

[REDACTED]

From: [REDACTED]
Sent: 26 September 2023 16:31
To: [REDACTED]
Subject: RE: AGCCE Regulation 61 Final Draft discussion with EA
Attachments: W2 and W3 sample locations.docx; Regulation 61 programme.pdf
Follow Up Flag: Follow up
Flag Status: Completed

Hi [REDACTED], all,

As discussed, please see attached and notes below.

- 1.1 Screening W2 and W3 locations not defined in permit (no monitoring at W2, W3 just screening).
[REDACTED]
 - See attached where it would be possible to access W2 and W3 locations for screening (4 spot samples total) I assume the downstream locations would be preferable? Locations to be agreed via Regulation 61 screening procedures for review (1.1) (Reg 61 to be updated to reflect this)
- 1.2 Background chemical data, e.g. tidal/non-tidal... [REDACTED] to talk though this. No TOF analysis identified for background chemical quality data. Why monitor all Annex I if not screened present in AGCCE W1 effluent?
 - [REDACTED] confirmed TOF analysis and only screened in Annex I would be required for background chemical quality data (Reg 61 to be updated to reflect this)
 - Location to be agreed via Reg 61, likely AGC will monitor from Shard Bridge at high tide, assume the plume does not extend this far. Discussed that if there is uncertainty in the data maximum recorded values would be used.
- 1.2, 2.2 Note, installation of AGCCE abatement equipment during/prior to monitoring (impacts to monitoring of W1 and A7).
 - Water emissions from W1 likely to get approx. 12 No. samples pre/post installation of additional abatement for effluent improvement
 - Air emissions from A7 likely that analysis would be completed post installation of additional abatement
 - Dates are identified on programme shared.
- 1.3, 2.3, and 3 Mass release method approval isn't identified in Regulation 61, assume it will be need? Assume AGCCE will report mass balance for 2023 -2024, potential to complete 2022-2023 if existing mass balance method is acceptable and data is available.
 - Reg 61 to be updated to include approval, EA likely to approve existing method already in place
 - Mass balance report annually – added note to our programme, this is likely to be releases to you by March 2024, March 2025 or March 2026
- 3 Other PFAS releases: AGCCE request definition of 'aware', do you mean '*Have the company obtained measurement of any other PFAS, as defined by the...*'
 - A large number of PFAS could be theoretically possible, Reg 61 to be updated to reflect what AGC are aware of through existing monitoring.
- Feasibility for 3 Other PFAS releases: For substances listed in Annex I, II and III, provide details of annual mass releases via waste and product for 2 consecutive years.

- Where Annex I PFAS are not directly attributed to fluoropolymer manufacture mass balance not required, this will limit this action to 10 No. Annex I PFAS not in use but potential to generate from PTFE micropowder manufacture during thermal degradation and irradiation.
- Milestone dates/deadlines, outline programme to be shared. March 2026 for all data/information (including staggered release of information/data). Opportunity to improve on this date (see comment above on mass balance) but expect it to be at least 24 months.
 - Please see attached.
 - Quarterly check ins and release of monitoring data where available (without interpretation) – we can add these to the programme and schedule in once the Regulation 61 notice is submitted.

Kind regards,



AGC Chemicals Europe, Ltd.

www.agcce.com



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from @agcce.com to @agc.com

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-----Original Appointment-----

From: [REDACTED]

Sent: Monday, September 11, 2023 9:36 AM

To: [REDACTED]

Subject: AGCCE Regulation 61 Final Draft discussion with EA

When: 26 September 2023 14:00-15:30 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

Where: YH-Training Room

Hi [REDACTED]

Meeting to finalise AGCCE Regulation 61 to be issued w/c 2nd October (booked 90 mins but this may not be required).

Discussion points:

- 1.1 Screening W2 and W3 locations not defined in permit, [REDACTED] to share where AGCCE could access for sampling as part of screening method proposals (no monitoring at W2, W3 just screening).

- 1.2 Background chemical data, e.g. tidal/non-tidal... [REDACTED] to talk through this. No TOF analysis identified for background chemical quality data. Why monitor all Annex I if not screened present in AGCCE W1 effluent?
- 1.2, 2.2 Note, installation of AGCCE abatement equipment during/prior to monitoring (impacts to monitoring of W1 and A7).
- 1.3, 2.3, and 3 Mass release method approval isn't identified in Regulation 61, assume it will be need? Assume AGCCE will report mass balance for 2023 -2024, potential to complete 2022-2023 if existing mass balance method is acceptable and data is available.
- 3 Other PFAS releases: AGCCE request definition of 'aware', do you mean '*Have the company obtained measurement of any other PFAS, as defined by the....*'
- Feasibility for 3 Other PFAS releases: For substances listed in Annex I, II and III, provide details of annual mass releases via waste and product for 2 consecutive years.
- Milestone dates/deadlines, outline programme to be shared. March 2026 for all data/information (including staggered release of information/data). Opportunity to improve on this date (see comment above on mass balance) but expect it to be at least 24 months.

Please forward this invite to your other EA colleagues as needed.

Kind regards,
[REDACTED]

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