

[REDACTED]

From: [REDACTED]
Sent: 08 December 2022 09:14
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Part A Query

Hi [REDACTED],

Thank you for your response.

Root cause investigation is ongoing. On initial investigation it is thought that the burst disc failed due to a fatigue issue. Once the full investigation is completed, we will share with you the investigation report.

We will include the emissions from this TFE/ethylene release on the PI and not complete the Part A.

Kind regards,
[REDACTED]



[REDACTED]
AGC Chemicals Europe, Ltd.
[REDACTED]

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From: [REDACTED]
Sent: 07 December 2022 10:23
To: [REDACTED]
Subject: RE: Part A Query

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Hello [REDACTED]

As you say, the burst disk is intended to operate as an emergency measure to protect the plant and safety. Did you carry out a root cause investigation? If so can I have a copy.

Yes, you will need to incorporate all the emissions into the PI.

From: [REDACTED]
Sent: 06 December 2022 16:36
To: [REDACTED]
Subject: Part A Query

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Hi [REDACTED]

A bit unsure if this requires a Part A, but would appreciate your thoughts, we will include the TFE released in the Pollution Inventory Submissions in February.

On 3rd December ETFE operators identified abnormalities in the levels of TFE being recycled within the plant. The investigation established that a relief stream (burst disc) had a partial failure, once identified the ETFE plant stopped operation on the affected stream and the system was isolated preventing further release.

This has resulted in approx. 995kg TFE and 57kg Ethylene being released between approx. 00.00 2nd December and 22:28 on 3rd December via the relief stream. The relief stream is a permitted release point in the permit A9, there are no monitoring requirements or limits set for these emission points, but we have previously reported emissions of TFE from relief streams.

Would it be possible to confirm if you require this event to be incorporated only in the annual pollution inventory or reporting via a Part A report?

Kind regards,
[REDACTED]



[REDACTED]
AGC Chemicals Europe, Ltd.
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