

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

Site	Shotton Paper Mill EPR/BT4885IT	Permit Ref	BT4885IT		
Operator/Permit holder	UPM-Kymmene UK Ltd				
Regime	Installations				
Date of assessment	27/02/2018	Time in	10:00	Out	15:00
Assessment type	Site Inspection				
Parts of the permit assessed	All				
Lead officer's name	Kelk, Matthew				
Accompanied by	Challender, Paul, Peel, Louise				
Recipient's name/position	Andrew Bronner/ Head of Energy and Operational Support	Date issued	28/03/2018		

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
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C2 - General Management - Management system and operating procedures	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
E1 - Emissions - Air	A	
E3 - Emissions - Surface water	A	
E5 - Emissions - Waste	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	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

A site inspection was undertaken on 27 February 2018 by Industry Regulation Officer Matthew Kelk and Louise Peel and Paul Challender from the Waste Regulation Team. Also present were Geriant Hughes and Sharon Bouckley Fire Officers from North Wales Fire and Rescue Service.

1. Fire Risk

A full site tour was carried out in the morning in particular looking at areas of potential fire risk and upon completion the NWFR Officers were shown the fire prevention plan for the wood area. NWFR had the following comments to make following the visit:-

"Walk through of site undertaken to include wood yard, MRF facility, waste paper storage, boiler No7 and bulk chemical store.

FPP presented for observation - review at the time identified some matters which were drawn to the site managers attention - not clear how the site would deal with a hot load if one was delivered to site.

Advice provided on reducing stock piles of wood (maybe into piles equal to daily throughput).

Provided drainage plans could be clearer, information as to what would prompt a review should be included.

Although not forming part of the FPP consideration should be given to identifying a quarantine area for the MRF/RCF".

It is recommended that the FPP is regularly reviewed against the current NRW Fire Prevention and Mitigation guidance, which is version 2 published August 2017. The version is subject to change as the guidance is updated, therefore please refer to NRW's website for the most up to date guidance.

2. Waste

Geoff Edge ran through the sampling regime for the MRF site. It was pointed out in a few areas where the Code of Practice sampling rate had been narrowly missed, for example for incoming waste from certain suppliers and for outgoing loads of cardboard. It was explained that the sampling regime is generally planned with the incoming load known for each quarter. On occasion extra unplanned loads may come in at the end of a sampling period and as such it will cause the site to narrowly miss the sampling rate for that quarter. Extra sampling is then carried out the next quarter to catch up. No compliance score given as in overall in a year the sampling rate is high.

Contamination rates within the outgoing waste streams were discussed, in particular some loads were above 1.5% industry standard. This is due to either the incoming waste being too highly contaminated or hand picking not being carried out. Waste suppliers have been contacted regarding the incoming contaminated waste, but the MRF plant does not have the capacity to reduce to 1.5% rate when dealing with higher contaminated waste streams.

Export of waste from the MRF plant was discussed in particular to Non UK destinations, Geoff Edge confirmed that where non UK destinations are listed on the quarterly waste returns the final destination is always within the EU. There are no exports of waste to China. Any waste loads that are directly sent for export from site are sealed on site and photographs taken. All waste exports are organised by the internal sales team.

The final destination of residual fines was discussed and Kevin Smith ran through spreadsheet showing this and the spreadsheet has been supplied to NRW.

3. COMAH

The Control of Major Accident Hazards 2015 was discussed, site does not hold quantities of substances that would fall under the regulations.

Action

Site to provide an inventory of chemicals held on site by 27 April 2018

4. Q4 Monitoring/Annual Returns

Emissions to Air

Q4 (October - December 2018) CEMS monitoring data reviewed for emissions from Boiler no.7 (point A20), emissions monitored for PM, HCl, TOC, CO, SO_x and NO_x, noted all emissions are below permitted ELV's. Standby Boilers measured for NO_x, point A15 and A17, emissions below permitted ELV's.

Ash Composition

Q4 ash composition reviewed, LOI is below permitted allowance.

Emissions to Sewer and Surface Water

Q4 monitoring reviewed for emissions from point E1 and W1. All emissions to water both sewer and surface water below permitted discharged limits from permit BT4885IT.

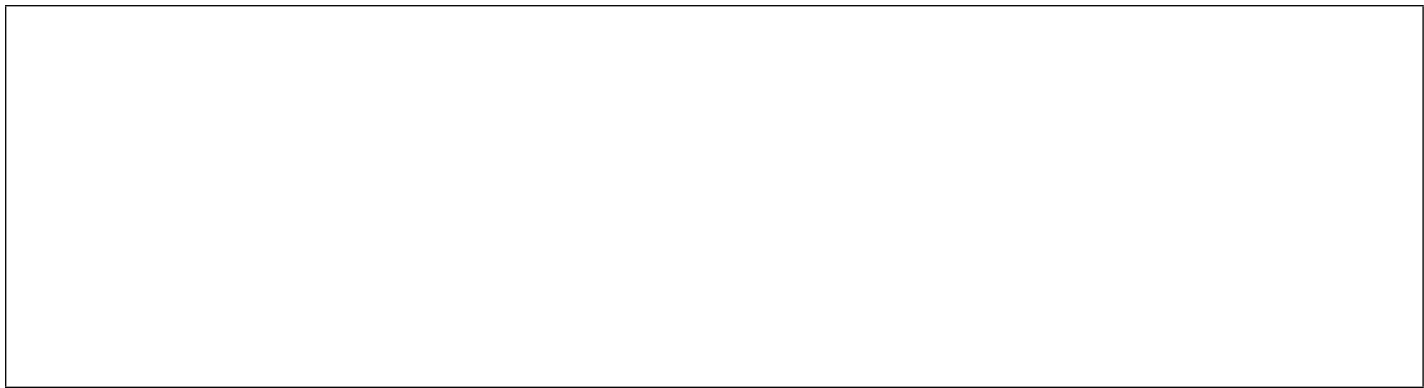
Hazardous Substances Surface Water Screen

No issues with submitted data.

Performance Parameters and IED Chapter IV Report

Action

Please provide data for performance parameters for Q4 and the IED Chapter IV report (condition 4.2.2(d)) by April 27 2018.



EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033089**

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Operator/Permit holder	UPM-Kymmene UK Ltd	Date	27/02/2018

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.