

## **Environment Agency**

### **Review of an Environmental Permit for an Installation subject to Chapter II of the Industrial Emissions Directive under the Environmental Permitting (England & Wales) Regulations 2010 (as amended)**

#### **Decision document recording our decision-making process following review of a permit**

The Permit number is: EPR/BJ7603IP  
The Operator is: Billerudkorsnas Beetham Ltd  
The Installation is: Beetham Paper Mill  
This Variation Notice number is: EPR/BJ7603IP/V008

#### **What this document is about**

Article 21(3) of the Industrial Emissions Directive (IED) requires the Environment Agency to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication by the European Commission of updated decisions on BAT conclusions.

We have reviewed the permit for this installation against the revised BAT Conclusions for the production of pulp, paper and board industry sector published on 30 September 2014 in the Official Journal of the European Union. Where appropriate, we also considered other relevant BAT Conclusions published prior to this date but not previously included in a permit review for the Installation. In this decision document, we set out the reasoning for the consolidated variation notice that we have issued.

It explains how we have reviewed and considered the techniques used by the Operator in the operation and control of the plant and activities of the installation. This review has been undertaken with reference to the decision made by the European Commission establishing best available techniques (BAT) conclusions (BATc) for production of pulp, paper and board as detailed in document reference EU Official Journal (L 284) of Commission implementing decision 2014/687/EU of 26 September 2014. It is our record of our decision-making process and shows how we have taken into account all relevant factors in reaching our position. It also provides a justification for the inclusion of any specific conditions in the permit that are in addition to those included in our generic permit template.

As well as considering the review of the operating techniques used by the Operator for the operation of the plant and activities of the installation, the consolidated variation notice takes into account and brings together in a single document all previous variations that relate to the original permit issue. Where this has not already been done, it also modernises the entire permit to reflect the conditions contained in our current generic permit template.

The introduction of new template conditions makes the Permit consistent with our current general approach and philosophy and with other permits issued to installations in this sector. Although the wording of some conditions has changed, while others have been deleted because of the new regulatory approach, it does not reduce the level of environmental protection achieved by the Permit in any way. In this document we therefore address only our determination of substantive issues relating to the new BAT Conclusions and any changes to the operation of the installation.

## **How this document is structured**

1. Our decision
2. How we reached our decision
3. The legal framework
4. Annex 1– Review of operating techniques within the Installation against BAT Conclusions.
5. Annex 2a – Review and assessment of derogation request(s) made by the operator in relation to BAT Conclusions which include an Associated Emission Level (AEL) value.
6. Annex 2b - Consultation responses
7. Annex 3 – Improvement Conditions
8. Annex 4– Review and assessment of changes that are not part of the BAT Conclusions derived permit review.
9. Annex 5 - Priority Compliance Issues

# 1 Our decision

We have decided to issue the Variation Notice to the Operator. This will allow it to continue to operate the Installation, subject to the conditions in the Consolidated Variation Notice that updates the whole permit.

We consider that, in reaching that decision, we have taken into account all relevant considerations and legal requirements and that the varied permit will ensure that a high level of protection is provided for the environment and human health.

The Consolidated Variation Notice contains many conditions taken from our standard Environmental Permit template including the relevant annexes. We developed these conditions in consultation with industry, having regard to the legal requirements of the Environmental Permitting Regulations and other relevant legislation. This document does not therefore include an explanation for these standard conditions. Where they are included in the Notice, we have considered the techniques identified by the operator for the operation of their installation, and have accepted that the details are sufficient and satisfactory to make those standard conditions appropriate. This document does, however, provide an explanation of our use of “tailor-made” or installation-specific conditions, or where our Permit template provides two or more options.

## 2 How we reached our decision

### 2.1 Requesting information to demonstrate compliance with BAT Conclusion techniques

We issued a Notice under Regulation 60(1) of the Environmental Permitting (England and Wales) Regulations 2010 (a Regulation 60 Notice) on 21 November 2014 requiring the Operator to provide information to demonstrate where the operation of their installation currently meets, or how it will subsequently meet, the revised standards described in the relevant BAT Conclusions document.

