

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

Site	Intertissue Neath	Permit Ref	BU2489IT		
Operator/Permit holder	Intertissue Ltd				
Regime	Installations				
Date of assessment	10/05/2018	Time in	10:00	Out	15:00
Assessment type	Audit				
Parts of the permit assessed	See below				
Lead officer's name	Dunn, Karen				
Accompanied by					
Recipient's name/position	Kerry Mackinnon/ Environment Manager	Date issued	03/07/2018		

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
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
C2 - General Management - Management system and operating procedures	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	
H1 - Resource Efficiency - Efficient use of raw materials	A	
H2 - Resource Efficiency - Energy efficiency	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 was a pre-arranged visit and the company's representatives present were:

Kerry MacKinnon – Environment Manager

Rhiannon Wilcox – Environmental Assistant

- Discussion on proposed biomass plant – update on current project status;
- Advice and guidance concerning the agreed operating techniques table for the proposed biomass plant;
- Review of Pre-operation and improvement programme tables to establish timings for completion, confirm those completed as part of the permit variation and advise where necessary;
- 4th Anniversary of the publication (30.9.2014) of the official journal (30.9.2018) – Review of BATC document deadline;
- AOB – current initiatives lighting etc site tour to examine areas discussed.

Introduction and Overview

This was a routine NRW site audit of the Intertissue Ltd paper mill. The main objective was to review the pre-operational and improvements conditions programmes with the operator to provide advice and guidance where possible. The audit was pre-arranged, and an agenda was provided in advance. At the time of drafting the agenda the permitted biomass plant was in progress however just prior to the visit NRW was informed by the operator the project was on hold. The audit agenda continued as planned so advice and guidance could be shared with the operator should the project re-commence.



The visit began with discussions on current business matters. The operator advised that there has been a global increase in the price of virgin pulp which has had a knock-on effect on the price of their final product. The operator has carefully considered the process to optimise the efficient use of pulp because of this significant global change. Intertissue Ltd is part of the Sofidel Group who in recent years has invested in the UK with the purchase of a mill in both Lancaster and Leicester, the operator also has a standalone converting plant in Horwich. The current business strategy has meant that one of the converting lines (line 9) or 'Away from home' (larger jumbo kitchen rolls used away from the home and currently popular with the customer) was re-located to Intertissue from Horwich. Most recently Sofidel has invested in the US with two new greenfield integrated paper mills one in Ohio and a second modern mill in Louisiana. Sofidel has operated in the US since 2012 where the group has seen a rapid growth.

Locally at Intertissue Ltd current business has been good with capital investments being taken in line with the corporate strategy as part of the wider group. Such steps however have meant the re-consideration of larger investments at the site such as the biomass plant. The biomass plant is presently on hold to allow the business to focus on other investments within the group's portfolio. The timeline for the biomass plant is presently undefined.

Pre-operational and Improvement Condition

The main objective of this routine visit was the review of the pre-operational and improvement condition programme with the operator. Environmental permit condition 2.4 and 2.5 refers to the table of requirements in S1.4 and S1.3. For ease of reference the permit condition and associated tables have been replicated below.

<p>2.4 Improvement programme</p> <p>2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by Natural Resources Wales.</p> <p>2.4.2 Except in the case of an improvement which consists only of a submission to Natural Resources Wales, the operator shall notify Natural Resources Wales within 14 days of completion of each improvement.</p> <p>2.5 Pre-operational conditions</p> <p>2.5.1 Activity A5 in table S1.1 shall not be brought into operation until the measures specified in table S1.4 have been completed.</p>

All the pre-operational conditions (PO1 to 5) relate to the proposed biomass plant. On review KD provided advice where possible at this stage of the biomass plant project should it recommence. It would be prudent for the operator to go through and collate the associated agreed operating techniques ready for incorporation into the EMS. It will be important for the operator to consider the timeline for submission and approval of the PO measure prior to the biomass plant coming on line. During the assessment of the pre-operational conditions NRW will cross reference the submission to the measure to ensure that all requirements have been addressed prior to any approval. The measures were included based on the information provided in the variation application. In meeting the pre-operational measures, the operator will be confirming details proposed in the application. At a local level it was advised should the project reconvene the operator needs to familiarise themselves with the application submission.

