

Compliance Assessment Report CAR_NRW0049246

Permit being assessed: VP3635SY.

For: Cellulose Extrusion Plant , **held by:** Viscose Closures Ltd

At: 22 Ferryboat Close , Swansea Enterprise Park, Swansea, SA6 8QN.

Type of assessment: Site Inspection,

Reason: Routine.

On: 29/08/2025 between 09:50 and 11:40.

Parts of permit assessed: See Section 4.

NRW Lead Officer: Kirsty Thomas.

Report sent to: Viscose Closures Limited, Head of HR & PA, Head of Operations, on 24/09/2025.

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	Action only (X)	
IR2A - Installations - Operations - Permitted activities	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?

Criteria	Action needed	Complete by
IR1A	Action Ref CAR_NRW0049246.1 -Viscose to provide NRW with copies of the recent bund inspection and integrity checks, including sumps and provide an overview of any necessary and planned improvements.	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

This Compliance Assessment Report (CAR) captures a site familiarisation/site inspection undertaken by Natural Resources Wales (NRW) on the 29th August 2025. The site visit was undertaken at the Cellulose Extrusion Plant based in Swansea Enterprise Park.

The facility is operated by Viscose Closures Ltd (Viscose) under the environmental permit EPR/VP3635SY. Viscose manufactures hygienic cellulose rings for a variety of industries providing a self shrinking tamper proof seal on a large range of products.

Activities regulated by NRW under the environmental permit include the main activity of production of the cellulose rings along with Directly Associated Activities (DAAs) of raw material and waste handling, a steam raising boiler and effluent treatment.

This was a pre-arranged visit with an agenda as follows:

- Introductions
- Business and operations updates/overview
- Site tour of installation
- NRW/Viscose discussions regarding previous areas of concern (e.g. corrosion of tanks, bunds), maintenance and inspection work, improvement programmes and Site Protection and Monitoring Programme (SPMP).
- AOB - Boiler

Meeting Attendees

Viscose - Head of HR & PA, Head of Operations

NRW - NRW Lead Officer - Industry Regulation

Introduction and overview

An introductory meeting was held with Viscose representatives providing a high level overview of the site process and general business updates. The sites Health, Safety, Environment and Quality Manager has left the business and a new member of staff has been recruited.

Along with the environmental permit (EPR/VP3635SY) regulated by NRW for the Part A(1) activities, Viscose also hold permits for Part B activities which are regulated by the City and County of Swansea. Viscose have surrendered a Part B permit for the VOC plant associated with printing activities in summer 2025. Investment into a new printer has been made by the business which will no longer use solvent based inks (water based instead). A Part B permit remains in place for other printing activities undertaken at the site.

The facility operates on a batch process through a 3-4 week cycle. The plant was not operational during the time of this visit.

The business has also been seeking approved accreditation via "OK compost" which is a certification scheme that certifies products as compostable. The operator is in the final stages of obtaining this accreditation and is a commitment to the business aim of promoting circular economy, by helping to ensure products are compostable (can be returned to the biological cycle), rather than becoming waste.

Site tour observations

A site tour was undertaken with Viscose representatives providing an overview of site activities.

Yard area

The outside yard area was noted to be following good house keeping, with designated areas for waste which were well labelled.

Recent improvement to the Viscose intake point bund (raw materials bund) had been made in terms of a roof cover to help prevent excess rainfall entering the bund itself. A small amount of rainwater was present in the bund upon inspection following heavy rains the previous evening. The operator explained that the bund is routinely emptied and an automating pumping system is being installed in Q1 2026. The system will be suitable to remove liquid from the bund without being reliant on human intervention. It is important for the bund to retain its 110% capacity. It is noted that the operator was not processing at the time of this visit and the bund would be emptied imminently, well in advance of the next production run.

Other areas in the yard storing liquids (IBCs) that could cause pollution were within bunded areas.

The spent caustic tank located next to the hydrogen sulphide scrubber (emission point A1) had been recently replaced with a "like for like" tank.

The A2 emission point stack had also been replaced in the last few years and was reported to be in good working order.

Surface water drains within the yard area were clearly visible and identifiable by the blue painting. These on-site surface water drains are covered during deliveries in case of any spills. The site also had a readily available spill kit within the delivery area.

Process Building

The main processing building houses the cellulose extrusion plant as well as other activities such as printing, pigmentation preparation, packaging etc.

