

Compliance Assessment Report CAR_NRW0039236

Permit being assessed: BB3097ZS.

For: PB Gelatins, held by Veolia Energy & Utility Services UK PLC

At: P B Gelatins, Unit A6, Severn Road, Treforest Industrial Estate, Pontypridd, Rhondda Cynon Taf, CF37 5SQ.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 31/12/2021.

Parts of permit assessed: Monitoring Returns

NRW Lead Officer: Geraint Harris.

Report sent to: Jonathan Barwick, Contracts Manager on 31/01/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
H1 - Resource Efficiency - Efficient use of raw materials	Action only (X)	
H2 - Resource Efficiency - Energy efficiency	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
H1	Replace faulty steam meter on boiler 1	28/02/2022
H2	Review how energy, water and raw materials are recorded and investigate if and how a more accurate method can be incorporated for each sector.	31/03/2022

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Veolia Energy & Utility Services UK PLC

EPR/BB3097ZS.

Air Emissions

NRW received the annual returns for the boiler house at PB Leiners, operated by Veolia Energy & Utility Services UK PLC. The three boilers were monitored for NOx and Carbon Monoxide. There are no limits for these boilers, however as a guide the results were compared to the MCP ELV's and were well within their limits.

Energy Usage

Due to a failure on their client's steam meter for Boiler no.1 during June 2021, Veolia had to make a number of calculations based on three years of past data, to ascertain a mean gross efficiency of the plant of 93.37%. Using this figure coupled with the gas consumption of 6,813,147m³ they were able to estimate a steam generation of 89,700,810.77 Kg. Furthermore, they were able to calculate the conversion of feedwater to steam as 85.40% a slight improvement on the previous year. However, the caveat being that these figures are interpreted from past data and not a complete representation for the year.

Gas consumption for the period of 6,813,147m³ represents a decrease of 3.17% over the previous year. However, a mobile boiler utilising gas oil was employed at the site for the period 27/07/21 through 08/12/2021. This was due to the failure of the control system on site boiler No.2 and extensive maintenance shutdowns on both site boiler No.1 and site boiler No.3 consecutively. The site therefore consumed 74,188MWh of Natural Gas and 238,084 litres of BS2869, Class A2, gasoil, representing an additional energy consumption of 2,602MWh. Therefore, in total 76,790MWh of energy was consumed in 2021.

The recorded feedwater meter readings (combined for all 3 boilers) of 105,037m³ also represents a decrease of 4.15% over the previous year, however, It is not possible for Veolia to determine the exact 'raw' water usage of the boiler plant due to the mechanism by which their client supplies the boiler house; i.e., that their client supplies them with softened water which is mixed with condensate and returned via the condensate return vessel. This supply to the boiler house is metered by the client, however, this meter has also suffered a failure in 2021 and has only recorded 91,385m³ against Veolia's boiler feedwater meters' recorded 105,037m³.

year	Total metered Water	Total MWh	MWh per m ³ of Water
2021	105,037	76,790	0.73107572
2020	109,586	76618	0.69915865
2019	98,356	70124	0.71296108

Using Veolia's own water meter and the total amount of energy used for that year it appears that 2021 was the least efficient. However, part of the reason for this may be due to the installation of a temporary boiler which utilised gasoil rather than natural gas.

For 2021 it can be seen a number of assumptions were made to try to provide an overview of the site's

performance. However, it is a requirement of the permit to take appropriate measures to ensure that raw materials, water and energy are used efficiently in the sites activities and to maintain records of raw materials and water used in these activities. Therefore, it is essential that the steam meter for Boiler no.1 is replaced and maintained as soon as possible.

Action 1: Repair or replace boiler no.1 steam meter. **Due 28th February 2022.**

Action 2: Review how energy, water and raw materials are recorded and investigate if and how a more accurate method can be incorporated for each sector. For example, the installation of additional flow metres on the water supply lines. So a better interpretation can be made of water use and water efficiency.

Due 31st March 2022.

END.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.