Table S1.4 Pre-operation conditions	
Reference	Pre-operational measures
PO 1	At least two months prior to commencement of commissioning of the waste wood co-incineration plant referred to in activity A5 in table S1.1, the Operator shall provide a written commissioning plan, including timelines for completion, for approval by Natural Resources Wales. The commissioning plan shall include the expected emissions to the environment during the different stages of commissioning, the expected durations of commissioning activities and the actions taken to protect the environment and report to Natural Resources Wales in the event that actual emissions exceed expected emissions. Commissioning shall be carried out in accordance with the commissioning plan as approved
PO 2	At least two months prior to the commencement of commissioning of the waste wood co-incineration plant referred to in activity A5 in table S1.1, the Operator shall submit a written report to Natural Resources Wales which confirms and justifies the selection of the reagent to be used within the SNCR system. The report shall also include details of the procedures in place for the safe handling and management of the reagent and an assessment of the level of oxides of nitrogen and nitrous oxide emissions that can be achieved under optimum operating conditions
PO 3	At least three months prior to the commencement of commissioning of the waste wood co-incineration plant referred to in activity A5 in table S1.1, the Operator shall submit a written report to Natural Resources Wales which confirms whether or not flue gas recirculation (FGR) has been included in the final design of the plant. The report shall demonstrate how the chosen design will minimise the impact on the environment (including waste generated / raw material used)
PO 4	At least one month prior to the commencement of commissioning of the waste wood co-incineration plant referred to in activity A5 in table S1.1, the Operator shall submit a written report to Natural Resources Wales for approval a protocol for the sampling and testing of co-incinerator bottom ash for the purposes of assessing its hazard status. Sampling and testing shall be carried out in accordance with the protocol as approved
PO 5	After completion of furnace design and at least three calendar months before any furnace operation; the operator shall submit a written report to Natural Resources Wales of the details of the computational fluid dynamic (CFD) modelling. The report shall demonstrate whether the design combustion conditions comply with the residence time and temperature requirements as defined by the Industrial Emissions Directive.



Guidance relevant to the project includes the 'Specification for the Requirements and Test Methods for Processing Waste Wood'. In brief waste wood has been categorised by the Waste and Resources Action Programme (WRAP) in collaboration with the British Standards Institution (BSI) in PAS111:2012. The waste wood is categorised into grades A, B, C and D dependent on the chemical treatment, composition, physical condition and level of non-wood contamination. Further guidance to consider is EA RPS 207:

<https://www.gov.uk/government/publications/classifying-waste-wood-from-mixed-waste-wood-sources-rps-207/classifying-waste-wood-from-mixed-waste-wood-sources-rps-207>

The guidance can be found using the following link:

<http://www.wrap.org.uk/content/bsi-pas-111-processing-wood-waste>

Prior to the project going on hold the operator was investigating the potential source of the biomass fuel. PO4 refers to the 'submission of a protocol for NRW approval for the sampling and testing of co-incinerator bottom ash for the purpose of assessing its hazardous status'. The operator was referred to the Environmental Services Association (ESA) 'A Sampling and Testing Protocol to Assess the Status of Incinerator Bottom Ash' to help in the compilation of this PO measure:

http://www.esauk.org/esa_reports/20160224_ESA_IBA_Protocol_24_February_2016.pdf

Improvement Programme Requirements

The following conditions IC1 and IC2 were placed in the operator's environmental permit as part of the variation brought about through the publication of the revised best reference document (BREF). These improvement programme requirements (IC1 and IC2) are deemed complete (please refer to CAR-NRW0026659 & CAR-NRW0032934).

