

Compliance Assessment Report CAR_NRW0044551

Permit being assessed: BJ9681IX.

For: Oakenholt Mill EPR/BJ9681IX, **held by:** SCA Hygiene Products UK Limited

At: OAKENHOLT PAPER MILL CHESTER ROAD , FLINT, FLINT, CLWYD, CH6 5PU.

Type of assessment: Audit,

Reason: Routine.

On: 12/06/2024 between 09:30 and 14:15.

Parts of permit assessed: See report.

NRW Lead Officer: Kathryn Bradshaw, accompanied by Victoria Griffin.

Report sent to: Quality & Environment Manager, Quality & Environment Manager, on 01/07/2024.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR3A - Installations - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR4A - Installations - Information - Records	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
IR3D	Please update NRW with the further actions to be taken once completed: Vent control valve setting to be reviewed and adjusted Maintenance plans to be set up for pressure transmitter, check valve, vent control valve - including calibration Installation of an automatic shutdown programme	31/10/2024

Compliance criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This was a pre-arranged inspection to complete an Operator Monitoring Assessment (OMA) for Water and Air.

The Quality and Environment Manager was the host for the site visit accompanied by the SQE Engineer.

OMA Audit Water

The sites management system of water emissions monitoring is of a high standard. A UKAS accredited laboratory is used for the analysis of water samples and the daily analysis conducted at the on- site laboratory is of a good standard. The site achieved an overall score of 100% which is excellent.

OMA Audit Air

All air emissions monitoring is carried out by suitably qualified MCERTS accredited external contractor. The sites management system of air emissions monitoring is of a high standard. The site achieved an overall score of 97% for the OMA audit for air. The main recommendation for improvement is to consider a permanent access platform for the emission point A1 which the site has already started to review.

Please refer to the full OMA audit reports for more details.

During the site visit the annual phosphate breach for 2023 was discussed and the site is planning to conduct further investigations into the root cause of this issue on the Effluent Treatment Plant (ETP) and to prevent re-occurrence.

The site also provided an update regarding the PM1 line and building which may require a permit variation. The site was advised that as soon as any plans are confirmed they need to start the permit variation process.

Schedule 5 Notification (WIRS 2408656)

On 2nd June 2024 NRW received a Part A Schedule 5 notification for a release of steam from a safety release valve causing a noise issue for approximately an hour at 03:20 hrs on 2nd June. A detailed investigation has been undertaken and the root cause identified:

The shut down sequence for the Yankee reduced the steam pressure from 8 to 0 bar in one step, which increased the steam pressure in the condensate steam system. The pressure inside this system increased to above the reseal but slightly lower than the safety valve lift settings. Safety valve operated correctly. Fluctuations in the steam pressure then caused the valve to open / close. The control valve should have operated before the safety valve, which would have vented steam pressure through the control valve silencer.

Actions that have been completed since the incident:

- Control valve checked – no obvious signs of damage
- Check valve replaced as a precaution.

Further actions to be taken:

- Vent control valve value setting to be reviewed and adjusted.
- Maintenance plans to be set up for pressure transmitter, check valve, vent control valve – including calibration.
- Automatic programme to be installed for shutdown.

Please update NRW once these actions have been completed.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.