

## Compliance Assessment Report

Report ID:  
CAR\_NRW0034987

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	07/03/2019	Time in	10:00	Out	14:00
Assessment type	Audit				
Parts of the permit assessed	EMS, abstraction, reporting				
Lead officer's name	Willey, David				
Accompanied by	Hayley Barrett				
Recipient's name/position	Alan Fitzpatrick/ Safety officer	Date issued	12/04/2019		

### 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

**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

## CAR Form following receipt of annual report and site inspection on the 7th March 2019

### Actions from previous CAR Form dated 14th August 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.

*Completed. PB Gelatins have considered this and concluded that it is not cost effective. With the procedures put in place for odour control at the site, and the reduction in odour complaints, this will not be taken forward at the moment.*

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

*Completed. The sludge tank whose odorous air feeds into scrubbers is monitored and maintained at 60% capacity to avoid excessive generation of odorous air. Under these normal operating scenarios the scrubbers can handle and treat the odour satisfactorily. There is the potential for excessive odorous air being pushed through the scrubbers when there are tankers loading from the sludge tank. PB Gelatins ensure that these activities take place very early in the morning to avoid the potential risk of an odour release from the site.*

### Actions carried forward

**ACTION:** PB Gelatins 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.

*Ongoing. There are now monthly checks in place of the media. The frequency of the media changed will be confirmed by PB Gelatins.*

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

*Carried forward. This action is discussed further in the Annual report section of this CAR Form.*

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

*Carried forward. This action is discussed further in the Annual report section of this CAR Form.*

## **Site update**

PB Gelatins have had a site name change and are now known as PB Leiner UK. The companies house number remains the same, 01477674, where the company is listed as PB Gelatins UK limited. There is no need for a permit variation for a site name change.

Since the last visit the combustion plant that serves PB Gelatins has been permitted with Veolia the Operator for the site. We explained that any inspections of the combustion plant will be undertaken as part of a dual site visit with prior notification provided to the site to ensure there are representatives from Veolia.

The 2 new extraction points varied into the permit are now in operation.

## **Odour update**

There has been one odour complaint received by NRW in 2019 on the 8th January and was due to an ossein pit that had recently been drained. PB Gelatins informed NRW that this natural organic material varies from load to load and occasionally there can be a more odorous batch. If this does occur there are measures in place to mitigate against the potential release of odour, on this occasion this was not actioned immediately.

**Considered a category 3 breach of permit condition 1.1.1 for general management where the procedures for odorous batches was not followed.** If the sites procedure had been followed the odour release would have been prevented off site.

The odour complaint was not substantiated.

The site is in the process of trialling a screw press installed to dewater the waste water from the extraction process. This is designed to increase efficiency at the site creating a drier sludge. The purpose of the dewatering process is to reduce COD and suspended solids in the waste water effluent and to extract any ossein not processed. Another benefit would be a reduction in the accumulation of odorous material generated.

### **Photo 1: Screw press**



PB Gelatins notify neighbouring businesses of proposed works that may lead to odour generation. The notification is done by e-mail with the works undertaken at times when the businesses are likely to be closed and when members of the public are unlikely to be in the vicinity.

## BREF update

PB Gelatins are permitted under Section 6.8 for The Treatment of Animal and Vegetable Matter and Food Industries for the disposing of or recycling animal carcasses or animal waste. These activities adhere to the reference document on Best Available Techniques in the slaughterhouses and by-products industries published in May 2005. This document has just begun its revision process with new BAT conclusions due to be published and enforced through the permits in 3 to 4 years' time.

