



**Contract Chemicals**

Contract Chemicals  
(Knowsley) Limited

Environmental Statement | 2007

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Responsible Care



To operate professionally and responsibly in the world of chemical manufacturing, it is of the utmost importance that environmental and safety management responsibilities are assigned the highest priority and the proper resources.

At Contract Chemicals we believe that such an attitude is crucial to underpin the successful all-round operation of our business and the path towards sustainability.

We will embrace the guiding principles and goals of sustainable development by adopting innovative business solutions that help satisfy society's needs whilst optimising use of resources; ensuring all reasonable steps have been taken to prevent harm to human health and the environment; demonstrating good practice in ethical behaviour; adopting the highest standards of corporate governance and accountability.

To this end we have shaped our policies and set out our stall to fulfil the promise to our employees, our business partners and our neighbours in the community to act within the principles and guidelines of the Responsible Care programme of the Chemical Industries Association. In this we are an active member both locally and nationally.

Our dedication is not skin-deep. It embraces our processes, our investment programmes, our training, our management systems and the appearance and aesthetics of our sites. It is with us every day. It is a cornerstone of our future and it is a matter of honour that we keep on seeking improvement.

This environmental statement reflects our continuing commitment to excellence in environmental management by informing you about our activities and the environmental aspects of our business.

With this step Contract Chemicals wishes to demonstrate that it will pursue a policy of openness and continual improvement in environmental management performance.

This environmental statement summarises our current environmental performance and will be updated and reissued by 30th April 2009.

Our published environmental policy appears in appendix 1.



Dr Tony Bastock OBE

Group Managing Director



Stephen Ockleshaw

Quality, Safety and Environmental Manager



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COOPER'S LANE

EAST LANCASHIRE ROAD A580

PENRHYN ROAD

KITLING ROAD

SCHOOL LANE B5194

KNOWSLEY LANE B5202

M57 JUNCTION 4

## 2.1 Site Location

Contract Chemicals is located on the Knowsley Business Park, near Junction 4 of the M57, between Liverpool and St. Helens. The Company is British with headquarters in Knowsley and has developed modern chemical manufacturing facilities at Knowsley since the site was acquired in 1983. The site was originally developed from 'greenfield' status by the previous owners in 1978 and used to manufacture sugar based chemicals. The site covers an area of approximately 9 acres and employs around 100 staff

## Site surroundings

To the North the site is bordered by the A580 trunk road and Knowsley Industrial Park. To the South is an open, partially developed Business Park and the village of Knowsley. To the East and West lie neighbouring industrial businesses on the Knowsley Business Park.

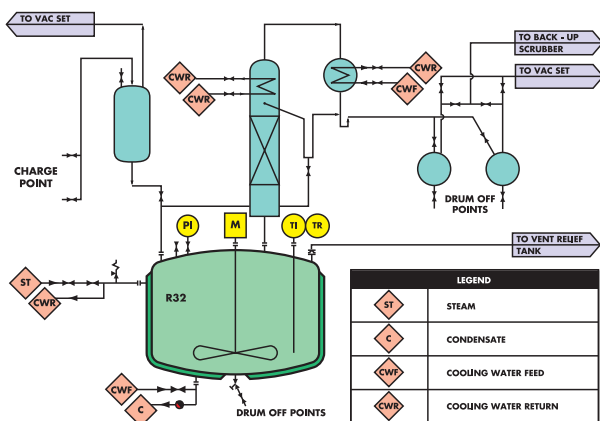
## 2.2 Site Activities

On the Knowsley site Contract Chemicals manufactures a wide range of chemical and intermediate products for the international pharmaceutical, agrochemical, food, photographic, and allied industries.

The manufacturing processes used are based on traditional synthetic organic chemistry. They create the chemical building blocks required by an increasingly sophisticated world market. The chemical reactions are carried out in vessels ranging in size from 200 to 30,000 litres. Typical materials of construction would be glass lined, stainless steel or more exotic alloys depending on the corrosive nature of the reaction mixture.

Raw materials are delivered to the site by road and fed to the reactors from drums or bulk storage. They are then reacted together under tightly controlled time and temperature conditions until the reaction has reached completion. The precise control of the manufacturing sequence is vital to the yield and purity of the final product.

