ask@ombudsman.wales](mailto:ask@ombudsman.wales)

### **Welsh Language Standards**

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.