

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

**UNIT 1 2019 FUGITIVE EMISSIONS REVIEW
FOR CONVATEC LIMITED**

**PPC Permit number NP3433BC
Variation Notice number PP3433LP,
Variation Notice number EA/EPR/NP3433BC/V003,
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Fugitive Emissions Review 2019

1.0 Summary

During 2019 the environmental performance improvements made in 2018 have been realised through the completion of quarterly monitoring and reporting. The amount of VOC emitted to atmosphere has been significantly reduced. The site has not received any odour complaints following the installation of the Regenerative Thermal Oxidiser (RTO) and indeed no general complaints were deemed to have originated from the site's activities. 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 2019.

2.0 Fugitive Emission Review

Fugitive Emission	2019 Review
Emergency Vents	During 2019 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 scenarios i.e. equipment failure, high temperature, high pressure, low compressed air, high levels of explosive gas / vapours, low flow, or an E-Stop being pressed. Through 2019 the RTO went into temporary bypass on seven occasions, mainly due to power cuts experienced in the wider area. This would of course lead to an amount of fugitive VOC emissions, however this feature is essential to ensure the safety of the operation. Given the emergency situations which cause the bypass feature to activate, processes are immediately 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	A project was undertaken in 2019 to redesign the process pipework as such to eliminate the potential of process liquor being entrained within pipework. This project was deemed a success with no records of entrainment and release being made through 2019.
Bund Breaches	During 2019 there have been no recorded bund breaches and so it is determined that fugitive emissions to water via this mechanism have not occurred.

Accidental Release (Spills)	<p>During 2019 there has 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 on 2nd and 3rd April 2019. Site still 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>
Hazardous Waste	<p>During 2019 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, being blown into / entering the atmosphere. Later in 2019 the laboratory at site was partially closed leading to a reduction in the amount of hazards lab waste being generated.</p>