Cyfoeth Naturiol Cymru
Natural Resources Wales

# Statutory Notice

## The Environmental Permitting (England and Wales) Regulations 2016
## Regulation 61(1)

**NOTICE REQUIRING INFORMATION**

To: The Company Secretary
Hexion UK Limited
Sully Moors Road
Penarth
Vale of Glamorgan
CF64 5YU

This notice relates to the activities you operate that are authorised by the permit number(s) specified below (each permit number is shown with the appropriate operating address).

| Permit number | Operator | Site address |
|---|---|---|
| EPR/PP3238LX | Hexion UK Limited | Barry Thermosets Plant<br>Sully Moors Road<br>Barry<br>Vale of Glamorgan<br>CF64 5YU |

**Natural Resources Wales** requires you to provide the information specified in the attached Schedule 1 in respect of each Permit referred to above:

- For every calendar year by the 31st March of the following year, until further notice is given.
- The information must be provided by submission of an electronic return via the reporting system http://prtr.defra.gov.uk/data-entry-system/

**Date: 4 January 2017**

**Signed:** [redacted]
**Caitriona Harvey**
**Industry and Waste Regulation Taff & Ely Team Leader**

Natural Resources Wales
Rivers House
Fortran Road
St Mellons
Cardiff
CF3 0EY

**Please see over for notes.**

## The Environmental Permitting (England and Wales) Regulations 2016 Regulation 61(1)

## Notes:

**General**

1. For the purposes of discharging its functions under the Environmental Permitting (England and Wales) Regulations 2016, Natural Resources Wales may (by virtue of Regulation 61(1) of those Regulations), require any person to provide information.

2. Failure to comply with this notice without reasonable excuse is an offence under Regulation 38(4)(a) of the Environmental Permitting (England and Wales) Regulations 2016, and may lead to legal action being taken against you.

3. Making any statement in response to this notice that you know to be false or misleading in a material particular, or recklessly making any statement which is false or misleading in a material particular is an offence under Regulation 38(4)(b) of the Environmental Permitting (England and Wales) Regulations 2016, and may lead to legal action being taken against you.

4. There is no right to appeal against this notice.

5. You may wish to seek independent legal advice.

**Legislation note**

In this document "Natural Resources Wales" means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012. On 01 April 2013 the Natural Resources Body for Wales (Functions) Order 2013 transferred the relevant functions of the Countryside Council for Wales, and functions of the Environment Agency and the Forestry Commission in Wales to the Natural Resources Body for Wales.

**SCHEDULE 1**
**INFORMATION REQUIRED**

# NRW Emissions Inventory – Schedule 1

In Wales, emissions to air, water and off-site transfers of waste and of specified substances in wastewater[1] are collected annually to enable us to report to the European Environment Agency for the European Pollution Release and Transfer Register (E-PRTR) and to DEFRA for the UK Pollutant Release and Transfer Register (UK-PRTR) and the National Atmospheric Emissions Inventory (NAEI). The information we collect is used to provide information to the general public and policy makers, so that they can make informed decisions about how we manage our environment for future generations. You are required to report information relating to the annual releases[2] of substances specified in this Schedule.

Release and transfer information must be submitted in accordance with the dates specified in the enclosed Environmental Permitting (England and Wales) Regulations 2016 Regulation 61 (1) Notice.

The information required by this Schedule should be reported to us via DEFRA's web-based PRTR reporting system, http://prtr.defra.gov.uk/data-entry-system/

For new facilities, login details will be sent to the same email address that this notice is sent to unless you tell us otherwise. This email address will be the username for the web-based reporting system. If you already have a login for this system, the login details will remain unchanged.

This Schedule is valid from 1st January 2017 until revised.

The web-based reporting system consists of the following main parts:

1. Dashboard
2. Edit your details
3. Facility data entry –
   - Releases to air
   - Releases to waters (controlled waters)
   - Wastewater transfer[1]
   - Non-hazardous (off-site transfer of non-hazardous waste in the UK)

[1] Transfers in wastewater should include masses of specified substances in any wastes transferred via sewer or other means (e.g. tanker) direct to waste-water treatment works.
[2] A release is "any introduction of pollutants into the environment as a result of human activity, whether deliberate or accidental, routine or non-routine, including spilling, emitting, discharging, injecting, disposing or dumping or through sewer systems without final waste-water treatment."

Hazardous, domestic (off-site transfer of hazardous waste in the UK)
Hazardous Transboundary (Overseas waste transfers)

The requirements of each part are set out below. Full details of what is in each section of the reporting system and full user instructions can be found on the reporting tool website

## Dashboard

The dashboard will provide details of each of your facilities and at which point in the submission process they currently rest. It will also show a date stamp to help track when the data was last reviewed and updated.

