

## Compliance Assessment Report CAR\_NRW0050962

**Permit being assessed:** BU2349IL.  
**For:** Alyn Works, **held by:** Synthite Limited  
**At:** Denbigh Road, Mold, Flintshire, CH7 1BT.

**Type of assessment:** Report/Data Review,  
**Reason:** Routine.  
**On:** 19/01/2026.  
**Parts of permit assessed:** 3.1.2, 1.1.1(a).

**NRW Lead Officer:** Philip Harper.  
**Report sent to:** Technical Manager, Technical Manager, on 17/03/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR1A - Installations - Management - General Management	C2 Significant	1.1.1(a)

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

Total non-compliances recorded	Total non-compliance score
3	39

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
IR3A(2)	See actions in main text	31/03/2026
IR3A(2)	See actions in main text.	31/03/2026
IR1A	See actions in main text	31/03/2026

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

This compliance assessment report follows the receipt of additional monitoring data for the A16 boiler at Alyn Works, Synthite. This monitoring was requested following unpermitted rerouting of emissions from the A15 tanker loading scrubber to the A16 boiler in an attempt to improve emissions from the site. NRW first witnessed that this modification had been made during a site inspection on the 26<sup>th</sup> November 2025. This inspection is discussed in compliance assessment CAR\_NRW0050108.

Monitoring for formaldehyde, TVOC and Oxides of nitrogen (as NO<sub>2</sub>) at emission point A16 was undertaken on the 19<sup>th</sup> January 2026. With the following test results, formaldehyde 96.2 mg/m<sup>3</sup> compared to the permitted limit value 5 mg/m<sup>3</sup>, TVOC 100 mg/m<sup>3</sup> compared to the permitted emission limit value of 40 mg/m<sup>3</sup> and Oxides of Nitrogen as NO<sub>2</sub> 2.4 mg/m<sup>3</sup> compared to the permitted limit of 50 mg/m<sup>3</sup>.

A **category 3 score** has been applied against permit condition 3.1.2 in relation to the ELV exceedance for formaldehyde at emission point A16 under subheading IR3A(2) Emissions to air.

A **category 3 score** has been applied against permit condition 3.1.2 in relation to the ELV exceedance for TVOC at emission point A16 under subheading IR3A(2) Emissions to air.

Monitoring at the emission point follows a 6 monthly test schedule. Results for testing at the A16 boiler since the adoption of BAT testing methods is shown in the table below.

A16	17/02/23	08/03/23	03/08/23	24/04/24	19/11/24	17/01/25	10/07/25	19/01/26
Formaldehyde (mg/m <sup>3</sup> )	99.9	14.7	191	71.7	68	13.9	170	96.2
TVOC (mg/m <sup>3</sup> )	64.5	-	179	31.8	72.4	70.4	117	100
NO <sub>2</sub> (mg/m <sup>3</sup> )	6.3	-	5.7	4.9	5.4	6.9	5.3	2.4

The data shows that permitted emissions level breaches have occurred for formaldehyde and TVOC since January 2023. The observed formaldehyde emissions limit values have consistently exceeded the permitted limits.

These emission values have been observed over a time period of approximately 3 years without resolution, or a clear plan by the operator to improve emissions at A16. Natural Resources Wales considers this as a failure by the operator to manage the site in accordance with its environmental permit.

A **category 2 score** has been applied under subheading IR1A- Management.

**Action 1:** Submit all test house reports for the A16 boiler emissions since January 2023 by the **31<sup>st</sup> March 2026**.

**Action 2:** Provide a process description and operating parameters for the A16 boiler by the **31<sup>st</sup> March 2026**.

**Action 3:** State whether the MCERTS-accredited stack testing contractor can safely and practicably undertake monitoring of gas concentrations the A16 boiler, and provide details of the appropriate sampling point(s) where this monitoring would be carried out by the **31<sup>st</sup> March 2026**.

**Action 4:** Emission Point A16 – undertake monthly emissions monitoring, for an initial 3-month period (**March – May 2026**), for the following parameters, utilising monitoring methods and reference periods as described in Schedule 3, Table S3.1 of the permit.

-Formaldehyde

-TVOC

-Oxides of nitrogen (NO<sub>2</sub> expressed as NO<sub>2</sub>)

Emissions monitoring data (MCERTs Test Report) shall be submitted to NRW immediately upon receipt.

**Action 5:** Emission point A16 - undertake monthly carbon monoxide emissions monitoring, to coincide with the monitoring parameters specified within **action 4** this is to allow for combustion conditions within the A16 boiler to be assessed. Emissions monitoring data (MCERTs Test Report) shall be submitted to NRW immediately upon receipt.

**Action 6:** Conduct an investigation to identify the root cause(s) of the A16 boiler emission limit value (ELV) exceedances for formaldehyde & TVOC for samples since January 2023 and determine corrective and preventive actions to ensure compliance with the permitted emission limit value. Submit a report of the investigation findings, corrective and preventative actions proposed, with associated timescales for completion by the **31<sup>st</sup> May 2026**.

Kind Regards

**Phil Harper**

**Lead Specialist - Industry & Waste Regulation NE**

**03000 65 3717/ 07890025506**

**[philip.harper@cyfoethnaturiolcymru.gov.uk](mailto: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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

### Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

### Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk)

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** [ask@ombudsman.wales](mailto: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.