

## **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/BK0205IE  
The Operator is: SCA Hygiene Products UK Limited  
The Installation is: Prudhoe Mill  
This Variation Notice number is: EPR/BK0205IE/V007

#### **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 10 April 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 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 8, 13, 17 and 18. In relation to these BAT Conclusions, we do not fully agree with the operator in respect to their current stated capability as recorded in their Regulation 60 Notice response. We have therefore included Improvement Condition IC1 in the Consolidated Variation Notice to ensure that the requirements of the BAT Conclusion are delivered before 30 September 2018. See Annex 1 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 on 22 September 2015. A copy of the further information request was placed on our public register together with the response received 28 October 2015.

#### 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**

<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.

### 2.4b 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.

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)
Mercury		All data below LOD	n/a	n/a	
Cadmium		All Data below LOD	n/a	n/a	
PCP	No ELV	Positive Detects mean is 0.01micrograms/l and max is 0.01micrograms/l	screen out at stage 1 (EQS is 0.4 AA & 1.0 MAC	n/a	

### 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

<b>Table 3. Decision checklist for relevant BAT Conclusions</b>			
	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; General BAT Conclusions for the Pulp and Paper Industry: 3, 4, 9, 11, 15, 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 Papermaking and Related Processes 48, 49, 51
	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 1, 2, 5, 6, 7, 10, 12, 14, 16, BAT Conclusions Processing Paper for Recycling 42, 43, 44, 45, 46.

<b>Table 3. Decision checklist for relevant BAT Conclusions</b>			
	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 for Papermaking and Related Processes 47, 50, 52, 53
	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; 8, 13, 17, 18
	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; -

## **Key Issues**

### BAT Conclusions for the production of Pulp and Paper

The operator has indicated that the following BAT conclusions are not currently complied with but will be by 01 October 2018: 8, 13, 17, 18. Improvement condition IC1 has been included in the permit to achieve compliance.

BATC 45 and table 19 (waste water loads from RCF mills with de-inking facilities) and BATC 50 and table 20 also applies and therefore we have set the BAT AEL's as annual emission limits within table S3.4.

The Mill has previously indicated that they are an integrated and multi product mill and we have therefore agreed a site specific ELV to impose these annual BAT AEL's via a mixing calculation in accordance with page 3 of the BATC chapter. This product mix has been stated as 33 % (Table 20) and 66% (Table 19) and we have agreed the figures involved with the Operator and included an additional permit condition as note 1 underneath table S3.4 requiring the Operator to inform us if the product mix changes in the future by more than 10% in any one direction. At that point the mixing calculation will need to be re-done.

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

### BAT 45 Weighted Apportionment

<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	0.65 – 3.168	Weighted apportionment of 33% RCF and 66% virgin fibre	0.955	Average 3 years data supplied in Regulation 60 response
Total Suspended Solids	0.013 – 0.383		0.145	
Total Nitrogen	0.01 – 0.15		0.024	
Total Phosphorus	0.0023 – 0.014		0.005	
AOX	0.05		0.00318	

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.

In this case although the current waste water flow is within the applicable range it is right at the very top of that range and so whilst we have accepted it as “compliant” we have highlighted the fact within the priority compliance issues table; Annex 5.

<b>BAT Associated Waste Water Flow (m3/Adt)</b>		<b>Performance at time of Permit Review (m3/Adt)</b>
RCF based tissue paper mill with deinking	7.83 - 23.33	22.39

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 (Annex 1 or Annex 2).

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 4. Record of improvement conditions set**

Reference	Improvement Condition	Completion date
IC1	<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 01 October 2018. The report shall include, but not be limited to, the following:</p> <ol style="list-style-type: none"> <li>1) Methodology for achieving BAT.</li> <li>2) Associated targets / timelines for reaching compliance by 01 October 2018</li> <li>3) Any alterations to the initial plan</li> </ol> <p>The report shall address the following BATc: 8, 13, 17, 18</p>	<p>Progress reports by</p> <p>31/12/16</p> <p>30/06/17</p> <p>31/12/17</p> <p>30/06/18</p>

IC2	The Operator shall submit for approval a site condition report (SCR) to meet the information requirements of Article 22(2) of the IED. The SCR shall include baseline conditions of soil and groundwater at the installation. This shall include the information necessary to determine the state of soil and groundwater contamination so as to make a quantified comparison with the state upon definitive cessation of activities provided for in Article 22(3) of the IED.	31/12/16
IC3	The Operator shall submit to the Environment Agency for approval, a report detailing the appropriate measures in place in relation to the control of particulate emissions from air emission points A3 – A9 listed in table S3.1 of this permit. The submission shall make reference to techniques used to manage the release of particulate matter including; the source of the particulate matter; available abatement, control measures, monitoring methods and inspection and monitoring frequencies.	31/12/16



## **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 and concluded that the existing report is not suitable under IED and have therefore added an improvement condition requiring the Operator to submit for approval a site condition report (SCR), including a baseline report compliant with Article 22 of the Industrial Emissions Directive (IED) where necessary.

