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

SUPPORTING INFORMATION DOCUMENT

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

ECL Ref: PBGE.01.14/SID
February 2026
Version: Issue 1

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APPENDICES

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LIST OF FIGURES

ACRONYMS/TERMS USED IN THE TEXT

CAR	**Compliance Assessment Report**
DAA	**Directly Associated Activities**
DAF	**Dissolved Air Floatation**
DCWW	**Dwr Cymru Welsh Water**
ECL	**Environmental Compliance Limited**
EP Regulations	**Environmental Permitting (England and Wales) Regulations 2016**
NGR	**National Grid Reference**
NRW	**Natural Resources Wales**
PB Gelatins	**P B Gelatins U.K. Limited**
SCP	**Site Closure Plan**
SID	**Supporting Information Document**
SSAR	**Site Surender Application Report**
The Installation	**P B Gelatins U.K. Limited Gelatin Manufacturing Site**

1. INTRODUCTION

1.1. Surrender Application Summary

1.1.1. Environmental Compliance Limited ("ECL") has been commissioned by P B Gelatins U.K. Limited ("PB Gelatins") to prepare an Environmental Permit (EPR/DP3030ZC) surrender application following cessation of the permitted activities in October 2025 at their gelatin manufacturing site, hereafter referred to as "the Installation" located on Unit A6, Severn Road, Treforest Industrial Estate, Pontypridd, CF37 5SQ.

1.1.2. This Supporting Information Document ("SID") has been prepared as part of the surrender application. It summarises the main elements of the application and provides further detailed information regarding the decommissioning activities which have been undertaken.

1.1.3. The aim of the application is to describe the condition of the land at the Installation to demonstrate that decommissioning activities have been undertaken in an environmentally responsible manner, all pollution risks have been removed and the land is in a satisfactory condition as demonstrated by land and groundwater reference data.

1.2. Surrender Application Documents

1.2.1. This surrender application consists of a number of reports, some of which have been previously submitted to Natural Resources Wales ("NRW"), however, for ease of reference, they have been resubmitted as part of this application.

1.2.2. The main document which forms this application is the Site Surrender Application Report ("SSAR") (Document Reference NS_0118_32, Issue 1.1., Dated January 2026) which is submitted in Section 2 of this application.

1.2.3. The SSAR references the following documents which should be read in conjunction with the SSAR and which are contained in Section 4 of this application:

- PB Gelatins UK, Application Site Condition Report Site Condition Report – March 2013 - Integral Geotechnique (Wales) Limited. Report Reference: 11121/CS/13/SCR;
- PB Leiner, Site Condition Report - January 2020 - Integral Geotechnique (Wales) Limited. Report Reference: 12588/CS/19/SCR;
- PB Gelatins UK Limited, Site Condition Report, - December 2023 – ECL. Report Reference: PBGE.01.09/SCR;
- Geo-Environmental Ground Investigation Assessment at PB Leiners (PB Gelatins) '(A18)' – December 2020 - ECL. Report Reference: ECL.109.01.01/GIR;
- Geo-Environmental Ground Investigation Assessment at PB Leiners (PB Gelatins) – August 2020 – ECL. Report Reference ECL.095.01.01/GIR;
- Geo-Environmental Ground Investigation Assessment at PB Leiners (PB Gelatins) – February 2023 – ECL. Report Reference: VEOL.01.02/GIR;
- PB Leiner UK, Liquid Sodium Hydroxide Spill – Monitored Natural Attenuation - March 2024 - NSugg Ltd. Report Reference: NS_0118_21/MNA;

- PB Leiner UK, Liquid Sodium Hydroxide Spill – Monitored Natural Attenuation Addendum Report - April 2025 – Nsugg Limited. Document Reference NS_0118_21/MNA/ Addendum);
- Site Investigation Report, PB Leiners (PB Gelatins) – November 2022, ECL. Document Reference PBGE.01.06/SCR, also reported in the 2023 SCR;
- Site Closure Plan, Environmental Permit EPR/DP3030ZC, PB Gelatins UK Limited, June 2025 – ECL. Document Reference PBGE.01.14/SCP.

2. SITE DETAILS

2.1. The Applicant

2.1.1. The applicant is PB Gelatins UK Limited. The company number is 01477674. The Installation address is Unit A6, Severn Road, Treforest Industrial Estate, Pontypridd, CF37 5SQ.

2.1.2. The site manufactured high purity gelatin for use within various industries, including food, photographic and pharmaceutical applications.

2.1.3. The main raw material input to the Installation consisted 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 acidic solutions, before being transported to the 'production and blender building' for further physical and chemical processing to complete the gelatin production.

2.2. Site Location

2.2.1. The Installation is located at the northern end of Treforest Industrial Estate, in an extensive area of generally light industrial and commercial developments. The Installation occupies an approximate area of 3.85ha and the main reception building is centred on National Grid Reference ("NGR") 310198, 186871.

2.2.2. The Installation is arranged as a number of discrete areas within the Treforest Industrial Estate. The drawing showing the Permit boundary reproduced from Schedule 7 of the Environmental Permit is provided in Appendix I.

2.2.3. PB Gelatins undertook significant improvements to the drainage arrangements and Effluent Treatment Plant in 2024 following discussion with NRW (detailed in CAR_NRW0043849, dated 04/04/2024). These changes were to be captured as part of a Permit variation. As a business decision was made to cease site activities, the Permit variation application was not pursued. However, for the purpose of this surrender application, the current state of the Installation will be discussed and therefore, drawing showing the Site Layout Plan (PBGE.01.09-01) contained in Appendix I should be used as reference to the site layout of the Effluent Treatment Plant.

2.2.4. Additionally, the drawing shows the expanded Environmental Permit boundary which as part of the Permit variation application was to include Buildings A12 and A13. These areas were solely used for internal storage on impermeable surfacing isolated from the drainage network and therefore, are not deemed to have posed significant environmental risk. The drawings submitted therefore, show this additional area but it is not currently part of the Environmental Permit.

3. PERMITTED ACTIVITIES

3.1. Permitted Activities

3.1.1. The currently permitted Schedule 1 Activity under the Environmental Permitting (England and Wales) Regulations 2016 as amended ("EP Regulations") is detailed in Table 1.

