

Compliance Assessment Report CAR_NRW0037504

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 carried out: Report/Data Review, Reason: Routine.

On 05/02/2021.

Parts of permit assessed: Annual Returns

NRW Lead Officer: Geraint Harris.

Report sent to: Julie Campbell, HSE Manager on 05/02/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	

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

Total number of non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

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

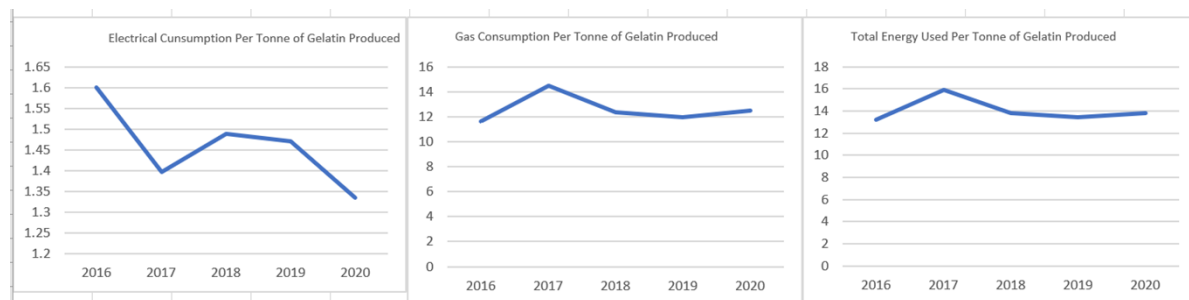
PB Leiners

EPR/DP3030ZC

Annual returns and report.

NRW received the annual report on the 27th January 2021. It was decided to review the trends in their reportable data over the past five years to gain a better understanding of the resource efficiency.

Energy Usage



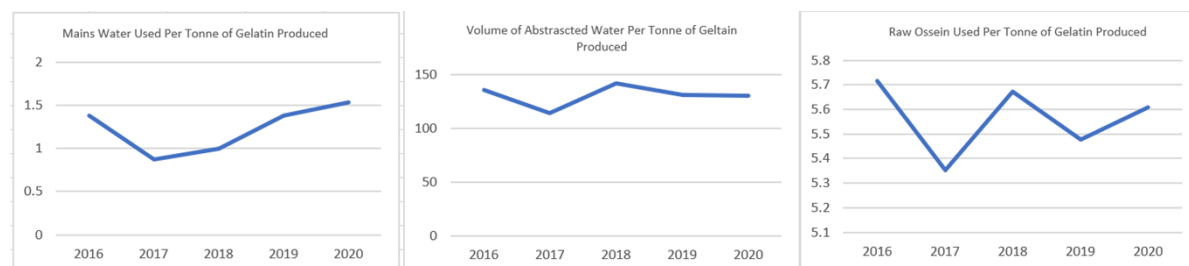
5 Year Trends

PB Leiners increased their Gelatin production by 2.4% when compared to 2019. There was a 7.11% decrease in the amount of electrical consumption in 2020 compared to 2019, and there has been a 9.29% reduction in electricity consumed per tonne of Gelatin produced. NRW are pleased to see that over the last 5 years the overall electrical consumption shows an improving electrical efficiency pattern.

There was a 7.01% increase in the amount of gas consumed in 2020 compared to 2019, which has resulted in a 4.5% increase in gas consumed per tonne of Gelatin produced. This was down to the installation, in February, of two space heaters in the millennium farm and the farm, to control the internal temperature. Consequently, there was a 5.46% increase in the total energy usage in 2020 compared to 2019, leading to a 2.99% increase of total energy usage per tonne of Gelatin produced. After reviewing the 5-year pattern of both Gas consumptions and total energy used, there is no real pattern of improvement, with the most efficient period being in 2016. The annual report states 'A review to identify suitable opportunities to improve the energy efficiency of the activities at PB Gelatines is taking place yearly'.

