

From: [HALL Mark](#)
To: [SM-Defra-RESP-notifications \(DEFRA\)](#)
Cc: [Bett, Andy](#)
Subject: RE: Application Validation Request for Further Information - EPR/GP3536AC/V004 - Vynova Runcorn Ltd
CRM:0172023
Date: 29 August 2024 13:14:54
Attachments: [image001.jpg](#)
[image002.png](#)
[EMS 646823 - 1.pdf](#)

Good afternoon,

Please find below the responses to the request for further information regarding our permit variation application...

1. The Environmental Management System has been continually externally verified by BSI, subject to six monthly audits, including re-certification. Please find attached a copy of the latest ISO14001 certificate issued by BSI.

2. I confirm that the Vynova installation boundary is unchanged by the variation, but as shown in the submitted application document VRL_PartC2_5a there are some equipment closures, changes and new items within this boundary (which have been fully described in the submitted document VRL_PartC2_2b)

3a. I confirm that there are no additional point source emissions to air, in fact the number of continuous air emissions points (i.e. normal operation) has been reduced from 13 to 1 as described in the LVOC BAT 10 demonstration on page 11 of submitted document VRL_PartC3_3a. This is one of the main aims of the project to meet the BRef requirements. The remaining continuous air emission point will be the existing Incineration Plant Flue Gas Stack HPE-1 (was previously named DC-1). There are also no changes to the parameters of these point source emissions other than further reductions in some cases e.g. VCM will no longer be sent from the INEOS Pilot Plant, hence the wet vent system will no longer include this. Descriptions of these changes/improvements are fully described in the submitted document VRL_PartC3_2.

There are some slight local geographical changes in vent locations from new equipment rather than the old but all within the existing plant boundary (see submitted document VRL_AirEmissions) and certainly not significant enough to change any impact on surrounding human and ecological receptors, hence I can confirm that the existing impact assessments are unchanged or improved in some cases.

3b. Previous 3 full years before plant was shutdown in May 2022, normal operation EDC emissions were 240163 kg in 2019, 206091 kg in 2020 and 237795 kg in 2021. Post Project Summer, when all normal operation emissions are directed to the thermal oxidiser, the expected EDC point source emissions to air will be minimal, <250 kg within a year.

Abnormal operating conditions have been fully described in the submitted document VRL_PartC3_3b.

I hope this clarifies the points raised in our conversation on 13 August 2024 and allows for continued checking of the permit application to be 'duly made' and the determination process to begin, but please contact me for any further points of clarification.

Kind regards,
Mark Hall.

PS. We are still working on updating the Overview Process Flow Diagram and will revert on this, as described in your email below, as soon as possible.

Kind regards, Met vriendelijke groeten, Freundliche Grüße, Meilleures salutations,

Mark Hall

Runcorn Plant Manager



A dedicated partner of VinylPlus®



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From: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>

Sent: Thursday, August 15, 2024 12:30 PM

To: HALL Mark <Mark.Hall@vynova-group.com>

Cc: Bett, Andy <andy.bett@environment-agency.gov.uk>

Subject: Application Validation Request for Further Information - EPR/GP3536AC/V004 - Vynova Runcorn Ltd CRM:0172023

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Mr Mark Hall
Vynova Runcorn Limited
Banks Lane Office
Banks Lane
Runcorn
Cheshire
WA7 4EL

Date: 15 August 2024

Dear Mark

We need more information about your application and (potentially) underpayment of application charge

Application reference: EPR/GP3536AC/V004
Operator: Vynova Runcorn Limited
Facility: Runcorn Manufacturing Site

Thank you for your application received on 19 July 2024. The following is to confirm our conversation of 13 August 2024

We need to ask you for some missing information and/or clarification before we can do any more work on your application. In our conversation you explained that although this is a substantial change to parts of the installation you consider that the substance used and processes employed are unchanged or very similar so the environmental impact will remain unchanged or improve.

To confirm this please provide us with more information to address the following points.

1. The Environmental Management System summary you have submitted is very high level. Our application form says that if the variation does not introduce a new activity we do not need to see a full assessment against all the factors in our guidance. However, there is significant change in some parts of the site operations.

Please submit a copy of your current externally verified ISO14001 certificate as evidence that changes are being adequately controlled.

2. There are changes to the operation of some areas of the installation, including some processes that will cease.

Please confirm there is no change to the installation boundary.

3. In your submitted document VRL_PartC2_6 you give an assessment of environmental impact for the HPE plant under normal operating conditions and other than normal operating conditions showing actual emission rates for various substances are lower than 'threshold conditions'. In our

conversation you said that you had not submitted a full impact assessment at human and ecological receptors as you believe this was assessed at the Large Volume Organic Chemicals Sector permit review and this variation is expected to improve or leave the emissions unchanged. This expectation is to be confirmed by monitoring during commissioning of the variation changes.

Please confirm that there are no changes or additions to the location or parameters of point source emissions to air or water

Please submit a quantitative comparison of the expected emissions before and after the changes or a confirmation in each case that it will remain unchanged.

If this is not possible and you do have to submit an assessment of the environmental impact at receptors there would be an additional fee of £779 to assess the submitted information.

Please reply directly to this email with your information and copy in andy.bett@environment-agency.gov.uk.

You must send us the information and payment (if necessary) by Thursday 29th August 2024.

If necessary, details of how to pay are given in Part F of the application form

If we do not receive this by this deadline we will return your application.

If we receive what is missing by the deadline, we will continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by email whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges> ||

We have also identified the following missing information, which although it will not prevent us from duly making the application, will be required during determination. You should provide this information as early as possible to avoid delays during determination.

An updated HPE Overview Process Flow Diagram addressing some apparent inaccuracies in the current submitted version (for example the H751 Incinerator does not seem to have any process vent inputs, the wet vent header and header diversion lines do not have a clear starting point connection).

Please reply directly to this email with your information and copy in psc@environment-agency.gov.uk. Without this additional information we will be unable to issue your permit.

Note: Our email system has a file size limit of 25MB, if your returns exceed this limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it.

If you have any questions, please phone me on 0782 723 2597 or email andy.bett@environment-agency.gov.uk.

Yours sincerely

Andy Bett
Principal Permitting Officer – National Permitting Service

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