

	EPR Compliance Assessment Report	Report ID: DP3030ZC/0252735			
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	05/11/2015		Time in	10:00	Out 13:00
What parts of the permit were assessed	Odour and improvement programme				
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	23/11/2015	

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)	N			
	4. Containment of stored materials	A			
	5. Plant and equipment	A			
c) General management	1. Staff competency/ training	N			
	2. Management system & operating procedures	A			
	3. Materials acceptance	N			
	4. Storage handling, labelling, segregation	A			
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	N			
	4. Sewer	N			
	5. Waste	N			
f) Amenity	1. Odour	N			
	2. Noise	N			
	3. Dust/fibres/particulates	C4		3.2.1;	
	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	1	Total compliance score (see section 5 for scoring scheme)	0.1
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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.

PB Gelatins UK Limited meeting - 5th November 2015

1. Update on site / issues / complaints
 2. Actions from CAR Forms
Dated 30th June 2015
Dated 4th Sept 2015
Odour abatement plan
 3. Complaints received to NRW and OMP
Liaison group
Odour mitigation
 4. Improvement condition update
IC4 – Pipework moved
IC5 – Tertiary bunding
IC6 – Hard standing
 5. ETP update
 6. EMS overview
 7. Site health and safety
 8. Site inspection
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Update on site / issues / complaints

This was the first meeting since June 2015. During the 2015 summer there have been a number of complaints in regard to odour generated from and around the A18 building. PB Gelatin provided an updated version of the '*Review into Environmental Issues at A18 Building*' that provides an overview of the measures to be implemented to reduce odour from the site.

Actions from CAR Forms

All actions generated through the CAR Forms, in regard to the A18 building, are captured in the PB Gelatin document '*Review into Environmental Issues at A18 Building*'. This CAR Form confirms the completion of the following actions:

CAR Form following visit on the 30th June 2015

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.

ACTION: *In regard to spilling at the pumping station.* To combat this from happening again PB will fit an orifice plate into the effluent line to minimise flow to break tank.

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.

These have all now been completed.

CAR Form following visit on the 1st September 2015

ACTION: PB Gelatins to update the sites EMS with regard to the maintenance of the balance tank pump and any other associated mechanisms that may lead to an odour release and, or, any other release to the environment that may have a negative impact.

Evidence provided for the SOP Procedure (Standard Operating Procedure) for the daily DAF checks referenced

ACTION: PB Gelatin to put in place a 'warning' e-mail alert to the local businesses and relevant parties when there is to be a knowable or planned odour release.

These have all now been completed.

Odour abatement plan

The '*Review into Environmental Issues at A18 Building*' is kept under review by PB Gelatins. The current version is Review 3. There are a few outstanding actions, these are:

- A4 – Regarding the wet scrubber – to be completed by 30th January 2016
- A6 – Regarding the rotary screen - to be completed by 30th January 2016
- A9 – Regarding angled plates in the rotary screen - to be completed by 30th January 2016
- A17 – Regarding SOP for cleaning balance tank - to be completed by 30th November 2015

Complaints received

Since the last CAR Form there has been one complaint received by NRW. This was on the 24th September 2015. This complaint was not substantiated by NRW but was investigated by PB Gelatins in line with their odour management plan. When undertaking the odour checks PB Gelatins could not detect an odour apart from a faint odour close to the bone skip.

Two complaints were received directly to PB Gelatins, one on the 22nd September that was not detectable by PB Gelatin following their investigation. The other was on the 8th October and was reported from the Petwise shop. PB Gelatin visited Petwise to discuss the complaint and have concluded that this might be from the cleaning of the sludge tank. This activity is undertaken on a Sunday to avoid disruption. PB Gelatins are now looking into this and will re schedule the cleaning activity accordingly. PB Gelatin has also added Severn Road to their odour monitoring plan.

Complaints received to NRW and OMP

Liaison group

PB Gelatin are planning the next liaison group meeting in January 2016. PB Gelatin propose to use this as an opportunity to demonstrate the new scrubber equipment as well as talking through the completion of the outstanding improvement conditions.

PB Gelatin also supplied the N-Virocycle work instruction for the loading of liquid waste from the sludge tank. This reiterates the necessity to hook the tanker to the scrubber unit before they start to load. A poster is also displayed in the loading area.

Improvement condition update

The outstanding improvement conditions are:

- b. IC4 – Pipework moved (Deadline 30th Sept 2015. Extended to the 30th December)

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)

These will be completed during the Christmas shut down.

ETP update

The ETP project is unlikely to proceed due to the proposed facility not having the capacity to process the amount of effluent produced. The size of the effluent treatment plant required would need more space than is currently available but would remain an option if the situation changes.

EMS overview

PB Gelatins have now had their permit for over a year and have been updating their Environmental Management System (EMS) during this period. The original EMS submitted was not specific enough and PB Gelatin are in the process of updating some of the procedures in line with comments made by NRW. PB Gelatins have confirmed that this should be finalised by the end of Quarter 1 2016. At this point NRW will be undertaking an audit of the EMS in line with condition 1.1.1 of their permit.

Site health and safety

NRWs health and safety visitor's sheet was reviewed by PB Gelatin to ensure all on site requirements are met by NRW when attending site.

Site inspection

A site inspection was undertaken with regard to the improvements made at A18. These included:

- Barrier erected by the sludge tank
- Start of the construction for the cover over the rotary screen. PB Gelatin also supplied drawing of the design that now would have permanent structure over the screen with a new staircase leading up. This will help monitoring on the rotary screen to be more frequent, safer and enable regular cleaning of the surfaces. The additional changes to the rotary screen will also limit the potential for bone to build up on the screen.
- Whilst undertaking the inspection no odour was detected at the scrubber emission point as well as no odour detected by the sludge tank and associated pipework.
- In response to complaints received directly to PB Gelatins a screening fabric has been put up to prevent dust blowing towards the car showroom next door to the lorry turning area. This is especially an issue during dry conditions when the dust is generated as the lorries enter the site and turn in preparation for unloading. PB Gelatins propose to tarmac this turning area to prevent the dust being generated and eliminate the impact on the showroom. This has not been enforced by NRW and it is reassuring to see PB Gelatins being proactive in response to complaints received.
- During the site inspection a spill of bone was noted in the turning area near some of the exit doors to the New Farm. It was not clear where these deposits were generated but PB Gelatin will investigate further and, if necessary, amend relevant procedures. **This has been considered as a Category 4 breach of condition 3.2.1 of the permit. The deposits were small and posed no risk the environment.**

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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			
F3	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.