## Waste water BAT assessment

As part of the CAR Form dated 8th May 2018 PB Gelatins were actioned to produce a BAT assessment for the treatment of the waste water on site. PB Gelatins submitted a response to this on the 8th November 2018. The site assessed their operations against the BAT conclusions with no further action required except for the following:

### *ASSESSMENT OF BEST AVAILABLE TECHNIQUES IN THE SLAUGHTERHOUSES AND ANIMAL BY-PRODUCTS INDUSTRIES*

#### *SECTION 5.1.1 GENERAL PROCESSES AND OPERATIONS*

BAT 1 - Use an environmental management system (section 4.1.1 and 5.1.1.1)

Conclusion	BAT Implementation in Progress
Action	Continue to work towards achieving 14001 accreditation for PB Gelatins Environment Management System

BAT 8 - Dry clean installations and transport by-products dry (section 4.1.12), followed by pressure cleaning (see Section 4.1.10) using hoses fitted with hand-operated triggers (see Section 4.1.9) and where necessary hot water supplied from thermostatically controlled steam and water valves (section 4.1.23)

Conclusion	BAT not fully implemented
Action	Fit hand operated triggers to all water hoses

BAT 10 - Provide and use bunds for bulk storage tanks (section 4.1.14)

Conclusion	BAT not fully implemented
Action	Install sludge tank with 110% capacity integral bund when the existing tank has reached the end of its serviceable life

### *SECTION 5.1.5 TREATMENT OF WASTE WATER*

BAT 7 - Prevent liquid seepage and odour emissions from waste water treatment tanks, by sealing their sides and bases and either covering them or aerating them (sections 4.1.43.12 and 4.1.43.13)

Conclusion	BAT not fully implemented
Action	Carry out feasibility study with a view to enclosing the open top of balance tank or aerating the balance tank

**ACTION:** PB Gelatins to consider these improvements and provide timeframes for implementation or suitable justification for not incorporating the BAT Conclusions.

### **Abstraction point inspection**

PB Gelatins have a Water Abstraction Licence to abstract water - Permit No 21/57/25/63. The audit was undertaken on the 7th March at 13:15. The permit allows for the following extraction:

- 217 cubic meters per hour
- 3150 cubic meters per day
- 900,000 cubic meters per year

A previous inspection of the abstraction point was carried out on the 12th June 2018.

### **Photos 2: Source of supply (upstream)**





**Photo 3 - Source of supply (downstream)**



**Photo 4: Point of Abstraction (Grid reference ST 0991 8717)**



There are two pumps in operation at the abstraction point, with one pump acting as backup. A visual inspection of the pumps was undertaken for deterioration and leaks. No issues were noted.

**Photo 5: Abstraction pump**



PB Gelatins discussed the washing down of the screens and the use of a third-party contractor to remove silts when required.

**ACTION:** PB Gelatins to supply the procedure that sets out the frequency of inspections, calibration, maintenance and cleaning. This should form part of the sites EMS and reflect any manufacturers requirements.



Photo 6 shows the intake location and the associated screen that is in place. There are two screens, the first is shown in photo 3 and is where the water first passes through.

**Photo 6: Means of Abstraction (Intake works)**



**Photo 7: Means of abstraction (pumps)**



PB Gelatins have a Siemens Magflow electromagnetic meter on site located near the onsite water treatment plant. The recommended location for a water meter is 20 times the pipe diameter from the pump. The water meter at PB Gelatins is located approximately 450 meters away to the south east of the abstraction point. There is the potential for water loss between the point of abstraction and the current meter



**ACTION:** PB Gelatins to investigate the potential of installing a meter closer to the point of abstraction or provide an alternative measure to demonstrate the equal amount of water at point of abstraction and at the current meter reading location.

**Photo 8: Electromagnetic meter**



**Photo 9: Electronic meter reading**



The license holder shall maintain the meter in a condition to measure quantities of water abstracted accurately and efficiently, shall calibrate it regularly, in accordance with the recommendations of the manufacturer.

