

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/BJ8995ID](#)
The Operator is: Preston Board and Packaging Limited
The Installation is: Romiley Board Mill
This Variation Notice number is: [EPR/BJ8995ID/V005](#)

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 it was in the correct form and contained sufficient information for us to begin our determination of the permit review but not that it necessarily contained all the information we would need to complete that determination.

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 the written submissions provided in response to the Regulation 60 Notice and the request for further information 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 Conclusions 18 and 44.

In relation to BAT Conclusions 18 and 44, we have included an improvement condition in the Consolidated Variation Notice to ensure that the requirements of the BAT Conclusions are delivered before 30 September 2018. See Annexes 1 and 5 for details.

2.3 Requests for Further Information during determination

Although we were able to consider the Regulation 60 Notice response generally satisfactory at receipt, we did in fact need more information in order to complete our permit review assessment, and issued a further information request. We received a response on 5 August 2015. A copy of the further information response was placed on our public register.

2.4a 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		
Substance	Action (remove, retain or add)	Justification
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.

2.4b 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.

An assessment of emissions is not applicable as there are no direct discharges to surface waters.

For the discharge to sewer we have removed monitoring requirements for dangerous substances, other than those specified in the twice annual screen detailed in Section 2.4a. We have also included the metals detailed in section 2.4a.

We have also removed monitoring for the other parameters (biochemical oxygen demand, suspended solids, total nitrogen, total phosphate, cadmium and mercury) and removed the limit for PCP which is now included in the hazardous pollutants screen.

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 2. 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	NA	<p>Pulp & Paper Production BAT Conclusions:</p> <p>General BAT Conclusions for the Pulp and Paper Industry 3, 4, 8 to 11, 13 to 16;</p> <p>BAT conclusions for Kraft Pulping 19 - 32 inclusive;</p> <p>BAT conclusions for Sulphite Pulping 33 -39 inclusive;</p> <p>BAT conclusions for Mechanical / Chemical Pulping 40 and 41;</p> <p>BAT conclusions for Processing Paper for Recycling 45 and 46;</p> <p>BAT conclusions for Papermaking 48 to 51</p>
	BAT Conclusions where we accept the operator's Reg 60 notice response that they are currently compliant and no further explanation is required.	CC	<p>Pulp & Paper Production BAT Conclusions:</p> <p>General BAT Conclusions for the Pulp and Paper Industry 1, 2, 5, 6, 7, 12 and 17</p> <p>BAT Conclusions Processing Paper for Recycling 42 and 43</p> <p>BAT Conclusions for Papermaking and Related Processes 47, 52 and 53</p>

Table 2. 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 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	FC	Pulp & Paper Production BAT Conclusions; General BAT Conclusions for the Pulp and Paper Industry 18 and 44. Refer to Annex 5 below for the setting of an Improvement Condition (IC) for BAT 18 and BAT 44 to address deficiencies.
	BAT Conclusions where the Operator has responded that they are not compliant and have not submitted any plans to become compliant	NC	None

Key Issues

BAT Conclusion 5

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.

The BAT-associated waste water flow should fall within the range 1.5-10 m³/t (yearly average). The average yearly waste water flow is below the range, see below.

BAT Associated Waste Water Flow (m³/Adt)		Performance at time of Permit Review (m³/Adt)
RCF paper mill without deinking	1.5 – 10	0.87

At 0.87m³/t the mill is operating advanced water circuit closure as detailed within **BAT 44**. We have concluded, mainly due to a lack of automatic monitoring and dosing control for the control of biofilms and odour, that the mill is not currently operating to BAT and have set an improvement condition accordingly.

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).

Existing improvement condition 9.16 is complete (refer to our letter dated 31 October 2011) and the opportunity has been taken to delete it from the Permit. We have started renumbering improvement conditions arising from this permit variation from IC1.

Table 3. Record of improvement conditions set		
Reference	Improvement Condition	Completion date
IC1	<p>The operator shall submit, for approval by the 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"> • Methodology for achieving BAT. • Associated targets / timelines for reaching compliance by 30 September 2018 • Any alterations to the initial plan – for progress reports <p>The report shall address BATc 18 and 44</p> <p>The operator shall submit reports on progress with the approved compliance plan on a six monthly frequency specified by this condition.</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>

Annex 4: Review and assessment of changes that are not part of the BAT Conclusions derived permit review.

