



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 | 14/07/2014 | Time in | 13:00 | Out | 16:00 |
| What parts of the permit were assessed | Effluent plant + general update | | | | |
| Assessment | Site Inspection | EPR Activity: | Installation: X | Waste Op: | Water Discharge: |
| Recipient's name/position | Peter Walmsley | | | | |
| Officer's name | Alison Soper | | Date issued | 06/08/2014 | |

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

| 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 | NA |
| 3. Surface water | N |
| 4. Sewer | NA |
| 5. Waste | N |
| 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 | 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, O = Ongoing non-compliance – not scored

| | | | |
|------------------------------------|---|---|---|
| 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

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 normally completed within 14 days of an assessment.

Water efficiency audit report

The draft report for the water efficiency audit was discussed, in particular the recommendations. These are included to promote best practice and many have been included as generic for all audited sites. No instances of non-compliance were observed during the audit; however one key recommendation is to calculate the specific water consumption figure at 6% moisture.

Waste wood processing

The activity of chipping waste wood for sale or use off site requires a bespoke waste activity permit. The fee will be based on a Waste OPRA spreadsheet for this activity as a stand-alone activity. At present there is no mechanism within the charging scheme for Installations to include waste activities, so although the activity will be included on the EPR Permit it will be charged as a separate activity, in the same way as the MRF. The work to install the plant is planned for September and improvements to the surface water drainage system will also be made at this time. Proposals and plans for this work have been provided and agreed at a previous meeting. A mist canon is being trialled for dust suppression and has been very successful.

Waste Management

Some ash is still going to hazardous waste landfill, but a number of loads are going for recovery each week and other outlets are being sought. Bottom ash has also been re-classified as hazardous due to the pH of the dust fraction. A sample is taken from every 800T of ash for testing with results being held by the landfill operator. The ash is being transferred directly rather than through an intermediate company.

Some 1500T of non-biological sludge is being sent to be processed into animal bedding each month, but the majority is being burnt in boiler 7. The current mix of sludge, waste wood and RDF is proving a good balance and is unlikely to change. The suppliers of RDF have been audited

The off-site recovery process for RCF wastes has been stopped as it is not viable, but consideration is being given to setting up an operation on site to treat the residuals from the MRF and produce a fuel. This may require a variation to the MRF part of the permit depending on what the new treatment involves.

Site operations

Only one paper machine running at present due to production requirements. Control of the effluent plant has been adjusted to cope with the reduced flow in accordance with standard operating procedures.

Boiler 7 was down for a few days at the end of June to replace a failed soot blower and there was also an exceedence of the half hour CO limit on 13th June following a blockage in the fuel feed. The bag plant is now running continuously with bags being changed by contractors during shut downs rather than on the previous ad-hoc basis. This appears to be resulting in less carry through of ash into the scrubber as the TSS levels are now compliant in E1.

Effluent plant

A caustic leak in the RCF plant entered the plant drain and upset the effluent plant. The COD was monitored and although it was within the usual operating limits, the BOD rose above the discharge limit. The action triggers for COD have been lowered to prevent a recurrence of this event. Other than this the effluent plant has been running well achieving about 25 to 30 ppm solids from the secondary clarifiers. The oxygen dissolution in the activated sludge lagoon is much better and there has been no bulking of sludge or filamentous upsurge recently. The sludge level in Lagoon 3 has remained low, but biospikes may be used again in future if it starts to rise again.

Breaches of emission limits have been recorded on a separate compliance report covering all monitoring from January to June 2014.



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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.