Compliance Assessment Report

Report ID:
CAR_NRW0026703

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	15/11/2016	Time in	09:00	Out	17:00
Assessment type	Audit				
Parts of the permit assessed	MRF audit				
Lead officer's name	Kelk, Matthew				
Accompanied by	Ellis, Rhys				
Recipient's name/position	Andrew Bronnert / Head of Energy and Operational Support	Date issued	20/01/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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**
A1 - Infrastructure - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C1 - Infrastructure - Staff competency/training	A	
C2 - Infrastructure - Management system and operating procedures	A	
C3 - Infrastructure - Materials acceptance	A	
C4 - Infrastructure - Storage, handling labelling and Segregation	A	
E5 - Infrastructure - Waste	A	
G1 - Infrastructure - Monitoring of emissions and environment	A	
G2 - Infrastructure - Records of activity, site diary/journal/events	A	
G4 - Infrastructure - Reporting and notification to Natural Resources Wales	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

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 audit was carried out at UPM Shotton Materials Recovery Facility (MRF) on the 15 November 2016 to assess compliance against the reporting and sampling requirements for MRF under the Environmental Permitting Regulations (EPR). The plant is required to report on the quality of the incoming and outgoing material to the MRF due to processing of over 1000t/year of mixed dry recyclables.

Geoff Edge UPM MRF Manager was present throughout the audit.

<u>Inbound Waste</u>

MRF manager verbally ran through the site process. The site has 3 quality control procedures which relate to inbound material, these were provided to NRW for review.

MRF QC1 Procedure - this is the initial check that is made when the inbound waste is received to site - the doors of the lorry containing the incoming waste are opened and the load is visually checked to see whether it is comingled material and whether any non recyclables are present.

MRF QC2 Procedure - vehicle is unloaded and the MRF operatives walk the load and look for any non conforming materials that are visible, e.g. black bin bags, sharps, batteries etc. The rejected non recyclable items are noted and if the number is greater than 40 items the load is rejected.

MRF1 QC3 Inbound Procedure - details how to take an inbound sample.

The site measures the composition of the incoming waste at a rate of 1 sample per 125 tonnes for each supplier per the requirements of the EPR regs. To determine the 1 in 125 tonne rate, SAP details of the incoming waste loads are moved to a sampling schedule spread sheet. Depending on the weight of the loads the spread sheet will then flag up when a sample is due for each supplier. The sampling schedule can then be communicated to the supervisor of the inbound waste team.

Whilst the MRF manager and supervisors are aware of the input material sampling rate under the EPR regulations and the associated calculation methodology. There are no procedures that specifies the requirements for the sampling, sampling rates or how to calculate the sample rate using SAP and the aforementioned spreadsheet.

<u>Action</u>

To compile a procedure that details the input material sampling regime according to the EPR regulations and associated calculation methodology and report to NRW by 5 January 2017.

A separate sorting room is used to sort the incoming and outgoing waste samples. This was inspected during the audit. A standard operating procedure on how to carry out the sampling was on display of the wall of the sorting room.

A spread sheet containing the breakdown of the various components of the inbound waste from the each supplier was provided during the audit. The quantitates of target material, non target material and non recyclable were calculated as required. This is broken down into the target material in terms of glass and the various forms of metal, plastics and paper.

MRF plant manager showed paperwork of a random example of an incoming load of material and were able to show during the audit in relation to SAP records of incoming volumes of wastes how they meet the sampling requirements.

Records were checked and all weights of samples analysed for composition were above the 55kg required by the code of practice and the average well above the 60kg required.

<u>Outbound</u>

MRF 1 QC3 Outbound Procedure details the sampling procedure to take a sample of outbound material.

Evidence was shown of the plant complying with the sampling rates for outbound waste sampling. Code of practice sampling rates were displayed in a prominent position for glass, paper, metal, plastic sampling. This is sampled at glass - every 50 tonnes, paper every 60 tonnes, metal every 20 tonnes and plastics at a sampling rate of every 15 tonnes of material. Outgoing material sample rate is calculated and communicated to operators and the material is removed prior to being baled.

The sampling rates for outbound material and associated calculation are not written into any procedures.

Action

Sampling procedures should be compiled to include outbound material and calculation methods and forwarded to NRW by 5 January 2017.

Records were checked to ensure that minimum weights had been sampled for outbound materials, i.e. a minimum of 10kg glass, 50kg paper target material, 20kg plastic material and 10kg metal material. All outbound samples taken at the MRF were compliant with the minimum weight specified.

Spread sheet records were shown for the sampling composition of the outgoing sorted waste and this is used to record the weights of the output material breaking it down into the various fractions e.g. glass, metal, paper and so on.

A random selection of sampling records was selected for the outgoing material. These were checked against the relevant bales of waste on site to ensure that the records match that of the outgoing material.

Cyfoeth Naturiol Cymru / Natural Resources Wales	EPR Compliance Assessment Report	Report ID: CAR_NRW0026703

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Operator/Permit holder	UPM-Kymmene UK Ltd	Date	15/11/2016

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.

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.

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 reports 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 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.