

Natural Resources Wales permitting decisions

Bespoke permit

We have decided to grant the permit for PB Gelatins operated by PB Gelatins UK Limited.

The permit number is EPR/DP3030ZC.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Structure of this document

- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation and web publicising responses

Key issues of the decision

The original application included a part of the proposed installation referred to as the Dalkia Zone. On investigation it was discovered that this "zone" is operated by a different operator, namely Dalkia Utilities Services PLC.

Therefore this zone has been excluded from the permit, pending a separate permit for that zone.

Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/ notice.

Aspect considered	Justification / Detail	Criteria met
		Yes
Consultation		
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.	✓
Responses to consultation and web publicising	The consultation and web publicising responses (Annex 2) were taken into account in the decision. The decision was taken in accordance with our guidance.	✓
Operator		
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.	✓
European Directives		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓
The site		
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility The installation is split between three areas: • Old Farm and New Farm which is the liming area; • the production and blending area which also incorporates the waterworks and boilers; and • a small effluent plant area to the south of Gwaelod-Y-Garth Road. In addition, the installation includes the underground effluent pipes which connect the different areas described above. A plan is included in Schedule 7 of the permit and the operator is required to carry on the permitted activities within the site boundary.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Site condition report	The operator has provided a description of the condition of the site. We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports – guidance and templates (H5). An assessment of the Site Condition Report concluded that because historical contamination is present (the site has been in operation since 1937) the collection of background data to ascertain baseline data now may be appropriate for the Operator.	✓
Environmental Risk Assessment and operating techniques		
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The operator's risk assessment is satisfactory.	✓
Operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. The proposed techniques are satisfactory, with the exception of a few specific aspects. These aspects are the subject of specific improvement conditions. This approach has been taken due to the fact that this site is presently operational and has been operational for many years. and we consider them to represent appropriate techniques for the facility.	✓
The permit conditions		
Raw materials	We have specified limits and controls on the use of raw materials and fuels. The permit specifies that Ossein in animal bone only is to be accepted.	✓
Improvement conditions	Based on the information on the application, we consider that we need to impose improvement conditions. Due to the fact that the site is already operating and this permit is bringing the site into compliance, it has been necessary to include a series of improvement conditions. These conditions have been generated through a	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	thorough review of the infrastructure and operating techniques on site. The process included Notices from Natural Resources Wales that required the operator to assess the site in comparison to industry Best Available Techniques. The reports of the assessments were then reviewed and the improvement conditions drafted. We have imposed improvement conditions to ensure that: ➤ appropriate management systems and management structures are in place and that sufficient financial, technical and manpower resources are available to the operator to ensure compliance with all the permit conditions. ➤ appropriate measures are in place to ensure that accidents that may cause pollution are minimised. ➤ the appropriate measures are in place to prevent fugitive emissions. ➤ the appropriate measures are in place to prevent pollution from odour.	
Monitoring	We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. These monitoring requirements have been imposed for process monitoring only, in order to demonstrate that the processes are operating satisfactorily.	✓
Reporting	We have specified reporting in the permit. We have specified production and performance reporting on an annual basis for recording performance.	✓
Operator Competence		
Environment management system	There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.	✓
Relevant convictions	The National Enforcement Database has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Financial provision	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.	✓

Annex 2: Consultation and web publicising responses

Summary of responses to consultation and web publication and the way in which we have taken these into account in the determination process.
(Newspaper advertising is only carried out for certain application types, in line with our guidance.)

Response received from
Cwm Taff Health Board (Received 15 th August 2013)
Brief summary of issues raised
Concerns over odour from on-site activities given the perceived association between odour and ill health. Specifically emissions from the gelatine powdering exhaust, storage of liquids in bunded locations, waste storage, and seeking ISO4001 management system.
Summary of actions taken or show how this has been covered
The permit includes the standard conditions requiring: control of odour, emissions, operating techniques and written management systems. In addition specific improvement conditions have been included to require an improved odour management plan, and a review of all storage and bunding.

Response received from
Rhondda Cynon Taff Public Health and Protection (Received 22 nd August 2013)
Brief summary of issues raised
Have witnessed odour nuisance from the site on many occasions.
Summary of actions taken or show how this has been covered
As well as the standard odour permit conditions, the permit also includes a number of improvement conditions specifically targeted at resolving odour issues.

Response received from
Health and Safety Executive
Brief summary of issues raised
None – A copy of the application was forwarded to the Health and Safety Executive on 5 th August 2013. A reminder letter was sent on 5 th September 2013. No response has been received.
Summary of actions taken or show how this has been covered
None

Response received from
Food Standards Agency
Brief summary of issues raised
None – A copy of the application was forwarded to the Food Standards Agency on 5 th August 2013. A reminder letter was sent on 5 th September 2013. No response has been received.
Summary of actions taken or show how this has been covered
None

Response received from
Health Protection Agency
Brief summary of issues raised
None – A copy of the application was forwarded to the Health Protection Agency on 5 th August 2013. A reminder letter was sent on 5 th September 2013. No response has been received.
Summary of actions taken or show how this has been covered
None

Response received from
Welsh Water Dŵr Cymru
Brief summary of issues raised
None – A copy of the application was forwarded to Welsh Water PLC on 5 th August 2013. An email was received on 13 th September 2013 saying they had received and reviewed the application information and have no comments.
Summary of actions taken or show how this has been covered
None

Response received from
Public Consultation
Brief summary of issues raised
None – There have been no responses to the advertisement on our website.
Summary of actions taken or show how this has been covered
None.