



**APPLICATION FOR AN ENVIRONMENTAL PERMIT  
UNDER THE ENVIRONMENTAL PERMITTING  
(ENGLAND AND WALES) REGULATIONS 2016  
(AS AMENDED)**

**APPLICATION REFERENCE PAN-024288**

**NOT DULY MADE RESPONSE –  
NOISE MANAGEMENT PLAN**



**P B GELATINS U.K. LIMITED,  
UNIT A6, SEVERN ROAD,  
TREForest INDUSTRIAL ESTATE,  
PONTYPRIDD, CF37 5SQ**

**ECL Ref: PBGE.01.09/NMP  
Date: October 2024  
Version: Issue 1**

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## ACRONYMS / TERMS USED IN THIS REPORT

AMP	Accident Management Plan
BAT	Best Available Techniques
CCTV	Closed Circuit Television
DAA	Directly Associated Activity
ECL	Environmental Compliance Limited
EMS	Environmental Management System
EP	Environmental Permit
EPRP	Emergency Preparedness and Reporting Procedure
FRS	Fire and Rescue Service
Ha	Hectares
HGV	Heavy Goods Vehicle
NGR	National Grid Reference
NIA	Noise Impact Assessment
NMP	Noise Management Plan
NRW	Natural Resources Wales
NSR	Noise Sensitive Receptor
OS	Ordnance Survey
PBGE	P.B Gelatins UK Limited
PPMR	Planned Preventative Maintenance Regime
Ramsar	The Ramsar Convention on Wetlands of International Importance
SPA	Special Protection Area
SSSI	Sites of Special Scientific Interest
the Installation	P.B Gelatins UK Limited, Unit A6, Severn Road, Treforest Industrial Estate, Pontypridd CF37 5SQ

## DOCUMENT CONTROL

Date	Version	Section	Description	Prepared by	Approved by
Oct 2024	Issue 1	All	All	ECL	

## 1. INTRODUCTION

### 1.1. Requirement for a Noise Management Plan

- 1.1.1. As part of the Natural Resources Wales (“NRW”) Not Duly Made Request for Information Letter (dated 22<sup>nd</sup> September 2024) related to P B Gelatins UK Limited (“PB Gelatins”) Permit variation (application reference PAN-024288), a Noise Impact Assessment was requested:

***Environmental Risk Assessment – Noise***

***“Your application states that it is not considered the variation will result in noise nuisance. There is not enough information in the application to support this statement. Our understanding is that the new effluent treatment system will involve a series of pumps and a static mixer which may generate noise.***

***You need to carry out a Noise Impact Assessment and provide a Noise Management Plan. Refer to Noise and vibration management: environmental permits - GOV.UK (www.gov.uk) for further guidance.”***

- 1.1.2. NRW has requested that a Noise Impact Assessment (“NIA”) is submitted as part of the variation application due to the new pumps and static mixer being installed. The impact assessment should be based on this new value, known as the ‘specific level’ in BS 4142:2014.
- 1.1.3. This NMP has been prepared in accordance with the EA online guidance ‘Noise and vibration management; environmental permits’<sup>1</sup> to justify in detail why an NIA isn’t required, and to provide detail of all the control measures in place to prevent any noise nuisance occurring.
- 1.1.4. The NMP has been prepared to demonstrate PBGE’s competence and commitment to controlling noise pollution. The NMP outlines all activities which have the potential to cause noise nuisance and details the systems and controls in place to manage that risk effectively.
- 1.1.5. The NMP addresses the following issues:
- the activities which could cause noise nuisance;
  - identification of potential Noise Sensitive Receptors (“NSRs”);
  - process controls and procedures;
  - monitoring regime;
  - emergency scenarios;
  - potential corrective actions;
  - complaints procedure; and
  - record keeping.

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<sup>1</sup> EA Online Guidance, ‘Noise and vibration management: environmental permits’, available at: <https://www.gov.uk/government/publications/noise-and-vibration-management-environmental-permits/noise-and-vibration-management-environmental-permits>, updated January 2022, accessed October 2024.

- 1.1.6. The NMP provides a management framework comprising of proactive and reactive measures to manage and control noise emissions from the Installation. This proactive approach will facilitate the ongoing development of operational procedures and controls as part of an on-going commitment to improve environmental performance. Reactive procedures will also be established within the NMP for the logging, evaluation, and implementation of corrective actions in the event of any noise related complaints being received.
- 1.1.7. PBGE understand and accept responsibility for controlling noise impact from site activities. PBGE have experience and expertise regarding listed activities after being a regulated permit operator for many years.
- 1.1.8. It should be noted that no history of noise has ever been recorded by NRW in any CAR form, nor has NRW or any other regulatory body (who regulate noise) had cause to raise concern of any noise emanating from the site.
- 1.1.9. Noise impact and control will, however, be applied to the Severn Road site to ensure noise impact is prevented and reduced, when any report arises.
- 1.1.10. It is the Plant Manager who will be responsible for overseeing the effective implementation of the NMP and ensuring compliance is maintained.

