



## ACCIDENT MANAGEMENT PLAN



**PB GELATINS (UK) LIMITED  
UNIT A6, SEVERN ROAD,  
TREForest INDUSTRIAL ESTATE,  
PONTYPRIDD, CF37 5SQ**

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## ACRONYMNS/ABBREVIATIONS IN THE TEXT

<b>AMP</b>	<b>Accident Management Plan</b>
<b>COSHH</b>	<b>Control of Substances Hazardous to Health</b>
<b>CSR</b>	<b>Chemical Storage Review</b>
<b>DC/WW</b>	<b>Dwr Cymru/Welsh Water</b>
<b>ECL</b>	<b>Environmental Compliance Limited</b>
<b>EMS</b>	<b>Environmental Management System</b>
<b>EP</b>	<b>Environmental Permit</b>
<b>EPR</b>	<b>Environmental Permit Regulations</b>
<b>ERT</b>	<b>Emergency Response Team</b>
<b>FRS</b>	<b>Fire Rescue Service</b>
<b>HSE</b>	<b>Health, Safety and Environment</b>
<b>MDSS</b>	<b>Material Safety Data Sheet</b>
<b>NRW</b>	<b>Natural Resources Wales</b>
<b>PB Gelatins</b>	<b>PB Gelatins Limited</b>
<b>The Installation</b>	<b>PB Gelatins Gelatine Manufacturing Site</b>
<b>EPRP</b>	<b>Emergency Preparedness Response Plan</b>

## DOCUMENT CONTROL

<b>Date</b>	<b>Version</b>	<b>Section</b>	<b>Description</b>	<b>Prepared by</b>	<b>Approved by</b>
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		2.1	Legislation and Guidance Documents		
		3.1	Hazard Identification		
		4.1	Site Arrangements		
		4.2	Site Management		
		5.2	Risk Assessment		
		7.1	Contact Details		
		App I	Site Layout Plan		

## 1. INTRODUCTION

### 1.1. Requirement for an Accident Management Plan

- 1.1.1. Environmental Compliance Limited (“ECL”) has been commissioned by PB Gelatins (UK) Limited (“PB Gelatins”) to produce an Accident Management Plan (“AMP”) for their gelatin manufacturing facility, hereafter referred to as “the Installation” located on Unit A6, Severn Road, Treforest Industrial Estate, Pontypridd, CF37 5SQ.
- 1.1.2. This document takes account of current legislation and regulatory guidance, current practices at the Installation, and the changes proposed as part of the permit variation application.
- 1.1.3. This AMP relates only to the activities undertaken by PB Gelatins permitted by Environmental Permit (“EP”) EPR/DP3030ZC. The AMP also considers and addresses the potential risks resulting from the proposed variation proposals (application reference PAN-024288).
- 1.1.4. The AMP forms part of PB Gelatins’ Environmental Management System (“EMS”) and the AMP will be reviewed at least every 2 years or as soon as practicable after an accident or after a significant change at the Installation. The AMP identifies potential hazards on site and the control measures in place to prevent or minimise the consequences of these occurring on site.
- 1.1.5. The Emergency Preparedness Response Plan (“EPRP”, Document Reference SHE 012) should be read in conjunction with this AMP which details the appropriate response procedures in the event of an accident/incident.
- 1.1.6. PB Gelatins ensure that suitable measures are in place to communicate the AMP to all employees, management and contractors who work at the site; the AMP details:
- the arrangements for response to an emergency, including defining specific responsibilities, and be in-line with the Emergency Preparedness Response Plan (“EPRP”)
  - the measures for dealing with the consequences of an incident,
  - communicating with NRW and other relevant regulatory bodies,
  - communicating with the Installation’s neighbours and the local community,
  - the measures for investigating incidents (and near-misses), including identifying suitable corrective action and following up implementation of that action,
  - the measures for recording incidents (and near-misses),
  - the measures for reporting incidents (and near misses) to Senior Management, and
  - the measures for reporting incidents to NRW;
  - ensuring that there are documented procedures for carrying out internal audits; these describe how to schedule, conduct, report and manage internal audits;
  - ensuring that there is a documented contingency plan in place that ensures compliance is maintained with all Permit conditions and operating procedures during maintenance/shutdown at the Installation or elsewhere.

- 1.1.7. The next anticipated scheduled review is September 2026. The AMP will be reviewed sooner in the event of an accident or incident occurring on site or if instructed to do so by NRW.
- 1.1.8. The Health, Safety and Environment (“HSE”) Manager will be responsible for ensuring the AMP is effectively implemented and is reviewed and communicated appropriately.

## 2. CURRENT GUIDANCE FOR ACCIDENT MANAGEMENT PLANS

### 2.1. Legislation and Guidance Documents

2.1.1. **European Legislation** – The following European Legislation have been considered in the preparation of this AMP:

- the Industrial Emissions Directive (“IED”) is intended to be a single legislative instrument to control pollution to air, water and land and set challenging industry standards. The established environmental principles and EU environmental law continues to have effect in UK law, therefore, the requirements of IED will therefore be considered relevant at this time;
- BAT 1 - the Best Available Techniques (“BAT”) Reference Document (“BRef”) for Slaughterhouses and Animal By-products (2024); and
- BAT 1, Point XIII - the BRef for Waste Treatment (October 2018) will be considered for the effluent treatment.

2.1.2. **National Legislation** – The Natural Resources Wales (“NRW”) guidance documents or Environment Agency online guidance adopted by NRW that are relevant to the activities undertaken at the Installation which have been taken into consideration during the preparation of this AMP include the following:

- *NRW How to Comply with your Environmental Permit (Version 8, October 2014) – ‘Accidents and Incidents’;*
- EA online Guidance (adopted by NRW) – ‘*Risk assessments for your environmental permit*’ (Updated November 2023); and
- EA online guidance (adopted by NRW) – ‘*Develop a management system: environmental permits, Section ‘Accident Prevention and Management Plan’*’ (Updated April 2023);

### **3. IDENTIFICATION OF HAZARDS**

#### **3.1. Hazard Identification**

- 3.1.1. An environmental risk is posed by any activity which could harm the environment or human health. For a risk to be realised, three separate factors must be in place, namely:
- a source of pollution or hazard;
  - a receptor that can be affected by that source of pollution; and
  - a pathway between the source and the receptor.
- 3.1.2. Table 1 details each of the potentially hazardous occurrences that could occur at the Installation and the associated pathways by which the hazard could impact on a receptor (environmental or human).