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	<p>If storing Priority Hazardous Substances on site, the Operator must carry out the following assessments with reference to the Environment Agency's guidance "How to carry out a risk assessment if you're applying for a bespoke permit that includes discharging hazardous pollutants to surface water".</p> <ul style="list-style-type: none"> Phase 1 Part A screening tests for mercury, cadmium, nickel, lead, benzene, polyaromatic hydrocarbons and any other relevant substances. Phase 1 Part B screening tests for mercury, cadmium, polyaromatic hydrocarbons and any other relevant priority hazardous substances. For any substance which is not screened out by the Phase 1 Part A or Part B screening tests the Operator will also need to carry out Phase 2 modelling, as described in "How to carry out a risk assessment if you're applying for a bespoke permit that includes discharging hazardous pollutants to surface water". <p>The Operator must provide Natural Resources Wales with the results of the emissions monitoring, the results from the screening tests and the results from any Phase 2 modelling. The Operator may use the Environment Agency's H1 electronic screening tool to present the emissions data and to carry out the Phase 1 screening tests.</p> <p>Note: With regard to the Phase 1 Part A screening - a full list of relevant substances is provided in the Environment Agency guidance "How to carry out a risk assessment if you're applying for a bespoke permit that includes discharging hazardous pollutants to surface water" under the section entitled "Screening test: priority hazardous pollutants". The Operator must review the list and carry out the screening for any substances, in addition to those specified above, that may be present in the installations discharges to surface water. With regard to the Phase 1 Part B screening for priority hazardous pollutants, the section entitled "Screening test: priority hazardous pollutants" provides a full list of relevant priority hazardous substances and their associated annual significant loads.</p>	30 th September 2016
IC2	<p>The Operator shall submit a report on the baseline conditions of soil and groundwater at the installation. The report shall contain the information necessary to determine the state of soil and groundwater contamination so as to make a quantified comparison with the state upon definitive cessation of activities provided for in Article 22(3) of the IED. The report shall contain information, supplementary to that already provided in the application Site Condition Report, needed to meet the information requirements of Article 22(2) of the IED.</p>	31 st March 2017



The remaining improvement programme requirements (IC3 to IC9) relate to the proposed biomass plant and were included in the variation for co-incineration. Again, for ease of reference the improvement conditions have been replicated in this CAR and were discussed prior to the on-site visit of the proposed location should the project reconvene. The photograph opposite was taken during the tour and shows the area proposed for the biomass plant. The plant is expected to be located to the east of the main building. The tanks in the photograph contain the clarified water used in the process.

IC3 is discussed in the decision document (DD) for the proposed biomass project, the operator advised that a copy of the DD was provided on issue of the permit variation, so a cross-reference can be made. It is expected that on any NRW acceptance of the report required by this condition it will form part of the operating techniques for the mill.

IC 3	<p>The Operator shall submit a written report to Natural Resources Wales for approval on the commissioning of the waste wood co-incineration plant referred to in activity A5 in table S1.1 on commissioning of the installation. The report shall summarise the environmental performance of the plant as installed against the design parameters set out in variation application PAN-000045 (Variation number EPR/BU2489IT/V009). The report shall also include a review of the performance of the facility against the conditions of the permit and details of procedures developed during commissioning for achieving and demonstrating compliance with permit conditions.</p>	<p>Within four months of commissioning of the waste wood co-incineration plant</p>
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In respect of IC 4 and similarly in line with the pre-operational conditions it is advised that the operator reviews the agreed operating techniques outlined in 'Table S1.2 'linked to condition 2.3.1 of the environmental permit. The techniques can then be cross referenced for incorporation within the EMS (please refer to the paragraph below concerning the certified EMS).

IC 4	The Operator shall submit a written report to Natural Resources Wales that demonstrates that the operation of the waste wood co-incineration plant referred to in activity A5 in table S1.1 has been incorporated in its Environmental Management System.	Within six months of commissioning of the waste wood co-incineration plant
IC 5	With reference to the waste wood co-incineration plant referred to in activity A5 in table S1.1, the Operator shall submit a written report to Natural Resources Wales which presents the results of calibration and verification testing to confirm that the performance of Continuous Emissions Monitors for parameters as specified within tables S3.1 complies with the requirements of BS EN 14181 (specifically the requirements of QAL1, QAL2 and QAL3)	Initial calibration report to be submitted to Natural Resources Wales within three months of completion of commissioning Full summary of evidence compliance report to be submitted within 18 months of commissioning

Regarding IC5 KD advised of the ‘working draft reference document’ which outlines best practice concerning the monitoring of emissions to air and water. It was considered that this document would help as a knowledge base in advance of the proposed biomass project.



The aim of the document is to inform the competent authorities and operators of the general aspects of the monitoring of emissions from installations under the scope of the Industrial Emissions Directive (IED 2010/75/EU).

