

## Hannah Beeby

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**From:** Hannah.Beeby@erm.com  
**Subject:** FW: [EXTERNAL] Huntsman PU BS8656IX - RE: Formal notification to seek decoration against the Huntsman PU, Wilton permitted limits (indefinite derogation)

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**From:** Newton, Andrew <[Andrew.Newton1@environment-agency.gov.uk](mailto:Andrew.Newton1@environment-agency.gov.uk)>  
**Sent:** 07 June 2022 10:16  
**To:** Craig Dunnett <[Craig\\_Dunnett@huntsman.com](mailto:Craig_Dunnett@huntsman.com)>; Hopkin, Rach <[rach.hopkin@environment-agency.gov.uk](mailto:rach.hopkin@environment-agency.gov.uk)>  
**Cc:** PPC, South NE <[ppc\\_south\\_ne@environment-agency.gov.uk](mailto:ppc_south_ne@environment-agency.gov.uk)>  
**Subject:** [EXTERNAL] Huntsman PU BS8656IX - RE: Formal notification to seek decoration against the Huntsman PU, Wilton permitted limits (indefinite derogation)

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Craig,

I can confirm that I received your email indicating an amended notification to seek derogation regarding Nickel and Chromium on the emission point S1 against CWW BAT-AEL's.

I have forwarded the email on 07.06.2022 into our data management system to ensure it is recorded.

I would expect that National Permitting Service (NPS), possibly Rachel Hopkin will respond to the amended notification for derogation accordingly.

Regards,

**Andrew Newton**  
**EPR Inspector**  
**Environment Agency** | North East Area, Teesdale House, Lingfield Way, Darlington. DL1 4GQ.

☎ Direct Dial: +44 7770 704689 (or +44 2030 251677)  
☎ General Enquiry: 03708 506 506  
☎ Incident Hotline: 0800 807060  
✉ Mail To: [Incident\\_Communication\\_Service@environment-agency.gov.uk](mailto:Incident_Communication_Service@environment-agency.gov.uk)  
🌐 Web Site: [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

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**From:** Craig Dunnett <[Craig\\_Dunnett@huntsman.com](mailto:Craig_Dunnett@huntsman.com)>  
**Sent:** 06 June 2022 12:30  
**To:** Hopkin, Rach <[rach.hopkin@environment-agency.gov.uk](mailto:rach.hopkin@environment-agency.gov.uk)>; Newton, Andrew <[Andrew.Newton1@environment-agency.gov.uk](mailto:Andrew.Newton1@environment-agency.gov.uk)>  
**Cc:** Mark Hockborn <[mark\\_hockborn@huntsman.com](mailto:mark_hockborn@huntsman.com)>; Philip Togwell <[Philip\\_Togwell@huntsman.com](mailto:Philip_Togwell@huntsman.com)>  
**Subject:** Formal notification to seek decoration against the Huntsman PU, Wilton permitted limits (indefinite derogation)

Rachel, Andrew,

The Huntsman production process relies upon large quantities of Nitric Acid that has trace contamination of chromium and nickel. The process does not add any additional contribution and the contamination is passed through, resulting in an emission concentration in excess of the respective BAT-AELs.

An options appraisal and engineering review since the release concentration was identified in November 2021 is continuing. Findings to date indicate that if the site were to treat the effluent to reduce the marginally elevated chromium and nickel emissions down to the BAT-AEL levels, this would result in increases in additional raw material use for the treatment process and consequent release into the Tees Estuary, increased energy usage; and increased waste arisings from the installation as a whole. The result would be a transfer of impact from the release of chromium and nickel to the impact from the treatment process, disproportionate to the scale of the reduction of the contaminant metals. Reducing the emissions of one pollutant would be more than offset by the increase in the emissions of another.

No other Nitric Acid suppliers exist in the UK for the quantity required and therefore substitution of raw material (if indeed it would result in a lower level of contamination) would require import of a large volume of a dangerous substance from outside of the UK. Substitution is not considered a viable option for this reason.

The contamination of the Nitric Acid and the potential means of removing it from Huntsman's effluent is not expected to alter over time, therefore Huntsman considers a non-time-limited derogation process is justified for the BAT-AELs for chromium and nickel on the technical grounds.

Please can you acknowledge receipt of this notification?

Craig Dunnett  
EHSQ Manager

Huntsman Polyurethanes (UK) Ltd, Wilton, Redcar TS10 4RG  
Tel: +44 (0)1642 83 4142  
Mob: +44 (0)7494 905 306  
Email: [craig\\_dunnett@huntsman.com](mailto:craig_dunnett@huntsman.com)



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