

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2010

Devon Valley Limited

Hele Paper Mill

Hele

Exeter

Devon

EX5 4PL

Variation application number

EPR/TP3935MR/V005

Permit number

EPR/TP3935MR

Hele Paper Mill

Permit number EPR/TP3935MR

Introductory note

This introductory note does not form a part of the notice.

The following notice gives notice of the variation and consolidation of an environmental permit.

Changes introduced by this statutory review

This variation has been issued to update some of the conditions following a statutory review of the permits in the industry sector for the production of pulp, paper and board. The opportunity has also been taken to consolidate the original permit and subsequent variations.

The Industrial Emissions Directive (IED) came into force on 7th January 2014 with the requirement to implement all relevant Best Available Techniques (BAT) conclusions as described in the Commission Implementing Decision. The BAT conclusions for production of pulp, paper and board were published on 30 September 2014 in the Official Journal of the European Union (L284) following a European Union wide review of BAT, implementing decision 2014/687/EU of 26 September 2014. The relevant BAT conclusions that apply from 1 October 2018 are 1, 2, 5 to 8, 10, 12, 13, 14, 16, 17, 18, 47, 48, 50, 52 and 53. The operator is compliant with the exception of BATc, 1, 2, 6, 10, 17, 18 and 53. We have set an improvement condition to track progress against future compliance for BATc 1, 2, 6, 18 and 53.

The schedules specify the changes made to the permit. Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the changes being made. Only the changes specified in schedule 1 are subject to a right of appeal.

Brief description of the process

The Installation comprises of industrial plant for the production of speciality papers, principally from virgin fibre, with capacity to produce up to approximately 60 tonnes per day. The installation is located in the Culm Valley in Mid Devon and is bisected by the River Culm.

The Installation performs raw material storage and handling, raw water treatment, hydro pulping and preparation of fibre 'stock', paper formation using a continuous mesh 'wire', drying using presses and steam heated and direct fired rolls, reeling and storage of finished product (bulk paper reels).

Steam is produced in two gas fired boilers (No.1 boiler is 8.5MW & No.2 is 9.5MW thermal input). Process water is treated using a physio-chemical and biological treatment system prior to discharge of treated effluent to the River Culm.

The principal raw materials are virgin fibres which are mainly imported, water, plus a range of chemicals used to maintain product quality and prevent the loss of raw materials to waste. Natural gas is the combustion fuel used.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application EPR/BJ9231IW/A001 received	28/02/01	Application for paper mill
Permit EPR/BJ9231IW determined	26/03/02	
Variation BT4281IZ determined	14/10/02	
Transfer Permit BX6707IZ	Effective from 31/03/04	
Variation SP3430LY determined	09/01/06	
Transfer Permit EPR/TP3935MR/T001	Effective from 23/11/06	
Variation EPR/TP3935MR/V002	05/08/08	
Environment Agency Paper and Pulp Sector Review 2011 Variation determined EPR/TP3935MR/V003	01/09/11	Varied and consolidated permit issued in modern condition format
Agency variation determined EPR/TP3935MR/V004	27/02/14	Agency variation to implement the changes introduced by IED
Regulation 60 Notice dated 21/11/14 (Notice requiring information for statutory review of permit)	Response Received 25/03/15	Technical standards detailed in response to the information notice. Information to demonstrate that relevant BAT conclusions are met for the production of pulp, paper and board as detailed in document reference L284.
Request for further information dated 16/10/15	Response Received 18/12/15	Request for further information.
EPR/TP3935MR/V005 (variation and consolidation) determined (Billing Ref: MP3035AX)	29/07/16	Statutory review of permit - BAT Conclusions published 30 September 2014 Varied and consolidated permit issued

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2010

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2010 varies and consolidates

Permit number

EPR/TP3935MR

Issued to

Devon Valley Limited (“the operator”)

whose registered office is

Environment House

6 Union Road

Nottingham

Nottinghamshire

NG3 1FH

company registration number **05856056**

to operate a regulated facility at

Hele Paper Mill

Hele

Exeter

Devon

EX5 4PL

to the extent set out in the schedules.

