

[REDACTED]

From: [REDACTED]
Sent: 17 March 2023 16:21
To: [REDACTED]
Subject: RE: queries regards your pollution inventory report

Hi [REDACTED],

That's great- thank you for confirming.

Yes, that's correct for the Mercury calculation for pollution inventory. Though not all results for 2022 at detection limit, some were **below the detection limit**. I copied the results from 2021 and 2022 in to a table at the bottom of my email.

Many thanks,
[REDACTED]



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

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Registered Office: York House, Hillhouse International, Fleetwood Road North, Thornton-Cleveleys, Lancashire, FY5 4QD VAT: 732803742.

From: [REDACTED]
Sent: Friday, March 17, 2023 4:14 PM
To: [REDACTED]
Subject: RE: queries regards your pollution inventory report

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Thanks [REDACTED]

Regards the pollution inventory return, I have cleared the flags, adding a comment that we have discussed the values submitted – there will be further rounds of QC checks, so I might need to get back to you, but for now this is resolved.

Regards the change in Mercury results – do I understand it right that all the lab results for this year that are not below the detection limit are right at the detection limit, and then you multiply the concentration by the monthly effluent volume?

Kind Regards
[REDACTED]

From: [REDACTED]

Sent: 17 March 2023 14:40

To: [REDACTED]

Subject: RE: queries regards your pollution inventory report

Hi [REDACTED]

Thank you for the reminder and apologies for the delay – comments below for the pollution inventory data and have resubmitted.

Waste: As discussed, happy with values entered. Waste data obtained from our waste transfer notes.

Air: Increased emissions of Hydrofluorocarbons (HFCs) and Perfluorocarbons (PFCs) due to the Thermal Treatment Plant being offline during 2022 and variation in process gas composition due to production demands and raw material sourcing.

Water: Mercury emission of 1.35kg is based on mercury concentration from our monthly composite effluent sample (discharge to river W1) and discharge volume to river.

It is possible that this increase in 2022 is from contamination on wider site as there has been no change in process/material used which would lead to an increase emission of mercury.

Caustic soda (sodium hydroxide) used on site is produced using a non-mercury process with a product specification of Mercury <0.001 mg/kg.

When reviewing previous calculations for environment agency data submissions, the maximum possible release of Mercury is based on the usage of sodium hydroxide. This is consistent with Table S3.5 of our permit which in Note 3 identifies that the annual limit of Mercury is obtained using a mass balance calculation.

In 2022 our usage was 240412 kg and with a worst-case Mercury concentration of 0.001 mg/kg gives 0 kg Mercury emission. This is what has been reported in our Annual data submission.

We do not believe this is a permit breach as the Mercury isn't coming from our process. [REDACTED] please can you give me a call to discuss if we need to submit a Part A for this?

We have included the results from the lab over the past 2 years below and will follow up with the lab as we typically get 'less than detect' results but last year we received an increased number of results at the level of detection.

Kind regards,
[REDACTED]

Table S3.3 Point Source emissions to water (other than sewer) – emission limits and monitoring requirements				
Emission point ref. & location Note 5	Parameter	Source	Limit (incl. unit)	Repe
W1 Discharge to the River Wyre	Mercury (trace in sodium hydroxide)	On-site effluent treatment plant: Neutralised waste acids, process effluent, effluent from the thermal treatment plant scrubber and surface water from main plant areas	Limit applicable to the effluent from the thermal treatment plant scrubber outlet, defined as W4 in Table S3.4 of this permit	F pl Si No

Table S3.5 Annual Limits		
Substance	Medium	Limit (including unit) Note 1
Carbon monoxide (A1)	Air	25 tonnes in a year
Tetrafluoroethylene (A1)	Air	7 tonnes in a year Note 2
Tetrafluoroethylene (A2)	Air	5 tonnes in a year Note 2
Trifluoroethylene (A1)	Air	5 tonnes in a year Note 2
Hexafluoropropylene (A2)	Air	5 tonnes in a year Note 2
Hydrogen fluoride (A4)	Air	250 kg in a year
Mercury (trace in sodium hydroxide)	Water	1 kg in a year Note 3
Total Organic Carbon (A14)	Air	No limit applies Note 4

Note 1: To be calculated by multiplying the average emissions of the substance per hour by the number of operating hours.

Note 2: Class A VOCs to be expressed as individual VOCs and Class B VOCs to be expressed as carbon.

Note 3: Compliance based on mass balance calculation defined in Schedule 7 of this permit.

Note 4: Tonnes in a year to be calculated by multiplying the average emissions of the substance per hour by the number of operating hours.

Date	Mercury Monthly average from monthly composite sample mg/l	Mercury (kg)
Jan-21	<0.01	-
Feb-21	<0.01	-

Mar-21	<0.01	-
Apr-21	<0.01	-
May-21	<0.01	-
Jun-21	<0.01	-
Jul-21	0.02	0.46704
Aug-21	<0.01	-
Sep-21	<0.01	-
Oct-21	<0.01	-
Nov-21	<0.01	-
Dec-21	<0.01	-
Jan-22	<0.01	-
Feb-22	<0.01	-
Mar-22	<0.01	-
Apr-22	<0.01	-
May-22	<0.01	-
Jun-22	0.01	0.2536
Jul-22	0.01	0.24673
Aug-22	0.01	0.23182
Sep-22	0.01	0.17969
Oct-22	0.01	0.22097
Nov-22	<0.01	-
Dec-22	0.01	0.21652



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Registered Office: York House, Hillhouse International, Fleetwood Road North, Thornton-Cleveleys, Lancashire, FY5 4QD VAT: 732803742.

From: [REDACTED]

Sent: Wednesday, March 15, 2023 8:31 AM

To: [REDACTED]

Subject: FW: queries regards your pollution inventory report

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Hi [REDACTED]

This is a reminder to please add comments to your pollution inventory report, see my original e-mail below. There are centrally set deadlines on this – I don't have much time to verify them after the submission deadline, which was 28th February.

As before, if you need help, please feel free to phone me. If you are having problems updating the report directly, you can send me the information and I can copy it in.

Kind Regards
[REDACTED]

From: [REDACTED]
Sent: 01 March 2023 10:06
To: [REDACTED]
Subject: queries regards your pollution inventory report

Hi [REDACTED]

Thanks for submitting your pollution inventory report. There are quite a high number of queries raised on this. I have replaced all values which are below the reporting limit ('check 5') with BRT, so these are resolved, but due to the significant changes in quantities to previous years, there are still 22 values flagged.

I attach the history report for your site for your information, and I have re-set your report on PIEDC to 'incomplete'. Could you please have a look at your submissions or the attached history report and check all values that are flagged for 2022 (check 1 to check 4)? If the values have more than doubled or halved since 2021, could you please put a short comment in the 'Qualification Notes', giving the reason for the change?

If you need any help, please feel free to phone me.

Kind Regards
[REDACTED]

[REDACTED]

[REDACTED]



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