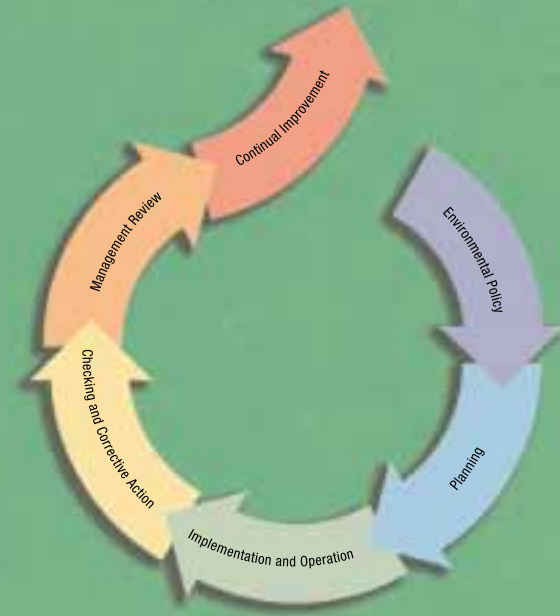
The end product is then purified, if necessary, by techniques such as crystallisation, distillation and solvent extraction. If the product is a solid it will normally require drying and sieving. After quality control testing the product is packed and labelled before being despatched from the site by road.



### 3.1 Environmental Management System Standards

Contract Chemicals has for some time been a member of the Chemical Industries Association (CIA) and a signatory to their Responsible Care programme, which establishes internationally recognised principles of environmental management. During 1993 the Company decided to obtain external certification of the environmental management system to the British Standard BS7750. To achieve this the management formalised and documented several aspects of the environmental management system in the form of an environmental manual which:

- sets the context and importance of environmental management and is based on the policy statement;
- documents key management procedures and defines associated responsibilities;
- establishes a framework for operational control, environmental monitoring and reporting;
- provides for an environmental audit programme with corrective actions;
- defines and documents significant environmental aspects and relevant controlling laws and regulations;
- establishes training responsibilities;
- provides for a regular review of the environmental management system;
- provides for the setting of improvement objectives and establishes a programme to achieve those objectives.



The environmental management system of Contract Chemicals Knowsley site was independently audited by BSI and certified as meeting the requirements of BS7750 in 1995. (Certificate Number 32381). This certification was confirmed by BSI as consistent with the requirements of ISO 14001 in 1997.

During 1998 the Company was the first to gain an Integrated Management System (IMS) certificate by BSI. This certification was confirmed by BSI as consistent with OHSAS 18001 in 2000. The management system has combined the quality, occupational health and safety and environmental aspects of the business in a more holistic approach.

Six monthly reviews of the environmental management performance by BSI are carried out as part of the maintenance of the certification.



### 3.2 Information and Communications

The site is visited by companies, members of the public and organisations who come to obtain information on production, quality, environmental protection and safety. The site plays an active role in the establishment of education links with both primary and secondary level schools. In particular it encourages a wider understanding of chemicals and their impact upon the environment.

The range of activities include:

- School visits to the site,
- Support for school industry projects
- Participation on local authority committees
- Industry training schemes

Representatives from the site attend the area CIA cell on Responsible Care. The cell aims to ensure co-operation and transfer of information between local companies coupled with involvement in the community.

### 3.3 The Knowsley site in 2007

The company continues to embrace the guiding principles of sustainable development, an initiative driven by CIA and promoted throughout the chemical industry.

There were no verified environmental complaints during 2007 from our neighbours and no breaches in our emission limits for air and trade effluent.

A revised trade effluent consent has been agreed with United Utilities PLC, with new consent parameter's to consider in 2008.

An ongoing review of operator competency was initiated in 2007 with a view to ensuring the necessary environmental and safety controls are maintained.

The company will continue in 2008 to formalise its approach to registrations of its chemicals under REACH. This will be carried out by the summer of this year.

#### 4.1 Water and Trade Effluent

Water enters the site via public mains supply, as raw material constituents and as rain. The site has no water abstraction. Knowsley Brook crosses the site in an enclosed culvert. In addition to normal domestic and sanitary use the site uses water mainly for processing purposes.