The Notice required that where the revised standards are not currently met, the operator should provide information that

- Describes the techniques that will be implemented before 30 September 2018, which will then ensure that operations meet the revised standard, or
- justifies why standards will not be met by 30 September 2018, and confirmation of the date when the operation of those processes will cease within the installation or an explanation of why the revised BAT standard is not applicable to those processes, or
- justifies why an alternative technique will achieve the same level of environmental protection equivalent to the revised standard described in the BAT Conclusions.

Where the Operator proposed that they were not intending to meet a BAT standard that also included a BAT Associated Emission Level (BAT AEL) described in the BAT Conclusions Document, the Regulation 60 Notice required that the Operator make a formal request for derogation from compliance with that AEL (as provisioned by Article 15(4) of IED). In this circumstance, the Notice identified that any such request for derogation must be supported and justified by sufficient technical and commercial information that would enable us to determine acceptability of the derogation request.

The Regulation 60 Notice response from the Operator was received on 30 March 2015.

We considered that the response did not contain sufficient information for us to commence determination of the permit review. We therefore issued a further information request to the Operator. Suitable further information was provided by the Operator on 29 September 2015.

We considered it was in the correct form and contained sufficient information for us to begin our determination of the permit review.

The Operator made no claim for commercial confidentiality. We have not received any information in relation to the Regulation 60 Notice response that appears to be confidential in relation to any party.

## 2.2 Review of our own information in respect to the capability of the installation to meet revised standards included in the BAT Conclusions document

Based on our records and previous experience in the regulation of the installation we consider that the operator will be able to comply with the techniques and standards described in the BAT Conclusions other than for those techniques and requirements described in BAT Conclusion 1, 6, 16 and 53. In relation to these BAT Conclusions, we have accepted the operators proposed improvements should achieve compliance.

We have therefore included Improvement Conditions in the Consolidated Variation Notice to ensure that the requirements of the BAT Conclusion are delivered before 30 September 2018. See Annexs 1 and 5 for details.

### 2.3a Water Framework Directive (WFD)

Water Framework Directive (WFD)/Dangerous Substance Screen has been reviewed and amended to include priority pollutants under the WFD Hazardous pollutants regime. We have required all Operators to monitor both their discharge to water and the incoming water twice annually for these substances to help better assess the issue and potential sources of any elevated results.

A report has been produced detailing a monitoring programme conducted to assess the chemicals present in waste water and waste paper sludge from permitted paper mill sites to gather further information for WFD purposes and

to assess compliance with restrictions. This report along with a review of historically monitored parameters has been used to rationalise the requirement for inclusion of these substances in this standard suite within the permit:

**Table 1. Review of historic monitoring within paper & pulp sector**

<b>Substance</b>	<b>Action (remove, retain or add)</b>	<b>Justification</b>
Aldrin	Remove	Limited usage in wood treatment, banned since 1980's across UK & EU. No recent detects
Atrazine	Remove	Agricultural herbicide with little relevance to the sector other than in background water quality. Banned in 2004 across EU. No recent detects.
Azinphos-methyl	Remove	Agricultural insecticide with little relevance to the sector other than in background water quality. Banned in 2006 across EU. No recent detects.
Chlorpyrifos	Retain	OP insecticide with various approvals in UK, some usage in forestry and a recent detect in sludge samples.
Cypermethrin	Retain	SP insecticide still approved for use in forestry applications in UK. PHS/ PS under WFD across EU. Recent detects in effluent samples
Dichlorvos	Remove	OP insecticide removed from market gradually from 2002 in UK and 2012 in EU. Limited direct relevance to the sector and no recent detects.
Dieldrin	Remove	OP insecticide with historic usage for wood treatment. Restrictions and bans since 1970's. Very limited recent detects and no direct relevance to sector.
Endosulphan (Alpha & Beta)	Retain	Organochlorine pesticide whilst recently banned in EU, still in use in many other non-EU countries. Recent detects.
Endrin	Remove	Organochlorine insecticide. Numerous restrictions in place since 1970's. No recent detects.
Fenitrothion	Remove	OP mainly used as an insecticide. EU wide authorisations withdrawn from 2007 and of limited relevance to the sector. No recent detects.
Hexachlorobenzene	Remove	Previous approvals as a fungicide, banned in UK from 1975 and EU since 1998. No recent detects.
Nonylphenols (and NPE's)	Add	Whilst severely restricted across EU for many years. NPE's were detected in 70% of samples in recent study. NP was detected at 6/9 sites. Potential sources unknown.
PCP	Retain	No current approval in UK/EU, but still in use elsewhere as a wood preservative. Several recent detects.
Simazine	Remove	Herbicide no longer authorised across EU and of little relevance to sector. No recent detects.
TBT	Retain	Range of historic uses including wood preservative and is still likely to be in use in a wide range of applications across the world including as is wood preservative. Several recent detects.
Trifluralin	Remove	Main use as agricultural herbicide, no longer approved for use in UK /EU. No recent detects.