**Table 1: Potentially Hazardous Occurrences**

Operational Process/Activity	Hazard	Pathway(s)	Receptor(s)
Chemicals/raw materials during delivery, offloading, storage and handling	Spillage or loss of containment on site during delivery, offloading, storage, or handling.	Overland routes across the site surface and percolation into the ground. Via drainage network	Ground and Groundwater Surface water - River Taff Cardiff East – Cardiff Bay Wastewater Treatment Facility
Processing activities	Release of unabated/uncontrolled emissions to air	Release of gases/vapour to the atmosphere – windblown dispersion.	Human population and sensitive ecological receptors in the surrounding area.
Transportation of waste material off site.	Spillage of waste from transportation vehicles.	Overland routes across the site surface and percolation into the ground.	Ground and Groundwater Surface water - River Taff Cardiff East – Cardiff Bay Wastewater Treatment Facility
Operation of Effluent Treatment Plant	Equipment /system failure resulting in uncontrolled release/breaches of effluent discharge consent parameters	Via the effluent drainage system.	Cardiff East – Cardiff Bay Wastewater Treatment Facility
	Failure of underground pipework resulting in uncontrolled release	Percolation into the ground Via surface water drainage network	Ground and Groundwater Surface water - River Taff
Major fire.	Products of Combustion - smoke emissions from burning of chemicals, raw materials, waste, and infrastructure.	Release of gases/vapour to the atmosphere – windblown dispersion.	Human population and sensitive ecological receptors in the surrounding area.
	Potentially contaminated firewater runoff.	Overland routes across the site surface and percolation into the ground. Via drainage network	Cardiff East – Cardiff Bay Wastewater Treatment Facility Surface water - River Taff. Ground and Groundwater.
Flooding	Loss of raw material, product and potentially polluting substances	Overland routes across the site surface and percolation into the ground. Via drainage network	Human population and sensitive ecological receptors in the surrounding area. Cardiff East – Cardiff Bay Wastewater Treatment Facility Surface water - River Taff. Ground and Groundwater.
Vandalism.	Any of the above.	Any of the above.	Any of the above.



## **4. RISK REDUCTION MEASURES AND ACCIDENT MANAGEMENT ARRANGEMENTS**

### **4.1. Site Arrangements**

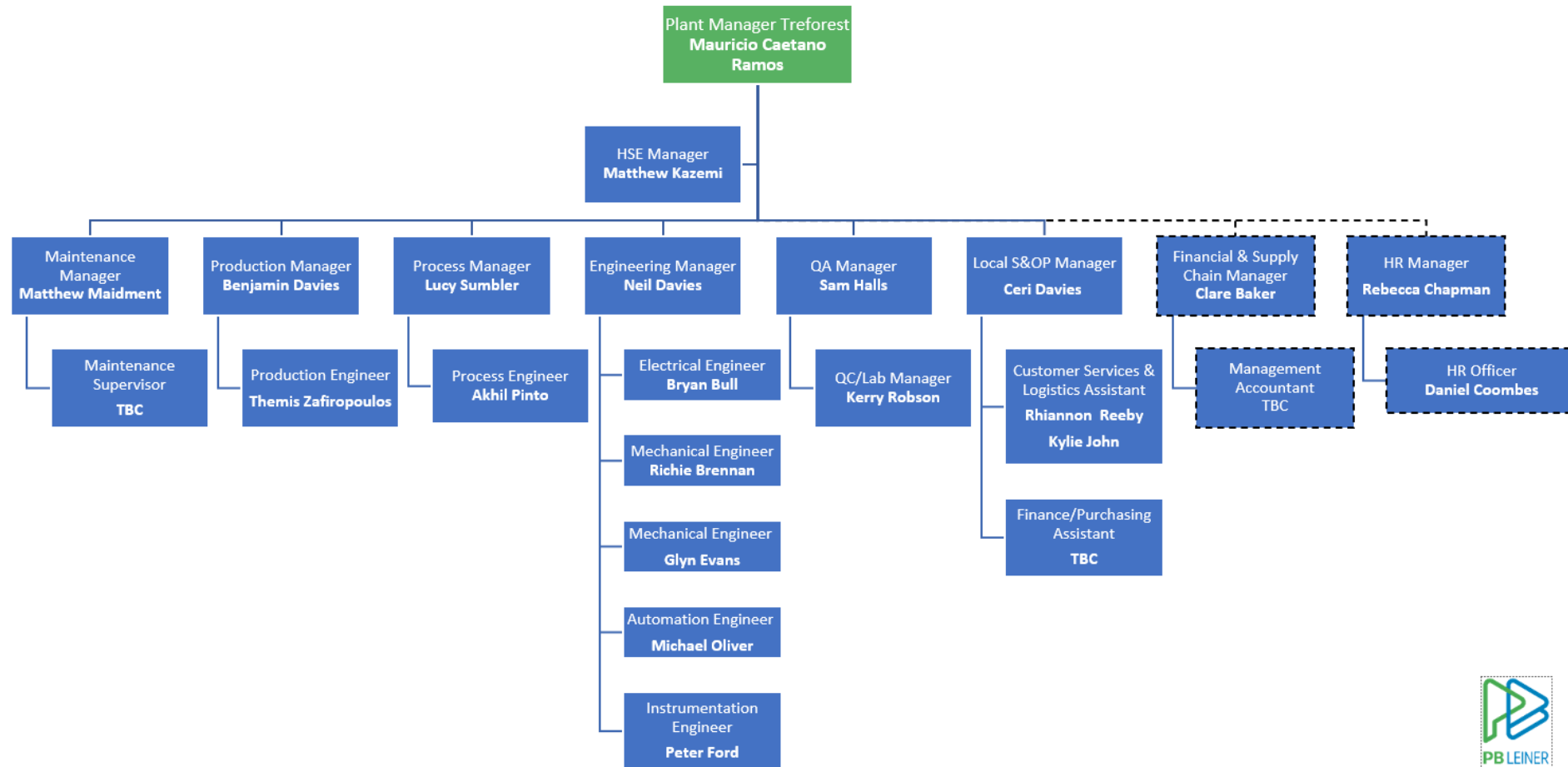
- 4.1.1. The accident management arrangements in place at the Installation are based on a combination of robust management procedures, suitable process control measures and appropriate physical infrastructure.
- 4.1.2. The exact location of the Installation is provided on the Site Layout Plan (PBGE.01.09-01) (contained in Appendix I) which also illustrates the layout of the Installation including the infrastructure arrangements, chemical and raw material storage, and processing areas (subject to the Permit variation being determined).

