

Ref EP 11/93 (V6)

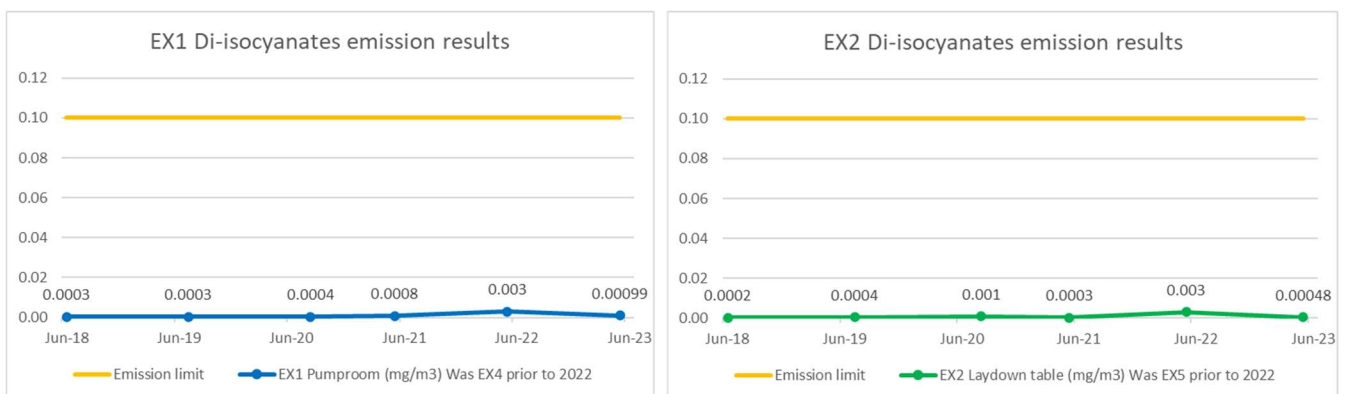
20<sup>th</sup> October 2023

By email:

Dear Mrs Rushby

As previously discussed, please find enclosed our application for variation of permit EP 11/93 (V6) to reflect the current operations and requirements. I have detailed the summary of changes below.

1. Additional emission point 'EX5 IBC Room', relating to newly installed extraction system to the room containing additive chemicals for the production process.
  - This emission point has been tested against our total VOC emission limit; the initial result from a test on 18<sup>th</sup> January 2023 exceeded our limit due to a build up of VOC from the lack of ventilation, we then repeated the test on 23<sup>rd</sup> May following a 3day period of ventilation and confirmed an emission result of 22.5% ELV.
  - We expect the results to reduce further once the LEV is fully in operation and the room has adequate ventilation over a sustained period. Therefore, we request the condition be for us to conduct testing against our VOC emission limit annually until 3 consecutive results below 25% of our ELV, then reducing to 3 yearly.
  
2. Relaxation of condition 16, based on historic results being trivial against our ELV.
  - Current requirement is for annual Di-isocyanates testing of EX1 and EX2 against the ELV of 0.1 mg/Nm<sup>3</sup>, results have not exceeded 3% over the past 5 years.
  - We conduct routine internal inspections of our equipment and annual third party assessments of all site LEV systems including these to ensure these systems are maintained and operating correctly. We also train all our operational staff in the risks to health and environment associated with the use of Di-isocyanates in manufacturing processes.
  - We would like to move this requirement to annually until 3 consecutive results below 25% of our ELV, then reducing to 3 yearly.



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3. Removal/redefinition of condition 17

- We currently conduct a speciated VOC test every 2 years to confirm the emissions from EX2 are predominantly Pentane, we use Pentane as a blowing agent in our production process, this is a blend of Iso-Pentane and Cyclo-Pentane and has been confirmed in the reports from 2018, 2020 and 2023.
- We would like this condition to be removed or redefined to focus on the sources of VOC in the process, such as restricting use of alternative blowing agents.

4. Removal of specific document numbers

- Condition 37 references a document that has been superseded, we requested this is changed to reference the current site procedure.

Please find enclosed

- The application for Variation, *Application for Variation of Part B Permit (20.10.23).pdf*
- A copy of our permit that I have annotated with amendments I believe would reflect our current operations and requirements, *220111 Permit EP 11 93 V6 (Annotated).pdf*
- A graphical overview of the site key operating areas, release points and abatement plant, *Celotex Site Overview 191023.pdf*

Please let me know if you require anything further to support this application.

Yours sincerely

John Roach  
Engineering Manager