

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

Site	Bridgend Paper Mills			Permit Ref	EP3738NG		
Operator/ Permit holder	Northwood and Wepa Ltd						
Date	5 June 2015			Time in	10:00	Out	14:00
What parts of the permit were assessed	See Below						
Assessment	Choose an item.	EPR Activity:	Installation	X	Waste Op		Water Discharge
Recipient's name/position	Steve Barwick – Environment, Health & Safety Manager						
Officer's name	Karen Dunn - PPC Officer			Date issued		8 June 2015	

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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

Condition(s) breached

a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	A	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed or assessed in part (no evidence of non-compliance), N = Not assessed, NA = Not Applicable

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

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

Steve Barwick – Environment and Health and Safety Manager
Richard Mordecai – Senior Process Technologist

Introduction

Since the last NRW audit on 30 September 2014 there has been a change to the Environment Manager for the site with the departure of Richard Lewis (RL) from Northwood and Wepa Ltd. Steve Barwick (SB) is now the central point of contact for NRW at the Bridgend Paper Mill and is the Environment, Health and Safety Manager for the site. Due to this staff change the main objective of this visit was to review the actions and recommendations from the previous Compliance Assessment Report (CAR) form reference 5699 with the operator. The main aim of the visit was to gain an up to date position concerning a number of on-going matters on site involving the drainage, dust extraction etc. The visit also sought to provide feedback on the operator's response to the NRW Environmental Permitting Regulation 60(1) Notice and inform the operator of the next stage to this process.

Site Overview

The visit began with discussions and an overview of current matters concerning the paper mill. On the day of the visit further staff change was taking place with the departure of Hiram Mullan the mills Energy Co-ordinator. In future the Combined Heat and Power (CHP) plant will be managed by the Engineering Department. Representatives from the Confederation of Paper Industries (CPI) were also on site during the visit and were providing advice and guidance in the handover of the management of the CHP. Although the overall head count at the mill has increased since the de-acquisition of the mill from the previous owners it is still in a period of flux and this has included a number of changes to the site management.

Objective 1 – To review the Table of Actions / Recommendations (CAR 5699) with SB following the departure of RL :

The following action / recommendation table has been replicated from CAR reference 5699 below for ease of reference:

<u>Action / Recommendation</u>	<u>Deadline</u>	<u>Update</u>
Action: Operator to review and update the files in the gate house used in the event of an emergency at the Bridgend Mill.	Immediately	Complete: SB explained that the file in the gatehouse had been updated recently and the information kept is still subject to review. On leaving the Bridgend paper mill KD asked to see the file containing the most up to date drainage plan. The security guard immediately provided the information requested and the relevant folder contained both up to date drainage plan and materials data sheets.
Recommendation: Operator to consider creating a consolidated 'Accident Management Plan' linked to the sites EMS and environmental	N/A	This area has been reviewed by the operator and existing documentation will be amended to include environmental