## Metals

Various metals are required to be monitored within the Pulp & Paper BREF.

The BREF states “relevant metals” and provides the following as examples: Zinc (Zn), Copper (Cu), Cadmium (Cd), lead (Pb), Nickel (Ni).

Our Data would indicate adding mercury (Hg) is warranted due to its widespread presence in the environment and some effluents. We have therefore included a twice annual screen for the following metals: Zn, Cu, Cd, Pb, Ni & Hg.

### 2.3b Assessment of substances liable to pollute

The WFD requires Member States to prior regulate, all substances in a discharge which are “liable to cause pollution”. Previously discharges from the Paper and Pulp Industry were controlled on a “liable to contain” approach set by the Dangerous Substances Directive through either numeric limits, or descriptive conditions. Under the “liable to cause pollution” approach numeric emission limits are only applied to those pollutants calculated to have the potential to cause pollution.

We have used this permit review to regulate discharges to surface waters from this installation using the “liable to cause pollution” approach, details of which is set out in our Horizontal Guidance Note H1 Annexe D1.

The H1 methodology uses a number of sequential steps to determine if a substance warrants detailed modelling and hence any emission limits being required, namely

- Screen out insignificant emissions that do not warrant further investigation;
- Determine if significant load test is failed;
- Decide if detailed water modelling is needed;
- Assess emissions against relevant standards and set limits where required.

Monitoring data has been subjected to checks and review prior to running through the screening process. Here we deal with such issues as results that are consistently at or below the limit of detection (LOD), waters abstracted and returned to the same environment and applying standard percentages of Environmental Quality Standard (EQS) if no upstream/ background water quality data is available. See H1 Annex D1 for the detailed procedures.

A summary of the assessment for liable to pollute for substances regulated at this installation is provided in Table 2 below. Assessments are based on the last three years of data submitted under the existing Environmental Permit.

**Table 2. Outcome of hazardous substances review process**

Substance	Control of Substance under Previous Regime	Data Review	Screening Stage  Screening for Insignificance / Significant Load	Setting Emission Limit	Control under (WFD)
No individual substances were prescribed in the permit					

### **3 The legal framework**

The Consolidated Variation Notice will be issued, under Regulations 18 and 20 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the IED;
- subject to aspects of other relevant legislation which also have to be addressed.

We consider that, in issuing the Consolidated Variation Notice, it will ensure that the operation of the Installation complies with all relevant legal requirements and that a high level of protection will be delivered for the environment and human health.

We explain how we have addressed specific statutory requirements more fully in the rest of this document.



## **Annex 1: decision checklist regarding relevant BAT Conclusions**

BAT Conclusions for the production of pulp, paper and board, were published by the European Commission on 30 September 2014. There are 53 BAT Conclusions. This annex provides a record of decisions made in relation to each relevant BAT Conclusion applicable to the installation. This annex should be read in conjunction with the Consolidated Variation Notice.

