

Compliance Assessment Report CAR_NRW0050254

Permit being assessed: EP3738NG.

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

At: Llangynwyd, Meesteg, Bridgend, MID GLAMORGAN, CF34 9RS.

Type of assessment: Site Inspection,

Reason: Routine.

On: 04/12/2025 between 10:30 and 12:30.

Parts of permit assessed: 1.1, 3.1, 4.3, .

NRW Lead Officer: Dale Padfield, accompanied by Greg Gardner.

Report sent to: -, Energy & Environment Manager, on 29/12/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR4C - Installations - Information - Notification	C3 Minor	4.3.1(b)
IR1A - Installations - Management - General Management	C3 Minor	1.1.1(b)
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.1
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR1E - Installations - Management - Avoidance, recovery and disposal of wastes produced by the activities	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
6	24

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(2)	Return to compliance.	Already completed
IR4C	See Action 1 below.	31/01/2026
IR1A	Action 1: Wepa must, a.) Ensure any staff responsible for monitoring aspects of the permit are fully aware of the relevant internal procedures. And b.) Ensure any relevant procedures are explicit in the requirement to provide notification to NRW in the event any permit condition is breached, regardless of the reason. Provide NRW with confirmation and a copy of any updated procedures once complete.	31/01/2026
IR3A(2)	No further action required. New permitted boilers no in place with the old CHP retired.	Already completed
IR3A(1)	Return to Compliance.	Already completed
IR1A	Ensure temperature alarm remains operational through the implementation of functional checks.	Already completed
IR1E	Action 2: Provide a list of wastes, including their safety data sheets, for the wastes being disposed of to the ETP via the Jupiter drain.	31/01/2026
IR1A	Action 3: Provide a copy of the sites chemical segregation policy, and any documents which detail chemical segregation procedures for the 'Jonathan' basement.	31/01/2026

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Wepa UK Limited EPR/EP3738NG

This compliance assessment form (CAR) details the following:

- Assessment of non-compliance in relation to the instalment of a temporary boiler.
- Assessment of non-compliance in relation to a breach of an emission limit value (ELV) at emission point A4 and failure to notify.
- Assessment of non-compliance in relation to a breach of an ELV at emission point W1.
- Site inspection undertaken on the 4th of December 2025

Emission point A4 – Jupiter Hood - ELV exceedance and notification failure.

Annual emissions monitoring for the 2024 period for emission point A4 ‘Jupiter Gas Hood’ was conducted on the 05/12/2024. During this monitoring campaign the concentration of NO_x over the measuring period was 67.7 mg/Nm³, which exceeds the permitted ELV of 40 mg/Nm³. As detailed below, the operator failed to notify NRW of this exceedance, therefore the score will be applied for the 2025 period. This exceedance is likely to only result in minor or minimal environmental impact as it is unlikely to result in the breach of any air quality thresholds. As such the following minor non-compliance will be issued.

Non-compliance: A minor category 3 minor non-compliance is issued for exceeding the permitted ELV for NO_x at the A4 emission point. Permit condition 3.1.2.

The operator failed to provide notification of this exceedance and had failed to report the exceedance on the annual returns reporting ‘Air 1’ form, with the result of a re-test conducted on the 08/01/2025 reported instead.

Wepa have stated this approach was taken as there were operational difficulties with the Jupiter paper machine during the monitoring undertaken in December 2025. This had resulted in the elevated NO_x concentrations. Wepa therefore did not see the monitoring as representative and scheduled a re-test.

As discussed following discovery of the exceedance, although the plant may not have been operating as expected it does not negate the fact that the permit had been breached. Although the permit only requires a single hourly average monitoring result for NO_x, it is expected that the operator is always within compliance with any permitted ELVs. The annual spot check is to provide assurance that the plant is continuing to operate within permitted levels. The single result required to be reported on the annual returns should not be the ‘best’ result obtained from numerous monitoring campaigns. The annual Air 1 reporting form has the following caveat for any results reported:

“[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.’

If an operational issue results in an ELV exceedance, although the result may not be representative of normal operation it is still a breach of the permitted ELV, which should be communicated to NRW via a schedule 5 notification. Permit condition 4.3.1(b) requires the operator to immediately inform NRW in the event that a permit condition is breached and to provide NRW with a Schedule 5 notification (permit condition 4.3.2) within the specified time on that schedule (within 24 hours of detection).

We rely on operators to undertake self-monitoring and expect transparency and honesty when submitting any data required by the permit. Failure to provide accurate information and notification of any exceedance of permitted ELV's damages integrity and brings into question the validity of reported monitoring data. The following non-compliance will be issued.

Non-compliance: A minor category 3 minor non-compliance is issued for failing to provide notification of a permitted ELV exceedance . Permit condition 4.3.1(b).