permit. Consideration should be given to the guidance referenced in this CAR (5699) in the production of the plan.		considerations as well as Health and Safety where necessary.
Recommendation: Operator to consider the inclusion of the energy efficiency work at the mill in respect of permit condition 1.2 which requires a 4 year review.	N/A	SB will be meeting with the mills engineering department shortly to discuss energy efficiencies. These will then be incorporated into the required 4 year review (permit condition 1.2). SB is currently considering the Energy Savings Opportunity Scheme (ESOS) and advice is also being sought from the CPI in this area of the business.
Recommendation: Operator to consider the guidance documents EEMUA 231 and CIRIA C736 for the prevention of pollution in the operations at the Bridgend paper mill.	N/A	The operator has considered all the recommendations in the table and will be addressing them on a rolling programme. This includes reviewing the guidance documents referenced by NRW 'The mechanical Integrity of plant containing Hazardous Substances' EEMUA 231 and 'Containment Systems for the Prevention of Pollution' CIRIA C736.
Recommendation: To review the list of documents in the EMS manual to ensure it reflects the procedures used on site.	N/A	The operator is reviewing the EMS and had completed around a 1/3 at the time of the visit.
Recommendation: MSDS to be added to a consolidated accident management plan. Along with a list of chemicals/ raw materials kept on site.	N/A	This work is on-going as mentioned above however on exit of the paper mill the emergency procedure file was reviewed please the first action in the table.
Action: Operator to clarify what maintenance is undertaken on the site bunding as detailed in EPR05.	31 March 2015	On-going - Operator further mentioned the security guard check sheet as detailed in the previous CAR 5699 however consideration of the addition of site bunding / tanks etc. on the preventative maintenance schedule is required following the review of the guidance referenced in the above recommendation.
Action: Operator to review the chemical storage in the 'Jupiter chemical kitchen' and to incorporate it within the appropriate procedure linked to the EMS.	31 March 2015	On-going - Since the last visit the operator had cleaned the 'Jupiter Kitchen'. The lattice had been lifted, and the bund within the floor has been cleaned. Please refer to comments under site visit.
Action: Operator to review the door being left open to the chemical store and the pathways a spill in this area would take in order to prevent a pollution incident to the environment from this location.	31 March 2015	Review is complete – Both the door and the self-closing mechanism is damaged. The door is in the process of being changed for a new one. This is welcomed by NRW as it will help keep out rain water (and dust while this area is being addressed) preventing it from collecting in the store. To be revisited by NRW at next audit.
Action: Operator to provide periodic updates on e-mail concerning progress with the drainage project and to provide a timeline for the expected completion of this work	31 March 2015	On-going: SB will be providing on-site training which will include an environmental awareness across the site for staff. The drains have been colour coded red green and blue.

		<p>Red – Straight to Effluent Treatment Plant (ETP);</p> <p>Green – Straight to Foul;</p> <p>Blue – Straight to Nant Gwyn.</p> <p>A number of localised flooding issues have been addressed around the entrance to the mill and converting. Roof repairs are on-going and over the last few months the drains in dispatch have been cleared and maintained. During this visit KD enquired over the repairs to the damaged drains that had been identified as part of the drainage survey. SB to provide a further update at the next visit on the site drainage work.</p>
Action: Operator to provide a copy of the most up to date drainage plan for the site. Action complete 1 Oct 2014.	31 March 2015	<p>Complete (1 October 2014).</p> <p>Operator to ensure that records are kept up to date regarding the drainage plan. If there is any changes to the plan a copy should also be sent to the regulator to sit alongside the permit.</p>
Action: Operator to review 'Bund Emptying Procedure' EPR 14 to ensure that all the lessons learnt from the June 2013 incident are incorporated.	31 March 2015	<p>Complete – Copy of the updated bund emptying procedure was provided during the visit. The updated version is dated May 2015.</p>
Action: Operator to provide NRW with an action plan on e-mail to address the accumulation of tissue fibre or 'dust' in all areas of the mill.	27 February 2015	<p>Complete as there is no longer a need to provide NRW with an action plan as this work is now linked to a capital investment project which involves the installation of dust extraction. See comments below.</p>
Action: Operator to review the storage on the hard standing of the loose 'broke' in the secondary fibre yard.	31 March 2015	<p>Review Complete - the operator was able to advise NRW that a new baler is planned for the third quarter of 2015. It is proposed that in future all broke will be shredded and baled which will provide a number of improvements to the current situation e.g. dust filtration, ability to stack bales and the handling and addition of the shredded broke bale into the process. It is also expected to help in the management of rejected reals in the secondary fibre yard. NRW welcomes this proposed improvement as dust on site in converting and the secondary fibre yard needs to be addressed and this area will be re-visited in a future audit.</p>
Action: Operator to review the storage of cores at the back of the yard and the access to services in the event of an emergency.	Immediately	<p>Review Complete: Following the last visit the cores were moved and the Operator has put barriers in place to keep the access to the services clear. See comments below.</p>
Action: Operator to confirm in writing when the gas turbine was changed in the CHP and the replacement type.	27 February 2015	<p>On-going - Due to the staff changes SB has a meeting planned with the engineering plant to discuss this.</p>

