

25<sup>th</sup> August 2020

Mr I Oakes  
Natural Resources Wales  
Chester Road  
Buckley  
Flintshire  
CH7 3AJ

Dear Mr Oakes

**PART B REPORT (SCHEDULE 1) – PPC PERMIT NUMBER BU 2357**

Please find enclosed the information provided as a Part B report for the following Part A notification:-

Part A ref. N°. 11/08/2020 - A

Yours sincerely  
FOR WARWICK INTERNATIONAL GROUP LIMITED



MR PETER BRYANT  
HEALTH SAFETY, ENVIRONMENT & SECURITY MANAGER

<b>TITLE :</b>	Part 'B' Report Form		<b>ISSUE NO.</b>	15.0
<b>REF :</b>	RCF20	<b>AREA:</b>	SITE	
<b>RELATED DOCUMENT:</b>	WI 903 App C		<b>DATE OF ISSUE:</b>	08.05.13
<b>FILENAME:</b>	Part B Form 11th August 2020 acid FD2 Plant scrubber		<b>PAGE:</b>	2 of 2
			Last printed 23/09/2020 11:34:00	



Part B Notification (schedule 1) in accordance with condition 5 (5.1.1 and 5.1.2) of PPC Permit BU 2357.

## **REFERENCES**

Part A form, Ref. N<sup>o</sup>. 11/08/2020 - A

## **Further, more accurate information on the matters for notification under Part A.**

Q3 2020 scheduled scrubber monitoring was being carried out by the QC Laboratory technician on the 11<sup>th</sup> August 2020. The result from the Filter Dryer 2 (FD2) Plant scrubber was 102mg/m<sup>3</sup>. The sample tube was checked to see if there had been any contamination of the secondary part of the sample tube. The sample tube was found to be in good order indicating the result was representative.

The FD2 Plant scrubbing system was checked out to try to identify what the problem was. The sodium hydroxide solution in the scrubber was found to be within the required % limits, circulation pumps were working and the fan unit was fully operational.

Further investigation had identified that one of the vacuum pumps for the FD2 plant had suffered a fault with a seal failure. It is thought that this failure allowed a build-up of acetic anhydride fumes to pass through the scrubbing system before the back-up vacuum pump came online. This 'pulse' of acidic fumes would be picked up by the monitoring tube and would account for the high reading.

## **Measures taken (or intended to be taken) to prevent a recurrence of the incident.**

The vacuum pumps are checked by the manufacturing team each shift and are maintained by the Engineering Department. There is a back-up vacuum pump that can be utilised to recover the vacuum in the drying system. Equipment failure is not always predictable, the installed system monitoring equipment will provide early warning of any failure allowing the manufacturing staff to recover the situation or to safely shut down. The Q3 2020 monitoring picked up one of these failures indicating the level of emission possible. The scrubbing system was re-tested the next week and the emissions were found to be within the consent limits.

## **Measures taken (or intended to be taken) to rectify, limit or prevent any pollution of the environment or harm which has been or may be caused by the emission.**

There was no indication of acidic smells in the local vicinity or other areas on the Plant. It is thought that no measurable environmental damage has occurred as a result of this incident.

## **Dates of unauthorised emissions from the installation in the previous 24 months.**

13/06/2018, 28/09/2018, July/Aug 2018, July/Aug Sept 2018, Sept/Nov/Dec 2018, July/Aug/Sept/Oct/Nov 2018, 10/04/2019, 13/06/2019, 11/09/2019, July-November 2019, September – November 2019, 01/01/2020, 02/01/2020, 08/01/2020, 01/02/2020, 03/02/2020, 18/02/2020, 30/04/2020, 12/05/2020, 12/06/2020.