

Compliance Assessment Report CAR_NRW0046210

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: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: Q4 monitoring & annual report.

NRW Lead Officer: Kathryn Bradshaw.

Report sent to: Quality & Environment Manager, Quality & Environment Manager, on 11/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2 Schedule 3(b) Table S3.2.
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2. Schedule 3(b) table S3.3.
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
2	8

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
IR3A(1)	Provide timescales of when the new dosing pumps are to be	28/02/2025

Criteria	Action needed	Complete by
	installed.	
IR3A(1)	Provide a definitive root cause for this issue and advise NRW what methods will be implemented to reduce the phosphorus limits.	27/06/2025

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 Compliance Assessment Report (CAR) has been raised in relation to the Q4 2024 monitoring returns and annual report.

Q4 Monitoring Returns

The Q4 monitoring returns were received on 15th January 2025 for discharges from W1 and W2 emission points in compliance with permit condition 4.2.3. Schedule 5 notifications were received for breaches of the total suspended solids limit for the following dates;

25/11/24 – 26/11/24 = 72.9mg/l

02/12/24 – 03/12/24 = 196 mg/l

The permitted limit for total suspended solids is 50 mg/l.

Score:

IR3A Emissions to water, air or land. Permit Condition 3.1.2 Schedule 3(b) Table S3.2. C3

Internal investigations determined there was a technical issue with the chemical dosing pumps. New dosing pumps are to be installed. No timescales have been provided for this.

Action

Provide timescales of when the new dosing pumps are to be installed.

All other reported parameters were in compliance with the ELV's applied by Permit

Condition 3.3.1, Schedule 3(b), Table S3.2.

Annual Returns

Annual monitoring for emissions to air for emission point A1 was reported as required by Permit Condition 3.3.1, Schedule 3(b), Table S3.1. The reported parameter was in compliance with the ELV.

Annual monitoring for emissions to water was reported as required by Permit Condition 4.2.3. The limits are listed in Schedule 4(b) Table S4.1. The result for phosphorus was 0.020 Kg/tonne which is in breach of the annual limit and an increase on the previous year.

Score:

IR3A Emissions to water, air or land. Permit Condition 3.1.2. Schedule 3(b) table S3.3. C3

A Schedule 5 Part A and B was received for this breach on 15th January 2025. The breach was identified when calculating the phosphorus concentration for the annual returns. This limit was also breached in 2023. A definitive root cause for the high phosphorus levels has not yet been identified. Investigations are continuing into this issue. Methods of removal of phosphorus are now being investigated, however the impact of these on other permit parameters needs to be considered.

Action

Provide a definitive root cause for this issue and advise NRW what methods will be implemented to reduce the phosphorus limits.

An annual performance report has been submitted as required by Permit Condition 4.2.2. including the parameters detailed in Schedule 4(b) Table S4.2.

Water usage and air emissions have all reduced mainly due to the closure of PM1 which ceased production in January 2024. The site now only has one paper machine in production. This appears to have impacted on the treatment of effluent resulting in some breaches of suspended solids and total phosphorus. The site is continuing to investigate and work on these issues to ensure compliance in the future.

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.