Cyfoeth Naturiol Cymru / Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: BT4885IT/0183118				
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	19/06/2013		Time in	10:00	Out	14:00
What parts of the permit were assessed	Activities relating to WID boiler operation					
Assessment	Site Inspection	EPR Activity:	Installation X	Waste Op	Water Discharge	
Recipient's name/position	Peter Walmsley					
Officer's name	Alison Soper, Paul Wright		Date issued	08/07/2013		

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	A		
	2. Closure & decommissioning	N		
	3. Site drainage engineering (clean & foul)	A		
	4. Containment of stored materials	A		
	5. Plant and equipment	A		
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	N		
	4. Sewer	N		
	5. Waste	N		
f) Amenity	**1.** Odour	N		
	2. Noise	N		
	3. Dust/fibres/particulates	N		
	4. Pests, birds & scavengers	NA		
	5. Deposits on road	NA		
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 (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

If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

	INITIALS	DATE
OK FOR PUBLIC REGISTER	AS	5/8/13
COPIED TO PUBLIC REGISTER	JB	EDRM

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 completed within 14 days of an assessment.

Site inspection of activities relating to the WID boiler.

Update on work carried out during April shutdown. The maintenance shut was started early due to problems with the fluidised bed affecting combustion. Investigations found a large number of blocked nozzles so all have been changed. Work is ongoing to determine the root cause of the blockages. Other work was carried out as planned, but overall the shut lasted considerably longer than expected so sludge and wood built up on site as production continued with the gas and oil fired burners providing steam.

There is currently about 9000T of sludge stockpiled on site. Some of the non-biomass sludge is being sent for animal bedding and landspreading outlets are being sought for some of the biological sludge, but it is hoped that most will be burnt on site over the next two months. The stockpile is being reduced at a rate of about 200T/day. There is also some 6000T of wood on site awaiting chipping. Incoming waste wood was completely stopped for a while to reduce stock, and will be kept at lower until the backlog is reduced. This has not been recorded as a permit non-compliance, but it is not advisable to allow sludge or wood to build up to this extent.

If wood is to be chipped for off site use a permit variation will be required. >75T per day will be a Section 5.4 A(1) activity.

SRF is being brought in from the two agreed producers. The air and water emissions monitoring was delayed by the extended boiler shut but has now been carried out and results will be provided to NRW on reciept on the contractor's report. Analysis and WAC testing of the fly ash has also been carried out for the new fuel source; the bottom ash will be tested once the new boiler bed has become established towards the end of June. The CEMS have shown no change since the introduction of the SRF and it is expected that the full emissions analysis will be similar as levels of SRF are kept low to minimise the generation of HCl to protect the boiler.

The project to produce a fibre-rich SRF from RCF residues is now appearing successful and material is being returned to Shotton for burning. This material meets the site specification for SRF and is being tested to the relevant BS in the same way as the other SRF for moisture content and CV.

A section of the bag filter was changed during the April shut as part of the new rolling programme of bag changes. This has improved the dust load pre-scrubber. WID requires emission limits to be applied at the point of discharge from the scrubber ETP (Article 8) as listed in table S3.3 of the permit. The table includes Total Suspended Solids, Metals and Dioxins/furans, but not pH. pH, temperature and flow must be monitored continuously but no limits are prescribed. There is an error in the reporting form where it includes emission limit values. It is acceptable under WID to demonstrate compliance with the ELVs for the scrubber effluent by calculating the proportion attributable to this effluent from the total treated effluent from the main ETP. This would require the parameter to be monitored at the outlet of the scrubber, the "rest of the process" input to the ETP, and at the discharge from the ETP at the frequencies prescribed in WID. Then the scrubber emission can be calculated pro-rata. Further guidance can be found in Defra's "Guidance on Directive 2000/76/EC on the Incineration of Waste".

Ash is being disposed of to three permtted sites. All have been audited to ensure compliance. Further trials into alternative uses are ongoing.

If Biospikes are to be used on a regular basis to control sludge levels in Lagoon 3 a change in operation request will beed to be submitted for agreement.

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Operator/ Permit	UPM-Kymmene UK Ltd	Date	19/06/2013

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			

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.