The meter should be installed in line with manufacturer's instructions. Depending on the conditions of the

licence, do not put it:

- where you cannot see it
- where it will get very hot or very cold
- where vibrations or electrical interference could affect it
- where it could become corroded
- right next to a pump
- on the suction side of a pump
- near any bends or joins in a pipe
- near any changes in the width of a pipe
- near any valves or other parts that change the way that water flows in the pipe
- where the pipe will only partly fill with water

(<https://www.gov.uk/guidance/water-abstraction-how-to-make-sure-your-meter-is-accurate>)

**ACTION:** PB Gelatins to provide evidence demonstrating calibration procedures and where and how these calibration records are saved. -Please provide records of when the meter has been calibrated over the past 7 years.

**ACTION:** PB Gelatins to provide the serial number of the water meter.

**ACTION:** The licence holder shall retain evidence of current certification for inspection by NRW.

**ACTION:** PB Gelatins to provide a screen shot from the PLC system used to record the abstraction rate / volumes.

**ACTION:** Please provide hourly, daily and yearly meter readings between the day this request has been received and at least 7 years previously. This data will be used to ensure compliance with the abstraction license and limits.

Abstraction during low flow was discussed and what the sites contingency measures are in the event of low flow.

The abstraction license has a requirement under Condition 10. Further provisions stating:

*'When the flow in the River Taff as gauged by NRW at its flow gauging station at Pontypridd is equal to or less than 4.375 cubic metres per second (or 378,000 cubic metres per day) not more than 3030 cubic metres per day is authorised to be abstracted.'*

Details of Live flow levels can be accessed on NRW's website at  
<https://rloi.naturalresources.wales/ViewDetails?station=4061&lang=en>

NRW's flow and river level data on average show a level of 0.42m is equal to 4.39 cubic metres per second. Historic data has shown river levels at the Pontypridd gauging station have been below 0.42m. When river levels are below this point, abstraction will need to be reduced to 3030 cubic metres per day.

**ACTION:** PB Gelatins to provide procedures for assessing river levels during low flows and provide contingency measures.

## Site inspection

A high-level site inspection was undertaken across the site. The site has installed two new gas fired heaters, each 175kW, to heat the A18 New Farm building where the liming pits are located. The heaters generate noise locally and has not been assessed in detail. There have been no noise complaints with the heaters located away from any sensitive receptors. During the day when there is the potential for receptors the noise is not noticeable against the background noise of local traffic and operations on site.

These heaters have been installed to maintain the ambient air inside the building at a more constant temperature and is beneficial to the production process increasing efficiency. The two heaters need to be incorporated into the permit during the next permit variation.

**Photo 10: Small gas generated heater at the liming pits**



Improvements have been made to the infrastructure to reduce the potential of any accidental releases to surface water. Photo 11 below.

**Photo 11: Site improvements**





## Annual report

The annual performance report was received on the 6th February 2019. The report stated that the monitoring undertaken in line with its Welsh Water consent have all been compliant. The monitoring frequency has now been changed by Welsh Water to monthly instead of fortnightly.

There is a requirement this year (2019) for the site to review its groundwater monitoring in line with condition 3.1.3 of the permit. Also required is a review of energy efficiency as required by condition 1.2.1(b) and a review of raw material and water as required by condition 1.4.2.

The previous CAR Form had two outstanding actions that were based on last year's annual submissions. More narrative of the fluctuations in the annual returns is required.

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

*Carried forward.*

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

*Carried forward.*

There has been an increase in water usage and energy usage on site. This has led to a reduction in the amount of energy required to produce the gelatin and an increase in the amount of waste per raw material. The amount of raw material increased compared to the amount of final product that decreased leading to an increase in the amount of waste produced.

**ACTION:** Please could PB Gelatins provide some additional information into the reduction in efficiency at



the site from previous years?

**ACTION:** Please could PB Gelatins confirm whether there is measured data of the effluent leaving the site?

**END**

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0034987**

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Site	PB Gelatins EPR/DP3030ZC	Permit Ref	DP3030ZC
Operator/Permit holder	PB Gelatins UK Limited	Date	07/03/2019

### 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	Ensure procedures are followed	31/05/2019

## 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](mailto: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.