

Compliance Assessment Report CAR_NRW0052873

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: Other.

On: 04/09/2026.

Parts of permit assessed: See below.

NRW Lead Officer: Ricky Hartleb.

Report sent to: Site Manager, Site Manager, on 10/09/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

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.

At this time, we do not intend to take any further action.

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

This Compliance Assessment Report (CAR) is in response to Natural Resources Wales (NRW) reviewing the Cooling Tower Decommissioning Plan provided by Synthite Limited for the Alyn Works site, as per Action 2 of CAR CAR_NRW0052422.

This review has also considered correspondence relating to a reported odour complaint, incident number 2609045.

Odour Complaint

The Operator confirmed that it had carried out an internal investigation to identify the suspected root cause of the odour and advised that it would continue with measures intended to mitigate the suspected cause. However, the Operator considered that complete elimination of the odour was unlikely due to the nature of the water source or organic activity within the storage lagoons.

Based on the information provided, NRW is satisfied with the Operator's explanation and proposed actions. The information was recorded against the incident and is now considered resolved.

The Operator should continue to monitor the lagoons and maintain appropriate controls to minimise the risk of odour. Any recurrence of significant odour should be investigated and managed in accordance with the site's Environmental Management System (EMS).

Action 1: Review site procedures to ensure that appropriate odour controls are included and provide a copy to NRW by 30 September 2026.

Cooling Tower Decommissioning Plan

The Cooling Tower Decommissioning Plan was prepared by the Operator and is dated 20 August 2026. The plan relates to the permanent decommissioning and dismantling of the existing wooden cooling tower.

The existing concrete cold-water pond will be retained and reused as part of the replacement system. The replacement will comprise a Watermiser Model 48, four-cell glass reinforced plastic cooling tower and Dustacco Engineering Limited has been appointed to undertake the deconstruction and disposal works.

The plan states that the cooling tower and associated services will be isolated and drained. Water currently held within the cooling tower will be transferred to the site lagoons for treatment through the Effluent Treatment Plant (ETP). Any sludge or solids unsuitable for treatment will be assessed and managed separately.

Any waste generated from the construction works will be placed into designated skips.

The anticipated waste streams include:

- Treated timber
- Plastic components
- Metals
- Mechanical equipment
- Other demolition waste

The plan states that potentially contaminated waste will be assessed before disposal and that waste transfer documentation will be retained.

NRW has identified the following matters requiring further consideration:

- Before any waste is transferred off-site, provide NRW with the classification and proposed management route for the treated timber and any other potentially contaminated waste. This should include the relevant List of Waste (LoW) codes, hazardous or non-hazardous status, waste description and proposed receiving facility.
- Prior to disposal of any waste, the Operator should confirm that any contracted waste carriers are registered, and that the receiving facility is authorised to accept the relevant waste streams. Waste transfer notes and where applicable, hazardous waste consignment notes must be completed and retained.
- Prior to transferring any cooling water to the lagoons, confirm that the liquid is suitable for treatment and will not adversely affect lagoon capacity, ETP performance or compliance with the environmental permit. Records of this assessment should be retained.
- Ensure that the relevant risk assessments and method statements address the management of stagnant water, sludge, deposits and any associated microbiological risks during the draining, cleaning and dismantling of the cooling tower. In doing so, the Operator should consider the Health and Safety Executive (HSE) Bulletin SID 2-2012 - *Management of the risks from legionella in cooling towers and evaporative condensers* (<https://www.hse.gov.uk/safetybulletins/coolingtowers.htm>) together with the relevant current HSE guidance for evaporative cooling systems.

Action 2: Revise the plan to address the comments above and provide a copy to NRW by 30 September 2026.

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.