

Name of site	Chirk Particle Board Factory	Operator / Permit holder	Kronospan Limited	Permit ref no.	BW9999IG, as varied
Officer	Ian Oakes	Date	7 March 2013	Area / office	North / Wales / Buckley
Activity	Organic Chems - S4.1A(1)(a)(ii) & (viii)	Time in/out	13:30 - 16:30	Event type:	<input checked="" type="checkbox"/> Routine <input type="checkbox"/> Incident <input type="checkbox"/> Other
Assessment type:	<input type="checkbox"/> Site inspection <input checked="" type="checkbox"/> Audit <input type="checkbox"/> Check monitoring/sampling <input type="checkbox"/> Report / data review <input type="checkbox"/> Procedure review				
Site life status:	<input checked="" type="checkbox"/> Operational <input type="checkbox"/> Pre-Operational <input type="checkbox"/> Post-operational				
Which part(s) of the permit were assessed? Operator Monitoring Assessment to surface water					

Compliance assessment summary

Key to completion: A = Assessed/Assessed in part (no evidence of non-compliance)		ATL = Approach to limit		Conditions breached	
NA = Not Applicable		N = Not assessed			
		1, 2, 3, 4 = CCS cat 1-4 breach			
a) Permitted activities	1				
b) Infrastructure	1	2	3	4	5
c) General management	1	2	3	4	
d) Incident management	1	2			
e) Emissions	1	2	3 A	4	5
f) Amenity	1	2	3	4	5
g) Monitoring and records, maintenance and reporting.	1	2	3	4	
h) Resources efficiency	1	2			

The breaches indicated above may constitute one or more offences. You should take immediate action to rectify each breach and return to compliance. You should prevent any repetition of the breaches. Breaches of conditions as indicated above can result in criminal prosecutions and/or suspension or revocation of a permit.

NB. IF THERE IS A BREACH, ONLY ONE OF THE FOLLOWING WILL HAVE AN 'X' PLACED IN THE BOX

We will now consider what enforcement action is appropriate.	<input type="checkbox"/>	At present we do not intend to prosecute you for the above offences. However, you are warned that this may change if further relevant information comes to light.	<input type="checkbox"/>	This is a site warning.	<input type="checkbox"/>
				We have given you advice.	<input checked="" type="checkbox"/>

Review of Directly Applicable Legislation: Key: A = Assessed, N = Not assessed, NA = Not Applicable, C1, C2, C3, C4 = CCS cat 1-4 breach. ☒ N

Report delivery method: ☐ copy left on site ☐ posted ☒ emailed ☐ faxed Date 27 March 2013

Comments:

Overall score 98% - Refer to accompanying OMA audit report.



Officer's Signature	Ian Oakes	Recipient's name or position within company	Keith Bakor
Continuation sheet used	No	No of Pages	2
CCS record number		N/A	

Notes to the recipient

This compliance report form may highlight non-compliance with your permit or directly applicable legislation as observed by the Environment Agency officer.

This does not relieve the site operator of their responsibility to ensure that they comply with the permit and to prevent pollution of the environment. You are also reminded that:

- you should comply with the conditions of the permit at all times
- compliance with the permit does not remove your obligation to comply with other legislative provisions which may apply.

Understanding the Compliance Assessment Summary

a) Permitted activities	1	Specified by permit
b) Infrastructure	1	Engineering for prevention and control of emissions
	2	Closure and decommissioning
	3	Site drainage engineering (clean and foul)
	4	Containment of stored materials
	5	Plant and equipment
c) General management	1	Staff competency/training
	2	Management system and operating procedures
	3	Materials acceptance
	4	Storage, handling, labelling and segregation
d) Incident management	1	Site security
	2	Accident, emergency and incident planning
e) Emissions	1	Air
	2	Land and groundwater
	3	Surface water
	4	Sewer
	5	Waste
f) Amenity	1	Odour
	2	Noise
	3	Dust/fibres/particulates and litter
	4	Pests, birds and scavengers
	5	Deposits on road
g) Monitoring and records, maintenance and reporting	1	Monitoring of emissions and environment
	2	Records of activity, site diary/journal/ events
	3	Maintenance records
	4	Reporting and notification to the Environment Agency
h) Resource efficiency	1	Efficient use of raw materials
	2	Energy efficiency

The term 'permit' for the purposes of this form includes: licences, authorisations and consents.

Understanding your non-compliance scores

Non-compliance findings are classified using our published Compliance Classification Scheme, (CCS).

This scheme categorises breaches of permit conditions based on their potential for environmental impact as shown below. If you wish to discuss further any comments made by the officer on this form, contact your local area office or for more details of the CCS scheme, see the Environment Agency's website or contact your local office.