### **4.2. Site Management**

- 4.2.1. PB Gelatins operate an EMS, which addresses environmental aspects of the activities at the Installation. The EMS systems in place are a work in progress and working towards full alignment with all elements of the international environmental management standards BS EN ISO 14001:2015.
- 4.2.2. PB Gelatins' Organogram reveals the structure of the organisation and the different positions which can be seen in Figure 1.

Figure 1: PB Gelatins Organogram

## Plant Management Team Treforest, UK



### **4.3. General Control Measures and Procedures**

- 4.3.1. PB Gelatins recognises that planned preventative maintenance is essential for ensuring that site equipment and infrastructure are maintained in good condition. In turn, such maintenance will reduce the risk of avoidable accidents taking place.
- 4.3.2. Accordingly, there is a comprehensive EMS at the Installation to ensure that all plant and infrastructure are kept in suitable condition and operating effectively.
- 4.3.3. The Installation undergoes daily, and weekly housekeeping and infrastructure inspections recorded spreadsheets and held on the 'SAP' system.
- 4.3.4. Maintenance is only undertaken by suitably trained and qualified personnel and details of all maintenance carried out are recorded. Specific environmental training is also provided as part of the PB Gelatins' induction programme.

### **4.4. Substance Inventory**

- 4.4.1. PB Gelatins maintains an up-to date inventory of substances used at the Installation. This contains all approved raw materials/chemicals used at the Installation and their appropriate use. The Material Safety Data Sheets ("MSDS") for each chemical are held on record. The data is compiled as part of the Installation's Control of Substances Hazardous to Health ("COSHH") system.
- 4.4.2. The list of chemicals will be reviewed annually. The inventory will be updated by means of incoming receipts of chemicals and oils and the subsequent issuing of chemicals/oils to individual users/areas of use.
- 4.4.3. A Chemical Storage Register ("CSR") has been updated (and the register is referred within the EPRP) which relates to the current activities. The main bulk of raw material input to the Installation consists of small chippings/shavings of animal bone known as Ossein, which are subjected to various chemical processing techniques within the 'old farm' and 'new farm' buildings, including the addition of lime and other caustic and acid solutions, before being transported to the 'production and blender building' for further physical and chemical processes are undertaken to complete the production of gelatin. The EPRP should be read in conjunction with this document.
- 4.4.4. The full list of chemicals and raw materials used and stored at the Installation is described in the CSR including delivery, transfer storage and handling techniques for all chemicals.

## **5. ASSESSMENT OF RISKS ASSOCIATED WITH THE ACTIVITIES**

### **5.1. Risk Assessment Approach**

- 5.1.1. The risk assessment is based on the Source – Pathway – Receptor approach described in Section 3.1. of this AMP.
- 5.1.2. Factors which have been considered in the preparation of the risk assessment are:
- the likely frequency of occurrence of the event;
  - the nature and quantities of any potentially harmful substances that could be released to the environment;
  - the environmental fate of any such substance released, considering the pathways and potential receptor(s);
  - the magnitude – i.e. the seriousness of the effects of any such releases on the potential receptors identified; and
  - the risk reduction and control measures in place at the Installation that could mitigate both the likelihood of such an event occurring and the effects of any substances that may be released.

### **5.2. Risk Assessment**

- 5.2.1. The activities at the Installation which could result in accidents or abnormal operations causing unplanned potentially harmful releases to the environment are identified in Table 2.
- 5.2.2. For each activity or event, the associated hazards have been identified, together with an assessment of the risk posed by the hazard; the associated risk reduction and mitigation measures in place at the Installation are also described.

**Table 2: Risk Assessment**

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Spillage or loss of containment of raw materials and chemicals during delivery, offloading, storage and handling	Overland routes across the site surface and percolation into the ground.	Ground and Groundwater  DCWW Cardiff East wastewater treatment plant and subsequently controlled waters (Severn Estuary)  River Taff	<p>PB Gelatin conducts a frequent service road inspection ensuring the service road is maintained at a high standard to minimise the likelihood of spillage or loss of containment during transportation and delivery.</p> <p>Barriers and signage are in place to prevent the risk of vehicle collision with storage vessels and bunding for both delivery vehicles and site plant.</p> <p>Department Area Managers are responsible for ensuring competent PB Gelatins personnel always supervise deliveries. Storage vessel levels are checked prior to unloading to prevent overfilling.</p> <p>The Installation benefits from impermeable surfacing to prevent any downward migration of potentially pollution substances entering the ground or groundwater.</p> <p>All vessels containing potentially polluting material will be appropriately bunded to 110% of the volume of the largest container or 25% of the total volume stored, whichever is greater.</p> <p>Integrity checks and maintenance of pipework, tanks and bunds will be undertaken as part of the Company's EMS.</p> <p>Integrity testing of all storage vessels is undertaken by a qualified engineer annually to reduce the likelihood of tank failure or loss of containment. Any remediation action or repairs will be actioned immediately. If it is established that tank integrity is compromised and cannot be repaired, new tanks will be purchased and installed.</p> <p>All PB Gelatins personnel and contractors must attend inductions in which they are trained in appropriate handling of potentially polluting material to ensure correct handling in relation to their specific job role or function.</p> <p>The effluent drainage network can be isolated to prevent any uncontrolled releases to sewer. The spillage can then be tankered offsite to an appropriately licenced facility or installation.</p>	<p>Low.</p> <p>Risk management measures should prevent release from identified receptors.</p>	<p>Contamination of ground and groundwater.</p> <p>Contamination of DCWW Cardiff East wastewater treatment plant and subsequent contamination of controlled waters (Severn Estuary)</p> <p>Contamination of surface water - River Taff</p>	<p>Not significant if risk management measures are strictly adhered to.</p>