When non-compliances occur, NRW must also investigate the root cause to mitigate the potential of a re-occurrence. Wepa have a procedure for ensuring compliance with the monitoring requirements of the permit, titled PR-BR-7022_EN. Within this procedure there is a flow diagram detailing the steps to be taken during an air emissions monitoring campaign. The procedure details 4 steps to be taken in the event any results received are not within consent. Step 1: Submit a Schedule 5 notice to NRW. Step 2: Points to a separate procedure for raising non-conformances. Step 3: Requires corrective actions and the final step is to arrange a re-test. The operator has failed to follow the operating procedure. This has likely been a result of inadequate training of staff or ambiguity surrounding the requirement to notify when exceedances occur during process upset. As such, the following non-compliance will be issued against the management system as the root cause of the notification failure.

Non-compliance: A category 3 minor non-compliance is issued for the management system failure, namely the failure to follow operating procedures. Permit condition 1.1.1(b).

Action 1: Wepa 29/12/2025: Wepa must, a.) Ensure any staff responsible for monitoring aspects of the permit are fully aware of the relevant internal procedures. And b.) Ensure any relevant procedures are explicit in the requirement to provide notification to NRW in the event any permit condition is breached, regardless of the reason. Provide NRW with confirmation and a copy of any updated procedures once complete. **Due 31/01/2025**

Temporary boiler

A schedule 5 notification was received on the 7th of March 2025 detailing a partial 11kv discharge from the combined heat and power (CHP) plant. As a result, the CHP was shutdown following health and safety concerns and a temporary boiler was brought on to site provide process heat and steam.

The operator was requested to undertake a H1 screening assessment to demonstrate that any likely environmental impact from using the temporary boiler would be insignificant. Wepa provided the H1 along with a boiler details and the input details for the assessment. A further query was raised as the

operator had used a stack gas release height of 30m, with a note stating a 30 meter stack was 'to be installed'. When questioned, the operator stated that it had transpired that connection to the existing 30m stack was not possible, as such the tallest stack available, which could be safely installed on the temporary trailer boiler was 13.4m.

When the H1 was adjusted for this development, both the short and long term process contribution for NOx failed to screening out. This would usually require detailed modelling to evaluate any impact, however, this was not requested due to the temporary and relatively short timeframe the boiler would be on site.

The temporary boiler was stated to only be in use for 41 days, as such long term impacts, such as nitrogen deposition at local habitats are likely to be insignificant. However, there would have been potential for localised air quality impacts during the boilers use. The impacts would have been short term and relatively localised, as such the following minor non-compliance is issued.

Non-compliance: A category 3 minor non-compliance is issued for an unauthorised emission point, with the potential to lead to negative localised air quality impacts. Permit condition 3.1.1.

The root cause likely lies within the management for aspects of the CHP, as the degraded cable insulation required the CHP to be shut down and the need for the temporary boiler to be utilised. As the CHP has now been shut down permanently, this aspect will not be investigated further.

Temperature ELV exceedance at the W1 emission point.

A part 'A' schedule 5 notification was received on the 15th of August 2025 detailing an exceedance of the daily average effluent temperature released to the river Llynfi at emission point W1. The daily average was recorded at 25.8 degrees Celsius against a permitted limit of 25.0 degrees Celsius. River levels during this period were very low, however, as the average temperature is only marginally above the ELV it is likely that the elevated temperature of the discharge resulted in only minimal impact. As such, the following non-compliance will be issued.

Non-compliance: A category 3 minor non-compliance is issued for exceeding the daily average effluent temperature at emission point W1. Permit condition 3.1.2.

The ambient temperature in the days preceding the exceedance was above average, which likely had an impact on the effluent discharge temperature. The site is capable of re-circulating effluent, however, the temperature exceedance had gone undetected due to the alarm not being received by the security lodge. Investigation revealed that the alarm had been disconnected. This has now been reconnected and a functionality test is now in place to ensure the system remains operational. As the alarm forms part of the control system, functional checks should have formed part of the existing procedures. This is seen as a non-compliance with permit condition 1.1.1, whereby the operator has failed to minimise the risk of pollution. A minor non-compliance will be issued.

Non-compliance: A category 3 minor non-compliance is issued in relation to the procedures failing to identify and reduce the risk of exceeding the daily average effluent temperature ELV

at emission point W1. Permit condition 1.1.1.

No further action will be issued as the operator has now implemented corrective actions.

Site Inspection 4th December 2025

The site inspection was undertaken with the following agenda:

- Audit of primary abstraction license -
- Audit of temporary abstraction license -
- Inspection of hazardous waste and hazardous inventory storage

CAR forms will be issued separately for the abstraction licences, under the respective licence numbers.

The hazardous waste storage area was inspected. The hazardous waste storage area occupies a corner of the 'Jonathan' basement. The site uses a labelling and marking system to distinguish the contents of IBC's, where the contents differ from the original contents. The waste is not subject to storage segregation. No secondary containment is used for the hazardous waste liquids. The site mentioned that some wastes are disposed of via the Jupiter drain in a controlled manner for treatment within the ETP.