## Edit your details

This section will contain and allow you to edit information such as name, email address, company, parent company and password.

## Facility data entry

### Releases to air, water and wastewater

The following tables list the individual reportable substances for each environmental medium (air, water and wastewater) and the reporting thresholds that apply to those substances.

The information you will have to provide for each reportable substance includes:

- **Total releases** - the sum of **all** releases from the 'reporting unit' (reporting unit describes EPR permitted facility) including *fugitive* emissions. These should be expressed in kg/year to three significant figures. If the total releases are below the reporting threshold then leave the cell blank. The *Remarks* field may be used to record comments e.g. to indicate that the substance is released below the reporting threshold.

- **Accidental releases** – these are unplanned and un-permitted emissions of a particular substance or substances. There is no reporting threshold for accidental releases so all accidental releases should be reported. If there have been no accidental releases, leave the cell blank.

Please note that operators are encouraged to provide data where data is available even when releases and transfers are below reporting threshold for completeness of the data set.

Substances not released should be left blank.

### Method of release determination

This requires identification of the method used to generate the reported releases and transfers, that is *M* = *Measurement*, *C* = *Calculation* or *E* = *Estimation*. Where the data reported is based on *Measurement* or *Calculation*, further details are required. Please refer to the Operator User Guidelines available on the reporting tool website

## Releases to air

| Reportable Substance | CAS no. | Reporting threshold (kg) *** |
|---|---|---|
| 1,1,1-trichloroethane (methyl chloroform) | 71-55-6 | 100 |
| 1,1,2,2-tetrachloroethane (tetrachloroethane) | 79-34-5 | 50 |
| 1,2,3,4,5,6-hexachlorocyclohexane (HCH) | 608-73-1 | 10 |
| 1,2-dichloroethane (ethylene dichloride) (EDC) | 107-06-2 | 1 000 |
| Aldrin | 309-00-2 | 1 |
| Ammonia | 7664-41-7 | 10 000 |
| Anthracene | 120-12-7 | 50 |
| Arsenic and compounds as As | | 20 |
| Asbestos | 1332-21-4 | 1 |
| Benzene | 71-43-2 | 1 000 |
| Benzo(a)pyrene | 50-32-8 | 1 |
| Benzo(b)fluoranthene | 205-99-2 | 1 |
| Benzo(g,h,i)perylene * | 191-24-2 | 1 |
| Benzo(k)fluoranthene | 207-8-9 | 1 |
| Beryllium * | 7440-41-7 | 1 |
| Butadiene (1,3-butadiene) | 106-99-0 | 100 |
| Cadmium and compounds as Cd | | 10 |
| Carbon dioxide | 124-38-9 | 100 000 000 |
| Carbon dioxide excluding biomass ** | 124-38-9 | 100 000 000 |
| Carbon monoxide | 630-08-0 | 500 000 |
| Chlordane | 57-74-9 | 1 |
| Chlordecone | 143-50-0 | 1 |
| Chlorine and inorganic chlorine compounds - as HCl | | 10 000 |
| Chlorofluorocarbons (CFCs) | | 1 |
| Chromium and compounds as Cr | | 100 |
| Copper and compounds as Cu | | 100 |
| Di-(2-ethylhexyl) phthalate (DEHP) | 117-81-7 | 10 |
| Dichlorodiphenyltrichloroethane (DDT) | 50-29-3 | 1 |
| Dichloromethane (DCM) (methylene chloride) | 75-09-2 | 1 000 |
| Dieldrin | 60-57-1 | 1 |
| Dioxins and furans (PCDDs/PCDFs) - as I-TEQ | | 0.00001 |
| Dioxins and furans (PCDDs/PCDFs) - as WHO TEQ | | 0.00001 |
| Endrin | 72-20-8 | 1 |
| Ethylene oxide (1,2-epoxyethane) | 75-21-8 | 1 000 |
| Fluorine and inorganic fluorine compounds - as HF | | 5 000 |
| Halons | | 1 |
| Heptachlor | 76-44-8 | 1 |
| Hexabromobiphenyl | 36355-1-8 | 0.1 |
| Hexachlorobenzene (HCB) | 118-74-1 | 10 |

