

Compliance Assessment Report

Report ID:
CAR_NRW0023773

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	15/06/2016	Time in	10:00	Out	15:00	
Assessment type	Check Monitoring/Sampling					
Parts of the permit assessed	Discharges to water					
Lead officer's name	Willey, David					
Accompanied by	Sarah Patricia Jones					
Recipient's name/position	Alun Fitzpatrick/ Safety Officer	Date issued	18/07/2016			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
B3 - Infrastructure - Site drainage engineering (clean and foul)	C3	1.1.1
	C3	1.1.1
B4 - Infrastructure - Containment of stored materials	C3	3.2.3
E3 - Emissions - Surface water	C2	3.3.1

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	4	Total compliance score (see section 5 for scoring scheme)	43
------------------------------------	---	---	----

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 Gelatins CAR Form – site visit on 15th June 2016

1. Actions from the last CAR Form
2. Drainage
3. Odour
4. Reporting Forms

1. Actions from the last CAR Form

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

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

2. Drainage

PB Gelatins and NRW undertook s dye tracing exercise to investigate the impact on a culvert to the South of the site. The culvert itself has suffered from pollution in the area and NRW are testing a number of potential sources in the vicinity of the Treforest Industrial Estate.

During the exercise it was discovered that effluent from the site was being discharged to the drains that lead to the culvert. The discharge itself gave rise to steam from the exposed drain. This was dye tested with the resulting dye appearing at the culvert.

The discharge from the site itself is not authorised by the permit and was unknown to the Operator at the time. The non-compliance resulted in a pollution off site considered to be a Category two incident as defined in the Common Incident Classification Scheme. **This is reflected as a Category two breach of permit condition 3.3.1 for an unauthorised discharge where a non-compliance at a regulated site could foreseeably result in pollution classified as CICS category 2.**

Substantial work has since been undertaken by PB Gelatins to re direct the discharge and to ensure that the impact on the culvert is stopped. The impact from the discharge on the culvert offsite is being investigated by the Natural Resource Management Team with any resulting actions coming from that team.

There are additional non-compliances with the following resulting actions.

The discharge to the culvert has remained unknown to PB Gelatins and entered the drain system on an area of the site considered unused and PB Gelatins were of the understanding that all process discharges went to the internal sewer connections.

This is considered to be a category three breach of permit condition 1.1.1 where the operators EMS referenced EMS-MAN should have identified potential environmental impacts that would include these drains as part of their internal drainage plan.

ACTION: PB Gelatins to update their drainage plan in light of the recent event and undertake an investigation of other potential historic drains on their land.

ACTION: PB Gelatins to provide the results of the drain survey to NRW to ensure that all drains have been identified in that area of the site.

During the inspection of the drains it was noted that a number of IBCs and drums were being stored in an area not appropriately bunded.



IBCs being stored in an unbunded area.



IBCs being stored in an unbunded area.



IBCs containing Ultra Low Bromate Sodium Hypochlorite 14/15%. Corrosive.



Barrels being stored in inappropriate bunded area.



Mono propylene glycol 33%.

Considered a Category 3 breach of permit condition 3.2.3 of the permit where all liquids in containers whose emission may cause pollution shall have secondary bunding.

ACTION: PB Gelatins to ensure all IBCs / barrels containing chemicals and raw materials are stored in appropriately bunded area.

During the dye investigations it was noted that the drain located near to the water works was not

collecting the water correctly.



Effluent and water collected at drain was not directed down the drain and instead discharged through a gap to the side of the drain.



Location of drain

Considered to be a category 3 breach of permit condition 1.1.1 of the permit with respect to maintenance of the drains.

3. Odour

NRW have received the following odour complaints:

4th April 2016, 5th May 2016, 23rd May 2016, 10th June 2016 and 13th June 2016.

None of these complaints were substantiated, however, when notified, PB Gelatins investigated the complaints in line with the agreed odour management plan. NRW advised the complainants to contact NRW directly if they feel the situation is not improving or that PB Gelatins are not responding to the complaints.

The Peacemaker and wet scrubber were tested as part of their calibration to ensure the equipment is working effectively. The testing was undertaken by a third party with the peacemaker / activated Diox wet

scrubber system found to be in good all round condition.

The assessor noted that perceptible odours were evident at the time of their visit post treatment in the wet scrubber. The assessor made the following comments that have been included as actions to this CAR Form:

ACTION: PB Gelatins to modify the addition of activated Diox into the scrubber to eliminate odour from the scrubber.

ACTION: The diox should be left to activate the mixture for 24 hours before adding to the wet scrubber.

ACTION: Amines are passing through the Peacemaker (dry scrubber) and resulting in higher levels of the diox being used to eliminate the amines from final discharge. PB Gelatins to investigate the most cost effective way of abating the amines discharge.

4. Reporting forms

The following reporting forms have been received with the resulting comments:

Annual report

All improvement conditions have now been completed by PB Gelatins. PB Gelatins have their own list of actions that arise through site meetings and the associated CAR Forms as well as actions being recommend by third parties.

ACTION: PB Gelatin to provide the annual production figure for 2014?

A variation to the permit is required by PB Gelatins to include the steam boilers operated by Veolia but the permit will be held by PB Gelatins with internal agreements between the two companies.

A liaison group meeting was held on the 12th May 2016. No issues were raised during the meeting and the attendees were encouraged to contact NRW/PB Gelatins if they have any complaints.

NRW propose to undertake an audit of PB Gelatins EMS in 2016. Date and time to be agreed between NRW and PB Gelatins.

End



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0023773**

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	15/06/2016

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.

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			
E3	C2	Ensure drainage plans are up to date with surveys undertaken of existing infrastructure.	30/09/2016
B3	C3	Ensure connections are in working order	30/09/2016
B4	C3	Ensure appropriate bunding installed.	30/09/2016
B3	C3	Update internal drainage plans.	30/09/2016

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 reports 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 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.