

Compliance Assessment Report CAR_NRW0046778

Permit being assessed: DP3030ZC.

For: PB Gelatins EPR/DP3030ZC, **held by:** PB Gelatins UK Limited

At: Unit A6 Severn Road , Treforest Industrial Estate, Pontypridd, Rhondda Cynon Taf, CF37 5SQ.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 07/03/2025 between 10:30 and 12:00.

Parts of permit assessed: 3.1.2,1.1.

NRW Lead Officer: Dale Padfield.

Report sent to: -, Plant Director , on 28/03/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.1
IR1A - Installations - Management - General Management	C3 Minor	1.1
IR4C - Installations - Information - Notification	Assessed (A)	
IR1A - Installations - Management - General Management	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	8

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
IR3B	Ensure process effluent is treated via the DAF plant prior to	Already

Criteria	Action needed	Complete by
	discharge to DCWW foul sewer.	completed
IR1A	Ensure procedures detail adequate functionality checks on effluent treatment plant.	Already completed
IR1A	PB Gelatins to produce a decommissioning plan to detail the steps that will be taken to ensure the site will be left in an acceptable state with no evidence of deterioration since baseline, which poses no risk to the environment, and to demonstrate that any risk to environment during the decommissioning will be controlled and mitigated. Please provide NRW with a copy of the plan once completed.	31/05/2025

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

PB Gelatins UK Ltd

EPR/DP3030ZC

This compliance assessment report (Car) details the following:

- Foaming incident on the 09/01/2025
- Site visit on the 07/03/2025 to discuss closure timelines and permit surrender

Foaming incident on the 09/01/2025

On the 09/01/2025 NRW's Incident Communications Centre (ICC) revived a report of foam surcharging from 3 manholes located on Taff Mead Road (Treforest). The report was made by PB Gelatins (PBG). Dwr Cymru Welsh Water (DCWW) attended following a POLFAX notification. PBG reported that the area had been cleaned with all foam and residue removed, with rock salt applied to the road to prevent freezing & slip hazards.

Further investigation by PBG revealed that at some point following start up of the plant on the 2nd of January, the A18 effluent plant had suffered a fault. This fault resulted in the plant being by-passed with untreated effluent discharging directly to DCWW foul sewer.

The foam surcharging from the foul drains had the potential to enter storm drainage and discharge to

the river Taff, which could have resulted in minor or minimal environmental impact. Additionally, an unknown quantity of un-treated effluent had been discharging to the foul sewer, which was suspected to have been occurring for several days, which is also in breach of the operating conditions.

The following minor non-compliance will be issued for the un-authorized emission of a potentially polluting substance.

Non-compliance: A category 3 minor non-compliance is issued for the fugitive emission of potentially polluting substance. Permit Condition 3.2.1

The fault on the A18 plant was identified as a failure with the system that controls the valves, which allow PBG to discharge directly to DCWW with the pumping station – bypassing the DAF plant. The root-cause is seen as deficiencies within the environment management system (EMS), specifically, procedures for routine functional checks of the A18 effluent plant system and DAF plant. The following non-compliance will be issued against the management system, as the root cause of the incident.

Non-compliance: A category 3 minor non-compliance is issued for the management system failing to minimise the risk of pollution. Permit Condition 1.1.1.

PBG had self-reported the incident, in-line with the permit requirements.

PBG have now resolved the issue and have a system in place to prevent a re-occurrence, no further action required.

Site visit – 07/03/2025

The overall purpose of the site visit was to discuss PBG's expected closure timelines and to provide some oversight of NRW's expectations and processes for the permit surrender.

PBG now have an expected timeline for plant closure and decommissioning, however some uncertainty remains with exact timelines as the site were still awaiting some direction from the parent company.

As discussed during the visit, both the EPR and abstraction permits will require surrender. The abstraction permit is a relatively straight forward surrender, mainly requiring notification via a form which can be found on NRW's website. Following surrender of this permit, an inspection of the abstraction point will be made to ensure the abstraction equipment has been removed.

The EPR permit surrender process is slightly more onerous, in which the site will need to apply for the surrender and meet various requirements to ensure the 'site' is returned to an acceptable state (no deterioration since baseline). Additionally, all environmental risks will need to be removed, such as hazardous inventory and all wastes. PBG will be required to produce a decommissioning plan to demonstrate how they intend on meeting this requirement. The plan should set out the steps that will be taken to ensure the site will be left in an acceptable state which poses no risk to the environment. PBG will also need to demonstrate that any risk to environment during the decommissioning will be controlled and mitigated, such as through the safe removal and disposal of wastes etc. Ideally, a

decommissioning plan should have already formed part of the EMS, however, it appears this aspect has not been covered. As such, the following action will be issued.

Action: PB Gelatins to produce a decommissioning plan to detail the steps that will be taken to ensure the site will be left in an acceptable state with no evidence of deterioration since baseline, which poses no risk to the environment, and to demonstrate that any risk to environment during the decommissioning will be controlled and mitigated. **Due 31/05/2025**

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.