

Compliance Assessment Report

Report ID:
CAR_NRW0031842

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

Site	Bridgend Paper Mill EPR/EP3738NG		Permit Ref	EP3738NG	
Operator/Permit holder	Northwood & Wepa Ltd				
Regime	Installations				
Date of assessment	14/06/2017	Time in	09:45	Out	16:30
Assessment type	Audit				
Parts of the permit assessed	See below				
Lead officer's name	Dunn, Karen				
Accompanied by					
Recipient's name/position	Steve Barwick / Environment and Health and Safety Manager	Date issued	05/07/2017		

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
A1 - Specified by permit	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
E3 - Emissions - Surface water	A	
F3 - Amenity - Dust/fibres/particulates and litter	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

Please refer to CAR version on the DMS as the system could not cope with the formatting of the content of this report form.

This was a pre- arranged visit and the company representatives present were:

Steve Barwick – Environment and Health and Safety Manager

Steve Loveluck – Environment and Health and Safety Officer

Richard Mordecai – Senior Process Technologist

The following agenda was provided in advance:

- Annual EA/CPI meet – NRW slides
- NRW sector objectives for 2017/18
- Update on Improvement Conditions - update IC6 study
- NRW position regarding Fire Prevention Plan Guidance
- Updates on proposed improvement projects i.e. Swordfish etc.
- Site tour of broke yard
- AOB

Introduction

The main purpose of this visit was to catch up with the operator on a variety of matters from recent meetings, including NRW objectives for the paper sector 2017/18 to improvement condition submissions. The audit mainly took a broad approach with the main objective being to establish if the operator is still on track for the compliance date of 30 September 2018 for the revised Best

Available Techniques (BAT) Associated Emission Limits (AEL's) (NB/ the compliance date is the fourth anniversary of the publication of the Best Reference Document (BREF) for the Production of Pulp, Paper and Board). This visit was undertaken after a busy period of improvement condition submissions and the annual monitoring and reporting period required by the environmental permit and the European Pollution Release and Transfer Register (EPRTTR). Following the issue of the varied permit, on publication of the revised BREF the operator had an improvement condition programme placed on them. The improvement conditions related not only to the BREF documents but requirements directly associated with the Industrial Emissions Directive (IED) i.e. baseline reports and the Water Framework Directive (WFD) to include the changes to the list of the priority hazardous substances screen.

Site Overview

The visit began with a discussion on current matters concerning the business. In brief business has been good however in the same vain the site is carrying a number vacancies due to recent staff movements. The operator explained that the head count has in recent years gone from an all-time low to a number of additional staff, the majority of these roles are associated with the increase in converting lines installed by the previous owner operator. Northwood and Wepa Ltd are investing in the Bridgend mill which has seen a number of environmental improvements and are documented in brief on this compliance assessment report (CAR).

Annual EA/CPI meet – NRW slides

Following an overview of current business matters the site inspector went through a short presentation given by NRW at the annual Environment Agency (EA) meeting with the Industry body (Confederation of paper Industries/ CPI). The presentation shadowed the EA agenda items to give the operator the position on these matters in Wales. A copy of the presentation was given to the operator which also outlined current matters under discussion on the EA and NRW paper sector groups. The presentation had also been given on request to the CPI. For ease of reference the following slide has been taken from the presentation which details the objectives planned for 2017/18:

NRW sector objectives for 2017/18

To liaise where necessary and provide advice on the reviewed permits and ensure that any improvement programmes and BAT gaps are on track and ultimately fulfilled by the 4 year anniversary of the publication of the official journal (BREF) 30 September 2018.

Continue taking a risk based approach to our regulation which includes any local considerations where necessary.

Routine audits around Containment / IBC storage of chemicals to drive improvements and reduce the risk of incidents and accidents to the environment.

Continue to take a sector approach in Wales.

For further information the operator can refer to the presentation provided.

NRW position regarding Fire Prevention Plan Guidance

KD advised that NRW is in the process of publishing a Fire and Mitigation Plan Guidance document which has been written with the Fire and Rescue Service (FRS). The guidance is currently in the process of being consulted on with the waste sector and translated into Welsh. As soon as it has been published KD will share it with the operator for consideration within the site Accident Management Plan / Emergency Procedures.

Action: Operator to confirm that the Emergency procedures in the EMS is now the Accident Management Plan for the site.

