

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	13/04/2018	Time in	09:30	Out	11:30
Assessment type	Site Inspection				
Parts of the permit assessed	all below				
Lead officer's name	Ellis, Rhys				
Accompanied by	McGregor-Andrew, Sian				
Recipient's name/position	Mike King/ Safety Specialist	Date issued	25/06/2018		

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	X	
B1 - Infrastructure - Engineering for prevention and control of emissions	X	
B5 - Infrastructure - Plant and equipment	X	

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

There has been a delay in this CAR form being issued as NRW requested additional information following this site meeting.

The main purpose of today's visit was to discuss the new effluent treatment plan and to discuss Essity's request for an extension period for the proposed upgrade.

Present in this meeting was Rhys Ellis and Sian McGregor Andrew (Regulatory officers) and Rob Greaves and Mike King (Essity) and Phil Hartwell of Poole project.

(A1) Specified by permit

(B1) Engineering for prevention and control of emissions

(B5) Plant and equipment

It was explained that the reason why the site requires an extension is due to Essity having to re-plan and relocate part of the new plant, due to the original location within a building being declared an unsafe area. It was also explained that they have encountered problems with the new sludge tanks, due to a pressure build up within the tank causing damage. This tank is no longer serviceable and is scheduled to be replaced (See photograph 1 below).

The following actions were agreed

- Essity to provide a formal request for an extension to the September 2018 deadline. The response should include reasons for this (which you explained verbally today) and current update of where you are with the ETP and what needs to be done. It would be useful for you to provide a PDF copy of revised timeline to be included with response. **UPDATE** : NRW have now received a PDF timeline and the formal request for extension.
- Essity to provide a site plan of the whole ETP setup fully labelled. **UPDATE**: This has now been received.
- Essity to refer and respond to CAR form issued following a visit on the 27th July 2017 (NRW 0032033) There are a few missing pieces of information that we requested for. These included details of what flocculants and coagulants are currently used on PM1, PM2 and current ETP, and site to confirm what flocculants and coagulants will be used in the upgraded ETP. (As discussed this might have implications on Permit variation). The operator should also consider the other points raised in the CAR form reference 0032033 and during today's discussion regarding consideration for a need to vary the permit.. NRW have yet to receive this information. **ACTION 1**: Please could you respond no later than 18th July 2018.
- Essity advised that they have queries in regards to the sites abstraction consent. Essity are currently gathering information from the production teams with regard to this, and will contact NRW once all the information has been collated.

Site also replied to the following actions, however we do have some further actions/recommendation

- Essity to provide a process flow diagram of the final ETP setup. With areas due to be installed highlighted. This has now been forwarded to NRW.

ACTION 2: Please could you update this to include dosing points, location of flow metering, continuous monitoring and process control points and submit a revised no later than 18th July 2018.

- Essity to forward a commissioning plan to NRW as soon as this is complete. This has now been received.

ACTION 3:

Please can Essity

- Inform NRW when Secondary DAF is up and running and send results of the 2 weekly results before final change over.
- Please confirm that there will be no change over until the site have reached compliance
- Please inform NRW of results of the new plants performance before decommissioning the old plant.
- If at any stage you need to re commission the old plant or there is a significant deterioration in effluent quality during change over inform NRW immediately.
- Please provide dates for the decommissioning of the old biological system and its conversion into the new effluent plant buffer tank (when known).

Other matters

Reg 60 Notice spreadsheet.

Attached with this CAR form is the Reg 60 notice spreadsheet officers were referring to during the visit. This was submitted as part of reference 10 of Table S1.3 of the permit. **UPDATE** : This has now been received and NRW will respond accordingly if required.

Improvement conditions.

In regard to Improvement condition 8 which was in relation to submitting the written protocol and improvement condition 9 which was a report on baseline conditions of soil and groundwater, you have advised that 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.

In an email response dated 1st September 2017 you have advised that you envisage this work taking place in Q1 (January – March 2018) as these costs do not form part of the sites current budget.

ACTION 4 : Please could you provide an update in relation to these two improvement conditions. It is imperative that these now are completed to avoid any further breaches of permit conditions. Please respond by 18th July 2018.

Please note that the deadline for Improvement condition 8 was 30th September 2016 and 31st March 2017 for improvement condition 9.

Please could you respond no later than 18th July 2018 in regards to these matters.



Photograph 1

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033521**

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Operator/Permit holder	SCA Hygiene Products UK Limited	Date	13/04/2018

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.

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			
B1	X	See Actions in CAR fom	18/07/2018
B5	X	See actions in CAR form	18/07/2018
A1	X	Please refer to CAR Form	18/07/2018

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.