##### Main Water Uses at Knowsley

- as a liquid seal in vacuum pump systems
- for cooling in condensers and to top up recirculatory water cooling systems
- for product purification purposes
- in air purification systems such as scrubber towers
- for general maintenance and vessel cleaning.


Water leaves the site by four routes:

- by evaporation;
- as contaminated waste water, which is collected and sent off site for processing and disposal by a licensed waste disposal contractor,
- as trade effluent,
- in products.

Water discharged from the site enters the main trade effluent sewer at the plant and flows for treatment to United Utilities Fazakerley treatment works, approximately 1.5 miles to the south-west of the site.

There is no discharge to the culverted stream crossing under the site.

The Company makes use of a flow proportional sampler to allow samples to be collected which are representative of the overall effluent leaving the site. The laboratory analyses effluent on a regular basis for basic parameters such as pH, sulphate content and chemical oxygen demand.



Land around production and transfer areas has been protected with hardstanding surfaces. The Company has previously re-routed all surface water drains so that they either lead directly to the trade effluent sewer or to blind sumps. This provides a high level of ground and surface water protection. In the event of an emergency, such as a spillage, the site can completely close off the trade effluent flow before it leaves the site. Sufficient storage capacity is installed in the line to allow the site to collect effluent, thus providing an appropriate opportunity for emergency response. There are interceptors installed in the site drainage system to collect any small spills.

Trade effluent analysis is carried out by United Utilities on a regular basis to assess management and performance relating to trade effluent control. Contract Chemicals carries out additional analysis to determine areas for effluent quality improvement.

## Trade Effluent Performance 2007

There was no notification by United Utilities of any trade effluent excursions during the year.

Effluent loading figures are based on the analysis of regular samples taken by the company from the trade effluent and were as follows:

### Estimated Discharge Comparison 2002-2007

#### Estimated Discharge 2007

Effluent Volume	<b>48433 m<sup>3</sup></b>
Suspended Solids	<b>3.02 ts</b>
Heavy Metals	<b>0.037 ts</b>
Chemical Oxygen Demand (COD)	<b>203.82 ts</b>

#### Water Performance 2007

Water is metered by United Utilities. A comparison of consumption levels for the period 2002 - 2007 is as follows:

The company performance on water consumption in 2007 was 10.62 m<sup>3</sup> of water was consumed per tonne of product produced. This was similar to the figure of 8.31 m<sup>3</sup> in 2006. The figures are influenced by product mix which change on an ongoing basis.

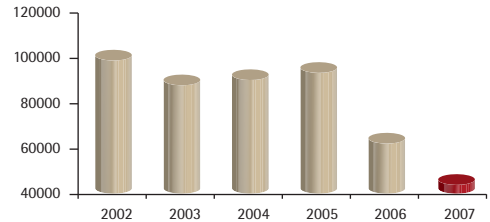
#### Water Performance m<sup>3</sup>

2002	2003	2004	2005	2006	2007
<b>167465</b>	<b>113130</b>	<b>98074</b>	<b>96686</b>	<b>77760</b>	<b>86885</b>

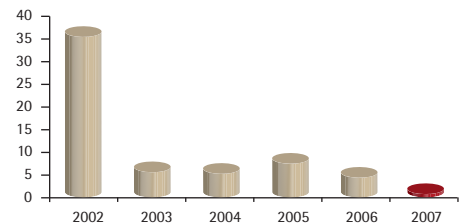
### 2007 Objectives and Targets for Water and Trade Effluent

The site is committed to using less potable water than it did during 2007. The Company aims to improve performance against the 2007 figure of 10.62 m<sup>3</sup> of water used per tonne of product manufactured. This will be carried out by conducting a water efficiency audit.