The notice shall take effect from 29/07/2016

Name	Date
SIMON HEWITT	29/07/2016

Authorised on behalf of the Environment Agency

Schedule 1

The following conditions/tables were changed by the consolidated permit EPR/TP3935MR as a result of an Environment Agency initiated variation:

CONDITIONS	
2.3.2	amended to current permit template format
3.1.3	added to reference table S3.3.
3.1.4	added to implement the requirements of the IED
3.2.2	amended to current permit template format
3.3.2	amended to current permit template format
3.4.2	amended to current permit template format
3.5.1	amended to implement the requirements of the IED
4.3.1 and 4.3.2	amended to implement the requirements of the IED
4.4.2	amended to implement the requirements of the IED
Schedule 6	updated
TABLES	
S1.1	amended for clarity on description of activities
S1.2	amended to introduce new operating techniques
S1.3	amended to reflect current improvement conditions
S3.2	amended to revise Hazardous pollutants monitoring and remove requirements for monitoring sanitary pollutants to sewer
S3.3	added to include annual limits
S3.4	added to include process monitoring
S4.1	amended reporting requirements
S4.2	amended performance parameters
S4.3	amended reporting forms

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2010

Permit number

EPR/TP3935MR

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/TP3935MR/V005 authorising,

Devon Valley Limited (“the operator”),

whose registered office is

Environment House

6 Union Road

Nottingham

Nottinghamshire

NG3 1FH

company registration number **05856056**

to operate an installation at

Hele Paper Mill

Hele

Exeter

Devon

EX5 4PL

to the extent authorised by and subject to the conditions of this permit.

Name	Date
SIMON HEWITT	29/07/2016

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

1.1.1 The operator shall manage and operate the activities:

- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
- (b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Energy efficiency

1.2.1 The operator shall:

- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
- (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
- (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

1.3.1 The operator shall:

- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
- (b) maintain records of raw materials and water used in the activities;
- (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
- (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities;
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.
- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Total annual emissions from the emission points set out in schedule 3 tables S3.1 and S3.2 of a substance listed in schedule 3 table S3.3 shall not exceed the relevant limit in table S3.3.
- 3.1.4 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
 - (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

3.3.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
- (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

3.4.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:

- (a) point source emissions specified in table S3.2;
- (b) annual limits specified in table S3.3;
- (c) process monitoring specified in table S3.4.

3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.

3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 table S3.2 unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the performance parameters set out in schedule 4 table S4.2 using the forms specified in table S4.3 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.3 ; and
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.3 Notifications

4.3.1 In the event:

- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
- (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

4.3.2 Any information provided under condition 4.3.1 (a)(i), or 4.3.1 (b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
- (a) the Environment Agency shall be notified at least 14 days before making the change; and
 - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.
- 4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
- (a) a decision by the Secretary of State not to re-certify the agreement;
 - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
 - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made immediately, in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
A1	Section 6.1 Part A(1) (b)	Producing, in industrial plant, paper and board where the plant has a production capacity of more than 20 tonnes per day. One paper machine plus one mothballed paper machine.	From fibre preparation to storage of completed reels of paper.
A2	Section 5.4 Part A(1) (a)(i)	Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment	From transfer of effluent from the Mill to the effluent treatment plant through to discharge of treated effluent to the river.
Directly Associated Activity			
A3	Combustion Plant	Producing steam in gas / oil fired industrial boilers and heat in through air dryers	From combustion of fuel to release of exhaust gases to the atmosphere
A4	Water treatment	Treating raw water using chemical processes	The treatment of water in adjacent WTW through to its use in the paper making and steam raising process.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Original Application EPR/BJ9231IW/A001	The response to questions 2.3 and given in Section 2.3 of the application	28/02/01
Response to Schedule 4 Part1 Notice Response	The response to questions 8, 9	01/10/01
Further Information received following changes to operations at the installation	Covering letter concerning changes in operation Sections relating to: Raw Material Storage Starch Preparation Area Transformers Chemical Storage	24/01/02
Receipt of completed information to the regulation 60(1) Notice. requested by letter dated 16/11/15	Technical standards detailed in response to all BAT conclusion of the notice provided under Regulation 60 of Environmental Permitting Regulations. Best available techniques as described in BAT conclusions under Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions for production of pulp, paper and board	18/12/15

Table S1.3 Improvement programme requirements		
Reference	Requirement	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 <p>The report shall address the following BATc: 1, 2, 6, 18 and 53.</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>Progress reports by</p> <p>01/03/17</p> <p>01/09/17</p> <p>01/03/18</p> <p>01/09/18</p>
IC2	<p>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.</p>	31/12/17

