

Natural Resources Wales permitting decisions

TS Resins Limited (Alyn Works) Decision Document

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Variation

The variation number is: **EPR/UP3831ES/V002**

The applicant/operator is: **TS Resins Limited**

The Installation is located at: **Alyn Works, Denbigh Road, Mold, Flintshire, CH7 1BT**

TS Resins Limited have converted a storage tank (T586), that had been previously used to store AdBlue solution, for use as a dedicated on-site storage tank for 33.6% aqueous ammonia solution used to fill the Intermediate Bulk Containers (IBCs). This variation implements the operations occurring under a trial of this technique (under condition 1.5 of the original permit EPR/UP2322IF) that started in May 2020.

Ammonia emissions from the tank are ventilated through a catalytic oxidiser listed as emissions point A7, in the permit EPR/BU2349IL operated by Synthite Limited. Synthite Limited and TS Resins Limited have submitted two letters outlining the agreement between the operators to this arrangement.

We have decided to issue the variation for Alyn Works operated by TS Resins.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Key issues of the decision

Receipt of application

Confidential information

A claim for commercial or industrial confidentiality has not been made.

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.

Consultation

There was no requirement to carry out a consultation on this minor technical variation. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.

Operator

There is no change to the Operator as part of this variation.

The facility

The regulated facility is an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations and the following directly associated activities.

- Section 4.1 Part A(1) (a) (viii) Producing organic chemicals such as plastic materials (for example polymers, synthetic fibres and cellulose-based fibres).

This permit applies to only one part of the installation – manufacturing of formaldehyde resins including urea formaldehyde and phenol formaldehyde resins with some production of melamine urea formaldehyde and melamine formaldehyde resins. The names and permit numbers of the operator of other parts of the installation are detailed in the introductory note in the variation notice.

This variation is for TS Resins Limited have converted a storage tank (T586), that had been previously used to store AdBlue solution, for use as a dedicated on-site storage tank for 33.6% aqueous ammonia solution used to fill the Intermediate Bulk Containers (IBCs). This variation implements the operations occurring under a trial of this

technique (under condition 1.5 of the original permit EPR/UP2322IF) that started in May 2020.

Ammonia emissions from the tank are ventilated through a catalytic oxidiser listed as emissions point A7, listed in the permit EPR/BU2349IL operated by a separate legal entity Synthite Limited.

Legislation

NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources.

All applicable European directives have been considered in the determination of the application.

The site

The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility including the location of the part of the installation to which this permit applies on that site.

A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.

The site part of a multi-operator installation. A site plan was submitted showing the areas of the installation that are operated by the permit holder (TS Resins Limited), the other operator (Synthite limited) and the emission point A7 operated by Synthite limited under the permit EPR/BU2349IL.

Biodiversity, Heritage, Landscape and Nature Conservation

The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.

It was determined that an assessment was not required. All emissions occur via an already existing emission point and will meet current emission limit values (ELVs). There are no changes to any of the ELVs as a result of this variation.

Environmental Risk Assessment

Air

There are no changes to emissions to air as part of this variation.

The emissions from the tank are ventilated through an already existing emission point A7 with a set emission limit value.

Emission limits

There are no changes to emission limits as a result of this variation. Due to the emission being ventilated via emission point A7 (EPR/BU2349IL), there are existing ELV limits in place and will not change as a result of this variation.

Odour

The variation is for storage of ammonia. All fumes from the tank are ventilated through the catalytic oxidiser before release through emission point A7 which already has ELV limits on ammonia in place.

Monitoring

Monitoring of ammonia emissions through emission point A7 is covered under the requirements of the Synthite permit EPR/BU2349IL. Both operators (TS Resins Limited and Synthite Limited) have agreed, in writing that Synthite are responsible for compliance (including monitoring) for emission point A7.

The permit conditions

Conditions where the consent of another person is needed.

Based on the information submitted in the application, we consider that it is necessary to impose conditions where the consent of another person is needed.

We have imposed an conditions in order to for the operator (TS Resins limited) to inform the other operator (Synthite limited).

The ventilated ammonia emission from both the tank T586 and the IBCs are vented via a catalytic oxidiser and emission stack A7. This emission stack is owned and operated by another operator, Synthite Limited on the installation and is located outside the installation boundaries of TS Resins Limited. The emission stack A7 is controlled by the environmental permit EPR/BU2349IL

We asked both TS Resins Limited and Synthite limited to produce letters of agreement which form part of the operating techniques. These letters state that TS Resins limited have permission from Synthite Limited to use the catalytic oxidiser and emission point A7 for the ventilation of the tank T586. These letters also state that Synthite limited would take responsibly for all permit compliance relating to the emission point A7.

Incorporating the application

We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.

These descriptions are specified in the Operating Techniques table in the permit.

These were required due to the ventilation of ammonia emissions through the emission point A7 permitted under EPR/BU2349IL and operated by Synthite Limited. As the permit EPR/BU2349IL is owned and operated by a separate legal entity there was a requirement for letters of agreement between the two operators in order for there to be no ambiguity as to who is responsible in terms of permit compliance for emission point A7.

Environment management system

There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.

Relevant convictions

Our Enforcement Database has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found.

OPRA

The OPRA score at permit issue is 171. The OPRA score has not changed as part of this variation.