

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/TP3935MR
The Operator is: Devon Valley Limited
The Installation is: Hele Paper Mill
This Variation Notice number is: EPR/TP3935MR/V005

What this document is about

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

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

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

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.

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 25 March 2015.

We considered that the response did not contain sufficient information for us to commence determination of the permit review. We therefore issued a further information request to the Operator that asked them to complete the entire Regulation 60 spreadsheet again. Suitable further information was provided by the Operator on 18 December 2015.

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

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

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

Based on our records and previous experience in the regulation of the installation we consider that the operator will be able to comply with the techniques and standards described in the BAT Conclusions other than for those techniques and requirements described in BAT Conclusion 1, 2, 6, 18 and 53.

We have therefore included Improvement Condition IC1 in the Consolidated Variation Notice to ensure that the requirements of these BAT Conclusions are delivered before 30 September 2018. See Annexes 1 and 5 for details.

We have identified where further proposed techniques to deliver BAT Conclusion 10 (AOX to be added to monitoring), 17 (noise reduction programme only) before 30 September 2018 should be monitored. See Annex 5 for details.

2.3 Requests for Further Information during determination

Upon receipt of the second completed Regulation 60 Notice we determined that we had sufficient information to complete the review process.

2.4a Water Framework Directive (WFD)

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

A report has been produced detailing a monitoring programme conducted to assess the chemicals present in waste water and waste paper sludge from permitted paper mill sites to gather further information for WFD purposes and to assess compliance with restrictions. This report along with a review of historically monitored parameters has been used to rationalise the requirement for inclusion of these substances in this standard suite within the permit:

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

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

Metals

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

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

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

2.4b Assessment of substances liable to pollute

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

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	monitoring	All data below LOD	n/a	n/a	Remove from Permit
Cadmium	monitoring	All Data below LOD	n/a	n/a	Remove from permit

3 The legal framework

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

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

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

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

Annex 1: decision checklist regarding relevant BAT Conclusions

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

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

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

Table 3. Decision checklist for relevant BAT Conclusions			
	Summary of BAT Conclusion requirement for production of pulp, paper and board	Status NA/CC/ FC/NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	BAT Conclusions that are not applicable to this installation	NA	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; General BAT Conclusions 3, 4, 9, 11, 15 and BAT conclusions 49 and 51 for Papermaking.
	BAT Conclusions where we accept the operator's Reg 60 notice response that they are currently compliant and no further explanation is required.	CC	Pulp & Paper Production BAT Conclusions: General BAT Conclusions for the Pulp and Paper Industry 5, 7, 8, 12,13, 14, 16. BAT Conclusions for Papermaking and Related Processes 47, 48, 50, 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	FC	Pulp & Paper Production BAT Conclusions; 1, 2, 6 and 18 (de-commissioning plan) and 53 which have an associated Improvement Condition set 10 (AOX only), 17 (noise reduction plan only) are noted in Annex 5 to ensure progress is tracked but no IC set.

Table 3. Decision checklist for relevant BAT Conclusions

	Summary of BAT Conclusion requirement for production of pulp, paper and board	Status NA/CC/ FC/NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	BAT Conclusions where the Operator has responded that they are not compliant and have not submitted any plans to become compliant	NC	Pulp & Paper Production BAT Conclusions; None

Key Issues

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

In this case we have accepted that the current annual emissions are well within the applicable range based on the Operator submitting a series of recent monitoring data with assessment against most of the BAT AEL's. The data set does not show a value for COD; however taking the concentration and applying a COD/BOD ratio from the data supplied ; indicates compliance with the BATAEL for COD.

However, footnote 1 would apply to this site due to the very low grammage paper being produced on site and this will need to be considered should any exceedances of the BAT AEL range in table 21 be recorded.