## 2. DESCRIPTION OF THE SITE AND THE PROPOSED ACTIVITIES

### 2.1. Site Location and Settings

- 2.1.1. The Installation is located at Unit A6, Severn Road, Treforest Industrial Estate, Pontypridd, Rhondda Cynon Taff, CF37 5SQ. The Installation covers an area of approximately 3.85 hectares comprising several discrete parcels of land within the northern area of Treforest Industrial Estate.
- 2.1.2. The Site Layout Plan (PBGE.01.09-01) details the Environmental Permit Boundary (outlined in green) including the proposed additional area and is provided in Section 3 of this variation application submission.
- 2.1.3. Figure 1 provides the indicative location of the Installation (red outline) within the context of the surrounding environment.

**Figure 1: Indicative Site Location**



- 2.1.4. The immediate surroundings include industrial units and commercial buildings. The residential area of Tonteg is located approximately 0.6km to the west while the residential areas of Hawthorn and Rhydfelin are located approximately 0.6km and 1km to the northwest respectively.
- 2.1.5. The River Taff is located to the northeast of the Installation, the boundary of which is approximately 20m away at the closest point.

## 2.2. Description of the Current Activities

2.2.1. The Installation is currently subject to two Schedule 1 Activities under the Environmental Permitting (England and Wales) Regulations 2016 as amended (“EP Regulations”) as detailed in Table 1 below.

**Table 1: Permitted Schedule 1 Activities**

Schedule 1 Activity	Description of Specified Activity	Limits of Specified Activity
Section 6.8 Part A1 (c)	Disposing of or recycling animal carcasses or animal waste, at a plant with a treatment capacity exceeding 10 tonnes per day of animal carcasses or animal waste or both in aggregate.	From receipt of ossein and other raw materials to the extraction and storage of gelatin.
Section 5.4 Part A1 (a) (ii)	Disposal of non-hazardous waste in a facility with a capacity of more than 50 tonnes per day by physico-chemical treatment.	From collection of process effluent to discharge to sewer, including the Dissolved Air Flotation (“DAF”) plant.

2.2.2. The Directly Associated Activities (“DAA”) currently permitted are detailed in Table 2.

**Table 2: Directly Associated Activities**

DAA	Description of DAA	Limits of Specified Activity
Storage of waste	Storage and handling of by-products and wastes generated by the process	From receipt of by-products and wastes from the process to dispatch from site.
Finished product storage	Storage of finished products	From receipt of finished products to dispatch of finished products.
Raw materials storage	Raw materials storage and handling	From receipt of raw materials to transfer to the manufacturing process.
Chemical storage	Chemical storage and handling	From receipt of materials to their use on-site or disposal off-site.



### **3. POTENTIAL SOURCES**

#### **3.1. On-Site Sources**

- 3.1.1. The potential sources of noise emissions from the Installation activities and its adjoining permitted area, are:
- heavy goods vehicle (“HGV”) movements delivering materials, such as animal bones and other raw materials, into the Installation via the gatehouse and weighbridge;
  - forklift drive-by and reversing;
  - biofilter Fans and pumps linked to the wet scrubber odour control processes;
  - pumps and static mixer which serve the effluent treatment system; and
  - other ancillary conveyors, which serve as part of the processes on site.

#### **3.2. Other Local Contributors of Noise Emissions**

- 3.2.1. The immediate setting around the Installation is industrial and commercial units. The Treforest Industrial Estate is bordered by a dense mixture of commercial and industrial units to the east, west and north.
- 3.2.2. The types of industry operating in proximity of the Installation that may contribute to the ambient sound levels in the area include a very busy waste transfer station directly adjacent, engineering fabricators, 275kv Upper Boat Substation, vehicle repair and storage, haulage supply and distribution, food manufacturing, material handling equipment supplies and materials processing.
- 3.2.3. These other local contributors of noise emissions should be considered in the event of a complaint being received at the Installation which needs to be substantiated. Community liaison and response to complaints is covered in Section 6.2 of this NMP.