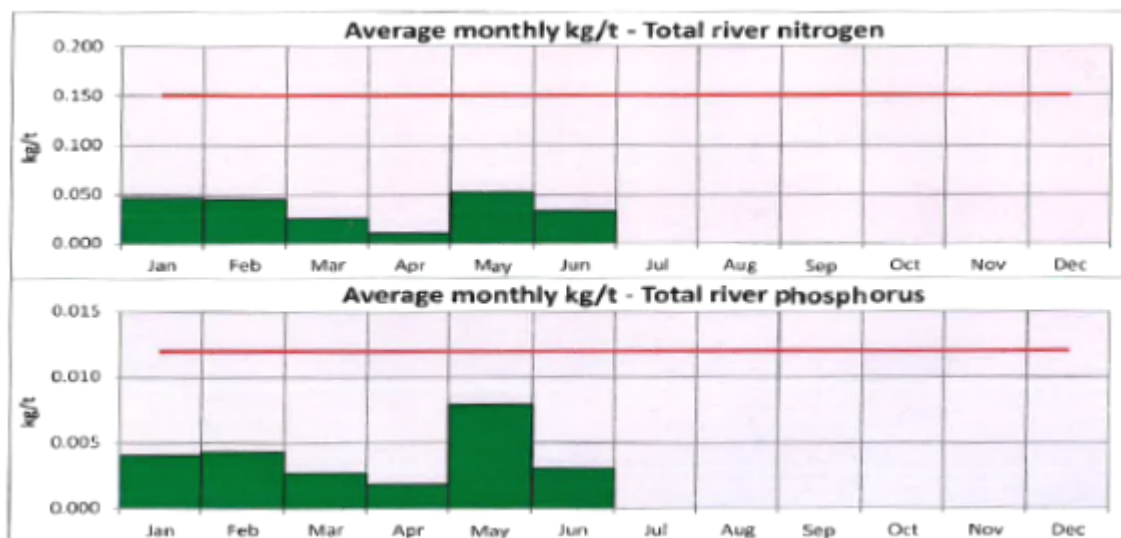
Action: KD to forward the NRW Fire Prevention & Mitigation Plan Guidance to the operator on publication.

Update on Improvement Conditions - update IC6 study

Environmental Permit Condition 2.4 Improvement Programme

IC 6	The operator shall submit, for approval by Natural Resources Wales, a report detailing how compliance with the annual limit for total phosphorus will be achieved in order to demonstrate compliance with BATc 50.	30 th September 2016
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The following improvement condition was added to the operator's permit which directly relates to the BAT conclusions (BATc 50). BATc 50 has been published in the Official Journal of the European Union 'In order to prevent and reduce the pollution load of waste water into receiving waters from the whole of the mill'. The improvement condition relating to this requirement for the mill has been replicated below for ease of reference:



Early discussions were held with the operator over the tighter limits in the BREF for Total Nitrogen and Total Phosphorus in order to ensure compliance by the anniversary of the publication (30 September 2018). The concern expressed by the operator related to the level of phosphorus in the intake water as it has been known to spike and if there was an operational need to dose the effluent treatment plant there would be no room to do so with the revised tighter limits for nitrogen and phosphate.

