



TS RESINS LIMITED

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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 reports for sections 4.1.4 (fugitive emissions) and 4.1.5 (targets and achievements) of our EPR permit.

The following officers have responsibility for operations at the Alyn Works site:

EPR/PPC	TS Resins	Sian McGregor-Andrew
	Synthite	Sian McGregor-Andrew
NRW/COMAH	TS Resins	Ian Oakes
	Synthite	Ian Oakes
Health and Safety Executive	TS Resins	Matt Lea
	Synthite	Barbara Francis

A programme will be developed for 2020 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, valves 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 to uncontained areas. As part of bringing UF storage tanks back into operation, several loading points have been moved into bunded areas. Where possible, bottom loading of tankers has been introduced.
Zero spills from resin storage to contained areas	Met.	No spills within containment (minor controlled spills from sampling, filter cleaning and routine maintenance).
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. PF resins are exported direct to tankers and do not contain free phenol. Tank emissions are included in the site PRTR returns. 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 (see EPR returns form A1).

Condition 4.1.5 Targets and Achievements

Target	Actual	Comments
Maintain ISO 14001 accreditation.	Accreditation maintained.	Accredited to ISO 14001:2015. No non-conformances.
Maintain ISO 9001 accreditation.	Accreditation maintained.	Accredited to ISO 9001:2015. One minor non-conformance.
Maintain OHSAS 18001 accreditation.	Accreditation maintained.	Accredited to OHSAS 18001. One minor non-conformance and one observation. Working towards ISO 45000 accreditation.
Submit EPR returns by the 31 st January 2019.	Submitted on time.	
Submit PRTR returns by the 31 st March 2019.	Submitted on time.	
CIA climate change levy return under CIABATA for compliance with CCL agreement.	Met.	Two year target period 2017/2018 submitted successfully. Carbon credits purchased to meet target.
Stack emissions monitoring by the end of May 2019.	Monitoring carried out.	All permitted species within licence limits.
Assist with testing of the External plan as part of Synthite's obligations.	Met	TS Resins provide staff as players and observers for testing of the External Plan as part of their Domino obligation.
Continue 'in house' stack emissions monitoring.	Met. Ongoing.	
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.	
Carry out two borehole sampling cycles.	Met.	Common site SPMP programme with two sets of sampling carried out annually.
SPMP review	Met.	
Submit EP OPRA scoring as requested.	Met.	
Respond to NRW requests as they arise.	Met.	

Target	Actual	Comments
70% waste recycling internally.	Met.	During 2019 the internal waste recycling rate was 76%.
Greater than 90% waste recycling or recovery (internal and external).	Met.	Overall recycling rate of 98.1%.
75 kWh energy per tonne of product.	Not met.	Actual of 150 kWh (including office, personal transport and site transport). Significant reduction over previous years due to an increase in production. Energy use is highly dependent on product mix. Significant increase in reactor boilouts that use steam and electricity.
100% distillate recycling.	Met.	
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.	
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.	Domino meetings are no longer required as there is a common site HSE structure – staff attend safety meetings for both companies and there is close co-operation for all safety and Major Accident Hazard requirements.
Carry out emergency training.	Met.	Office evacuations carried out during the year. On-site incident (leaking water main on site). Site Internal Emergency Plan activated and worked well.
Submit hazardous waste registration if needed.	Met.	Hazardous waste registration required and made in September 2019.