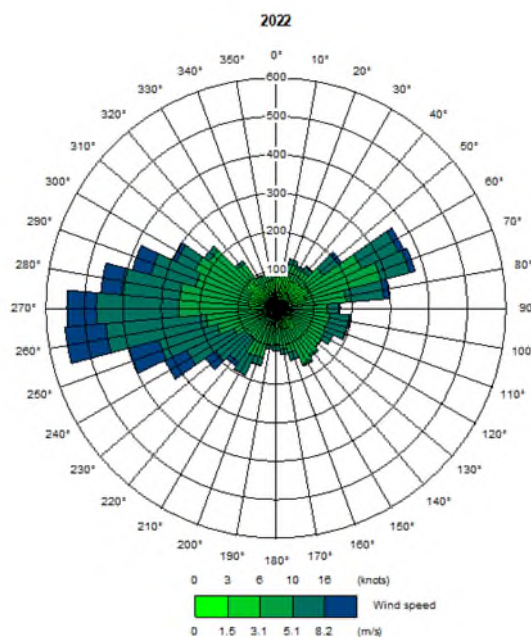


## 4. POTENTIAL SENSITIVE RECEPTORS

### 4.1. Consideration for Identifying Sensitive Receptors

- 4.1.1. To determine the severity of emission i.e., noise nuisance, which may arise from the Installation, the sensitivity of the receiving environment and potential receptors have been considered. The degree of sensitivity in a particular location is based on the characteristics of the land use, including the reason why people are at the location (e.g. for work, recreation or residence).
- 4.1.2. The noise climate can also be influenced by the meteorological conditions at the Installation and surrounding area. The nearest suitable met data available from the Meteorological Office ("Met Office") is from St Athan. This site is located approximately 21 km south-southwest of the Installation. The 2022 wind rose from St Athan Meteorological Station, is shown in Figure 2. This shows the prevailing winds are predominantly westerly with observable easterly, consequently, noise emissions are likely to be blown away from the direction of the human sensitive receptors located to the east and west to a degree.

**Figure 2: Annual Wind Rose (2022) – St Athan Meteorological Station**

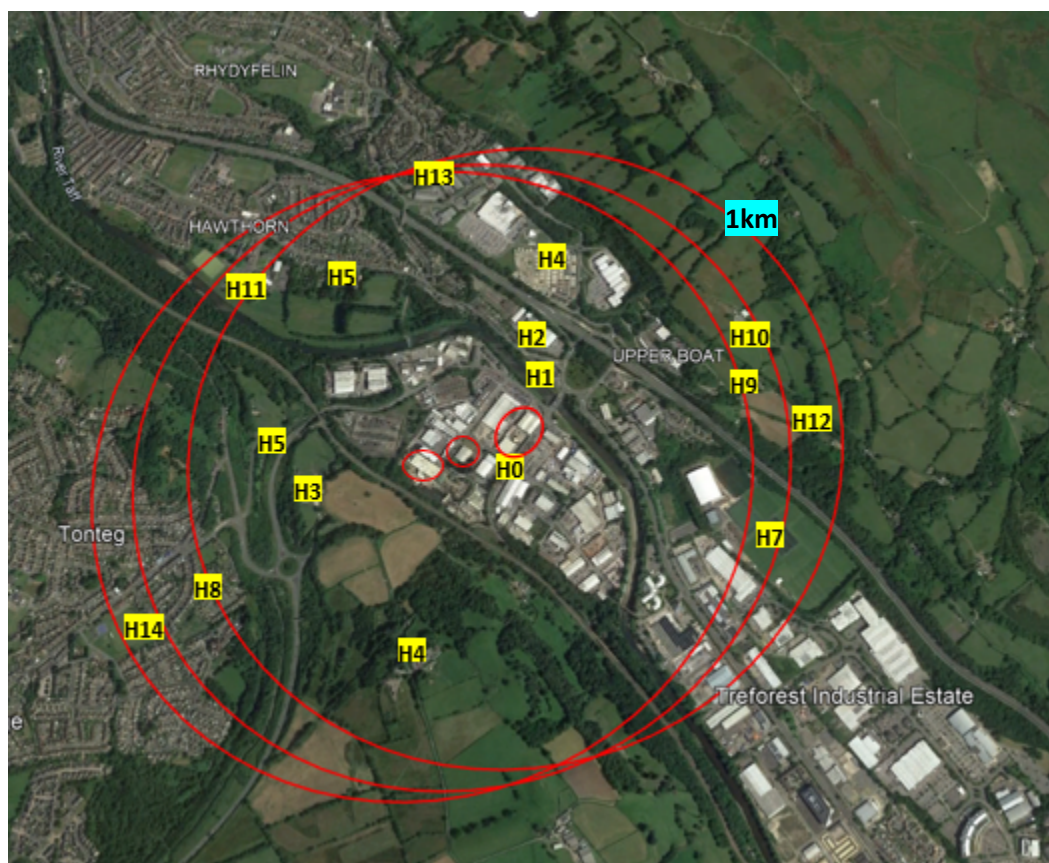


Additionally, the degree of sensitivity depends on the distance from the emission source as the closer the receptor is to the source, the higher the potential for nuisance will be at the receptor location.