This document can be found on the European Commission website via the following link: <http://eippcb.jrc.ec.europa.eu/reference/mon.html>

IC 7 is a standard condition which is outlined in current environmental permit templates in England and Wales. It is also discussed in brief in the DD and the following guidance can also help in respect of the monitoring of PM₁₀ and PM_{2.5}.

<http://naturalresources.wales/media/2126/technical-guidance-note-m15-monitoring-monitoring-pm10-and-pm25.pdf>

IC 6	With reference to the waste wood co-incineration plant referred to in activity A5 in table S1.1, the Operator shall carry out checks to verify the residence time, minimum temperature and oxygen content of the exhaust gases in the furnace whilst operating under the anticipated most unfavourable operating conditions. The results shall be submitted in writing to Natural Resources Wales	Within four months of the completion of commissioning
IC 7	The Operator shall submit a written proposal to Natural Resources Wales to carry out tests to determine the size distribution of the particulate matter in the exhaust gas emissions to air from emission point A6, identifying the fractions within the PM ₁₀ and PM _{2.5} ranges. The proposal shall include a timetable for approval by Natural Resources Wales to carry out such tests and produce a report on the results. On receipt of written agreement by Natural Resources Wales to the proposal and timeline, the Operator shall carry out the tests and submit to Natural Resources Wales a report on the results	Within six months of completion of commissioning of the waste wood co-incineration plant referred to in activity A5 in Table S1.1
IC 8	The Operator shall submit a written report to Natural Resources Wales describing the performance and optimisation of the Selective Non Catalytic Reduction (SNCR) system and combustion settings to minimise oxides of nitrogen (NO _x) emissions within the emission limit values described in this permit with the minimisation of nitrous oxide emissions. This report shall include an assessment of the level of NO _x and N ₂ O emissions that can be achieved under optimum operating conditions. The report shall also provide details of the optimisation (including dosing rates) for the control of acid gases and dioxins.	Within four months of the completion of commissioning of the waste wood co-incineration plant referred to in activity A5 in Table S1.1

IC 9 is the last requirement in the improvement programme and refers to actual emissions in the first year and a comparison to be made against the assumptions made in the impact assessment. This is to ensure that each component metal is within the environmental quality standards (EQS) / Environmental Assessment Levels (EAL).

IC 9	The Operator shall carry out an assessment of the impact of emissions to air of all the following component metals subject to emission limit values: Cd, As, Cr(VI), Pb, Mn and Ni. A report on the assessment shall be made available to Natural Resources Wales. Emissions monitoring data obtained during the first year of operation shall be used to compare the actual emissions with those assumed in the impact assessment submitted with variation application PAN-000045 (Variation number EPR/BU2489(IT/V009). An assessment shall be made of the impact of each metal against the relevant EQS/EAL. In the event that the assessment shows that an EQS/EAL can be exceeded, the report shall include proposals for further investigative work to determine whether the emissions of these metals from the site can be further reduced.	Within 15 months of the completion of commissioning
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Following the publication of the Large Combustion Plant BREF in 2017 (the Waste Incineration Directive (WID) under which the biomass plant is permitted is also considered) discussions have been held between the competent authorities within the UK, for consistency in interpretation. The interpretations of the LCP BREF and how it relates to combustion activities which includes the burning of biomass is currently still under debate.

Environment Management System (EMS) BS EN ISO 14001:2015

Environmental permit condition 1.1.1 requires the operator to manage and operate the activities in accordance with a written management system. An Environment Management System (EMS) helps organisations identify, manage, monitor and control their environmental matters in a 'holistic' way.

In September 2015 a revised version of the environmental management system standards (BS EN ISO 14001:2015) was published giving 3 years to transition to the new version. After the 15 September 2018 certification to ISO14001:2004 will be invalid. The operator has been in the process of transitioning from the previous version of the recognised industry standard ISO14001:2004 to which the EMS was certified. During the 3-year period the operator required a transition audit to ensure renewal of the certification prior to the deadline. The transition audit took place at the mill the week before the NRW visit. It was advised that there were only observations noted however the report was yet to be issued. The mill is expecting re-certification to the revised standard by the deadline.

The key changes outlined in the new standard are:

- Increased prominence of environmental management within the organisations strategic planning processes;
- greater focus on leadership;
- addition of proactive initiative to protect the environment from harm and degradation, such as sustainable resource use and climate change mitigation;
- improving environmental performance added;
- lifecycle thinking when considering environmental aspects;
- addition of a communications strategy.

