

EPR Compliance Assessment Report

Report ID: DP3030ZC/0238549

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	28/04/2015			Time in	10:00	Out	12:30
What parts of the permit were assessed	Improvement programme and odour mitigation						
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op		Water Discharge
Recipient's name/position	Alan Fitzpatrick						
Officer's name	David A Willey, Richard Taylor			Date issued		05/05/2015	

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	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	A	
	2. Management system & operating procedures	A	
	3. Materials acceptance	C4	1.1.1;
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	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	A	
	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

1

Total compliance score
(see section 5 for scoring scheme)

0.1

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: 28th April 2015

Time: 10:00

Scope

1. Actions from last meeting
 - a) PB to clear drains by waste skip.
 - b) PB to ensure doors closed when not in use at Old Farm.
 - c) PB to clear drains at transfer area of Old Farm.
 - d) Barrier at sludge tank.
 - e) Site sign
2. Complaints received to NRW and OMP
3. Improvement condition update
 - a) IC3 – preventative maintenance plan
 - b) IC4– Pipework moved
 - c) IC5 – Tertiary bunding
 - d) IC6 – Hard standing
 - e) IC14 - drains painted
4. Annual returns and Pollution Inventory
5. ETP update
6. Site inspection

1. Actions from last meeting

Since the last visit in February 2015 the Operator has made good progress with the improvement programme and there are noticeable improvements at the Old Farm in regards to odour mitigation and good housekeeping. The following actions have all been addressed:

a. PB to clear drains by waste skip.

Some very good work has been undertaken on the drains around the skip with gradient enabling the collected water to flow and avoid accumulating and potentially generating a stagnant odour.

The drains were also clear of Ossein. PB Gelatins has produced a Work Process Instruction (WPI) for this area of the site to ensure that after a skip is taken away / delivered the area is thoroughly washed down.

b. PB to ensure doors closed when not in use at Old Farm.

The roller shutter door at the Old Farm was closed, however, the access doors were propped open and were not able to close independently.

c. PB to clear drains at transfer area of Old Farm.

Again these drains were clear of Ossein. The Operator confirmed that these drains will also be modified to improve the drainage and avoid build-up of stagnant water and Ossein.

d. Barrier at sludge tank.

The Operator confirmed that the barrier will be installed following the completion of the bunding work being undertaken by the sludge tank.

e. Site sign

The Operator has now installed new signs in line with the requirements of the How to Comply guidance.

ACTION: 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.

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

2. Complaints received to NRW and OMP

NRW has received one complaint since the last visit to the site. The Operator undertook the relevant procedure in line with the Odour Management Plan (OMP) and informed NRW of the complaint received. The odour was associated with the emptying of a truck in the Ossein delivery area. There was other activity on the site including civil contractors working on the drains by the waste skip and a tanker delivering sulphuric acid.

The Operator confirmed that the roller shutter door on the A18 building was open at this time. As part of the investigation into odour at the site the Operator needs to ensure that the doors remain closed when not in operation to minimise any potential sources of odour. This is in line with the approved OMP identified in Table 2.2. **The Operator needs to ensure the requirements of the approved OMP are complied with at all times.**

3. Improvement condition update

a. IC3 – preventative maintenance plan

This has been received and is undergoing review by NRW.

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

This work will not involve the construction of dome binding 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)

This work is nearing completion.

e. IC14 - drains painted

The drains have been identified (foul (effluent) and storm) and temporarily painted. Permanent paint will then be used to identify the drains. The Operator has also used GPS to identify the drains.

4. Annual returns and Pollution Inventory

This CAR Form confirms receipt of the PG Gelatins Annual Environmental Performance Report 2014 in line with Condition 4.2.2 of the permit.

The CAR Form also confirms receipt of the Pollution Inventory. PB Gelatin submitted a breakdown of all parameters for the effluent discharge based on 2013 data as a detailed breakdown is not required by the discharge consent held by PB Gelatin.

NRW confirm that future returns should reflect the requirements of the consent only.

5. ETP update

The Operator confirmed that the intention to proceed with an additional effluent treatment plant that will discharge directly to the River Taff is still intended. The Operator is now carrying out additional costings for the project.

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

6. Site inspection

A site inspection was undertaken at the Old Farm on the improvements undertaken as well as the bone intake area at A21. During the inspection the rotary drums were inspected for the potential for odour generation. When situated close to the rotary drum a stronger odour was noticed.

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

ACTION: 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.

During the inspection at A21, where bone is unloaded after being transferred from the Old Farm, deposits of bone were witnessed on the floor near to the unloading area. It is not clear how these deposits were formed but it was clear that any cleaning of the area had not been undertaken. **This did not have a foreseeable impact on the environment and will therefore be score a Category 4 breach of permit condition 1.1.1 under general management.**

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.

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Operator/ Permit	PB Gelatins UK Limited	Date 28/04/2015

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.	☒	
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			
C3	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.