- 4.1.3. It should be noted that there are receptors not highlighted here due to their own potential for noise counteracting any noise, which may emanate from the Installation and therefore would not be affected.

- 4.1.4. It should also be noted that those receptors outside of the 1km search radius are not considered likely to be affected by any potential noise emissions resulting from the Installation and therefore, are not considered further.
- 4.1.5. Potential sensitive human receptors within 1km of the EP boundary have been identified and are displayed in Figure 4 with nearest distances to the proposed Installation Boundary and direction given in Table 3. As the Installation is in discrete areas, three separate 1km circles are shown in Figure 4 to ensure all human receptors are identified within 1km.

**Figure 3: Identified Sensitive Human Receptors within 1Km of the Installation**



**Table 3: Potentially Sensitive Human Receptors within 1km of the Installation**

Ref	Name	Receptor Type	Easting	Northing	Distance from proposed EP boundary (km)	Direction
H0	Treforest Industrial Estate	Industry	310219	186755	Adjacent	E
H1	Williams Place	Residential	310484	187102	0.08	N
H2	Upper Boat Business Park	Commercial	310468	187239	0.16	N
H3	Farm – Pound Farm Lane	Farm/Commercial	309784	186746	0.26	W
H4	Gelli-Hirion Industrial Estate	Commercial	310626	187358	0.37	N
H5	Off Tonteg Road	Residential	309652	186899	0.43	NW
H6	University of South Wales Sports Ground	Educational/Recreational	311163	186607	0.46	SE
H7	Nursing Home	Residential	309831	187456	0.56	NW
H8	Tonteg Village	Residential	309562	186522	0.58	W
H9	Off Heol-Y-Bwnsi	Residential	311155	187062	0.65	NE
H10	Farm	Farm/Commercial	311111	187292	0.66	NE
H11	Hawthorn High School and Hawthorn Swimming Pool	Education and Leisure	309550	187365	0.72	NW
H12	Heol-Y-Bwnsi	Residential	311279	186931	0.78	NE
H13	Rhydyfelin	Residential	310051	187968	0.83	N
H14	Tonteg Park	Recreational	309275	186338	0.88	W

## **5. OPERATIONAL AND PROCESS CONTROLS**

### **5.1. General Control Measures**

- 5.1.1. The control measures detailed within this section of the NMP demonstrate compliance against the best available techniques (“BAT”) to prevent or, where that is not practicable, to reduce noise emissions.
- 5.1.2. The following BAT have been considered and implemented;
- appropriate location of equipment and buildings;
  - operational measures;
  - low-noise equipment;
  - noise attenuation; and
  - noise-control equipment and infrastructure.
- 5.1.3. During the conception and design phases of the Installation, the site layout and orientation, appropriate location of equipment and ancillary buildings were considered in relation to location of the nearby sensitive receptors. In addition, the use of buildings as noise screens, and to increase the distance from the emitter (Installation) to the receiver (sensitive receptors) was maximised, where this has not already been considered it will be reviewed as part of the NMP.
- 5.1.4. The internal processing at the Installation, operates (24/7); however, the delivery of raw materials, will be restricted to the following hours:
- Monday to Friday 07:00 – 16:00;
  - Saturday and Sunday 07:00 – 16:00; and
  - all bank holidays as per weekend hours except Christmas Day.
- 5.1.5. Personnel will be suitably trained to understand the conditions of the Environmental Permit and implementation of the Environmental Management System (“EMS”) which includes relevant management plans. The Installation will be managed in accordance with the EMS which will be reviewed regularly to ensure it remains appropriate and up to date.

### **5.2. Planned Preventative Maintenance Regime**

- 5.2.1. All plant and machinery will be maintained in good working order in accordance with the Planned Preventative Maintenance Regime (“PPMR”).
- 5.2.2. Any malfunction or breakdown leading to abnormal noise emissions will be dealt with promptly and operations modified or suspended until normal working practices can be restored.
- 5.2.3. Under the PPMR, machinery will be subject to pre-use and daily checks as well as regular scheduled inspections at appropriate time intervals.