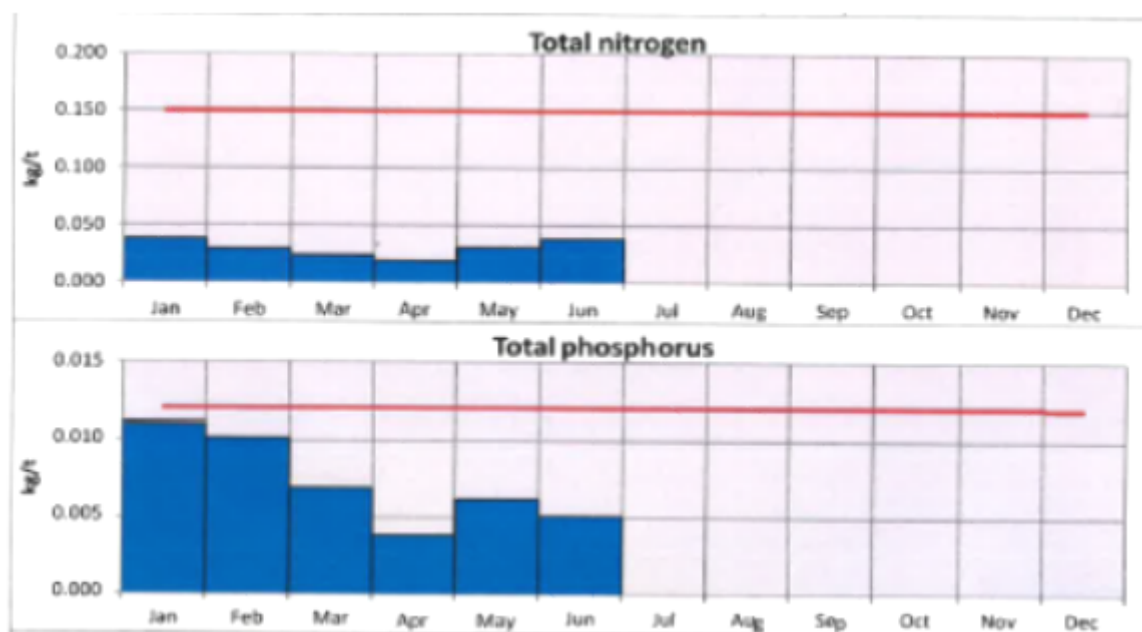
The operator provided a response to the improvement condition by the permit deadline which proposed a study group to investigate elevated phosphorous in the mills final effluent. The operator carefully monitors the quality of the intake water for use in the process it is acknowledged that there is a sewage treatment works and other inputs upstream of the mill that can alter the chemistry of the incoming water. During this visit a discussion was had over the Total Nitrogen and Total Phosphorus in both the final effluent and the intake water which can vary and this was demonstrated on an average monthly (Kg/t) trend. The following bar charts show the results in 2017 for the intake river water for Total Nitrogen and Total Phosphorus:

In the results of the abstracted river water it can be seen in May 2017 for example that total phosphorous Kg/t increased from the previous and proceeding months. These fluctuations in the water chemistry need to be considered by the operator in managing the operations of the mill. Just prior to the visit the operator provided a copy of the phosphorous investigation to fulfil IC6. In brief the report outlined the investigation into how phosphorous was entering the effluent stream in the process in order to reduce it. The investigation was a success and has resulted in the identification of areas for improvement to help the operator meet the BAT AEL (BATC 50). These include a chemical used in the process which had a particularly high phosphorus level and a retraction issue with a recycle valve on a spray nozzle in papermaking. Discussions were had with the operator during this visit on the planned approach following this investigation which involves a follow up of the valve retraction issue and the chemical production company is looking at reducing the amount of phosphorus in their product. NRW accepts the report into the phosphorus investigation discharging IC6.

Action: Operator to advise NRW at the next visit on the resolution of the issue identified with the recirculation valve on the spray nozzle.

The following graphs were also demonstrated during the visit and show the monthly average water emissions for total nitrogen and total phosphorus trended against the new BAT AEL. The graphs show compliance with the tighter limit at this time (the BAT AEL limit is represented by the red line on the graphs which has a deadline for compliance of 30/09/2018). The operator is well within compliance for nitrogen and phosphorus is also below the red line so NRW can confirm that the operator appears to be on track and currently meeting the revised limits. A discussion was also had on nutrient dosing and the combination product of nitrogen and phosphorus on site. The operator advised that nutrient dosing has stopped and consideration of just dosing with nitrogen maybe required in future and no phosphorus in order to keep the effluent plant healthy.

Average Monthly Water Emissions for Annual kg/t



Updates on proposed improvement projects

There has been a number of improvements taken place at the mill and projects that are currently on-going, this is a real positive not only the business but also environmentally. These investments have included an upgrade of the onsite sewage treatment works (STW) with better aeration. The STW was visited during the on-site tour and photographs taken of the work can be seen below left

and central. The photographs show the pump and aeration to the effluent and associated health and safety measures around the STW which on treatment discharges to the main effluent treatment plant. The operator explained that previously the STW which serves the foul drainage only was prone to flooding around the chamber and on occasion gave rise to localised odours. Since the installation of the new pump and aeration pump the operator has seen an improvement to the treatment of the foul drainage.



The photograph above right was taken of the new filtration plant which was due to start the commissioning phase on Monday 19 June 2017 just after the visit. The new filtration plant uses glass as a different 'in vessel' filter media and is a change from the current sand filter beds. The glass media has different properties when in use and can help to reduce the usage of some of the most environmentally polluting chemicals used in the process i.e. biocides. The continued reduction and consideration of the usage of the most environmentally polluting chemicals falls in line with the principles of the sector BREF so this project is also considered an environmental improvement to the mill. The treatment of water is termed a directly associated activity and is listed in the environmental permit under Schedule 1 'Operations'.