Recommendation: Operator to consider the energy efficiencies in respect of a change in gas turbine when considering the 4 year review under condition 1.2.	N/A	As above
Action: Operator to provide feedback to NRW on the waste heat trial on the CHP.	27 February 2015	Complete: This trial was rejected on Health and Safety grounds.
Action: IT to send RL a copy of the Eel Screening Guidance to help the mill adopt best practice on their abstraction in respect of the Eel Regulations (England and Wales) 2009. (IT sent guidance on email)	Complete	Complete – NRW's Ida Tavner (Fisheries Technical Specialist) has sent the Eel Screening Guidance to the operator. SB advised during this visit that he has a copy of the guidance and has reviewed it.
Action: KD to check that JF has received the URS report on the demolition of the tank farm. Confirmed letter sent 1 October 2014 Action Complete.	Complete	Complete – NRW letter sent in confirmation 1 October 2014.
Recommendation: Operator to review the notification process and procedures considering when necessary /un-necessary to notify the regulator under the terms and conditions of the site permit. A notification procedure should also be included in the accident management plan to prevent non-compliance with the permit.	N/A	This work forms part of the on-going review by SB of the EMS currently in place at the mill.

Objective 2 – To undertake a site tour with the operator to visit the areas discussed in the above review.

A site tour was undertaken with SB to review the areas visited during the review of the action / recommendation table from the last visit. From the review it was noted that there were a number of matters that are still on-going. However those relating to dust are now linked to a capital investment project which is welcomed by NRW. Unfortunately there was no handover from the previous Environment Manager and SB has picked up this work by becoming both the Environment and Health and Safety Manager. SB's knowledge and experience of the site was well received by the inspecting officer during the site tour.

Following a visit in converting it is proposed that the next audit will look more closely at the management of dust across the mill. This work will also help with on-going sector objectives in respect of the proposed fire prevention at paper mills work. SB knowledge as Health and Safety Manager was also very useful as this area of work is both broad and wide reaching.

Sodium Hypochlorite (NaClO) Tank and Bund

The dust discharging into the secondary fibre yard from above the broke trimmings had collated in the bottom of the sodium hypochlorite tank bund and was wet and brown in colour. Since the last visit a structure had also been built on the side of the bund for placing intermediate bulk containers (IBC) on, when decanting sodium hypochlorite for use elsewhere in the process. This can be seen in the photograph bottom left. SB explained this activity is only undertaken by the most experienced staff on a certain shift. The photograph bottom middle shows a stop plate that has been installed just outside the bund to prevent a vehicle from driving too far into the structure while decanting. A discussion was had in respect of this activity and the pipework from the tank to the pulper (photograph bottom right) particularly where it enters

the corrugated cladding in the building as this is outside the bund and unprotected. Types of pipework and their preventative maintenance was briefly discussed with SB who explained was considered in the tank improvements. The inspecting officer would like to revisit this area of discussion during the next site audit.



Chemical Store or 'Jupiter Kitchen'

Leaving the secondary fibre yard and entering the chemical store for the paper machine or 'Jupiter Kitchen' it was immediately evident that the house keeping in this area had improved.



The store had been cleaned down however It was unfortunate that a spill had since taken place in the area. Absorbent pads were in place over the spill which looked like it had happened on a changeover of an IBC of softening agent rather than from a leaking pipe. KD enquired about the spill procedure on site and the 'clean up' of the agent. SB explained earlier in the audit that he has put a presentation together to raise further environmental awareness with the staff on site and this will be given soon.