**Table 3: Risk Assessment**

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Spillage or loss of containment of raw materials and chemicals during delivery, offloading, storage and handling	Overland routes across the site surface and percolation into the ground.	Ground and Groundwater  DCWW Cardiff East wastewater treatment plant and subsequently controlled waters (Severn Estuary  River Taff	Regular site inspections are undertaken to observe any spillages and to inspect bund integrity. Any remedial action required is recorded electronically and saved within the environmental folders on the company server and discussed during monthly EHS meetings.  Loss of containment will be dealt with in accordance with the Installation's robust spill response procedure which is detailed within the Emergency Preparedness and Response Plan ("EPRP").  Relevant employees are suitably trained in the spill response procedure and the rapid deployment of spill kits which are strategically located throughout the Installation. Spill kit inventory is checked during the site inspections and contents replaced in line with manufacturer instructions.	Low.  Risk management measures should prevent release from reaching identified receptors.	Contamination of ground and groundwater.  Contamination of DCWW Cardiff East wastewater treatment plant and subsequent contamination of controlled waters (Severn Estuary  Contamination of surface water - River Taff	Not significant if risk management measures are strictly adhered to.

**Table 4: Risk Assessment (Cont.)**

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Release of unabated emissions to air	Release to Air – windblown dispersion in atmosphere.	Human population and sensitive ecological receptors in the surrounding area.	<p>All activities are undertaken in accordance with the manufacturer manual and instructions and Standard Operating Procedures.</p> <p>Servicing and maintenance is undertaken as part of the planned preventative maintenance regime by competent and qualified personnel. This ensures optimal performance and to instigate any maintenance/tuning if deemed necessary.</p>	<p>Low</p> <p>Risk management measures should prevent unauthorised releases from reaching the identified receptors</p>	Air Pollution	Not significant if risk management measures are strictly adhered to
Spillage of waste from transport on vehicles	Overland routes across the site surface and percolation into the ground.	<p>Ground and Groundwater</p> <p>DCWW Cardiff East wastewater treatment plant and subsequently controlled waters (Severn Estuary</p> <p>Surface Waters - River Taff</p>	<p>Department Area Managers are responsible for ensuring competent PB Gelatins personnel supervise waste collections at all times.</p> <p>Waste collections are scheduled to prevent any accumulation of waste on site which would need to be removed in greater quantities.</p> <p>The Installation benefits from impermeable surfacing to prevent any downward migration of potentially pollution substances entering the ground or groundwater.</p> <p>Loss of containment will be dealt with in accordance with the Installation's robust spill response procedure which is detailed within the Emergency Preparedness and Response Plan ("EPRP").</p> <p>Relevant employees are suitably trained in the spill response procedure and the rapid deployment of spill kits which are strategically located throughout the Installation. Spill kit inventory is checked during the site inspections and contents replaced in line with manufacturer instructions.</p>	<p>Low</p> <p>Risk management measures should prevent unauthorised releases from reaching the identified receptors</p>	Air Pollution	Not significant if risk management measures are strictly adhered to

**Table 2: Risk Assessment (Cont.)**

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Equipment /system failure resulting in uncontrolled release/ breaches of effluent discharge consent parameters.	Site drainage system, possibly overland routes across the site surface and percolation into the ground.	DCWW Cardiff East wastewater treatment plant and subsequent contamination of controlled waters  Potentially groundwater and surface waters-River Taff	<p>The use of raw material and the required quantities within the process are strictly controlled ensuring excess chemicals will not be discharged into the effluent. A raw material review is undertaken annually which includes identification and evaluation of any replacement raw materials with improved environmental profiles.</p> <p>The effluent from A18 is collected by a series of drains in all areas of the plant and transferred to an effluent pumping station adjacent to the Liming Process. From the collection sump the effluent is screened to a balance tank. Particles of ossein waste screened out at this stage are collected in a skip and are disposed of via a rendering plant.</p> <p>The effluent captured in A21 processing is directed and captured within a new below ground stainless steel tank of 30m<sup>3</sup> capacity. It is appropriately banded to ensure that any loss of containment is captured and will not enter the ground or groundwater. The pumping chamber will benefit from two radar level sensors.</p> <p>The proposed settling/balancing tank of 400m<sup>3</sup> capacity has been purchased new and be appropriately banded (111.75% capacity) as part of the effluent system improvement project.</p> <p>The effluent is then be pumped by two stainless steel pumps from the collection to the screening system (two 0.5mm screening system). The pH is monitored prior to screening, in addition to flow.</p> <p>The solids generated via the screening process are collected and removed offsite and the liquid phase will be pumped (duty and standby pumps per screen) to a new banded settling tank for balancing (natural pH correction).</p>	<p>Low.</p> <p>Risk management measures should prevent release from reaching identified receptors.</p>	Contamination of DCWW Cardiff East wastewater treatment plant and subsequent contamination of controlled waters (Severn Estuary)	Not significant if risk management measures are strictly adhered to.