The overall status of compliance with the BAT conclusion is indicated in the table as:

NA	Not Applicable
CC	Currently Compliant
FC	Compliant in the future (within 4 years of publication of BAT conclusions)
NC	Not Compliant

Table 3. Decision checklist for relevant BAT Conclusions			
	Summary of BAT Conclusion requirement for production of pulp, paper and board	Status NA/CC/ FC/NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	BAT Conclusions that are not applicable to this installation	<b>NA</b>	Pulp & Paper Production BAT Conclusions; BAT conclusions for Kraft Pulping 19 - 32 inclusive; BAT conclusions for Sulphite Pulping 33 -39 inclusive; BAT conclusions for Mechanical / Chemical Pulping 40 and 41; BAT conclusions for Processing Paper for Recycling 42 - 46; BAT Conclusions 3, 4, 9, 11,
	BAT Conclusions where we accept the operator's Reg 60 notice response that they are currently compliant and no further explanation is required.	<b>CC</b>	Pulp & Paper Production BAT Conclusions: General BAT Conclusions for the Pulp and Paper Industry 2, 5, 7, 8, 10, 12, 13, 14, 15, 17, 18, BAT Conclusions for Papermaking and Related Processes 47, 48, 49, 50, 51, 52
	BAT Conclusions where improvements will be undertaken on site within the 4 year period in order to achieve compliance with the narrative and/or BATAEL prior to the 4 year deadline	<b>FC</b>	Pulp & Paper Production BAT Conclusions;  1, 6, 16, 53
	BAT Conclusions where the Operator has responded that they are not compliant and have not submitted any plans to become compliant	<b>NC</b>	Pulp & Paper Production BAT Conclusions; None

## **Key Issues**

BATC 50 and table 21 (waste water loads from non-integrated speciality mills) applies and therefore we have set the BAT AEL's as annual emission limits within table S3.3.

In this case we have accepted that the current annual emissions are well within the applicable range

BAT 50 Table 21

<b>Substance</b>	<b>BAT AEL's for Installation (kg/t)</b>	<b>BREF Source</b>	<b>Performance at time of Permit Review (kg/t)</b>	<b>Based on data from:</b>
Chemical Oxygen Demand	0.3 - 5	BAT 50 table 21	1.1 – 1.9	Range of 3 years data supplied in Regulation 60 response
Total Suspended Solids	0.10 - 1		0.19 – 0.35	
Total Nitrogen	0.015 – 0.4		0.028 -0.031	
Total Phosphorus	0.002 – 0.04		0.003 - 0.004	
AOX	0.05		0.001 – 0.003	
Biochemical Oxygen Demand	-		<10 mg/l	

BATC 5 also sets what is termed a BAT AEPL (BAT Associated Environmental Performance Level) for the amount of waste water the site should generate per tonne of paper produced.

Waterhouse Mill is classified as a Speciality Mill and as such BAT AEPL's do not apply.

Where relevant and appropriate, we have incorporated the techniques described by the Operator in their Regulation 60 Notice response as specific operating techniques required by the permit, through their inclusion in Table S1.2 of the Consolidated Variation Notice.

**Annex 2a: Assessment, determination and decision where an application(s) for Derogation from BAT Conclusions with associated emission levels (AEL) has been requested.**

The IED enables a competent authority to allow derogations from BAT AEL's stated in BAT Conclusions under specific circumstances as detailed under Article 15(4):

'By way of derogation from paragraph 3, and without prejudice to Article 18, the competent authority may, in specific cases, set less strict emission limit values. Such a derogation may apply only where an assessment shows that the achievement of emission levels associated with the best available techniques as described in BAT conclusions would lead to disproportionately higher costs compared to the environmental benefits due to:

(a) the geographical location or the local environmental conditions of the installation concerned; or

(b) the technical characteristics of the installation concerned.

The competent authority shall document in an annex to the permit conditions the reasons for the application of the first subparagraph including the result of the assessment and the justification for the conditions imposed. '

The Operator did not request derogation from compliance with any AEL included within the BAT Conclusions as part of their Regulation 60 Notice response.

**Annex 2b: Advertising and Consultation on the draft decision**

This section is not applicable as no derogations from BAT AEL's have been considered.

### Annex 3: Improvement Conditions

Based on the information in the Operator's Regulation 60 Notice response and our own records of the capability and performance of the installation at this site, we consider that we need to set improvement conditions so that the outcome of the techniques detailed in the BAT Conclusions are achieved by the installation. These improvement conditions are set out below - justifications for them is provided at the relevant section of the decision document (Annexes 1 and 5).

