

Compliance Assessment Report

Report ID:
CAR_NRW0036429

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	06/03/2020	Time in	N/A	Out	N/A
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Monitoring				
Lead officer's name	Harris, Geraint				
Accompanied by					
Recipient's name/position	Julie Campbell/ HSE Manager	Date issued	06/03/2020		

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
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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	0	Total compliance score (see section 5 for scoring scheme)	0
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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

PB Leiners

Permit DP3030ZC

The Following are historic actions that have not been answered. This data will be used to ensure compliance with the abstraction license and limits. Please provide answers as soon as possible.

ACTION:

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

ACTION:

PB Leiner 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 Leiner to provide evidence demonstrating calibration procedures for the water meter 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 Leiner 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 Leiner 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.

ACTION:

PB Leiner to provide procedures for assessing river levels during low flows and provide contingency measures.

Groundwater Review

The 5-yearly submission of the groundwater review has been received and is being reviewed by the Geoscience team at NRW.

Flooding

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.

PB Leiners were flooded by the River Taff in the early hours of Sunday 16th February. No loss of any product or chemicals to the environment occurred. The plant was shut down safely. The site informed NRW promptly of their situation and forewarned of the potential of odours during the clean-up. No odour complaints have been received by NRW since the flood.

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.

Annual report

The annual performance report was received on the 21st January 2020. The report stated that the monitoring undertaken in line with its Welsh Water consent have all been compliant. The monitoring frequency has now been changed by Welsh Water to monthly instead of fortnightly. During 2019 PB Leiners achieved improvements in all performance parameters. However, there was a significant increase (42%) in the amount of mains water. PB Leiners must investigate why such a large increase has occurred. PB Leiners have undertaken several improvements on site, notably the construction of a cover for the Balance tank. Since implementation of these measures there have been no odour complaints associated to the site.

Action:

PB Leiners to investigate the substantial increase in mains water use in 2019.

END.

EPR Compliance Assessment Report

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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			

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.