



TS RESINS LIMITED

ALYN WORKS, DENBIGH ROAD, MOLD,
FLINTSHIRE, UNITED KINGDOM CH7 1BF

A Member of the Tennant Group (Est. 1797)

Registered Office No: 8263403

Telephone: 01352 757657

Fax: 01352 758914

Mr A Zachary
Environment Agency Wales
Chester Road
Buckley
Flintshire
CH7 3AJ



Greg Hickman, Health, Safety and Environment Officer

Tel: 01352 707623

Fax: 01352 758914

Email: greg.hickman@tsresins.co.uk

Your Ref: EPR/UP3831ES
Our ref: EPR returns 2014
Date: 23rd 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.

A review of our SPMP was carried out during the year. As TS Resins and Synthite are owned by the same parent company, it has been decided going forward that independent borehole monitoring by TS Resins is no longer necessary as TS Resins has full access to all site data.

Towards the end of 2014, the Technical and HSE Manager for Synthite Ltd retired. As part of restructuring, G Hickman took on site responsibility for HSE, reporting through Dr P de Wolf.

- The energy reduction programme has continued with new pumps and VSDs being fitted to the UF plant cooling tower (tower 7).
- TS Resins applied for an EPR licence as part of the changeover.
- A COMAH notification was made to the Health and Safety Executive regarding the company change.
- The on-site effluent treatment plant has started to take some TS Resins waste streams previously sent off-site. This has improved the on-site waste recycling balance significantly.

A programme will be developed for 2015 as part of the annual review of HSE targets.

Yours sincerely,

Greg Hickman

ENCLOSING RETURNS N. WALES

CHECKED vs AUTHORIZATION

RACKING

OK FOR FUEL REGISTER

INITIALS DATE

AE 20/5/15

JB 28-1-15

AE 20/5/15



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.	AdBlue production was transferred to our sister site (BIP in Oldbury). No production in 2014 although the manufacturing facility remains (mothballed).
Zero spills from AdBlue storage to contained areas.	Met.	See above.
Zero emissions from AdBlue storage tanks.	Met.	See above.
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. Emissions were below the permitted values.

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 2014.	Submitted on time.	
Submit PI returns by the 28 th February 2014.	Submitted on time.	
CIA climate change levy return under CIABATA for compliance with CCL agreement.	Met.	A successful request was submitted to join the scheme as TS Resins. A 'dry run' exercise is planned for January 2015.
Stack emissions monitoring by the end of May 2014.	Monitoring carried out.	Results submitted to the EA. All species within licence limits.
Continue 'in house' stack emissions monitoring.	Met. Ongoing.	Technique not MCERTS but used for internal monitoring only. All results within species limits. The technique is to be reviewed during 2015 as we move to a different test method.
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.	Not met	One cycle carried out – results were in line with historical data. In future, results from Synthite monitoring are available for TS Resins as they are now sister companies with the same parent.
Submit EP OPRA scoring as requested.	Done.	
Respond to NRW requests as they arise.	Done.	

Target	Actual	Comments
70% waste recycling internally.	Not met.	During 2014 the internal waste recycling rate was 68.8%.
Greater than 90% waste recycling or recovery (internal and external).	Not met.	Overall recycling rate of 86.3%.
75 kWh energy per tonne of product.	Not met.	Actual of 214 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.	Not met.	11 audits carried out.
12 environmental safety walks.	Met.	
No accidental releases greater than 300kg.	Met.	
Investigate the sourcing of a waste compactor.	Met.	TS Resins have access to the compactor used by the Chemicals plant (Synthite operation).
Install variable speed drives on all cooling tower drives to reduce energy and water use.	Not met.	New pumps and VSDs fitted to tower 7. Initial work carried out on computer operation. Tower 7 now operates with manual / automatic speed control. Tower 9 to be completed once Tower 7 is fully automatic.
Carry out Domino meetings with Synthite as required.	Met.	
Carry out emergency training.	Met.	Liaison with Flintshire County Council regarding changes to the emergency planning team and proposed changes to 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 have been removed.
Submit hazardous waste registration if needed.	Met.	Hazardous waste registration required and made in August 2014.