Cyfoeth Naturiol Cymru
Natural Resources Wales

# Natural Resources Wales permitting decisions

# Tri-Wall UK Limited (Tri-Wall Monmouth)

# Decision Document

# New bespoke permit

**The application number is: PAN-031658**

**The permit number/the variation number is: EPR/DB3699ZD**

**The Applicant / Operator is: Tri-Wall UK Limited**

**The Facility is located at: Tri-Wall Monmouth, 77 Wonastow Road, Monmouth, NP25 5TW**

We have decided to grant the permit for Tri-Wall Monmouth operated by Tri-Wall UK Limited.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

## Purpose of this document

This decision document:

- Highlights key issues in the determination
- Summarises the decision making process in the decision checklist to show how all relevant factors have been taken into account

Unless the decision document specifies otherwise we have accepted the applicant's proposals. Read the permitting decisions in conjunction with the environmental permit. The introductory note summarises what the permit covers.

## Key issues of the decision

Our decision includes but is not limited to the following:

- Air quality
- Habitats screening

This will be discussed separately in this decision document.

## 1 Our decision

This Application is to operate a regulated facility which is subject principally to the Environmental Permitting Regulations 2016 (EPR), and the Medium Combustion Plant Directive (MCPD).

The permit contains many conditions taken from our standard Environmental Permit template including the relevant Annexes. We developed these conditions in consultation with industry, having regard to the legal requirements of EPR and other relevant legislation. This document does not therefore include an explanation for these standard conditions. Where they are included in the permit, we have considered the Application and accepted the details are sufficient and satisfactory to make the standard conditions appropriate. This document should be read in conjunction with the application and supporting information and permit.

## 2 The Legal Framework

The permit will be granted, under Regulation **13** of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- plant as described by Schedule 25A covering the Medium Combustion Plant Directive (MCPD)
- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed.

The permit will regulate two 5.69MWth boilers, fuelled by natural gas and used for steam generation as part of the manufacturing process for corrugated products. The boilers are permitted to operate for a maximum of 2384 hours per year.

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that this decision is consistent with its general purpose of pursuing the sustainable management of natural resources (SMNR) in relation to Wales, and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent significant damage to ecosystems. We consider that, in granting the Permit a high level of protection will be delivered for the environment and human health through the operation of the Facility in accordance with the permit conditions. NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources.

**Environment Wales Act 2016 – Biodiversity and resilience of ecosystems duty**

Section 6 of the Environment Wales Act 2016 requires that we seek to maintain and enhance biodiversity in the exercise of our functions, and in so doing promote the resilience of ecosystems, in a manner that is consistent with the proper exercise of our functions. NRW is satisfied that in this case we have taken into account and had due regard to this duty in so far as it is consistent with the function of determining an application for an EPR permit.

## 3 Air Quality

For this kind of regulated activity, the principal emissions are emissions to air. There are no permit conditions for water, land, energy efficiency, odour or noise and BAT does not apply.

The MCP is not situated within an Air Quality Management Area or within a zone outlined for action in the Clean Air Plan for Wales. It is also not classified as a Specified Generator, and therefore the requirement to assess emissions against the Air Quality Objectives for NOx are not applicable. As such, the applicant was not required to conduct a human health risk assessment.

### 3.1 Impact on Habitats sites, SSSIs, non-statutory conservation sites

The facility is within the relevant screening distance criteria for protected conservation sites. A full assessment of the application and its potential to affect any of the sites has been carried out as part of the permit determination process. The applicant has completed the Simple Calculation of Atmospheric Impact Limits (SCAIL) combustions screening tool to assess the impact of emission of NOx from the proposed MCPs.

### 3.1.1 National Site Network[1]/Ramsar sites

The following National Site Network/Ramsar sites are located within the relevant screening distance from the facility:

- SAC UK UK0012642 River Wye / Afon Gwy

The long-term process contributions (PCs) for airborne nitrogen, nutrient nitrogen deposition, and acid deposition were less than 1% of the annual Critical Levels and Critical Loads at this SAC. In line with AQTAG21 guidance[2], where the annual average is low (long-term PC <1%), the background concentrations of NOx would have to be extremely high to exceed the short-term critical level, therefore, there is no need to further consider short-term impacts. The screening tool used to model these results is a conservative model, and screens out PC based on worst-case scenarios, thereby making any significant impact from short-term NOx emissions even less likely.

An OGN 200 Form 1 (Habitats Regulation Assessment) was completed to assess the potential to affect the National Site Network/Ramsar sites, this is available on the public register.

**Appropriate assessment:**

In light of the conclusions of an appropriate assessment, it has been established that the project will not adversely affect the integrity of any National Site Network/Ramsar site, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans and projects. (As documented in section 4 of OGN 200 form 1)

**HRA Overall conclusion:**

In light of the conclusions of the appropriate assessment, it has been ascertained that the project will not adversely affect the integrity of any National Site Network/Ramsar site, as documented in section 4 of OGN 200 form 1.

### 3.1.2 SSSI Assessment

[1] National Site Network means the networks of sites in the United Kingdom's territory consisting of such sites as – (a) immediately before exit day formed part of Natura 2000; or (b) at any time on or after exit day are European sites, European marine sites and European offshore marine sites for the purposes of any of the retained transposing regulations.

