

Permitting Support centre
Environmental Permitting Team
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Sheffield
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Our Ref
KB/PSC/01

Tel (Direct)
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Date
12th May 2010

Dear Sir

Subject: A request for a priority determination of a variation to Permit number BW9999IG / KP3735SC - Case reference number WP3138TR, EPR – EA/EPR/BW9999IG/V004

Proposed change: To replace the existing reactor on Formalin Plant 1 with the installation of a new Formalin reactor and associated control systems

Justification

This letter is written in support of our request for a variation to the above permit. We have shared our plans with Julia Frost our local EA inspector and on the basis of our discussions she is of the opinion that the permit variation is a Minor Technical Variation, with minimal changes to the conditions contained within the permit. There are a number of factors involved in this project that require us to request a priority determination, they are:

1. The existing plant, both the reactor and the control systems, are 25 years old and we have issues with reliability and the availability of spare parts.
2. As a major continuous process industrial site that operates 365 days per year, sales activity is at a low in the summer period and other parts of the integrated processes are scheduled for shutdown in August 2010.
3. We have had major issues with the supply of equipment for this project and we have recently secured a firm delivery date that ties in with the start of a shut down on 09-Aug-2010
4. Our ability to source Formalin from other suppliers in the UK or Europe and so allow continuity of our other processes is restricted by their capacity constraints.

I hope this meets with your approval and that you are able to give our variation request urgent consideration.

Yours sincerely

K Baker
Safety Health and Environment Manager