Fire Prevention

Having reviewed the Operators response to the Regulation 60 Notice it is clear that appreciable quantities of combustible waste materials are stored on site prior to re-pulping and therefore we have included the standard conditions contained in our current generic permit template, requiring the Operator to produce a Fire Prevention Plan on request.

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 3.1.3 it will comply with the revised requirements under IED.

Emissions to sewer

We have amended table S3.1 to remove monitoring for all parameters (biochemical oxygen demand, suspended solids, total nitrogen, total phosphate, cadmium and mercury) other than those in the hazardous pollutants screen. We also removed the limit for PCP which is now included in the hazardous pollutants screen.

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

Compliance Issue Priority BAT indicated in Bold Text	Relevant Permit Condition	Compliance stated by Operator CC/FC/NC/NA	Compliance assessment conclusion CC/FC/NC/NA	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
Environment Management System: BAT 1	1.1.1	CC	CC	ISO 14001 certified site, provided certificate dated 1 March 2015 and latest audit report dated 9 January 15. Further details on functionality of EMS provided in response to request for further information (RFI) which evidences each BAT technique sufficiently.	Validate compliance by Inspection
Raw materials: BAT 2	1.3.1	CC	CC	Reg 60 Response confirms chemical inventory held on site with all MSDS sheets, evidence of metering of chemicals and relevant spill management and housekeeping. RFI response informs that chemical replacement relies on REACH and appears to be supplier led.	Validate compliance by Inspection, specifically chemical replacement

Compliance Issue Priority BAT indicated in Bold Text	Relevant Permit Condition	Compliance stated by Operator CC/FC/NC/NA	Compliance assessment conclusion CC/FC/NC/NA	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
				<p>Sufficient to conclude compliant but may wish to raise contract issue with Area inspector.</p> <p>Spill management plan and training in place.</p>	
Raw materials: BAT 3	1.3.1	NA	NA	Hydrogen peroxide is not used.	None
Raw materials handling: BAT 4	1.1.1	NA	NA	No wood pulping occurs.	None

Compliance Issue Priority BAT indicated in Bold Text	Relevant Permit Condition	Compliance stated by Operator CC/FC/NC/NA	Compliance assessment conclusion CC/FC/NC/NA	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
Water usage: BAT 5	1.3.1	CC	CC	<p>The BAT-associated waste water flow should fall within the range 1.5-10 m³/t (yearly average). Last 3 years of data provided with Regulation 60 response shows the average yearly waste water flow is below the range at 0.87 m³/t.</p> <p>Details of application of techniques detailed in response to RFI.</p> <p>Very low water consumption makes BAT 44 applicable</p>	Validate ongoing compliance by Inspection
Energy consumption: BAT 6	1.2.1	CC	CC	<p>Evidence provided in the Regulation 60 response identifying application of a range of techniques associated with BATC 6.</p> <p>Evidence submitted of ongoing management</p>	Formal Energy Management System proposed. Suggest follow up to review how techniques are implemented across the installation

Compliance Issue Priority BAT indicated in Bold Text	Relevant Permit Condition	Compliance stated by Operator CC/FC/NC/NA	Compliance assessment conclusion CC/FC/NC/NA	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
				and reduction of energy use.	
Odour control: BAT 7	3.3.1	CC	CC	The Regulation 60 response did not identify why some of the techniques that are generally applicable are not used. RFI response contained detailed descriptions of the techniques to control odour. The site has ongoing odour issues requiring us to set an IC for BAT 44 but we have concluded compliance with BAT 7, based on the written submissions provided in response to the Regulation 60 Notice and the request for further information.	Review via ongoing compliance
Monitoring process: BAT 8	3.5.1	NA	NA	No process monitoring for air and water.	None
Monitoring air: BAT 9	3.5.1	NA	NA	No monitoring for air.	None