The updated and re-vised standard also follows a common structure with the same terms and definitions as several other management standards e.g. ISO 19001. It is understood that this will help organisations which choose to operate in a single or integrated management system to meet two or more standards simultaneously.

4th Anniversary of the publication (30.9.2014) of the official journal (30.9.2018) – Review of BATC document deadline

At the end of September 2018, it will be 4 years since the publication of the revised BREF for the 'Production of Pulp, Paper and Board' (30.9.2018). This date is significant in that the Best Available Techniques (BAT) conclusions will come into force for those that fall under the scope of the document. The operator advised during this visit that there were no issues in respect of this deadline. A discussion was held concerning the document entitled 'Intertissue limited review of the BAT conclusions for the production of pulp paper and board dated 25 March 2015 and a reminder that this would be auditable by NRW in respect of demonstrating BAT. An example was chosen from the document during this audit in respect of BAT 2 of the BREF. BAT 2 refers in brief to the principles of good housekeeping for minimising the environmental impact of the production process. In the operator's response the techniques for this were outlined A to G and demonstrated on site during this visit.

The operator explained that chemicals consumption is monitored on a daily basis where 'in stock levels' are recorded by Nigel Williams an operative on site and entered onto a record. The level gauge on the chemical tanks in use is noted and the amount entered on a check sheet. This record was demonstrated during the site tour and found to be up to date and in line with the discussion around BAT. The operator explained that chemical usage is directly linked to production. Claire Davies the planning manager monitors usage for quality control purposes and this aspect of mill management is reviewed at corporate level. Quality control check sheets are also completed at the mill.

Chemical stock is checked monthly and it is determined from this how much is required based on the level of production. Certain products are also factored in for certain times of the year depending on usage. Stock takes are monitored by the group using SAP which is a software package for chemical purchases however this information is also available to everyone at the mill to carefully manage and control chemical usage on site.



During the site tour the chemical store was visited and found to demonstrate a good level of housekeeping and stock control. The chemicals used in the on-site gas boiler were also visited in the boiler house and could be seen contained and alarmed. The photograph opposite was taken during the site tour and shows the boiler chemicals.

In advance of the deadline of the 30 September 2018 it was considered that the operator demonstrated BAT 2 during this visit.

Permit Condition 1.2 Energy Efficiency

Environmental permit condition 1.2.1 was reviewed with the operator in respect of the energy efficiencies and savings outlined in the annual report. The operator demonstrated an internal spreadsheet which tracks progress against the group targets. Meetings are held on the 'HSSE Objectives and Targets' where progress against projects are discussed and ideas captured on how to achieve them.

The energy team had a meeting at the end of March 2018 which involved staff from across the mill i.e. converting, maintenance and the HSSE for ideas concerning energy savings. The operator demonstrated the minutes of this meeting to the inspecting officer which clearly showed management buy in to achieving group targets. In 2017 the operator was successful in achieving the energy management standard ISO 50001: 2011. It was explained to KD that like ISO 14001 for their EMS there is a need to verify proposed achievements. For example, if by making a change i.e. installation of LED lighting across the mill the calculated energy saving proposed needs to be verified using actual savings / meter readings, once achieved.

Energy efficiency projects identified by the operator were noted in the Intertissue Ltd annual performance report submitted to NRW. Projects listed have been taken from this document and duplicated below for ease of reference. Each one was reviewed, and an update provided during this visit. Where these projects were evident on site they were also visited during the site tour.

In 2018, a number of projects will be started/ continued. These include:

- Continuing the installation of LED lights across site including on converting lines and external areas
- Installation of additional electric car charging point
- New press to be installed on the paper machine to improve energy efficiency
- Installation of Line 9 in converting
- Completion of the switching of the forklift truck fleet to electric
- Implementation of the new ISO 14001 standard
- Implementation of changes to water monitoring in as part of permit condition 3.3.1

It is expected that the new press will be installed on the paper machine during the next shutdown, so this project is on-going. It is expected that this improvement will realise further energy efficiencies on site.

Installation of line 9 ('away from home') is installed and commissioned. This was seen working well during the site tour.