**Table 2: Risk Assessment (Cont.)**

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Equipment /system failure resulting in uncontrolled release/ breaches of effluent discharge consent parameters (Cont.).	See above	See above.	<p>A new bunded settling/balancing tank has been installed under a permanent roof structure. The effluent is held in the new bunded balancing tank, which has an effluent storage retention time of approximately 8 hours, and benefits from an aeration system, before being pumped using above ground centrifugal pumps through an in-line static mixer for pH correction. The pumps and static mixer are located within a kerbed concrete area connected to the pumping station.</p> <p>All site tanks, bunds, Chemiguard units and tertiary containment is inspected weekly and recorded. External integrity inspections are carried out annually.</p> <p>PB Gelatins personnel are capable of identifying, holding and preventing the release of any materials should equipment fail, and the effluent not being fully treated. There will be excess capacity (40%) to ensure a buffer capacity is available as part of the proposed effluent treatment activities.</p> <p>pH monitoring will be undertaken at three points in the new effluent treatment process ensuring the effluent will be within consented limits. An autosampler is also be used to monitor process parameters and ensure compliance against Trade Effluent Consent limits. Flow meter and flow controls are also installed. Analysis of discharge treatment effluent is undertaken externally by DCWW on a monthly basis.</p>	<p>Low.</p> <p>Risk management measures should prevent release from reaching identified receptors.</p>	See above.	Not significant if risk management measures are strictly adhered to.

**Table 2: Risk Assessment (Cont.)**

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Equipment /system failure resulting in uncontrolled release/ breaches of effluent discharge consent parameters (Cont.).	See above	See above.	<p>PB Gelatins operate a planned preventative maintenance regime, which is the electronic system 'SAP', which is used to record and include a test schedule against all critical equipment that has the potential to lead to an environmental incident should the equipment fail.</p> <p>PB Gelatin staff are trained to deal with system failures and any related spillages and follow the spill procedure which forms part of the EMS on site.</p>	<p>Low.</p> <p>Risk management measures should prevent release from reaching identified receptors.</p>	See above.	Not significant if risk management measures are strictly adhered to.
Failure of underground pipework resulting in uncontrolled release	Site drainage system and percolation into the ground	Groundwater and surface waters – River Taff	<p>The Installation benefits from impermeable surfacing to prevent any downward migration of potentially pollution substances entering the ground or groundwater.</p> <p>Stainless steel pipework has been installed to reduce the risk of pipe failure.</p> <p>Frequent pipework inspections will be undertaken as part of the planned preventive maintenance regime to ensure condition of the pipework is constantly monitored and any deterioration is identified and rectified immediately.</p>	<p>Low.</p> <p>Risk management measures should prevent release from reaching identified receptors.</p>	<p>Contamination of ground and groundwater.</p> <p>Contamination of surface water - River Taff</p>	Not significant if risk management measures are strictly adhered to.

**Table 2: Risk Assessment (Cont.)**

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Major system failure/loss of process control.	Overland routes across the site surface and percolation into the ground.	Potentially the groundwater in the vicinity of the spill	<p>Competent PB Gelatins personnel are always present on-site during processing activities at the Installation.</p> <p>The process equipment benefits from alarms and controls which enable any malfunctions to be identified immediately. Emergency stop buttons can also additionally halt the process including the effluent treatment equipment immediately in the event of serious failure or faults occurring. PB Gelatins personnel can identify, holding and preventing the release of any materials should equipment fail.</p> <p>The documented planned preventative maintenance regime will detail the required maintenance and inspection of all proposed process equipment to ensure good working order to reduce the risk of a complete system failure.</p> <p>In the event of a major system failure, all affected operations will cease. The Engineering Manager will co-ordinate an investigation to identify and rectify the problem with all actions documented. Faults will be addressed, and repairs undertaken where necessary using specialist contractors.</p> <p>Competent personnel will check all areas prior to the recommencement of operations</p>	Low. Risk management measures should prevent release from reaching identified receptors.	Contamination of ground and groundwater in the vicinity of the spill	Not significant if risk management measures are strictly adhered to.

**Table 2: Risk Assessment (Cont.)**

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Fire	Release of gases/vapour to air.	Human population and sensitive ecological receptors in the surrounding area.	<p>A Fire Risk Assessment (“FRA”) is undertaken annually. The purpose of which is to evaluate and to remove/minimise the fire risk by implementation of relevant control measures.</p> <p>Regular inspections and preventative maintenance on all equipment is undertaken to prevent any faults occurring which may lead to a fire. Moreover, designated smoking areas are in place with smoking prohibited in all buildings.</p> <p>Fire-fighting equipment, such as fire extinguishers, are in strategic positions throughout the Installation and inspected on an annual basis. Nominated personnel are trained in the appropriate use of fire extinguishers.</p> <p>Procedures for the reporting and management of incidents and potential emergency situations including fire have been developed. These procedures are outlined in the Emergency Preparedness and Response Plan (“EPRP”) which forms part of the EMS.</p> <p>Evacuation drills are undertaken twice annually to ensure all staff are aware of the emergency procedures. Site Incident Commanders and support teams are allocated and trained appropriately in the management of incidents including fire response.</p> <p>The HSE Manager has overall responsibility for the review and implementation of the Installation emergency procedures and training the Site Incident Commanders and Support teams in their responsibilities.</p>	<p>Medium.</p> <p>Risk management measures should prevent release from reaching identified receptors.</p>	Smoke, localised nuisance.	Not significant if risk management measures are strictly adhered to.

