

Compliance Assessment Report CAR_NRW0048209

Permit being assessed: BU2349IL.

For: Alyn Works, **held by:** Synthite Limited

At: Denbigh Road, Mold, Flintshire, CH7 1BT.

Type of assessment: Site Inspection,

Reason: Routine.

On: 01/05/2025 between 10:15 and 12:00.

Parts of permit assessed: See Main Text.

NRW Lead Officer: Philip Harper, accompanied by Rick Prichard.

Report sent to: Technical Manager, Technical Manager, on 04/06/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.3
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	C3 Minor	3.1.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1a

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

Total non-compliances recorded	Total non-compliance score
3	12

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
IR3B	See actions in main text.	20/06/2025
IR3A(3)	See actions in main text.	Already completed
IR1A	See actions in main text.	Already

Criteria	Action needed	Complete by
		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

At 10:15 on the 1st May 2025, a site inspection as undertaken by NRW officers Phil Harper and Rick Prichard, Senior Industry & Waste Regulation. The site was operational at the time of the inspection.

New Formox Plant

A new formox plant has been built at Alyn Works by Synthite. The plant was commissioned on the 16th April 2025 despite the variation to legalise its operation not being finalised.

The operator should be reminded that the operation of the formox plant without a permit in place is an offence under the Environmental Permitting Regulations 2016.

Plant operating documents were inspected during the inspection. Whilst operating techniques for the new formox plant were available, they have not yet been integrated into Synthite's overarching environmental management documentation.

The operator has cited that they are in process of training staff to operate the new plant and integrating the new plant into Synthite's documentation. This process is expected to take approximately 1 month to complete.

Natural Resources Wales has taken the view that the operation of the new formox plant without the relevant permit being in place could lead to an adverse environmental impact as various aspects of the process have not been technically assessed by NRW through the permitting process.

Natural Resources Wales is currently determining non-compliance scoring at its enforcement response for the operation of the new formox plant. Scores will be applied in a later compliance assessment report.

Containment

IBCs

During the inspection IBCs were seen positioned in areas with no secondary containment. These were

containers of sodium hydroxide solution near the CF plant and IBC containers labelled as plant nutrient which were positioned on a ramp leading to secondary containment opposite the new TO plant.

IBC which contained various substances were also observed outside secondary containment areas around the CF plant.

IBCs that are stored without secondary containment present a greater risk to the environment during a loss event. NRW has taken the view that this is a permit breach against permit condition 3.2.3 “*All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.*”

A category 3 score has been applied under subheading IR3B Emissions of Substances Not Controlled by Emission Limits.

Secondary Containment Opposite the new TO Plant

During the inspection the bund opposite the new TO plant was inspected. Standing water with algal growth was observed within the bund. The operator is advised to empty the bund and check for integrity, in particular at the front right hand corner of the bund.

Action 1: Empty and inspect the bund by the **20th June 2025**.

Surface Water Transfer Pipe Leak

The raw effluent lagoons were inspected during the visit. Water levels in the lagoons appeared to be well below the top of the line. It should be noted however, that the pipe which carries surface water from the sites surface water sump into the lower lagoon was leaking in multiple locations causing water to be spilled onto unmade ground. This water has the potential to be contaminated from site activities, therefore, NRW regards this as an unpermitted discharge to ground activity and a breach against permit condition 3.1.1 “*There shall be no point source emissions to water, air, or land except from the sources and emission points listed in schedule 3 tables S3.1, S3.2 and S3.3*”.

A category 3 score has been applied under subheading IR3A(3) Emissions to Land.

A replacement of the pipe was already in progress when RW officers left the site.

The above breaches which relate to containment indicate that the site is not being managed in accordance with a robust environmental management system. In particular with regard to the effluent transfer pipe, it suggests that infrastructure is not being adequately inspected for the prevention of pollution as required by the sites own management systems.

A category 3 score has been applied under subheading IR1A for management.

Action 2: Ensure that inspections of the site for the prevention of pollution are being undertaken as specified by the sites environmental management system.

Kind Regards

Phil Harper

Senior Industry and Waste Regulation Officer NE

03000 65 3717/ 07890025506

philip.harper@cyfoethnaturiolcymru.gov.uk

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 only relating to the activity assessment
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 – Emissions to water, air or 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.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at 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.