

Compliance Assessment Report CAR_NRW0043519

Permit being assessed: BU2489IT.

For: Baglan Paper Mill, **held by:** Sofidel UK Limited

At: Brunel Way , Baglan Energy Park, Neath, Neath Port Talbot, SA11 2FP.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2023.

Parts of permit assessed: Annual 2023 Monitoring Returns.

NRW Lead Officer: Daren Pike.

Report sent to: Kerry Mackinnon, Environment Manager, on 20/02/2024.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A - Emissions and monitoring - Emissions to water, air or land	C3 Minor (Suspended)	High BOD results were due to several operational issues at the effluent plant
IR4A - Information - Records	Assessed (A)	
IR4B - Information - Reporting	Assessed (A)	
IR4C - Information - Notification	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
1	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
IR3A	Issues already resolved	Already completed

Compliance criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Introduction

This Compliance Assessment Report (CAR) form includes a review of the annual performance submission from Sofidel Ltd for 2023. This annual reporting is required by the environmental permit for the installation. The CAR also includes a review of the monitoring report submissions for emissions to air, water. The operator submitted their 2023 annual performance report on time and by the 31 January 2024 deadline. The submission is required by condition 4.2.2 of the environmental permit and replicated below for ease of reference:

4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales) each year. The report(s) shall include as a minimum: Permit Number EPR/BU2489IT Page 9 11/12/2019 (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 annual production/treatment data set out in schedule 4 table S4.4; and (c) the performance parameters set out in schedule 4 table S4.2 using the forms specified in table S4.3 of that schedule. (d) the functioning and monitoring of the incineration plant in a format agreed with Natural Resources Wales. The report shall, as a minimum requirement (as required by Chapter IV of the Industrial Emissions Directive) give an account of the running of the process and the emissions into air and water compared with the emission standards in the IED

The report submitted is attached and is summarised as follows:

In 2023 Sofidel UK Baglan were able to achieve all targets relating to energy and water set by the Corporate Department at the beginning of the year, and new targets are due to be assigned for 2024. We were also able to maintain zero waste to landfill in 2023. The monitoring data shows that Sofidel UK Baglan emissions are well within the levels set within the BREF document.

Schedule 5 Notifications

There were four Schedule 5 Notifications as required under clause 4.3 of permit as follows;

4.3.1 (a) In the event 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 Natural Resources Wales, (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) in the event of a breach of any permit condition the operator must immediately— (i) inform Natural Resources Wales, and (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;

(c) in the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on Permit Number EPR/BU2489IT Page 10 11/12/2019 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.

These conditions were complied with as per the permit.

The Schedule 5 Notification submitted as follows:

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

BU2489IT

Name of operator

Sofidel UK Limited

Location of Facility

Briton Ferry Papermill

Time and date of the detection

01.12.2023 09:00am

(a) Notification requirements for any activity that gives rise to an incident or accident which significantly affects or may significantly affect the environment

To be notified Immediately

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 permit condition
To be notified immediately
Emission point reference/ source
W1
Parameter(s)
BOD
Limit
25mg/l
Measured value and uncertainty
32mg/l
Date and time of monitoring
23.11.2023 10am
Measures taken, or intended to be taken, to stop the emission
Effluent resampled and cause currently being investigated.
Time periods for notification following detection of a breach of a limit
Parameter
Notification period
(c) In the event 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:
To be notified immediately
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.
We have investigated the high BOD result from 23rd November. It was caused due to an issue with our air blowers which had tripped out due to a power surge at the whole site. This caused a reduction in the amount of oxygen in the bioreactor. This reduced the quantity of bacteria in the system for a short period of time.
Measures taken, or intended to be taken, to prevent a recurrence of the incident
The equipment was reset, and we have increased the checks at the plants from once per day to once per shift. We have been recirculating the sludge back to the bioreactor to increase the amount of bacteria in the system. The sample results since the high BOD have come back in spec:
28.11.2023 = 3 mg/l
05.12.2023 = 6 mg/l
We will continue to monitor as part of our weekly monitoring requirements.
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.
02.12.2021- BOD Result high 37mg/l
04.05.2022- BOD Result high 29mg/l
11.05.2022- BOD Result high 59mg/l
26.05.2022- BOD Result high 34mg/l
04.10.2022- BOD Result high 34mg/l
11.10.2022- BOD Result high 37mg/l

15.11.2022- BOD Result high 29mg/l

13.12.2022- BOD Result high 29mg/l

23.02.2023- BOD Result high 34mg/l

25.04.2023- BOD Result high 30mg/l

Name*

Kerry Mackinnon

Post

Environment Manager

Signature

Date

20.12.2023

* authorised to sign on behalf of the operator

Conclusion

This CAR was undertaken on 20 February 2024. However, to ensure that the CCS score is attributed to the correct financial year (for billing) the date on CARS has been altered to 31 December 2023.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.