

Compliance Assessment Report CAR_NRW0050597

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: Report/Data Review,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: 3. Emissions and Monitoring, 4. Information.

NRW Lead Officer: Kirsty Thomas.

Report sent to: Viscose Closure Limited, Process Innovation & Environmental Manager, on 09/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	C4 No impact	4.2.2
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR4C - Installations - Information - Notification	C3 Minor	4.3.1
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR4B - Installations - Information - Reporting	C3 Minor	4.2.3

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

Total non-compliances recorded	Total non-compliance score
5	16.1

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
IR4B	The operator is to provide annual returns as required by Condition 4.2.2 of the environmental period EPR/VP365SY.	Already completed

Criteria	Action needed	Complete by
IR3A(2)	The operator is to undertake a root cause investigation into the permit limit exceedance and report findings to NRW. Any necessary corrective action identified from the investigation must be implemented urgently.	28/02/2026
IR4C	The operator is required to submit a Schedule 5 Notification to report the exceedance of the permitted Hydrogen Sulphide emission limit at emission points A1 and A2.	Already completed
IR3A(2)	The operator is to undertake a root cause investigation into the permit limit exceedance and report findings to NRW. Any necessary corrective action identified from the investigation must be implemented urgently.	28/02/2026
IR4B	The operator is to provide monitoring returns as required by Condition 4.2.3 of the environmental period EPR/VP365SY.	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.

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

This Compliance Assessment Report (CAR) is NRW's assessment of the 2025 annual monitoring returns submitted by the operator (Viscose Closures Limited) for the environmental permit EPR/VP365SY - Cellulose Extrusion Plant Facility.

Compliance Assessment - 2025 Annual Returns

Annual Performance

The operator is required to submit an annual report on the performance of the activities over the previous year by 31 January as per condition 4.2.2.

The annual submission consisted of the following documents:

- Form Air1 / 06/01/14
- Form Water Usage1 / 06/01/14
- Form Energy1 / 06/01/14
- Form Performance1 / 06/01/14

Information provided included the reporting of annual production of cellulose rings, water usage, energy usage, amount of viscose consumed, waste produced and total mercury in water.

Mercury in water - Total Mercury in water was reported to be 0.000477kg/year. This is below the annual limit set in Table S3.4 of 0.150kg/year and therefore in compliance.

Annual reporting/performance information was provided as required by condition 4.2.2. However, the operator submitted their annual report outside of the submission deadline. Late return of submissions is in contravention of permit condition 4.2.2.

Compliance breach - In accordance with NRW's compliance scoring guide, a non-compliance score of C4 has been recorded against sub-criteria IR4B - Reporting - Condition 4.2.2.

Monitoring

Monitoring data submitted (as required by condition 4.2.3) including detailed measurements taken of the following permit requirements:

- Schedule 3, Table S3.1 – Point Source Emissions to Air (Emission points A1 and A2).

A1 – Hydrogen Sulphide Scrubber Vent

Spot extractive sampling was carried out on 1 October 2025. Monitoring results for Carbon Disulphide (permit limit: 105 mg/m³) and Ammonia (permit limit: 190 mg/m³) were compliant and did not exceed the respective emission limits.

However, the measured concentration of Hydrogen Sulphide (permit limit: 2 mg/m³) was reported as 4.74 mg/m³, with an associated uncertainty of +/-0.28 mg/m³, therefore resulting in an exceedance of the permitted emission limit.

Compliance breach - The operator has failed to adhere to the emission limit of 2mg/m³ as specified within Schedule 3 Table S3.1. This is a contravention of condition 3.1.2 of the permit. Consequently, a noncompliance score of C3 has been attributed against compliance criteria IR3A(2) - Emissions to air.

NRW was not notified of this permit breach as required by condition 4.3.1 - via a Schedule 5 Notification.

Failure to notify NRW of the permit limit exceedance is a contravention of permit condition 4.3.1. In accordance with NRW's compliance scoring guide, a noncompliance score of C3 has been attributed against compliance criteria IR4C - Notification.

Action - The operator is required to submit a Schedule 5 Notification to report the exceedance of the permitted Hydrogen Sulphide emission limit at emission points A1 and A2.

Action now complete.

NRW requested the operator to submit a Schedule 5 Notification for the permit limit breach and provide further information on the incident, investigation undertaken to identify root cause and measures taken to prevent pollution/prevent the recurrence of the incident.