**Table 2: Risk Assessment (Cont.)**

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Potentially contaminated firewater runoff	Overland flow and via drainage network on site.	Ground and Groundwater  DCWW Cardiff East wastewater treatment plant and subsequently controlled waters (Severn Estuary)  River Taff	<p>Potentially contaminated firewater will be appropriately contained and tested prior to disposal.</p> <p>Depending on the scale of the fire and the volume of firewater to be contained, booms, bunds and drain mats will be used to capture small volumes of firewater.</p> <p>The effluent treatment plant capacity can also be utilised to capture greater volumes of firewater. The effluent system will be isolated from the public sewer to prevent discharge and to ensure the potentially contaminated firewater is held prior to sampling and analysis. Discussions will then be held with DCWW to gain agreement to discharge the firewater to public sewer or it will be tankered off site to an appropriately licensed facility or installation for treatment and disposal.</p> <p>Drain mats will be deployed in order to prevent any firewater from entering any surface water drains.</p>	<p>Medium</p> <p>Risk management measures should prevent any release from reaching the identified receptors.</p>	<p>Contamination of DCWW Cardiff East wastewater treatment plant and subsequent contamination of controlled waters (Severn Estuary).</p> <p>Contamination of surface water - River Taff</p>	<p>Not significant if risk management measures are adhered to</p>
Flooding at the site – loss of raw material, product and potentially polluting substances	Overland flow and via drainage network on site.	Ground and Groundwater  DCWW Cardiff East wastewater treatment plant and subsequently controlled waters (Severn Estuary)  River Taff	<p>All potentially polluting material is stored in impermeable bunded floodproof containers and secured/anchored to the ground.</p> <p>River levels are monitored on a regular basis using the NRW web page for the Upper Boat monitoring station. Weather and weather warnings are monitored on a regular basis via the Met Office Website. PB Gelatins have also signed up to the NRW flood warning alerts.</p> <p>If recorded river levels are 3.5m or above, actions will be taken at the PB Gelatins Installation to prevent flooding. This includes the deployment of flood defenses. The incident will be managed in accordance with the procedures detailed in the Emergency Preparedness and Response Plan until operations can safely recommence.</p>	<p>Low - Moderate</p> <p>Risk management measures should prevent unauthorised releases from reaching the identified receptors</p>	<p>Contamination of DCWW effluent treatment plant and subsequent contamination of controlled waters.</p> <p>Contamination of surface water - River Taff</p>	<p>Not significant if risk management measures are strictly adhered to</p>

**Table 2: Risk Assessment (Cont.)**

Hazard	Pathway(s)	Receptor(s)	Risk Management/Mitigation Measures	Probability of Exposure	Consequence(s)	Overall Risk
Vandalism	Any of the above	Any of the above	<p>The Installation is secured by perimeter fencing and lockable entrances with entry by passcode only.</p> <p>A remote closed-circuit television (“CCTV”) monitoring system surveys all areas of the Installation and can be accessed by senior management at any time. Key members of staff (e.g. Senior Management) are also on call to attend the Installation out of normal working hours of required. The Installation is not unattended at any time.</p> <p>Staff are also encouraged to report unidentified or unknown visitors.</p>	Low. Risk management measures should prevent vandalism.	Any of the above	Not significant if risk management measures are strictly adhered to.

## **6. IMPLEMENTATION OF THE ACCIDENT MANAGEMENT PLAN**

### **6.1. Emergency Response**

- 6.1.1. PB Gelatins will undertake the necessary actions to minimise the environmental consequences of the accident, including, where necessary, taking the appropriate measures to clean up after the accident or incident as outlined in the EMS. The emergency response procedures are detailed in the EPRP (SHE 012) document and must be followed in an emergency.
- 6.1.2. Where relevant, PB Gelatins will aim to get the plant back to normal operation as soon as possible.
- 6.1.3. All relevant personnel at the Installation are made aware of the contingency and control/mitigation measures that are appropriate for dealing with a specific environmental accident. Appropriate training is provided where required; details of any such training provided are recorded in the individual Staff Training Files which form part of the EMS.
- 6.1.4. Specifically related to the emergency response required in relation to a loss of containment, the Major Incidents Response Procedure, found in the major incident crisis management flow chart will be followed. This procedure also forms part of the Installation's EMS.

### **6.2. Roles and Responsibilities**

- 6.2.1. PB Gelatin manages the reporting and investigation of accidents and incidents in compliance with all relevant legislation (including the conditions of the site's Environmental Permit), their EMS and Environmental Policy.
- 6.2.2. The HSE Manager holds the responsibility for ensuring that all such occurrences are recorded and reported to the NRW where applicable.
- 6.2.3. It is the responsibility of all employees to identify and report environmental accidents and near misses as soon as they occur to the HSE Manager.
- 6.2.4. It is the responsibility of all managers to proactively participate in the completion of an incident investigation in relation to their processes, work areas or activities.
- 6.2.5. It is the responsibility of the Plant Manager to communicate investigation outcomes to all relevant site personnel. It is also their responsibility to monitor the effectiveness of the Incident Reporting procedure and highlight any findings at the Management Review Meetings.

### **6.3. Internal Accident Reporting**

- 6.3.1. All accidents, near misses and abnormal events that occur at the Installation are documented within a Major Incident Report ("MIR"). Information regarding the accident must be collated including witness statements as soon as possible.
- 6.3.2. The Environmental Risk Assessment relating to the process/work area/work tasks associated with the accident/incident must be reviewed.

### **6.4. External Incident Reporting**

- 6.4.1. PB Gelatins has made all key personnel aware of the procedures for contacting the relevant emergency services and external bodies in the event of an incident or occurrence that could have an impact on the environment or the surrounding receptors. Relevant contact numbers are contained within Appendix 3 of the EPRP, Section 7 of the AMP and within the relevant sections of management plans.
- 6.4.2. NRW will be informed of any such incidents or occurrences that impact the environment or sensitive receptors.
- 6.4.3. In the event of an accident or incident arising that could pose a risk to the environment or human health, PB Gelatin will immediately take the actions detailed in the following documents:
- the EPRP, and the JESIP Principles therein.
  - this AMP; and
  - their EMS.
- 6.4.4. The HSE Manager will be responsible for co-ordinating the emergency response and fill out the M/ETHANE form as stated within the EPRP.

### **6.5. Accident Investigation**

- 6.5.1. Following an environmental accident, PB Gelatins will undertake an investigation to:
- ascertain the root cause of the accident;
  - consider if the response and actions taken were adequate;
  - if necessary, put in place measures to prevent reoccurrence; and
  - If necessary, review and amend the EPRP and AMP to reflect any changes that have been implemented.
- 6.5.2. The HSE Manager will be responsible for initiating and undertaking the investigation and implementing any resultant remedial measures that may be required.
- 6.5.3. The AMP will be reviewed following any significant environmental accident or incident and if the investigation identifies areas for improvement or the requirement for additional measures, the AMP will be updated accordingly. The updated AMP will be sent to NRW for approval following any significant alterations.