The photograph opposite was taken in the chemical store. The damage to the bottom of the door which had also been discussed previously is not that clear in the photograph (light can be seen coming in through the damage at the base of the

door). Although the door was shut on inspection dust was also still coming in and this can be seen on the floor of the store in the photograph. Prior to the capital investment on the broke baler with dust filtration the operator has to prevent the accumulation of dust and a new door will help keep this area clean, preventing water ingress and dust filling the bund and coating the IBC's. The photographs below show the spill of softening agent in this location which needed to be cleaned up. SB agreed to follow this up immediately



after the NRW visit. The lattice in the floor of the store had also been lifted and the bunded area beneath cleaned out following the last NRW visit and this was evident. However water had since collected, but

again it was unclear where this had come from. NRW will re-visit this with the operator in the next audit following the operator's on-site training.

Action: Operator to investigate how the bund in the floor of the Jupiter Kitchen is filling up with water as this can compromise the capacity of the bund in this area.

During the last visit it was noted and raised with the operator that the storage of tissue cores appeared to block access to emergency services in the secondary fibre yard. SB had explained that concrete kerbs had been put in place either side of the services. The photograph below shows the temporary isolation of the services however a stack of cores had partially collapsed in front of the kerbed area. SB explained that this had been a problem and a permanent solution was being sought.



AOB

Objective 3 - To update the operator on the work of the EA Paper and Pulp Sector Group (EA, NRW and SEPA)

A discussion was had on the work of the Environment Agency (EA) Paper and Pulp Sector group on which NRW sit along with SEPA for consistency. Currently the main focus for the group is the paper mill permit reviews following the publication of the revised 'Production of Pulp, Paper and Board' Best Available Techniques (BAT) Document at the end of September 2014. However a brief discussion was also had on an area of work the sector group is looking at in respect of the Paper and Board Industry Advisory Committee (PABIAC) Paper Mills Guidance on Fire Risk

<http://www.hse.gov.uk/pubns/web08.pdf>

At a meeting between the CPI, Industry regulators and mill representatives' discussions were had on the Paper and Board PABIAC guidance on fire risk. The guidance was recently significantly reduced from what the industry considered a useful 41 page document to a 9 page generic guide.

At a paper and pulp sector group meeting the possibility for the development of a minimum set of standards was discussed which would be useful if adopted by paper mills across the UK for the prevention of fires.

It is understood that this subject is wide reaching, so currently initial talks have taken place with the CPI, industry volunteers (England and Wales) EA and ourselves on a proposed approach. The CPI have subsequently met with industry representatives to discuss the revised PABIAC guidance which was an action arising from initial talks.

Objective 4 – To update and discuss the combustion activities at the paper mill and the inclusion of the gas fired hood in the aggregated rated thermal input (MWth)

During a previous visit (please refer to CAR 5027 dated 28 March 2013) it was discussed with the then operator that a review was taking place by the EA paper and pulp sector group, of combustion activities at all mills across England and Wales. At that time the EA considered that this included the gas fired hood within the aggregation rules under Part A (1) of the Environmental Permitting (England and Wales) Regulations 2010 (as amended). This led to an action being placed on the Bridgend mill for an up to date schematic to demonstrate the net thermal input of each appliance so the aggregated rated thermal input of the combustion activities operated on site.

An updated schematic was provided which suggested that the aggregated net thermal input was greater than 50MWth. Clarification has also recently been made in respect of the aggregation rules and the inclusion of the hood. The Regulatory Guidance Series (RGN2) was revised in May 2015 to reflect the changes brought about by the Industrial Emissions Directive. Under Section 1.1.9 d (page 22) of the following:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/435475/LIT_6529.pdf it states that combustion plant used for drying purposes is included in the overall aggregated site capacity when determining if a site comes under Part A(1) of the Environmental Permitting (England and Wales)

2010 Regulations (EPR) . The inclusion of the hoods in the aggregation is being applied to the mills in Wales for consistent regulation.

What this means for the Bridgend mill is that the combustion activity with a net rated thermal input of 50 megawatts or more (EPR Section 1.1 Combustion Activities Part A (1)(a)) is a separate listed activity. The permit for the site will need to reflect this. In turn this will impact on the operators Operational Risk Appraisal OPRA score and annual subsistence. It is expected that the inclusion of the listed activity will be made to the operators permit in the forthcoming permit review unless the operator can demonstrate that the net thermal capacity with the inclusion of the gas fired hood is less than 50MWth.