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
-	-
-	-

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1	Boiler Stack	No parameters set	No limit set	-	-	-
A2	No 3 Paper Machine (Wet End) – Roof Vents	No parameters set	No limit set	-	-	-
A3	No 3 Paper Machine (Dry End) - Exhaust vents	No parameters set	No limit set	-	-	-
A4	No 5 Paper machine - 1 st Through Drier Exhaust	No parameters set	No limit set	-	-	-
A5	No 5 Paper machine - 2 nd Through Drier Exhaust	No parameters set	No limit set	-	-	-

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W4	Effluent Treatment plant	Flow Rate	79 litres/sec	Instantaneous	Continuous	MCERTS self-monitoring of effluent flow scheme
W4	Effluent Treatment plant	Maximum Daily Flow	6818m ³ /day	24 hours	Daily	MCERTS self-monitoring of effluent flow scheme
W4	Effluent Treatment plant	Mean Daily Flow	-	24 hours	Daily	MCERTS self-monitoring of effluent flow scheme
W4	Effluent Treatment plant	pH (units)	6 (min) 9 (max)	Instantaneous	Continuous	MCERTS Approved instrumentation
W4	Effluent Treatment plant	Temperature	30°C	Instantaneous	Continuous	Standard temperature sensor
W4	Effluent Treatment plant	Chemical oxygen demand (COD) or Total organic carbon (TOC) ^{note 1}	-	24-hour flow proportional sample	Daily ^{note 2}	COD: BS ISO 15705 TOC: BS EN 1484
W4	Effluent Treatment plant	Biochemical oxygen demand (BOD ₅)	40 mg/l	24-hour flow proportional sample	Weekly ^{note 4} (once a week)	BS EN 1899-1
W4	Effluent Treatment plant	Total suspended solids (TSS)	40 mg/l	24-hour flow proportional sample	Daily ^{note 2}	BS EN 872
W4	Effluent Treatment plant	Total suspended solids (TSS)	60 mg/l	Spot sample	Weekly ^{note 4} (once a week)	BS EN 872
W4	Effluent Treatment plant	Ammonia as N	5 mg/l	24-hour flow proportional sample	Weekly ^{note 4} (once a week)	ISBN 0117516139
W4	Effluent Treatment plant	Total nitrogen	no limit	24-hour flow proportional sample	Weekly ^{notes 2,4} (once a week)	BS EN 12260
W4	Effluent Treatment plant	Total phosphorus	no limit	24-hour flow proportional sample	Weekly ^{notes 2,4} (once a week)	BS EN ISO 15681- 1

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
						Or BS EN ISO 15681- 2
W4	Effluent Treatment Plant	AOX	-	24-hour flow proportional sample	Once every two months	AOX: BS EN ISO 9562
W4	Effluent Treatment Plant	Metals Total and Dissolved (Zn, Cu, Cd, Pb, Ni, Hg)	-	Spot sample	twice a year	BS EN ISO 15586
W4	Effluent Treatment Plant	Hazardous Pollutants screen ^{note 3}	-	Spot sample	twice a year	GCMS analysis at UKAS accredited laboratory
W5	Water treatment plant filter backwash	Suspended Solids	60mg/l	Spot Sample	Daily	BS EN 872
W2	Jagenberg reeler brake cooling water	No parameters set	No limit set	-	-	-
W3	Reeler brake cooling water	No parameters set	No limit set	-	-	-

Note 1: If TOC is already monitored as a key process parameter, there is no need to measure COD, however the correlation between the two parameters must be established and checked regularly.

Note 2: If internal rapid test methods are used, they must be cross referenced by external tests to EN or ISO standards monthly.

Note 3: Hazardous pollutants screen substances are: Chlorpyrifos, Cypermethrin, Endosulphan (A & B), 4-nonylphenols & Nonylphenol ethoxylates, PCP, TBT.

Note 4: Weekly samples should be collected by following a randomised sampling program as far as is practicable.

