Cyfoeth Naturiol Cymru / Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: BT4885IT/0190146

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	24/09/2013			Time in	13:15	Out	15:30
What parts of the permit were assessed	Materials recovery facility						
Assessment	Site Inspection	EPR Activity:	Installation X	Waste Op		Water Discharge	
Recipient's name/position	Peter Walmsley / Geoff Edge						
Officer's name	Alison Soper			Date issued	02/10/2013		

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	A		
	2. Management system & operating procedures	A		
	3. Materials acceptance	A		
	4. Storage handling, labelling, segregation	A		
d) Incident management	**1.** Site security	A		
	2. Accident, emergency & incident planning	A		
e) Emissions	**1.** Air	NA		
	2. Land & Groundwater	NA		
	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	A		
	5. Deposits on road	NA		
g) Monitoring and records, maintenance and reporting	**1.** Monitoring of emissions & environment	NA		
	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		21/11/13
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.

UPM - Peter Walmsley, Simon Walker, Geoff Edge

No breaches of permit were observed.

General observations:

1. Management
UPM has undergone restructuring which has brought both the MRF and the recovered paper procurement (RCF) into the Paper Manufacturing department. This has simplified the lines of management and communication.
Management of operations has improved over the past 12 months to ensure that all paper work is completed correctly. Duty of Care audits are carried out with suppliers and a new system of transfer notes is to be introduced as the local authorities do not always complete all the necessary information. This will link in with the SAP system currently used for financial purposes. Annual transfer notes will be used where possible and individual loads will be tracked with a bar code system. A hand-held logger is being introduced to simplify the data handling; when fully operational this will allow the details of each load to be entered into the system as the load is accepted.

2. Training
Two members of the MRF management team have completed the basic requirements for the Certificate of Technical Competence and are continuing to work towards the advanced requirements. This has helped improve the understanding of relevant waste legislation and the wider responsibilities to ensure that the requirements are met throughout the chain from producer to disposal or recovery point. Regular refresher training will be needed to maintain this level of competency.

3. Waste acceptance
A weekly prediction report is produced to help with planning, and a daily inbound stock report is provided to the RCP managers. The MRF is running 24/7 and can process faster than material is accepted which reduces the likelihood of building up too much stock. All incoming loads are individually identified so that they can be tracked back to the local authority if there are any problems. Two quality control checks are carried out on each load; QC1 as the doors are opened to check that the waste is generally as described, and QC2 to check for the amount of contraries within the load. This information is recorded and can be provided to the supplier. An excess of contraries will result in a warning and unacceptable loads will be returned. There is an indoor quarantine area if needed for waste that needs to be re-loaded and returned, or otherwise disposed. Controls at the acceptance end help to keep the quality of the final output high.

Testing is carried out on one load in ten. A 250-300kg sample is taken and sorted fully with all streams weighed and categorised. This information is provided to the suppliers.

4. Contingencies
Emergency storage provision is available in the RCF warehouse for up to 72 hours worth of deliveries. For planned shutdowns reciprocal arrangements have been made with a number of other MRFs around the country to take the waste in.

5. Maintenance
There are autonomous checks during each shift to check motors etc whilst running. There is a daily 80 minute maintenance stop when limited cleaning is also carried out. A weekly 8 hour shut occurs every Thursday for routine maintenance and cleaning, and it is anticipated that a 3 day annual shut will be needed ongoing. There is 24 hour maintenance cover on the wider site. Dust removal is one of the main

areas of concern, the extraction system works well, but additional cleaning is needed to minimise the fire risk. The belly pans beneath the conveyors have been removed to prevent material build up in these areas, and the floor area beneath has been fenced off for safety reasons.

The minor fire which occurred in the summer was thought to be due to a build up of heat in material scraped around the yard during cleaning. The procedure has been changed to keep this waste outside for a length of time before processing. The fire water was absorbed within the waste in the building. The internal area is designed to store water and the main yard will drain to lagoon 3 via an interceptor.

Residues are stored in segregated areas on the yard for onward disposal. This is managed by the on-site waste contractor within the utilities department.

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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 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.