

From: [REDACTED]
To: [REDACTED]
Subject: RE: AGC update following site visit 04/01/2023
Date: 03 February 2023 09:33:00
Attachments: [image001.png](#)
[image002.png](#)

Hello [REDACTED]

Thank you for your letter of 5 January 2023, I am sorry for the late reply. If you want something quickly, feel free to follow up with a call, I welcome this.

1. Proposal 1 is to trial a water filtration system. I agree to your proposal for a period up to 12 months, subject to extension in writing. Please let me know when the system is in operation, I may want to come to see the plant. We would welcome a summary report on the effectiveness of the unit in due course.
2. Proposal 2 is to allow a second carbon unit for ACC-2000 (tridecafluorohexane). This is a process improvement. In principle we will agree to this. However, you will have to provide us with an updated operating technique. I would the proposal to include some one off reporting to demonstrate the additional abatement gained.

In both cases, we will normally charge for the time we spend evaluating and agreeing changes under the time and materials charging scheme. However, if I can legitimately incorporate the additions into an inspection, then I will not apply charges. Please let me know when the filtration system is operational so that I can see it. Similarly, when you propose the updated operational technique for ACC-2000, I will see if I can consider this as part of an inspection and review of process, rather than make an additional charge.

I will follow this email up with a CAR form as a public register document.

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 20 January 2023 13:14
To: [REDACTED]
[REDACTED]
Cc: [REDACTED]
Subject: AGC update following site visit 04/01/2023

Hi [REDACTED]

Update on actions below.

1. Part A's & Part B's
 - a. Waste Acid Stack R22 breach: Part B submitted 06/01/2023
 - b. Low Boiler Stack R22 and R125 breach: Part B updated 20/01/2023 freezing impulse lines impacting steam flow and photo included.
 - c. Co annual emission breach: Part A submitted 06/01/2023, Part B to complete.
2. Safety data sheet for AC-2000 (C6H). Followed up with our team and expect to be able to

send this over to you by the end of the month.

3. Confirmed no action required at this stage on Medium Combustion Plant Directive (MCPD)
4. Blocked drain and spilled filter cake material from skips raised resolved – please see photos attached.
5. Please can you let us know when to expect a response to the letter from 05/01/2023 RE: Changes to Operating Techniques - letter attached.

Kind regards,

[REDACTED]



[REDACTED]

AGC Chemicals Europe, Ltd.

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From: [REDACTED]

Sent: 06 January 2023 13:42

To: [REDACTED]

[REDACTED]

Cc: [REDACTED]

Subject: AGC update following site visit 04/01/2023

Hi [REDACTED]

Good to meet you both earlier this week. I'm away next week but wanted to give you an update on some of the actions we discussed.

I'll follow up on my return 16/01/2023, but if you need anything in the interim please reach out to [REDACTED]

1. Part A's & Part B's – I have sent these on separate emails related to these breaches (hopefully this is easiest for you, but please let me know if otherwise)
 1. Waste Acid Stack R22 breach (Part A submitted 23/12/2022, Part B submitted 06/01/2023) We have been trying to locate the previous work done on the level of uncertainty associated with the analysis of stack data, we have found some information from around October 2015

mentioning this (see attached) do you or perhaps [REDACTED] have anything on this, either way we'll look to do some work to update our level of uncertainty and feedback to you.

2. Low Boiler Stack R22 and R125 breach (Part A submitted 19/12/2022 and updated on 21/12/2022 to include R125, Part B submitted 06/01/2023). On site we were discussing freezing steam lines, but on further discussions with the operations team this was actually instrument air lines impacting steam flow, this is covered in the Part B.
3. (NEW) CO annual emission breach (Part A submitted 06/01/2023)
2. Send safety data sheet for AC-2000 (C6H). Our CSR team are currently making updates to be compliant with new EU Regulations. I expect to be able to send this over to you w/c 16 Jan.
3. Query on Medium Combustion Plant Directive (MCPD) sent 05/01/2023 to confirm if any action is required from AGC.
4. Blocked drain and spilled filter cake material from skips raised with our maintenance team to resolve.
5. Changes to operating techniques discussed 04/01/2023 for emissions improvement activities planned at AGC - letter attached.
6. Slides from 04/01/2023 attached.

If you have any questions/need anything else – please let me know.

Kind regards,

[REDACTED]