CCS category	Description	Score
1	A non-compliance which has a potentially major environmental effect	60
2	A non-compliance which has a potentially significant environmental effect	31
3	A non-compliance which has a potentially minor environmental effect	4
4	A non-compliance which has no potential environmental effect	1

Corrective action

We have various options to ensure that you correct actual or potential non-compliance. We may

- advise on corrective actions, verbally or in writing and require you to take specific actions, by letter or by issuing a notice.
- require you to review your procedures or management systems
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit is an offence, and we may take legal action:

- We will normally provide advice/guidance to assist operators back into compliance. However, other than for a very minor offence this will normally be in conjunction with another enforcement response.
- Where we have issued a written warning this does not preclude us from taking additional enforcement action if further relevant information comes to light. Such action includes the issue of a formal caution, taking a prosecution and/or the service of a notice.

We have published our Enforcement and Prosecution Policy which seeks to achieve a consistent approach to enforcement across all our regulated activities.

Operational Risk Appraisal (Opra)

Compliance assessment findings may affect your Opra score. This score determines your charge and affects the allocation of our resources to check your compliance with the permit.

Data protection notice

The Environment Agency is responsible for regulating environmental protection, flood defence, water resources and fisheries. It has a duty to discharge its functions to protect and enhance the environment and to promote conservation and recreation. The information provided will be processed by the Environment Agency to fulfill its regulatory and monitoring functions, and to maintain the relevant public register(s). The Environment Agency 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, emergency services) 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 Environment Agency 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 Environment Agency 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 the assessment 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 the 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 manager, Area Environment Manager or Area Manager. If you wish to raise your dispute further, this can be done through our official Complaints and Commendations procedure phone our general enquiry number 08708 506506 (Mon to Fri 08.00–18.00) and ask for the Customer Contact team, alternatively you can send an email to enquiries@environment-agency.gov.uk. If, after following our Complaints and Commendations procedure, you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the Parliamentary Ombudsman phone their helpline on 0345 015 4033.

OMA Version 3 emissions to air and /or water EPR

Instructions for completion of OMA Reports

OMA section 1-4 reports

The four OMA sections have individual report sheets that should be completed during the OMA audit. The operator should be allowed to make a copy of the completed reports.

A score of 1 – 5 should be determined for each element with reference to V3 of the OMA guidance document. A pragmatic approach should be taken to decide on the most appropriate score. A not applicable score should be used as a last resort and will require a supporting comment to justify the decision.

If any of the three fundamental elements score less than three, comments must be included to detail the remedial actions intended.

The summary comment box is to record comments from the OMA auditor. This could include, for example, comments regarding individual elements in more detail.

OMA Summary sheet

The summary sheet can be completed during the OMA audit, but usually after the OMA auditor has left site. A copy does not have to be made available to the operator at the time of the audit.

The overall site assessment comment box is to record summary comments from the OMA auditor. These could include, for example planned actions, issues arising, concerns with scores. Also, if any action resulting from the OMA audit is required such as a letter/variation/enforcement, these details should be also be recorded on the overall site assessment section, for example relevant dates included as part of the overall site assessment comments.

The auditor/Regulatory Officer should also tick the relevant desktop audit by data verification (DV) / On Site Audit (OS Audit) / or Monitoring box depending upon what course of action is proposed if the site is selected for the National Site Identification process. See new Site Identification process. This data should be transferred to the OMA spreadsheet to assist with this process.

Data input

The four OMA section reports plus the OMA summary sheet should be forwarded through agreed channels for input into the OMA datasheet.

OPERATOR MONITORING ASSESSMENT

SUMMARY SHEET WATER

Authorisation/Permit Number: BW9999IG, as varied	Site Inspector/Officer: Ian Oakes	
Operator: Kronospan Limited	Auditor (if different):	
Emission Point: W1	Others Present: Harry Earl, James Henderson, Keith Baker	
OMA Sections		SCORE
OMA 1 - Management, training and competence of personnel		100%
OMA 2 - Fitness for purpose of monitoring methods		95%
OMA 3 - Maintenance and calibration of monitoring equipment		N/A
OMA 4 - Quality assurance of monitoring		100%
		OVERALL SCORE
		98%
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement
<p>Recommendation with respect to sampling the lagoons:</p> <p>Samples are taken from a purpose built access platform at the discharge end of the lagoons. The sample bucket is first washed out and a sample taken. It is then transferred to a clean 250 ml glass jar and transported to the laboratory by vehicle. Sample jars are reused after a thorough washing. It is planned to move to automatic sampling as part of the lagoon project, which would provide a more robust method. It is recommended to move to automatic sampling as soon as is practicable.</p>		
		Date of audit: 7 March 2013
		Signed: Ian Oakes

