



**From:** [Voice, Elizabeth](#)  
**To:** [Bradford, Julie](#)  
**Subject:** FW: eni LBOC Point of Ayr Shutdown  
**Date:** 29 May 2014 13:05:13

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**From:** Jones Catherine [mailto:Catherine.Jones@eni.com]  
**Sent:** 29 May 2014 11:00  
**To:** Voice, Elizabeth  
**Cc:** Oakes, Ian; Perkins Roger; Sankoomar Dhillip  
**Subject:** RE: eni LBOC Point of Ayr Shutdown

	INITIALS	DATE
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Beth

Many thanks for your response authorising the operation of the Point of Ayr Gas Terminal without the Tail Gas Unit for one week prior to, and one week after, our forthcoming shutdown period.

The shutdown is now anticipated to commence no earlier than 26<sup>th</sup> June for a period of 3 weeks, slightly later than we originally discussed with you. I have delayed sending this reply to you until I was able to indicate a realistic start date for the shutdown.

With respect to your request for the reasoning behind this request, here is a summary of what we discussed with you on 7<sup>th</sup> May:

1. The usual frequency of our shutdowns is biennial, however they are occurring in both 2013 and 2014, in preparation for the offshore tie-in of oil production from a new third-party production facility offshore.
2. The inspection of the POA Thermal Oxidiser Stack, which is occurring during the forthcoming shutdown, is a required piece of work, and not an opportunistic one.
3. It is likely that this TOX stack inspection will take between 6 and 10 days, but the exact duration can't be specified until the inspection itself has commenced and any issues are understood.
4. As usual, third party contractors are being utilised in addition to our own manpower resources, to ensure that the site is ready for the shutdown to commence, and to minimise the outage period. However as discussed, our own operators are essential for the safe completion of many tasks, because of their familiarity with the equipment, plant and procedures.
5. The Tail Gas Unit is the most reactive part of the plant, and hence needs particular attention during start-up and shut-down, to minimise risk. Therefore taking the TGU offline before the main outage allows focus on this risky process, minimising the risk of catalyst fire/damage. Similarly, on restarting the TGU, damage to the catalyst will only be identified via monitoring emissions against ELVs, therefore bringing the TGU back up after the rest of the plant again allows this potential to be closely monitored.
6. We will of course ensure that perimeter odour checks occur regularly, during the periods when the plant is operating without the TGU, additionally we will continue to monitor TOX emissions for NOX and SO2.

Please let me know if anything else is required, I will ensure that you are kept informed should

anything else change as our shutdown plans progress.

Regards

Cath

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**From:** Voice, Elizabeth [<mailto:Elizabeth.Voice@cyfoethnaturiolcymru.gov.uk>]  
**Sent:** 08 May 2014 13:21  
**To:** Jones Catherine  
**Cc:** Oakes, Ian  
**Subject:**

Cath

Please find attached a letter authorizing the operation of site without the Tail Gas Unit for one week before shutdown and one week after shutdown.

I can confirm that the report required every 4 years (discussed in the meeting yesterday) should be completed as eni (formerly BHP Billiton Petroleum Ltd) as the permit is now in this name.

I am on leave until May 28th, so please liaise with Ian Oakes if required during my absence.

Regards

Beth

Beth Voice

Regulatory Officer (PPC), Natural Resources Wales  
Swyddog Rheoliadol (RhDP), Cyfoeth Naturiol Cymru

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*Our purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.*

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