Table 1: Schedule 1 Activities

Schedule 1 Activity	Description of Specified Activity	Limits of Specified Activity
S6.8 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.
S5.4 A (1) (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.

3.1.2. The Directly Associated Activities ("DAA") currently permitted are detailed in Table 2.

Table 2: Directly Associated Activities

Description of DAA	Limits of Specified Activity
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.
Storage of finished products	From receipt of finished products to despatch of products.
Raw materials storage and handling	From receipt of raw materials to transfer to the manufacturing process.
Chemical storage and handling	From receipt of materials to their use on-site or disposal off-site.

4. CHANGES TO THE ACTIVITY

4.1. Environmental Permit Boundary

4.1.1. As discussed, prior to ceasing operations, PB Gelatins were in the process of proposing the expansion of their existing EP boundary to incorporate additional storage areas in Building A12 and A13 for 'work in progress' material/intermediate product prior to blending, as well as storage of finished product prior to dispatch from the Installation.

4.1.2. The updated Site Layout Plan (PBGE.01.09-01) showing the proposed expanded EP boundary is provided in Appendix I.

4.1.3. As the Permit variation application was returned due to site activities ceasing, the additional area is not currently part of the Environmental Permit.

4.2. Changes to Permitted Activities

4.2.1. As part of the variation, there were no change to the Schedule 1 Activities included in Table 1 or the DAAs included in Table 2 as a result of this variation application.

4.2.2. The Permit variation was to propose the following to ensure the Permit was reflective of onsite activities:

- new effluent treatment plant associated with building A21 operations, altered site drainage and one additional point source emission to sewer designated DP2;
- expansion of the Environmental Permit boundary for the inclusion of additional storage areas within Buildings A12 and A13;
- installation of two new biofilters – one to service the 'A18 New and Millennium Farm' Buildings and a second unit for the A18 'Old Farm' building – *please note these were not installed*;
- incorporation of ten additional point source emissions to air designated EP20-EP29 *– please note only 7 of the 10 point source emissions were present (all of which were existing and to be captured as part of the variation. The two new proposed emission points related to the biofilters which were not installed)*;
- installation of a new bunded 15m^3 hydrogen peroxide tank and a 30m^3 salt saturator (brine) vessel adjacent to the A21 building.

4.2.3. Following the June 2022 effluent spill, the proposed variation included installation of a new effluent treatment plant to serve building A21 and also altered drainage arrangements at the Installation following assessment of the continued suitability of the effluent subsurface drainage system as required by the Compliance Assessment Report ("CAR") (CAR_NRW0040197).

4.2.4. The new effluent treatment included effluent settlement and pH correction and the drainage network connecting the two discrete areas of the Installation (buildings A21 and A18) being made redundant. As a result of this change, an additional discharge point to sewer, designated DP2, was proposed. This discharge was to be authorised by a new Dwr Cymru Welsh Water ("DCWW") Trade Effluent Consent. The existing point source emission

to sewer, designated as DP1, remains and the existing Trade Effluent Consent was to be varied to reflect the proposed changes.

4.2.5. PB Gelatins proposed to operate the new effluent treatment plant in advance of the Permit variation due to the immediate need to improve the effluent treatment and drainage arrangements at the Installation and taking into consideration the significant permitting delays. NRW assessed the proposal and the Site Inspector via email on the 9th February 2024 stated that *"operation of the new ETP prior to permit variation is likely to pose low risk to the environment, people or property. Furthermore, the new ETP is likely to result in reduced risk when compared the current system in place. Based on this assessment, NRW are willing to accept that PB Gelatins will be in breach of their permit while the application undergoes determination and will accept that PB Gelatins will commission and operate the new ETP before the permit variation has been granted. With the provision that all control and operational measures identified within the application are implemented."*

5. NRW PRE-APPLICATION ADVICE

5.1. NRW Meeting – March 2025

5.1.1. A meeting was held between PB Gelatins and NRW to discuss the surrender of the Environmental Permit due to the site closure. NRW Site Inspector Dale Padfield was in attendance, along with PB Gelatins' Managing Director, Engineering Manager and Reliability Manager.

5.1.2. The relevant guidance for the application was discussed, namely Regulatory Guidance Note RGN 9: Surrender (May 2013, Version 3). It was discussed that a low-risk surrender was unlikely and therefore, a full surrender required a detail report using monitoring data was required. As such, the Surrender Site Condition Report Document Reference NS_0118_32, Issue 1.1., Dated January 2026) is provided in Section 2 of this application.

5.1.3. It was also confirmed by NRW during the meeting that there were no outstanding CAR actions outstanding.

5.1.4. A copy of the meeting minutes prepared by PB Gelatins is provided in Appendix II.

6. DECOMMISSIONING ACTIVITIES

6.1. Application of the Waste Hierarchy

6.1.1. A Site Closure Plan ("SCP") (PBGE.01.14/SCP Issue 2) was prepared and submitted to NRW in July 2025 which describes how the Installation can be decommissioned safely. A copy of the SCP is provided in Section 4 of this application.

6.1.2. The SCP was followed as demonstrated within the SSAR.

6.1.3. When establishing the decommissioning strategy, consideration of the waste hierarchy (prevention, preparing for re-use, recycling, other recovery and disposal) was paramount.

6.1.4. The following describes the application of the waste hierarchy during decommissioning:

- **prevention** – during scaling back and ultimately shutdown of the gelatin manufacture, stock levels were carefully controlled to ensure that quantities of chemicals and raw materials gradually declined to prevent the need for disposal in large quantities and also resulted in less packaging also needing to be removed from site;
- **Preparing for Re-use** –
  - discussions were held with other PB Gelatin sites across the world to see if equipment could be relocated and reused. In doing so, numerous large plant and equipment was relocated, for example, the DAF unit, the screw press, extraction residue system, cooling towers and bio-filters were sent for re-use at other sites;
  - all gelatin process equipment and blending equipment has been sold for reuse at a new processing facility in Egypt;
  - the A21 effluent treatment balance tank and bulk chemical storage tanks and valves were also sold for re-use via online auction;
  - numerous chemicals in both liquid and powder form which were for use in water preparation, waste water treatment and pH correction in the liming facility were given to Aquatreat Environmental Products Limited (water and effluent treatment specialists) for reuse.
- **Recycle and Other Recovery** – several items were purchased for recovery, such as stainless steel, carbon steel and copper. Items such as the de-limer, screening system within A21 effluent treatment plant, steam boilers and various sections of pipework for the purpose of recovering the metal;
- **Disposal** – the majority of waste disposed has been associated with the cleaning work carried out in the water treatment works area, effluent treatment plant and gelatin manufacture where no other outlet could be identified. The waste was disposed of by appropriately licenced contractors taken to permitted sites. For example, the emptied tanks in the water works and silt sludges were collected and disposed of at Tradebe Gwent Limited located at the Gwent Waste Management Centre on Corporation Road, Newport (Permit Ref: EPR/SP3531SK) for further treatment and disposal. Other items, such as the ultra-filter membranes, cellulose filter pads and ion exchange resins were disposed of as there were no other routes available.