## **6.6. Follow up Procedures.**

- 6.6.1. The actions agreed on the MI procedure are to be undertaken by the relevant person. At the end of each calendar month, the HSE Manager will check the progress of each action with the individuals concerned.
- 6.6.2. The Office Representative will maintain records of accident/incidents for a minimum of three years for future reference.
- 6.6.3. At the end of each year, the HSE Manager will send a summary of the actions undertaken in response to any accidents / incidents, together with any outstanding work that may be required, to the Management Team.
- 6.6.4. If there are any areas where improvements are required, these shall be implemented as soon as is practicable. All improvements and deadlines will be discussed with the NRW to ensure that appropriate timescales can be set.

## 7. LIST OF KEY CONTACTS

### 7.1. Contact Details

- 7.1.1. The key contacts provided in Table 3 should be used in the unlikely event of an incident or accident, such as those detailed in this AMP, occurring at the Installation.

**Table 5: Key Contact Details**

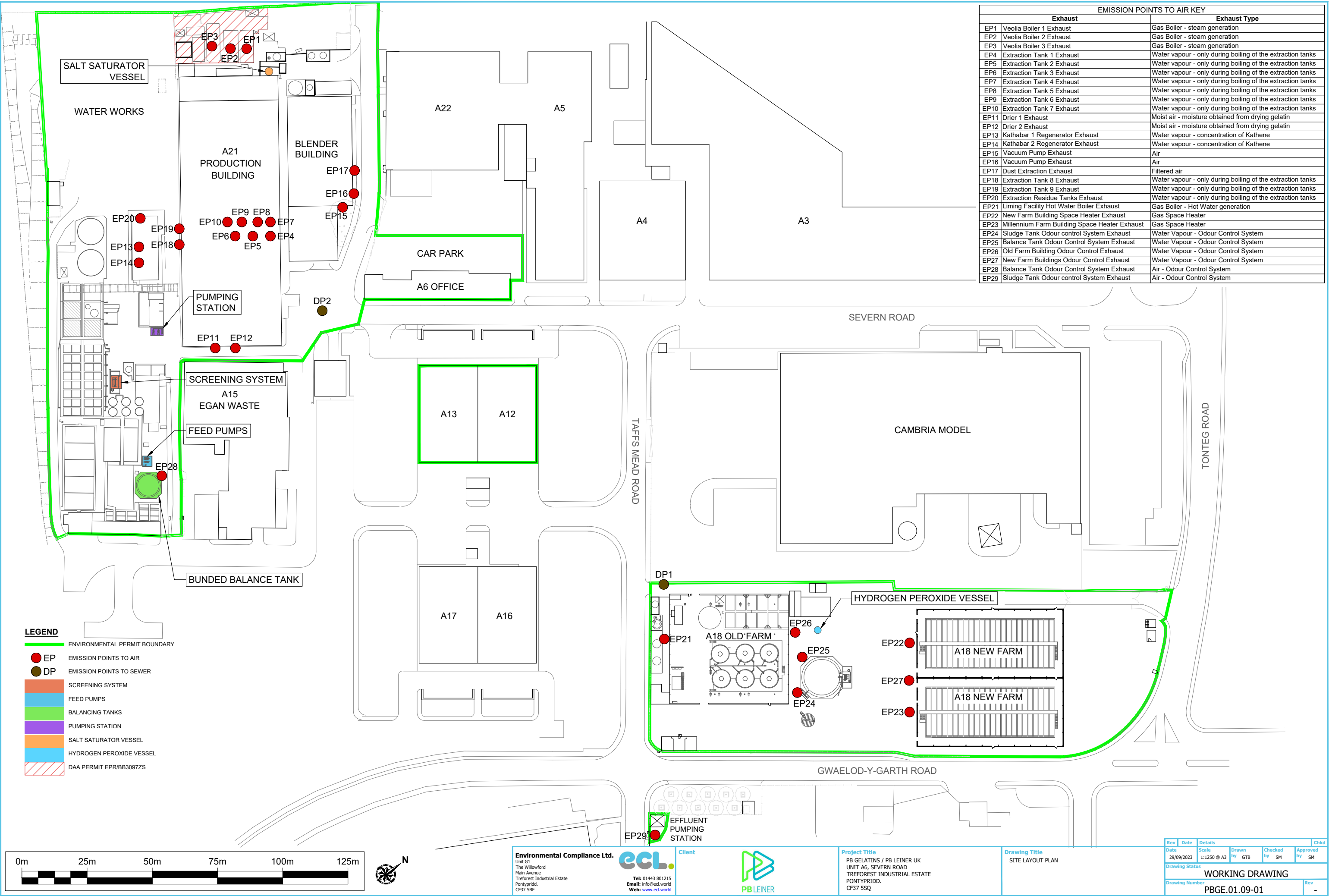
Operator	PB Gelatins (UK) Limited		
Environmental Permit Reference	EPR/DP3030ZC		
Site Address	UNIT A6, SEVERN ROAD, TREForest INDUSTRIAL ESTATE, PONTYPRIDD, CF37 5SQ		
Name	Description	Contact Details (Office Hours)	Contact Details (Out of Hours)
Internal			
Mauricio Caetano-Ramos	Plant Director	07503 730468	
Benjamin Davies	Production Manager	01443 849300	07572 875972
Neil Davies	Engineering Manager	07980132466	
Matthew Kazemi	HSE Manager	01443 849300	07870513043
External – Emergency Services			
Fire and Rescue Service Oxford St, Treforest, Pontypridd CF37 1RU	Non-Emergency	01443 232000	-
	Emergency	999	
Royal Glamorgan Hospital, Ynysmaerdy, Llantrisant CF72 8XR	Non-Emergency	01443 443443	-
	Emergency Only	999	
Police – South Wales Police	Non-Emergency	101	
	Emergency Only	999	
External - Regulators			
Natural Resources Wales	Incident Hotline	03000 65 3000	
Rhondda Cynon Taf Council, Sardis Rd, Pontypridd CF37 1DU	Local Council Emergency Contact Number – Pollution to the Environment	01443 425001	
External – Key Services			
Dwr Cymru/Welsh Water	24 Hour Emergency Contact Water Supplier and Wastewater Treatment	0800 0520130	
Western Power Distribution	Energy Supplier	105	
Environmental Compliance Ltd	Specialist Environmental Advisors	01443 801215	-

