

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						
Date	13/01/2016			Time in	10:00	Out	12:30
What parts of the permit were assessed	Monitoring and improvement conditions						
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		20/01/2016	

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	C3	1.1.1;
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	C3	3.1.1;
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	N	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	A	
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	A	
	2. Energy	A	

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	2	Total compliance score (see section 5 for scoring scheme)	8
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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 meeting 13th January 2016

The purpose of this site visit was to investigate two complaints received by Natural Resources Wales reporting foam being generated from the manholes on Taffs Mead Road.

1st December 2015 at approximately 08:55

The caller provided details of a dreadful smell and seepage from the manhole covers on Treforest Industrial Estate. The caller took pictures at 8.55am. The smell was dreadful and the foam was being blown as it splutters up through the side of the manhole cover.

Considered as a Category 3 breach of the condition 3.1.1 of the permit EPR/DP3030ZC that states there will be no point source emissions to water, air or land except from those sources and emissions points listed in Schedule 3 tables S3.1, S3.2 and S3.3. Although the foam generated does not have the potential to have an environmental impact the control of the effluent and associated mechanisms in place to minimise the foam are not considered to be satisfactory.

10th December 2016 at approximately 11:48

The caller reported effluent foam coming out of manholes on Taffs Mead Rd, Treforest Industrial Estate from PB Gelatins site. It could be seen running down the side of the road towards the highway drains.

Photos were also taken that showed the foaming at the manhole and where the foam had washed to the side of the roads and entered the surface water drainage system. The photos taken also showed oessin deposits on the main road.

Considered as a Category 3 breach of the condition 3.1.1 of the permit EPR/DP3030ZC. As with the complaint received on the 1st December the breach has been score in relation to the control of the dosing and management of the effluent.

After receiving the complaints PB Gelatins have investigated the cause of foam generation in more detail in order to understand the root cause. The foam is produced as the treated effluent from the DAF treatment plant is discharged to Welsh Waters sewer on Taffs Mead Road. Typically the concentration of gelatin in the effluent at this point is <0.1% but when agitated the gelatin produces a stable foam quickly. There are a few contributing factors that have been identified:

1. The dosing of the anti-foaming agent needs to be controlled and checked regularly to ensure there is the correct amount being dosed to the effluent.

2. The level of suspended solids in the effluent has an influence on the foam generation, i.e. the more suspended solids the less foam produced. The effluent being produced is very low in suspended solids and as a result the foam is generated.

3. As the effluent enters the Welsh Water line it enters at a high flow rate and at a 90 degree angle causing some turbulence that produces the foam. An option here is to insert some flexible pipework so that the flow enters the Welsh Water drain in line with the flow of the effluent already flowing in the Welsh Water sewer therefore minimising the turbulence.

ACTION: PB Gelatin to investigate and propose techniques to ensure that foam is not generated as it enters the Welsh Water chamber.

As a temporary measure PB Gelatins are not adding any coagulant to the DAF plant and the effluent is being discharged with higher levels of suspended solids and at a cost to PB Gelatins.

PB Gelatins have previously had some secondary dosing to counter act this following complaints in July 2015 but this was a temporary measure and raised questions as the anti-dosing agent was being tipped from a container into the discharging effluent on the entrance to the bone transfer area.

ACTION: PB Gelatin to put in place a more permanent structure to hose the secondary dosing system.

Energy efficiency

PB Gelatin discussed the new heat recovery system in place where the final boiling of the gelatin is undertaken. The recovered heat is used in the dryers. This has helped make the product better as well as increasing the levels of energy efficiency at the site. This in turn will reduce the temperature of the waste sludge and will help reduce odour generation in the sludge tank.

PB Gelatin are looking to increase production by 12 – 15% and with the improved efficiency. Despite this increase there is no need for the capacity of the Veolia CHP Plant to be increased.

The Effluent Treatment Plant project was also discussed with revised plans being considered.

Site walkover

A site walkover was undertaken to identify the improvements that have been made on site in response to the permits improvement conditions as well as actions identified in the 'Review into Environmental Issues at A18 Building.'

Improvement conditions 4 and 5 have been completed with photos taken during the visit. This included the construction of bunding around the existing pipework rather than moving the pipework. Tertiary bunding has also been put in place at the rear of the Blender Building where the bone is delivered from the Old Farm.

In response to the odour complaints received in 2015 PB Gelatins set out improvements as part of the 'Review into Environmental Issues at A18 Building.' This included the addition of a new wet scrubber that has now been installed and working well. PB Gelatin have also found that the new scrubber is using less water and anti-odour agent therefore reducing costs. Whilst on site no odour was detected near the release point of the scrubber where previously odour has been noticed.

The rotary screen has also been fully enclosed with new stairs installed that makes cleaning and inspection easier and safer. Other work being undertaken involves the angling of the plates on the rotary screen and a new water screen to be installed on the bone transfer area that will reduce spillage of bone and reduce the amount of water being loaded onto the truck. This in turn will avoid spillage from the truck whilst it travels to the process area.

	EPR Compliance Assessment Report	Report ID: DP3030ZC/0255864	
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Operator/ Permit	PB Gelatins UK Limited	Date	13/01/2016

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	C3	No action specified	N/A
E3	C3	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.