6.2. Removal of Pollution Risk

6.2.1. General equipment and plant has been cleaned, and where necessary, drained of potentially contaminating fluids before removal using specialist contractors.

6.2.2. All waste has been removed in accordance with Duty of Care obligations. Suitable waste contractors have been employed and waste paperwork maintained.

6.2.3. Settling pits and reservoirs have been emptied and cleaned and silt disposed of.

6.2.4. Decommissioning of chiller unit was undertaken in September 2025 ready for shipping to USA. Recovered 24.5kg combined total into bottle no. SCO17058. A Waste Transfer Note was completed and bottle collected.

6.2.5. Safe disposal of chemicals in the bulk and intermediate chemical storage vessels has been undertaken by a suitable competent contractor.

6.2.6. A site audit was undertaken which involved identification of all bulk chemical storage vessels and inspection.

6.2.7. 'The Request for Quotation for Decommissioning a Process Site' details the equipment and process vessels which were to be emptied and cleaned. This document details each item of equipment/vessel, the size, quantity, contents and a corresponding photograph. This is included in Appendix A of the SSAR.

6.2.8. The decommissioning emptying and cleaning tasks are detailed in the Excel spreadsheet titled 'Decommissioning Tasks' which is contained in Appendix III. The Installation area, sub area, a description of task, as well as a breakdown of all site chemicals and dates of removal of material and tank and pipework flushing is provided.

6.2.9. Copies of each 'Tanker Rinse Out Record' have been maintained which detail the rinse out and confirm when solid and liquid residues are no longer visible and water run-off is clear. The record also confirms the rinse out is complete and it is in a clean and safe condition. Waste Transfer Notes for each washings waste liquid are completed and held.

6.2.10. Photographs were also taken as evidence before and after emptying and cleaning of the flocculators, settling pits and reservoirs. These can be made available to NRW on request.

7. PHOTOGRAPHS SHOWING DECOMMISSIONING

7.1. Overview

7.1.1. Photographas have been taken by PB Gelatins of the main site areas to illustrate the decommissioning activities which have been undertaken.

