

Compliance Assessment Report

Report ID:
CAR_NRW0032033

This form will report compliance with your permit as determined by an NRW officer

Site	Oakenholt Mill EPR/BJ9681IX	Permit Ref	BJ9681IX		
Operator/Permit holder	SCA Hygiene Products UK Limited				
Regime	Installations				
Date of assessment	24/07/2017	Time in	13:30	Out	15:50
Assessment type	Site Inspection				
Parts of the permit assessed	All Below				
Lead officer's name	Ellis, Rhys				
Accompanied by	McGregor-Andrew, Sian,Barrett, Philip				
Recipient's name/position	Mike King/ Safety Specialist & Environment Leader	Date issued	21/08/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Specified by permit	O	2.4.1
KEY: See Section 5 for breach categories, suspended scores will be indicated as such. A = Assessed or assessed in part (no evidence of non-compliance), X = Action only, O = Ongoing non-compliance, not scored.		

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

The main purpose of today's visit was to discuss the proposed improvement on the Effluent Treatment Plant (ETP). We also discussed the outstanding improvement conditions highlighted in your permit.

Present in the Meeting was Rob Greaves (Project Engineer SCA), John Williams Poole Project, Nick Arundell (SCA Safety and environment) and Mike King (SCA - Safety specialist and Environment Leader) and Rhys Ellis, Sian McGregor-Andrew and Phil Barrett from Natural Resources Wales.

Effluent Treatment Plant

A summary of the updated plan was provided by SCA and Poole Project Limited. It became apparent that there are significant differences in the design compared to what was originally submitted by site to NRW a couple of months ago. (for example- the inclusion of an extra DAF unit on the upgraded plant).

It was also explained that PM1 will have a new DAF unit whilst the old one will be utilised by the ETP system.

Action 1

We appreciate that at this moment in time your plans/drawings may be subject to change, but please could you forward Natural Resources Wales the following when you are in a position to do so.

- Revised site layout plan once you have finalised the plan and once the civils work have been completed.
- ETP Process flow diagram
- Updated time plan.

Action 2

During the meeting the following was discussed and agreed

- Site to confirm what flocculants and coagulants are currently used on PM1, PM2 and current ETP
- Site to confirm what flocculants and coagulants will be used in the upgraded ETP

It was also discussed that because the effluent treatment plant is being upgraded and PM1 Krofta replaced, operating techniques will need to be updated, as a result of this the permit will require a variation.

It was discussed that the following considerations (but not limited to) need to be noted when applying for and deciding the type of permit variation required

- Does the new proposal affect the quality of the discharge i.e are any additional chemicals used (flocculants and coagulants) which as a result could be present in the final discharge
- Environmental Risk Assessment should be reviewed and updated if required.

Please refer to the 'Risk assessments for your environmental permit' page of the gov.uk website, in particular the guidance on completing risk assessments given under the heading 'Risks from your site' on this page. Depending on any possible changes to the nature of the discharge from site you might need to use the Environment Agency's risk assessment tool (also known as the H1 assessment tool) to complete an environmental assessment of the risks from emissions from the upgraded Effluent Treatment Plant.

- Review of the operators OPRA profile (If applicable)
- Consideration to schedule 1 (Table S1.1 activities, A2 S5.4 a1 (a) (i). Due to the introduction of the DAF it is likely that you will need to include (ii) physio-chemical treatment as an addition under Table S1.1 A2 activities

The type of variation you apply for depends on the technical input required by us and depends on factors such as if the proposal changes the nature of the discharge or if re modelling is required. It would be up to you to demonstrate (considering the above) the level of variation you deem most appropriate to apply for.

The 2 types of variation that you are likely need to consider is a Minor or Normal.

Minor would involve some technical input by us but considerably less than for a normal variation and would attract a fee of £1280

A normal variation is a variation that is not an administrative only change, a minor technical change or a substantial variation. This type of variation would attract a fee of £2109 based on your current OPRA score from the weighting table multiplied by relevant charge multiplier, which for normal variations is 57.

