

Compliance Assessment Report CAR_NRW0046434

Permit being assessed: EP3738NG.

For: Bridgend Paper Mill EPR/EP3738NG, **held by:** WEPA UK Ltd

At: BRIDGEND PAPER MILLS , LLANGYNWYD, MAESTEG, MAESTEG, MID GLAMORGAN, CF34 9RS.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024 between 09:00 and 17:00.

Parts of permit assessed: Emissions, monitoring and waste.

NRW Lead Officer: Dale Padfield.

Report sent to: -, Energy & Environment Manager, on 24/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Action only (X)	
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
1	4

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
IR1A	No action required - imminent planned shut down and decommissioning of GT will render implementation of the wet NOx control uneconomical at this stage.	Already completed

Criteria	Action needed	Complete by
IR3A(2)	Please see actions 1 & 2 in main body of report.	31/03/2025

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

Bridgend Paper Mill

Emissions and reporting review and update – 31 December 2024

CHP GT NO_x emissions – Improvement Condition ref. IC9 Update

The wet NO_x control upgrades for the GT have not been installed, various issues, including the reverse power event in 2023 delayed the implementation. WEPA have since made an application to vary the permit, which will include the removal of the GT, and the instalment of several new package boilers to meet the sites heat and steam demands. Electricity will supplied via the grid, with WEPA benefiting from the British Industry Supercharger' (BIS) scheme.

As discussed in CAR_NRW0043493, a non-compliance with permit condition 1.1.1 was issued but suspended and considered resolved pending completion of IC 9.

Following the site visit on 30th April 2024, WEPA confirmed that the wet NO_x controls had not been installed, and given the likely decommissioning of the GT in 2025, were not planning to implement the upgrades. NRW stated that, given the GT was likely to be operational for another year, the controls should be installed, given the duration of continued operation and the NO_x savings that could be achieved. Additionally, it was stated that other installations had invested considerably in upgrading their GT's to achieve BAT standards.

During the visit, WEPA stated that the site would be on a temporary shut-down to allow for maintenance works on one of the Yankees. As discussed, this would have provided an opportunity to install the wet NO_x control upgrades without the site suffering additional down-time to install the improvements. However, WEPA reported limited availability of the contractors undertaking the work resulted in the improvement works not being made.

The NO_x emissions have been above the BAT standards for a significant period of time, the following non-compliance will be issued for the site failing to achieve BAT standards for CHP NO_x. The

following minor category 3 non-compliance will be issued. The non-compliance is evaluated as a category 3, as the emissions have not resulted in a breach of any air quality standards but will have a minor environmental impact.

Non-compliance: A category 3 non-compliance will be issued for the site failing to implement upgrades on the CHP to achieve BAT emissions standards for NOx. Permit condition 1.1.1.

Eel Regulation compliance update

WEPA report that some issues remain with the abstraction screen, mainly screen blinding during low river flow and the back-wash/flushing system struggling to clear the screen. WEPA plan on installing high powered pumps to improve the flushing system during low river flow.

Emissions review

Monitoring data and annual performance indicators for 2023 and the annual report for 2023 (condition 4.2.2 compliance) has been reviewed and no breach of permit conditions was identified.

The monitoring at emission point A4 was conducted outside the annual period, as it was conducted on the 08/01/2025, the permit specifies monitoring is conducted annually, meaning once a year, a the year is specified as the calendar year ending 31 December.

Action 1: please detail why the monitoring for emission point A4 was not conducted during 2024. Due 31/03/2025

Action 2: Please provide copies of the monitoring reports for emission points A1, A2, A3 and A4 for review. Due 31/03/2025

Water use is reported as having an overall downward trend (improved efficiency) however, the performance of the Jupiter machine appears to have shown a decline in the second half of 2024, with a doubling of the BRef target value of 20m³/ADT.

Action: WEPA to provide an update on the improved efficiency measures for water use on the Jupiter Machine during the next compliance meeting.

Annual river water abstraction use per tonne of paper produced has increased slightly on 2023 figures, but is still below historic usage. WEPA reported a decrease in the percentage of water available for re-circulation due to the chloride content impacting the various components within the Jupiter machine. The grade of stainless steel is susceptible to chloride, resulting in various issues. Investigative and remedial works are on-going to limit damage to the machine and find a solution.

Waste

Introduction of the new Welsh Government workplace recycling legislation has resulted in more waste generated at the site being sent for recycling.

Some outstanding actions remain ongoing, as detailed in CAR_NRW0043493, these will be discussed during the next compliance visit.

End.

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.