BAT 50 Table 21

Substance	BAT AEL`s for Installation (kg/t)	BREF Source	Performance at time of Permit Review (kg/t)	Based on data from:
Chemical Oxygen Demand	0.3 - 5	BAT 50 table 21	Inferred 1.5kg/t from BOD results.	eg. Average 3 years data supplied in Regulation 60 response 2013-15.
Total Suspended Solids	0.10 - 1		0.062 kg/t	
Total Nitrogen	0.015 – 0.4		unknown	
Total Phosphorus	0.002 – 0.04		0.000145	
AOX	0.05		unknown	
Biochemcial Oxygen Demand			Approx 10mg/l	

Footnote 1. Mills having special characteristics, such as a high number of grade changes (e.g of > or = 5 per day as a yearly average) or producing very light weight speciality papers (< or= 30g/m² as yearly average) might have higher emissions than the upper end of the range.

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 no BATAEPL applies as it is a speciality mill.

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 5).

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 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>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 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>	31/07/17

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 and concluded that the existing report is not suitable under IED and have therefore added an improvement condition IC 2 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. This is to be submitted within 18 months from permit issue.

Installation Name Change

The name of the installation has been changed from Devon Valley Mill to Hele Paper Mill in order to differentiate between the installation site and the operating entity.

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

Compliance Issue Priority BAT indicated in Bold Text	Relevant Permit Condition	Compliance stated by Operator CC/FC/NC/NA	Compliance assessment conclusion CC/FC/NC/NA	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
Environment Management System: BAT 1	1.1.1	FC	FC	Evidence of application of relevant techniques provided in Regulation 60 response but noted that several aspects of ISO 14001 standard missing. Operator has undertaken to put them in place by Sept 2018 and is working towards achieving 14001 revised standard.	IC1 set to track and resolve.
Raw materials: BAT 2	1.3.1	FC	FC	Evidence of application of (a range of) techniques associated with BATC provided in Regulation 60 response but some key techniques such as raw material selection missing (techniques a & b)	IC1 set to track and resolve
Raw materials: BAT 3	1.3.1	N/A	N/A	Regulation 60 response confirmed Hydrogen Peroxide is not used	None
Raw materials handling: BAT 4	1.1.1	N/A	N/A	Regulation 60 response confirmed no wood pulping occurs	None

Compliance Issue Priority BAT indicated in Bold Text	Relevant Permit Condition	Compliance stated by Operator CC/FC/NC/NA	Compliance assessment conclusion CC/FC/NC/NA	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
Water usage: BAT 5	1.3.1	CC	CC	Various techniques identified as in use such as white water treatment and re-use some not but applicability restricted by food grade product. No BATAEPL applies as site a speciality mill. Water usage per tonne is high partly due to product being produced via an inclined wire PM	Keep opportunities to improve under review.
Energy consumption: BAT 6	1.2.1	FC	FC	Evidence provided in the Regulation 60 response identifying application of (a range) of techniques associated with BATC 6. Evidence submitted of ongoing management and reduction of energy use in part via recent ESOS audit and commitment given to install an Energy Management System	IC1 set to track and review progress towards installing an Energy Management System. More detailed reports referenced as being held on site.
Odour control: BAT 7	3.3.1	CC	CC	Not considered a significant issue for site	None
Monitoring process:	3.5.1	CC	CC	Evidence provided that relevant process monitoring is	None

Compliance Issue Priority BAT indicated in Bold Text	Relevant Permit Condition	Compliance stated by Operator CC/FC/NC/NA	Compliance assessment conclusion CC/FC/NC/NA	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
BAT 8				undertaken as specified here and in BATC 10	
Monitoring air: BAT 9	3.5.1	N/A	N/A	Regulation 60 response confirms no chemical pulping occurs	None
Monitoring water: BAT 10	3.5.1	FC	FC	Evidence provided that relevant monitoring is undertaken as specified in BATC 10 with exception of AOX monitoring which Operator has undertaken to add.	Validate compliance by Inspection
Odour control: BAT 11	3.3.1	N/A	N/A	Regulation 60 response confirms no pulping occurs	None
Waste management: BAT 12	1.4.1	CC	CC	Evidence provided that waste is segregated for application of Waste Hierarchy. Main waste arising from ETP (fibre & sludge)	Validate compliance by Inspection
Emissions to water: BAT 13	1.3.1	CC	CC	Regulation 60 response states high nutrient chemicals not used	None