### 5.3. Noise Monitoring

- 5.3.1. Operators will be trained in the prompt identification and reporting of abnormal noise generated on site.
- 5.3.2. A daily site walk over will be undertaken in which any abnormal noise or vibration issue internally or externally will be recorded, and actions raised. The noise monitoring locations will encompass all the site areas in which potential noise emitters have been identified (see Section 3.1.) and from all directions at the Installation Environmental Permit boundary (Appendix I). The noise monitoring and findings will be recorded on the Daily Environmental Monitoring Check sheet, which will form part of the EMS.
- 5.3.3. Ad hoc site safety walks and environmental audits will also be completed as part of the EMS and any actions are recorded.
- 5.3.4. Noise monitoring findings will also be discussed during monthly EHS meetings, if any arise.
- 5.3.5. Additionally, if deemed necessary, periodic boundary noise monitoring will be performed annually to determine any changes in the intensity of the sound over time.

### 5.4. Abnormal/Emergency Scenario Contingency Measures

- 5.4.1. In the event of an accident/unexpected incident such as fire, breakdown, extreme weather conditions and staff absences, the Emergency Preparedness and Response Plan (“EPRP”) and Accident Management Plan (“AMP”) highlights emergency measures will be implemented on site to manage the risk of noise emissions as shown in Table 4. In exceptional circumstances, Senior Management will discuss whether to cease part or all the site operations.

**Table 4: Abnormal/Emergency Scenario Contingency Measures**

Emergency Scenario	Contingency Measures
Extreme weather conditions – high wind, humidity and temperature	During extreme weather conditions of high wind, humidity and temperature when noise complaints are more likely due to residents opening windows and doors.
Fire/Explosion	<p>The Fire and Rescue Service (“FRS”) and the EA will be informed. PBGE personnel will be instructed to implement the emergency procedures such as those detailed in the approved Emergency Preparedness and Response Plan (“EPRP”) and Accident Management Plan (“AMP”)</p> <p>Raw materials will not be accepted at the site until operations re-commence.</p> <p>Once the site or affected area is deemed safe by the FRS, repairs will be undertaken and/or replacement equipment will be sourced. Start-up of equipment will be undertaken gradually by trained personnel to ensure optimal performance of equipment prior to full commencement of waste activities.</p>

**Table 4: Abnormal/Emergency Scenario Contingency Measures (cont)**

<b>Emergency Scenario</b>	<b>Contingency Measures</b>
Staff Absences	<p>PBGE has assigned responsible persons and deputies in the case of staff absence.</p> <p>At the start of each working day, the Site Manager will instruct the deputy in the case of staff absence to ensure all measures outlined in this NMP are undertaken.</p> <p>All employees will be fully trained in the NMP and nominated personnel are available to attend site out of normal working hours.</p>
Breakdown or malfunction of the process line and site equipment	<p>Staff will be alerted of any problems with the process and site equipment via system control panels and sounding of automatic alarms.</p> <p>Should the process or any associated site equipment fail or malfunction causing excess noise emissions, waste acceptance shall be monitored and ceased where necessary and certain processes isolated.</p> <p>Commencement of operations will only be permitted once the fault or malfunction has been rectified by qualified personnel.</p>

## **6. COMMUNITY LIAISON AND RESPONSE TO COMPLAINTS**

### **6.1. Community Liaison**

- 6.1.1. PBGE will maintain an open and transparent relationship with the local community.
- 6.1.2. Contact details are provided on the company website<sup>2</sup> including telephone numbers and a 'Contact Us' page. Site contact details will also be available from the security lodge and on a main entrance sign. PBGE welcome correspondence using these provided methods of communication. If necessary, an PBGE representative can also attend local community meetings.

### **6.2. Response to Complaints**

#### **Initial Response – Data Gathering**

- 6.2.1. If a noise complaint is received either from a member of the public or NRW, the complaint will be fully investigated within 8 working hours. The Shift Supervisor will be responsible for leading the investigation and depending on the complaint, Senior Managers from Operations, Process Control and Engineering will be involved, as well as the appropriate Shift Supervisor.
- 6.2.2. PBGE will request as much information as possible from the complainant, such as:
- date and time the problem was first identified;
  - location of complainant;
  - description of the noise to help identify the likely source of the noise; and
  - frequency and/or intensity of problem.
- 6.2.3. This information will help inform and structure the investigation to be undertaken.

