

Compliance Assessment Report CAR_NRW0042226

Permit being assessed: BB3097ZS.

For: PB Gelatins, **held by:** Veolia Energy & Utility Services UK PLC

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

Type of assessment: Report/Data Review,

Reason: Routine.

On: 01/08/2023.

Parts of permit assessed: Monitoring returns / Response to actions.

NRW Lead Officer: Dale Padfield.

Report sent to: Andrew Brown, IWE Manger, on 01/08/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR2C - Operations - Operating techniques	Assessed (A)	

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

Total 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

Veolia Energy & Utility Services UK PLC

EPR/BB3097Z

This compliance assessment report details the following:

- Response to actions issued in CAR_NRW0041725
- Response to actions issued in CAR_NRW0041828
- Review of emissions to air reports

Response to actions issued in CAR NRW0041725

The actions issued are listed below for ease of reference.

Action 1 - Veolia 05th of May 2023: Veolia to conduct an energy efficiency review to assess whether there are suitable opportunities available to improve the energy efficiency of the activities and to take further appropriate measures identified by the review. Please provide NRW with a copy of the review, along with any plan detailing the implementation of any appropriate measures identified by the review. Due 30th of June 2023.

Action 2 - Veolia 05th of May 2023: Veolia to review their current management of change procedure to ensure future compliance obligations are not impacted by changes in operational personnel. Please provide NRW with a copy of the MOC procedure once the review is complete.

Response to action 1: Veolia have submitted several documents in response to this action, the following provides a summary of these documents.

'H60075 - 134027 - PB Leiners - Efficiency Report' Provides an overview of the energy efficiency survey conducted at the facility, detailing several energy efficiency improvement opportunities that could be undertaken on the current plant / infrastructure, the main opportunities identified were:

- The replacement of lagging jackets that have come to the end of their serviceable life on all three boilers.
- The replacement of missing lagging on the hot-well tank.
- Adjustment of hotwell level control to prevent hotwell overfilling and replacement of sparge on hotwell.
- Fitting an economiser and upgrading burner with oxygen trim for boiler number two, to bring its energy efficiency in-line with boilers one and three.
- Several metering opportunities, some of which are planned to be implemented during 2023.

Please keep NRW updated on the progress made with any of the improvements identified from this survey.

Beyond the improvements opportunities identified on the current plant and infrastructure, Veolia have made a proposal to their client to investigate options to reduce energy use and increase sustainability, exploring

opportunities to invest in new plant and infrastructure. The proposal 'PB Leiner – Veolia Decarb Study Proposal – 2023.05.23 – VEOP-0013983' contains several case studies of recent projects conducted by Veolia, which show several positive improvements made across a range of industries utilising a range of technologies. Veolia have detailed the necessary steps that would need to be undertaken and have presented this to their client. It's also noted that Veolia have approached the client several times with similar proposals which the client has decided not to take any further. Please keep NRW updated with any progress made on this proposal. Action 1 is considered complete.

Response to action 2. Veolia undertook a review of their MOC procedure to ensure future compliance obligations are not impacted by changes in operational personnel. The review has resulted in Veolia undertaking a slight restructure in the midland and South Wales region, with the aim of increasing support to the contract and general managers. A regional support resource team will be available to provide technical support in all areas of health, safety, and environment. Action 2 is considered complete.

Response to action issued in CAR NRW0041828

The action issued is listed below for ease of access.

Action 1 – Veolia 12th of May 2023: Using the comments and recommendations made by NRW's geoscience team, Veolia are to submit for approval by NRW, a plan and schedule detailing how they intend to progress.

Response to action 1: Veolia provided feedback on each of the points raised by NRW's geoscience team and provided the following statement.

"ECL Report VEOL.01.02.GIR (DRAFT) will be updated as per NRW comments and Issued as Issue 1. This, and other information as listed in Points 1-8, will be used to prepare a hydrogeological conceptual site model (CSM) report that would review the source – pathway - receptor linkages based on the existing reports and site-specific data as well as a desk study review of the local hydrogeological and hydrological site setting and natural attenuation mechanisms. The overall aim of the report being to inform a programme of MNA at the site, the likely required duration for groundwater monitoring / natural attenuation and appropriate monitoring locations and schedules. The scope of the hydrogeological CSM report will be as follows:

- A. A qualitative model would be prepared, supported by simple flow/dilution calculations as required, to assess travel times to the receptor (river) and potential dilution rates. Calculations would be based on site-specific data, where available, or appropriate (conservative) published data. Potential attenuation and degradation rates within the unsaturated zone and groundwater flow pathway would also be reviewed and presented.*
- B. The report would address the key issues raised by NRW in CAR NRW0041828 and would include appropriate drawings including a groundwater level plot with inferred groundwater contours to confirm flow direction and up-gradient / down-gradient boreholes and a conceptual site model (cross-section).*
- C. Borehole datum points will be surveyed, relative to mAOD and one round of groundwater level monitoring data taken post the survey. This will allow confirmation, or otherwise that the existing boreholes are truly down-gradient of the spill zone. Clearly if none are then a new borehole would be required. We will review this as the project progresses, and update NRW as the project progresses.*

D. *The most recent groundwater quality monitoring data are from December 2022; therefore, we will include and review data from another round of groundwater sampling (to be undertaken in July 2023) within the CSM report. Future monitoring schedules and frequency would be informed by the findings of the CSM report.*

In terms of timescales, they are somewhat dependant on the availability of a suitable subcontractor to survey the boreholes, however, assuming that this can be arranged within 4 weeks of NRW approving the scope of works, we would then allow 4 weeks for the sampling of the boreholes and results to be obtained from the laboratories, and a further 4-6 weeks to compile the hydrogeological CSM report. Therefore it is anticipated that should NRW be able to respond to this email by 1st July 2023, the report could be produced by the end of September / early October (this is representative of the timescales pending NRW review). Clearly it is Veolia's intention to undertake these works as quickly as possible, however time scales have been set with contingency to allow for known delays with analytical laboratories and the inevitable delays caused by summer holidays."

The above reply was reviewed by NRW's geoscience team and accepted with no further comments. An email was sent to Veolia on the 17th of July 2023 and confirmed that NRW were happy for Veolia to commence with their proposal. It was noted that NRW's response was delayed which will likely impact on the timescales within the proposal. Please keep NRW updated with any progress made with the proposed monitored natural attenuation (MNA) works. Action 1 is considered complete.

Emissions to air reports

The reports detailing the air emissions from boilers one, two and three were received on the 05th of June 2023. As Veolia had failed to conduct the annual monitoring on the boiler during 2022, these reports will be used as a late submission for the 2022 period, with a further round of monitoring required to be conducted before the end of 2023.

The results from all three boilers were consistent with previous reports and within the range expected by Veolia. The reports are accepted.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 18:00), or email 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

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.