

Danny Dunstan

From: Craig Dunnett <Craig_Dunnett@huntsman.com>
Sent: 12 May 2022 11:24
To: Rach Hopkin; Newton, Andrew
Cc: Mark Hockborn
Subject: Formal notification to seek decoration against the Huntsman PU, Wilton permitted limits
Attachments: Derogation Reasons 27 April 2022.pptx

Rachel, Andrew,

Formal notification to seek decoration against the Huntsman PU, Wilton permitted limits

We consider a justified derogation case in relation to the slightly elevated levels of both Chromium and Nickel within the S1 discharge against the CWW BAT-AELs, compliant with Article 15 (4) on the basis of *“(a) the geographical location or the local environmental conditions of the installation concerned”* as the primary eligibility factor and a secondary factor under *“(b) the technical characteristics of the installation concerned”* as detailed below and within the attached presentation.

(a) the geographical location or the local environmental conditions of the installation concerned, e.g.:

- the installation uses a locally available raw material that affects the emissions, and importing the raw material upon which compliance with BAT-AEL depends would require substantial infrastructure investment and increased transport costs;
 - the installation uses locally available Nitric Acid that contains sufficient Chromium and Nickel to result in the Huntsman S1 discharge not meeting BAT-AELs for those substances
 - There is nowhere else in the UK /no other supply that can be used as an alternative.
 - Importing the raw material upon which compliance with the BAT-AEL depends from other counties would result in the material travelling over significant distances, result in dramatically increased transportation costs, represent a safety risk through transportation of dangerous substances and may still not resolve the issue as Nitric Acid will leach Cr and Ni from stainless steel.

(b) the technical characteristics of the installation concerned e.g.:

- atypical cross media impacts would arise whereby reducing the emissions of one pollutant increase the emissions of another;
 - Treatment of the Cr and Ni (under investigation) may result in requirement for use of considerable quantities of dosing chemicals to precipitate the metals due to the low concentration of Cr and Ni.
- atypical cross media impacts would arise whereby reducing the emissions of one pollutant increase the emissions of another;
 - Use of alternate Ni catalysts has been extensively trialled in the operating plant and resulted in similar releases of Nickel

Please can you acknowledge receipt of this request?

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

Huntsman Polyurethanes in the UK is part of Huntsman Polyurethanes (UK) Limited, a company registered in England under registration number No. 3767067 with its registered office at Concordia House, Glenarm Road, Wynyard Business Park, Billingham TS22 5FB, UK. Huntsman Polyurethanes (UK) Limited is a subsidiary of Huntsman Corporation, which is listed on the New York Stock Exchange. For more information on Huntsman companies please visit our website www.huntsman.com

