

Compliance Assessment Report

Report ID:
CAR_NRW0026476

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	23/09/2016	Time in	10:00	Out	16:00
Assessment type	Unknown				
Parts of the permit assessed	All				
Lead officer's name	Kelk, Matthew				
Accompanied by					
Recipient's name/position	Andrew Bronnert/ Head of Energy and Operational Support	Date issued	22/11/2016		

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
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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 on site by Industry Regulation Officer Matthew Kelk on 23 September 2016.

The following issues were discussed during the inspection:-

Condensing Turbine

A new condensing turbine and associated cooling towers are currently being installed on site which will provide the site with approximately an extra 5MW of power. Impacts to air from these changes are considered to be minimal. It should be noted that impacts from noise and vibration should be assessed. This may involve a variation to your permit.

Paper 1 Line Removal

Due to the decommissioning of paper line 1 and associated equipment, it was discussed whether this should be removed from the permit, although this would only involve a change to the process description. This change will be made at the next variation.

The removal of the paper line will have an effect on the EPOPRA baseline score. It would be prudent for UPM to review their latest EPOPRA and resubmit to NRW.

Improvement Conditions

Improvement Condition 5

Improvement condition 5, site asked about the screening methodology for this condition due to the COSSH system used on site would inhibit a hazardous substance/s coming onto site. Following email conversations with John Sanderson at UPM post inspection, further clarification has been given regarding the screening process via email on 30 September 2016. An extension to the deadline for this condition has been granted and set as 30 November 2016.

Improvement Condition 6

Smith Grant are putting together a protocol for groundwater sampling

Article 16(2) of IED states that 'monitoring shall be carried out at least once every 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination'.

UPM are using a systemic risk of contamination for monitoring, email sent to John Sanderson 30 September 2016 explaining that the sampling strategy should be based on a conceptual site model (CSM) and any known spillage locations. It was also advised that the CSM will need updating due to a number of changes to the process on site since the original PPC application and baseline survey. Deadline extended until 30 November 2016 for submission of the monitoring protocol.

Improvement Condition 7

On-going progress for submission by 31 March 2017 deadline.

Fire Prevention Plans (FPP)

Site gave an overview of the FPP compiled to date, rather than being a stand alone document, UPM have pulled

together all of their risk assessment/procedures relating to fire along with associated risk matrix.

RPS consultancy are carrying out a review of the FPP, to see if there are any improvements that can be made.

Suggested that the FPP could be an audit topic upon completion by RPS.

Waste

Kevin Smith ran through the wastes that are removed from site in the form of:-

APC residuals, Bottom Ash and Ink Sludge.

Ink sludge is sent by site to Envirosystems Ltd. The waste is then sent to various sites for drying, in particular for use as animal bedding. The sites are either permitted for this activity or hold a U8 exemption.

Waste tests are being carried out on bottom ash to establish the hazardous waste classification.

Action

1. Site asked to provide details of all permits and exemptions for sites taking ink sludge. To be forwarded to NRW by 28 November 2016
2. To confirm waste classification of bottom ash upon completion.

Site Walkover

A comprehensive site walkover was undertaken of the waste wood processing area and associated storage, ink sludge storage, effluent treatment plant, filter press house, boiler no.7 and control room and the paper line.

No issues were identified during the site walkover.

EPR Compliance Assessment Report

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Operator/Permit holder	UPM-Kymmene UK Ltd	Date	23/09/2016

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.

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.