

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	08/03/2019	Time in	09:30	Out	13:00
Assessment type	Audit				
Parts of the permit assessed	See CAR form				
Lead officer's name	Dunn, Karen				
Accompanied by					
Recipient's name/position	Kerry Mckinnon / Environment Manager	Date issued	29/03/2019		

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	
C2 - General Management - Management system and operating procedures	C3	1.1.1
C3 - General Management - Materials acceptance	C3	3.1.2
C4 - General Management - Storage, handling labelling and Segregation	A	
E5 - Emissions - Waste	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	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	2	Total compliance score (see section 5 for scoring scheme)	8
------------------------------------	----------	---	----------

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

The following agenda was provided in advance of the audit:

Introductions and site update

Permit condition 1.4

Site tour focusing on the areas visited during the audit.

AOB – NRW update

Introductions and Overview

This visit began with any matters impacting on the business and an update on current areas of work. In brief business has been good, raw materials namely wood prices have increased, and this has impacted on the cost of virgin pulp and finished product. Business fluctuated slightly since the last visit but has now picked up and a large customer returned to the mill. In February a shut-down saw a major upgrade of the digital control system (DCS) providing amongst other things, better control over energy usage. The shut-down was unexpectedly prolonged but also included the routine boiler checks and paper machine maintenance. The operator provided an update on the biomass plant in that a corporate decision has meant it is on hold. The main objective of this NRW visit was to undertake an in-depth audit focusing on waste management and the permit conditions relating to the avoidance, recovery and disposal of wastes produced by the permitted activities. Waste characterisation, recording and tracking routes of disposal, internal audits and recovery of waste off site were also explored. The main aim sought to examine the operators approach to waste management and fulfilment of the requirements of the permit as well as associate legislation and guidance. A local NRW driver was behind this audit resulting from operators falling foul of their responsibilities through the overreliance on a waste contractor. Therefore, it also sought to examine the provision and understanding at the mill to meet operator responsibilities concerning waste management.

Schedule 5 Permit Notification

Just prior to the audit on the 6 March 2019 the operator submitted a notification to NRW in line with environmental permit condition 4.3.1 (b). The notification was for a breach of the emission limit value (ELV) for Biological Oxygen demand (BOD) in the final effluent from the treatment plant. Both section A and B of the notification was submitted along with further information on e-mail. This submission was discussed at the beginning of the audit and any potential measures that could be used on site to prevent a repeat breach of the ELV. In short due to an unprecedented prolonged shut down period it was considered a 'one off' event that is unlikely to be repeated. Through an investigation it was considered that the shut-down had impacted on the plants ability to process effluent despite on-site checks which lead to the high BOD.

There is a weekly (condition 3.3 Table S3.2 'Monitoring') requirement in the permit for BOD sampling from the biological ETP which has an ELV of 25mg/l. On receipt of the lab report on 6 March 2019 the BOD result for a sample on 21/2/19 was 35.29mg/l taken during the 'shut down'. The following weeks sample was permit compliant. Concerning timings, the operator has asked the laboratory to ensure

FULL CAR ON DMS

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0034889**

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	08/03/2019

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			
C3	C3	See CAR form, unprecedented prolonged shut down on the mill resulted in the elevation in BOD despite checks of the ETP when it came back on line. Was back in compliance quickly and such a long shut down was unique when considering actions to prevent it happening again. Please refer to report.	30/04/2019
C2	C3	Operator to review the hazardous waste consignment note guidance and ensure they are completed in line with the requirements.	30/04/2019

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.