

EPR Compliance Assessment Report

Report ID: DP3030ZC/0242958

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

Site	PB Gelatins UK			Permit Ref	DP3030ZC		
Operator/ Permit holder	PB Gelatins UK Limited						
Date	30/06/2015			Time in	00:00	Out	00:01
What parts of the permit were assessed	Odour management plan and general management						
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge	
Recipient's name/position	Alan Fitzpatrick						
Officer's name	David A Willey			Date issued		30/06/2015	

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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			Condition(s) breached
a) Permitted activities	1. Specified by permit	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	C4	1.1.1;
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	C4	1.1.1;
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	C4	3.4.1;
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	C4	3.4.1;
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),

A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	4	Total compliance score (see section 5 for scoring scheme)	0.4
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Site: PB Gelatins UK Limited

Date: 30th July 2015

Scope

1. Actions carried forward
2. Complaints received and investigations
3. Odour mitigation proposals
4. Improvement programme update

1. Actions carried forward

The Operator will replace the leaking skips used for the collection of waste bone from the rotary drum. The seepage from the skips has the potential to pool and has the potential to cause odour. The Operator will also ensure that waste water collected from the skip is transferred directly into the drains.

Completed. This action has been incorporated into the recently submitted document, 'Review into Odour Issues at A18 Building'.

The Operator will fix door hinges to ensure that doors will shut automatically. This requirement should be incorporated into the sites EMS.

This action has been completed.

NRW to forward link to sector guidance for effluent treatment plants and associated BREF notes.

The Food and Drink Sector (EPR 6.10)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/298072/geho0209bpiy-e-e.pdf

Point source emissions on page 23 identifies BAT for emissions to water and touches on MBR.

Food, Drink and Milk Industries BREF Note.

http://eippcb.jrc.ec.europa.eu/reference/BREF/fdm_bref_0806.pdf

Page 426 has details of membrane bio reactors as with section 4.5 providing an overview of end of pipe waste water treatment considered to be the preferable techniques.

The OMP to be amended to include the rotary drum as an odour source and assessed if, and when, a complaint is received.

This action has been incorporated into the recently submitted document, 'Review into Odour Issues at A18 Building' and has been added into the OMP.

PB Gelatin to ensure the rotary drum is cleaned to avoid the build-up of waste on the drum. This will form part of the sites regular cleaning routine through a WPI to avoid the potential of odour.

This has been completed.

ACTION: *PB Gelatin to ensure there is regular cleaning at A21 following unloading of bone to the process area.*

This cleaning procedure should be incorporated into the sites EMS.

This action has been carried forward.

2. Complaints received and investigations

There have been nine complaints received by NRW since the last CAR Form issued on 5th May 2015. The complaints have been submitted by local businesses in close proximity to the A18 building. In addition NRW have undertaken three visits to site in order to substantiate the odour complaints.

NRW were able to substantiate the following complaints

1st June – Complaints received describing a strong odour from the site whilst a tanker was on site. The tanker driver did not connect the pipework with the filter system that minimises odour from the displaced air from the tanker. This led to a strong odour from the tanker. This odour was foreseeable, however, the driver of the tanker was new to the site and was unaware of the onsite procedures in place. **Considered a breach of condition 1.1.1 of their permit where procedures were not followed that resulted in an odour impact off site that was foreseeable. A category 4 breach has been associated with this incident.**

5th June – NRW attended site to witness some of the loading / unloading activities that occur. Whilst at site NRW witnessed the bone skip being pulled out and then tilted to allow the skip to drain any liquid into the drains. At this point there was noticeable odour at the site boundary. The area was washed down after but the odour did linger for approximately 30 minutes.

Considered as a breach of condition 1.1.1 of their permit where the delivery driver was unaware of the potential for odour impact they were causing with associated category 4 breach.

16th June – A complaint was received and NRW attended within approximately 30 minutes. On arrival the odour at the site was very strong. A site inspection was carried out with staff from PB Gelatins who also confirmed that there was a strong odour from the site.

