

Compliance Assessment Report CAR_NRW0048503

Permit being assessed: BT4885IT.

For: Shotton Paper Mill EPR/BT4885IT, **held by:** Shotton Mill Limited

At: WEIGHBRIDGE ROAD SHOTTON , DEESIDE, DEESIDE, CLWYD, CH5 2LL.

Type of assessment: Site Inspection,

Reason: Routine.

On: 12/05/2025 between 10:00 and 16:00.

Parts of permit assessed: Various.

NRW Lead Officer: Stuart Ross.

Report sent to: Technical Manager, Technical Manager, on 12/06/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR1A - Installations - Management - General Management	C3 Minor	1.1
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	

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
IR2C	Action 1 – Review Boiler 7 start up and shutdown definitions against the requirements of Environment Agency Guidance	31/07/2025

Criteria	Action needed	Complete by
	and submit proposed definitions to NRW for agreement.	
IR1A	Action 2 –Shotton Mill Ltd shall review procedure reference RCID 31405 to ensure it achieves the requirements of permit condition 2.3.4 and resubmit to NRW.	31/07/2025
IR3E	Action 3 - As agreed, Shotton Mill Ltd to provide NRW with a timescale/plan for the implementation of MCERTs certified Data Handling and Acquisition Software to Boiler 7.	31/07/2025
IR3B	Action 4 - Provide NRW with a copy of your current Dust Management Plan / Emissions Management Plan	31/07/2025

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 has been raised following a routine site inspection and meeting with the operator, Shotton Mill Ltd.

1. Permit Variation Application - Update

The operator reports that the substantial permit variation application to authorise the future operation of the new container board mill, tissue mill, combined heat and power plant, anaerobic digestion plant and other changes continues to be prepared by the operator's consultant - SLR.

The operator anticipates that the application will be submitted to NRW within 2 to 3 weeks of the inspection date.

NRW continues to stress the importance of submitting the application at the earliest opportunity given NRW's 8 – 12 month permitting work queue and the operator's expectations to commence operation of new activities in 2025/2026.

2. Boiler 7 Start Up and Shut Down Definitions

Further to Compliance Assessment Report CAR_NRW0044196, the operator has produced a 'Waste Incinerator Management Plan – OTNOC Management Plan' dated July 2024 that

included proposed start up and shut down definitions.

During the inspection the start up and definitions were discussed and NRW provided verbal feedback that requires the proposals to be amended and resubmitted.

Please note that we cannot provide comment on 'Other than Normal Operating Conditions' (OTNOC) at this stage given OTNOC does not currently apply. An OTNOC Management Plan will be required following Waste Incineration BAT Conclusions review which will be triggered by the substantial permit variation described in the section above.

The operator acknowledged the feedback and agreed to review the start up and shut down definitions against the Environment Agency Guidance Note as previously supplied.

Action 1 – Review Boiler 7 start up and shutdown definitions against the requirements of Environment Agency Guidance and submit proposed definitions to NRW for agreement by 31/07/25.

3. Boiler 7 – Abnormal Operation

Further to an action in CAR_NRW0044196 the operator supplied a copy of procedure reference 'RCID 31405' titled '*NRW Air and Water Discharge Consent Limits and Notification Requirements (EWI 0374)*, Rev 9'

On page 4 and within the 'Abnormal Operating Conditions' section of the procedure it states that;

If CO or Particulate Matter from CEMS is lost, the following must be adhered to;

“During any period of abnormal operation a consistent steam flow should be maintained with the following parameters being monitored at all times:

- *At least two 2 of the three (3) Combustion control oxygen meters*
 - *42QIZ-0180*
 - *42QIZ-0181*
 - *42QIZ-2380*
- *Total High Pressure Steam Outlet Flow*
 - *42FI-0901*
- *Prestack Carbon Monoxide Meter*
 - *42QI-0205*
- *Prestack Dust Monitor*
 - *42QI-0952*

In the event of any of the above parameters becoming unavailable then waste shall not be charged or cease to be charged with immediate effect regardless of the period of running hours within the abnormal period. Waste is described as solid fuel consisting of sludge or recycled wood. This means gas firing only”.

Permit condition 2.3.4 states that;

Waste shall not be charged, or shall cease to be charged, if:

- (a) the combustion chamber temperature is below, or falls below, 850 C; or
- (b) any continuous emission limit value in schedule 3 table S3.1(c) is exceeded; or
- (c) any continuous emission limit value in schedule 3 table S3.1(b) is exceeded, other than under “abnormal operating conditions”; or
- (d) monitoring results required to demonstrate compliance with any continuous emission limit value in schedule 3 table S3.1(b) are unavailable other than under “abnormal operating conditions”**

Table S3.1(b) requires that you must be able to monitor and demonstrate compliance with ELVs for CO, particulate matter and TOC.

Therefore, if CO, PM or TOC CEMS are lost then waste shall not be charged or cease to be charged.

Boiler 7 cannot enter a 4 hour period of abnormal operation if any one of these measurements are unavailable – the incinerator must begin the shutdown process and only recommence the charging of waste once the CEMS issue has been resolved.

It is not acceptable to rely on process monitoring surrogates and continue to burn waste if any of these CEMS are not operational.

NRW considers that the procedure does not ensure compliance with permit condition 2.3.4 and is therefore in breach of permit condition 1.1 attracting a non-compliance score of C3.

Action 2 –Shotton Mill Ltd shall review procedure reference RCID 31405 to ensure it achieves the requirements of permit condition 2.3.4 and resubmit to NRW by 31/07/25.

Boiler 7 CEMS Data Handling and Reporting

The operator has committed to upgrade the existing CEMS Data Handling and Acquisition Software to MCERTs certified software that will improve the integrity of data handling, reporting and provide improved functionality.

This will ensure compliance with permit condition 3.3.3

'Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.3.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by Natural Resources Wales....'

Action 3 - As agreed, Shotton Mill Ltd to provide NRW with a timescale/plan for the implementation of MCERTs certified Data Handling and Acquisition Software to Boiler 7 by 31/07/25.

OMA Audit

Further to the 2024 audit of the operator's emissions monitoring arrangements for

discharges to sewer and surface water, Shotton Mill Ltd have revised procedures for the sampling and monitoring of these discharges. The procedures will be audited at the next OMA.

Site Inspection

A walk of the site was completed but due to ongoing construction activities it was restricted to the pedestrian walkways around these areas.

Construction of the new container board mill, tissue mill, combined heat and power plant, anaerobic digestion plant and effluent treatment plant continues at pace.

Emission points E1 and W1 were visited, the refrigeration unit serving the MCERTs autosampler at E1 was operating and samples were cold to the touch evidencing that the unit has been repaired since the OMA.

A significant quantity of wood dust was being generated by vehicle movements on the wood yard and from a distance it appeared that the wood yard surface had not been wetted. Some dust suppression was operational where wood was transferred from the stockpile to the processing plant.

The inspection follows a long spell of warm and dry weather and it is important that Shotton Mill Ltd responds accordingly to ensure dust emissions are minimised during such conditions.

Due to the site location dust emissions are unlikely to affect any residential receptors but could potentially affect adjacent businesses and cause deposits to the environment outside the site boundary. During this inspection no offsite deposits were substantiated.

The operator agreed to increase the frequency of wood yard wetting to reduce dust emissions. NRW also advised that housekeeping is improved to reduce the quantity of wood dust / debris present on the open yard areas.

Action 4 - Provide NRW with a copy of your current Dust Management Plan / Emissions Management Plan by 31/07/25.

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.