Notice of request for more information

Environmental Permitting (England and Wales) Regulations 2016

Notice requiring further information

To: Andrew Mason with cc to Jane Hall of Enzygo
C/O Thomas Dale, IQE Company Secretary
IQE (Europe) Ltd
Pascal Close
St Mellons
Cardiff
CF3 0LW

Application number: PAN-030753

Natural Resources Wales, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit, dated 30 September 2026. The information requested should be sent to the following address by 27 October 2026.

Information should be sent to:
Emily Lloyd
Permitting Centre
Welsh Government Offices
Cathays Park 2
King Edward VII Avenue
Cardiff
CF10 3NQ

Name	Date
Emily Lloyd	30/9/26

Authorised on behalf of Natural Resources Wales

Ffôn/Tel 0300 065 4411
Ebost/Email emily.lloyd@cyfoethnaturiolcymru.gov.uk
emily.lloyd@naturalresourceswales.gov.uk
Natural Resources Wales, Welsh Government Offices, Cathays Park, King Edward VII Avenue, Cardiff, CF10 3NQ
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www.naturalresourceswales.gov.uk Correspondence welcomed in Welsh and English

Schedule

1. **Aqueous Discharge**
    a. During the site visit on 21 September 2026 the use of the effluent treatment plant was discussed and verbally confirmed this is not present on site.
        i. **Confirm in writing that the effluent treatment plant listed as Directly Associated Activity A3 in the current permit (EPR/KP3235SS) is not present at the site.**

    b. Section 4.1.2 of IQE's application[1] states that there are discharges via sewer but subsequent correspondence via email received from Andrew Mason on 22 July 2026 indicate that although there is an authorisation in place with Welsh Water this is not utilised and there are no discharges to foul sewer (S1). Storage arrangements for aqueous waste generated through use of the wet scrubber were confirmed during a site visit on 21 September 2026.
        i. **Provide a CIRIA736 Assessment of the hazardous waste storage area where hazardous aqueous waste originating from the wet scrubber is stored.**

    c. During the site visit on 21 September 2026 and unknown level of liquid had accumulated in the sump at the rear of the hazardous waste area. The procedure for testing and removal or discharge of this liquid was unclear. This is needed to ensure appropriate operational processes are in place for hazardous waste storage generated from abatement of emissions to air.
        i. **Provide documented procedure for emptying liquid from the hazardous waste area sump.**

2. **Environmental Risk Assessment**
    a. The proposed substances (propane, ethylene, TBP, TBH, TBA and Germane) will be stored as gases in various locations, depending on the substance, per section 3.4 of IQE's Application[1]. Further information is needed to understand if the containment meets acceptable standards to minimise risk of release to the environment.
        i. **Confirm the title references of the standards or guidance that will be used for containment and segregation, of the proposed substances in each storage location for each gas included in IQE's Application[1].**
        ii. **If a substance is stored in an extracted area, such as a bunker, state where the extraction system discharges or captures emissions? If a process flow diagram exists provide that alongside the written description.**

3. **Accident Management Plan**
    a. During an emergency fire water would be used in the chemical storage area and/or hazardous waste storage area. The AMP states that drains are colour coded on site to allow for easy identification during an emergency, but no colour coding could be identified during the site visit on 21 September 2026. Provide a drainage plan to provide clarity on the risk to environmental receptors from firewater.
        i. **Provide a drainage plan for the site.**
    b. During the site visit it was understood that there was one available magnetic drain cover used during deliveries and clay drain cover material available from within the facility. We need to understand how spills are prevented from entering drains in the external areas of the site.
        i. **Provide a source-pathway-receptor overview of spills in the external storage areas, and clarity on how receptors would be protected in the case of a spill.**
        ii. **Provide a site-specific spill response plan or procedure.**

4. **Production Level**
    a. The level of production in each Fab is not known. This is needed for context of production levels in relation to raw materials and emission levels.
        i. **Provide quantification of production output from Fab1 and Fab 2, and the maximum quantity expected to be produced in Fab1 and Fab2. Quantify in most relevant unit (number, kg, square inches, or other unit).**

5. **BAT Assessment**

    The BAT Assessment, including the Best Available Techniques conclusions for Common Waste Gas Management and Treatment Systems in the Chemical Sector[2], and EPR 4.03 (additional requirements), provided in IQE's Application[1] makes several statements in the details column of the Tables 4 to 11. Further information is needed to evaluate conformance with BAT and the EPR 4.03.

    a. BAT 2 – The inventory of channelled and diffuse emission to air is to include simplified process flow sheets for emissions to air and water.
        i. **Provide the simplified process flow sheets referred to which show the origin of the emissions.**
    b. BAT 6 – Details noted include *PPM programme is currently in place, which will include new plant and equipment*.
        i. **Provide a description of the new plant and equipment.**
    c. BAT 7 – Continuous monitoring of waste gas flow and temperature of waste gas streams being sent to A1 and A3.

i. **Provide a description of how waste gas streams are monitored, including equipment and systems used, and the standards the equipment meets.**
ii. **Provide a description which links continuous waste gas stream monitoring with the process parameters of the abatement equipment on A1 and A3.**

d. BAT 16 – Abatement plant, where relevant to the variation application, must be proven effective in relation to the chemicals and emissions released during their use.
   i. **Provide evidence which indicates thermal abatement will result in >99% emissions abatement from A1 for propane and ethylene.**
   ii. **Provide further description of thermal abatement technology in place. For reference the WGC BAT conclusions section 1.4.1 describes the types of thermal oxidation which may be in use.**
e. BAT 16 - with reference to 1.4.1 Techniques to reduce channelled emissions to air.
   i. **Provide evidence of planned maintenance schedule.**
   ii. **Provide evidence that wet scrubber (absorption) will result in >99% emissions abatement from A3 for TBH, TBA and TBP.**

[1] IQE application document reference: CRM.598.004.PE.R.001.D
[2] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022D2427

End of Schedule.