

Compliance Assessment Report CAR_NRW0050801

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: 24/02/2026.

Parts of permit assessed: 1. Management.

NRW Lead Officer: Kirsty Thomas.

Report sent to: Viscose Closures Limited, Process Innovation & Environmental Manager, on 24/02/2026.

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	Action only (X)	
IR1A - Installations - Management - General Management	C3 Minor	1.1.1

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
IR3A(2)	Submit air monitoring results for emissions points A1 and A2 following the retesting of emissions. Monitoring to be carried out by a third party specialist.	31/03/2026
IR1A	Corrective action implemented as detailed in this report.	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) sets out the findings of the root cause investigation undertaken by the operator, Viscose Closures Limited, in relation to the recent hydrogen sulphide air emission exceedances.

As outlined in the previous compliance report (CAR_NRW0050597), the site exceeded its permitted limits for hydrogen sulphide at emission points A1 (hydrogen sulphide scrubber vent) and A2 (extraction from tanks 7–14 RTTM). Hydrogen sulphide is generated during the conversion of viscose into regenerated cellulose and is extracted via stacks A1 (which is abated through a wet scrubbing system) and A2.

An action was set requiring the operator to carry out a root cause investigation into these exceedances at emission points A1 and A2 and to report the findings to NRW. Any corrective actions identified as part of this investigation must be implemented without delay.

A summary of the operators root cause investigation and corrective action is as follows:

- There was no documented level control on the A1 scrubber to ensure the correct level of fluid is within the scrubber - no documentation for low and high level alarms. The operator deemed this inadequate and implemented the following corrective actions:
 - A scale placed on the sight glass of the scrubber to allow for a fluid level value to be recorded alongside the caustic concentration reading taken twice daily.
 - A digital alarm system for high and low fluid levels has been installed. Evidence of this has been submitted by the operator.
 - A new scrubber control panel has been installed that will allow the development of the scrubber system (automating processes).
- Extraction over setting bath and make-up tank (these tanks generate hydrogen sulphide) - An additional valve was installed in the pipe when replaced and was found to be in a closed position. This resulted in the restriction of hydrogen sulphide extraction from the setting make-up tank through the correct ducting. The investigation identified that there was a lack of communication around the installing of the new pipework and the previous pipe did not contain an isolation valve. Once the valve had been opened, ammonia level in the surrounding area dropped (correlation between ammonia and hydrogen sulphide). The operators corrective action now includes:
 - Checking the valve is in an open position as part of startup checks - this must be carried out and documented before a production run has started,
- A retest of the stack emissions will be carried out by a third party specialist in early March 2026. Results will be shared with NRW.

- The operator monitored hydrogen sulphide levels with draeger detection tubes as an initial response. The results from these tests indicated that the process is currently operating within limits set in the permit. As above, formal third party stack testing will be carried out shortly to confirm air emissions are back in compliance.

Conclusion

The root cause investigation identified failings in the general management of activities which ultimately lead to pollution/exceedances of the air emission permit limits. NRW considers the failure to enact sufficient control measures to prevent pollution a contravention of permit condition 1.1.1. Consequently, a non-compliance score of C3 has been attributed against compliance criteria IR1A - General Management.

It is acknowledged that several corrective actions have been implemented following the incidents and the operator continues to review and implement continuous improvements at the site. No further action is required at this time. Should further emissions testing show non-compliance with the permit limits, NRW will review and consider further action.

All actions set in the previous compliance report (CAR_NRW0050597) are complete.

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 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.