

## Compliance Assessment Report

Report ID:  
CAR\_NRW0000160

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

Site	Flint Paper Mill EPR/BJ9703IM	Permit Ref	BJ9703IM		
Operator/Permit holder	Kimberly-Clark Limited				
Regime	Installations				
Date of assessment	21/03/2016	Time in	13:00	Out	15:30
Assessment type	Site Inspection				
Parts of the permit assessed	Effluent treatment, waste management				
Lead officer's name	Soper, Alison				
Accompanied by					
Recipient's name/position	Jan Partridge/ Site Process Engineer, Environment & Quality	Date issued	12/04/2016		

### Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
<p><b>KEY:</b> See Section 4 for breach categories, suspended scores will be indicated as such.  <b>A</b> = Assessed or assessed in part (no evidence of non-compliance), <b>N</b> = Not Assessed, <b>X</b>= Action only</p>		

<b>Number of breaches recorded</b>	<b>0</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>0</b>
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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

### Permit review

The draft permit variation was discussed to ensure that it is correct prior to the planned issue date of 31 March. This variation will also be used as an opportunity to reduce some of the emission limit values for emissions to water. These had not been amended since before the PPC permit was issued in 2003 and do not reflect the current performance of the effluent plant. The BOD limit of 70mg/l is also well above the suggested level of 25mg/l in the BAT conclusions document. BOD will be reduced to 35mg/l and ammoniacal Nitrogen to 4mg/l. The maximum daily volume will also be reduced.

The OPRA spreadsheet will need to be reviewed to take account of these changes.

### Effluent treatment plant

The effluent plant performance has improved significantly and is now well within the emission limits. Improvements have been made to try to prevent a recurrence of the filamentous bacteria in the sludge. The surface aerators will be used for cooling based on need rather than the time of year as the high temperatures around Christmas are thought to have contributed to the problems. The nutrient dosing has been improved and additional training has been given to staff working on the plant and sampling the effluent. A Part B notification is still needed to give a summary of the investigation into the problem and its resolution -**Action**

### Waste management

There is good segregation of waste produced on site, the skips are checked regularly and staff awareness appears to be good. There is a project underway to divert the pulper rejects from landfill as this is a significant proportion of the waste produced.

### Environmental Management

Environmental aspects are included in the daily meeting and targets are listed on a board in the meeting room. This includes monitoring and reporting requirements. Inspections are carried out monthly of the bunds and any observations are put into the HAZMAP system for follow up. Preventative maintenance isn't linked to the environmental aspects, but it is carried out and there is good awareness of the importance of the effluent plant to the overall site operation. There is a good system for escalating issues and support can be obtained from Kimberly Clark's global experts.

## EPR Compliance Assessment Report

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Operator/Permit holder	Kimberly-Clark Limited	Date	21/03/2016

### 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.

### 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 reports 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 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.