



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ms Alana Corbett
SCA Hygiene Products UK Ltd
Oakenholt Mill
Oakenholt
Flint
Flintshire
CH6 5PU

Ein cyf / Our ref: BV3715IL
Eich cyf / Your ref:

Dyddiad/Date: 06 October 2014

Dear Ms Corbett

**Environmental Permitting (England and Wales) Regulations 2010
Operator Monitoring Assessment**

I enclose the audit report and compliance assessment report for the recent audit of your water emissions monitoring. You will see that since the audit we have assessed one of the critical elements as non-compliant. This is because we didn't feel that there was sufficient evidence to demonstrate that some of the methods used, both in-house and by the external lab, are compliant with M18. The methods of concern are for COD, Total Nitrogen, Total Phosphorus and Metals. The requirement to use M18 compliant methods should be part of the agreement with the contract lab and they should be able to demonstrate to you that they meet these standards. The method used on site for COD analysis should be referenced back to the standard it is based on, and include any quality control checks.

These aspects should be addressed as a priority to ensure that your monitoring is compliant with your permit.

A number of other recommendations have been made to improve the robustness of your monitoring. Many aspects currently work well, but rely on certain individuals with good knowledge of the permit requirements. Written procedures within the site EMS will ensure that the permit conditions can be met, whoever has the responsibility.

Yours sincerely

Alison Soper
Regulatory Officer PPC/RSR

Epost/Email alison.soper@cyfoethnaturiolcymru.gov.uk
Ffôn/Tel 01244 894595

www.cyfoethnaturiolcymru.gov.uk

Chester Road, Buckley, Flintshire CH7 3AJ

www.naturalresourceswales.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

file copy