

Natural Resource Wales (NRW)

Our Ref: 315876/KB/L002/230625/0.1

Re: PAN-025487 Schedule 5 Request for information

Background

Duynie Ingredients Ltd (formally Novidon Ltd) submitted an application in March 2024 to formalise their operation. The starch production activity is carried out at Coed Aben Road, Wrexham Industrial Estate, Wrexham, Clywd, LL13 9UH (the Site).

NRW issued a request for more information via a Schedule 5 Notice on 12 May 2025. It was agreed to respond to this notice by Monday 23 June 2025.

The letter contains the information requests and associated response. NRW questions are presented below in bold, with responses in line-below.

Production of Large Volume Organic Chemicals (LVOC) – BAT Assessment

Submit a Best Available Techniques (BAT) Assessment for the LVOC sector.

A copy of the BAT Assessment for the LVOC sector is enclosed, see 318659 Duynie Ingredients - LVOC BAT Assessment (1.0) in Annex A.

Carboxymethylation Starch Modification

Provide an environmental risk assessment for the use of propylene oxide as confirmed in Section 2.1.1 of the In-process Controls “In addition, the Operator proposes to use propylene oxide in a separate starch modification process, see Section 2.3.”

The Operator has confirmed that they do not use, propylene oxide in their starch modification process. It is understood this was a previously held future plan and is no longer required.

The In-Process Controls document has been updated to remove mention of propylene oxide for completeness, see enclosed CE-WH-1801-RP01-IPC-V3-FINAL as Annex B.

Confirm that Emission Point A1 serves all five dryers on site via one 7.5m high stack, as per Section 2.2.2 of the In-process control document.

Following a site visit, it would appear that the 5 x dryers vent to air via individual emission points rather than a combined emission point via A1 as previously reported in error. Where necessary, the Air Emissions Assessment will be updated to reflect this change in understanding.

The In-Process Control document has been updated to reflect this for posterity see Annex B.



Plan Drawing ref CE WH 1801-DW02

Drawing CE-WH-1801-DW03 Rev A shows the location of two surface water discharge points SW1 and SW2 at the northern area of the site. Can you confirm if there is an opportunity to safely sample the surface water runoff after the penstock valves, towards the south of the site. We note that Report Ref: CE-WH-1801-RP11-BAT-V2-FINAL confirms that the penstock valves are located upstream of the two discharge points.

We can confirm that there are some access points after both penstock valves. The Drainage plan is updated to reflect the approximate positions of the point where clean surface water discharges into the brook. Sample points are possible post-penstock valve and pre-discharge, as shown on the updated Drainage Plan.

See enclosed updated Drainage Plan CE-WH-1801-DW02 Rev C as Annex C.

It should be noted that the drainage network at the Site is marginally more extensive than that shown on the Drainage plan. This information is based on a CCTV survey and subsequent hand-drawn drainage plan and the Arthian site visit in June 2025. It is recommended that a fresh CCTV survey is undertaken and the drainage plan prepared to scale.

Storage and Handling - Containment Internal Drainage and Effluent Storage Tank - Report Reference: CE-WH-1801-RP13

Confirm what liquids are collected and if they are waste or not. If the liquid is waste you will need to review and resubmit the table provided in your not duly made response, your ref: 315876/KB/11022025/1.0.

What are the containment provisions/bunding for the external effluent storage tank.

The Site collects effluent from the starch refining process in the Internal Drainage and Effluent storage tank.

The Internal Drainage and Effluent Storage Tank acts as a holding tank for process water. The process water is dosed with a polymer prior, allowed to settle and settled starch is returned to the process. The excess process water is discharged to sewer in accordance with the Trade Effluent Consent. This effluent water is monitored weekly by Welsh Water for suspended solids and pH, in accordance with the Trade Effluent Consent.

The effluent water is technically a wastewater. The table of wastes produced on Site has been updated to include this wastewater. However, as it has not ever been tankered off-site, it has not been attributed a waste code.

The Internal Drainage and Effluent storage tank is located on bunded tray.

Waste produced	Waste code	Quantities	Storage arrangements	Recovery / disposal
Packaging (card, plastic, pallet)	15 01 01 15 01 02 15 01 03	X2 1,100 l bins per waste stream weekly. c. 200 pallets weekly	1,100 l bins, stored separately under cover.	Recovered
Baled tonne bags (plastic)	15 01 02	7.5t / month	Bales	Recovered
Sodium monochloroacetate (SMCA)] (off-specification)	20 01 14*	c. x 6 IBC / year	1000kg IBCs on bunded spill trays, within a building	Disposal
Mergal (Bactericide/fungicide)	20 01 19*	c. x 6 IBC / year	1000kg IBCs on bunded spill trays,	Disposal



Waste produced	Waste code	Quantities	Storage arrangements	Recovery / disposal
			within a building	
Mixed general waste	20 03 01	X2 1,100 l X1 40 yard RORO skip Per week	40 yard RORO 1,100l bin	Disposal
Oil waste	13 02 06	c. x4 IBC / year	1,000 kg IBC on bunded spill trays within a building	Recovered
Waste starch	02 03 01	16 t / week	1,000 kg bags	Recovered
Oily rags	15 02 02	Once per month	Oil storage barrels	Disposal
Metal	17 04 02 17 04 05 17 04 07	Monthly	40 yard RORO skip	Recovered
Site effluent water (from starch refining process)	-	360m³ / 24hr Per discharge consent	1,000l IBC on bunded spill tray, north of building.	Recovered

Site Plan - CE-WH-1801-DW03 Rev A

Please update and resubmit this document. All emissions points must be shown on the plan and it must also identify all of the land on which your activities will take place. If the penstock valves are located within the site boundary then the site plan should clearly show this. This plan will be inserted into Schedule 7 of the permit.

The Site Plan has been updated (see CE-WH-1801-DW03 Rev B) to show all emission points included within the application. Emission point A1 was previously associated with a Heat Exchanger and Dust Extractor. It should be associated with a Heat Exchanger and Flash Dryer. This has been updated on the Emissions Plan.

The Emissions Plan shows all of the emission points associated with the installation (permit boundary – green line). Discharge points to surface water involve the discharge of clean water from site surfaces and does not include effluent from the installation. The Surface water discharge points SW1 and SW2 denote the points at which the clean surface water from the site, are discharged to the nearby brook. Should any monitoring be required, they may be monitored from the access point between the discharge and the penstock valves on each line. The permit boundary has been reduced very marginally from the northern boundary – essentially the activities are contained within the building, save for the Effluent Storage tank, which is located along the Site’s northern boundary. The updated drawings reflect this minor change (Drainage plan, Emissions Plan and Permit Boundary Plan).

Further to discussions held w/c 16/06/2025, there are some identified emission points which we consider will need including within the permit/ application to authorise the Site fully, namely:

- 5x refined starch drying units;
- 3x horizontal reactor vessels;
- 2x dust extraction systems; and
- 2x new boilers (to be installed in 2025, to replace the 2x existing boilers).



I trust the above address the queries raised. I will be happy to discuss any of the above points, should they require clarification.

Kind regards,

Kate Brady

Principal Consultant

Enclosed:

- Annex A 318659 Duynie Ingredients - LVOC BAT Assessment (1.0)
- Annex B CE-WH-1801-RP01-IPC-V3-FINAL In-Process Control document
- Annex C Drainage Plan CE-WH-1801-DW02 Rev C
- Annex D Emission Plan CE-WH-1801-DW03 Rev B
- Annex E Permit boundary plan