

## Compliance Assessment Report CAR\_NRW0046139

**Permit being assessed:** EP3034GS.

**For:** Llysonnen Mill, **held by:** Wynnstay Group PLC

**At:** Llysonnen Mill , Travellers Rest, CARMARTHEN, Dyfed, SA31 3SG.

**Type of assessment:** Report/Data Review,

**Reason:** Routine.

**On:** 31/12/2024.

**Parts of permit assessed:** Annual 2024 Monitoring Returns.

**NRW Lead Officer:** Daren Pike.

**Report sent to:** Sally Davies, QC & Compliance Manager, on 04/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	

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

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

No action required.

### 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) has been issued in response to the submission of the 2024 annual monitoring returns by Wynnstay Group plc (the operator) for activities at Llysonnen Mill, Travellers Rest, Carmarthen, Carmarthenshire, SA31 3SG under permit EPR/EP3034GS.

### Annual Reporting Requirements as required by condition 4.2.2

The Annual Report was submitted on 31 January 2025 in compliance with the permit requirements.

### Point Source Emission to Air Parameters (Air 1 Form) as required by condition 4.2.2

The annual submission included results for all parameters required over this period and are in compliance with the limits set out in the permit.

### Point Source Emission to Water Parameters (Water 1 Form) as required by condition 4.2.3

The annual submission included results for all parameters required over this period and are in compliance with the limits set out in the permit.

This CAR was undertaken on 4 February 2025. 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 2024. The Annual Report received from Wynnstay Group plc reported the following:

Permit Number: EPR-EP3034GS Operator: Wynnstey Group P.L.C.  
 Facility: Llysonnen Mill Form Number: Air1 04/12/2023

**Reporting of emissions to air for the period from 01/01/24 to 31/01/24**

Emission Point	Substance / Parameter	Emission		Reference Period	Result <sup>[1]</sup>	Test Method <sup>[2]</sup>	Sample Date and Times <sup>[3]</sup>	Uncertainty <sup>[4]</sup>
		Limit Value*						
A1	Particulate matter	20 mg/Nm <sup>3</sup>		Periodic	0.89	EN 13284-1	14/01/25 10:00 – 10:14; 10:16-10:31	+/-0.55
A2	Particulate matter	20 mg/Nm <sup>3</sup>		Periodic	2.9	EN 13284-1	14/01/25 10:38 – 10:53; 10:54-11:09	+/-0.7

- [1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.
- [2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with Natural Resources Wales is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.
- [3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.
- [4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.

\* Emission limit value expressed as mass of emitted substances per volume of waste gas under the following conditions: dry gas at a temperature of 273.15 K and a pressure of 101.3 kPa without correction for oxygen content.

Signed ..... *S. Davies* S. Davies..... Date.....31/01/25.....  
 (Authorised to sign as representative of Operator)

Permit Number: EP3034GS Operator: Wynnstey Group Plc  
 Facility: Llysonnen Mill Form Number: Water1

**Reporting of emissions to water (other than to sewer) and land for the period from 01/01/24 to 31/12/24**

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result <sup>[1]</sup>	Test Method <sup>[2]</sup>	Sample Date and Times <sup>[3]</sup>	Uncertainty <sup>[4]</sup>
W1	Total suspended solids	15 mg/l		80	Determination of Suspended Solids in water by gravimetric analysis as 105°C (In-house method) INORG-L10 ISO 17025	2/9/24	+/-10% of reported value
W1	pH	5.0 – 8.5		6.6 (lowest) 7.8 (highest)	Determination of pH in water by pH meter (In-house method) INORG-L01 ISO 17025	21/11/24 2/9/24	+/- 0.1 pH value
W1	BOD (5 day)	10 mg/l		23.4	Determination of BOD in water by titration (In-house method) INORG-L10 ISO 17025	2/9/24	+/- 7.5% of reported value

NRW were informed of the breach in permit levels for BOD & TSS. Reed Bed Refurbishment booked in for May 25.

The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values. Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with the Agency is used, then the appropriate identifier is given. In other cases the principal technique is stated, e.g. gas chromatography. For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given. The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.

Signed ..... *S. Davies* ..... Date 31/01/25...  
 (Authorised to sign as representative of Operator)

Permit Number: EP3034GS Operator: Wynnstay Group Plc  
 Facility: Llysonnen Mill Form Number: WaterUsage

**Reporting of Water Usage for the year 2024**

Water Source	Usage (m <sup>3</sup> /year)	Specific Usage (m <sup>3</sup> /unit output)
Mains water	1417.33	0.009289
TOTAL WATER USAGE		

Operator's comments:

Signed ..... *S. Davis* ..... Date...31/01/25...  
 (authorised to sign as representative of Operator)

Permit Number: EP3034GS Operator: Wynnstay Group Plc  
 Facility: Llysonnen Mill Form Number: Energy

**Reporting of Energy Usage for the year 2024**

Energy Source	Energy Usage		Specific Usage (MWh/unit output)
	Quantity	Primary Energy (MWh)	
Electricity *	5239.114 MWh	13621.6964	
Gas Oil	164230 litres	1740.838	
TOTAL	-	15362.534	Mwh/tonne 0.10069

\* Conversion factor for delivered electricity to primary energy = 2.6

Operator's comments :  
 Electricity data includes that generated by on site solar

Signed ..... *S. Davis* ... Date... 31/01/25  
 (Authorised to sign as representative of Operator)

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](mailto: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](mailto: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.