| Reportable Substance | CAS no. | Reporting threshold (kg) *** |
|---|---|---|
| Hydrochlorofluorocarbons (HCFCs) | | 1 |
| Hydrofluorocarbons (HFCs) | | 100 |
| Hydrogen cyanide | 74-90-8 | 200 |
| Indeno(1,2,3-cd)pyrene | 193-39-5 | 1 |
| Lead and compounds as Pb | | 200 |
| Lindane | 58-89-9 | 1 |
| Manganese * | 7439-96-5 | 1 |
| Mercury and compounds as Hg | | 10 |
| Methane | 74-82-8 | 100 000 |
| Mirex | 2385-85-5 | 1 |
| Naphthalene | 91-20-3 | 100 |
| Nickel and compounds as Ni | | 50 |
| Nitrogen oxides (NO and $NO_2$) as $NO_2$ | | 100 000 |
| Nitrous oxide ($N_2O$) | 10024-97-2 | 10 000 |
| Non-methane volatile organic compounds (NMVOCs) | | 100 000 |
| Particulate matter - $PM_{10}$ | | 1 000 |
| Particulate matter - $PM_{2.5}$ | | 1 000 |
| Particulate matter - total | | 10 000 |
| Pentachlorobenzene | 608-93-5 | 1 |
| Pentachlorophenol (PCP) | 87-86-5 | 10 |
| Perfluorocarbons (PFCs) | | 100 |
| Polychlorinated biphenyls (PCBs) | 1336-36-3 | 0.1 |
| Selenium | 7782-49-2 | 100 |
| Sulphur hexafluoride | 2551-62-4 | 50 |
| Sulphur oxides ($SO_2$ and $SO_3$) as $SO_2$ | | 150 000 |
| Tetrachloroethylene (PER) | 127-18-4 | 2 000 |
| Tetrachloromethane (carbon tetrachloride) (TCM) | 56-23-5 | 100 |
| Tin * | 7440-31-5 | 1 |
| Toxaphene | 8001-35-2 | 1 |
| Trichlorobenzene - all isomers (TCBs) | 12002-48-1 | 10 |
| Trichloroethylene | 79-01-6 | 2 000 |
| Trichloromethane (chloroform) | 67-66-3 | 500 |
| Vanadium * | 7440-62-2 | 1 |
| Vinyl chloride | 75-01-4 | 1 000 |
| Zinc and compounds as Zn | | 200 |

* Reporting is optional

** Carbon dioxide emissions minus carbon dioxide from qualifying renewable fuel sources

The combustion of biofuels and materials is considered to be carbon neutral as, providing there is no long-term decline in the total carbon embodied in standing

biomass, this activity does not significantly add to atmospheric carbon concentrations. Therefore national level GHG inventories under the IPCC guidelines exclude carbon dioxide emissions from the combustion of biofuels and materials.

*** Operators are encouraged to submit values for releases below the reporting threshold if they have the data

## Releases to water and transfers to wastewater

The figures for releases to controlled waters and transfers in wastewater should be reported separately.

| Reportable Substance | CAS no. | Reporting threshold (kg) *** |
|---|---|---|
| 1,2,3,4,5,6-hexachlorocyclohexane (HCH) | 608-73-1 | 1 |
| 1,2-dichloroethane (ethylene dichloride) (EDC) | 107-06-2 | 10 |
| Alachlor | 15972-60-8 | 1 |
| Aldrin | 309-00-2 | 1 |
| Anthracene | 120-12-7 | 1 |
| Arsenic and compounds as As | | 5 |
| Asbestos | 1332-21-4 | 1 |
| Atrazine | 1912-24-9 | 1 |
| Benzene | 71-43-2 | 200 (as BTEX*) |
| Benzo(g,h,i)perylene | 191-24-2 | 1 |
| Brominated diphenylethers - penta-, octa- and deca- (PBDE) | | 1 |
| Cadmium and compounds as Cd | | 5 |
| Chlordane | 57-74-9 | 1 |
| Chlordecone | 143-50-0 | 1 |
| Chlorfenvinphos | 470-90-6 | 1 |
| Chlorides - as Cl | | 2 000 000 |
| Chloro-alkanes ($C_{10}$-$C_{13}$) | 85535-84-8 | 1 |
| Chlorpyrifos | 2921-88-2 | 1 |
| Chromium and compounds as Cr | | 50 |
| Copper and compounds as Cu | | 50 |
| Cyanides - as CN | | 50 |
| Dichlorodiphenyltrichloroethane (DDT) | 50-29-3 | 1 |
| Di-(2-ethylhexyl) phthalate (DEHP) | 117-81-7 | 1 |
| Dichloromethane (DCM) (methylene chloride) | 75-09-2 | 10 |
| Dieldrin | 60-57-1 | 1 |
| Dioxins and furans (PCDDs/PCDFs) - as I-TEQ | | 0.0001 |
| Diuron | 330-54-1 | 1 |
| Endosulphan | 115-29-7 | 1 |
| Endrin | 72-20-8 | 1 |
| Ethyl benzene | 100-41-4 | 200 (as BTEX*) |
| Ethylene oxide (1,2-epoxyethane) | 75-21-8 | 10 |
| Fluoranthene | 206-44-0 | 1 |
| Fluorides - as F | | 2 000 |
| Halogenated organic compounds - as AOX | | 1 000 |
| Heptachlor | 76-44-8 | 1 |
| Hexabromobiphenyl | 36355-1-8 | 0.1 |