Compliance Issue	Relevant Permit Condition	Compliance stated by Operator	Compliance assessment conclusion	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
Priority BAT indicated in Bold Text		CC/FC/NC/NA	CC/FC/NC/NA		
Emissions to water: BAT 14	1.3.1 & 2.3.1	CC	CC	Primary settlement , BAFF and final settlement with lamellas installed on site.	None
Emissions to water: BAT 15	2.3.1	N/A	N/A	No tertiary treatment required	None
Emissions to water: BAT 16	2.3.1	CC	CC	Concentrations of organic substances, Phosphorous shown to be within BAT AEL`s. No local indicators that further removal is needed.	Monitor results against annual load limits
Noise control: BAT 17	3.4.1	FC	FC	Highlighted that many techniques apart from noise ranking survey are in place	Validate compliance with noise survey by Inspection
Decommissioning: BAT 18	3.1.4	FC	FC	Operator has stated that no decommissioning plan in place for site. Hence IC set.	IC1 set to track and resolve
Recycled Fibre raw materials: BAT 42	1.3.1	N/A	N/A		None
Recycled Fibre water emissions: BAT 43	1.3.1	N/A	N/A		None
Recycled Fibre water	1.3.1	N/A	N/A		None

Compliance Issue	Relevant Permit Condition	Compliance stated by Operator	Compliance assessment conclusion	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
Priority BAT indicated in Bold Text		CC/FC/NC/NA	CC/FC/NC/NA		
management: BAT 44					
Recycled Fibre water AEL's: BAT 45	1.3.1 & 3.5.1	N/A	N/A		None
Recycled Fibre energy: BAT 46	1.2.1	N/A	N/A		None
Paper making waste water: BAT 47	1.3.1	CC	CC	Several techniques referenced; fibre/ filler recovery, water recirculation and white water for many wire sprays	None
Paper making water usage: BAT 48	1.3.1	CC	CC	Applicable only to Speciality Mills. Several techniques referenced; production runs, buffer tanks in use and low AOX wet strength agents.	None
Paper making water management: BAT 49	1.3.1	N/A	N/A		None
Paper making water emissions: BAT 50	1.3.1 & 3.5.1	CC	CC	Table 21 applies (speciality mill). However footnote 1 would also appear applicable if annual loads subsequently found to be beyond the upper end of the range.	Validate compliance by Inspection

Compliance Issue Priority BAT indicated in Bold Text	Relevant Permit Condition	Compliance stated by Operator CC/FC/NC/NA	Compliance assessment conclusion CC/FC/NC/NA	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
Paper making Volatile Organic Compounds: BAT 51	3.2.1	N/A	N/A	Regulation 60 response detailed no on-line coating	None
Paper making waste generation: BAT 52	1.4.1	CC	CC	Reg 60 response indicates only Broke re-use applicable and even that is restricted by product runs at the time.	Validate compliance by Inspection
Paper making energy consumption: BAT 53	1.2.1	FC	FC	Several techniques highlighted as applicable and to be further considered, such as heat recovery on boiler and vacuum survey to be conducted.	IC1 set to track and resolve.
Response to Question 4 of Reg 60: ability of site report to be considered as a site condition report under IED	3.1.4	FC	FC	Response clarified that site report is inadequate for the purposes of an IED site condition report and hence IC 2 inserted. Links to the need to produce a de-commissioning plan for BAT 18.	Validate compliance by Inspection to ensure Operator amends site report where necessary, including the requirement for periodic monitoring where justified.
Note permit condition 2.3.1 will require Operate to operate as per Regulation 60 response documents referenced in Table S1.2.					