

Compliance Assessment Report

Report ID:
CAR_NRW0026831

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					
Regime	Installations					
Date of assessment	21/12/2016	Time in	10:00	Out	13:00	
Assessment type	Audit					
Parts of the permit assessed	EMS					
Lead officer's name	Willey, David					
Accompanied by						
Recipient's name/position	Alan Fitzpatrick/ Safety Officer	Date issued	06/01/2017			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). 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	CCS Category	Condition(s) breached
E2 - Emissions - Land and groundwater	C3	3.1.1

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	4
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If the Number of breaches recorded is greater than zero, please see Section 3 for 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 (eg. 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 advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

PB Gelatins CAR Form following site visit on 21st December 2016

The following actions have now been completed:

ACTION: PB Gelatin to investigate and propose techniques to ensure that foam is not generated as it enters the Welsh Water chamber.

This has now been completed, this is discussed later in the CAR Form.

ACTION: PB Gelatins to update their drainage plan in light of the recent event and undertake an investigation of other potential historic drains on their land.

This was received on 21st December 2016.

ACTION: PB Gelatins to ensure all IBCs / barrels containing chemicals and raw materials are stored in appropriately bunded area.

This has now been completed, this is discussed later in the CAR Form.

ACTION: PB Gelatins to confirm when the sludge tank was last cleaned and confirm the procedures in place for the cleaning of the sludge tank.

These have now been developed and put in place.

ACTION: PB Gelatins to confirm the inspection / maintenance procedures in place for the filter associated with the sludge tank. (White filter located next to sludge tank.)

The filter identified is an old filter that was used for the sludge tank but is now used on the air intake to the sludge tank.

ACTION: PB Gelatins to investigate this release and the associated increase in temperature of the effluent and in the odour release.

This was in regard to the discharge leaving the Old Farm. This has been confirmed as being under normal operating conditions.

ACTION: PB Gelatins to ensure the rotary screen is washed down regularly to avoid the build-up of sludge on the screen and the potential to generate odour.

This has now been completed and is being tracked by PB Gelatins.

ACTION: PB Gelatins to incorporate regular cleaning of the balance tank into the sites EMS to avoid the potential for odorous releases from the balance tank. PB Gelatins to continue to actively contact local business when carrying out these cleaning activities.

This has been completed and incorporated into the sites EMS.

Previous actions from CAR Forms carried forward:

ACTION: PB Gelatins to provide the results of the drain survey to NRW to ensure that all drains have been identified in that area of the site.

ACTION: PB Gelatins to provide copies, and any associated updates, to NRW for the EMS documents referred to in the CAR Form issued on 15th December 2016.

ACTION: PB Gelatins to review the checks in place for the pumps.

ACTION: PB Gelatins to provide a Standard Operating Procedure (SOP) for the inspection of the non-return valve to ensure it is in good working order.

ACTION: PB Gelatins to ensure staff are fully trained on the requirements of the sites EMS (and associated procedures), the requirements of the EPR permit and to appreciate the significance of their roles in complying with the conditions of the environmental permit.

To be rolled out in Q1 2017.

ACTION: PB Gelatins to evaluate setting a constant or zero flow rate alarm if values remains constant (protection if level control fail making pump non-operational).

PB Gelatins to confirm whether they will be going ahead with this alarm.

ACTION: PB Gelatins identified the possibility of receiving SCADA alarms on pager / phone. NRW see this as an important step to ensuring immediate response to rising sump levels.

PB Gelatins are in the process of checking whether their version of SCADA is able to perform this function.

ACTION: PB Gelatins to update the sites emergency preparedness and response plan / accident management plan with a company alarm strategy that includes a clearer definition and purpose for the sites alarms with associated training and reviews. This will include formal audits and reviews to ensure tighter quality control.

ACTION: PB Gelatins to undertake integrity testing of the effluent pumping station investigating worst case scenarios and implementing associated procedures within the EMS

ACTION: PB Gelatins to clean the pipework that feed the effluent discharge. Cleaning of the pipework should be replicated to other areas of the Old Farm as part of good housekeeping and to ensure clear running of the effluent. This should also form part of the sites EMS.

