

Compliance Assessment Report

Report ID:
CAR_NRW0032760

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	22/01/2018	Time in	N/A	Out	N/A
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	All Below				
Lead officer's name	Ellis, Rhys				
Accompanied by					
Recipient's name/position	Mike King/ Safety Specialist & Environment Leader	Date issued	12/03/2018		

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
E1 - Emissions - Air	X	
E3 - Emissions - Surface water	A	
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

E3) - Emissions surface water.

Thank you for submitting reporting of emissions to water (other than to sewer) and land, Reporting of emissions to air for the period from 01/07/2017 to 30/09/2017 and completing the performance indicators for the period 01/10/2017 to 31/12/2017.

ACTION 1 : The date stipulated in Air 1 attached with quarter 3 results states period from 01/04/2017 to 30/06/2017. Is this an administrative error, please could you confirm.

Please note that performance parameters are an annual requirement not quarterly.

A schedule 5 notification was received for August 11th 2017. Suspended solids internal tests showed 100mg/l against a permit limit of 50mg/l. The notification does stipulate that a full investigation will be carried out.

ACTION 2: Please could you forward a copy of the findings of this investigation by 6th April 2018.

Thank you for submitting reporting of emissions to water (other than to sewer) and land, and completing the performance indicators for the period 01/10/2017 to 31/12/2017.

Although the results for W2 are not recorded on your emissions reporting (May be linked to the confusion with the reporting forms which is highlighted in more detail below) you have confirmed that weekly monitoring is carried out on W2 sample point in line with the permit and that you measure for suspended solids and pH every week and that every month you sample for total hydrocarbons which is performed by DETS. In your permit the standard reporting form for W1 enclosed with your permit does not include the monitoring point W2 for reporting.

ACTION 3: Please can you send the W2 results no later than 6th April 2018 as required under permit condition S4.1 and S3.2. Inconsistency in regards to permit and reporting conditions have previously been highlighted in CAR forms and on-site visits. Amongst some of the inconsistencies are :

You are currently monitoring to what is defined in your table as Water Framework Directive dangerous substances and other plant protection substance screen, which does not appear to be listed in your current permit see table 3.2 of your permit which reference Priority Hazardous pollutants screen.

Monitoring at W1 should include the priority hazardous substances as defined in schedule 6 of your permit e.g Water Framework Directive Priority Hazardous Substances are Anthracene, Brominated diphenyl ether, Cadmium, C10-13 Chloroalkanes, Endosulphan, Hexachlorobenzene, Hexachlorobutadiene, Hexachloro-cyclohexane, Mercury and its compounds, Nonylphenol (4-Nonylphenol), Pentachlorobenzene, Polycyclic aromatic Hydrocarbons (PAHs), Tributyltin compounds (Tributyltin-cation).

ACTION 4 : Please update your monitoring schedule to reflect this.

Our permitting centre have been advised of these inaccuracies within the permit, however it would be prudent to have a confirmation from the operator first if the ETP upgrade involves a variation to the permit to avoid the submitting 2 separate variation applications.

ACTION 5: In the meantime please can the operator make note of these inaccuracies and amend notification procedures and monitoring regime to suit the correct requirements.

EPR Compliance Assessment Report

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Operator/Permit holder	SCA Hygiene Products UK Limited	Date	22/01/2018

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			
E1	X	see text in CAR Form	06/04/2018

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.