

Compliance Assessment Report

Report ID:
CAR_NRW0035996

This form will report compliance with your permit as determined by an NRW officer

Site	PB Gelatins EPR/DP3030ZC	Permit Ref	DP3030ZC		
Operator/Permit holder	PB Gelatins UK Limited				
Regime	Installations				
Date of assessment	05/11/2019	Time in	10:30	Out	12:30
Assessment type	Report/Data Review				
Parts of the permit assessed	Returns				
Lead officer's name	Harris, Geraint				
Accompanied by	Willey, David				
Recipient's name/position	Julie Campbell/ Health, Safety and Environmental Manager	Date issued	27/11/2019		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
B4 - Infrastructure - Containment of stored materials	C3	3.2.3

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	4
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

CAR Form following site inspection on 6th November 2019

Actions carried forward

ACTION: PB Gelatins to revise their check monitoring to a more suitable time when the kit is under most strain or revise the media replacement to an annual change.

Ongoing. There are now monthly checks in place of the media. The frequency of the media changed will be confirmed by PB Gelatins.

ACTION: PB Gelatins to explain why there has been a reduction in the solid bone waste exported from the site.

Carried forward. This action is discussed further in the Annual report section of this CAR Form.

ACTION: PB Gelatins to provide the reasons for the reduction in energy efficiency at the site.

Carried forward. This action is discussed further in the Annual report section of this CAR Form.

ACTION: PB Gelatins to consider these improvements and provide timeframes for implementation or suitable justification for not incorporating the BAT Conclusions.

ACTION: PB Gelatins to supply the procedure that sets out the frequency of inspections, calibration, maintenance and cleaning. This should form part of the sites EMS and reflect any manufacturers requirements.

ACTION: PB Gelatins to investigate the potential of installing a meter closer to the point of abstraction or provide an alternative measure to demonstrate the equal amount of water at point of abstraction and at the current meter reading location.

ACTION: PB Gelatins to provide evidence demonstrating calibration procedures and where and how these calibration records are saved. -Please provide records of when the meter has been calibrated over the past 7 years.

ACTION: PB Gelatins to provide the serial number of the water meter.

ACTION: The licence holder shall retain evidence of current certification for inspection by NRW.

ACTION: PB Gelatins to provide a screen shot from the PLC system used to record the abstraction rate / volumes.

ACTION: Please provide hourly, daily and yearly meter readings between the day this request has been received and at least 7 years previously. This data will be used to ensure compliance with the abstraction license and limits.

ACTION: PB Gelatins to provide procedures for assessing river levels during low flows and provide contingency measures.

ACTION: *PB Gelatins to explain why there has been a reduction in the solid bone waste exported from the site.*

Carried forward.

ACTION: *PB Gelatins to provide the reasons for the reduction in energy efficiency at the site.*

Carried forward.

ACTION: Please could PB Gelatins provide some additional information into the reduction in efficiency at the site from previous years?

ACTION: Please could PB Gelatins confirm whether there is measured data of the effluent leaving the site?

Site update

There is a new contact at PB Liner, Julie Campbell, and a new Regulatory Officer for the site, Geraint Harris.

A site meeting was requested to discuss the 5-yearly submission of the groundwater review. PB Liner were due to submit the report in July 2019, PB Liner have requested an extension to this deadline.

ACTION: PB Liner to propose a scope of the works and associated timelines for undertaking the work.

The idea of the 5-yearly groundwater review is to assess whether there is any potential contamination. The assessment should therefore use the data contained as part of the initial site condition report to help determine whether there have been any negative impacts.

Useful guidance and templates can be found in our website using the links below:

[Environmental Permitting Regulations Guidance for applicants H5 - site condition report guidance and templates](#)

[European Commission Guidance concerning baseline reports](#)

RGN9 sets out the lifetime approach and can be used to understand what would be required if you were to surrender and what would be expected from us.

<https://naturalresources.wales/media/682295/rgn-9-surrender.pdf>

Site walkover

A site walkover was undertaken to familiarise the new Regulatory Officer with the site's layout. The following observations were noted.

There have been significant improvements undertaken at the site to further control the potential for an odour release of site. These include:

- Covering of the balance tank
- An associated chemical scrubber to treat the odorous air from the balance tank
- A new sludge tank and associated pipework
- Installation of a cover in the pumping station and associated scrubber
- A buffer tank in the pumping station

As a result of the investment and effort made by PB Liner there have been no odour complaints received over the summer months.

During the visit IBCs storing hypochlorite were noted without effective bunding / leak prevention in place. These were at the old farm and to the rear of the production building in the waterworks area. These were flagged to PB Liner during the visit.

Considered a Category 3 breach of permit condition 3.2.3 of the permit where all liquids in containers whose emission may cause pollution shall have secondary bunding.

Concerns were raised by PB Liner as to the capacity of the culvert to the North West of the production building and how it floods during high rainfall. This has led to localised flooding in the production building. PB Liner will be looking to mitigate against this by constructing barriers near to the screening area.

ACTION: In line with permit condition 1.1.1 of the permit the accident management plan should be reviewed to include the potential of flooding and what measures are proposed to reduce the impact on the site's operations.

ACTION: PB Liner to investigate / report the gas odour noticed during the site visit located to the rear of the production building.

The screw press is now working effectively and is reducing the COD of the resulting waste water when discharged to sewer. The sludge is collected in an open skip within the building. Odours from the sludge is restricted to the immediate area and not likely to cause a nuisance off site.

BREF update

PB Gelatins are permitted under Section 6.8 for The Treatment of Animal and Vegetable Matter and Food Industries for the disposing of or recycling animal carcasses or animal waste. As part of the BREF process PB Liner are a candidate site to the BREF process that will help influence the resulting BATc.

END

EPR Compliance Assessment Report

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Site	PB Gelatins EPR/DP3030ZC	Permit Ref	DP3030ZC
Operator/Permit holder	PB Gelatins UK Limited	Date	05/11/2019

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
B4	C3	Ensure appropriate bunding in place	31/12/2019

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.