7.2. A18

7.2.1. Figures 1-6 show areas of A18 – New and Millenium Farm Buildings.

Figure 1 – Millenium Farm Blower Area

Figure 2: Millenium Farm Compressor Area

Figure 3: Millenium Farm – North Side

Figure 4: New Farm Blower Area

Figure 5: New Farm Compressor Area

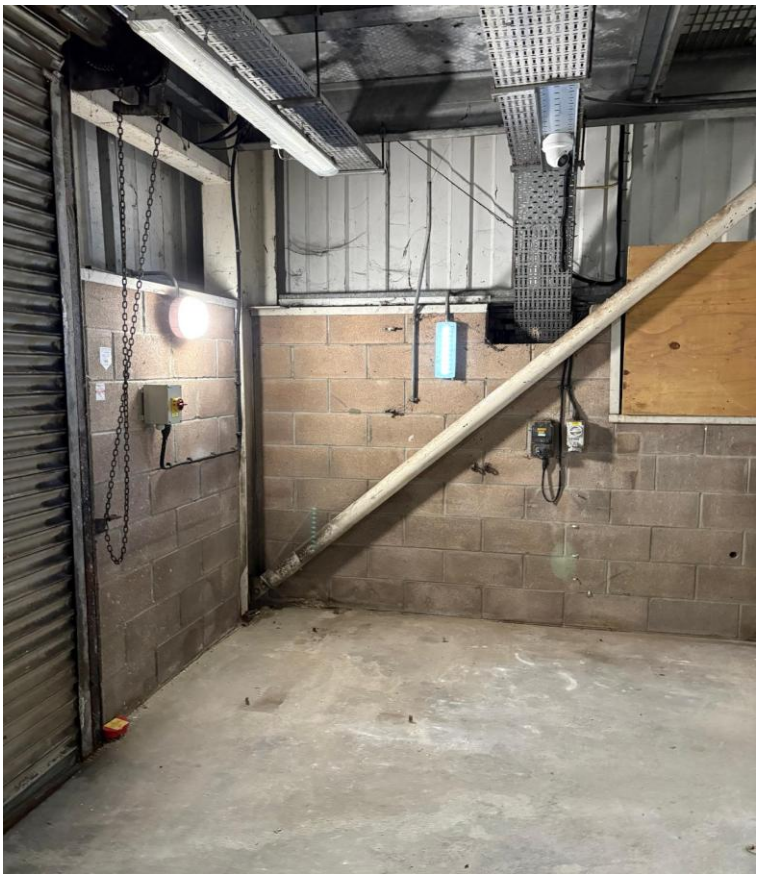


Figure 6: New Farm – North Side

7.2.2. Figures 7-10 show areas of A18 – Old Farm Building Areas and Effluent Treatment Plant.

Figure 7: Removed Water Tank

Figure 8:De-Limer Area

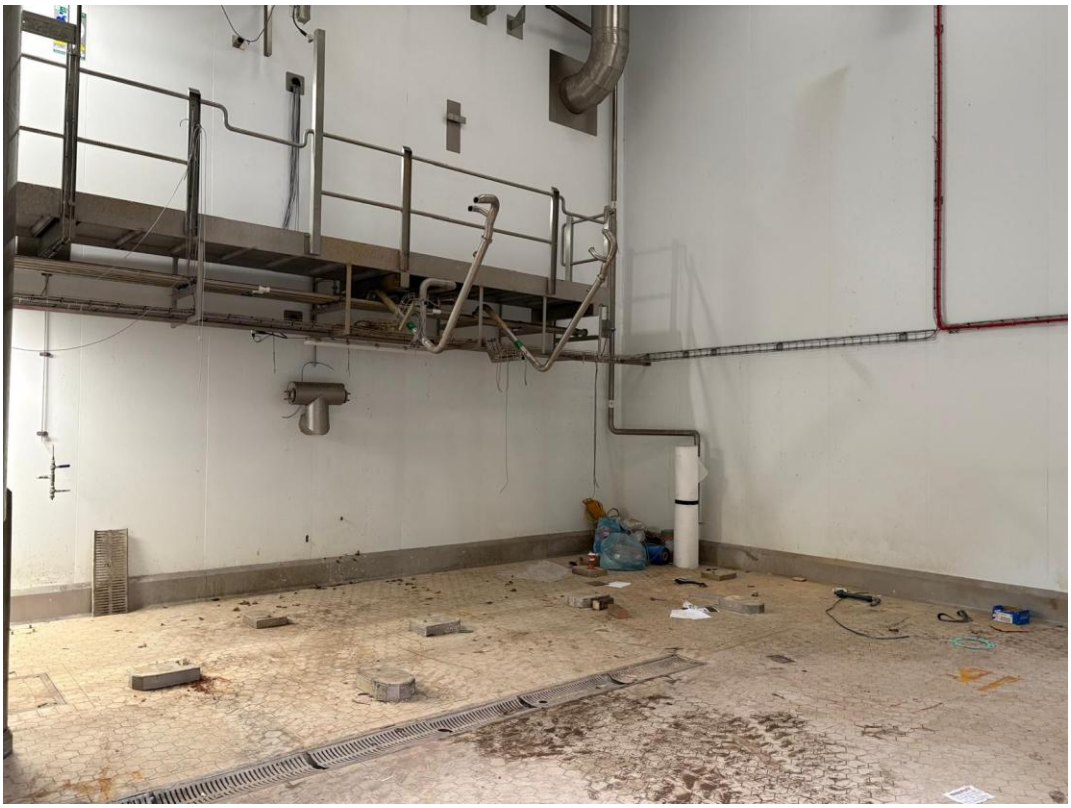
Figure 9: A18 Effluent Plant – DAF Area

Figure 10: Rotary Screen Building Removed

7.2.3. Figures 11-12 show areas of A21.

Figure 11: Screw Press Removed

Figure 12: Extraction Residue System Removed



7.2.4. Figures 13-15 show areas of the Blending Plant.

Figure 13: Blending Plant – Ground Floor

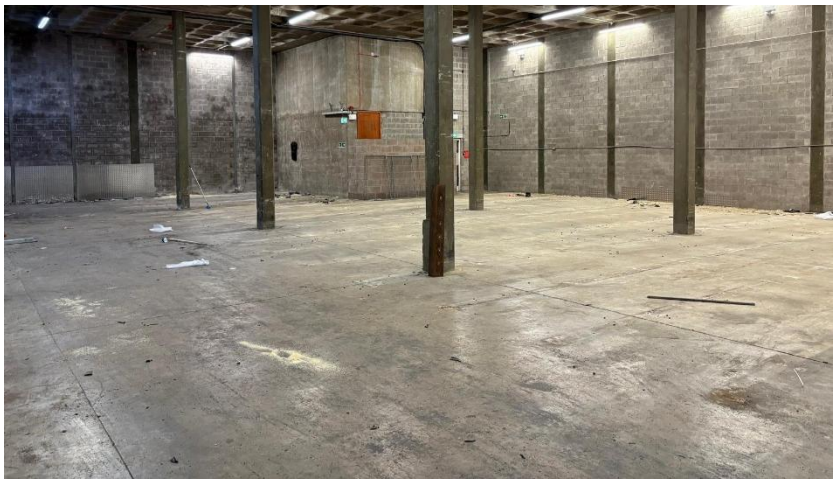


Figure 14: Blending Plant – Middle Floor

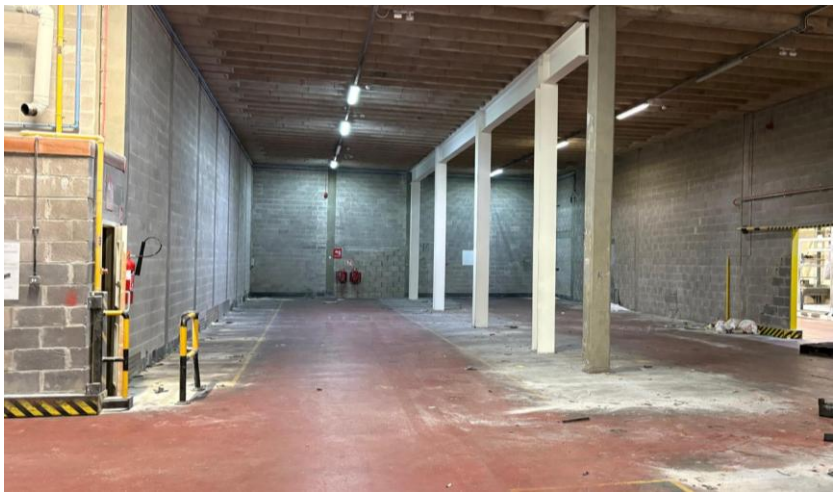
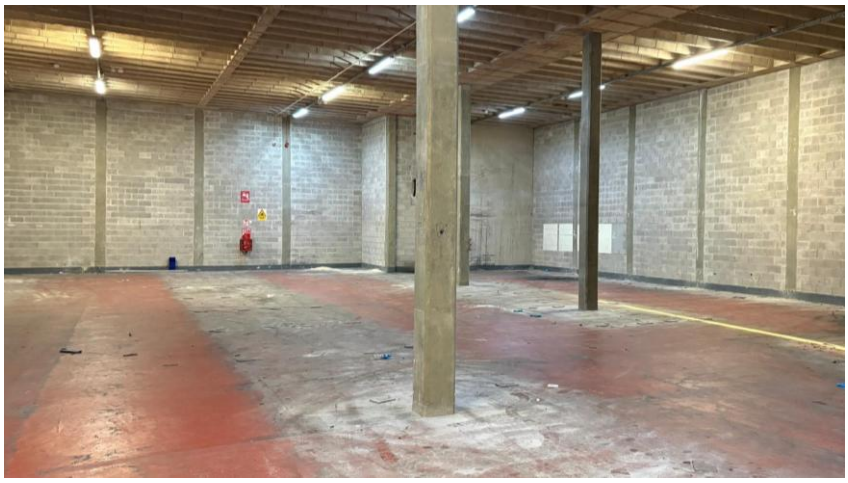


