

## Compliance Assessment Report CAR\_NRW0043340

**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:** 31/12/2023.

**Parts of permit assessed:** Annual Report.

**NRW Lead Officer:** Dale Padfield.

**Report sent to:** Jonathon Barwick, Contracts Manager, on 06/02/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3E - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Information - Reporting	C3 Minor	4.2.3
IR4C - Information - Notification	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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?

Criteria	Action needed	Complete by
IR4B	Ensure steam production data is accurately captured, ensure steam meters are functional.	Already completed

Compliance criteria codes are listed in the 'Important information' section below.

### 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/BB3097ZS

This compliance assessment report (CAR) details the review of the annual performance report submitted by Veolia on the 31<sup>st</sup> of January 2024.

#### Emissions monitoring

Emissions monitoring results for Boilers 2 and 3 appear to be relatively consistent with previous reports, however, Boiler 1 appear to show a significant increase in NO<sub>x</sub> emissions, the two previous monitoring campaigns indicate NO<sub>x</sub> levels between 131 mg/m<sup>3</sup> and 145 mg/m<sup>3</sup>, the most recent monitoring has recorded a result of 199 mg/m<sup>3</sup>. Although this is still within the limit given in the MCPD (currently doesn't apply) Veolia may want to investigate the cause of the increase in NO<sub>x</sub>, as any further deterioration in performance may have implications for achieving ELV's when the plant comes into scope in 2025.

#### Steam production

Veolia have been unable to provide steam production data due to on-going failures with their client's steam metering system since 2021, which were rectified in October 2023. This has resulted in Veolia being unable to report an accurate figure of the gross efficiency of the plant. Veolia have stated that the steam meters are the responsibility of their client and sit outside the boundary of their permitted operation. NRW appreciate that there have been some complications with regards to the steam metering and concerns between Veolia and their client regarding cost. However, this is a contractual issue and although the Steam metering sits outside of the Veolia permit boundary, it is a legal obligation for Veolia to record this data as Veolia are the 'operator' and holder of the environmental permit. AS previously mentioned, steam production is one of the primary functions of the installation, as such, it's not only crucial to capture this data for permit reporting requirements but also for trending plant efficiency. Evaluating plant efficiency allows for issues or improvement opportunities to be recognised, resulting in improved environmental performance. NRW are pleased to hear the steam meters are now functional, however, as no data has been obtained for 2023 the following non-compliance will be issued.

**Non-compliance:** A category 3 minor non-compliance is given for failing to accurately record annual steam production data. Permit condition 4.2.3. **It is an offence under Regulation 38(2) of the Environmental Permitting Regulations (consolidated 2016) to breach a permit condition or emission limit. Non-compliance score CCS3.**

No root cause score will be applied, as this has been assessed and recorded in CAR\_NRW0041725 and it's appreciated that this has been an ongoing issue which has now been rectified. However, it is advised that Veolia assess their permit requirements for any areas which may result in compliance difficulties due to contractual agreements etc. Although Veolia may deem that some areas of their permit are the responsibility of their client, Veolia are the legal operators of the Permit and as such, the compliance responsibility ultimately rests with Veolia.

### **Plant Performance**

In the absence of steam production data Veolia have evaluated plant performance based of gas and feedwater quantities utilised by the plant. Gas and feedwater quantities show an overall increase on the previous year but appear to be within the range of value reported since 2018. When the figures for the ratio of m<sup>3</sup> of gas per m<sup>3</sup> of feed water utilised are compared there is an apparent decrease in plant efficiency. There was an increase of 1.38 m<sup>3</sup> of gas utilised per m<sup>3</sup> of feed water when compared to 2023 figures. Veolia believe this decrease in efficiency is a result of increased reliance on the trailer boiler due to prolonged periods of maintenance during Q1 and Q2, the trailer boiler is a hire-in unit and is not fitted with a flue gas economiser, and as a result is not as efficient as on site boilers 1 & 3. When the figures for the feedwater utilised by each individual boiler, including the trailer boiler, the data indicates that that boiler No 2 (also no economiser) and the trailer boiler accounted for 33% of total feedwater use, which is reflected in the decreased efficiency reported.

### **Water Usage**

Veolia are unable to determine the exact raw water usage due to the mechanism in which the client supplies the water to Veolia, which is a mix of softened water along with returned condensate. The figure supplied for total metered water, as recorded by Veolia's client meter is 99,395 m<sup>3</sup>, which is within the range of values reported for previous years. For 2023, Veolia had no means of accurately recording the water used by the trailer boiler, and instead the water utilisation is calculated using the various data available. Veolia have stated that this issue has now been rectified and any water utilisation by a trailer boiler can now be recorded, NRW are pleased with this development.

### **Energy Usage**

Veolia have reported a consumption of 75,361 MWh of natural gas with no use of gasoil. NRW are pleased to hear that the gas connection for trailer boiler use has been completed and has resulted in no requirement to utilise gasoil during 2023. Overall energy consumption appears to have increased on the previous year, however it's appreciated that energy consumption will be a direct reflection of the demand of the client site.

### **Other site updates**

Veolia provided notification in accordance with permit condition 4.3.5 via email on the 30/01/2024 of the requirement to install a mobile steam raising boiler. The boiler is to be of identical design to that used in previous years, as such, there is unlikely to be any increased environmental risk to air quality as shown by previous modelling, with any risk further reduced as the trailer boiler can now utilise natural gas opposed to gasoil used previously. The boiler is required to supplement steam generation during emergency works to fix a breakdown of on-site boiler. This is accepted.

A programme of monitored natural attenuation (MNA) continues to be undertaken with regards to the historical sodium hydroxide spill. More details will be provided on this in a later CAR, when NRW receive the completed report.

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](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.