



# SYNTHITE LIMITED

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

A Member of the Tennant Group (Est. 1797) Registered Office No: 164640  
Telephone: 01352 752521 Fax: 01352 700182

Ms Julie Bradford  
Environment Agency  
Chester Rd.  
Buckley  
Flintshire  
CH7 3AJ



Wednesday 28<sup>th</sup> Jan 2015

Dear Ms Bradford,

Re: IPPC Permit BU2349 – Sec 4.1.4 Fugitives Review.

Please find enclosed a summary review as required by the above clause

Yours Sincerely,

pp G. Hickman

Encs. Review

**MONITORING RETURNS N. WALES**

	INITIALS	DATE
CHECKED VIA AUTHORIZATION	AK	18/1/15
TACKLING	JB	30-1-15
OK FOR PUBLIC REGISTER	AK	18/1/15



For Formaldehyde,  
Paraformaldehyde,  
ALCOFORM<sup>®</sup> Solution  
Agricultural Products &  
Chemical Toll Manufacture



<b>Fugitive Emissions Documentation</b>		<b>Form No. : SYN SHE 72</b>	
Created By:	JTH	Date:	26/01/15
Approved By:	D M Jones	Page 1 of 37	
Version No:	11	Approval Date:	26/01/15

**Review Record:**

Date	Reviewer	Reason for Review	Amendments
Jan 2004	RM /J. Hallard / Syngensis	Initial assessment	--
Jan 2006	J. Hallard / K. Polden	Annual following submission of Improvement items 9 / 11 / 13 / 14	IP9) Sub surface tanks P1/2 in need of repair – to be actioned in 2006 . IP9)Sub surface tanks P5/6 in good condition. IP11)Storage areas (program of work to upgrade produced) IP13/14) Program of work produced for the year No new emissions identified
Jan 2007	K. Polden/ J. Hallard	Annual following submission of Improvement item16	IP16) Program of work produced Table 2.2.4.3 amended No new emissions identified
Jan 2008	K.Polden / D.M.Jones / J. Hallard	Annual as permit 4.14	No new emissions identified. Various changes following PC audit 2007 Updated work programs from previous years. Included report on subsurface tanks P1/2. Program for basic kerbing around DeAcid column to be completed 2008.
Feb 2009	K.Polden / D.M.Jones / J. Hallard	Annual as permit 4.14	Old T.O.Plant now removed; no potential from there now. Old T.O Plant bunded area used for storage to reduce impact of container fugitive spill by containment Reactor R6 to be included during 2009.

<b>Fugitive Emissions Documentation</b>		<b>Form No. : SYN SHE 72</b>	
Created By:	JTH	Date:	22/01/14
Approved By:	D M Jones	Page 2 of 37	
Version No:	10	Approval Date:	22/01/14

Date	Reviewer	Reason for Review	Amendments
Jan 2010	K.Polden / D.M.Jones / J. Hallard	Annual	<p>Added in KP updated Imp Item 13/14/15 .</p> <p>R6 now included in the permit.</p> <p>No problems with FE over the year and no new items to address.</p> <p>Construction of a kerb to the concrete by Dynea almost completed preventing overflow to unmade ground.</p>
JAN 2011	K.Polden / D.M.Jones / J. Hallard	Annual as permit 4.14	<p>No issues involving fugitives over 2010 + no new items to address.</p> <p>Construction of a kerb to the concrete by Dynea was completed and working correctly</p> <p>At end of 2010 there is currently an outline project to assess removing the underground tanks P1 and P2 and rebund overground in the old T.O Bund. – Discussions with EA to follow in 2011.</p>
JAN 2012	K.Polden / D.M.Jones / J. Hallard	Annual as permit 4.14	<p>Removal of Underground tank P2 was completed following approval with EA in 2011 and redundant tank is to be backfilled.</p> <p>Fugitive releases of Nitrogen products from Dynea works into liquid effluents were noticed and inter-company discussions have improved matters.</p> <p>Site concreting / tarmacing has been increased following hard winter to maintain impermeability of roadways/bunded areas.</p> <p>No other issues.</p>
Jan 2013	K.Polden/D.Jones/J.Hallard	Annual as permit 4.14	<p>No issues involving fugitives over 2012 .. Review of Warehouse and related storage and overhaul of bunding with further segregation of flammable materials into bespoke bunded areas to improve control of fugitive spillages.</p>

<b>Fugitive Emissions Documentation</b>		<b>Form No. : SYN SHE 72</b>	
Created By:	JTH	Date:	26/01/15
Approved By:	D M Jones	Page 3 of 37	
Version No:	11	Approval Date:	26/01/15

Date	Reviewer	Reason for Review	Amendments
Jan 2014	K.Polden/ D.Jones /J.Hallard	Annual as permit 4.14	No new emissions identified. Small spillages dealt with under incident procedures.  IP 13/14_Continuing the review process, Lining of old lagoon completed in 2013 should see a significant reduction in potential for seepage into groundwater /soil. Minor typos from previous reviews corrected.
Jan 2015	K Polden/D Jones	Annual as permit 4.1.4	No new emissions identified. Small spillages dealt with under incident procedures.  Synthite to undertake a review of bunding against CIRIA Document : Containment Systems for Prevention of Pollution during 2015