OMA SUMMARY SHEET

OMA REPORTS – discharges to Water – EPR

OMA REPORT

OMA 1: Management, training and competence of personnel

Authorisation/Permit Number: BW9999IG

Date: 7 March 2013

OMA ELEMENTS	SCORE	COMMENTS
A. Management structure	5	Demonstrated clear roles and responsibilities: Technician, Environmental Coordinator, Technical, SHE and Senior management.
B. Schedules	5	Schedules and procedures comprehensively covered in the electronic Integrated Management System. Procedures provided and discussed.
C. Use of results	5	Always discharge in consent. Real time response (aerators for ammonia spikes). Results trended and relayed to management. Viewed electronic trend for daily unionised ammonia 2012 .
D. Understanding of requirements.	5	Clear understanding of requirements. Planned move to continuous discharge from the lagoons in 2013 / 14.
E. Competence of personnel	5	Operators trained by line management with respect to permit requirements and procedures with joint sign off. Training records provided.
OMA 1 – SCORE	25/25	

SUMMARY COMMENTS FOR OMA 1

An organogram was provided and roles and responsibilities were discussed.

The procedures within the IMS adequately cover the monitoring requirements of the permit. A copy of the Surface Water Procedure Review 2013 was provided.

Discharge to water procedure WI/5006 ensures that the 'batch' discharge from the two lagoons into the Afon Bradley meets the permitted emission limits. The ESMIL plant technician is responsible for sampling and monitoring lagoon levels with telemetry provided by Nortech and high level alarms set at 60%. In practise the lagoons are operated between 10 and 30% to provide space for run off during wet weather conditions. The two lagoons are operated with one filling and one empty and rotated accordingly. The filling lagoon is isolated and the flow diverted. The lagoons are only discharged when in consent.

The lagoon project will move to continuous discharge through an effluent treatment plant and reed bed over the period 2013 / 14. The move will significantly improve the 'health' of the Afon Bradley by reducing scouring and helping to maintain flow and quality.

Training records were provided and discussed. A copy of ESMIL Technician Training 2013 was provided.

OMA REPORTS – discharges to Water – EPR

OMA 2: Fitness for purpose of monitoring methods		
Authorisation/Permit Number: BW9999IG		Date: 7 March 2013
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling facilities Fundamental Element	5	Sample platform was inspected and found to provide safe access and a suitable monitoring point adjacent to the discharge.
B. Measurement techniques Fundamental Element	4	Sample taken and transferred to a glass jar and transported by vehicle to the on site laboratory. To move to automatic sampling.
C. Use of relevant methods	5	Methods as specified in permit.
D. Certification of equipment	N/A	No continuous emissions monitoring.
E. Performance characteristics of the method	5	Standard methods as agreed.
OMA 2 – SCORE	19/20	
SUMMARY COMMENTS FOR OMA 2		
<p>Samples are taken from a purpose built access platform at the discharge end of the lagoons. The sample bucket is first washed out and a sample taken. It is then transferred to a clean 250 ml glass jar and transported to the laboratory by vehicle. Sample jars are reused after a thorough washing. It is planned to move to automatic sampling as part of the lagoon project, which would provide a more robust method. It is recommended to move to automatic sampling as soon as is practicable. A copy of the Lagoon Operation Risk Assessment / Method Statement was provided.</p> <p>The monitoring is considered to be specific to the determinands with no significant interference from other species. Copies of the Surface Water Testing Methods and W1 Testing 'Daily' Sheet from February 2013 were provided.</p> <p>The Environment Agency Wales samples the discharge once per month.</p>		
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OMA REPORTS – discharges to Water – EPR

OMA REPORT

OMA 3: Maintenance and calibration of monitoring equipment

Authorisation/Permit Number: BW9999IG

Date: 7 March 2013

OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of maintenance and calibration procedures	N/A	No continuous emissions monitoring.
B. Frequency of maintenance and calibration		
C. Equipment reliability		
D. Breakdown response		
E. Traceability.		
F. Acceptability of calibration methods Fundamental Element		
OMA 3 – SCORE		

SUMMARY COMMENTS FOR OMA 3

OMA REPORTS – discharges to Water – EPR

OMA REPORT

OMA 4: Quality assurance of monitoring		
Authorisation/Permit Number: BW9999IG		Date: 7 March 2013
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of monitoring procedures	5	All documented within electronic integrated management system with access as required.
B. Quality control schemes	5	ISO9001/14001 & OHSAS18001
C. Auditing of monitoring	5	Comprehensive internal and external auditing. ISO audits take two weeks per year.
D. Audit compliance	5	High audit compliance.
E. Reporting	5	Full data capture with detail to management and Board as required (full annual report).
OMA 4 – SCORE	25/25	
SUMMARY COMMENTS FOR OMA 4		