We also consider that we need to set improvement conditions relating to changes in the permit not arising from the review of compliance with BAT conclusions. The justifications for these are provided in Annex 5 of this decision document.

If the consolidated permit contains existing improvement conditions that are not yet complete or the opportunity has been taken to delete completed improvement conditions then the numbering in the table below will not be consecutive as these are only the improvement conditions arising from this permit variation.

**Table 3. Record of improvement conditions set**

Reference	Improvement Condition	Completion date
IC1	The operator shall submit, for approval by Environment Agency, a report identifying where techniques BATc 6 (e), (g), (h), (i) are implemented across the installation for each paper machine; and identifying any potential for further insulation of pipework under technique BATc 6 (f).	01/01/17
IC2	<p>The operator shall submit, for approval by Environment Agency, a report setting out progress to achieving the 'Narrative' BAT where BAT is currently not achieved, but will be achieved before 30 September 2018. The report shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"><li>1) Methodology for achieving BAT.</li><li>2) Associated targets / timelines for reaching compliance by 30 September 2018</li></ul> <p>Any alterations to the initial plan.</p> <p>The report shall address the following BATc:</p> <p>6, 53</p>	<p>Initial Report 01/09/16</p> <p>Progress reports by 01/03/17 01/09/17 01/03/18 01/09/18</p>

	<p>The report shall incorporate any agreed improvements from IC1</p> <p>The operator shall submit reports on progress with the approved compliance plan on a six monthly frequency specified by this condition</p>	
IC3	<p>The Operator shall undertake a review of the operation of the effluent treatment plant to verify that BATc 16 techniques (a), is implemented for (a) the current production regime at the Installation, and (b) to help facilitate the removal of emission point W4.</p> <p>The assessment of compliance with BATc 16 shall be undertaken by persons or organisations with suitable experience in the techniques detailed in BATc 16. Details of the assessors qualification shall be agreed with the Environment Agency in advance of the assessment being undertaken.</p> <p>The operator shall submit a report on the findings of the review and timescales to implement any remedial actions to achieve compliance with BATc 16.</p>	01/08/17
IC4	<p>The operator shall review the discharge of cooling water from emission points W1 and W2. The review shall consider;</p> <ul style="list-style-type: none"> <li>- whether there are opportunities to reuse cooling water elsewhere in the installation</li> <li>- whether there are opportunities to recover latent energy from the temperature of the discharge</li> <li>- techniques available for reducing the temperature of the discharge from the permitted Emission Limit Values.</li> </ul> <p>A report on the scope and findings of the review shall be submitted to the Environment Agency for approval.</p>	01/08/17

IC5	The operator shall submit a report providing evidence that emission point W4 has been decommissioned and the outfall pipe removed	01/12/18
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## **Annex 4: Review and assessment of changes that are not part of the BAT Conclusions derived permit review.**

### **Review of Site Report**

We have reviewed the Operators response to the Reg 60 Notice regarding the adequacy of their existing site report in fulfilling the requirements of a Site Condition Report for the purposes of IED. We have concluded that the existing report has been created and maintained by the Operator to a satisfactory standard and providing the Operator complies with the additional requirement for periodic monitoring, as contained within condition 3.1.4 it will comply with the revised requirements under IED

### **Waste Acceptance**

The operator has confirmed they no longer accept waste paper for reprocessing.  
We have removed conditions associated with the ability to accept recycled fibre (waste).

### **Air Emissions**

We have removed Emission Limit Values and monitoring requirements for emissions from the boiler plant as the requirement is disproportionate to the size of plant (MWth input).

### **Cooling Water Discharges**

We have set IC4 to review the continued suitability of discharging cooling water and whether there are technical means now available to recover this water as a source of process water and/or reduce energy loss through latent heat in the temperature of the water.



