

Compliance Assessment Report

Report ID:
CAR_NRW0031623

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	31/03/2017	Time in	09:00	Out	17:00
Assessment type	Report/Data Review				
Parts of the permit assessed	All Below				
Lead officer's name	Ellis, Rhys				
Accompanied by					
Recipient's name/position	Mike King/ Environment Leader	Date issued	16/05/2017		

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
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	

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	0	Total compliance score (see section 5 for scoring scheme)	0
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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

This report covers monitoring and notification for Quarter 1 (Jan to March 2017). It also discussed the outstanding improvement conditions and also issues noted with the current permit which was discussed on site in March 2017.

(G4) Reporting and notification to Natural Resources Wales

Thank you for submitting reporting of emissions to water (other than to sewer) and land, and completing the performance indicators for the period 01/01/2017 to 31/03/2017. Please note that the performance indicator report is an annual requirement.

No breaches against emission limit values were noted.

No Part A or B notifications were received from site for this quarter.

A meeting was also held on site this quarter to discuss inconsistency with the permit and progress in relation to the improvement conditions.

Permit issues

Permit errors were brought the operators attention and the necessary amendment required discussed with the operator to ensure that the permit is enforceable and most importantly the correct monitoring and reporting parameters are undertaken by the operator. As discussed please find an example of a resource efficiency report form as requested.

Queries in regards to how AOX needs to be incorporated into the permit has also been forwarded to our permitting department. Attached with this email is the summary of amendment required which was discussed with the operator. These have been forwarded to our permitting department

Improvement conditions

Improvement condition 6.

Permit condition 6 highlights that the operator shall complete a noise survey on the new PM2 dust extraction system once it has been installed, to compare actual results with modelled results included in the application and submit to NRW.

You previously advised that the installation of the above dust system was not completed until June 2016 and that you have not in actual fact started the system until July 2016.

You advised last year that you had some technical issues due to be resolved during September so should be running the system in during October at which time you will undertake the noise assessment's required in our revised permit.

ACTION 1 : This has now been outstanding condition for long period of time. Please can you provide a date of when this will be submitted.

Improvement condition 7.

You advised that as part of your annual effluent testing, you test for the majority of chemicals referenced in "Estuaries and coastal waters priority hazardous substances, priority substances and other pollutants". Subsequent results and analysis calculations find that with the exception of nickel, mercury, lead and cadmium there is no evidence of any of these pollutants being released into the estuary. On the occasions you have detected the substances stated above, they have been comfortably within their respective average and maximum limits including the annual loading limits.

You advised that you have been sourcing UKAS accredited laboratories, including National Laboratory Services, in order to cover all determinants listed and that you are looking to send off samples as soon as possible.

SCA will also look to do the same testing on the incoming fresh water for the purpose of understanding the chemical composition

of the process water you use.

Please note - Once all the above has been completed and all information collated NRW expects a detailed report detailing rationale for the substances assessed/not assessed, results from your H1 Assessment screening & sample analysis results. You did however advise that you are having difficulty analysing some of the determinants due to issues associated with limit of detection of the accredited laboratories. You advised that you would be contacting alternative laboratories, and if unsuccessful in finding alternative laboratories you will be forwarding the list of those determinants to NRW. It may be useful that for each of these determinant you provide a case of whether or not you believe they are present or not in the discharge. We will then access the best way forward with these.

ACTION 2: In the Interim please keep Natural Resources Wales updated on this matter.

Improvement condition 8.

Operator advised that they are in the process of sourcing an appropriate consultant to help in undertaking this work of producing site specific written protocol.

The deadline for this improvement condition was 30th September 2016. Although you replied to this condition the information provided was not sufficient. You have taken our comment on board and are currently sourcing a consultant to help undertake this work.

ACTION 3- Please confirm no later than 2nd June 2017 when you will be completing this improvement condition together with details of consultants appointed to do this work.

Improvement condition 9.

SCA have requested a copy of the original baseline report and as above will be using the sourced consultant to help in producing a report on the baseline conditions of soil and groundwater. The deadline for this improvement condition was 31st March 2016. Although you replied to this condition the information provided was not sufficient. You have taken our comment on board and are currently sourcing a consultant to help undertake this work.

ACTION 4- Please confirm no later than 2nd June 2017 when you will be completing this improvement condition together with details of consultants appointed to do this work.

Improvement condition 11.

You advised that some of raw materials used on site do contain AOX compounds including pulp, bleach and wet strength. SCA has in the past (2015) measured for AOX compounds and SCA still hold these records. SCA have now sourced a laboratory, ALS, who are able to test for AOX and we will commence the bimonthly testing in February 2017.

Improvement condition 12.

You advised that testing of ammonical nitrogen for the reservoir water commenced on the 18/01/17 and will take place once weekly. SCA are carrying out the tests externally using the same laboratory (Derwentside Environmental Testing Service) as is used for the effluent testing requested by your permit.

Data from the tests will be recorded on the effluent spreadsheet and the relevant procedure will be updated.

Improvement to the Effluent Treatment Plant

Natural Resources Wales would like to arrange a meeting to discuss the Effluent treatment plant this quarter. In the interim please could you confirm the capacity of the effluent treatment plant..

EPR Compliance Assessment Report

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Operator/Permit holder	SCA Hygiene Products UK Limited	Date	31/03/2017

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.

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.

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			

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.