#### **Noise Complaint Investigation**

- 6.2.4. The investigation will include the following:
- undertaking a site inspection to establish whether any abnormal noise emissions can be identified and reviewing the completed noise monitoring findings at the time of the abnormal noise being experienced;
  - viewing Closed Circuit Television ("CCTV") footage to determine what operations were being undertaken at the time, such as unloading, processing, vehicle movements or other raw material deliveries were occurring at the time to aim to establish the potential origin;
  - speaking with operators and any contractors on site at the time of the event who may be able to provide further information regarding the occurrence or have observed the abnormal noise emissions;

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<sup>2</sup> Company Website, available at: <https://www.pbleiner.com/en> accessed October 2024.



- reviewing the noise monitoring records to confirm inspections have been completed and to note whether any abnormal activities or observations were recorded; and
- discussions with operators to establish any changes to normal operating condition, for example, any malfunction of equipment.

#### **Noise Complaint – Corrective and Preventative Measures**

- 6.2.5. Once the investigation has been completed and the complaint substantiated, PBGE will determine and implement suitable corrective and preventative measures. The type and level of corrective and preventative measures will be dependent on the root cause and scale of the noise. Examples of the corrective and preventative measures may include:
- immediately ceasing of operations in areas of site where the abnormal noise emissions have been identified until preventative measures can be implemented; successfully;
  - review and inspect all processing equipment and systems to ensure they are operating appropriately;
  - undertake any maintenance required on equipment;
  - investigate the need for any noise abatement; and
  - further staff training on noise monitoring and control measures to be undertaken.
- 6.2.6. NRW will be informed of the noise complaint investigation findings and proposed corrective and preventative measures which have been implemented to rectify the situation.

#### **Noise Complaint – Evaluation of Corrective and Preventative Measures**

- 6.2.7. Daily housekeeping checks will be in place to ascertain whether the corrective and preventative measures above are successful in controlling and reducing noise emissions which will see a reduction in complaints. These inspections and associated findings will be recorded and reviewed during EHS Meetings.

#### **Timescales**

- 6.2.8. The timescales associated with the complaint procedures are as follows:
- investigate complaint – within 8 working hours;
  - corrective measures – immediately or where specialist contractors are required within 1-2 working days; and
  - preventative measures– within 5 working days.

#### **Feedback to Complaints**

- 6.2.9. PBGE will discuss complaint investigation findings and the associated corrective and preventative actions which have been implemented directly with the complainant.

- 6.2.10. A visit to site will be offered to the complainant to walk through the process and to discuss the measures taken to reduce noise on site.

### **Records**

- 6.2.11. NMP records are kept in accordance with the procedures established in the EMS. The type of information that will be recorded relates to:
- detailed description of the complaint received;
  - the investigation findings including root cause;
  - all corrective and preventative measures implemented; and
  - evaluation of measures and complaint close out by Senior Management.