The lighting across the mill and site offices, except for some currently inaccessible areas in the warehouse, have been changed to LED's. During the site tour the operator pointed out markers on the lighting indicating that they had been changed to LED. These markers have been placed on the new lights to ensure that none are missed during the changeover. The external lights are yet to be changed but are planned in the work programme which will include the associated light sensors for their operation. It is expected that all the lights at the mill will be LED by the end of 2018.



Electric car charging points have been installed and hybrid vehicles are on order for staff use. The above photographs were taken during the site tour and show one of the electric forklifts in use across the site. A photograph was also taken of the forklift battery charging station along with the LED lighting which has been replaced in the warehouse. The operator advised that for health and safety purposes the forklifts shine a blue flashing light to the floor, so they are visible as they move around the mill and this was evident on-site. The batteries are usually placed on charge on a shift change for approximately 12 hours overnight for use first thing in the morning to load vehicles for onward delivery of the finished product. The fork lifts are generally used to a greater extent during the day.

Site manager Pavlos Tatsis joined us during the tour which began in the chemical store and accompanied us through the paper machine basement and control room. The traffic light system for energy efficiencies was demonstrated in the control room using the DCS system. The process diagram clearly showed the alarms on significant energy consumers at the mill these include for example pumps, giving a live overview of the energy consumption in kw/ton. At the time of the visit the operatives in the control room were working hard getting the boiler back on line following the essential maintenance. A question was raised over what actions the operator can take in respect of the traffic light changing to amber or red with an increase in energy consumption on a pump for example. It was explained that during certain periods of operation particularly following a shut down there can be a greater strain / demand on pumps etc which can have a knock-on effect on efficiencies, until the process settles down. Demands on operations are often fixed by the process and therefore the overall consumption and savings can be won later from elsewhere in the mill. The operator explained that the traffic light system was an improvement that had come out of the 50001 certification and was a good visual aid to help maintain and improve energy efficiencies on site.

Other areas of discussion during the site tour included improvements on site relating to dust management, fuel storage and a new covered area between converting. A new dust extraction and compression system has been installed in the mill allowing for the dust to be added back into the process. There are no new emission points as a result of this improvement and this was confirmed on site by Gareth Stacey the Converting Maintenance Manager. Oil storage had also been improved on site and 2 new containers installed containing maintenance fuel oils. The containers are subject to regular checks and form part of routine site inspections.



Temporary Diesel Boiler



During a recent shut down for essential work on the gas boiler and the yankee cylinder on the paper machine a temporary diesel boiler was brought to site. The boiler was required to turn the yankee cylinder on the machine during the 'shut down' for the maintenance work . This was quite a unique event and a discussion was held over any requirement to notify NRW in such circumstances. A discussion was had in respect of environmental permit condition 4.3.5 and this was cross referenced with NRW guidance document 'How to Comply'. The guidance document was open to interpretation and it wasn't

completely clear for this example. It was agreed that there were no emissions or 'consequences for the environment' based on the location, boiler capacity and any emissions from the boiler blow down to the effluent treatment plant which were well within the parameters of the permit. However, the stack from the boiler was outside of the agreed emission point so it was advised that the operator would e-mail the inspecting officer regarding the minor temporary change. The boiler was brought to site on the 2 May 2018 and used between the third and the early hours of 7 May 2018. Following the visit, the operator immediately e-mailed the inspecting officer as agreed and advised that the communication procedure linked to the site EMS will be updated to include notifying NRW for this type of temporary change. Furthermore prior to the next planned shutdown at the end of the year the operator will consider the communications procedure in light of the proposed work. A photograph was taken during the site tour and shows the temporary diesel boiler on site disconnected prior to removal.