## Annex 5: Priority Compliance Issues & Detailed assessment of Reg 60 responses where future action likely

<b>Compliance Issue</b>  Priority BAT indicated in <b>Bold Text</b>	<b>Relevant Permit Condition</b>	<b>Compliance stated by Operator</b>  <b>CC/FC/NC/NA</b>	<b>Compliance assessment conclusion</b>  <b>CC/FC/NC/NA</b>	<b>Summary of Permitting Officer Assessment against BATc techniques</b>	<b>Compliance Action to Implement BAT Conclusions</b>
<b>Environment Management System: BAT 1</b>	<b>1.1.1</b>	<b>FC</b>	<b>FC</b>	<p>Operator maintains externally certified EMS to ISO14001. Further information submitted with the RFI identifies techniques (vii) and (ix) are not currently embedded in the EMS. Reference to EMS documentation provided in RFI Response.</p> <p>Surveillance Audit identified issues indicating EMS may not be as effective as response illustrates (e.g. condition of bunds)</p>	<p><b>Validate compliance by Inspection</b></p> <p>The operator has identified their EMS is predominantly compliant with exception of two techniques.</p> <p>EMS Audit recommended to track compliance with techniques</p>
<b>Raw materials: BAT 2</b>	<b>1.3.1</b>	<b>CC</b>	<b>CC</b>	<b>Response to Regulation 60 and particularly RFI demonstrate robust chemical selection</b>	<b>Validate compliance by Inspection</b>

<b>Compliance Issue</b>  Priority BAT indicated in <b>Bold Text</b>	<b>Relevant Permit Condition</b>	<b>Compliance stated by Operator</b>  <b>CC/FC/NC/NA</b>	<b>Compliance assessment conclusion</b>  <b>CC/FC/NC/NA</b>	<b>Summary of Permitting Officer Assessment against BATc techniques</b>	<b>Compliance Action to Implement BAT Conclusions</b>
				and acceptance process, spill management and housekeeping controls. Techniques used are referenced in the RFI response.	
Raw materials: BAT 3	1.3.1	NA	NA	Regulation 60 response confirmed Hydrogen Peroxide is not used but some chelating agents contain EDTA/DTPA	None
Raw materials handling: BAT 4	1.1.1	NA	NA	Regulation 60 response confirmed no wood pulping occurs	None

<b>Water usage: BAT 5</b>	<b>1.3.1</b>	<b>CC</b>	<b>CC</b>	<p><b>Regulation 60 Response and particularly the RFI response detail techniques used for water flows. Evidence of active (2015) water reduction programme reviewing spay nozzle aperture and water sources, improvements to re-use an clarification techniques.</b></p> <p><b>As the installation is a speciality mill BAT AEPL`s do not apply. Responses suggest products (food packaging and hygiene markets) is likely to be a barrier to reduced freshwater use – although many food grade processes have high levels of water recovery.</b></p> <p><b>Overall sufficient evidence to accept operators submission they are compliant, but recommend pace</b></p>	<p><b>Validate compliance via inspection</b></p> <p><b>Recommend water audit undertaken to assess application of techniques and justification of barriers to reducing freshwater use.</b></p>
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<b>Compliance Issue</b>  Priority BAT indicated in <b>Bold Text</b>	<b>Relevant Permit Condition</b>	<b>Compliance stated by Operator</b>  <b>CC/FC/NC/NA</b>	<b>Compliance assessment conclusion</b>  <b>CC/FC/NC/NA</b>	<b>Summary of Permitting Officer Assessment against BATc techniques</b>	<b>Compliance Action to Implement BAT Conclusions</b>
				and attitude to water reduction could be challenged further	
<b>Energy consumption: BAT 6</b>	<b>1.2.1</b>	<b>FC</b>	<b>FC</b>	<p>Evidence provided of use of techniques including thermo-compressors, steam and condensate pipework insulation (&lt;80%), rolling programme of replacement motors. Further evidence provided in RFI response as to suitability of techniques (b) and (c).</p> <p>The response is not clear how techniques are applied across paper machines and indicates there is scope to ensure application of energy efficient technologies is implemented across both paper machines</p>	<p>We have set IC 1 to require a further review of how energy efficiency measures are used across the installation.</p> <p>We have set IC 2 to track implementation of BAT6 (a) within the management system and to review application of energy efficient techniques across the installation.</p>