## **7. NMP REVIEW**

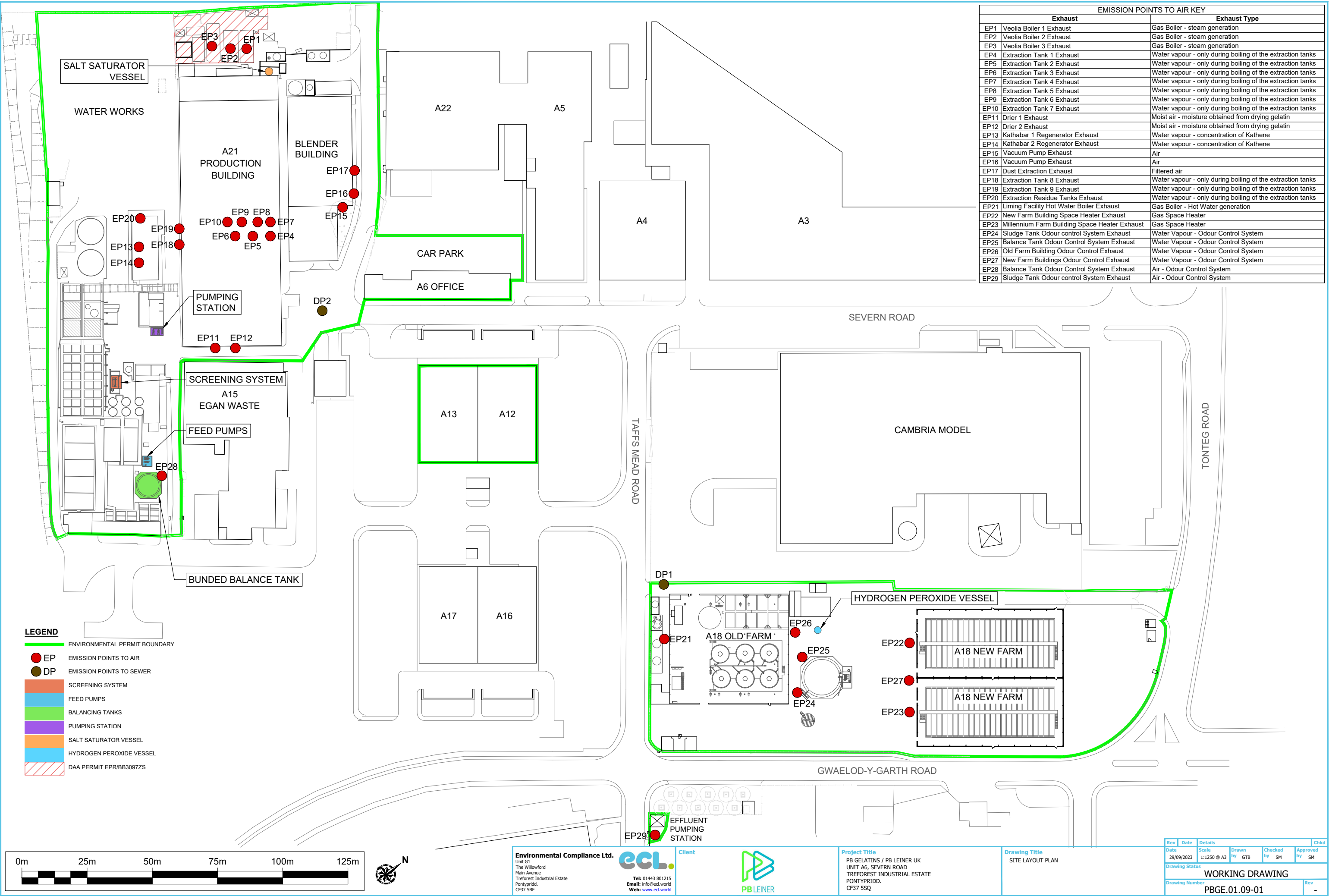
### **7.1. Frequency**

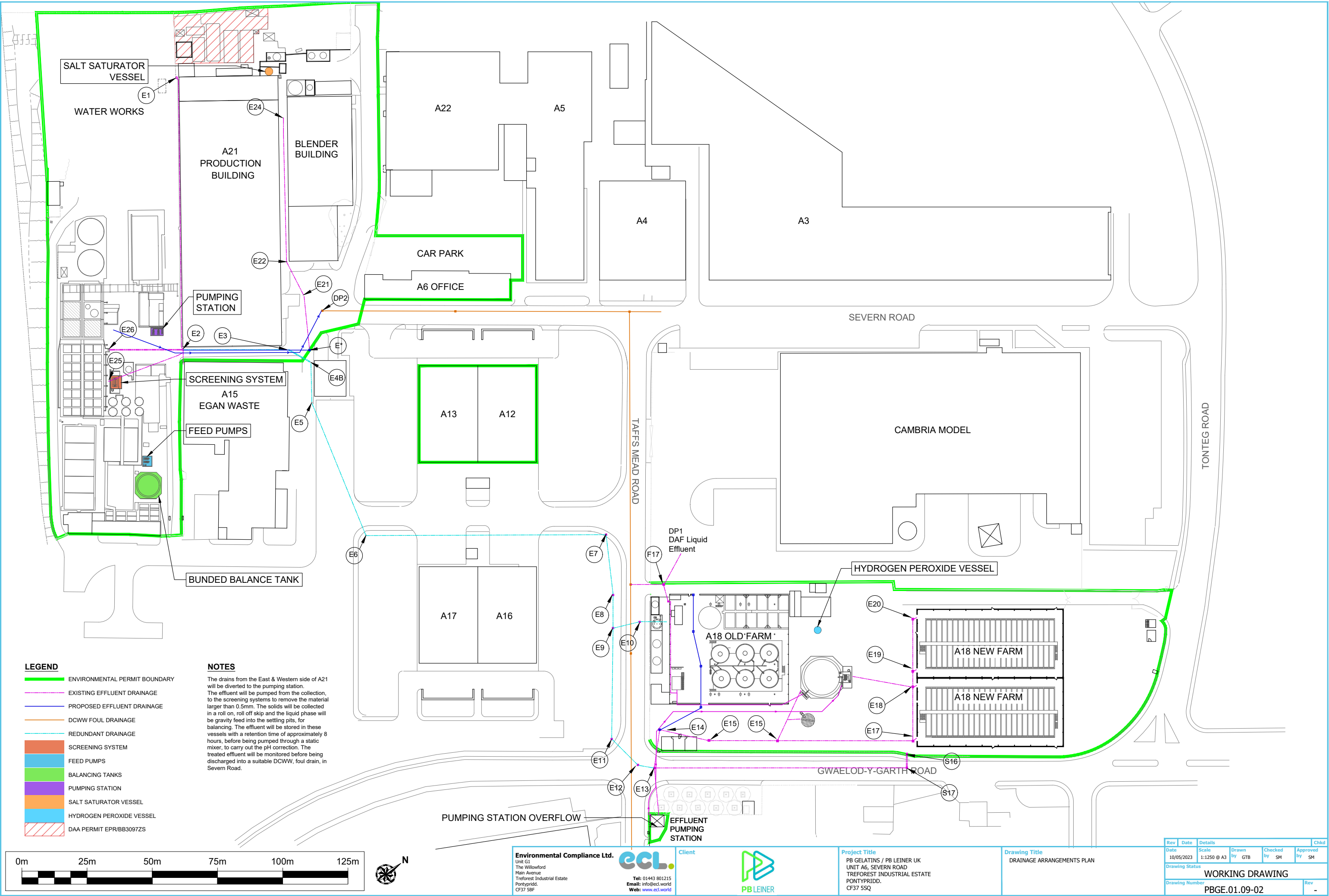
- 7.1.1. The NMP will form part of the EMS and the continuing effectiveness of the NMP will be reviewed by Senior Management annually or in the event of the following:
- any surrounding land use changes and any future developments that may increase or alter the impact;
  - any changes to site activities which have the potential to result in noise nuisance; and/or
  - if a substantiated complaint is received and it is clear control measures have failed.
- 7.1.2. The reviews will consider monitoring records, compliance records, complaints history, site records and any recent sensitive developments on neighbouring land. The plan will be amended as necessary, including any changes to the control measures.

