

24<sup>th</sup> August 2016

Mr I Oakes  
Natural Resources Wales  
Chester Road  
Buckley  
Flintshire  
CH7 3AJ

Dear Mr Oakes

**PART B REPORT (SCHEDULE 1) – PPC PERMIT NUMBER BU 2357**

Please find enclosed the information provided as a Part B report for the following Part A notification:-

Part A ref. No. 19072016 - A

Yours sincerely  
FOR WARWICK CHEMICALS

MR PETER BRYANT  
HEALTH SAFETY & ENVIRONMENT MANAGER

<b>TITLE :</b>	Part 'B' Report Form		<b>ISSUE NO.</b>	15.0
<b>REF :</b>	RCF20	<b>AREA:</b>	SITE	<b>DATE OF ISSUE:</b> 08.05.13
<b>RELATED DOCUMENT:</b>	WI 903 App C		<b>PAGE:</b>	2 of 2
<b>FILENAME:</b>	Part B Form 19072016 - B	Last printed 25/08/2016 12:35:00		Created on 04/08/2016 07:54:00



Part B Notification (schedule 1) in accordance with condition 5 (5.1.1 and 5.1.2) of PPC Permit BU 2357.

## **REFERENCES**

Part A form, Ref. N°. 19072016 - A submitted to the Environment Agency on 7<sup>th</sup> August 2016.

## **Further, more accurate information on the matters for notification under Part A.**

Quarter 3 monitoring had been scheduled for the week commencing the 18<sup>th</sup> July 2016. Plant 6, emission point A3 was being monitored on the 19<sup>th</sup> July as part of this process. The sampling schedule coincided with the QC analysts holiday so the samples stored in the fridge and were not analysed until the week commencing the 1<sup>st</sup> August 2016. The sampling was carried out over a five hour period. When removed the sample tube used for Plant 6 showed some carry through to the back part of the tube, but was still acceptable as a representative sample.

Results from the analysis of Plant 6 were above the 100mg/m<sup>3</sup> level, the consent limit for this emission point being 50 mg/m<sup>3</sup>.

Investigation into the reason for the high emissions during this period have identified that the levels in the intermediate tanks that supply Plant 6 were higher than usual. A high temperature in one of the intermediate tanks feeding Plant 6 had caused the feeding of material from the filter dryer plant to stop effectively bringing the manufacturing operation to a standstill. A charge of acetic anhydride had to be added to this storage tank to reduce the temperature to allow the filter dryer plant to start-up again. It is thought that the charging of this material will have pushed the acetic acid/acetic anhydride vapour out from the head space in the tank and caused the overloading of the scrubber at that time.

There was no discernible smells of acetic acid/anhydride reported outside the Plant during the day. The ambient temperature during the day was around 26°C.

## **Measures taken (or intended to be taken) to prevent a recurrence of the incident.**

The operating levels in the intermediate tanks had been run to a higher level than usual owing to some operational difficulties in Plant 6. This had been due to vessel availability in the Plant as a result of maintenance requirements. This issue has now been resolved.

A full clean out of the scrubber system has been scheduled to be carried out during the September 2016 site shutdown. In the future the full operation of the AED recycle plant will allow for the closure of Plant 6 and therefore this type of situation will not reoccur.

Re-sampling has been carried out to identify that the Plant operations are back under control.

## **Measures taken (or intended to be taken) to rectify, limit or prevent any pollution of the environment or harm which has been or may be caused by the emission.**

It is thought that no measurable environmental damage has occurred as a result of this incident. Repeat scrubber monitoring will be undertaken to ensure that the system is operating correctly.

## **Dates of unauthorised emissions from the installation in the previous 24 months.**

19/06/2014, 20/07/2014, 21/07/2014, 22/07/2014, 19/08/2014, 07/09/2104, 15/09/2014, 02/03/2016, 12/03/2016, 23/04/2016, 26/04/2016.