

12th April 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. 02/03/2016-A

Yours sincerely
FOR WARWICK CHEMICALS

MR PETER BRYANT
HEALTH SAFETY & ENVIRONMENT MANAGER

TITLE :	Part 'B' Report Form			ISSUE NO.	15.0
REF :	RCF20	AREA:	SITE	DATE OF ISSUE:	08.05.13
RELATED DOCUMENT:	WI 903 App C			PAGE:	2 of 2
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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°. 02/03/2016-A submitted to the Environment Agency on 02/03/2016.

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

Acetic acid is produced on site from the separation of the acetic acid/acetic anhydride mixture that is distilled off during the TAED manufacturing process. The distillation unit pumps the acetic acid from the receiving vessel on the distillation plant to storage tank T058 (outside Plant 5) or to storage tank T010 and T011 (located in Tank Farm 1). The distillation unit had been pumping acetic acid to the Tank Farm 1 storage tanks during the night, the acetic acid destination was changed just before shift hand over ~06.45hrs and was now going into tank T058. The tank at that time was showing a volume reading of some 38 tonne – the tank capacity is 59.6 tonne. One of the operations staff was carrying out the first round of plant checks at about 07.20hrs when he detected an acetic acid odour and saw that there was material coming down the North side of tank T058. He activated the site alarm and radioed the central control room to divert the acetic acid back to the Tank Farm 1 storage tanks. The emergency response team mustered and set up a curtain monitor on the side of the tank to knock down any airborne emissions. Examining the management system information graphs for the different acetic acid destinations it has been determined that the quantity lost from the tank was between 200 to 300 litres. Investigations into the incorrect volume reading for the tank has identified that one of the brass fittings for the nitrogen bubbler has cracked and this was allowing some of the nitrogen back pressure to leak out which resulted in a lower tank volume indication.

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

The brass connections on the nitrogen bubbler level indication system on this tank have been changed for 316 stainless steel units. A works order has been put on the Mainsaver Maintenance system (D194731) to inspect all fittings/connections on the Tankmaster level systems on each raw material and process intermediate tank. All of the fittings for any instrumentation equipment that is currently being installed on site has been specified to be stainless steel. The high level detection system for this tank has been reviewed and it now has additional interlocking with the bubbler system and the independent high level system to shut the inlet valve to the storage tank. A review is being carried out on the level control systems and system interlocks for other storage tanks on site.

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.

The material that was lost from the primary containment (tank T058) was captured in the secondary containment system – the plant 5 bund. The material collected in the bund had mixed with some residual rainwater from the previous night and could not be accurately measured. This was pumped out from the bund area and then automatically neutralised in the central collection chamber on site. The waste water tank that contained this material was discharged with all the determinants within the emission consent limits.

It is thought that no measurable environmental damage has occurred as a result of this incident.

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

26/02/2014, 19/06/2014, 20/07/2014, 21/07/2014, 22/07/2014, 19/08/2014, 07/09/2104, 15/09/2014.