### **7.2. Summary**

- 7.2.1. The site is regulated by NRW and has been for 10 years. The site sits in an existing industrial area and there is no history of complaints made to the company regarding noise pollution.
- 7.2.2. There are no sensitive receptors nearby and the nearest residential area to the Installation would not be impacted as it would be inaudible over the local main road and other industrial noise in proximity.
- 7.2.3. Based on the above assessment, PBGE concludes that the additional noise from the variation application will not have a detrimental effect nor add to noise in the area, this NMP has all the sufficient control measures required to deal with any reports that were received and as such a Noise Impact Assessment is not deemed justified in this instance.

## APPENDIX I DRAWINGS

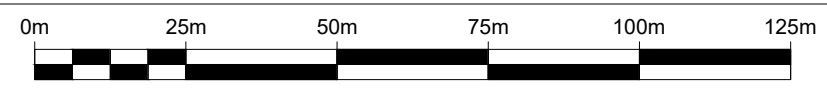




- LEGEND**
- ENVIRONMENTAL PERMIT BOUNDARY
  - EXISTING EFFLUENT DRAINAGE
  - PROPOSED EFFLUENT DRAINAGE
  - DCWW FOUL DRAINAGE
  - REDUNDANT DRAINAGE
  - SCREENING SYSTEM
  - FEED PUMPS
  - BALANCING TANKS
  - PUMPING STATION
  - SALT SATURATOR VESSEL
  - HYDROGEN PEROXIDE VESSEL
  - DAA PERMIT EPR/BB30972S

**NOTES**

The drains from the East & Western side of A21 will be diverted to the pumping station. The effluent will be pumped from the collection, to the screening systems to remove the material larger than 0.5mm. The solids will be collected in a roll on, roll off skip and the liquid phase will be gravity feed into the settling pits, for balancing. The effluent will be stored in these vessels with a retention time of approximately 8 hours, before being pumped through a static mixer, to carry out the pH correction. The treated effluent will be monitored before being discharged into a suitable DCWW, foul drain, in Severn Road.



**Environmental Compliance Ltd.**  
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Email: info@ecl.world  
Web: www.ecl.world

**Client**

**PB LEINER**

**Project Title**

PB GELATINS / PB LEINER UK  
UNIT A6, SEVERN ROAD  
TREForest INDUSTRIAL ESTATE  
PONTYPRIDD,  
CF37 5SQ

**Drawing Title**

DRAINAGE ARRANGEMENTS PLAN

Rev	Date	Details	Drawn	Checked	Approved	Chkd
10/05/2023	10/05/2023	1:1250 @ A3	GTB	SM	SM	
Drawing Status						
WORKING DRAWING						
Drawing Number						
PBGE.01.09-02						
Rev						
-						