Please see our charging scheme for more information, which is available on the 'our charges' page of our website.

There are statutory timeframes for NRW to determine permit variation applications, therefore it would be advisable for you to allow sufficient time for this and incorporate it into your project timeline.

For a normal variation the typical timescales is 3 months determination time once the application is duly made. However please note our permitting department are experiencing high level of applications, therefore determination might take longer than the statutory timescales.

For further advice on how you can vary a permit please see application forms and guidance notes available from the link below. All applicants (except those applying for an administrative change only) must fill in part A and F, and complete the appropriate part C sections.

It was also discussed that whilst varying this permit to include the upgraded plant it would be prudent to change the errors currently noted in the permit.

Review of Environment Management System

It was also discussed that your Environmental Management system and any associated operating procedures will need to be updated to reflect the Effluent treatment plant upgrade.

Improvement programme requirements.

Improvement condition 6.

The site has submitted a report on environmental noise monitoring undertaken at SCA Hygiene products UK Ltd, Oakenholt Paper Mill dated 30th January 2017. The survey compares the results with the measurements taken in 2015 before the new fan was installed. Subsequently, further information has been provided by SCA by way of clarification.

Having viewed the report and additional information, we can confirm that the noise levels measured in 2017 appear to be broadly comparable with measurements taken in 2015. Having checked our records no noise complaints were received for the latter period of 2015. However, it is important that the performance of the new fan does not deteriorate particularly at night. This will require ongoing noise and vibration monitoring of all relevant equipment on site. Natural Resource Wales view this condition as discharged though noise and vibration performance will be the subject of future audits.

Improvement condition 7. Priority Substances

You have previously advised that you are having difficulty analysing some of the determinants due to issues associated with limit of detection of the accredited laboratories. You have subsequently been in contact with alternative laboratories to see if they can achieve a lower of detection limit. (6 in total)

It was discussed that for those determinants that you have been unsuccessful in finding alternative laboratories and have failed the screen as a result, a list of those determinants will be forwarded to NRW in the final report. For each of these determinants you provide a case of whether or not you believe those substances are present or not in the discharge or if there is a potential for those to be released in any of the raw materials used in to the process etc.

The operator must provide Natural Resources Wales with a report detailing results of the emission monitoring, the results from the screening tests and the results from any phase 2 modelling. Please include your H1 Assessment screening & sample analysis results and confirmation of the outcome your investigations into availability of suitable analysis at lower limits of detection at alternative MCERTS labs.

Please can you submit this report no later than 2nd October 2017. You should inform NRW in advance if there are any issues in you meeting this deadline.

Improvement condition 8 - Submitting the written protocol

The operator is overdue in achieving this improvement condition. The operator has outsourced the work to a contractor to help with this work and have now confirmed it is a company called RSK who have been appointed.

Please note that the deadline for the improvement condition stipulated in the permit is 30th September 2016 (Should be 31st March 2017). This has now lapsed. It is important that the site now start this work in order to meet the other improvement conditions within the permit i.e improvement condition 9.

Please can the site confirm no later than 4th September 2017 when this report will be submitted to Natural Resources Wales.

Improvement condition 9- Report on baseline conditions of soil and groundwater.

As above the appointed consultant will now be supporting SCA with this work.

Please can the site confirm no later than 4th September 2017 when this improvement condition will be completed?

Change in name

The operator must make reference to condition 4.3.4 of the permit in regards to any change in the operators trading name, registered name or registered office address

EPR Compliance Assessment Report

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Operator/Permit holder	SCA Hygiene Products UK Limited	Date	24/07/2017

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
A1	O	Respond to actions highlighted in CAR from and comply with improvement conditions.	02/10/2017

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW 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 (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW 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 NRW 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 fifteen working days of receipt of this 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 this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.