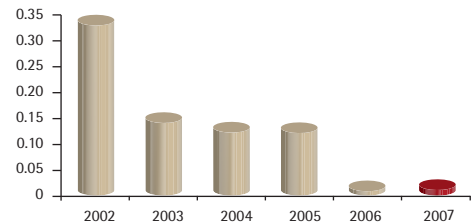
Effluent Volume Water Site Consumption (m<sup>3</sup>)



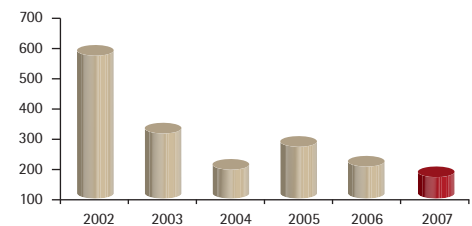
Suspended Solids (tonnes)



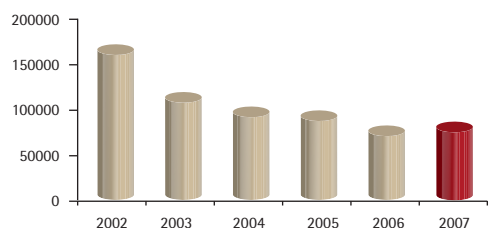
Heavy Metals (tonnes)



Chemical Oxygen Demand (COD) (tonnes)



Water Site Consumption (m<sup>3</sup>)





## 4.2 Energy Consumption

The main energy use of the site is related to the following activities:

Natural gas and light fuel oil are used to generate steam in the boiler house. Steam is used for manufacturing processes and for general heating

Electricity mostly to drive pumps and motors and for lighting

The site also uses light fuel oil for transportation purposes. This data has, in previous years, been included in the total energy use figures. However, from this statement onwards this will be excluded so that the statistics are compatible with the figures used for submission to the Chemical Industries Association Broking and Trading Agency (CIABATA) for subsequent submission to government.

In the Finance Bill 2000, the Chancellor introduced legislation designed to help the UK meet its targets for reducing greenhouse gas emissions, to promote energy efficiency and to stimulate demand for renewable sources of energy.

The Climate Change Levy became effective from 1st April 2001. The Company has a 'Climate Change Levy' agreement with Government to improve its energy efficiency. Through this agreement the company has committed to improve its energy efficiency ratio (Gigajoules used per tonne of product) when compared to 1998 levels. We are pleased to say that we achieved our targets for the milestone years of 2002, 2004 and 2006. The next milestone target is at the end of 2008 and subsequently the final milestone year of 2010. We will report on these in due course.

### Energy Performance 2007

The site used approximately 111,744 GJ (12.30 GJ per tonne of product) of energy during 2007 for operational activities. This is equivalent to around 5,530 tonnes of Carbon dioxide (CO<sub>2</sub>) released to the atmosphere from, for example, a power station.

The 2006 figures were 105,955 GJ equating to 5,243 tonnes of CO<sub>2</sub>.

The overall target for 2007 was 19.79 GJ per tonne of product produced. The result of 12.22 GJ per tonne of product was well within target.

The consumption of energy for production processes varies in accordance with the volume and mix of products being manufactured. Site management is aware of the cost efficiency, sustainability and environmental benefits of minimising energy consumption and has continued to improve performance.

The company energy management team has started work in areas such as steam efficiency, compressed air usage and lagging protection of relevant plant and equipment. This will also help the company to absorb the high increase in gas and electricity prices seen in the last few years.

### 2008 Objectives and Targets for Energy

The target for 2008 is 19.79 GJ per tonne of product. The site is committed to achieving a 10% improvement in its energy efficiency in 2008 compared to 2007. This will be carried out considering the energy requirements of new and existing equipment.

### 4.3 Air Emissions

Contract Chemicals processes are authorised by the Environment Agency under the Integrated Pollution Prevention and Control regulations (IPPC). The site has one distinct permit specifying the types of products manufactured, methods of plant operation and permissible emissions to the environment. In future years the company will move towards MCERT monitoring to improve in measurement techniques.

Contract Chemicals is required to report regularly to the Environment Agency. In order to provide a higher quality of information and to gain a greater understanding of the way in which the processes can give rise to atmospheric emissions, the Company invested heavily during previous years in the installation of continuous monitoring equipment for VOCs and other gases.

Volatile Organic Compounds (VOCs), mainly associated with the use of organic solvents, are one of the main releases from the processes. Emissions are minimised by the use of condensers linked to enclosed reaction vessels and by air scrubber units.