### **Particulate emissions from Tissue mills**

Previously the Operator has been required to monitor and report (to MCerts standards) the emission of dust/ particulate matter from various emission points to air from the mill and not all emission points to air from the paper making activities have been accurately recorded and referenced by the Operator and hence the permit.

We have reviewed that monitoring data and concluded that the environmental risk posed is not sufficient to warrant it being maintained as a compliance monitoring requirement and we have removed that requirement from the permit and the data held on emission points to air from various dust extraction/emission points on site also appears to be inaccurate and not consistent with current operations on site.

We have therefore set an improvement condition requiring the Operator to submit for approval a report that details both the emission points and how the process monitoring as required by Table S3.5 will be conducted. The report will also detail monitoring/abatement technologies employed and inspection frequencies proposed.

<b>Annex 5: Priority Compliance Issues and detailed assessment of Reg 60 responses</b>					
<b>Compliance Issue</b>	<b>Relevant Permit Condition</b>	<b>Compliance stated by Operator</b>	<b>Compliance assessment conclusion</b>	<b>Summary of Permitting Officer Assessment against BATc techniques</b>	<b>Compliance Action to Implement BAT Conclusions</b>
Priority BAT indicated in <b>Bold Text</b>		<b>CC/FC/NC/NA</b>	<b>CC/FC/NC/NA</b>		
<b>Environment Management System: BAT 1</b>	<b>1.1.1</b>	<b>CC</b>	<b>CC</b>	<b>Evidence of application of relevant techniques provided in Regulation 60 response</b>	<b>Validate compliance by Inspection</b>
<b>Raw materials: BAT 2</b>	<b>1.3.1</b>	<b>CC</b>	<b>CC</b>	<b>Evidence of application of a range of techniques in Regulation 60 response including CUBE analysis, Chemical inventory, management and minimisation procedures</b>	
Raw materials: BAT 3	1.3.1	NA	NA	Regulation 60 response confirmed Hydrogen Peroxide is not used	
Raw materials handling: BAT 4	1.1.1	NA	NA	Regulation 60 response confirmed no wood pulping occurs	
<b>Water usage: BAT 5</b>	<b>1.3.1</b>	<b>CC</b>	<b>CC</b>	<b>No IC required but at upper end of the range (see key issues)</b>	<b>Current performance is in the upper part of the applicable BAT AEPL Range as detailed in Annex 1 Key Issues.</b>
<b>Energy</b>	<b>1.2.1</b>	<b>CC</b>	<b>CC</b>	<b>Evidence provided in</b>	<b>Operator not intending to attain</b>

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Priority BAT indicated in <b>Bold Text</b>		<b>CC/FC/NC/NA</b>	<b>CC/FC/NC/NA</b>		
<b>consumption: BAT 6</b>				<p>the Regulation 60 response identifying application of a range of techniques associated with BATC 6.</p> <p>Evidence submitted of ongoing management and reduction of energy use.</p>	an accredited energy management system.
Odour control: BAT 7	3.3.1	CC	CC	<b>Evidence submitted of ongoing odour management</b>	Ongoing evidence of odour reports
Monitoring process: BAT 8	3.5.1	FC	FC	Evidence provided that relevant process monitoring isn't undertaken as specified in BATC 8	Improvement condition IC1 to address monitoring requirements.
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</b>	On site KPI performance and ongoing monitoring.

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Priority BAT indicated in <b>Bold Text</b>		<b>CC/FC/NC/NA</b>	<b>CC/FC/NC/NA</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>	<b>Evidence provided that waste is segregated for application of Waste Hierarchy</b>	
Emissions to water: BAT 13	1.3.1	FC	FC	Regulation 60 response states the site is not compliant and has detailed a response in order to come into compliance	Site to undertake a study to assess the bio availability of N & P in reagent chemicals used and if a surplus nutrient balance is present in effluent. A reduction plan will be based on the findings
<b>Emissions to water: BAT 14</b>	<b>1.3.1 &amp; 2.3.1</b>	<b>CC</b>	<b>CC</b>	<b>Primary Settlement Tank, deep shaft and de gassing, Jet Aeration, activated sludge, final settlement</b>	<b>Audit of ETP procedures</b>
Emissions to water: BAT 15	2.3.1	NA	NA	Not applicable	
Emissions to water:	2.3.1	CC	CC	Concentrations of organic substances,	