Compliance Issue Priority BAT indicated in Bold Text	Relevant Permit Condition	Compliance stated by Operator CC/FC/NC/NA	Compliance assessment conclusion CC/FC/NC/NA	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
Monitoring water: BAT 10	3.5.1	NA	NA	No monitoring for water.	None
Odour control: BAT 11	3.3.1	NA	NA	No pulping occurs.	None
Waste management: BAT 12	1.4.1	CC	CC	Reg 60 and RFI responses detail waste management practice, identifying techniques used and justifying those that are not.	Validate compliance by inspection Recommend compliance effort reviews the approach to manage process waste which is lacking in detail and encourage further recovery options for rejects.
Emissions to water: BAT 13	1.3.1	NA	NA	High nutrient chemicals not used.	None
Emissions to water: BAT 14	1.3.1 & 2.3.1	NA	NA	No direct discharge to water.	None
Emissions to water: BAT 15	2.3.1	NA	NA	No direct discharge to water.	None
Emissions to water: BAT 16	2.3.1	NA	NA	No direct discharge to water.	None

Compliance Issue Priority BAT indicated in Bold Text	Relevant Permit Condition	Compliance stated by Operator CC/FC/NC/NA	Compliance assessment conclusion CC/FC/NC/NA	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
Noise control: BAT 17	3.4.1	CC	CC	Reg 60 and RFI responses detail techniques used.	Validate compliance by inspection
Decommissioning: BAT 18	3.1.3	NA	FC	Limited response on decommissioning plan. Responses to RFI note that SCR would be used as the basis for any decommissioning plan.	IC set to require submission of decommissioning plan which is currently lacking.
Recycled Fibre raw materials: BAT 42	1.3.1	CC	CC	Evidence provided in the Regulation 60 response identifying application of a range of techniques associated with BATC 42. All baled RCF stored in building with hardstanding.	Validate compliance by Inspection
Recycled Fibre water emissions: BAT 43	1.3.1	CC	CC	Justification for current approach to fresh water use and waste water flow provided in response to the RFI.	
Recycled Fibre water	1.3.1	CC	FC	Evidence provided in the Regulation 60 response against techniques but	Set IC to require compliance by 2018 deadline, although ongoing

Compliance Issue	Relevant Permit Condition	Compliance stated by Operator	Compliance assessment conclusion	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
Priority BAT indicated in Bold Text		CC/FC/NC/NA	CC/FC/NC/NA		
management: BAT 44				continuous monitoring and control of dosing for biofilm/ odour control is lacking. Ongoing regulatory efforts on site have also focussed on lack of automatic dosing control and in line monitoring.	compliance work may require compliance sooner.
Recycled Fibre water AEL's: BAT 45	1.3.1 & 3.5.1	NA	NA	No direct discharge to water.	None
Recycled Fibre energy: BAT 46	1.2.1	NA	NA	New plant or rebuild so not technically applicable.	Validate compliance by Inspection
Paper making waste water: BAT 47	1.3.1	CC	CC	Evidence provided in the Regulation 60 response against each technique.	Validate compliance by Inspection
Paper making water usage: BAT 48	1.3.1	NA	NA	Applicable only to Speciality Mills.	None
Paper making water management: BAT 49	1.3.1	NA	NA	Applicable where coating colours and binders are used.	None
Paper making water emissions:	1.3.1 & 3.5.1	NA	NA	No direct discharge to water.	None

Compliance Issue Priority BAT indicated in Bold Text	Relevant Permit Condition	Compliance stated by Operator CC/FC/NC/NA	Compliance assessment conclusion CC/FC/NC/NA	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
BAT 50					
Paper making Volatile Organic Compounds: BAT 51	3.2.1	NA	NA	Regulation 60 response detailed no on-line coating.	None
Paper making waste generation: BAT 52	1.4.1	CC	CC	Evidence provided in the Regulation 60 response against each relevant technique.	None
Paper making energy consumption: BAT 53	1.2.1	CC	CC	Responses to Regulation 60 and RFI detail a combination of techniques that are used which demonstrate compliance.	Further work could review how wide technique (n) is across the installation and if replacement on failure is the appropriate approach rather than a rolling replacement programme.
Response to Question 4 of Reg 60: ability of site report to be considered as a site condition report under IED	3.1.3	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.					