

Compliance Assessment Report

Report ID:
CAR_NRW0024814

This form will report compliance with your permit as determined by an NRW officer

Site	Oakenholt Mill EPR/BJ9681IX	Permit Ref	BJ9681IX		
Operator/Permit holder	SCA Hygiene Products UK Limited				
Regime	Installations				
Date of assessment	02/12/2016	Time in	N/A	Out	N/A
Assessment type	Site Inspection				
Parts of the permit assessed	All Below				
Lead officer's name	Ellis, Rhys				
Accompanied by					
Recipient's name/position	Mike King/ Environmental Advisor	Date issued	22/02/2018		

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
E3 - Emissions - Surface water	C3	3.1.2

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
------------------------------------	---	---	---

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

E3) Emissions surface water.

Thank you for submitting reporting of emissions to water (other than to sewer) and land, and completing the performance indicators for the period 01/07/2016 to 31/09/2016.

Permit condition 3.1.2 stipulates that the limits given in Schedule 3 shall not be exceeded.

Breaches of limits in regards to suspended solids and biological oxygen demand have been noted and temperature reached the limit of 25°C on the 05/09/2016.

Substance / Parameter	Emission Limit value	Result	Date
Suspended Solids	50mg/l	83mg/l	10/07/2016
Biological Oxygen Demand (BOD)	50mg/l	94mg/l	20/09/2016
Temperature	25°C	25°C	05/09/2016

A schedule 5 Part A was received for Suspended solids exceedance (83 and 59ppm) and reference was made to spill of blue dye on site which entered the ETP. This was briefly discussed in the last CAR form sent to you.

A part B notification has subsequently been received explaining measures taken which will be discussed further below.

A schedule 5 Part A and B was received for the BOD limit exceedance. In summary your response stipulates that as a result of this breach the plant growth in primary settlement tank has been removed, but the site believe a more thorough clean is required and that you are in the process of obtaining quotations for this work

ACTION A – Please can the site confirm if this thorough cleaning work has been undertaken and what it entailed and confirm if this has had a positive effect on the biological oxygen demand results?

As there has been a limit exceedance related to a permitted discharge to surface water (mainly biological oxygen demand and suspended solids) that could foreseeably result in pollution, a CCS breach of 3 has been noted against permit condition 3.1.2 under emissions to water criteria.

Breach of limits have also been recorded on other occasions for the period 01/07/2016 to 31/09/2016 which is explained below. However these will be consolidated with the above breach.

G4) Monitoring and records, maintenance and reporting. Reporting and Notification.

Other schedule 5 notifications received during quarter 3.

10th August 2016 Schedule 5 reported a BOD exceedance of 55mg/l over 50mg/l permit limit. Schedule 5 Part B was received explaining that you believe plant growth in primary settlement tank has contributed to this high result, and that plant growth had been removed. Please refer to Action A above.

19th October 2016. Please note this CAR Form only refers to emission reporting for quarter 3. However on receipt of one Schedule 5 notification received by NRW for the 19th October 2016 it highlights dates of any unauthorised emissions from the facility in the preceding 24 months.

Amongst the dates quoted are 19/08/16. Natural Resources Wales have not received any Part A or B for any exceedances for this specific date. Please can site investigate and submit the relevant schedule 5 as soon as possible.

Effluent Treatment Plan (ETP) and responses to previous CAR Forms

As exceedances of emission limit value are still occurring it would be useful if you could provide an update on the development of the Effluent Treatment Plan (ETP). You have previously discussed the potential of installing a primary settlement at the ETP and in your recent response (Action 3 of CAR reference CAR_NRW0024820) you advised that TG1 of the CAPEX request has been submitted and approved and that TG2 of the CAPEX is currently being worked on, and will be submitted in October for approval.

ACTION B. Please could you provide an update on this?. Please could you also clarify what is meant by TG1 AND TG2.

Uncontrolled discharges to the ETP

It was encouraging to see that **Action 2** of CAR reference CAR_NRW0024820 highlighted actions the site have taken to avoid similar incidents of uncontrolled discharges to the ETP, including measures taken to avoid similar breaches of permit conditions. As a response to this you advised that you have:

- Introduced spills monthly training topic- Document attached in your response
- Awareness campaign delivered – Document was attached in your response
- Test paper delivered to shift employees – an example was attached in your response
- Part B completed

Please can the site ensure that the appropriate training records/programmes and relevant EMS Sections are updated to reflect these changes.

In the Spill Training 2016 it refers to site improvement. The training quotes- '*Permanent divert to be placed onto the drain. Divert into PM2 basement then onwards to be treated through effluent treatment plant*'

ACTION C – Please could the site provide a detailed information on this improvement including timescales. Does this mean that in the event of a spillage- the basement would act as a containment measure, preventing any spills to the ETP?

Raw data for suspended solids

Thank you also for submitting the graph for raw data for suspended solids as a response to action 4 of CAR reference CAR_NRW0024820

Improvement conditions responses.

Natural Resources Wales responded separately on the 23/11/2016 in regards to your improvement conditions responses.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0024814**

This form will report compliance with your permit as determined by an NRW officer

Site	Oakenholt Mill EPR/BJ9681X	Permit Ref	BJ9681X
Operator/Permit holder	SCA Hygiene Products UK Limited	Date	02/12/2016

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.

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.

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			
E3	C3	Stop breaching limits and provide an update in regards to the development of the ETP	09/01/2017

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.