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Priority BAT indicated in <b>Bold Text</b>		<b>CC/FC/NC/NA</b>	<b>CC/FC/NC/NA</b>		
BAT 16				Phosphorous and Nitrogen within BAT AEL`s. No local indicators that further removal is needed.	
<b>Noise control: BAT 17</b>	<b>3.4.1</b>	<b>FC</b>	<b>FC</b>	<b>Site has not identified all potential sources of noise and potential impact</b>	<b>Site to conduct noise surveys and implement an updated noise management plan in order to bring the site into compliance</b>
Decommissioning: BAT 18	3.1.6	FC	FC	No site closure plan is present and the site condition report has not been reviewed since permit application in 2001.	Improvement condition IC1 has been set to ensure the site complies with BAT 18: to create a site closure plan which incorporates all techniques described in BAT 18.
<b>Recycled Fibre raw materials: BAT 42</b>	<b>1.3.1</b>	<b>CC</b>	<b>CC</b>	<b>Evidence of application of relevant techniques provided in Regulation 60 response</b>	
<b>Recycled Fibre water emissions: BAT 43</b>	<b>1.3.1</b>	<b>CC</b>	<b>CC</b>	<b>Evidence of application of relevant techniques provided in Regulation 60 response</b>	
Recycled Fibre	1.3.1	CC	CC	<b>Evidence of</b>	

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Priority BAT indicated in <b>Bold Text</b>		<b>CC/FC/NC/NA</b>	<b>CC/FC/NC/NA</b>		
water management: BAT 44				<b>application of relevant techniques provided in Regulation 60 response</b>	
Recycled Fibre water AEL's: BAT 45	1.3.1 & 3.5.1	CC	CC	BATAELs are detailed in Annexe 1 Key Issues; Site subject to mixing calculation that combines BATAELs from table 19 & 20 at 2:1 ratio respectively; see key issues section	
Recycled Fibre energy: BAT 46	1.2.1	NA	CC	The officer does not agree with the operator stating that the site is NA. The BAT C is applicable to the site in the event of new plant of major refurbishment. The site is compliant.	
<b>Paper making waste water: BAT 47</b>	<b>1.3.1</b>	<b>NA</b>	<b>NA</b>	<b>Not applicable to this mill</b>	
<b>Paper making water usage: BAT 48</b>	<b>1.3.1</b>	<b>NA</b>	<b>NA</b>	<b>Applicable only to Speciality Mills</b>	<b>None</b>
Paper making water	1.3.1	NA	NA		

<b>Annex 5: Priority Compliance Issues and detailed assessment of Reg 60 responses</b>					
<b>Compliance Issue</b>	<b>Relevant Permit Condition</b>	<b>Compliance stated by Operator</b>	<b>Compliance assessment conclusion</b>	<b>Summary of Permitting Officer Assessment against BATc techniques</b>	<b>Compliance Action to Implement BAT Conclusions</b>
Priority BAT indicated in <b>Bold Text</b>		<b>CC/FC/NC/NA</b>	<b>CC/FC/NC/NA</b>		
management: BAT 49					
Paper making water emissions: BAT 50	1.3.1 & 3.5.1	NA	CC	BAT is applicable and site is compliant Bat 50 & 45 are linked in this case via the mixing calculation	
Paper making Volatile Organic Compounds: BAT 51	3.2.1	NA	NA	Regulation 60 response detailed no on-line coating	None
<b>Paper making waste generation: BAT 52</b>	<b>1.4.1</b>	<b>NA</b>	<b>CC</b>	<b>The BATc is applicable to the site as the site recirculates broke within the system</b>	
<b>Paper making energy consumption: BAT 53</b>	<b>1.2.1</b>	<b>CC</b>	<b>CC</b>	<b>We have accepted the Reg 60 response as being compliant although some BAT techniques are not currently installed.</b>	<b>Any future upgrades and improvements to the site infrastructure should look to address the descriptions in BAT 53</b>
Response to Question 4 of Reg 60: ability of site report to be considered	3.1.6	CC	CC	Response clarified that site report is inadequate for the purposes of an IED site condition report and hence IC 2 inserted	See IC 2 set to track progress towards a suitable SCR

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Priority BAT indicated in <b>Bold Text</b>		<b>CC/FC/NC/NA</b>	<b>CC/FC/NC/NA</b>		
as a site condition report under IED					
Note permit condition 2.3.1 will require Operate to operate as per Regulation 60 response documents referenced in Table S1.2.					