

Compliance Assessment Report CAR_NRW0048070

Permit being assessed: BJ9703IM.

For: Flint Paper Mill EPR/BJ9703IM, **held by:** Kimberly-Clark Limited

At: Flint Paper Mill Aber Road , Flint, Flintshire, CH6 5EX.

Type of assessment: Site Inspection,

Reason: Routine.

On: 09/04/2025 between 10:05 and 12:56.

Parts of permit assessed: See Report.

NRW Lead Officer: Kathryn Bradshaw, accompanied by Jamie Blythin.

Report sent to: Flint Site Environmental & Energy Leader, Flint Site Environmental & Energy Leader, on 25/04/2025.

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)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR2A - Installations - Operations - Permitted activities	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
1	4

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)	Production has ceased and the effluent plant has been cleaned and emptied	30/04/2025

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 following a pre-arranged site inspection following the shut down and decommissioning of Coleshill Mill and Effluent Treatment Plant (ETP).

The site provided an update on the closure and decommissioning process at Coleshill Mill and ETP. They explained that once the Mill stopped production all areas were emptied and cleaned down. Waste water was initially treated in the ETP and once the levels had reduced, waste water and sludge were tankered off site for disposal. All the drainage systems in the permitted area were emptied and jetted out.

We inspected the permitted area of the site. We viewed the ETP and all of the empty tanks which had been cleaned. Temporary submersible pumps were located in the tanks to periodically empty out any rain water that may accumulate. The crumb store has been emptied and cleaned as well as the Nutromex storage tanks and bund.

Empty Aeration Tank



Empty Clarifier



Crumb Store



No further water emissions will be generated from emission point W2 now all of the tanks have been emptied and no further water emissions will be discharged through the permitted pipeline into the River Dee. Any rainwater generated from the ETP area has now been diverted into the site surface water drainage system.

Empty final effluent tank



All surface water discharges from the ETP and Coleshill Mill areas enter the on site lagoon which is regularly tested to ensure no pollutants are discharged off site.

The mains gas to the boiler for Coleshill Mill has been isolated and therefore no air emissions will be generated from emission point A6, boiler flue. The emission points A7 to A18, which are associated with production, will no longer be used as the tissue mill stopped running in December 2024. The machine is still in situ which we were able to see whilst on site and all areas have been drained down and washed out.

All chemicals that were used in the mill and ETP process have either been sent back to suppliers or removed as waste. Hydraulic equipment used in the ETP process have all been drained down and isolated.

We viewed the incoming waste area which had all been cleared except for some excess product that was being stored in the building. No further wastes will be accepted and the site is awaiting a decision on the removal of the excess product.

Waste reception area



Records, data, photos and videos have all been taken and retained of the decommissioning process.

The site has engaged with a consultant to undertake groundwater and soil sampling of the site, but no decisions have been made as yet to apply for a permit surrender.

Coleshill Mill has shut down permanently from 31/01/25.

Q1 Monitoring and Waste Returns

The Q1 2025 monitoring returns were submitted on 16th April 2025 in compliance with permit condition 4.2.3. Monitoring was undertaken in compliance with permit condition 3.3.

Schedule 5 notifications were received on 09/01/25 and 20/01/25 for a breach of the ammonia limit on emission point W2. The ammonia limit stipulated in the permit is 4 mg/l. The result from 09/01/25 was 10.7 mg/l and 10.736 mg/l on 20/01/25.

The site implemented the following corrective actions:

Addition of de-nitrifying bacteria

Activation of splash aerators

However the cold weather meant that the de-nitrifying bacteria were not as effective and

did not reduce the ammonia level. Only 7 discharges were made during December 2024 to January 2025 versus the usual 14 discharges per week during normal production.

As the site has now ceased production and the ETP is empty no further actions are required.

A C3 score has been applied for breach of permit condition 3.1.2, Schedule 3 (b), Table S3.2.

All other reported parameters were in compliance with the emission limit values (ELV's) in Schedule 3 (b), Table S3.2.

Waste Returns

Q1 2025 waste returns were submitted on 16th April 2025 in compliance with permit condition 4.2.5.

No wastes were accepted during Q1 2025 due to production ceasing in December 2024. Various paper wastes were removed in Q1 2025 to clear the crumb storage and waste reception buildings.

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.