



TS RESINS LIMITED

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Your Ref: BU2322
Our ref: EPR returns 2013
Date: 28th January 2014

Dear Mr Zachary,

I enclose reports for sections 4.1.4 (fugitive emissions) and 4.1.5 (targets and achievements) of our EPR permit.

An audit of our site SPMP was carried out during the year. The audit showed that no changes were required to the SPMP or the programme of sampling. The company carrying out the MCERTS accredited atmospheric monitoring was audited during the year.

- Physical inspection of tanks and pipelines containing hazardous substances took place in 2013. It is expected to continue with low hazard tanks during 2014.
- Energy reduction programmes are continuing, with lighting being addressed during 2013.
- Work has been carried out on the sale of the company and the resultant changes as a result of a new owner and a change in the structure of the owning company. This is expected to continue during 2014.

A programme will be developed for 2014 as part of the annual review of HSE targets.

Yours sincerely,

Greg Hickman



Condition 4.1.4 Fugitive Emissions

Target	Actual	Comments
Zero emissions from the urea silo (filter unit F516 is a licensed emissions point).	Met.	No visible emissions from the filter unit.
Zero emissions from pumps, valve and flanges to the environment.	Met.	No visible emissions from valves or flanges. Minor emissions of resin from packed gland pumps. Leaks were into bunded areas at ambient temperature and were cleaned up as part of normal operating practices.
Zero spills from resin storage tanks to uncontained areas.	Met.	No spills from storage tanks to uncontained areas.
Zero spills from resin storage to contained areas	Met.	No spills within containment (minor spills from sampling, filter cleaning and routine maintenance).
Zero spills from AdBlue storage to uncontained areas.	Met.	All AdBlue storage is within bunded plant or bunded tank farm. There were no leaks out of contained areas.
Zero spills from AdBlue storage to contained areas.	Met.	No significant spills within containment. Minor spills from sampling, filter cleaning and routine maintenance. Where possible, AdBlue liquors are recycled within the process. AdBlue does not contain any of the permitted organic species and has no VOC emissions.
Zero emissions from AdBlue storage tanks.	Met.	AdBlue does not contain any of the permitted organic species and has no VOC emissions.
Zero emissions from raw material storage tanks.	Met.	T431 phenol storage tank vents to the abatement plant. All other raw material tanks do not contain organic substances.
Minimal emissions from resin storage tanks.	See comments.	Exports to resin storage tanks leads to a displacement of air from the ullage of the tank. Tank farm ullage space sampling was carried out during 2011. Current PF resins do not contain free phenol. Tank emissions are included in the site pollution inventory return. The PF tank farm is not currently in use for the storage of resins.
Zero emissions from reactors and associated plant.	Met.	All reactors vent to the abatement plant. There were no problems during the year that led to a reactor being vented directly to atmosphere without prior treatment.

Condition 4.1.5 Targets and Achievements

Target	Actual	Comments
Maintain ISO 14001 accreditation.	Accreditation maintained.	No non-conformances.
Maintain ISO 9001 accreditation.	Accreditation maintained.	No non-conformances.
Maintain OHSAS 18001 accreditation.	Accreditation maintained.	No non-conformances.
Submit EPR returns by the 31 st January 2013.	Submitted on time.	
Submit PI returns by the 28 th February 2013.	Submitted on time.	
Submit CIA Indicators of Performance by the 22 nd March 2013.	See comments.	Dynea withdrew from the CIA during the year. 2013 and future submissions are not required.
CIA climate change levy return under CIABATA for compliance with CCL agreement.	Met.	Submit information to the Chemical Industries Association as requested to allow negotiations with DEFRA and follow up with specific site data for new CCL agreement.
SPMP audit and review.	Met.	No significant findings from the audit.
Stack emissions monitoring by the end of May 2013.	Monitoring carried out.	Results submitted to the EA. All species within licence limits.
Audit of stack emissions monitoring company May 2013.	Met	Audit company against MCERTS requirements.
Continue 'in house' stack emissions monitoring.	Met. Ongoing.	Technique not MCERTS but used for internal monitoring only. All results within species limits.
Increase number of 'bug counts' on the cooling towers.	Met.	General and legionella specific tests are carried out by the contract company monitoring the two cooling towers. Routine tests are carried out by the QC dept. Average of 10 tests per month.
Continue with monthly environmental plant checks carried out by the operators.	Met.	Currently 2 per month.
Carry out two borehole sampling cycles on the three boreholes in TS Resins controlled areas.	Met.	Two cycles of borehole monitoring carried out. Results were in line with previous data and indicate no significant problems.

Target	Actual	Comments
Submit EP OPRA scoring as requested.	Done.	
Respond to EA requests as they arise.	Done.	OMA audit carried out by the site Inspector.
70% waste recycling internally.	Not met.	During 2013 the internal waste recycling rate was 31.5%.
Greater than 90% waste recycling or recovery (internal and external).	Met.	Overall recycling rate of 92.1%.
75 kWh energy per tonne of product.	Not met.	Actual of 137 kWh (including office, personal transport and site transport). Energy use is highly dependent on product mix.
100% distillate recycling.	Met.	Low generation of distillate over the year due to a change in product mix.
100% liquid resin recycling.	Not met.	Some UF resin was sent off-site.
12 housekeeping audits.	Met.	
12 environmental safety walks.	Met.	
No accidental releases greater than 300kg (threshold for reporting to head office).	Met.	
Investigate the sourcing of a waste compactor.	Not met.	Ongoing action.
Install variable speed drives on all cooling tower drives to reduce energy and water use.	Not met.	VSDs installed on one tower (Tower 7). Replacement pumps ordered for Tower 7 (due early 2014). Tower 9 will be addressed once Tower 7 work is completed.
Carry out Domino meetings with Synthite as required.	Met.	
Carry out emergency training.	Met.	Chemical decontamination, hazard symbols, AED, and communications training carried out. Ongoing liaison with Flintshire County Council regarding the off-site plan.
Liaise with Synthite over changes to company structure.	Met.	Liaise with Synthite over the changeover from Dynea to TS Resins and any associated changes as a result of the change in corporate structure.
Carry out inspection of AdBlue ISO tank storage.	Met.	The ISO tanks are leased from Huktra, who carry out inspections on the tanks (in line with the ADR requirements for road haulage). No problems.
Submit hazardous waste registration if needed.	Met.	Hazardous waste registration required and made in June 2013.