Some volatile organic compounds, such as amines and certain sulphur compounds, have unpleasant odours and low smell thresholds. Acid gases, such as hydrogen chloride and

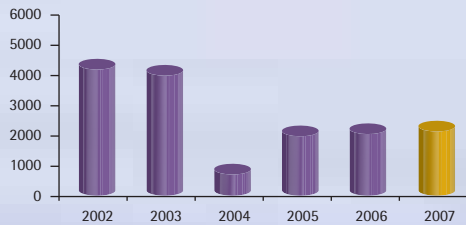
sulphur dioxide, are produced as by-products of certain reactions. Emissions to atmosphere are minimised by the use of aqueous scrubbing systems for cleaning the off gasses from process vessels. The liquors generated are collected for off site disposal or are recovered for use on other processes on site.

Ammonia is also a volatile reaction by-product, it is washed out of the gases evolved by the processes to control discharge to the atmosphere.

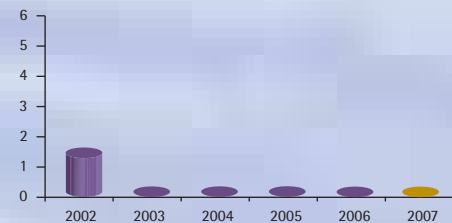
Air Emission quantities are derived from measurements of emission concentrations and discharge volume from exhaust stacks. The following emission figures are based upon reports to the Environment Agency. There were no verified environmental complaints during 2007.

## Air Releases 2007 (kilograms)

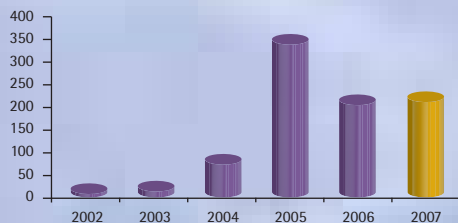
Volatile Organic Compounds (kgs) (as Carbon)



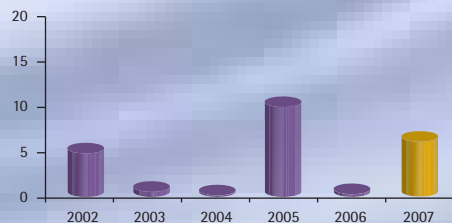
Amines (kgs)



Ammonia (kgs)



Bromine (kgs)



## Air Releases during 2007

Volatile Organic Compounds (as carbon)	2337.1 kgs
Amines	0 kgs
Ammonia	218.2 kgs
Bromine	7.1 kgs

## 2008 Objectives and Targets for Air Emissions

Contract Chemicals processes are covered by an Intergrated Pollution and Prevention Control permit. In 2008 the company will be progressing with improvements in monitoring techniques. In conjunction with existing equipment it will seek to improve on available analysis data by employing an independent MCERT accredited company to carry out specific monitoring. In addition the company will target zero verified environmental complaints associated with odours or emissions.

## 4.4 Wastes

Chemical reactions often produce by-products. These by-products can be of value in their own right or may be recyclable in the process.

Unwanted by-products are removed from the product during purification stages. They then enter the waste stream, either as a component of trade effluent, or as a waste which must be collected for off-site disposal. If these wastes are hazardous they must be disposed of as special wastes for specialist waste treatment.

The Company employs a specialist waste contractor to manage its waste and provide advice on disposal and treatment routes.

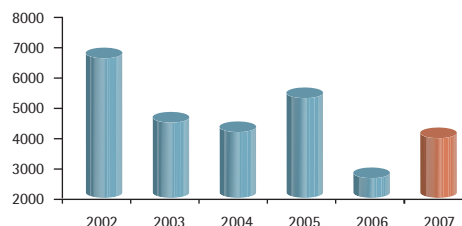
On site, wastes are segregated and managed according to their nature. Hazardous wastes awaiting disposal or treatment are stored in a specially designed and secure enclosure. The enclosure has hardstanding and a rainwater run-off collection system, enabling the water to be checked for contamination prior to discharge.

## Waste Disposal Performance 2007

The Company employs a specialist contractor to address waste disposal as a 'total waste management contract'. The Company regards waste disposal as a key part of sustainable development. The quantities for Special Waste reported below are derived from the records of waste shipments from the site.

