

## **Part B Response**

Part B Response to incident reported on: 20/07/2023

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| <p>Any more accurate information on the matters for notification under Part A</p> | <p>On 07/07/2023 an engineer attended to install new Gas chromatography–mass spectrometry (GC-MS) instruments and update software on existing Gas chromatography (GC) and GC-MS instruments. During this planned work there were no available GC and GC-MS instruments to undertake emission monitoring during the week ending 16/07/2023.</p> <p>Note, A1 and A2 emissions monitoring results were already obtained 03-06/07/2023 hence compliant with weekly permit monitoring requirements for week ending 09/07/2023.</p> <p>Due to unexpected issues during the software updates and installing new GC-MS equipment A1 and A2 emissions monitoring was not undertaken for the week ending 16/07/2023.</p> <p>The task of updating software on existing instruments which commenced 07/07/2023 and took longer than expected due to IT settings hindering the progress. The engineer returned on Tuesday 11/07/2023 (note, the engineer was unavailable on 10/07/23). Upon installation of new GC-MS and software updates being completed Tuesday evening, the engineer informed AGC that the methods on the existing equipment could not be run due to the significant changes from the software update. This was not anticipated by the QC Lab Manager and meant the methods had to be re-written in the updated software.</p> <p>The methods were re-written across Wednesday and Thursday (12-13/07/2023) for GC-MS instruments calibrated for all parameters except for CO. The GC method for CO was updated and calibration completed on the GC by Tuesday morning 18/07/2023. Due to a breakdown in communication on the status of GC-MS instruments stacks for A1 and A2 were not completed on 14/07/2023.</p> <p>A1 and A2 stacks were successfully run on 17/07/2023 with exception of CO. On 18/07/2023 A1 and A2 stacks were successfully run including CO.</p> <p>There was no abnormal operation of the plant w/e 16/07/2023. Average weekly emission from 01/01/2023 to week ending 09/10/2023 identified in the Part A submission has been used for the missed air emission monitoring for A1 and A2 for w/e 16/07/2023.</p> |
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| Measures taken, or intended to be taken to prevent a recurrence of the incident                                                                        | <p>For any future software updates (note, these typically occur every 8-10 years) or annual service work GC and GC-MS monitoring equipment will be confirmed operational prior to moving on to the next piece of equipment to ensure a backup is available for daily<sup>1</sup> monitoring.</p> <p>Improved communication on status of environmental monitoring equipment from QC Lab Manager to Environmental team. Environmental team to be informed directly prior to and during any work to the GC and GC-MS used for daily<sup>1</sup> air emission monitoring. QC Lab Manager to confirm directly when monitoring equipment is available for analysis.</p> <p>(1) Typically 'daily' monitoring Monday – Friday is undertaken for A1 and A2 emission points, the permit requirement is weekly.</p> |
| Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission | n/a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| The dates of any unauthorised emissions from the installation in the preceding 24 months                                                               | <p>06/01/2023: Breach of annual CO limit (Part B due investigation ongoing)</p> <p>22/02/2023: Missed 24-hour effluent sample on 17/02/2023 from W1 Discharge to River Wyre</p> <p>01/04/2023: Process gas release from SP2</p> <p>29/05/2023: Breach of suspended solids limit (CAR: EA confirmed n/a)</p> <p>02/06/2023: Breach of suspended solids limit (CAR BU5453IY/0468332)</p> <p>16/07/2023: Missed air emissions monitoring from A1 Low Boiler Stack and A2 Waste Acid Stack</p> <p>19/07/2023: Discharge to Royles Brook</p>                                                                                                                                                                                                                                                                  |

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| Name*     |  |
| Post      |  |
| Signature |  |
| Date      | 03/08/2023                                                                          |

\*authorised to sign on behalf of AGC Chemicals Europe