



TS RESINS LIMITED

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Registered Office: Mold, Flintshire. Company Registration No.: 8263403

Ms S McGregor-Andrew
Natural Resources Wales
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Your Ref: EPR/UP3831ES
Our ref: EPR returns 2019
Date: 8th January 2020

Dear Ms McGregor-Andrew,

I enclose the following EPR returns for TS Resins Ltd:

Form A1 – Emissions to air
Form E1 – Energy usage
Form R1 – Waste disposal and recovery
Form PA1 – Performance indicators
Form WU1 – Water usage
Sections 4.1.4 and 4.1.5 returns

During the year there were the following:

1. Monthly checks on the state of the tank farm bunds showed no leaks.
2. There were no emissions from point F516.
3. There were no fugitive emissions from valves, pumps etc. Emissions from the tank farm will be included in the PRTR returns.
4. There were no noise or odour issues that could be attributed to TS Resins operations.
5. TS Resins renewed its hazardous waste registration during the year.
6. A submission was made under the waste packaging regulations.
7. TS Resins had no external environmental complaints.



Production is continuing to target specialist resins with lower volumes but higher margins. This has a negative effect on our energy balance as most of these resins are distilled and the reduction in volume affects our baseload distribution. Towards the end of the year, the company secured a contract with a major competitor to carry out toll production on their behalf and we expect volumes to increase once trial production moves to full scale production.

Submissions were made via the CIABATA energy trading agreement. A full two year submission was made for the 2017/2018 period. There was a shortfall which was made up by buying carbon credits.

Water use per tonne of product decreased in 2019 even with a significant increase in water use. This is attributed to a significant increase in production due to a toll manufacturing agreement agreed during the year. As part of this agreement, there has been an increase in the number of reactor washing required. We are working on reducing this as production stabilises.

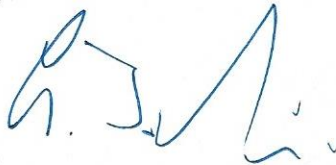
Waste recycling on site increased to 75%. Recycling of liquors to Synthite effluent treatment plant has increased and the site is working on waste reduction and recycling. Most resins currently produced are specialist resins and they have a lower tolerance to rework or process water. Waste generated per tonne of product increased significantly, mostly as a result of the increase in reactor washouts.

The 'Ageing Plant' programme is continuing. All reactors have been inspected as well as all tanks holding hazardous substances. Resin storage tanks are being cleaned and inspected on a rolling programme and most were completed in 2019. Five year external inspections were carried out on several hazardous tanks in 2018 and this is continuing in 2019.

TS Resins was accredited to ISO9001 2015, ISO14001 2015 and our OHSAS18001 2007 accreditation was renewed. We continue to play an active role in the CIA North Wales Responsible Care cell.

Synthite Ltd are continuing with their programme of work in response to actions raised from the safety report submission and TS Resins are assisting as required under the Domino arrangement between Synthite Ltd and TS Resins Ltd.

Yours sincerely,



Greg Hickman