

**The Environmental Permitting (England and Wales)
Regulations 2016**

**UNIT 1 2023 FUGITIVE EMISSIONS REVIEW
FOR CONVATEC LIMITED**

**PPC Permit number NP3433BC,
Variation Notice number PP3433LP,
Variation Notice number EA/EPR/NP3433BC/V003,
Variation Notice number EPR/NP3433BC/V004,
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Fugitive Emissions Review 2023

1.0 Summary

During 2023 the environmental performance improvements made in 2018 (RTO) are still being realised through the completion of annual monitoring. In addition, in April 2023, in collaboration with Original Equipment Manufacturer, the site reduced the RTO burner size, resulting in an average RTO gas consumption reduction of 16.7%, without impacting the abatement effectiveness. Given the challenge posed by achieving net zero carbon emissions, the company sought to explore the opportunity to balance the environmental impact of the low release of unabated VOC vs the burning of natural gas to abate such VOC; in early 2023, this concept was considered and deemed unsuitable due to the higher GWP of unabated VOC. The site has not received any odour complaints and indeed no general complaints were received during 2023. In terms of fugitive emissions recorded; the table below explains the possible emissions known to site (outside of permitted conditions) and a review of such for 2023.

2.0 Fugitive Emission Review

Fugitive Emission	2023 Review
Emergency Vents	In 2023 there were no emergency vent activations, meaning that no fugitive emissions were released via this mechanism within the process. The RTO has a function to switch into bypass mode in various emergency / abnormal scenarios i.e., equipment failure, high temperature, high vibration, high pressure, low compressed air, high levels of explosive gas / vapours, low flow, or an E-Stop being pressed. Through 2023 the RTO went into temporary bypass on 22 occasions, mainly due to spurious instrument trips, adverse weather and accidental emergency stop activations. This would lead to an amount of fugitive VOC emissions; however, this feature is essential to ensure the safety of the operation. Given the situations which cause the bypass feature to activate, processes are immediately and automatically shut down for safety, meaning the source of VOC emission is stopped and therefore only a very small quantity of fugitive VOC is released for a short period of time.
Process Vents	There were no process vent releases recorded in 2023, meaning no fugitive VOC emissions identified via this mechanism.
Bund Breaches	During 2023 there were no recorded bund breaches and so it is determined that fugitive emissions to water or ground via this mechanism have not occurred. Additionally, no loss of primary

	containment into bunds was recorded therefore no fugitive emissions to air noted via this mechanism.
Accidental Release (Spills)	During 2023 there have been no accidental releases to ground / water through spills. Currently the site has multiple spill team members, across all shifts, all of whom will undergo refresher training in 2024. Site makes use of an underground diverter tank for IDA and effluent offload, as well as two envirovalve systems, one penstock system and well-maintained spill skits. Raw materials are not manually handled outside any buildings, only in the warehouse and the clean rooms. Materials are transported to the warehouse in bulk on pallets that are shrink wrapped together to prevent a spillage. During 2023, the two envirovalve systems were upgraded.
Hazardous Waste	During 2023 all hazardous waste has been stored appropriately in lidded / closed containers to prevent any rainwater from mixing with any remaining substance, as well as to prevent any vapours / solid particulate which may build up, entering the atmosphere. Through 2023, reduction in bulk cleaning effluent waste is still being realised. All bulk liquids are stored in tanks / IBCs within bunded areas. All empty IBCs are capped to prevent drips of substances. During early 2023 the SMCA handling project had to be temporarily withdrawn due to processing difficulties, this meant the contaminated bag waste returned for a brief period of 4 months. By December 2023 the original handling method was reinstated; resulting in the waste stream being eliminated. That said, no fugitive emissions would be expected from this waste stream due to storage and handling methods.