Compliance Issue  Priority BAT indicated in <b>Bold Text</b>	Relevant Permit Condition	Compliance stated by Operator  <b>CC/FC/NC/NA</b>	Compliance assessment conclusion  <b>CC/FC/NC/NA</b>	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
				(e.g. use of thermo compressors on PM2).  <b>Energy Management currently only through ISO14001 which as identified in the RFI response does not cover all relevant techniques. The operator commits to improvements by 2018.</b>	
Odour control: BAT 7	3.3.1	CC	CC	The response to the Regulation 60 Notice indicated the application of techniques listed under the BATc. There is no indication that odour is a particular issue.	Validate compliance via inspection
Monitoring process: BAT 8	3.5.1	CC	CC	Evidence provided that relevant process monitoring is undertaken as specified in BATC 8	Validate compliance via inspection

<b>Compliance Issue</b>  Priority BAT indicated in <b>Bold Text</b>	<b>Relevant Permit Condition</b>	<b>Compliance stated by Operator</b>  <b>CC/FC/NC/NA</b>	<b>Compliance assessment conclusion</b>  <b>CC/FC/NC/NA</b>	<b>Summary of Permitting Officer Assessment against BATc techniques</b>	<b>Compliance Action to Implement BAT Conclusions</b>
Monitoring air: BAT 9	3.5.1	NA	NA	Regulation 60 response confirms no chemical pulping occurs	None
<b>Monitoring water: BAT 10</b>	<b>3.5.1</b>	<b>CC</b>	<b>CC</b>	<b>Evidence provided that relevant monitoring is undertaken as specified in BATC 10. except for AOX / EDTA. Have been added to Table S3.2</b>	<b>Validate Compliance via inspection</b>
Odour control: BAT 11	3.3.1	NA	NA	Regulation 60 response confirms no pulping occurs	None
<b>Waste management: BAT 12</b>	<b>1.4.1</b>	<b>CC</b>	<b>CC</b>	Evidence provided in the response to the RFI, that waste is segregated for application of Waste Hierarchy and that techniques to comply with BATc 12 are in place	Validate Compliance via inspection
Emissions to water: BAT 13	1.3.1	CC	CC	Regulation 60 response states high nutrient chemicals not used and dosing controlled.	Validate compliance via inspection

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				Current emissions compared to BAT EAL's support this	
<b>Emissions to water: BAT 14</b>	<b>1.3.1 &amp; 2.3.1</b>	<b>CC</b>	<b>CC</b>	<b>The Regulation 60 response confirms the installation operates Gravitational Settlement and Secondary Activated Sludge Treatment plants.</b>	<b>None</b>
Emissions to water: BAT 15	2.3.1	NA	NA	Concentrations of organic substances, Phosphorous and Nitrogen within BAT AEL's.  No local indicators further removal is needed.	None
Emissions to water: BAT 16	2.3.1	CC	FC	The response to the regulation 60 identifies how techniques (b) and (c) are complied with.	IC 3 for BATc 16(a)  IC 5 to confirm emission point W4 has been decommissioned
				The effluent plant has an emergency overflow	

Compliance Issue  Priority BAT indicated in <b>Bold Text</b>	Relevant Permit Condition	Compliance stated by Operator  <b>CC/FC/NC/NA</b>	Compliance assessment conclusion  <b>CC/FC/NC/NA</b>	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
				<p>for use during sludge bulking which is not consider to be meet the requirements of BATc 16 (a). In addition through our regulation of the site, we know production regime is substantially different to when the plant was originally designed and installed (1990`s) and there appears an issue with the current sizing of the ETP</p> <p>We have therefore set an IC to initiate a review of the design and operation of the effluent plant to confirm compliance with BATc 16 (a) as well as help llan for the removal of emission point W4</p>	



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<b>Noise control: BAT 17</b>	<b>3.4.1</b>	<b>CC</b>	<b>CC</b>	<b>The Regulation 60 response references techniques detailed in BATc 17 are implemented through the Noise Management Plan.</b>	<b>Validate compliance via inspection</b>  <b>Review application of techniques as necessary depending on noise complaints</b>
Decommissioning: BAT 18	3.1.4	CC	CC	The regulation 60 response confirms the Site Closure Plan is maintained	Validate Compliance via inspection
Recycled Fibre raw materials: BAT 42	1.3.1	NA	NA	The installation does not accept recycled fibre.	None
Recycled Fibre water emissions: BAT 43	1.3.1				
Recycled Fibre water management: BAT 44	1.3.1				
Recycled Fibre water AEL's:	1.3.1 & 3.5.1				