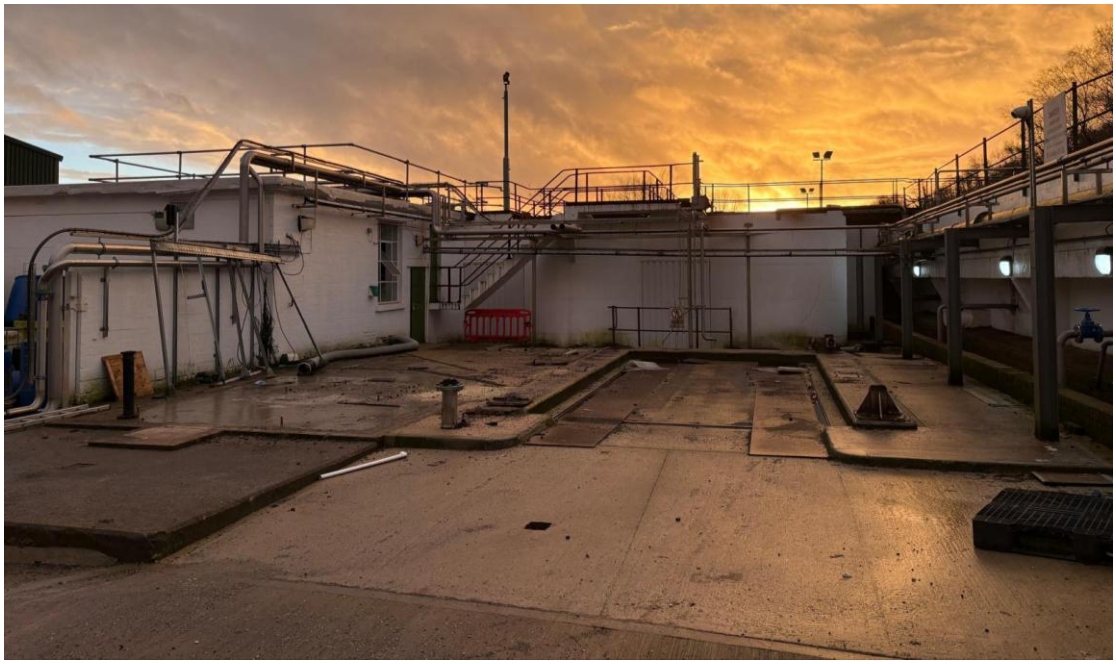
Figure 15: Blending Plant – Top Floor



7.2.5. Figures 16-17 show areas of the A21 Effluent Treatment Plant.

Figure 16: A21 Balance Tank Removed

Figure 17: A21 Effluent Screen and TAC40 Removed

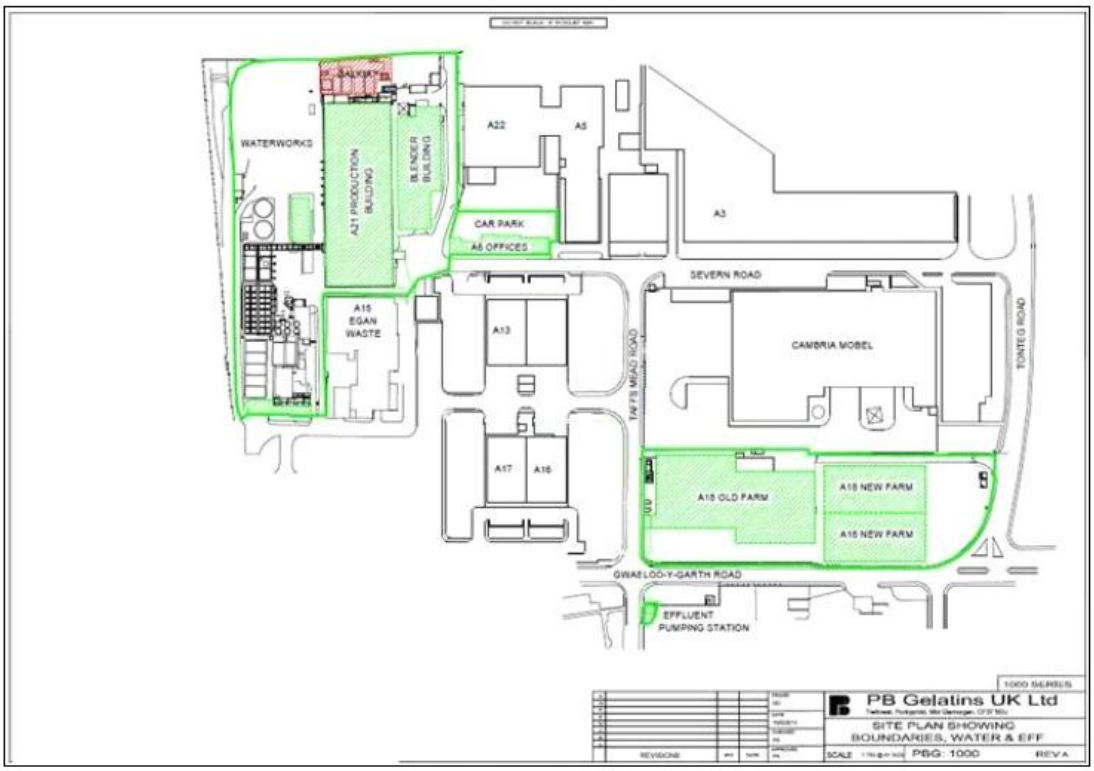


8. CONCLUSION

8.1. As demonstrated within the SSAR and this SID, pollution risks have been removed, the land is considered to be in a satisfactory condition and the Permit can be surrendered.

