

Compliance Assessment Report CAR_NRW0037714

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 26/02/2021 - 02/03/2021.

Parts of permit assessed: Energy/water/waste and sewer discharge

NRW Lead Officer: Geraint Harris.

Report sent to: Julie Campbell, Health, Safety and Environment Manager on 02/03/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
H2 - Resource Efficiency - Energy efficiency	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**

As a result of receiving PB Leiner's annual returns, CAR_NRW0037504 was issued. Within this CAR Form was

several actions for the site to complete by the 1st of March 2021. The actions and the responses are as follows:

Energy Efficiency:

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'. Action 1: 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.

PB Leiner Response:

"PB Leiner at local, and corporate level, are reviewing sustainability on all inputs and outputs. PB Leiner also had a company in CRP in, to undertake an energy review to identify opportunities. The final report back is awaited."

No copy of a past energy review was provided. This will be something that is audited in future site visits. However, since PB Leiner have proactively employed the use of a third party to undertake an energy review NRW are satisfied that they are meeting their permit requirements related to energy efficiency.

Raw Material:

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

PB Leiner Response:

"Projects for water recovery have been budgeted for this year. Scopes are being defined and by the end of May, we will be in positions to present this."

It is unclear whether this review happens annually, since no evidence was provided. NRW welcomes the news that projects for water recovery have been budgeted for this year and looks forward to seeing the results.

Action 3:

Permit requirement 1.3.1.c 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

PB Leiner Response:

"5-year trend of yield has demonstrated that we have improved and this is an ongoing review on how we can improve. Going forward the 7K project, which was presented to NRW on the 10-02-2021, will improve our process"

On the 10th February 2021, PB Leiner's presented NRW with a plan for substantial improvements on the site. As a result of these improvements the site should see increased efficiency within their operations, especially with the Gelatin produced/ossein ratio. Also as mentioned previously projects for water are scheduled for

2021.

Action 4:

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

PB Leiner's response:

"The information is recorded at the change of all shifts and if any alarms are sounded on the system. The information is reviewed daily in the morning Management meeting. This is attached in the email."

It is still unclear whether the 'the PBG Discharge Monitoring Form' is used from the response received. However, a copy of PR4A was sent to NRW that shows the pH and effluent flow measurements and actions taken when they drift from the target range. The remaining parameters on the discharge consent were not mentioned in the response received on the 26th February 2021. Where are the results for the testing of suspended solids and COD recorded? The annual returns state that Welsh Water analysed 12 effluent samples during 2020. The annual report sent every January states that "All samples were within consent compliance limits". Please can you send the results over the past year to NRW so that I can get an appreciation for the levels of the parameters stated in table s3.3?

New Action1: Please can you send a copy of the results of the effluent treatment analysis undertaken by Dwr Cymru over the last 12 months? **Due 15th March 2021.**

Action 5:

Please can provide NRW with the Dwr Cymru discharge consent limits.

Action completed. Discharge consent received on the 26th February 2021.

Action 6:

Please provide NRW with the method used to continuously monitor the pH and Discharge flow.

PB Leiner's response:

"pH and the discharge flow are continuously monitored on our SCADA system. The system will alarm at set points. The DAF system automatically adjusts so that the limits are met."

New Action2: Please can you explain how they are measured in a bit more detail? What type of instruments do you use to measure them? Are they MCERT's certified? **Due 15th 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.