

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

**UNIT 1 2024 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 2024

1.0 Summary

During 2024 the environmental performance improvements made in 2018 (RTO) are still being realised through the completion of annual monitoring. The site has not received any odour complaints and indeed no general complaints were received during 2024. 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 2024.

2.0 Fugitive Emission Review

Fugitive Emission	2024 Review
Emergency Vents	In 2024 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 2024 the RTO went into temporary bypass on 11 occasions, mainly due to spurious instrument trips and adverse weather; this figure is around half that of 2023. The bypass event 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 2024, meaning no fugitive VOC emissions identified via this mechanism.
Bund Breaches	During 2024 there were no recorded bund breaches and so it is determined that fugitive emissions to water or ground via this mechanism have not occurred. Effluent tank 1 (contained within the unit 1 large bund) was identified as having a minor leak during inspection and was repaired expediently. Given the composition of process effluent and the significance of the leak (quantity estimated less than one litre), the potential for fugitive emissions is minimal.

Accidental Release (Spills)	<p>During 2024 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 underwent 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.</p> <p>The two envirovalve systems were upgraded in 2023 and maintained / serviced in 2024 by a specialist third party contractor.</p>
Hazardous Waste	<p>During 2024 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 2024, the 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.</p>