[2] Air Quality Technical Advisory Group, AQTAG21: Habitats screening assessments – use of 1% long-term and 10% short-term screening thresholds for all EPR and IPPCR installations bar intensive farming.

The following Sites of Special Scientific Interest (SSSI) are located within 1.5 km of the installation:

- SSSI River Wye (Lower Wye) / Afon Gwy (Gwy Isaf)

The long-term process contributions (PCs) for airborne nitrogen, nutrient nitrogen deposition, and acid deposition were less than 1% of the annual Critical Levels and Critical Loads at this SSSI. Short-term impacts were not considered further due to the low annual average (see section 3.1.1).

An Appendix 4 Form was completed to assess the potential to affect the SSSI site, this is available to view on the public register. The assessment concluded the facility is not likely to damage any of the features of the SSSI site.

# Decision checklist

| Aspect considered | Decision |
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| **Receipt of application** | |
| Duly making | The Application was accepted as duly made on 29/07/2026. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination. |
| Confidential application | The Applicant made no claim for commercial confidentiality. |
| Identifying confidential information | We have not identified information provided as part of the application that we consider to be confidential. |
| Requests for information | In order for us to be able to consider the application duly made, we needed more information. We requested further information relating to Annex I information. The applicant was supplied with the "MCP and Annex I information" spreadsheet to populate with details pertaining to the two MCPs. Upon receipt of this information we were able to consider the application Duly Made.<br><br>A copy of the information notice and e-mails requesting further information were placed on our public register as were the responses when received. |
| **Operator** | |
| Control of the facility | We are satisfied that the Applicant (now the Operator) is the person who will have control over the operation of the facility after the grant of the permit. We are satisfied that the Applicant will be able to operate the facility so as to comply with the conditions included in the permit. This decision was taken in accordance with current guidance on legal operator for environmental permits. |
| **Operator competence** | |
| Relevant convictions | NRW's COLINS Database has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found.<br><br>The operator satisfies the criteria in RGN 5 on Operator Competence. |
| Financial provision | There is no known reason to consider that the operator will not be financially able to comply with the permit. The decision was taken in accordance with RGN 5 on Operator Competence. |
| Management system | The Applicant has confirmed in the application that an Environmental Management System (EMS) meeting the requirements for an EMS in our "*How to comply with your environmental permit"* guidance is in place. |

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| | We are satisfied that appropriate management systems and management structures will be in place for this facility, and that sufficient resources are available to the Operator to ensure compliance with all the permit conditions. |
| **The facility** | |
| The regulated facility | The regulated facility is subject to EPR because it carries out an activity as described in Schedule 25A of EPR:<br>• Existing Medium Combustion Plants at a specified location<br><br>The Operator has provided the grid reference for the emission points from the plant, and the activity is defined in Table S1.1 of the permit. |
| Annex I of MCPD | The information contained within Annex I of MCPD has been provided by the Operator and incorporated into the permit in Schedule 7. |
| **The site** | |
| Biodiversity, heritage, landscape and nature conservation | The application is within the relevant distance criteria of a site of nature conservation or habitat.<br><br>We have assessed the application and its potential to affect all known sites of nature conservation or habitats identified in the screening as part of the permitting process.<br><br>We have assessed the Operator's air emissions impact modelling report and consider that emissions will not affect any sites of nature conservation or habitats identified. See Key Issues section above. |
| **Environmental risk assessment** | |
| Environmental risk | For this kind of regulated activity, the principal emissions are emissions to air. We have reviewed the Operator's assessment of the environmental risk from the facility. The Operator's risk assessment is satisfactory. See Key Issues section above. |
| **Operating techniques** | |
| Operating techniques | We have specified the operating techniques and the operator must use the operating techniques specified in Table(s) S1.2A. |
| **Permit conditions** | |
| Use of conditions other than those from the template | Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template. |
| Emission limits | Emission limit value(s) (ELV) have been set for the following substances:<br>• Oxides of Nitrogen (NO and $NO_2$ expressed as $NO_2$)<br><br>Emission limit values are defined at a temperature of 273.15 K, a pressure of 101.3 kPa and after correction for the water vapour content of the waste gases and at a standardised $O_2$ |

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| | content of 15 % for engines and gas turbines, 6 % for solid fuels and 3 % for all other MCPs.<br><br>The ELV(s) have been set in line with the requirements specified within Schedule 25A EPR and technical guidance notes. |
| Monitoring | We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.<br><br>The monitoring requirements have been imposed in order to the Operator to demonstrate compliance with the emission limits specified in the permit, as per the ELV and monitoring frequency requirements specified within Schedules 25A of EPR and technical guidance notes.<br><br>The Operator will carry out monitoring in accordance with Monitoring stack emissions: low risk MCPs and specified generators - GOV.UK (www.gov.uk).<br><br>These decisions have been made in line with current relevant guidance |
| Reporting | We have specified the reporting requirements in Schedule 4 of the permit to ensure data is reported to enable timely review by NRW to ensure compliance with permit conditions. |
| MCPD/SG charges and subsistence fees | The type of application regarding MCPD/SG will have an associated charge. The MCPD/SG application type and number of plant will also form the basis for ongoing subsistence fees. More information on this can be found in our charging scheme on our website. |