Schedule 5 Notification (A1) - The operator evaluated the process and checked to ensure extraction was passing through the caustic scrubber. The operator confirmed the following actions were taken:

- Hydrogen sulphide has been monitored on each subsequent run and has been found within specification using Hydrogen sulphide Drager Tubes (indicative result).
- The first mitigation was to check the extraction points, where a valve was found to be in a closed position. Once this had been opened, the ammonia level in the surrounding area dropped to a negligible amount. It has been proven previously that there is a direct correlation between ammonia and hydrogen sulphide generation.
- The second mitigation was to improve the scrubber alarm system with audible as well as visual alarms to ensure the correct levels are used within the system. Scrubber caustic concentration is taken twice daily to ensure there is enough sodium hydroxide to remove the hydrogen sulphide from the air stream.
- Repeat monitoring for the emission point is booked in with an external 3rd party contractor.

Action - The operator is to undertake a root cause investigation into the permit limit exceedance and report findings to NRW. Any necessary corrective action identified from the investigation must be implemented urgently.

The compliance assessment of the root cause of the incident has not been assessed at this time and is subject to further investigation.

A2 – Extraction from tanks 7- 14 RTTM

Spot extractive sampling was carried out on 1 October 2025. Monitoring results for Carbon Disulphide (permit limit: 17mg/m³) and Ammonia (permit limit: 10mg/m³) were compliant and did not exceed the respective emission limits.

However, the measured concentration of Hydrogen Sulphide (permit limit: 1mg/m³) was 2.34 mg/m³, with an associated uncertainty of +/-0.15mg/m³, resulting in an exceedance of the permitted emission limit.

Compliance breach - The operator has failed to adhere to the emission limit of 1mg/m³ as specified within Schedule 3 Table S3.1. This is a contravention of condition 3.1.2 of the permit. Consequently, a noncompliance score of C3 has been attributed against compliance criteria IR3A(2) - Emissions to air.

Again, NRW was not notified of this permit breach as required by condition 4.3.1 - via a Schedule 5 Notification.

Failure to notify NRW of the permit limit exceedance is a contravention of permit condition 4.3.1. In accordance with NRW's compliance scoring guide, a noncompliance score of C3 has been attributed against compliance criteria IR4C - Notification.

Non-compliance scores for the failure to notify NRW for emission points A1 and A2

have been consolidated.

Action - The operator is to submit a Schedule 5 Notification for the breach of permit limit for emission point A2 for Hydrogen Sulphide.

Action now complete.

NRW requested the operator submit a Schedule 5 Notification for the permit limit breach and provide further information on the incident, investigation undertaken to identify root cause and measures taken to prevent pollution/prevent the recurrence of the incident.

Schedule 5 Notification (A2) - Viscose evaluated the process and checked to ensure extraction was passing through the caustic scrubber. The operator confirmed the following actions were taken:

- Hydrogen sulphide has been monitored on each subsequent run and has been found within specification using Hydrogen sulphide Drager Tubes (indicative result).
- The mitigation was to check the extraction points, where a valve was found to be in a closed position. Once this had been opened, the ammonia level in the surrounding area dropped to a negligible amount. It has been proven previously that there is a direct correlation between ammonia and hydrogen sulphide generation.
- Repeat monitoring for the emission point is booked in with an external 3rd party contractor

Action - The operator is to undertake a root cause investigation into the permit limit exceedance and report findings to NRW. Any necessary corrective action identified from the investigation must be implemented urgently.

The compliance assessment of the root cause of the incident has not been assessed at this time and is subject to further investigation.

Additionally, the operator submitted monitoring results (condition 4.2.3) outside of the submission deadline, further delaying NRW's awareness of the permit limit exceedances. Late return of submissions is in contravention of permit condition 4.2.3.

Compliance breach - In accordance with NRW's compliance scoring guide and given the permit limit breaches associated with the report, a non-compliance score of C3 has been recorded against sub-criteria IR4B - Reporting - Condition 4.2.3 for late return of submissions.

Action - The Operators is to provide monitoring returns as required by Condition 4.2.3 of the environmental period EPR/VP365SY.

Action complete.

Note: This CAR report and assessment was undertaken on the 09.02.2026. However, to ensure that any non-compliance scores are attributed to the correct financial year (for billing) the date on the CARS system has been altered to 31.12.2025.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.