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Your Ref: EPR/UP3831ES
Our ref: EPR returns 2015
Date: 26th January 2016

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. A common site SPMP has been created. Borehole monitoring will be carried out on a six monthly basis with the samples being analysed for formaldehyde, methanol, phenol and total nitrogen. A full suite of analysis will be carried out every four years (to align with the four yearly review of the SPMP). Should the six monthly analysis indicate a problem, an investigation will be carried out (which may involve more extensive sampling and analysis).

There is a common site management structure for Health, Safety and Environment. Company specific HSE meetings are carried out, but guests are invited from the other company and minutes are freely distributed. There is a common site contact for the Health and Safety Executive and Natural Resources Wales. Mr Matt Lea has taken responsibility for TS Resins, leading to the same inspectors for both companies.

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 expected to be a long term project.

A programme will be developed for 2016 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.	Not met.	One spill during the loading of a tanker (bottom outlet valve left open by inexperienced driver). No release to drains or lagoons. Spill contained and cleaned up by site personnel.
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.	N/A	AdBlue production was transferred to our sister site (BIP in Oldbury). No production in 2015 although the manufacturing facility remains (mothballed).
Zero spills from AdBlue storage to contained areas.	N/A	See above.
Zero emissions from AdBlue storage tanks.	N/A	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 2015.	Submitted on time.	
Submit PI returns by the 28 th February 2015.	Submitted on time.	
CIA climate change levy return under CIABATA for compliance with CCL agreement.	Met.	Return made in 2015. TS Resins did not meet their energy target and carbon credits were purchased to cover the shortfall.
Stack emissions monitoring by the end of May 2015.	Monitoring carried out.	Results submitted to NRW. All species within licence limits.
Continue 'in house' stack emissions monitoring.	Met. Ongoing.	General stack emissions monitoring was reviewed during 2015 and changes have been made to internal monitoring.
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.	Common site SPMP programme with two sets of sampling carried out annually.
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 2015 the internal waste recycling rate was 50.9%.
Greater than 90% waste recycling or recovery (internal and external).	Not met.	Overall recycling rate of 84.3%.
75 kWh energy per tonne of product.	Not met.	Actual of 210 kWh (including office, personal transport and site transport). Energy use is highly dependent on product mix.
100% distillate recycling.	Not met.	Some distillate sent off-site for disposal.
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.	One release during tanker loading but less than 300kg.
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.	Common site HSE structure.
Carry out emergency training.	Met.	Off-site exercise carried out in June. New format external plan implemented. Work started on a similar format on-site plan.
Submit hazardous waste registration if needed.	Met.	Hazardous waste registration required and made in August 2015.