

**Jayme Mountford
Alyn Works
Denbigh Road
Mold
Flintshire
CH7 1BT**

**Our ref: PAN-026033 (EPR/BU2349IL)
Your ref: EPR/BU2349IL**

Date: 19/07/2024

Dear Mr Mountford

Returning your permitting application

Application reference: PAN-026033

Operator: Synthite Limited

Facility: Mold Chemicals (Alyn Works), Alyn Works, Denbigh Road, Mold, Flintshire, CH7 1BT

Thank you for your application received 11/06/2024. We have started to assess your application but unfortunately there is a significant amount of information missing which we require for it to be determined. Your application is therefore not duly made, and we must return it to you.

Please see below for further detail on what information is missing. Note that given the issues identified, we have not completed a full duly making assessment and there may be further matters that need to be addressed.

- General risk assessment on the new plant. For more information see: [Risk assessments for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit)
- Air quality risk assessment- No screening tool and/or air quality modelling on the emissions of VOCs and Formaldehyde (including both new process and existing processes) in line with the guidance [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit)
- Information on how the new plant will comply with the Best Available Techniques (BAT) for the Production of Large Volume Organic Chemicals ([LVOC](https://www.gov.uk/guidance/best-available-techniques-bat-for-the-production-of-large-volume-organic-chemicals)).
- Information on any changes to management plans as a result of the addition of the new thermal oxidiser and formalin plant.
- Information on any changes or increase in raw materials stored on site as a result of the new plant and containment measures in place.
- New site plan showing the location of the new emission point and new plant equipment.
- Risk assessment on the proposal to remove the 30 m³/hour limit in line with the guidance [Surface water pollution risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/surface-water-pollution-risk-assessment-for-your-environmental-permit). Emission discharge point W1 has monitoring

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www.naturalresourceswales.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

requirements and limits which may need to be considered at higher flow rate as these could increase pollutant loadings into the watercourse. There is no proposed new limit to replace the 30m³/h.

You may resubmit your application. We strongly recommend that you review all parts of your application to ensure it meets our requirements. For further advice on your application before resubmitting, please call 0300 065 3000 and ask to speak to your local area office or your Site Officer.

We'll partially refund your fee separately (we will keep 14% of the fee in line with our charging scheme (page 61 here: [Contents \(naturalresources.wales\)](#))).

If you change how you operate your facility without us agreeing to the change and issuing you with a variation notice, you may be committing an offence and could be liable to prosecution.

If you have any questions please phone me on 0300 065 4448 or email William.Wallace@naturalresourceswales.gov.uk.

Yours sincerely

William Wallace
Senior Officer, Installation and RSR permitting