

[REDACTED]

From: [REDACTED]
Sent: 24 November 2023 15:05
To: [REDACTED]
Subject: Regulation 61 AGCCE
Attachments: EMT-SSP-05959 AGC Chemicals Europe Ltd (May 2023).pdf

Hi [REDACTED]

We just wanted to run a couple of points by you prior to our meeting in December which will help us progress/help direct our meeting.

1. Would it be possible to amend the meeting time to 09:00 on the Monday 11th or 10:00 on Wednesday 13th December? (we have a clash with an external audit).
2. For the air emissions monitoring methodology for screening/monitoring – would the Site-Specific Protocol be sufficient to cover off the requirement for the methodology (please see example attached)? This identifies all the process information, sampling location details, Standard Reference Methods to be used and analysis technique. On discussion with external air monitoring team the internal technical procedures could be made available by the EA/AGCCE (i.e., they could bring to site) but could not be submitted as part of the Regulation 61 request. Please can you confirm this is sufficient.
3. For A7 we are proposing 1x 6-hour monitoring sample for the screening (PFBA & PFHxA) and would like to progress with this – please could you confirm this is acceptable and we'll progress with developing the methodology to share with you.
4. Following discussion with air emissions monitoring team it will not be possible to undertake 24hr samples.
 - a. For A5 we propose to take 2x4 hr samples over 4 days throughout 2024 – this follows monitoring we have been previously undertaken for EEA-NH4 & PFOA and data could also be submitted? Methodology is included in the attached.
 - b. For A4 we'll review but have previously taken 10x1hr samples for PFOA and HF (HF from Permit requirement) and over the full 10 hour oven cycle. Methodology is included in the attached, however this doesn't include EEA-NH4, this would likely be 1x10hr sample over the full oven cycle.
 - c. For A7 we are planning on installing an online GC so 24hr samples could be possible (for C6H at least). **As mentioned previously we are planning on** combining commissioning of this project and validation with screening and if feasible looking to include PFBE and potentially PFBA & PFHxA on the online GC.
5. We recently attended a workshop by AECOM where they mentioned they have written an internal guidance document for the EA on PFAS and had undertaken some catchment sampling for PFAS. I believe these documents would be useful context for use and for writing sampling methodology, particularly for our background river samples. Please could you share these documents with us, or would you prefer us to request via national.requests@environment-agency.gov.uk? [REDACTED] highlighted this to me when I requested a document as part of feedback on document request prior to release.
6. We have submitted a enhance pre application advice request to discuss our permit variation (primarily for effluent improvement prior to emission point W1 and secondary carbon adsorption unit (operating in series to existing unit) prior to emission point A7) it would be useful to involve your team in these discussions particularly around the approach to permit limits and risk assessment requirements alongside the Regulation 61 notice as updated surface water risk screening and air emissions risk assessments are a requirement of the Regulation 61 notice.

Have a good weekend.

Kind regards,



AGC Chemicals Europe, Ltd.



www.agcce.com



Messe München
Stand 404 / Hall B2
14 - 17 November 2023



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