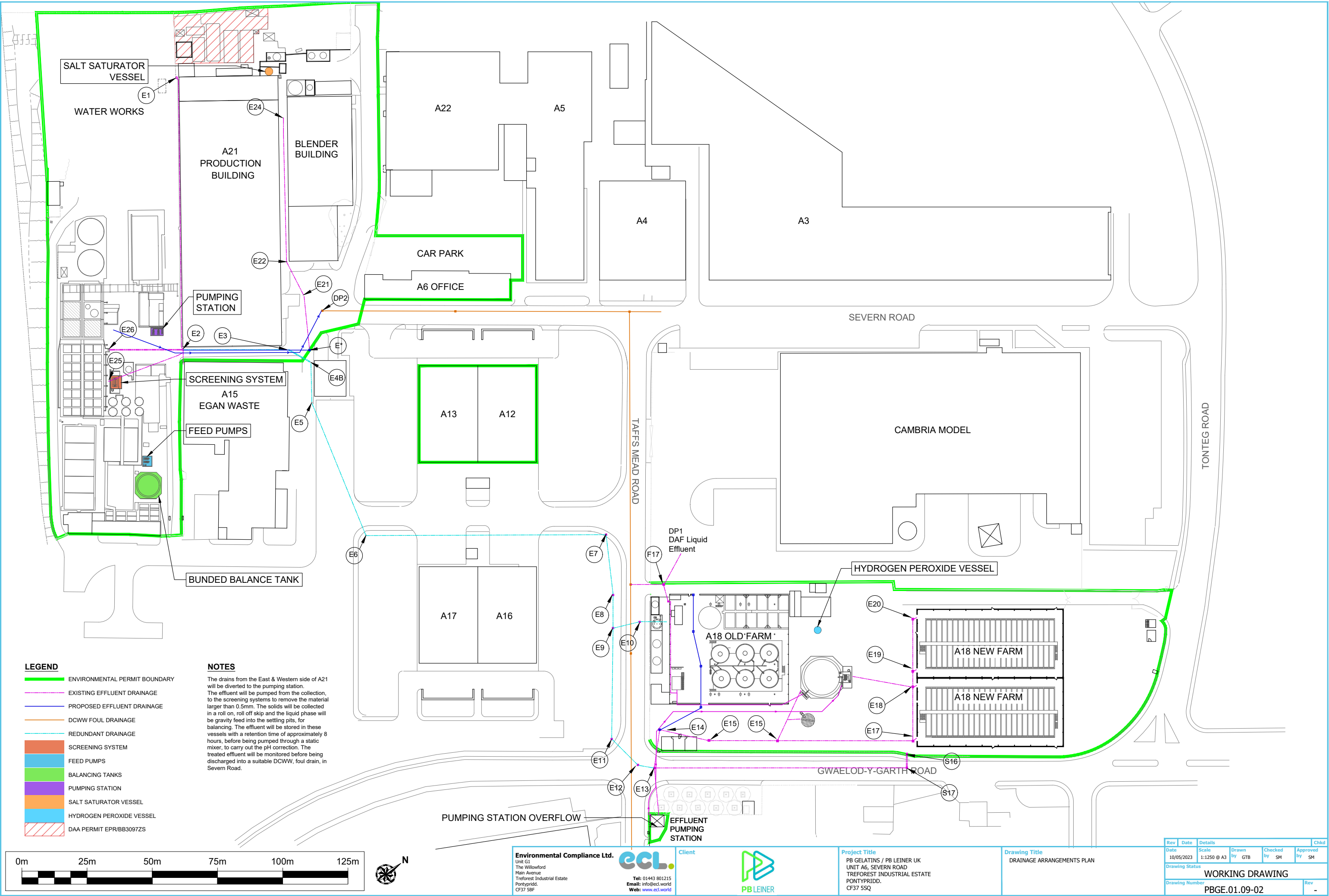
## **7.2. Public Notice Board**

7.2.1. A notice board at the site entrance is present to inform the public about the site. The notice board includes:

- the permit holder's name – PB Gelatins (UK) Limited.
- an emergency contact telephone number 01443 849300;
- a statement that the site is permitted by NRW and the EP number – EPR/DP3030ZC; and
- NRW telephone and incident hotline (0300 65 3000).

## **APPENDIX I SITE LAYOUT PLAN**

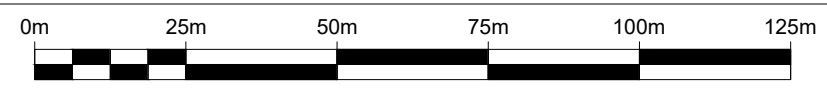




- LEGEND**
- ENVIRONMENTAL PERMIT BOUNDARY
  - EXISTING EFFLUENT DRAINAGE
  - PROPOSED EFFLUENT DRAINAGE
  - DCWW FOUL DRAINAGE
  - REDUNDANT DRAINAGE
  - SCREENING SYSTEM
  - FEED PUMPS
  - BALANCING TANKS
  - PUMPING STATION
  - SALT SATURATOR VESSEL
  - HYDROGEN PEROXIDE VESSEL
  - DAA PERMIT EPR/BB3097ZS

**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.**  
Unit G1  
The Willowford  
Main Avenue  
Treforest Industrial Estate  
Pontypridd,  
CF37 5BF

**ecl**  
Tel: 01443 801215  
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**  
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