Site inspection 21st December 2016

A site inspection was carried out of the culvert work undertaken and other improvements made on site. Previously IBCs and barrels were stored in an unbunded area. Now a newly installed container has been purchased and can house up to twelve IBCs and / or barrels. PB Gelatins will be installing tertiary drainage in front of the container in case of any spillages that may occur. This would then drain to the sites internal drainage system. This work will commence once the old drains have been dug out and replaced with new drains to the rear of A21.

Photo 1: Improved recycling area and IBC / drum storage



Other improvements made at the site in response to previous site visits and incidents include the redesign of the flow as it enters the Welsh Water sewer. The redesign reduces the amount of turbulence as it enters the chamber and therefore reduces the potential for foam generating. In addition to the works in the chamber there have been improvement made to the flow from the Old Farm where previously there was a step of about 300mm that reduced the velocity of the flow and potentially led to a build-up of material and odour. Additional inspection will be put in place by PB Gelatins to ensure a good flow.

Photo 2: Newly installed drains to improve flow and avoid stagnant pools



A new anti-foaming dosing system has also been put in place that doses using a spray method that enables better mixing prior to entering the DAF plant.

Photo 3: E9 chamber following improvement work



During the visit civil contractors had just completed work on the E9 chamber following subsidence on the WJEC site. The chamber had been covered with patio slabs with no access to the chamber. On the 13th December 2016 PB Gelatins received a phone call from WJEC reporting the subsidence. PB Gelatins confirmed that there was no effluent evident in the surface water outfall to the River Taff. On visiting the site on the 21st December 2016 the civils contractor described the work they had carried out to rectify the chamber and ensure that the eroded brickwork has been replaced with a more suitable material.

The effluent as it leaves the Old Farm enters E9 at a right angle and this has led to erosion of the original brickwork over time eroded away vertically resulting in the subsidence. NRW were advised that the surrounding ground was predominantly clay and acted as a barrier for the effluent from entering the groundwater, this would have aided the vertical erosion that occurred.

The absence of inspections and maintenance at this chamber has led to the unauthorised discharge to groundwater. **This has been considered as a category 3 breach of permit condition 3.1.1 where the impact is localised around the point of discharge and the pollution is unlikely to spread within the geological strata.**

ACTION: Access to chambers E9 and E8 on the WJEC site to be put in place with suitable access points.

ACTION: SOPs to be put in place for the inspection of all the chambers to ensure there is no deterioration in their integrity

Permit variation

PB Gelatins informed NRW that Veolia are in the process of putting together the permit variation for the combustion plant to be incorporated into the sites permit as a directly associated activity.

Odour investigations

PB Gelatins have undertaken a number of preventative measures for odour generation and are in the process of putting together a number of SOP to ensure the potential for odour generation is prevented. One of the more recent investigations has identified the balance tank as being a source of odour and since cleaning the balance tank there have been no complaints received. PB Gelatins propose to drain the balance tank every three months to check for the build-up of solids that will determine whether a full clean is required. In addition there will be an annual clean of the tank.

In addition the dosing of Hydrogen peroxide has been temporarily installed within the Old Farm. A more permanent set up is proposed once an understanding of the required dosing is obtained.

END

EPR Compliance Assessment Report

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Site	PB Gelatins EPR/DP3030ZC	Permit Ref	DP3030ZC
Operator/Permit holder	PB Gelatins UK Limited	Date	21/12/2016

Section 3 – Enforcement Response

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.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
E2	C3	Access to chambers E9 and E8 on the WJEC site to be put in place with suitable access points. SOPs to be put in place for the inspection of all the chambers to ensure there is no deterioration in the integrity	28/02/2017

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 verbally or 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 that 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 fulfil 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 (eg. 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 its service
- Freedom of Information Act/Environmental 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 fifteen 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 officer's line managers using the informal appeals procedure. 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.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.