During 2007 the company continued in-house treatment techniques to reduce the amount of Special Waste sent off site. This area will continue during 2008. In 2007 0.53 tonnes of waste were produced per tonne of product. This compared to 0.31 tonnes in 2006. In total 4,328 tonnes of special waste was disposed of in the year.

A comparison of Special Waste Disposal (tonnes) for the period 2002 - 2007



## 2008 Objectives and Targets for Waste Disposal

During 2008 the Company will aim to reduce waste production at source by reviewing forecasts of waste products and targeting variances above predicted waste volume. It will increase its treatment options and aim to better the 2007 performance figure of 0.53 tonnes of waste produced per tonne of product manufactured.

### 5.1 Environmental Aspects of Knowsley Site Activities


Some of the chemical raw materials and finished products handled on the Knowsley site are classified as hazardous and have the potential to cause harm both to human health and to the environment. It is therefore a management priority that the handling, storage and transport of such chemicals is carried out in a safe manner which minimises the risk of uncontrolled loss of containment at any stage. This is achieved by a wide variety of physical safeguards such as primary and secondary containment, careful segregation techniques and by training.

### 5.2 Emergency Planning and Training

Processes carried out at the site are subject initially to a comprehensive hazard review which considers the possible consequences of incidents such as power failures, fire, uncontrolled reactions, overheating etc. Storage, processing methods and safety precautions are then designed to minimise the risks involved. In 2008 the company will further its emergency response by providing additional specialist training to staff. As part of our 3 year obligation under the COMAH regulations the company conducted a full multi-agency exercise which tested all elements of our off-site emergency plan in November 2005. This involved the fire, ambulance and police services as well as the regulatory authorities such as the Health and Safety Executive and Environment Agency. The next full exercise is planned for 2008.

### 5.3 Chemical Process Engineering Design

Contract Chemicals places great emphasis on the planning and design of plant, equipment and processes. The philosophy of safe and environmentally acceptable design is a key consideration in the operation of the Company. All departments are encouraged to contribute ideas relating to the risk management of process and plant operations. The Company has developed a number of formalised systems which encompass this emphasis on safe plant operation. The Company utilises in-house resources as well as external consultants and professional bodies.



All new processes planned for production are evaluated to ascertain their potential environmental impact. This allows the Company to assess, plan and if necessary engineer suitable environmental controls prior to production. All documentation and systems relating to process and plant design are controlled and regularly audited.

#### **5.4 Noise and Nuisance**

Noise is managed as a health and safety issue on the Knowsley site. The production processes on the site are not inherently noisy. However, noise is generated in plant areas by activities such as maintenance, repair and cleaning and by raw material delivery and product shipment activities.

The Company carries out annual noise assessments as part of the noise management programme. Results demonstrate that noise is not a significant environmental impact.

Discharges of thermal energy, dust and other nuisances are not considered significant. However, these issues will continue to be reviewed as required.

#### **5.5 Indirect Environmental Impacts**

With regard to raw material procurement the company assesses key suppliers to determine their quality, safety and environmental performance. During 2007 the company has improved its ability to reduce the potential for environmental impact as a result of the direct inspection of all final products prior to transportation and delivery. With regard to delivery to customers the Company has registered with a scheme which provides expert technical advice as emergency backup in the event of, for example, a road traffic accident involving our chemicals.

In addition the Company has considered the impact of the packaging which surrounds the products delivered to customers. These materials include paper, metal, plastic and wood. In 2007 the Company made provisions for the recovery of at least 5% (14 tonnes) of the packaging material of which 61% (93 tonnes) will be recycled (with the exception of wood).

The board of Contract Chemicals is committed to achieve the highest possible standard in health and safety, quality and environmental management. This commitment is essential for the future of our business.

Our integrated manual and the related supporting procedures, instructions and records are designed to establish, document and maintain our management system.

It is the policy of Contract Chemicals to conform with the requirements of BS EN ISO 9001 quality management system, BS EN ISO 14001 environmental management system and OHSAS 18001 Occupational Health and Safety management specifications. The systems and instructions are therefore mandatory upon all Contract Chemicals personnel and will be capable of producing objective evidence of conformance through audit, assessment and regular review of compliance.