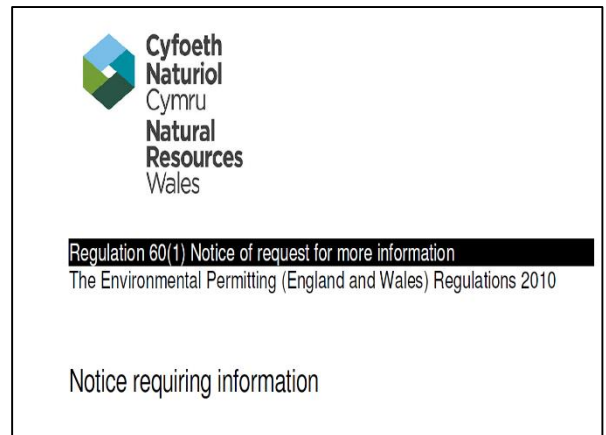
Action: Operator to confirm to NRW through the provision of the most up to date schematic of the net thermal input (MWth) of each appliance to determine the aggregated thermal capacity at the Bridgend mill with the inclusion of the gas fired hood.

Objective 5 - To provide an update on the permit review process and the operator's response to the Environmental Permitting Regulations (EPR) Regulation 60(1) Notice Requesting Information.

The mechanism by which we review a permit on publication of a revised Best Available Technique (BAT) reference document or Bref is by issue of an EPR Regulation 60(1) Notice requesting information.

Under the notice the operator is required to inform NRW how they perform against each BAT conclusion and where they currently do not meet the standard explain how they propose to do so within 4 years of the anniversary of the publication of the BAT reference document or Bref.

KD advised that the operator's response to the Environmental Permitting Regulations 60(1) Notice for further information has been reviewed. The response was found to provide the information required to progress with the review. There were just a couple answers that required some further information /clarification and this will be requested from the operator shortly by letter.



Conclusion

This was the first audit that was undertaken with Steve Barwick the new Environment and Health and Safety Manager following the departure of Richard Lewis who was the sites Environment Manager. The main aim of the visit was to review the action / recommendation table with the operator from the previous audit as unfortunately there had been no handover in respect of the Environment Manager role. A number of the actions had been complete however there is work on-going which is associated with capital investment projects. One such programme relates to the minimisation of dust on site. NRW considers this to be a key environmental improvement as the accumulation of dust can be a fire risk and has been a problem both in converting and the secondary fibre yard. It is proposed that the management of dust is looked at in a future audit which is proposed for Q3 2015 along with the spill procedure, drainage works and associated staff training.

[End]

	EPR Compliance Assessment Report	Report ID: 5908
This form will report non-compliance with your permit as determined by an NRW officer		
Site	Bridgend Paper Mill	Permit
Operator/ Permit	Northwood and Wepa Ltd	Date
		EP3738NG
		8 July 2015

Section 3- Enforcement Response		Only one of the boxes below should be ticked	
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.			
Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.		☐	
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.		☐	
We will now consider what enforcement action is appropriate and notify you, referencing this form.		☐	

Section 4- Action(s)			
Where a non - compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
		Operator to review the on-going actions in the above table. It is proposed that these will be revisited at the next audit to assess progress.	Q3 2015
NA		Action: Operator to investigate how the bund in the floor of the Jupiter Kitchen is filling up with water as this can compromise the capacity of the bund in this area.	8 August 2015
NA		Action: Operator to confirm to NRW through the provision of the most up to date schematic of the net thermal input (MWth) of each appliance to determine the aggregated thermal capacity at the Bridgend mill with the inclusion of the gas fired hood	8 August 2015

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 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 which 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 Natural Resources Wales (NRW) to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). 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 (e.g. 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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

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

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 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 the officer's line managers. 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) 601 0987**.