



Mr Andi Kemp
Natural Resources Wales,
Rivers House,
St Mellons Business Park,
St Mellons,
Cardiff,
CF3 0EY

18th August 2015

Ref: Permit BU2110IS – Improvement Programme 22

Dear Mr. Kemp,

I write regarding IP22 which was prescribed under Permit EA/EPR/BU2110IS/V003, issued on 22nd December 2008. Upon general review of IPs and EA/NRW CAR reports under our Permit BU2110IS I noted that IP22 remains open.

Improvement condition 22

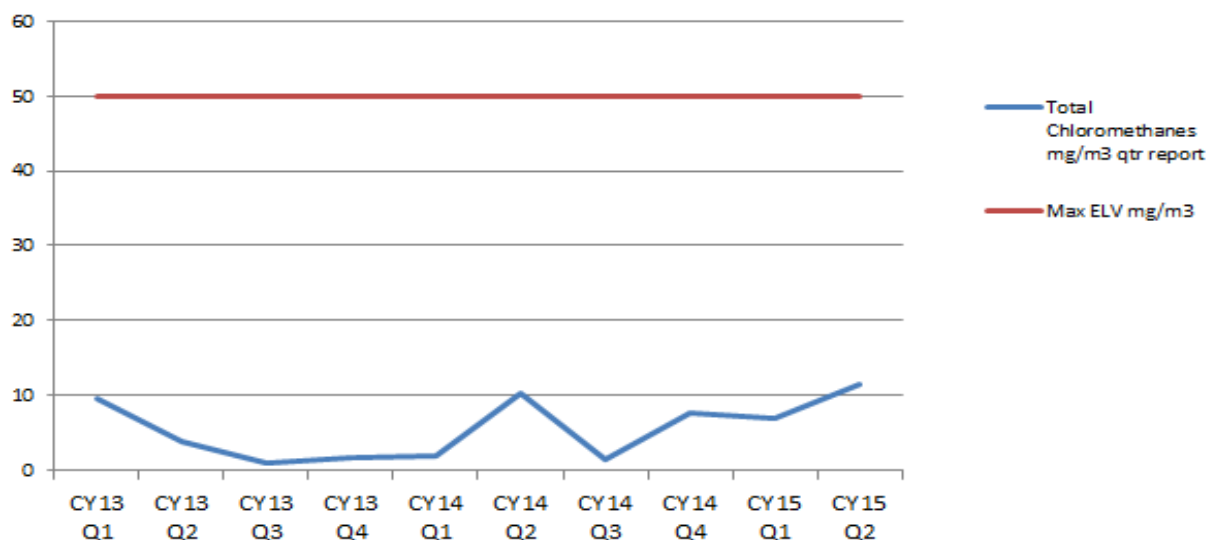
*The Operator shall submit a report to the Agency demonstrating validity of the proposed surrogate method for monitoring emissions of chloromethane species described in the response to IP19. **The surrogate method shall be adopted for compliance monitoring upon written approval by the Agency.***

Since 2008 there have been various exchanges of information and reporting between NRW and Cabot Barry in relation to IP22: The exploration of surrogate methods by Cabot for measurement of Chloromethanes was undertaken as the reliability of BS EN 13639 was questioned by Cabot around that time. On 24.02.2010 Cabot requested deferral of IP22 which was agreed by Ms Liz Franks in later communication in 2010.

However, the work in support of IP22 and pursuit of a surrogate method was in essence, then superseded/nullified by the improvements in Cabot process operations and consequent emissions performance realized from the B4 expansion project (approved under Permit variation V005 23.11.2011).

More recent emissions performance (Cl₂, Chloromethanes data etc.) have been reported to NRW via IP25 and IP26 reports (status closed). In addition, the quarterly emissions reporting on Chloromethanes for the periods pre and post expansion show that all values are consistently below the 50mg/m³ ELV using method BS EN 13639 prescribed in our Permit (ref chart p2) and Cabot have no concerns around the robustness and suitability of the method. The use of this method for Chloromethanes was also endorsed in CAR report ID: BU2110IS/0191110 (06/10/2013)...“the continuation of BS EN 13649 for monitoring chloromethane species and re-adoption of US EPA Method 26A for monitoring chlorine is accepted”.

A1 Stack Emissions Chloromethanes Qtr Mean Reported Values



In light of the above justification, Cabot suggests no further requirement to pursue other monitoring methods for adoption for compliance monitoring of Chloromethanes and to continue with BS EN 13639 as prescribed in our Permit. Cabot therefore requests closure of IP22. I hope that the justification is deemed acceptable to you in closing out this historical Improvement Action but if I can provide you with any further information in the meantime please do not hesitate to contact me.

Yours sincerely,

Paula Lloyd
Plant Environmental Manager
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