

## **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/UP3237ES  
The Operator is: Sofidel UK Ltd  
The Installation is: Lancaster (North) Tissue Mill  
This Variation Notice number is: EPR/UP3237ES/V002

#### **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.

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 5, 6, 47, 53 In relation to this/these BAT Conclusion(s), we have accepted the operators proposed improvements should achieve compliance and have;

included Improvement Condition *IC1* in the Consolidated Variation Notice to ensure that the requirements of the BAT Conclusion 53 are delivered before 30 September 2018. See Annex 1 for details, and;

identified where further proposed techniques to deliver BAT Conclusions 5, 6, and 47 before 30 September 2018 should be monitored. See Annex 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.

For Discharges to Sewer we have removed monitoring requirements for dangerous substances, other than those specified in the twice annual screen detailed in Section 2.4a.

## **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	<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, 8, 9, 10, 11,13, 14, 15, 16, 48, 49, 50, 51 (See annex 5)
	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, 12, 17, 18, BAT Conclusions for Papermaking and Related Processes 47, 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; BATc 53  We have set IC 1 to track compliance with BATc 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**

BAT Conclusions for the production of Pulp and Paper.

BAT AEL`s do not apply to this installation as waste water is directed to sewer.

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 we have accepted that the current waste water flow is well within the applicable range

<b>BAT Associated Waste Water Flow (m<sup>3</sup>/Adt)</b>		<b>Performance at time of Permit Review (m<sup>3</sup>/Adt)</b>
Non-integrated paper mill	3.5 - 20	13

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 3. 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 30 September 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 30 September 2018.</li> <li>3) Any alterations to the initial plan – for progress reports.</li> </ol> <p>The report shall address BATc 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>
IC2	<p>The Operator shall submit to the Environment Agency for approval, a report detailing the process monitoring required under Table S3.4 of this permit, for particulate emissions from air emission points A3 and A6 listed in table S3.1 of this permit. The submission shall make reference to techniques used to minimise and manage the release of particulate matter including; the source of particulate matter; available abatement/control measures; monitoring techniques/methods and inspection frequencies.</p>	07/06/17

IC 3	<p>The Operator shall undertake a drainage survey/review of the drainage arrangements to ensure that the process and surface water drains are accurately identified and recorded. The drainage plans shall be updated accordingly and shall identify emission points to sewer and controlled waters.</p> <p>Copies of the updated drainage plans shall be submitted to the Environment Agency.</p>	01/03/17
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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 3.1.3 it will comply with the revised requirements under IED

### **Waste Acceptance**

We have confirmation the process no longer used recycled fibres so we have removed conditions permitting, and associated with the acceptance of waste.

### **Management of particulate emissions from tissue mills**

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 the data held on emission points to air from various dust extraction/emission points on site (also) appears to be inaccurate and out of date with current operations on site.

We have therefore set an improvement condition (IC2) requiring the Operator to submit for approval a report that details both the emission points and how the process monitoring as required by Table 3.4 will be conducted. The report will also detail monitoring/abatement technologies employed and inspection frequencies proposed.

### **Air Emissions**

We have incorporated three existing air emission points (A4, A6, A7) in Table 3.1 for completeness.

### **Water Emissions**

The operator proposes to revise surface water drainage arrangements. We have included IC3 for the submission of revised drainage proposals and incorporated the proposals as an operating technique in Table S1.2.

**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>  CC/FC/NC/NA	<b>Compliance assessment conclusion</b>  CC/FC/NC/NA	<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>	1.1.1	CC	CC	Evidence of application of relevant techniques provided in Regulation 60 response  The operator maintains an EMS externally certified to ISO 14001	Validate compliance by Inspection
<b>Raw materials: BAT 2</b>	1.3.1	CC	CC	Evidence of techniques detailed in response, including chemical inventory, controls for management and use of chemicals.	Validate compliance by Inspection
Raw materials: BAT 3	1.3.1	NA	NA	Regulation 60 response confirmed	None

<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>
				Hydrogen Peroxide is not used	
Raw materials handling: BAT 4	1.1.1	NA	NA	Regulation 60 response confirmed no wood pulping occurs	None



