

Compliance Assessment Report CAR_NRW0042936

Permit being assessed: BL5644IK.

For: Sensient Flavors Ltd, **held by:** Sensient Flavors Ltd

At: Sensient Flavours, Felinfach, Lampeter, Ceredigion, SA48 8AG.

Type of assessment: Site Inspection,

Reason: Other.

On: 22/11/2023 between 10:00 and 13:30.

Parts of permit assessed: 3 Emissions.

NRW Lead Officer: Anthony Roberts.

Report sent to: Jonathon Heard, Operations Manager, on 05/12/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3C - Emissions and monitoring - Odour	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

SENSIENT SITE INSPECTION AND COMPLAINANT MEETING

HIGHLIGHTED ISSUES FROM PERMIT REVIEW AND ODOUR COMPLAINT HISTORY

FACE TO FACE COMPLAINANT AND OPERATOR MEETINGS/INSPECTION

21st November 2023

Meeting with complainants off site to discuss their issues and the different odours they have encountered. Issues include:

- Meaty smell associated with stable air conditions and temperature inversion in the Aeron Valley.
- Occurs at night also difficult to sleep with windows open.
- Sometimes a sooty smell that is more akin to poor combustion products
- Air quality concern regarding the new school being built approximately 1.5 miles East of Sensient and Volac
- Would like a review of AQ and emissions to be conducted by the company
- NRW informed complainants a site meeting and audit would take place the following day.
- Complainants informed that Permit limits odour levels have to be breached before CCS score can be applied and this has to be verified by NRW.
- Confirmed that BAT compliance would be investigated.

22nd November 2023

Site Meeting and Inspection

Present: Jonathon Heard (Operations Manager), Jacky Herment (Group Environment and compliance Manager) Andrew Morgan (Engineering Manager) Tony Roberts (NRW)

Issues Raised:

- **BAT Compliance:** NRW require proof that Sensient meet BAT and to show that the BAT requirements have met the BAT conclusions or rationale to show the equivalence. They have done research into this which shows they are not covered under the specific BAT rules but have equivalence. **ACTION: *Provide a report showing BAT or BAT equivalence for the site within 6 weeks of the date of this CAR form.***
- **CEMS:** Most permit requirements are for quarterly monitoring. There is no CEMS (Continuous Environmental Monitoring) on site. **ACTION: *Please provide a rationale for not including some continuous environmental monitoring for the key emissions to air. This would provide a much more robust picture of compliance with emission limits.***
- Odournet report was conducted in 2017. Report conclusions and summary report to be provided to NRW. Full report should be submitted to NRW and has not been disclosed to date due to commercial sensitivity. On receipt of full report NRW will ensure that it does not get placed on the Public Register and is therefore not available publicly.
- No breaches of emission limit have been reported this year. **ACTION: *Please confirm where***

monitoring returns are sent to in NRW and please ensure all future returns are copied to Tony Roberts and Julie Bradford of NRW,

- The hopper and belt arrangement shown in photo 1 below represents a source of odour which could be detected on site at some distance from the hopper. This should occur in an enclosed extractive environment to reduce potential odours off site. Note: No odours were detected off site on this occasion. **ACTION: Submit a proposal to improve the belt and hopper enclosure and addition to the internal air extraction and scrubbing system within 8 weeks of the date of this report.**

Photo 1. Hopper and Belt Discharge Point.



- Fugitive Emissions: **ACTION: Sensient to review fugitive emissions with regard to odours detected on site during the inspection and submit a short report with actions within 8 weeks of the date of**

this report.

- Hydrolysed Vegetable Protein (HVP) manufacturing has the most odour units and therefore the most likely to cause issues with fugitive or point source emissions. HVP as the most likely odour source has the spray driers evaporation wet scrubbing systems to remove odorous chemicals before discharge.
- When the drying process has stopped no odours are emitted from this area. Management report that complaints have been received when the system is on shut down
- The whole process was stopped for 10 days the week before the site inspection by NRW week 2 and 3 of November.
- **ACTION:** It would be useful to gain a better understanding of the complaint profile if the management at Sensient can inform NRW in advance of any planned plant shutdown in the future. Also NRW should be informed immediately, if there are any operational issues with scrubbers or other critical systems going forward.
- At the time of some of the complaints Sensient contend that the spray driers were shut down. **ACTION:** Sensient to submit this detail which should be matched with complaints received to demonstrate receipt of complaints whilst operations were shut down.
- Emitting odours means loss of product – only 7% losses which are collected mostly in the bag filter. They cannot have high emissions as the yield will go down.
- Please submit a copy of the latest odour management plan to NRW within 2 weeks of receipt of this report. However, the operator should check the EMS as required in condition 1 of the permit to ensure it minimises the risk of pollution. This pertains particularly to the hopper situation which requires resolution.

REVIEW OF SCRUBBING/ABATEMENT SYSTEMS

Two large scrubbing systems have been installed with the potential of a two-phase scrubbing operation. This will be considered with future emission data to see whether additional abatement measures are needed on site. This will also depend on the results of actions taken as a result of this report to reduce fugitive emissions.

Please note, permit condition 3.3 below states that: *'Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales'*

Although fugitive emission and odour was detected from the collection hopper, as detailed above, no odour was detected off site on the day of inspection. Therefore, on this occasion there is no CCS score attributable as there is no permit breach.

3.3 Odour

3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as

perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

In addition the operator should review the Odour Management Plan as required in condition 3.3.2 below and submit revised plan within 2 weeks of the date of this report as specified above.

3.3.2 The operator shall:

- (a) if notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to odour, submit to Natural Resources Wales for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
- (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

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.