AOB

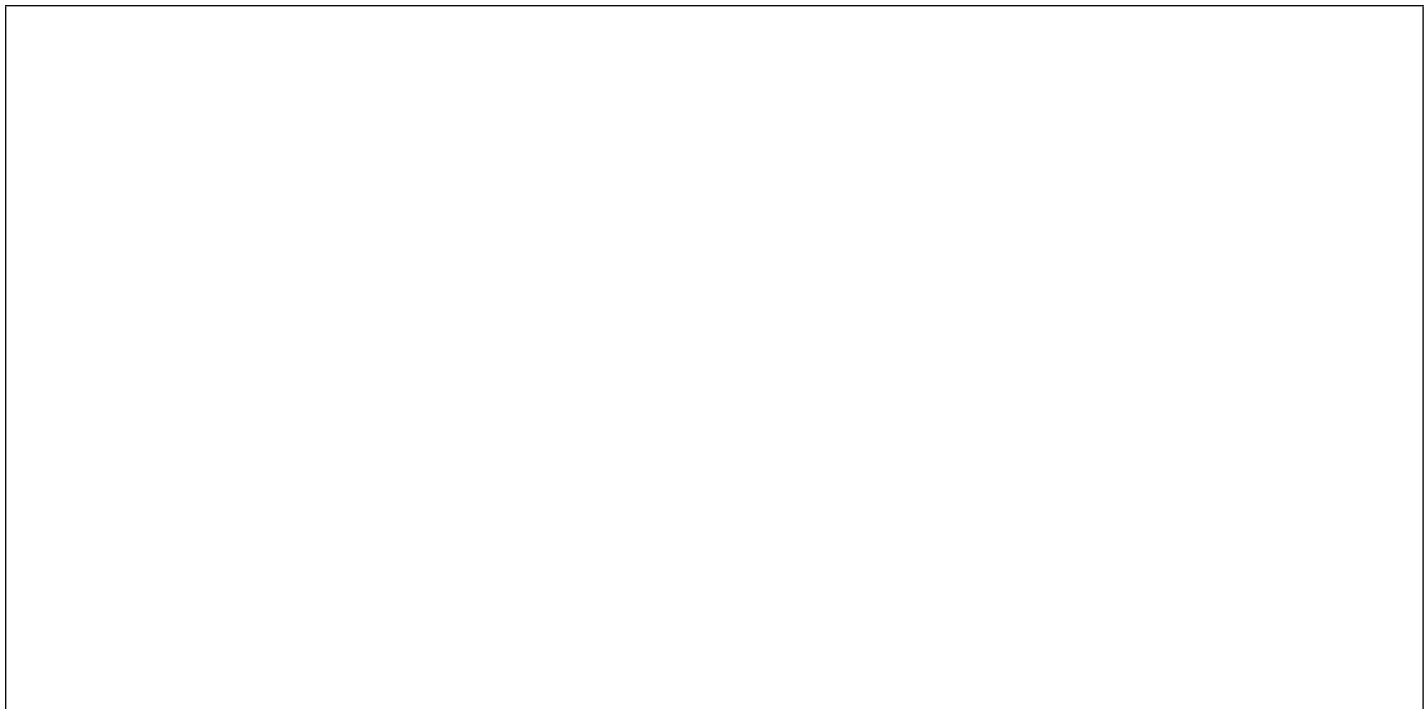
- A question was raised over the presence of the operators permit on the NRW website. All the paper mill permits in Wales are on the NRW website which were placed on their following the permit variations for the BREF.
- KD advised that she would be attending the EA paper and pulp sector group meeting the following week. A discussion was held on the main objectives and agenda items. Fire Prevention Plans (FPP) continue to be high on the agenda for the EA sector group. Recommendation: Following the publication and sharing of the NRW FPP guidance it would be beneficial for Intertissue Ltd to review it in respect of the current accident management plan and adopt any good practice where possible.
- DONM – A routine visit is planned for Q4 (financial year 2018-19)

Conclusions

This was a routine NRW audit of the Intertissue Ltd paper mill and no non-compliances of the

environmental permit were identified in the areas visited. The audit was broad but also took an in-depth approach to the pre-operational and improvement conditions in the environmental permit, associated with the proposed biomass project. The biomass project is currently on hold however it was considered prudent to go through the conditions with the operator should the project recommence. A more in-depth approach was also taken with the energy efficiency permit condition and chemical minimisation (BATC 2). The operator is on track for the fourth anniversary of the publication of the revised BREF deadline of 30/9/2018 and this was demonstrated during the audit. It was most apparent that environmental sustainability is at the heart of operations at Intertissue Ltd and the wider Sofidel Group and this was evident during the audit which is welcomed by NRW.

[End]



EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033457**

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

Site	Intertissue Neath	Permit Ref	BU2489IT
Operator/Permit holder	Intertissue Ltd	Date	10/05/2018

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			

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.