APPENDIX I
DRAWINGS

Schedule 7 - Site plan



EMISSION POINTS TO AIR KEY		
	Exhaust	**Exhaust Type**
EP1	Veolia Boiler 1 Exhaust	Gas Boiler - steam generation
EP2	Veolia Boiler 2 Exhaust	Gas Boiler - steam generation
EP3	Veolia Boiler 3 Exhaust	Gas Boiler - steam generation
EP4	Extraction Tank 1 Exhaust	Water vapour - only during boiling of the extraction tanks
EP5	Extraction Tank 2 Exhaust	Water vapour - only during boiling of the extraction tanks
EP6	Extraction Tank 3 Exhaust	Water vapour - only during boiling of the extraction tanks
EP7	Extraction Tank 4 Exhaust	Water vapour - only during boiling of the extraction tanks
EP8	Extraction Tank 5 Exhaust	Water vapour - only during boiling of the extraction tanks
EP9	Extraction Tank 6 Exhaust	Water vapour - only during boiling of the extraction tanks
EP10	Extraction Tank 7 Exhaust	Water vapour - only during boiling of the extraction tanks
EP11	Drier 1 Exhaust	Moist air - moisture obtained from drying gelatin
EP12	Drier 2 Exhaust	Moist air - moisture obtained from drying gelatin
EP13	Kathabar 1 Regenerator Exhaust	Water vapour - concentration of Kathene
EP14	Kathabar 2 Regenerator Exhaust	Water vapour - concentration of Kathene
EP15	Vacuum Pump Exhaust	Air
EP16	Vacuum Pump Exhaust	Air
EP17	Dust Extraction Exhaust	Filtered air
EP18	Extraction Tank 8 Exhaust	Water vapour - only during boiling of the extraction tanks
EP19	Extraction Tank 9 Exhaust	Water vapour - only during boiling of the extraction tanks
EP20	Extraction Residue Tanks Exhaust	Water vapour - only during boiling of the extraction tanks
EP21	Liming Facility Hot Water Boiler Exhaust	Gas Boiler - Hot Water generation
EP22	New Farm Building Space Heater Exhaust	Gas Space Heater
EP23	Millennium Farm Building Space Heater Exhaust	Gas Space Heater
EP24	Sludge Tank Odour control System Exhaust	Water Vapour - Odour Control System
EP25	Balance Tank Odour Control System Exhaust	Water Vapour - Odour Control System
EP26	Old Farm Building Odour Control Exhaust	Water Vapour - Odour Control System
EP27	New Farm Buildings Odour Control Exhaust	Water Vapour - Odour Control System
EP28	Balance Tank Odour Control System Exhaust	Air - Odour Control System
EP29	Sludge Tank Odour control System Exhaust	Air - Odour Control System

SALT SATURATOR VESSEL
WATER WORKS
A21 PRODUCTION BUILDING
BLENDER BUILDING
A22
A5
A4
A3
CAR PARK
A6 OFFICE
PUMPING STATION
DP2
SEVERN ROAD
SCREENING SYSTEM
A15 EGAN WASTE
FEED PUMPS
BUNDED BALANCE TANK
A13
A12
A17
A16
TAFFS MEAD ROAD
CAMBRIA MODEL
TONTEG ROAD
DP1
HYDROGEN PEROXIDE VESSEL
A18 OLD FARM
A18 NEW FARM
A18 NEW FARM
GWAELOD-Y-GARTH ROAD
EFFLUENT PUMPING STATION

LEGEND

- ENVIRONMENTAL PERMIT BOUNDARY
- EP EMISSION POINTS TO AIR
- DP EMISSION POINTS TO SEWER
- SCREENING SYSTEM
- FEED PUMPS
- BALANCING TANKS
- PUMPING STATION
- SALT SATURATOR VESSEL
- HYDROGEN PEROXIDE VESSEL
- DAA PERMIT EPR/BB3097ZS

0m 25m 50m 75m 100m 125m

N

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Drawing Title: SITE LAYOUT PLAN

Rev	Date	Details	Chkd
Date: 29/09/2023	Scale: 1:1250 @ A3	Drawn by: GTB	Checked by: SM	Approved by: SM

Drawing Status: WORKING DRAWING
Drawing Number: PBGE.01.09-01
Rev: -

SALT SATURATOR VESSEL
E1
WATER WORKS
E24
A21
PRODUCTION
BUILDING
BLENDER
BUILDING
A22
A5
A4
A3
CAR PARK
A6 OFFICE
E22
E21
DP2
PUMPING
STATION
E26
E2
E3
E1
E25
SCREENING SYSTEM
A15
EGAN WASTE
E4B
E5
FEED PUMPS
A13
A12
SEVERN ROAD
TAFFS MEAD ROAD
CAMBRIA MODEL
TONTEG ROAD
BUNDED BALANCE TANK
E6
E7
A17
A16
DP1
DAF Liquid
Effluent
F17
HYDROGEN PEROXIDE VESSEL
E8
E9
E10
A18 OLD FARM
E20
E19
A18 NEW FARM
E18
A18 NEW FARM
E17
E14
E15
E15
S16
GWAELOD-Y-GARTH ROAD
E11
E12
E13
S17
PUMPING STATION OVERFLOW
EFFLUENT
PUMPING
STATION

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.

0m 25m 50m 75m 100m 125m

N

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Project Title: PB GELATINS / PB LEINER UK
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Drawing Title: DRAINAGE ARRANGEMENTS PLAN

Rev	Date	Details	Chkd

Date	Scale	Drawn by	Checked by	Approved by
10/05/2023	1:1250 @ A3	GTB	SM	SM

Drawing Status: WORKING DRAWING

Drawing Number: PBGE.01.09-02

Rev: -

APPENDIX II
NRW MEETING MINUTES

MEETING MINUTES	Date: 7th March 2025

Support to Surrender Environmental Permit

CHAIRMAN: Neil Davies
ATTENDEES: MRC, MM, DP
Excused: SC, CC, BW

Minutes – SUMMARY

The meeting was arranged to discuss the surrender of the environmental permit, due to the site closure.

Mauricio explained the status of the site closure process and the intended dates. The Gelatin production will end on 25th June 2025, the site will continue to operate the blending plant until 25th July 2025 and then shipping of product will continue until 31st October 2025.