Action: Operator to review the treatment of water DAA originally submitted with the environmental permit application and update it where necessary to reflect the changes associated with the new filtration plant.

Action: Operator to ensure that any procedures associated with the DAA are updated and incorporated into the EMS.

In recent years the operator has installed a new dust extraction and baler system. This has been a great improvement in the management of dust and broke both in the mill and yard. The on-site tour focused on the areas visited by this audit and just prior to the tour the operator outlined the management responsibilities of the yard and broke handling system.

The overall responsibility of broke usage in the yard falls to the papermaking manager. The use of

broke depends on the type i.e. kitchen towel or toilet tissue needed in the process for manufacturing. The quantities in the yard are also greatly dependent on consumption and throughput which in turn is influenced by the stability of the paper machine (Jupitar). The on-site waste contractors undertaken regular patrols of the site which include the yard as well as the Environmental and Health and Safety Manager and Officer. The on-site waste contractors also help with moving and stacking of broke bales and the creation of fire brakes. Most recently following the publication of the revised 'Waste Industry Safety and Health Forum' (WISH) guidance the operator had reviewed it and implemented where possible on site in preparation for a visit from their insurers and for fire safety purposes. The inspecting officer advised that the revised WISH guidance had also been considered in the NRW Fire Prevention and Mitigation Plan Guidance recently compiled with the Fire and Rescue Service. This will be shared with the operator on publication for consideration in their on-site procedures.

Action: NRW to share the NRW Fire Prevention and Mitigation Plan Guidance on publication with the operator.

The site tour began in converting where the dust extraction / filter system and briquetter was seen in operation. A question was raised with the operator about the high level area and blow down frequency around the extraction system to ensure it is captured along with the converting lines as dust accumulation was evident on ducting in this location. The operator advised that this area was blown down at the same frequency as the converting lines.

Converting trim / broke handling on the lines was also evident and fully installed and operational at the time of the visit. During the initial stages the operator experienced some commissioning issues with the system but during this visit it was seen to be working well. The photographs below were taken in converting, the picture to the left shows a yellow hopper for the collection of converting trim in the caged area for overhead transfer to the shredder and delivery by ducting to the baler. This system brings a number of environmental improvements to the mill which include the reduction in fork lift movements in turn reducing mechanical energy consumption and chemicals needed to break down the fibres of un-shredded broke, reduced dust emissions, baler breakdowns and reduced fire risk. On visiting the baler there was localised dust where some shredded tissue had collected in the by-pass ducting flap keeping it slightly open. The operator advised that this will be reported to maintenance for clearing.

The operator has also installed a number of plastic and cardboard compactors on site for baling waste. The photograph above right show the compactors in converting for plastic wrap and cardboard. This change has realised a number of benefits by way of house-keeping and recycling of these waste streams by the operator. This investment is another real positive improvement on-

site.



To highlight the before and after status concerning the dust in the broke yard the following photographs have been included in this report with the after

photographs taken during this visit.

Before photographs can be seen opposite and were taken in the broke yard in 2014 (CAR ref 5699). The dust from the old baler use to cover the vegetation in the broke yard and the old baler often broke down and bales were less compact and uniform making them harder to handle and use efficiently in the process.

After photographs opposite left shows the bag filter which forms part of the improved dust extraction and baler system. The emission point from the old baler was blocked up which can be seen below left just above the improved baled broke. The photograph below right was taken during the visit and the vegetation was clear of dust and the house keeping in the yard has greatly improved.

An inspection of the sodium hypochlorite tank and bund was also made during this visit the operator advised that the mill no longer decants this chemical used in the process and they were in the process of undertaking some maintenance on the pumps and cleaning the bund. The inspecting officer advised that for 2017/18 auditing around containment had been added to the objectives for the paper sector for Wales (see above slide) and this will be re-visited following the permit review and to further improve and reduce the risk of incidents and accidents to the environment. The operator explained that less sodium hypochlorite was also being used in the process which again is a driver in the revised BREF.