Additionally, as a member company of the Chemical Industries Association, we are wholly committed to external accreditation to the Association's "Responsible Care Initiative". As such, it is an integral part of our overall business policy to ensure that our activities are organised and managed to achieve an acceptably high level of protection for the health and safety of our employees, customers, neighbours, the public and the environment.

We will continually seek to improve the performance of our operations. We will monitor, control and where practicable progressively reduce emissions, waste output and energy use. As a company we are committed to the prevention of pollution from our operations. Our aim will be to reduce the risks to our employees and to continue the satisfaction of our customers.

We will continually assess our performance against objectives and targets. New investments in plant and processes will incorporate the best available environmental and safety management techniques, which are commercially viable. We will continue to work closely with the appropriate external authorities to meet all regulatory and legislative requirements.

In order to ensure the success of this important policy the necessary resources, both human and financial will be made available. In addition, as an IIP accredited company, there is an on-going commitment to training and awareness to ensure that responsibilities and duties for all employees are understood, implemented and maintained at all levels within the company.

We welcome participation from all in reviewing, maintaining and improving the policy and its supporting systems to ensure that these high standards are met and maintained. Our policy, objectives and criteria for the determination of significant environmental issues, are publicly available to all interested parties.

Signed



Dr Tony Bastock OBE, Group Managing Director



Stephen Ockleshaw

Quality, Safety and Environmental Manager

### **IPPC**

Integrated Pollution Prevention Control Regulations 2000 :  
A new environmental regulatory system that will replace IPC. It employs an integrated approach to control the environmental impacts of certain listed activities. It involves determination by the regulator ie. Environment Agency of the appropriate controls for those industries to protect the environment through a single permitting approach. Regular information on emissions will continue to be submitted to the regulatory body.

### **COD**

Chemical Oxygen Demand: a measure of the level of organic material dissolved in water. The higher the COD value, the higher the level of organic content.

### **pH**

A measure of the level of acidity (low pH) or alkalinity (high pH) of aqueous solutions.

### **VOCs**

Volatile Organic Compounds: refers to a wide range of organic substances, usually solvents, with low boiling points. VOCs are important air pollutants and can affect the quality of the air both directly and indirectly.

### **Gigajoules (GJ)**

100,000,000 times the heat generated by a current of one ampere flowing for one second against a resistance of one ohm.

### **IMS**

Integrated Management System: combines quality, environmental, occupational health and safety as part of the overall business practices.

### **Responsible Care**

A CIA initiative promoted throughout the chemical industry. For further information contact the CIA or refer to the Information and Communication section in this statement.

### **IIP**

Investors in People: an externally verified system for identifying competency needs and providing the appropriate training.

### **Sustainable Development**

The adoption of innovative business solutions that help satisfy society's needs whilst; optimising use of resources; ensuring all reasonable steps have been taken to prevent harm to human health and the environment; demonstrating good practice in ethical behaviour; adopting the highest standards of corporate governance and accountability. A Chemical Industries Association initiative promoted through the chemical industry.

### **REACH**

REACH is an acronym for Registration, Evaluation and Authorisation of CHemicals. The REACH proposal requires industry to register all existing and future new chemicals with a new European Chemicals Agency. The new legislation will come into force 2007/8 and its objective is to ensure a high level of protection for human health and the environment.

For further information on the chemical industry and Responsible Care  
CIA – Chemical Industries Association  
Kings Buildings, Smith Square,  
London SW1P 3JJ. 020 7834 3399  
[www.cia.org.uk](http://www.cia.org.uk)

For further information on environmental issues including air, water, waste and packaging.  
Environment Agency  
[www.Environment-Agency.gov.uk](http://www.Environment-Agency.gov.uk)

For further information on energy efficiency in the chemical industry  
CIABATA – Chemical Industries Association  
Broking and Trading Agency  
Kings Buildings, Smith Square, London SW1P 3JJ. 020 7834 3399 [www.ciabata.org.uk](http://www.ciabata.org.uk)

For further information on any topics covered in this statement, or for additional copies of the statement, please contact Stephen Ockleshaw at the address below. Anyone wishing to visit the site may do so providing prior arrangements are made.

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