

	EPR Compliance Assessment Report	Report ID: DP3030ZC/0223824			
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	23/10/2014		Time in	10:00	Out 16:00
What parts of the permit were assessed	Site meeting				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	Peter Abell				
Officer's name	David A Willey		Date issued	11/11/2014	

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	A			
	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	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	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	0	Total compliance score (see section 5 for scoring scheme)	0
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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: 23rd October 2014

Time: 10:00

Scope

1. Overview of NRW and introductions
2. The permit and its requirements
3. NRW's requirements
4. Odour complaints
5. Site tour / inspection
6. Actions

1. Overview of NRW and introductions

This was the first meeting with PB Gelatins UK Limited following their permit being issued on 10th October 2014. The purpose of the meeting was to provide PB Gelatins Ltd with an overview of NRW and what are the permit requirements.

PB Gelatins UK Ltd provided the following contact details in relation to the permit and its compliance:

Mark Evans – General Manager
Alan Fitzpatrick – Health and Safety
Peter Abell – Operations Manager
Neil Davies – Engineering Manager
Gareth Palmer – Consultant

2. The permit and its requirements

The requirements of the permit were discussed in detail through a presentation with an emphasis placed on the improvement conditions.

All reporting forms, Schedule 5 Notifications and reports should be submitted to Natural Resources Wales South East Area team addressed to Liz Parr
elizabeth.parr@naturalresourceswales.gov.uk and David Willey
david.willey@naturalresourceswales.gov.uk.

The 14 improvement conditions were discussed with the following improvement conditions raised as points of discussion.

Improvement condition 2 – An Odour Management Plan has been submitted (31st October 2014) and is in the process of being reviewed by NRW. PB confirmed that Alan Fitzpatrick should be the point of contact for any odour complaints that come in from members of the public.

Improvement condition 6 – The requirements of improvement condition 6 were discussed with NRW to confirm the specification to be met for the bunding. NRW can confirm that the requirements of CIRIA 736 should be met. CIRIA 736 list the requirements for bunding for different uses.

Improvement condition 7 – PB Gelatins has fitted an activated carbon scrubber to assist in the removal of mercaptans from displaced air during unloading of the sludge to tanker.

Improvement condition 7 has been completed.

Improvement condition 9 – The requirements of improvement condition 9 were discussed. PB talked through the process in place and appeared to be in line with the best available techniques. NRW agreed to send the relevant sector guidance note for PB to use in response to this condition.

Improvement condition 11 – Extension agreed from 30th October to the 13th November 2014.

PB Gelatins confirmed that the drainage plan dated 20/09/2013 is the correct plan to be used and not the one referenced in the permit in Schedule 7 dated 21/12/2011.

3. NRW's requirements

Additional requirements of holding a permit are to display the permit number and details of who to contact in regards to the permit. This is listed in the document *How to comply with your environmental permit*. The requirements are to display a notice at or near the site entrance telling the public about the nature of the site and who they can contact for further information or who to notify if they have a concern. It needs to be easily readable from outside the site in daylight hours and must include:

- the permit holder's name (company name at least)
- the operator's name - if different (company name at least)
- an emergency contact name and the operator's telephone number
- a statement that the site is permitted by Natural Resources Wales
- the permit number
- Natural Resources Wales national numbers, 0800 807060 (incident hotline), (or any other number we subsequently notify you about in writing).

Action: Could PB Gelatins Limited please provide a complete copy of the EMS to NRW. Electronic version preferable.

Action: Could PB Gelatins Limited please provide details of the contact of the energy plant operated by Dalkia.

4. Odour complaints

Since the site has had a permit there have been three complaints referenced:

22/10/14 11:34 The complainant says that there is a strong lingering smell, which is stagnant and stale. He thinks it comes from 'offloading of carcasses from an articulated lorry'. 01288729

24/10/14 08:30 PB Gelatines - Are offloading arctic trucks of what is assumed as bone into a holding room or tank in the ground. This is happening daily and giving off a terrible odour 01289150

28/10/14 07:14 PB Gelatins who are a nearby unit are currently emptying arctic trucks in their yard and there is a terrible stagnant smell in the air. The reporter believes that the trucks are the ones that import the bone. They are sign written L Transport. 01283479

These have been recorded by NRW and are in the process of being resolved as part of the odour management plan. The odour management plan is currently with NRW pending approval.

5. Site tour

A site tour was conducted following the process from receipt of Oessin to final packaging of gelatine ready for export. PB described the odour abatement equipment installed to control the displaced air from the tanker and sludge container. Other sources of odour were discussed and will form part of the odour management plan for the site.

Action: Could PB Gelatins Limited please install a barrier between the sludge tanker and road that will offer protection from any onsite traffic.

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Operator/ Permit	PB Gelatins UK Limited	Date	23/10/2014

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			

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.