



# SYNTHITE LIMITED

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Your Ref: EPR/BU2349 CAR\_NRWEP0034677  
Our ref: CAR response Q4 2018  
Date: 19<sup>th</sup> February 2019

Dear Ms McGregor-Andrew,

With regard to your CAR report regarding the 2018 annual returns and the burst water main in December 2018, I respond to the actions raised.

## 1. Review reporting and notification procedure. Due date 14/03/2019.

This refers to the late notification of the burst water main. All staff who have a role in emergency response have been given the contact details for Natural Resources Wales and the Health and Safety Executive.

- NRW – 0300 065 3000
- HSE – 0845 345 0055

Staff have been told to put these numbers in their work supplied mobile phones so that the above can be contacted. A full list of emergency contacts is in the Internal Emergency Plan. Copies of this plan are located in all site Control Rooms and Emergency Control Centres. Essential staff also have copies of the Internal plan in their mobile phones.

The action proposed above will address the 'notification without delay' as per Condition 5.1.1.4. Further to this, Welsh Water had advised the site that Resilience Direct had been informed and Bronze and Silver Commands had been activated – we would have expected a cascade call to NRW as a result of this activation.

The incident was first noticed by site staff around 18:00 on 05/12/2018. NRW were informed in writing at 12:43 on 06/12/2018 – within the 24 hr period for notification under Condition 5.1.2.



**2. Review storage arrangements for IBC and other containers stored outdoors in the lower end of the yard. Due date 05/04/2019**

These IBCs are the responsibility of TS Resins. The lower end of the site is used to store empty new IBCs and empty reconditioned IBCs. These do not have the potential to cause pollution, but may float in sufficiently high water conditions. The site boundary fence would prevent any empty IBCs leaving the site (as per an agreement with a previous Inspector, TS resins only store IBCs at a maximum height of 2 to prevent overtopping of the site boundary fence). Full IBCs are stored at a higher level on site and are less susceptible to flooding.

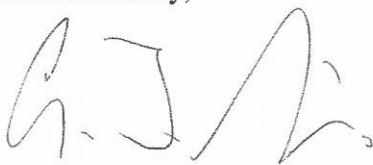
Synthite and TS Resins have discussed the conclusions from the burst water main incident. The following has been agreed:

- All IBCs that contain or have contained chemicals are to be stored above the datum line that equates to the phenol storage tank (T431). This will ensure the IBCs are above any potential flood (the retaining wall at the lower end of the site has a lower datum).
- New and reconditioned IBCs are to be stored nearer to the centre of the site, preferably near the warehouse or near the Blending Shed. When this cannot be achieved (some new products are discharged to different designs of IBC so stocks can vary significantly), the Plant Manager has responsibility to monitor the situation.
- The environmental check sheet has been modified to note the number of new/reconditioned IBCs near the site lower boundary.

**3. Review reporting and notification procedures. Due date 14/03/2019**

This refers to the late submission of the Q4 and annual returns. Two staff are involved in the collation of data and the subsequent submission. Due to carry over of leave from 2018 there were delays in collation, checking and reporting. This has not happened before. A review of staff responsibilities has taken place and one person now has overall responsibility for the collation and submission of data. There is a designated deputy to support in the event of the primary contact not being available.

Yours sincerely,



Greg Hickman

HSE Officer  
Synthite Ltd