Substance	Medium	Limit (including unit)
Chemical Oxygen Demand (COD)	Water ^{note 1}	0.3 - 5kg/t ^{note 2}
Total suspended solids (TSS)	Water ^{note 1}	0.1 - 1kg/t ^{note 2}
Total nitrogen	Water ^{note 1}	0.15 - 0.4kg/t ^{note 2}
Total phosphorus	Water ^{note 1}	0.02 - 0.04kg/t ^{note 2}
Adsorbable organically bound halogens (AOX)	Water ^{note 1}	0.05kg/t ^{note 2}

Note 1: For integrated or multi product mills where the BAT AEL range has been calculated according to a mixing rule based on their share of the discharge, based on information supplied by the Operator, the Operator must notify the Environment Agency if the product/ raw material mix changes by more than 10% in any direction.

Note 2: All annual emission limits that impose BAT-AEL's for direct discharges to water apply from 01 October 2018.

Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Abstracted water inlet	Hazardous Pollutants screen ^{note 1}	Twice per annum as per discharge monitoring	GCMS analysis at UKAS accredited laboratory	Spot sample

Note 1: Hazardous pollutants screen substances are: Chlorpyrifos, Cypermethrin, Endosulphan (A & B), 4-nonylphenols & Nonylphenol ethoxylates, PCP, TBT.

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to water Parameters as required by condition 3.5.1	W4, W5	Every 6 months	1 January, 1 July

Table S4.2 Performance parameters			
Parameter <small>note 1</small>	Frequency of assessment	Units	Units
Water inputs to the Mill <small>note 1</small>	Annually	tonnes	m ³ /t
Water used in manufacturing <small>note 1</small>	Annually	tonnes	m ³ /t
Other inputs of water/moisture <small>note 1</small>	Annually	tonnes	m ³ /t
Water outputs <small>note 1</small>	Annually	tonnes	m ³ /t
Waste/raw material inputs <small>note 1</small>	Annually	tonnes	
Waste/raw material outputs <small>note 1</small>	Annually	tonnes	
Net total annual production <small>note 1</small>	Annually	tonnes	

Note 1: All to be monitored and reported in accordance with associated guidance note issued with the permit.

Table S4.3 Reporting forms		
Media/parameter	Reporting format	Date of form
Water	Form water 1 or other form as agreed in writing by the Environment Agency	2016
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	2016

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6

Interpretation

“accident” means an accident that may result in pollution.

“ADt” means Air Dried Tonnes (of pulp) expressed as 90% dryness. ADt for paper should be reported at “normal” or average moisture content for the production over the course of any one year, noted but not corrected.

“AOX” is adsorbable organic halides measured according to the EN ISO:9562 standard method for waste waters.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“background concentration” means such concentration of that substance as is present in:

1. for emissions to surface water, the surface water quality up-gradient of the site; or
2. for emissions to sewer, the surface water quality up-gradient of the sewage treatment works discharge.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2010 No.675 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

Metals monitoring as follows: Zn (Zinc), Cu (Copper), Cd (Cadmium), Pb (Lead), Ni (Nickel), Hg (Mercury).

Net production is as follows:

- (i) For paper mills: the unpacked, saleable production after the last slitter winder, i.e. before converting.
- (ii) For off-line coaters: production after coating.
- (iii) For tissue mills: saleable tonnes after the tissue machine before any rewinding processes and excluding any core.
- (iv) For market pulp mills: tonnage after packing (pulp at 90 % dryness, i.e. 'air dry' - AD).
- (v) For integrated pulp mills: net pulp production refers to the tonnage after packing (pulp at 90 % dryness, i.e. AD) plus the pulp transferred to the paper mill (pulp calculated at 90 % dryness, i.e. air dry). For the net paper production of the integrated mill refer to (i)

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

Total nitrogen (Tot-N). Total nitrogen (Tot-N) given as N, The sum of organic nitrogen, free ammonia and ammonium ($\text{NH}_4^+\text{-N}$), nitrites ($\text{NO}_2^- \text{-N}$) and nitrates ($\text{NO}_3^- \text{-N}$).

Total phosphorus (Tot-P). Total phosphorus (Tot-P) given as P, includes dissolved phosphorus plus any insoluble phosphorus carried over into the effluent in the form of precipitates or within microbes.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes (England) Regulations 2005, or List of Wastes (Wales) Regulations 2005, as appropriate, and in relation to hazardous waste, includes the asterisk.

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or
- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

“year” means calendar year ending 31 December.

