

Compliance Assessment Report

Report ID:
CAR_NRW0031960

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	13/07/2017	Time in	10:00	Out	16:00
Assessment type	Site Inspection				
Parts of the permit assessed	All				
Lead officer's name	Kelk, Matthew				
Accompanied by	Sowerby, Andrew R.				
Recipient's name/position	Andrew Bronnert/ Head of Energy and Operational Support	Date issued	04/08/2017		

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
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C2 - General Management - Management system and operating procedures	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
E1 - Emissions - Air	A	
E3 - Emissions - Surface water	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

An inspection was carried out by Natural Resources Wales (NRW) Industry Regulation Officer Matthew Kelk and Waste Regulation Officer Andrew Sowerby on 13 July 2017.

The following issues were discussed during the inspection:-

Improvement Condition (IC5)

During the inspection, a telcon was held with John Sanderson, Head of Environment, UK and Ireland. Discussions were held around the hazardous substances screening exercise and the progress made to date. There has been some difficulty where limit of detection (LOD) is above the screening value for some determinants and finding an accredited lab that can test to a lower LOD. This appears to be an industry wide problem. UPM are to forward to NRW the list of determinants that are an issue.

NRW take the view that if an accredited lab cannot be found to test to a lower LOD, then site are to provide documentary evidence how that pollutant cannot enter their effluent discharge to surface water.

Action

UPM to send list of determinants to NRW where LOD > screening value.

MRF Fire Investigation

Investigation has been sent to NRW on MRF fire in March 17.

Site gave briefing on the the investigation from the fire located within the MRF building that occurred in January 2017. Source - was unknown, but it is thought that it was a battery in the residue pile. UPM have written to all councils to try and minimise batteries coming to site within the co-mingled recycling.

Fire tracked along conveyors, sprinklers and detection within this area. The upper conveyor unfortunately covered the lower conveyors from being fully doused by the sprinkler system. FRS attended site along with onsite fire fighting team.

Off the back of the fire investigation several improvements have been made to this area, further sprinklers have been installed directly above the residue pile.

Further to this IR cameras have been fitted to this area - along with alarms which will detect if any excess temperatures are detected within the residue pile.

All firewater's were contained within the MRF area and fed into the site ETP.

Accident and Emergency - Site Drainage

Site engineers and/or managers are on call in an emergency who have detailed knowledge of the drainage system. Drainage plans are also located on computer systems across site.

It was discussed that some NRW regulated EPR installations use a 'Battle Box' that is kept within security containing documents useful to the FRS such as drainage plans.

UPM consider that their approach is fit for purpose.

Advice and Guidance

NRW recommends that UPM should be mindful that in the case of a power outage/ data network loss that computerised versions of drainage plan may not be available and to have suitable backup to cover this eventuality.

Containment Procedure - Rainwater Pumping

Discussions were held around the review of rainwater pumping from the RCF chemical sump highlighted in inspection December 2017.

Briefing of investigation sent to NRW 14 July 2017 - investigation has been carried out, pump away system faulty, mobile system

was being used at the time and area had not been emptied.

Pump has now been repaired and staff trained in importance of emptying sump of rainwater.

Stacking Bunding System

Discussion around stacking IBC bunding units and whether these would provide adequate containment. This has been reviewed and it considered that if the most likely failure mode would be from a valve or misplaced transport cap. This would cause leakage straight into the bund below. Additionally UPM believe risk to environment to be low, as any puncture to upper IBC and overspray would be caught by mill drains which lead directly to the onsite ETP and can also be directed to an overspill facility.

Fire Prevention Plan

An update was given on fire prevention plan work. Further work is being carried out by RPS consultants to look at fire prevention risk assessment for other areas of the plant to the woodyard.

NRW has recently had a member of staff from the North Wales Fire and Rescue Service seconded to them and would like to carry out a fire prevention audit at a future date in 2017.

New Plant

Future proposals for a large battery cell with a capacity of 50MW and 2 x 40 MW gas engines to be installed on site. It was discussed that the environmental permit will need to be varied to include the gas engines as they fall under a listed activity under the Environmental Permitting Regulations (England and Wales) 2016.

EPR Compliance Assessment Report

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Operator/Permit holder	UPM-Kymmene UK Ltd	Date	13/07/2017

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.