Dale advised that we require to surrender the river water abstraction licence as a separate item, he believes that this is a very short document, only one or two pages.

Dale advised that we download Regulatory Guidance RGN9, which outlines the requirements to surrender a permit. Neil downloaded the guidance note during the meeting.

Dale enquired about what are the plans for the site, as if it is sold and the purchaser requires an environmental permit to operate, it would be easier to transfer the permit, Mauricio explained that the Business Unit management had not informed him of their plans for the site, once the production has ceased.

There was a discussion on the items in the surrender charge tool excel spreadsheet and Dale was asked if we could be considered for a low-risk surrender, due to the amount of site investigations carried out, the regular monitoring of the bulk chemical installation, and to carry out further ground water sampling, as we have seven sample points. In the charge surrender tool it ***states "Does your application meet the requirements for a low-risk surrender? (This must have been agreed with your Regulatory Officer prior to submitting your application)"***. Dale is to discuss this with the permitting team, but he believes our request will be refused, due to the number of incidents.

Neil requested Dale to confirm what surrender application band we are included in, as this can be from 1 to 4. Dale confirmed that the banding is based on the Operational Risk Assessment (OPRA) score and ours is 96. Dale will confirm the banding with the permitting team.

Neil asked if we require to submit a formal notice to the NRW that we are closing, but Dale was happy that he had been informed.

The permit surrender application process was discussed and Dale explained that it would be in the process with the other applications to the NRW and so could take up to a year. Dale was happy for this to be submitted, once the production has discontinued.

Dale explained that once the site has been emptied and of product, chemicals and other items which can cause environmental pollution has been removed from site, he will carry out a site inspection.

Neil requested to what standard is required to prove the that vessels are empty, a formal certificate of a tank wash, from a service provider, or can PB Gelatins managing the empty and washout tanks in a safe manner. Dale was happy with the latter.

Neil explained that Heather Peper from Dŵr Cymru Welsh Water (DCWW) would like to be involved with the surrender process and site closure and he asked if Dale had any objections to this. Dale was happy to involve DCWW.

Dale enquired if everything was addressed with the issue with the overflow from the pumping station, directly to DCWW foul drainage system, which Neil confirmed had been rectified. Mauricio enquired if there were any open actions from Compliance Assessment Reports (CAR) and Dale confirmed that there are no outstanding actions

DECISIONS

Inform ECL that we will require to surrender the river abstraction permit, which is separate to the environmental permit.
Confirm surrender application banding

ACTIONS

ID	Description	Responsible	Due Date	Status
1	Inform ECL regarding the abstraction permit	Neil	14/3/25	
2	Confirm surrender application banding	Dale	TBA	
3				
4				
5				
6				
7				

AOB

APPENDIX III
DECOMMISSIONING TASKS

Area	Sub Area	Description	Comments
A18	Effluent	Clean Effluent balance tank	Completed
A18	Effluent	Drain Effluent balance tank chemical scrubber unit	Completed
A18	Effluent	Clean pumping chamber	Completed
A18	Effluent	Clean DAF Unit	Completed
A18	Effluent	Clean DAF sludge tank	Completed
A18	Bulk Chemicals	Empty & Clean Sulphuric Acid Tank	Completed
A18	Bulk Chemicals	Flush out Sulphuric Acid pipe work	Completed
A18	Bulk Chemicals	Empty & Clean Caustic Soda Tank	Completed
A18	Bulk Chemicals	Flush out Caustic Soda pipe work	Completed
A18	Bulk Chemicals	Empty & Clean Hydrogen Peroxide Tank	Completed
A18	Bulk Chemicals	Flush out Hydrogen Peroxide pipe work	Completed
A18	Bulk Chemicals	Empty & Clean Phosphoric Acid tank	Completed
A18	Bulk Chemicals	Flush out Phosphoric Acid pipe work	Completed
A18	Liming	Empty & Clean Lime Silo	Completed
A18	Liming	Empty & Clean Lime Mixing Pits	Completed
A18	Liming	Drain water system	Completed
A18	Liming	Clean New farm building drainage channels	Completed
A18	Liming	Clean Millenium farm building drainage channels	Completed
A18	Liming	Drain water from Farm Portakabin	Completed
A18	Liming	Isolate gas supply to space heating	Completed
A18	Liming	Isolate gas supply to farm boiler	Completed
A18	Liming	Empty & clean internal recovered water tank	Completed
A18	Liming	Empty & clean external recovered water tank	Completed
A21	Bulk Chemicals	Empty & Clean Trufloc TAC40 Vessel	Completed
A21	Bulk Chemicals	Empty & Clean Caustic Soda Vessel	Completed
A21	Bulk Chemicals	Flush out Caustic Soda pipe work	Completed
A21	Bulk Chemicals	Empty & Clean Caustic Soda day tank	Completed
A21	Bulk Chemicals	Flush out Caustic Soda pipe work	Completed
A21	Bulk Chemicals	Empty & Clean HCL tank	Completed
A21	Bulk Chemicals	Flush out HCL pipe work	Completed
A21	Bulk Chemicals	Empty & Clean HCL scrubber tank	Completed
A21	Bulk Chemicals	Empty & Clean Acetic Acid tank	Completed
A21	Bulk Chemicals	Flush out Acetic Acid pipe work	Completed
A21	Bulk Chemicals	Empty & Clean Phosphoric Acid tank	Completed
A21	Bulk Chemicals	Flush out Phosphoric Acid pipe work	Completed
A21	Bulk Chemicals	Empty & Clean Recovered Acid tank	Completed
A21	Bulk Chemicals	Empty & Clean Salt saturator	Completed
A21	Bulk Chemicals	Flush out Brine pipe work	Completed