<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>Water usage: BAT 5</b>	<b>1.3.1</b>	<b>CC</b>	<b>CC</b>	<p>Evidence provided of techniques currently applied as well as identifying other applicable techniques to be implemented by 2018.</p> <p>Associated wastewater flows at 13.5m<sup>3</sup>/ADT are within benchmark (3.5 – 20m<sup>3</sup>/ADT)</p> <p>We have accepted the Reg 60 response as being compliant although some BAT techniques are not currently installed.</p>	<p>Validate compliance by Inspection</p> <p>Review Implementation of proposals for BATc 5 (techniques (d) and (e))</p>

<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>Energy consumption: BAT 6</b>	1.2.1	CC	CC	<p>Evidence provided of techniques currently applied as well as identifying other applicable techniques to be implemented by 2018 associated with major rebuild of the mill.</p> <p>We have accepted the Reg 60 response as being compliant although some BAT techniques are not currently installed.</p> <p>Energy Management Restricted to EMS</p>	<p>Validate compliance by Inspection</p> <p>Review Implementation of proposals for BATc 6 techniques (g) and (i)</p> <p>Review how EMS satisfies BATc 6 (a) for an Energy Management System into EMS.</p>
Odour control: BAT 7	3.3.1	CC	CC	Evidence of relevant techniques	Validate compliance by 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>
				provided in response  Operator is planning to change open tanks to closed and improvements to management of pulper rejects	<b>Review improvements to pulper rejects identified in response</b>
Monitoring process: BAT 8	3.5.1	NA	NA	No Effluent Treatment Plant	None
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>NA</b>	<b>NA</b>	<b>Installation Discharges to Sewer</b>  <b>Operator has proposed to increase frequency of monitoring to comply with BATc</b>	None  Operator identified in response they intended to increase monitoring suite to comply but don't need to

<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>
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>  <b>Sludge no longer sent to landfill but recovered in process</b>	<b>Validate compliance by Inspection</b>
Emissions to water: BAT 13	1.3.1	NA	NA	Installation discharges to Sewer	None
<b>Emissions to water: BAT 14</b>	<b>1.3.1 &amp; 2.3.1</b>	<b>NA</b>	<b>NA</b>	<b>Installation discharges to Sewer</b>	<b>None</b>
Emissions to water: BAT 15	2.3.1	NA	NA	Installation discharges to Sewer	None
Emissions to water: BAT 16	2.3.1	NA	NA	Installation does not operate biological treatment	None

<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>Noise control: BAT 17</b>	3.4.1	CC	CC	Evidence provided that techniques associated with BATc are used. No evidence of noise complaints  Further work on acoustic enclosure and upgrading building fabric have been proposed	Validate compliance by Inspection
Decommissioning: BAT 18	3.1.3	CC	CC	Evidence provided that techniques associated with BATc are in place.	Validate compliance by Inspection  Closure plan may need updating after refurbishment
<b>Paper making waste water: BAT 47</b>	1.3.1	CC	CC	Response details a range of techniques used.  Clarified waters produced through DAF's	Validate compliance by Inspection  Review opportunities associated with

<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>stock re-alignment investment</b>  <b>Review whether treatment of clarified to superclarified would improve water use as used elsewhere in the group</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 management: BAT 49	1.3.1	NA	NA	Coating not used at this Installation	None
Paper making water emissions: BAT 50	1.3.1 & 3.5.1	NA	NA	Installation discharges to Sewer. BAT AEL's do not apply	None
Paper making Volatile Organic Compounds: BAT 51	3.2.1	NA	NA	Regulation 60 response detailed no on-line coating	None

<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>Paper making waste generation: BAT 52</b>	1.4.1	CC	CC	The response identifies suitable techniques are installed.	Validate compliance by Inspection
<b>Paper making energy consumption: BAT 53</b>	1.2.1	CC	FC	The Regulation 60 response identifies only 3 techniques specified under BATc 53 are installed at Lancaster Mill.  The response proposes a number of planned projects to progress towards compliance with BAT by 2018.	We have set IC1 to track progress against future compliance with BATc 53
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 stated that current site report is considered fit for purpose, although it has not been reviewed since the original	Validate compliance by Inspection to ensure Operator amends site report where necessary, including the requirement for

<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>
				permit issue. Records of incidents have been maintained and a review containment infrastructure undertaken. The baseline condition of land and groundwater is traceable to the original report. The site report should be further reviewed and amended in order to comply with IED.	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.					