

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

Site	Gelling Fibre Plant EPR/NP3433BC				Permit Ref	NP3433BC		
Operator/ Permit holder	Convatec Ltd							
Date	14/01/2016				Time in	09:30	Out	11:30
What parts of the permit were assessed	Routine Site Inspection - Odour Management							
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge		
Recipient's name/position	Mr Kevin Richards - HSE Manager							
Officer's name	David Griffiths				Date issued	25/01/2016		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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

Condition(s) breached

a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	NA	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	A	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded

0

Total compliance score
(see section 5 for scoring scheme)

0

If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Routine Site Meeting focusing on Odour Management with Kevin Richards (HSE Manager).

NRW agreed that routine site odour surveys will be undertaken twice a day as per current procedure. If your staff detect an odour then this information is to be also logged onto a spreadsheet detailing investigations and actions. Additionally, all survey sheets must be filed and available for inspection. Therefore, only the survey where odours are detected must be duplicated onto the spreadsheet.

NRW will then review this data on a quarterly basis, where you will summarise this data on the spreadsheet and submit a Schedule 1 Notification. Please note you may be issued a Permit Non-compliance once this information has been reviewed.

However, if a complaint is received then an investigation must be undertaken immediately and if the odour is confirmed by your staff then a schedule 1 must be completed and NRW informed immediately as per current procedure.

Discussed upgrade on site and the commissioning of a Thermal Oxidizer – NRW to provide information on potential emission limits for this process. Please note that the BAT AEL's below are what limits would be set if you applied for a Permit variation at this present time.

I have been looking into this, and benchmark ELV's (daily concentrations) from a thermal oxidiser (based on BAT) in the chemical sector would be typically:

- Total particulate matter – 10 mg/m³
- Total VOC's – 20 mg/m³
- SO₂ – 50 mg/m³
- CO – 50-100 mg/m³
- NO_x as NO₂ – between 50-200 mg/m³

These cover all the main pollutants that could potentially be monitored as part of the permit from this sort of site/process, although more determinants may need to be monitored for.

Please ensure that you have characterised the waste gas to ensure that the parameters above (from Sector Guidance Notes (SGN)) cover the type of emissions expected. In terms of all the possible organic compounds that could be emitted. (E.g. formaldehyde, butadiene, aromatics etc.)

As the SGN gives two limits for VOCs (or which these substances would be) based on whether Class A or B and their rate of release. There is more guidance on this in SGN (HMIP Guidance on Categorisation of VOCs 1996 (see M16 to get a copy).

In terms where we are now with BAT AELs and ELVs. If the site were being permitted now or permit varied now, we would consult the indicative ELVs in the current SGNs (as per limits

above). However, European Commission is preparing a separate BRef on Common Waste Gas Treatment in the Chemical Industry – the exact content is yet to be decided, with the anticipated information exchange in EU kick off meeting is not until later this year, with publication a year or two beyond that – 2017?

Not knowing the content, it is difficult for you as an operator or us as a regulator to pre-empt likely BAT Conclusions and Associated Emission Levels. Convatec should seek updates from their Trade Association (e.g. Chemical Industry Association) and the European BAT Reference Documents web site.

*****end of report*****



EPR Compliance Assessment Report

Report ID: NP3433BC/0256202

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Site	Gelling Fibre Plant EPR/NP3433BC	Permit	NP3433BC
Operator/ Permit	Convatec Ltd	Date	14/01/2016

Section 3- Enforcement Response

Only one of the boxes below should be ticked

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.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.