A21	Extraction	Empty Hydrogen Peroxide dosing storage tank	Completed
A21	Extraction	Clean drainage system	Completed
A21	Filters	Dispose of filter pads	Completed
A21	Filters	Clean drainage system	Completed
A21	De-Ionisers	Remove & dispose of resin from Alpha C1	Completed
A21	De-Ionisers	Remove & dispose of resin from Alpha C2	Completed
A21	De-Ionisers	Remove & dispose of resin from Alpha A1	Completed
A21	De-Ionisers	Remove & dispose of resin from Alpha A2	Completed
A21	De-Ionisers	Remove & dispose of resin from Alpha A3	Completed
A21	De-Ionisers	Remove & dispose of resin from Beta C1	Completed
A21	De-Ionisers	Remove & dispose of resin from Beta C2	Completed
A21	De-Ionisers	Remove & dispose of resin from Beta A1	Completed
A21	De-Ionisers	Remove & dispose of resin from Beta A2	Completed
A21	De-Ionisers	Remove & dispose of resin from Water Softener	Completed
A21	De-Ionisers	Drain Water Softener brine tank	Completed
A21	De-Ionisers	Drain Alpha brine tank	Completed
A21	De-Ionisers	Drain Alpha recovered acid tank	Completed
A21	De-Ionisers	Drain Beta brine tank	Completed
A21	De-Ionisers	Drain Beta recovered acid tank	Completed
A21	Chilling	Recover Ammonia from Compressor No 1	Completed
A21	Chilling	Recover Ammonia from Compressor No 2	Completed
A21	Chilling	Empty & clean glycol tank	Completed
A21	Kathabar	Drain and clean Kathabar No 1	Completed
A21	Kathabar	Drain and clean Kathabar No 2	Completed
A21	Kathabar	Dispose of Kathene	Completed
Blender	Heating	Isolate gas supply	Completed
A21	Steam	Isolate gas supply	Completed
A21	Steam	Empty & clean oil storage vessels	Completed
A21	Steam	Drain Boiler No 1	Completed
A21	Steam	Drain Boiler No 2	Completed
A21	Steam	Drain Boiler No 3	Completed
A21	Effluent	Empty & clean pumping chamber and bund	Completed
A21	Effluent	Empty & clean balance tank	Completed
A21	Water Works	Empty and clean Floculators	Completed
A21	Water Works	Empty & Clean settling pits	Completed
A21	Water Works	Empty and clean grade 1 reservoir	Completed
A21	Water Works	Empty and clean grade 3 reservoir	Completed

Date Taken 23/06/2025

Bulk Chemical	Concentration	Quantity (ton)	Comments	Date Vessel was empty
			16/07/2025 3.9 ton in the storage vessel, started to dilute the contents	
			16/07/2025 Tanker pipe work flushed out with process water	
A18 Phosphoric	75%	7.9	20/8/25 Tank filled with water and drained	20-Aug-25
			4/09/25 Tank emptied by Qualitech and contents delivered to Aquatreat FOC	
A18 Sulphuric	77%	25.1	5/9/25 Tank cleaned by Qualitech and the washing sent for treatment	04-Sep-25
			05/07/25 2.8 ton in the storage vessel, started to dilute the contents	
A18 Caustic	47%	4.17	20/8/25 Tank filled with water and drained	20-Aug-25
			07/07/25 Diluted contents and started to discharge through for processing in effluent treatment system	
			09/07/2025 Diluted the contents further and discharged through effluent treatment system.	
			11/07/2025 Flush fill line to vessel with process water.	
A18 Hydrogen Peroxide	35%	7.41	18/07/2025 Flushed out feed line to A18 Ossein reception.	11-Jul-25
			18/06/2025 Lime has been discharged from the silo and is being processed through internal effluent treatment system	
			17/07/2025 Qualitech started to empty lime silo	
A18 Lime		75.52	18/07/2025 Qualitech have cleaned the lime silo.	18-Jul-25
			10/07/2025 Started to dilute the contents and discharged through processing in our effluent treatment system	
Truefloc TAC40		2.2	18/7/25 Tank fill with water and drained using air diaphragm pump	18-Jul-25
			7/07/2025 Diluted main tank	
A21 Caustic Main Tank	20%	7.91	22/8/25 Tank filled with water and drained	22-Aug-25
			04/07/2025 started to discharge for processing through internal effluent treatment system	
			22/8/25 Tank filled with water and drained	
A21 Caustic Day Tank	20%	6.84	29/8/25 outlet pipe work removed	22-Aug-25
			09/07/2025 Diluted contents and started to discharge through internal effluent treatment system	
			14/07/2025 Flushed tanker delivery pipe work with process water.	
A21 HCL	32%	11.43	16/07/2025 Vessel empty to level of outlet	16-Jul-25
			04/07/2025 Diluted contents and processing through internal effluent treatment system	
			07/07/2025 Tanker Pipe work flushed through	
			18/07/2025 Flushed out feed pipe work	
A21 Phosphoric	75%	3.18	22/07/2025 Tank pumped out and outlet blanked off	22-Jul-25
			04/07/2025 Diluted contents up to 8.4ton and processing through internal effluent treatment system	
			07/07/2025 Tanker Pipe work flushed through	
			18/07/2025 Flushed out feed pipe work	
A21 Hydrogen peroxide	35%	2.41	22/07/2025 Tank pumped out and outlet blanked off	22-Jul-25
			04/07/2025 started to discharge for processing through internal effluent treatment system	
			07/07/2025 Tanker Pipe work flushed through	
			18/07/2025 Flushed out feed pipe work, Tank empty to outlet	
A21 Acetic Acid	80%	3.41	22/07/2025 Tank pumped out and outlet blanked off	22-Jul-25

Powder Chemical	Quantity (Pallets)	
Aluminium Sulphate	1	Aquatreat has collected this FOC - 24/6/25
Sodium Bicarbonate	7	Aquatreat has collected this FOC - 6/8/25
Sodium Sulphate	7	Collected by Egan Waste - 14/10/25
Pure Dried Vacuum Salt	2	Aquatreat has collected this FOC - 27/8/25
Granular Salt	2	Aquatreat has collected this FOC - 27/8/25
Limebux	3	Aquatreat has collected this FOC - 27/8/25
AWE 30 Ploymer	1.3 IBC's	Aquatreat has collected this FOC - 27/8/25
Cofloc Coagulant	4 IBC's	Aquatreat has collected this FOC - 6/8/25
Antifoam	40 drums	Aquatreat has collected this FOC - 6/8/26
Lithium Chrolide	2 Drums	Collected by Egan Waste - 14/10/25
HCL 32%	2 IBC's	Aquatreat has collected this FOC - 16/10/25
Atana Trufloc CWE40 (823)	3 IBC's	Arranged for Egan Waste Service to Collect 25/11/25