Mostyn Manufacturing Site

22nd April 2021

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. Nº. 24/03/2021 - A

Yours sincerely
FOR WARWICK INTERNATIONAL GROUP LIMITED

MR PETER BRYANT
HEALTH SAFETY & ENVIRONMENT MANAGER

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. Nº. 24/03/2021 - A

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

This NO_x consent breach was identified when the quarterly results (Q1 2021) were being processed. The initial data capture from the Rockewell system had to be run a couple of times as there had been a Pi software system upgrade which had not been installed. This led to a delay in the identification of the breach.
Discussions with the manufacturing staff has shown that the incinerator unit had been affected during the weekly boiler blowdown checks and had to be restarted. The restart proved to be problematic and the NO_x readings remained high and unnoticed for some time. The reading was then seen, and the steam atomising valve adjusted to bring the NO_x emission value down.

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

Communications between the maintenance team and the manufacturing team have been reviewed and it is usual practice for the maintenance team to provide a warning about the boiler checks being carried out. It was thought that this was carried out at the time so the manufacturing team should have been ready for any upset to the running conditions. The re-start problems do occur from time to time with a quick recovery possible with the more experienced operator.
The adjustment (or in this case, lack of timely adjustment) of the steam atomising valve following start up was a contributory cause to the breach, lack of observation of the high NO_x value being the root cause.
The monitor that shows the incinerator information has a 'flicker' and requires changing; this may have been why the high reading was initially missed. The SOP has been checked and the start-up instructions are clear, as are the system up-set recovery steps.

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.

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.

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, 11/08/2020, 20/09/2020, 06/11/2020, 30/11/2020, 12/01/2021, 24/03/2021.