<b>Compliance Issue</b>  Priority BAT indicated in <b>Bold Text</b>	<b>Relevant Permit Condition</b>	<b>Compliance stated by Operator</b>  <b>CC/FC/NC/NA</b>	<b>Compliance assessment conclusion</b>  <b>CC/FC/NC/NA</b>	<b>Summary of Permitting Officer Assessment against BATc techniques</b>	<b>Compliance Action to Implement BAT Conclusions</b>
BAT 45					
Recycled Fibre energy: BAT 46	1.2.1				
<b>Paper making waste water: BAT 47</b>	<b>1.3.1</b>	<b>CC</b>	<b>CC</b>	<b>The Regulation 60 response details which techniques are applied and is very similar to BATc 5</b>	<b>Validate compliance via Inspection</b>  <b>Recommend review application of techniques as part of Water Audit</b>
<b>Paper making water usage: BAT 48</b>	<b>1.3.1</b>	<b>CC</b>	<b>CC</b>	<b>The regulation 60 response covers off how techniques for this BATc are applied to confirm compliance.</b>	<b>Validate compliance via Inspection</b>  <b>Recommend review application of techniques as part of Water Audit</b>
Paper making water management: BAT 49	1.3.1	CC	CC	The regulation 60 response argues technique (a) is not applicable due to small volumes and incompatibility of coating chemistry. Creping treatment plant provides pre-treatment before effluent treatment plant	Validate compliance via inspection

<b>Compliance Issue</b>  Priority BAT indicated in <b>Bold Text</b>	<b>Relevant Permit Condition</b>	<b>Compliance stated by Operator</b>  <b>CC/FC/NC/NA</b>	<b>Compliance assessment conclusion</b>  <b>CC/FC/NC/NA</b>	<b>Summary of Permitting Officer Assessment against BATc techniques</b>	<b>Compliance Action to Implement BAT Conclusions</b>
Paper making water emissions: BAT 50	1.3.1 & 3.5.1	CC	CC	The operator submitted data to indicate they are currently compliant with BAT AEL's by supplying 3 years of data 2012-2014. See Key Issues.	Validate compliance via Inspection
Paper making Volatile Organic Compounds: BAT 51	3.2.1	CC	CC	The operator coats a small proportion of papers (1% of production) on ancillary equipment with dyes containing acetic acid. Dyes are aqueous based where possible.	Validate compliance via inspection
<b>Paper making waste generation: BAT 52</b>	<b>1.4.1</b>	<b>CC</b>	<b>CC</b>	<b>Fibre filler and broke recovery in place. Regulation 60 response suggests primary fibre recovery not applicable due to cleanliness of product grades which could be challenged further.</b>	<b>Validate compliance via inspection.</b>  <b>Review justification for not applying technique BATc 52 (c)</b>
<b>Paper making energy consumption: BAT 53</b>	<b>1.2.1</b>	<b>FC</b>	<b>FC</b>	<b>The RFI response undertakes a commitment to review application of</b>	<b>IC 2 shall track progress with improvements to energy efficiency measures</b>

<b>Compliance Issue</b>  Priority BAT indicated in <b>Bold Text</b>	<b>Relevant Permit Condition</b>	<b>Compliance stated by Operator</b>  <b>CC/FC/NC/NA</b>	<b>Compliance assessment conclusion</b>  <b>CC/FC/NC/NA</b>	<b>Summary of Permitting Officer Assessment against BATc techniques</b>	<b>Compliance Action to Implement BAT Conclusions</b>
				<b>techniques associated with compliance.</b>  <b>We have set IC 2 to track implementation</b>	
Response to Question 4 of Reg 60: ability of site report to be considered as a site condition report under IED	3.1.4	CC	CC	Response indicated that current site report has been kept up to date and will be reviewed and amended in order to comply with IED	Validate compliance by Inspection to ensure Operator amends site report where necessary, including the requirement for periodic monitoring where justified.
Note permit condition 2.3.1 will require Operate to operate as per Regulation 60 response documents referenced in Table S1.2.					