Following the broke yard where fire breaks were evident in the stake bales and the house keeping was much improved the sludge press was visited. In the annual report the operator had made comment that the sludge had been slightly wetter and this was evident in the percentage dry matter reported on as part of the environmental permit. A large investment by the previous owner operator saw the installation of a new sludge press the benefits of which were a reduced dryer sludge for improved handling. Subsequent maintenance has seen the sludge which is screw pressed and dropped into a roll on roll off skip for use in animal bedding return to a drier state. The officer was able to see the condition of the sludge during this visit.

The operator advised that the drainage works are also complete on site to which there is on-going maintenance. The final stage being the repair of the culvert that runs from the site entrance beneath the mill. The repair was required as a sink hole had appeared close to the site entrance and posed a flooding risk to the finished product warehouse. The operator contacted NRW prior to the start of the works and Flood Risk Management provided advice which was passed onto the operator.

There are two new converting lines proposed for the mill which is good news for the business one will be a replacement 'line 14' called 'line 21' and an additional 'line 20'. This will take the mill to 7 converting lines from 6. A question was raised over whether there would be any new emission points associated with the lines and it is understood that line 20 will be retrofitted into the current system and line 21 and line 20 will have a bag filter. The inspecting officer advised that any new emission point would require a variation however if the details are outlined the information can be passed onto NRW permitting for advice.

Action: Operator to complete a 'Minor Operation Change and Variation Assessment Form' for the bag filter, filtration plant and any proposed emission point from the new converting lines. The inspecting officer will then pass this on to environmental permitting to advice on any permit variation requirements.

Environment Management Systems – Permit Condition 1.1.1

In respect of permit condition 1.1.1 the operator was asked about the on-site Environment Management System (EMS). The site EMS currently certified to ISO14001:2004 standard is in the process of being updated to the new 2015 version. The operator explained how a very useful visit was had at an unrelated company currently operating to the new standard which will help in the transition.

The key changes to the new standard (EN ISO 14001:2015) are:

Increased prominence of environmental management within the organisation's strategic planning processes;

- greater focus on leadership;
- addition of proactive initiatives 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 a number of other management standards e.g. ISO 19001. It is understood that this will help organisations which choose to operate a single or integrated management system to meet two or more standards simultaneously.

Following the publication of the EN ISO 14001:2015 the operator has 3 years to adapt the certified EMS to the new edition of the standard.

Recommendation: Operator to consider any updates of any procedures linked to the environmental permit during the transition to the new standard (EN ISO 14001:2015) and incorporate them where appropriate.

Energy efficiency

A question was raised over the response to BAT 53 'Energy Consumption and Efficiency' and the proposal to the mill achieving ISO 5001. The operator explained that the current focus is the transition from of the EMS to the new standard. The operator explained that the energy department has most recently been effected by staff movement so this proposal is currently on hold. NRW was advised that there was an energy efficiency plan in place and areas of the process had been identified for energy savings. Environmental permit condition 1.2 entitled 'Energy efficiency' has been replicated below:

Action: Operator to provide NRW with a copy of the energy efficiency review in respect of permit condition 1.2.1 during the next routine visit.

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Conclusion

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There have been a number of investments by Northwood and Wepa Ltd of late and these in turn have brought environmental benefits to the mill which are welcomed by NRW. The main objective of this audit was to assess progress with the BAT AEL's (deadline 30 September 2018) and in particular BATc 50. NRW can conclude that during this visit the operator was found to be on track and currently in compliance prior to the associated deadline for BATc 50. The associated improvement condition (IC6) and phosphorus investigation report that had been compiled by the study team was also accepted to discharge this requirement. A number of actions have been included in this report and are tabulated within the text and collated at the end of this form.

For information:

Guidance for Pollution Prevention

A review plan for pollution prevention guidance (PPG) is currently underway. The review will result in a **replacement guidance series**, with new branding and title **"Guidance for Pollution Prevention" (GPPs)**. It is aimed that the new series will provide environmental good practice guidance for the whole UK, and environmental regulatory guidance directly to Northern Ireland, Scotland and Wales. For businesses in England, regulatory guidance is available from GOV.UK instead.

A full list of GPP's can be found on the NetRegs site using the following link:

<http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and->

<replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

Water Framework Directive

For more information on water body status related to the Water framework Directive and their classification around Wales can be found using the following link:

<http://waterwatchwales.naturalresourceswales.gov.uk/en/>

[End]

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0031842**

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

Site	Bridgend Paper Mill EPR/EP3738NG	Permit Ref	EP3738NG
Operator/Permit holder	Northwood & Wepa Ltd	Date	14/06/2017

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.

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.