



EPR Compliance Assessment Report

Report ID: BT4885IT/0193574

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

Site	Shotton Paper Mill		Permit Ref	BT4885IT	
Operator/ Permit holder	UPM-Kymmene UK Ltd				
Date	11/11/2013		Time in	10:00	Out 13:00
What parts of the permit were assessed	All relating to waste wood imports.				
Assessment	Audit	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	P Walmesley / P Watts				
Officer's name	Alison Soper, Louise Peel		Date issued	17/12/2013	

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)	C3	3.2.1
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	A	
	2. Management system & operating procedures	A	
	3. Materials acceptance	C4	2.3.10
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	A	
e) Emissions	1. Air	A	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	NA	
	5. Waste	A	
f) Amenity	1. Odour	A	
	2. Noise	A	
	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	A	
	3. Maintenance records	N	
	4. Reporting & notification	A	
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 (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	2	Total compliance score (see section 5 for scoring scheme)	4.1
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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 report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Audit of waste wood management

Breach of permit condition 3.2.1 - There is no containment of run off from the wood storage and processing area. Article 8 of the Waste Incineration Directive states that Incineration plant sites, including associated storage areas for wastes, shall be designed and in such a way as to prevent the unauthorised and accidental release of any polluting substances into soil, surface water and groundwater. Also, that storage capacity shall be provided for contaminated rainwater run-off from the site or for contaminated rainwater arising from spillage or fire fighting operations.

Defra guidance on the Incineration of Waste gives further details of the requirements and the risk assessment process that should be used to determine the volume of storage that would be required. An assessment of the needs for the UPM site should now be carried out and submitted to Natural Resources Wales by 31 January 2014.

Breach of condition 2.3.10 - Waste acceptance. Some details were missing from the annual transfer notes. (see below)

Observations:

The management of waste wood at UPM Shotton is contracted to UPM-Tilhill. They are responsible for incoming waste and non-waste wood fuels for the boiler. UPM-Tilhill has its own management system certified to ISO 14001. There are quarterly meetings with UPM and also regular contact with the on-site management.

A computerised system - Raw Materials Purchasing and Supply System, is used to monitor the incoming materials. All waste wood is brought in under contract and must meet a defined specification, as described in the Accepted Waste Specification document. The UPM-Tilhill manager visits all suppliers before contracts are awarded to explain the specifications and acceptance procedures. Only grade C or better waste wood is accepted.

Delivery notes are issued for each load received which can be tracked through the computer system for waste type, carrier and supplier. The driver will have a transfer note which may, or may not contain all the details, a weighbridge ticket records the amount and these three documents together comprise the record to meet Duty of Care requirements. Suppliers also have annual waste transfer notes with the complete details on.

During the audit a small selection of controlled waste Duty of Care transfer notes for waste wood received at site were assessed for compliance. We were informed that annual waste transfer notes were in place for all suppliers of waste wood, which were not available during the audit. These were sent separately following the audit and received on 12/12/13.

The annual waste transfer notes were assessed for compliance, and the following observations have been made:

Worldcare Wales

- Dated 01/01/2013 only and therefore cannot be considered an annual waste transfer note
- The waste carriers' information is missing
- The UPM Tilhill permit number is missing
- The note is not signed by a representative of UPM Tilhill.

During the audit, a waste transfer note for Worldcare Wales, dated 10/09/13, was checked and the EWC code, waste hierarchy declaration and permit number were missing. On this basis, we have concluded that the waste transfer notes for waste received from Worldcare Wales are not compliant and recommend action is taken to ensure UPM Tilhill comply with your Duty of Care requirements.

Gwynedd Skip and Plant Hire

All information appears to be in place for the waste transfer note dated 16/11/12 to 15/11/13. Please be reminded that this note was due for renewal on 16/11/13 and ensure all information is included on the new note.

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The annual waste transfer note checked was dated 01/01/13 to 31/12/13

- The UPM Tillhill permit number is missing
- The EWC code is stated 17 02 01 – this may need revising as waste wood from waste transfer stations is normally coded under the Chapter 19 waste code (not Chapter 17, as above).

Gwynedd Council

The annual waste transfer note checked was dated 18/11/13 to 31/12/13

- The UPM Tillhill permit number is missing

CB Environmental Ltd

The annual waste transfer note checked was dated 01/01/13 to 31/12/13

- No issues observed.

The waste carriers' licences are checked monthly by UPM-Tilhill to ensure they are up to date.

If a load arrives which doesn't meet the specification it will usually be rejected and returned to the supplier. Site operatives are trained in what to look for during the delivery inspections. The supplier will then be visited and the issues explained to try to prevent a recurrence. Deliveries are managed to try to balance site requirements against availability; there is natural fluctuation depending on construction sector activity which means that, particularly in the winter, reserve stocks are needed to cover the quieter times. There is generally about 10,000 tonnes of waste wood on site at any time, with up to 800T per day being burned. The boiler manager liaises closely with UPM Tilhill to keep suppliers informed of planned boiler shuts when deliveries may be reduced or stopped.

North Wales Fire Service have visited to give advice on fire prevention and further awareness visits are planned. There was uncertainty over whether a plan had been prepared with the fire service. UPM's on-site fire teams provide a first response and practise regularly.

Waste return documentation lists the region of origin rather than every local authority as many loads are bulked up at transfer stations and it would be impractical to identify the source of all the wood.

Visual inspection

Two mobile shredders were in use at the time of the inspection. It is hoped to be able to significantly improve the process with further investment to install permanent shredders and better metal removal equipment. Non-ferrous metal is a major cause of problems in the boiler bed and has led to shut downs. The improvements would also reduce the potential for dust from the activity.

The stockpiles of unprocessed and processed wood were quite large, but with reasonable gaps between them. The chipped wood was steaming slightly. It is important to keep using the chipped wood in rotation to minimise the risk of fire. Current practice ensures that nothing is left for more than four months.

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		BT4885IT 11/11/2013

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.		X
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 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			
B3	C3	An assessment shall be made of the storage capacity needed to contain contaminated run-off or fire water from the wood storage and processing area. This should be in line with Defra's guidance document on the Incineration of Waste (Section 4.4)	31-Jan-2014
C3	C4	UPM Tillhill must ensure that all information is included in an annual/single load waste transfer note, including the permit number, and it should also be signed by a representative of UPM Tillhill. An annual waste transfer note, with all information completed, should be put in place for Worldcare Wales immediately. All waste transfer notes due for renewal must be reviewed and checked to ensure all information required is included.	31-Dec-2013

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 the Natural Resources Wales (NRW) to fulfill 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 (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.

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 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 607 0987.