| Reportable Substance | CAS no. | Reporting threshold (kg) *** |
|---|---|---|
| Hexachlorobenzene (HCB) | 118-74-1 | 1 |
| Hexachlorobutadiene (HCBD) | 87-68-3 | 1 |
| Isodrin | 465-73-6 | 1 |
| Isoproturon | 34123-59-6 | 1 |
| Lead and compounds as Pb | | 20 |
| Lindane | 58-89-9 | 1 |
| Mercury and compounds as Hg | | 1 |
| Mirex | 2385-85-5 | 1 |
| Naphthalene | 91-20-3 | 10 |
| Nickel and compounds as Ni | | 20 |
| Nonylphenols and nonylphenol ethoxylates (NP/NPEs) | | 1 |
| Octylphenols and octylphenol ethoxylates | 1806-26-4 | 1 |
| Organotin compounds - as Sn | | 50 |
| Pentachlorobenzene | 608-93-5 | 1 |
| Pentachlorophenol (PCP) | 87-86-5 | 1 |
| Phenols - as total C | 108-95-2 | 20 |
| Polychlorinated biphenyls (PCBs) | 1336-36-3 | 0.1 |
| Polycyclic aromatic hydrocarbons (PAHs) | | 5 |
| Simazine | 122-34-9 | 1 |
| Tetrachloroethylene (PER) | 127-18-4 | 10 |
| Tetrachloromethane (carbon tetrachloride) (TCM) | 56-23-5 | 1 |
| Toluene | 108-88-3 | 200 (as BTEX*) |
| Total nitrogen | | 50 000 |
| Total organic carbon (TOC) | | 50 000 |
| Total phosphorus | | 5 000 |
| Toxaphene | 8001-35-2 | 1 |
| Tributyltin and compounds - as TBT | | 1 |
| Trichlorobenzene - all isomers (TCBs) | 12002-48-1 | 1 |
| Trichloroethylene | 79-01-6 | 10 |
| Trichloromethane (chloroform) | 67-66-3 | 10 |
| Trifluralin | 1582-09-8 | 1 |
| Triphenyltin and compounds - as TPT | | 1 |
| Vinyl chloride | 75-01-4 | 10 |
| Xylene - all isomers | 1330-20-7 | 200 (as BTEX*) |
| Zinc and compounds as Zn | | 100 |

* single pollutants are to be reported if the threshold for BTEX (the sum parameter of benzene, toluene, ethyl benzene and xylenes) is exceeded.

*** Operators are encouraged to submit values for releases below the reporting threshold if they have the data

## Off-site waste transfers

This includes all off-site transfers of activity-related wastes **except** wastewaters which should be reported separately as chemical-specific transfers in the wastewater transfer section. An off-site transfer of waste means the movement beyond the boundaries of a facility of waste destined for disposal or recovery.

Operators shall report off-site transfers of:

- hazardous waste (HW) exceeding 2 tonnes per year.
- non-hazardous waste (non-HW) exceeding 2,000 tonnes per year.

For off-site transfers of activity-related wastes, the following information should be provided:

- Weight, in tonnes;
- Identification of the method used to generate the reported data, that is *M* = *Measurement*, *C* = *Calculation* or *E* = *Estimation*, including further details of any *Measurement* or *Calculation* method used.
- Transfers to disposal and recovery should be recorded separately
- Transfers of hazardous and non-hazardous waste should be recorded separately.

## Transboundary waste transfer

Any activity-related hazardous waste that is sent directly overseas for disposal or recovery should be reported.

The following information should be provided:

- Total Weight in tonnes;
- Identification of the method used to generate the reported data, that is *M* = *Measurement*, *C* = *Calculation* or *E* = *Estimation*, including further details of any *Measurement* or *Calculation* method used;
- Details of the Disposal company and disposal sites. A library of disposal companies and sites is held in the database. Site and companies not in the library can be created, please see the Operator User Guidelines available on the reporting system website for full details on how to do this.

## Further information

Additional guidance is available for intensive agriculture installations.

Further information on the requirements of E-PRTR including information on the industrial activities required to report under E-PRTR can be found on the *European Pollutant Release and Transfer Register (E-PRTR)* website http://prtr.ec.europa.eu/