

Compliance Assessment Report CAR_NRW0052608

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: 06/08/2026.

Parts of permit assessed: See below.

NRW Lead Officer: Ricky Hartleb.

Report sent to: Site Manager, Site Manager, on 07/08/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR4C - Installations - Information - Notification	C3 Minor	4.3.1
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
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR1A - Installations - Management - General Management	C3 Minor	1.1.1

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

Total non-compliances recorded	Total non-compliance score
7	28

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(1)	See action 1	30/09/2026
IR3A(1)	See action 2	30/09/2026
IR4C	See action 3	30/09/2026
IR3A(2)	See action 4	01/05/2027
IR3A(2)	See action 4	01/05/2027
IR3A(2)	See action 5	01/05/2027
IR1A	See action 6	01/05/2027

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Quarterly Monitoring Results Q2 (April - June 2026), due 31 July 2026

Quarter 2 monitoring data for Synthite Limited, Mold Chemicals (Alyn Works), Denbigh Road, Mold, Flintshire, CH7 1BT was submitted to Natural Resources Wales in accordance with permit condition 4.2.3.

Emissions to Water W1

Monitoring for water emissions has been undertaken in accordance with the environmental permit. The following permit limit exceedances have been identified.

- Monitoring for Biological Oxygen Demand (BOD) was undertaken on 03 June 2026 which recorded a result of 35.1 mg/l, exceeding the permitted limit of 10 mg/l.
- Monitoring for Total Suspended Solids (TSS) was undertaken on 25 June 2026 which recorded a result of 23 mg/l, against a permitted limit of 20 mg/l. The reported result has an uncertainty factor of 20%, so when this is taken into account the result is not considered to be a confirmed exceedance.

No further permit limit exceedances were identified at emission point W1.

A Category 3 score has been applied against permit condition 3.1.2 (IR3A(1)) Emissions to water for the BOD exceedance.

Action 1: Investigate the cause of the BOD exceedance and provide NRW with a summary of the findings together with details of any corrective actions implemented by 30 September 2026.

Emissions to Sewer S1

Monitoring for emissions to sewer at S1 identified a permit exceedance for Total Ammonia (as nitrogen).

Monitoring undertaken on 27 May 2026 recorded a result of 162.2 mg/l, exceeding the permitted limit of 50 mg/l.

A Schedule 5 notification was submitted by the Operator on 27 July 2026. The notification states that routine monitoring undertaken on 26 May 2026 identified an ammonia result of 55 mg/l, exceeding the permitted limit of 50 mg/l. A repeat sample taken on 27 May 2026 identified an ammonia result of 162.2 mg/l against a permitted limit of 50 mg/l.

As detailed in compliance assessment report CAR_NRW0052422, work is currently underway to identify and implement improvements to the effluent treatment plant.

A Category 3 score has been applied against permit condition 3.1.2 (IR3A(1)) Emissions to water.

Action 2: Provide NRW with a copy of the completed investigation report together with confirmation that the corrective and preventative actions identified have been implemented by 30 September 2026.

Notification Requirements

Permit condition 4.3.1 requires NRW to be informed within 24 hours of detection of a permit breach. The Schedule 5 notification states that the exceedance was identified and reported retrospectively during preparation of the quarterly environmental return.

The ammonia exceedances occurred on 26 and 27 May 2026 and the Schedule 5 was not submitted to NRW until 27 July 2026.

A Category 3 score has been applied against permit condition 4.3.1 (IR4C) Notification.

Action 3: Review site procedures associated with permit breach notification and ensure all future breaches are reported in accordance with permit requirements by 30 September 2026.

Emissions to Air

Emission Points A1, A7, A8, A12 and A18

Monitoring for these emission points was undertaken during the reporting period. Apart from the

breaches detailed below, all reported results complied with the relevant permit emission limits.

Emission Point A16 - Combustion of Silver Process Exit Gas

Monitoring undertaken on 23 April 2026 and 27 May 2026 at A16 identified the following exceedances:

- Formaldehyde: 172 mg/m³ against a permitted limit of 5 mg/m³.
- TVOC: 97.2 mg/m³ against a permitted limit of 40 mg/m³.

The reported formaldehyde concentration significantly exceeds the permitted emission limit and indicates a significant failure of emission control or process operation. NRW considers this exceedance to be substantially greater than those identified during previous quarterly reporting periods.

A Category 3 score has been applied against permit condition 3.1.2 (IR3A(2)) Emissions to air for the Formaldehyde exceedance.

A Category 3 score has been applied against permit condition 3.1.2 (IR3A(2)) Emissions to air for the TVOC exceedance.

Action 4: The Operator currently has a Regulation 36 notice in place for improvement to be made at the A16 emission point by 01 May 2027. Until the improvement works has completed, it is expected that further breaches may occur, however the Operator should continue to monitor and report to NRW as per permit requirements.

Emission Point A17 - Three Natural Gas Fired Boilers

Monitoring undertaken on 27 May 2026 at A17 recorded a result of 184 mg/m³ NO_x against a permitted limit of 150 mg/m³.

A Category 3 score has been applied against permit condition 3.1.2 (IR3A(2)) Emissions to air.

Action 5: The Operator currently has a Regulation 36 notice in place for improvement to be made at the A17 emission point by 01 May 2027. Until the improvement works has completed, it is expected that further breaches may occur, however the Operator should continue to monitor and report to NRW as per permit requirements.

Emission Points A10, A11 and A15

No monitoring results were reported for emission points A10, A11 and A15 during the reporting period.

NRW notes that the previous compliance assessment report CAR_NRW0050605 confirmed that A10 and A11 are associated with the paraformaldehyde grinding process and are no longer operated.

A15 has been physically removed from site as discussed within compliance assessment report CAR_NRW0050108.

Management System

Compliance assessment report CAR_NRW0050605 identified that continued emissions limit breaches indicated that the environmental management system is inadequate and recorded a Category 3 non-compliance against permit condition 1.1.1a.

This quarter NRW has identified:

- Multiple air emission limit exceedances at A16 and A17.
- Permit limit exceedances at W1 and S1.
- Failure to implement the Operator's own operational response following identification of an ammonia exceedance.
- A delay of submitting the Schedule 5 notification to NRW.
- Continued permit non-compliance following the management system concerns raised within CAR_NRW0050605.

The issues identified during this reporting period indicates that improvements are required to ensure management systems and operational procedures are reviewed and followed. NRW considers that these findings demonstrate continued weaknesses in the management system which have contributed to permit non-compliances during this quarter, but recognises that improvements are being made.

A Category 3 score has been applied against permit condition 1.1.1a (IR1A) General Management.

Action 6: Continue to undertake emissions monitoring and investigate any trends.

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

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

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.