

Compliance Assessment Report CAR_NRW0050975

Permit being assessed: DP3137EG.

For: Margam Green Energy Plant, **held by:** Margam Green Energy Ltd

At: Land off Longlands Lane, Margam, Port Talbot, Neath Port Talbot, SA13 2NR.

Type of assessment: Site Inspection,

Reason: Routine.

On: 04/03/2026 between 10:00 and 13:00.

Parts of permit assessed: See details.

NRW Lead Officer: Michael Launder, accompanied by Elliot Jones.

Report sent to: General Manager, Margam Green Energy Ltd, on 10/03/2026.

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	Assessed (A)	
IR2C - Installations - Operations - Operating techniques	Assessed (A)	
IR2E - Installations - Operations - Improvement programme	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?

No action required.

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**Introduction**

This Compliance Assessment Report was completed following a site visit by NRW on 4 March 2026. The aim of the visit was to review procedures for Other than Normal Operating Conditions (OTNOC) and new procedures for management of incoming waste wood. The Eco2 General Manager, Eco2 Assistant General Manager, BWSC Plant Manager, BWSC Operations Manager and BWSC QSHE Officer accompanied the NRW Industry Regulation officers during the visit.

Incoming Waste Fuel Inspection

During a previous site visit (CAR_NRW0045657), the waste fuel inspection process was observed, at the time sampling from near the top of waste loads at the weighbridge. To further improve biomass fuel contract compliance, the operator now has the option of diverting deliveries after the weighbridge to a further inspection area. A 360° grab is able to sample the entire depth of the load for inspection. This allows a more representative examination and further visual checking for hazardous waste in the load, as required by the EWC code specified in the permit, and allows the operator to check for other contractual non-conforming inclusions such as excess fines or other materials that may disrupt plant operation.



360° grab sampling from fuel delivery

Permit Compliance

The 2025 permit compliance and Schedule 5 notifications were discussed. These are assessed and scored separately in CAR_NRW0050732.

The operator reported the elimination of non-compliances due to ingress of tramp air into the air preheater - this accounted for several exceedances of half hourly CO limit up to 2025, when the plant outage allowed inspection and repair.

Work is ongoing to reduce instances of boiler wall slag formation. Without intervention, a slag layer builds up on the boiler wall until it peels off and falls into the combustion waste layer, breaking it up and disrupting the flame front leading to CO exceedances. The operator has been using automated boiler wall slag cleaning jets, which will be enhanced to reach areas identified as not adequately covered. Further to this, a trial will take place with an ash softening additive, to be sprayed onto the waste, to reduce slag formation.

Storage and management of incinerator bottom ash

During the visit, the area where IBA is stored was visited. The IBA bulk storage area has been improved to prevent run-off escaping the site and drainage is in place to capture residual leachate from wet ash. The operator is planning further improvements to prevent backwash of surface water into the IBA area.



Improved kerb to prevent run-off at IBA bulk storage area

The arising hazardous IBA from the site is still sent to Trecatti Landfill in Merthyr Tydfil (EPR-RP3733PC), to a cell that accepts stable, non-reactive hazardous waste.

Improvement Condition 12 - OTNOC Plan

The Other Than Normal Operating Conditions (OTNOC) Management Plan for Margam Green Energy was submitted by the operator on 31 January 2025.

The operator has used the Environment Agency template and has included appropriate OTNOC scenarios beyond start-up and shutdown.

During the visit, it was acknowledged that the EA template flows between guidance and template - it was suggested that the operator should, in further revisions of the plan, personalise the document to reflect the conditions specific to the Margam site and integrate the document into the wider site Environmental Management System and training.

The OTNOC conditions will be built into the operators emissions data logging and reporting software as a series of 'flags' to identify and exclude periods of abnormal operation during compliance reporting. This will allow the logging of OTNOC duration and frequency, and examination of any trends. NRW will review the implementation of the OTNOC plan during subsequent inspections and when monitoring returns are submitted.

The submitted document demonstrates compliance with the requirements of IC12 and the condition is discharged.

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.