Considered as a breach of condition 3.4.1 of their permit. The odour was associated with where the delivery driver was unaware of the potential for odour impact they were causing with associated category 4 breach

22nd June – Complaint received to NRW with a member of NRW attending to substantiate the call. The NRW officer confirmed that there was a detectable odour from the site. In line with the Odour Management Plan PB Gelatin completed a site inspection and completed the Odour Complaint Form that confirmed that there was odour emanating from the site.

Considered as a breach of condition 3.4.1 of their permit. The odour was associated with where the delivery driver was unaware of the potential for odour impact they were causing with associated category 4 breach

24th June – Whilst visiting a complainant NRW noticed that there was an odour emanating from the pumping station situated close to the south of the Keyline site. On closer investigation it was noted that the effluent chamber was very full with occasional splashing of the effluent out of the chamber that leaked onto the pavement. The amount leaking onto the pavement was very minimal. Photos and a video were taken and sent to PB. PB investigated further and confirmed that the DAF unit was being cleaned by an external company and waste as being diverted to effluent stream. The balance tank level was unusually high due to the set points being altered to allow the water samples to be taken by Nijhaus (water treatment contractor). **To combat this from happening again PB will fit an orifice plate into the effluent line to minimise flow to break tank.**

There have been issues associated with the abatement where high readings of H₂S have been recorded on the 23rd June. Readings taken on 20th April and the 26th May showed an increase from the previous 6 months readings and should have raised awareness that the filters required some attention.

ACTION: PB Gelatins to propose some trigger levels at sample point No.1, No.2 and No.3 in order to ensure these increase levels of H₂S are detected early and enable some early work to be undertaken. This will also form part of the Odour Management Plan.

There have been 4 breaches of the permit since the last CAR Form that all resulted in odour impacts. PB Gelatins are being proactive in their approach to resolving these issues and have produced the document 'Review into Odour Issues at A18 Building' that identifies and provides timelines for undertaking associated work. Based on this, each non-compliance has been given a Category 4 breach, the lowest category for breaches. Ongoing odour complaints are likely to be scored as a Category 3 breach.

3. Odour mitigation proposals

PB Gelatin have submitted to NRW a review of Odour Issues at A18 Building, dated 23rd June 2015. The document identifies and prioritises possible odours sources with the associated likelihood of odour occurring. PB Gelatin have committed to resolving the odour issues associated with its process with the following timelines.

Air scrubber unit

Short term actions

A1 - Purchase dosing pump and additional odour neutralising agent. Modify existing wet scrubber to enable dosing of neutralising agent into spray water by **10/07/2015**

A2 - Evaluate operation of sludge tank to determine if contents can be maintained at low enough level not to over burden the scrubber. This may involve more frequent removal of sludge to minimize the amount and the residence time of sludge in the tank by **20/07/2015**

A3 - Check operation of wet scrubber spray ball and water supply on planned maintenance schedule by **31/06/2015**

Long term actions

A4 - Obtain costs to replace existing wet scrubber with new re-circulating scrubber with integral dosing facility for additional neutralising agent by **20/07/2015**

Pavement area

B1 - Draw up and implement schedule of sniff testing along Taffs Mead Rd. Record relevant data; time, weather conditions, A18 processes in operation by **30/07/2015**

Rotary screen

C1 - Obtain costs to enclose rotary screen by **20/07/2015**

4. Improvement programme update

*a. IC3 – preventative maintenance plan - **completed***

b. IC4 – Pipework moved (Deadline 30th Sept 2015)

This work will not involve the construction of some bunding around the pipework. This is because it would be more cost effective to construct some bunding rather than moving the pipework.

c. IC5 – Tertiary bunding (Deadline 30th Dec 2015)

The plans are in place and will commence in September.

*d. IC6 – Hard standing (Deadline 1st May 2015) - **completed***

*e. IC14 - Drains painted - **completed***

The Odour Management Plan has also been revised and the version currently being implemented is Version 2.

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Operator/ Permit	PB Gelatins UK Limited	Date	30/06/2015

Section 3- Enforcement Response		Only one of the boxes below should be ticked	
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.			X
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.			
We will now consider what enforcement action is appropriate and notify you, referencing this form.			

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
C2	C4	No action specified	N/A
C4	C4	No action specified	N/A
E1	C4	No action specified	N/A
F1	C4	No action specified	N/A

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.