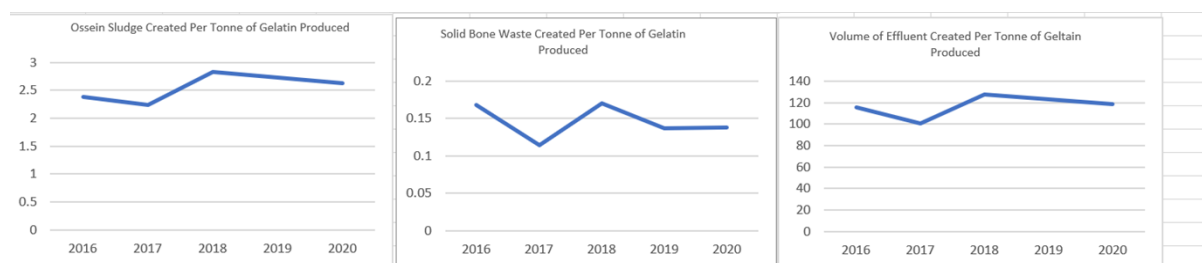
Action1: I would like to see a copy of the most recent review and also know how you intend to improve both of these parameters going forward? **Due 1st March 2021**

Use of Raw Material



Net production of Gelatin increased by 2.4% from previous year with a 4.9% increase of raw Ossein material used in 2020 compared to 2019. However, this has resulted in a 2.4% increase of raw ossein used per tonne of Gelatin produced. This means that the process has become less efficient. Looking at the 5-year pattern, there is no overall improving trend in efficiency. As for abstracted water, there was a 1.85% increase in the abstracted volume in 2020 when compared to 2019. When related to per tonne of Gelatin this shows a 0.55% reduction in water abstracted per tonne of Gelatin. However, the overall trend over the 5 years shows no significant improvement in extraction volumes. The use of mains water (domestic use – non production) use has increased by 14.02% from last year. There was a leak found on site and was fixed in October. The trend over the past 5 years shows an increasing usage of mains water. A review to identify whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water takes place annually according to PB Leiners.

Action 2: Please provide evidence of this and your plan to try and reduce the use of mains and abstracted water? **Due 1st March 2021**



There was a 1.38% decrease in the amount of Ossein sludge waste in 2020 compared to 2019, which has resulted in a 3.7% reduction of Ossein sludge waste per tonne of Gelatin produced. There was a 1.19% reduction in effluent to sewer in 2020 when compared to 2019. This resulted in a 3.51% reduction in effluent per tonne of Gelatin produced. There was a 3.47% increase in the amount of solid bone waste in 2020 compared to 2019, and there has been a 1.04% increase of solid bone waste per tonne of Gelatin produced. Looking at the 5 year trends for each of the waste streams there appears to be no real improvement in their production levels when compared to the amount of Gelatin produced.

Permit requirement 1.3.1.© states “review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use.” And how to comply with your environmental permit states “Carry out a review of water use (a water efficiency audit) at least every four years. The first audit shall take place within two years of the issue of your permit unless your application has included details of a satisfactory audit carried out in the two years prior to submission of the application.” Have you undertaken such a review? Do you have a plan to try to reduce water usage?

Action 3: Have you undertaken a review of these processes? how do you intend on reducing these levels? **Due 1st March 2021**

Monitoring - Site Effluent

Table S3.3 Process monitoring requirements

Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
DP1	pH	Continuous		
DP1	Suspended Solids	Weekly		
DP1	COD	Weekly		
DP1	Discharge Flow	Continuous		
Site perimeter	Odour	Daily		

Table S3.3 Process Monitoring Requirements is stated above. The site effluent is currently monitored on a monthly basis by Dwr Cymru. There are no discharge limits stated in the permit. However, the site should have a discharge consent from Dwr Cymru. According to improvement condition 11, the monitoring and measurement procedure submitted in 2014; "Monitoring of the discharge of effluent for the site will be collected and recorded on the PBG Discharge Monitoring Form to demonstrate compliance to levels determined in the PBG discharge consent." Is this still the case?

Action 4: Please send a recent copy of this completed form so that an appreciation for the levels of the parameters stated in table s3.3 can be made. **Due 1st March 2021**

Action 5: Please can provide NRW with the Dwr Cymru discharge consent limits. **Due 1st March 2021**

Action 6: Please provide NRW with the method used to continuously monitor the pH and Discharge flow. **Due 1st March 2021**

Odour

NRW are not aware of any odour complaints relating to PB Leiners site and associated activities in 2020. A recent series of onsite improvements has significantly improved the odour management on site. Furthermore, PB Leiners have introduced a notification system to pre-warn when an odour generating process is likely to take place, such as cleaning of the balance tank. Additionally, such processes have been planned for times that are less likely to affect the local vicinity.

Noise and Dust

There were no noise or dust complaints in 2020 relating to the site.

Monitoring – Groundwater

A desktop appraisal of the condition of the ground within the site boundary was received in 2020. It was accepted that before the 10-year report was required, PB Leiners would install boreholes for the purpose of sampling.

Please complete all actions by 1st March 2021.

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.

What are suspended scores?

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 and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 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 – 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.