

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

Site	OAKENHOLT MILL	Permit Ref	BV3715IL		
Operator/ Permit holder	SCA Hygiene Products UK Limited				
Date	11/09/2013	Time in	10:00	Out	13:00
What parts of the permit were assessed	Effluent plant improvements, noise management, general operations				
Assessment	Site Inspection	EPR Activity	Installation	X	Waste Op
Recipient's name/position	Alana Corbett				
Officer's name	Alison Soper	Date issued	17/09/2013		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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

Condition(s) breached

Permit Conditions and Compliance Summary	Condition(s) breached
a) Permitted activities	
1. Specified by permit	A
b) Infrastructure	
1. Engineering for prevention & control of pollution	N
2. Closure & decommissioning	N
3. Site drainage engineering (clean & foul)	N
4. Containment of stored materials	A
5. Plant and equipment	A
c) General management	
1. Staff competency/ training	N
2. Management system & operating procedures	A
3. Materials acceptance	NA
4. Storage handling, labelling, segregation	N
d) Incident management	
1. Site security	A
2. Accident, emergency & incident planning	N
e) Emissions	
1. Air	N
2. Land & Groundwater	NA
3. Surface water	A
4. Sewer	NA
5. Waste	A
f) Amenity	
1. Odour	A
2. Noise	C3
3. Dust/fibres/particulates	C4
4. Pests, birds & scavengers	NA
5. Deposits on road	NA
g) Monitoring and records, maintenance and reporting	
1. Monitoring of emissions & environment	A
2. Records of activity, site diary, journal & events	N
3. Maintenance records	N
4. Reporting & notification	A
h) Resource efficiency	
1. Efficient use of raw materials	N
2. Energy	N

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk), A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable

Number of breaches recorded	2	Total compliance score (see section 5 for scoring scheme)	4.1
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If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

INITIALS DATE
 OK FOR PUBLIC REGISTER JS 2/12/13
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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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and completed within 14 days of an assessment.

Noise - Breach of permit condition 3.4.1

Several complaints have been received in recent months about noise from the site. It appears to be from the main fan on the PM1 building. The noise was audible at the complainant's property as a steady whine; nearer the site it was very noticeable and could easily give rise to annoyance. SCA have checked the silencer and the motor to ensure that everything is working as it should, and are now proposing to add a section of ducting to the outlet to direct the sound downwards. The outlet from the fan is currently directed towards an empty water storage tank which may be resonating and adding to the problem off site.

Work is also planned to reduce the fire risk in the PM1 building roof space as it is excessively hot there. These two problems should be tackled together as the PM1 fan does not appear to be removing sufficient heat from the building and could be replaced with an alternative system which could also have the benefit of reducing energy consumption. Overall the use of the PM1 fan does not appear to meet the Permit requirements of using BAT.

General Management - Breach of permit condition 1.1.1

Most of the site was quite clean at the time of the visit, but some residue was observed at the sides of the entrance road where paper fibre had been washed down from the yard. Procedures should be reviewed to ensure that they prevent this from happening.

Observations:

- There was a minor leak of cooling water from the ETP heat exchanger. This was stopped before leaving site.
- An overflow from the fresh water feed to the pulper was also resulting in water running down the yard. This was described as being intermittent and had only recently been identified as due to a problem in the response time of the system controlling paper machine water return and fresh water input to the pulper. A solution was being worked on.
- The cleaning regime in PM2 has been changed since the last fire to try to reduce the amount of dry dust in the building. The machine is stopped weekly for a thorough clean, and accessible areas are cleaned regularly during shifts. The area under the winder is hosed down at every opportunity and the extraction around the reel cutting equipment has been improved. Longer term, methods of general dust extraction are being investigated.
- The chemical storage has been improved in the PM2 krofta building. Further racking is being constructed to store excess IBCs in segregated areas. As coloured tissue is no longer made on site all the dye chemicals are to be removed.
- The skip area was tidy, efforts are still being made to reduce the amount of general waste.
- A new boiler to replace one of the existing ones will be installed within the next six months. This will run as the primary boiler with the other remaining as standby. A reverse osmosis plant is also being built to treat reservoir water for the boilers.
- Back-up dewatering equipment has been installed to ensure that sludge going off site has a minimal water content. Landspreading is still considered to be the best disposal option, but others may be considered in the future.

Improvement Condition responses

A request was made to defer the reports for Improvement Conditions 3 and 5. Initial work has been done to assess the design and operation of the effluent plant in its current configuration and some recommendations have been made for improvement. The plant is more stable than in the past and exceedences happen less frequently, but it would be unlikely to meet the proposed BOD limit of 25mg/l consistently. Changes within the company have resulted in delays in capital projects, but it is expected that a decision will be made within the next six months.

ACTION - SCA to provide an update by the end of December on the status of progress against Improvement Conditions 3 and 5.

The report for IC 4 was received as required and meets the requirements of the condition.

Non-compliance record no. 202545



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Operator/ Permit	SCA Hygiene Products UK Limited	Date	11/09/2013

Section 3- Enforcement Response

Only one of the boxes below should be ticked

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

X

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.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
F2	C3	Complete proposed works to direct outlet downwards. Longer term, investigate whether the PM1 fan can be replaced with an alternative method for cooling the building.	N/A
F3	C4	Review procedures for cleaning yard areas to ensure tha fibre is not washed onto the entrance road.	N/A

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.