Undiluted viscose (raw material) is delivered to site and undergoes a series of processing to produce the end product. The process involves a variety of chemicals/acids (bulk raw materials such as sulphuric acid and caustic soda), which are stored within bunded tanks. Other raw material fluids are stored in IBCs.

As this was the first visit for the new Site Officer, a detailed site inspection was not

undertaken. However, concrete damage and corrosion damage was noted and further improvements must be considered as part of the sites continuous improvement plans. The operator has made improvements to the extrusion line tanks following thickness measurements of structural parts, thickness measurements were written on the structures. The operator explained that tanks are tested to check steel thickness. Thickness testing is also undertaken for the setting tanks.

Further improvements are planned.

The cold wash water tank and sulphuric acid tank of the extrusion line and their structures are in poor condition. The operator has identified this and these tanks are to be replaced by the end of the year. This is a welcomed improvement.

The dosing pump bund (B18) has undergone recent improvements following the report of its poor condition in previous bund inspection reports. The bund has been replaced by 2 drip trays enclosed by perspex guards. The operator has confirmed that suitable containment capacity is provided.

The operator explained how changes to the ammonia sulphate hopper will be undertaken next year to bring the system down to ground level and will be more efficient. The system is now an automated dosing system which will help reduce the amount of ammonia used for doing which can result from human error.

Overall, NRW welcomes the improvements made to date. Degradation of concrete within the processing buildings and acid damaged/corroded pipework, tanks etc is still an area of concern. As previously mentioned, the operator has made some improvements to date and will be continuing to make improvements as part of their continual improvement plan. The site also has a preventative maintenance scheme in place. This includes the inspection and regular maintenance of the primary and secondary containment systems in line with the agreed schedule (Figure 1):

The operators Site Protection and Monitoring Programme (SPMP, September 2023) outlines: 'all inspections were undertaken in line with the inspection regime (table below) and no concerns raised. Continuous preventative maintenance on bunds pipework, tanks, road surfaces etc. is carried out'.

Inspection item	Current inspection regime		
	Specific item	Time interval	Carried out by
Tanks	Tanks containing hazardous substances	12 months	Contractor
	All other tanks.	24 months	Contractor
Pipelines	Pipelines transferring caustic, sulphuric acid, steam and compressed air	6 months	Contractor
	All other pipelines.	24 months	Contractor
Bunds	-	6 months	In-house
Road surfaces	-	6 months	In-house
Grease interceptors	Surface water drains in yard and car park	24 months	Contractor

Figure 1

NOTE - Previous SPMP reports submitted to NRW included tank inspection time intervals of 6 months (tanks containing hazardous substances) and 12 months (all other tanks). Due to the nature of the process and materials susceptibility of corrosion, the previously agreed inspection intervals of 6 months and 12 months must be implemented.

Action - Viscose to provide NRW with copies of the recent bund inspection and integrity checks, including sumps and provide an overview of any necessary and planned improvements.

The operator submitted the latest bund inspection and integrity checks (inspections undertaken in December 2024). Some areas of the bunds were noted as being in poor condition (e.g B1 Viscose storage bund flooring). A Bund inspection summary was also provided documenting the corrective actions required to take place where poor conditions are identified. Viscose must implement the required corrective actions in a timely manner. The operator also provided the most recent sump inventory and inspection report. No failures of sump integrity were observed.

Recommendation: Viscose should consider having bund and road surfacing inspections undertaken by approve contractors/engineers. NRW are unclear on the credibility of such inspections being undertaken in-house.

Discussion points

Degradation for assets and flooring

As raised in previous Compliance Reports and as per the text above, the degradation of assets as well as the flooring within the process building are noted. The operator must ensure regular maintenance and inspection work is undertaken with improvements planned and implemented as a priority.

Site Protection and Monitoring Programme (SPMP).

Viscose submit a 2 yearly "Site Protection and Monitoring Programme" report to NRW. The last report was received in September 2023. An updated report will be submitted by the operator imminently.

Boiler

The sites 1.9MWth steam raising boiler is operating using natural gas in compliance with the permit. If the operator wishes to make any changes to the fuel type or substantially refurbish the boiler, this would likely require a permit variation and could have implications under the Medium Combustion Plant Directive (MCPD). Please refer to previous MCPD advice provided in compliance report CAR_NRW0042266 and CAR_NRW0036582 for further details. Additional advice is also available on the NRW website.

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.