Action 2: Wepa 29/12/2025: Provide a list of wastes, including their safety data sheets, for the wastes being disposed of in this manner. **Due 31/01/2026**

The hazardous inventory storage was also located within the 'Jonathan' basement, IBCs being stored along dedicated racking, but with a number stored on ground in the surrounding areas, likely a result of the racking being at full capacity. The vast majority of the inventory was not provided with secondary containment, with only a small number of IBC's benefitting from a dedicated IBC bund tray. Signage was limited and it was not clear if there was a system in place to ensure correct segregation of chemicals. The inventory was comprised a mix of various chemicals, including those identified as corrosive, flammable, oxidising and ecotoxic. Hazardous inventory should be stored appropriately with correct segregation in place for incompatible substances. Guidance is available from the HSE regarding chemical segregation.

Action 3: Wepa 29/12/2025: Provide a copy of the sites chemical segregation policy, and any documents which detail chemical segregation procedures for the 'Jonathan' basement. **Due 31/01/2026.**

The basement has multiple drains which are reported to all drain to the sites ETP. With no secondary containment in place, it was stated that the drainage system is the containment measure as all escaped liquid will be captured and diverted to the ETP.

A routine check of our records revealed that the hazardous waste and inventory storage had previously been identified as non-compliant during a site inspection undertaken on the 06/08/2018 (compliance

assessment report ~ CAR_NRW0033799). This resulted in a category 2 non-compliance and a warning being issued, with the operator required to review the storage of hazardous inventory and waste in the Jonathan basement. A response was received from Wepa on the 21/09/2018 with the following action plan:

“In response to the above C2 warning received in your last CAR, an action team was formed and a number of meetings held to discuss the best way forward. The following actions were determined:

- A full inventory has been undertaken of all IBC's stored in Jonathan basement. There were 121 IBC's in storage some of which are redundant chemicals. These will be sorted through and disposed of. We will also plan to reduce our stock holding so that we hold the minimum number of IBC's that we need.*
- A concrete bund wall will be constructed in Jonathan basement which will surround the IBC storage area and provide at least 25% containment of the total storage capacity. The central redundant drains will be permanently blocked off with concrete and this will in effect provide an increase in the bunded area well above the 25% containment required and also provide a sump should there be a spillage. The existing racking will be modified to take account of the bund wall dimensions and extended to include the entire area. Bund wall dimensions will be 300mm high by 300mm deep and will be constructed with reinforcing bar and a chemical proof seal between the bottom of the bund wall and the existing floor. An overhead water pipe fitted to Jonathan basement roof and which has been identified for replacement will be rerouted to improve access to the racking system. This will help prevent spillage caused by a potential collision between the IBC and the overhead services.*
- A new bunded area storage area will be created in Jupiter basement in a location that is currently not used. This also has the advantage of being located away from any surface water drains. A bund wall of similar dimensions to Jonathan basement will be constructed using the roof support beams as corners. A small sump will be excavated in the centre of the floor to assist with any spillage that may occur in the bunded area. Either grid work or a new racking system will be purchased and fitted within the bund area for the IBC's to be loaded onto. Due to height restrictions in this area it will only be possible to store 1 IBC high but this should be adequate for the needs of the process. Again the bund will provide in excess of 25% of the total capacity stored in this area.*
- Both of these storage areas will be identified with appropriate signage stating how to deal with a spillage and also giving emergency contact details. The maximum number of IBC's that can be stored in these areas will be clearly stated and the area inspected in accordance with our usual procedures.*

- *An application for capital has been scheduled for next week to obtain funds to construct a bespoke Kymene storage facility in Jupiter basement. This system would be filled by tanker and this would prevent the delivery, storage, transport and point of use of IBC's of Kymene when making wet strength product on Jupiter. A significant quantity of the IBC's stored in Jonathan basement are of Kymene and moving to bulk storage would help reduce the overall inventory.*
- *Finally hazardous waste and waste materials will be held in the "diesel station" as they are now but these will be held on individual IBC bunds and pallet trays designated for the area. The largest amount stored in future will be up to one lorry load and as soon as this limit is reached they will be transported to the disposal site. There is a long term plan to renovate this building but the cost is significant and is unlikely to happen in the short or medium term. Until then stock levels will be kept to a minimum and stored on individual bunds."*

During the inspection on the 4th of December 2025, it was evident that no bund had been erected in the IBC storage area, the drains in the area were reported to still be connected to the ETP and hazardous waste was still being stored in the basement. The situation in the Jupiter basement is unknown as this wasn't inspected during the visit.

Further information has been sought with regards to these actions and will be subject to further assessment which will be captured in a separate compliance report.

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.