



TS RESINS LIMITED

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Mr A Zachary
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Your Ref: EPR/UP3831ES
Our ref: EPR returns 2017
Date: 31st January 2018

Dear Mr Zachary,

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

Common site borehole monitoring is being carried out across the site. Results to date are in line with historical data. The site has been in contact with NRW to assist them with tracking ammonia levels in the river Alyn during spring and summer.

There is a common site contact for the Health and Safety Executive and Natural Resources Wales. Mr Matt Lea is the Site Manager for the Competent Authority. Both companies have Mr Zachary as site PPC Inspector and Mr Oakes as COMAH Inspector.

Opportunities are currently being investigated to handle intermediate streams from Synthite Ltd, TS Resins Ltd and BIP Ltd (a sister company in Oldbury, West Midlands) and reduce waste as well as improve raw material balances. This is a long term project and is running in conjunction with a programme to optimise production (AdBlue production moved to Oldbury several years ago and a project is underway to moved butylated resins from Oldbury to Mold).

A programme will be developed for 2018 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, valves and flanges to the environment.	Met.	No visible emissions from valves or flanges. Minor emissions of resin from packed gland pumps. Leaks were into banded 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 to uncontained areas.
Zero spills from resin storage to contained areas	Met.	No spills within containment (minor controlled spills from sampling, filter cleaning and routine maintenance).
Zero spills from AdBlue storage to uncontained areas.	N/A	To be removed for the 2018 submission.
Zero spills from AdBlue storage to contained areas.	N/A	To be removed for the 2018 submission.
Zero emissions from AdBlue storage tanks.	N/A	To be removed for the 2018 submission.
Zero emissions from raw material storage tanks.	Not met.	T431 phenol storage tank vents to the abatement plant. Minor leak from a caustic storage tank into a bund due to a leak on a valve. 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. PF resins are exported direct to tankers and do not contain free phenol. Tank emissions are included in the site PRTR returns. 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. Emissions were below the permitted values (see EPR returns form A1).

Condition 4.1.5 Targets and Achievements

Target	Actual	Comments
Maintain ISO 14001 accreditation.	Accreditation maintained.	Accredited to ISO 14001:2015. No non-conformances.
Maintain ISO 9001 accreditation.	Accreditation maintained.	Accredited to ISO 9001:2015. Two minor non-conformances.
Maintain OHSAS 18001 accreditation.	Accreditation maintained.	No non-conformances. Working towards ISO 45000 accreditation once the standard is published
Submit EPR returns by the 31 st January 2017.	Submitted on time.	
Submit PRTR returns by the 31 st March 2017.	Submitted on time.	
CIA climate change levy return under CIABATA for compliance with CCL agreement.	Met.	TP2 returns for the 2015/2016 period submitted on time. Target not met and carbon credits bought to maintain compliance.
Stack emissions monitoring by the end of May 2017.	Monitoring carried out.	All permitted species within licence limits.
Continue 'in house' stack emissions monitoring.	Met. Ongoing.	
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.	
Carry out two borehole sampling cycles.	Met.	Common site SPMP programme with two sets of sampling carried out annually.
Submit EP OPRA scoring as requested.	Met.	
Respond to NRW requests as they arise.	Met.	

Target	Actual	Comments
70% waste recycling internally.	Not met.	During 2017 the internal waste recycling rate was 65%.
Greater than 90% waste recycling or recovery (internal and external).	Met.	Overall recycling rate of 95%.
75 kWh energy per tonne of product.	Not met.	Actual of 190 kWh (including office, personal transport and site transport). Energy use is highly dependent on product mix.
100% distillate recycling.	Met.	
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.	Met.	
Install variable speed drives on all cooling tower drives to reduce energy and water use.	Not met.	Tower 7 operates with automatic fan operation and semi-automatic pump operation. Tower 9 to be completed once Tower 7 is fully automatic.
Carry out Domino meetings with Synthite as required.	Met.	Domino meetings are no longer required as there is a common site HSE structure – staff attend safety meetings for both companies and there is close co-operation for all safety and Major Accident Hazard requirements.
Carry out emergency training.	Met.	Internal emergency plan introduced with similar format to external plan. Initial work on the external plan exercise (due mid 2018). Office evacuations carried out during the year.
Submit hazardous waste registration if needed.	Met.	Hazardous waste registration required and made in September 2017.