

Compliance Assessment Report CAR_NRW0046437

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: 31/12/2024.

Parts of permit assessed: 3.5.1, 4.2.1, 4.2.2, 4.2.3.

NRW Lead Officer: Dale Padfield.

Report sent to: -, Contract Manager - Industrial, Water & Energy (IWE) South Region, on 11/03/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	C4 No impact	4.2.2
IR1A - Installations - Management - General Management	C4 No impact	1.1.1
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
2	0.2

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 reports are submitted by the required deadlines.	Already completed

Criteria	Action needed	Complete by
IR1A	Ensure procedures are in place to capture reporting deadlines and ensure staff are familiar with the procedures and permit requirements.	Already completed
IR3A(3)	Please provide NRW with an update with regards to the on-going sampling in relation to the MNA.	31/03/2025

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 form details the following:

- Annual reporting returns for 2024.
- Update to actions from CAR_NRW0045224
- Site updates

Annual reporting returns – 2024

The returns were received on the 03/02/2025, beyond the permitted reporting window (31st January). As there were no non-compliances within the reported information, the following minor category 4 non-compliance is issued, in-line with non-compliance scoring.

Non-compliance: Category 4 minor non-compliance for failing to report by the required deadline. Permit condition 4.2.2.

As with any non-compliance the root cause also need to be identified and scored on it's own merits. A late report is often a symptom of a poor management system, whereby procedures are not in place to ensure reports are submitted within the correct timeframe, or a failure to follow such procedures.

**** A category 3 non-compliance score was initially applied for this non-compliance, however, further information provided by Veolia showed the report was ready by the deadline but an admin error**

resulted in the report being submitted the next working day. As such, the non-compliance score has been downgraded to a category 4.

Non-compliance: Category 4 minor non-compliance for the EMS failing to prevent late reporting. Permit condition 1.1.1.

Emissions to air

All emissions below MCPD requirements. Reports accepted.

Performance reporting

Steam metering is now in effect with a meter capturing total steam output in place since January 2024, this is a welcomed improvement. Trends in efficiency cannot be reliably made due to the lack of accurate data for previous years.

Figures reported for energy, and water usage are as expected for the installation, with fluctuations likely a result of demand from PB.

As with previous years, a trailer boiler was brought on to site to facilitate repair and maintenance works. A gas mains connection resulted in the boiler utilising grid gas opposed to gas-oil.

Thermal efficiency of the plant was reported at 88.32%, which is expected for the age and type of plant.

The plant relied on natural gas primarily, with gas oil only being used as a means to empty the storage tanks to facilitate their decommissioning.

Reports accepted.

Actions from CAR_NRW0045224

One action remained from the above CAR:

“Provide an update on the requests made by NRWS Geoscience team in the email dated 05/06/2024 - in relation the programme of monitored natural attenuation.”

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A response was received on 30th September 2024, detailing Veolias intentions to conduct further ground water sampling and submit an addendum to the MNA report. Please provide NRW with an update.

Other site updates

As you're aware, PB Gelatins have announced closure of the plant and a likely surrender of the permit.

As the Veolia permit is a DAA for the PB installation, it is assumed that Veolia are likely to be surrendering their permit also, please provide NRW with an update on Veolia's intentions. A site visit can be arranged if Veolia would like to discuss any aspects of the permit surrender.

End.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

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

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry compliance criteria (used in section 1 and 2):

1. Management

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

2. Operations

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

3. Emission and Monitoring

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

4. Information

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

Enforcement response

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.