

Judith Sartor
DOW Silicones UK Ltd
Cardiff Road
Barry
Vale of Glamorgan
CF63 2YL

**Our ref: PAN-026441
Your ref: EPR-BR9685IX**

Date: 16/09/2025

Dear Ms. Sartor

We need more information about your application

**Application reference: PAN-026441
Operator: DOW Silicones UK Ltd
Facility: Barry Plant, Cardiff Road, Barry, Vale of Glamorgan, CF63 2YL**

Thank you for your application received on 16/05/2025, and updated documentation received 21/08/2025.

Charging Tool

You have completed the charging tool using the 2023-2024 version of the charging tool, which is incorrect. Furthermore, you have not completed the listed activity tab on the charging tool. Consequently, the fee you sent is incorrect. It is our understanding that the proposed variation is to a S4.7 A(1)(a) listed activity. I have calculated the required fee using the 2025-2026 charging tool to be £9,237 (Band 1 bespoke permit variation). Taking into account the £1,943 already paid, please could you arrange payment for £7,294 details on how to pay can be found on [Natural Resources Wales / Apply to vary \(change\) a permit for installations](#).

Request for Information

I need to ask you for some more information before I can do any more work on it. Please would you address the following aspects of the application:

Application Form C2, Part 2d

You have ticked the box “yes” in relation to the question “are any of the regulated facilities low impact installations?”. However, you have not provided a document reference telling us how you meet the conditions for a low impact installation nor sent it in with your application form. Furthermore, you have not completed the low installation checklist in appendix 1.

Ebost/Email Chris.betteridge@cyfoethnaturiolcymru.gov.uk
Chris.betteridge@naturalresourceswales.gov.uk

Gwasanaeth Trwyddedu, Cyfoeth Naturiol Cymru, Adeilad y Goron, Parc Cathays, Caerdydd, CF10 3NQ
Permitting Service, Natural Resources Wales, Crown Buildings, Cathays Park, Cardiff, CF10 3NQ

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

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

Please could you check if the box was ticked “yes” in error, and if not, complete the document reference and low installation checklist. Applicable guidance can be found here:

[part-c2-guidance final.pdf](#)

Application Form C2, Part 2b

Please could you provide a non-technical summary in accordance with the C2 guidance (section 5c) which states that:

“This should include a summary of the regulated facility, a summary of the key technical standards and control measures arising from your risk assessment.”

Applicable guidance can be found here in the “Non-technical summary” section.

[Natural Resources Wales / Information needed in an installations Environmental Permit application](#)

Application Form C2, Part 5a

Please could you provide a site plan in accordance with the C2 guidance (section 5a). You need to provide a site plan in which the entire installation boundary is visible. Furthermore, the site boundary needs to be marked in green rather than blue. The site plan should provide a date and reference and be drawn accurately to a defined scale. The site plan will be included in the environmental permit.

Best Available Techniques

Please could you provide a Best Available Techniques (BAT) assessment, identifying which BAT conclusions (BATc) apply to your specific activity and how you are going to follow that BAT conclusion and meet any specified BAT-associated emission levels. The application makes reference to BAT-associated emission levels but does not specify the source of these levels. Applicable guidance can be found here:

[Best available techniques: environmental permits - GOV.UK](#)

Application Form C2, Part 3d3

Can you provide a summary of any changes to the management system and/or additional measures that are to be put in place to address the risks from the proposed changes. Please can you also confirm that the accident management plan will be updated in line with the proposed changes.

Application Form C2, Part 6

Air Quality

Please could you resubmit your H1 assessment including the new release point A130, with the correct effective stack height used, as described in the guidance here:

[Air emissions risk assessment for your environmental permit - GOV.UK](#)

Please could you also resubmit your H1 assessment using an effective height of release of 0 m for release points A126, A127, A128 and A129 in accordance with the guidance above which states:

“Treat the effective height of release as 0 metres when the emission is actually released at a point that’s either:

- *less than 3 metres above the ground or building on which the stack is located*
- *more than 3 metres above the ground or the building, but less than the height of the tallest building within a distance that's 5 times 'L'"*

Risk Assessment

Please could you also expand on the potential risks to the environment arising from the proposed installation in accordance with the guidance document here:

[Risk assessments for your environmental permit - GOV.UK](#)

"In your risk assessment you must identify whether any of the following risks could occur and what the environmental impact could be:

- *any discharge, for example sewage or trade effluent to surface or groundwater*
- *accidents*
- *odour (not for standalone water discharge and groundwater activities)*
- *noise and vibration (not for standalone water discharge and groundwater activities)*
- *uncontrolled or unintended ('fugitive') emissions, for which risks include dust, litter, pests and pollutants that should not be in the discharge*
- *visible emissions, for example smoke or visible plumes*
- *release of bioaerosols, for example from shredding, screening and turning, or from stack or open point source release such as a biofilter*

If you do not think any of them are significant risks, you will need to state why in your permit application."

Please reply within 10 working days from the date of this letter. If we don't hear from you we must return your application and fee. We will keep 14% of the charge to cover the cost of the assessment work done.

If you email or write to us please quote the application reference PAN-026441 on any correspondence and send it to the relevant address below.

When we receive the missing items we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter.

We'll assess your claim for confidentiality once your application is duly made.

Please quote our reference if you contact us. If you have any questions please contact me via email Chris.betteridge@naturalresourceswales.gov.uk.

Yours sincerely

Christopher Betteridge
Senior Permitting Officer (Secondment)