

ExxonMobil Chemical Limited
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Ermyrn Way
Leatherhead
KT22 8UX

If telephoning ask for:
Ian Brocklebank

24 April 2018

FAO: Company Secretary

Dear Sir/Madam

FINAL WARNING LETTER: FWL-2018-1610

POLLUTION PREVENTION AND CONTROL (SCOTLAND) REGULATIONS 2012 (AS AMENDED)

This final warning letter replaces the letter sent on the 13 April 2018, in response to your request for SEPA to clarify the 3rd bullet point listed for the event between the 12 June 2017 and the 17 June 2017.

FLARING EVENT BETWEEN 12 JUNE 2017 AND 17 JUNE 2017 AT THE FIFE ETHYLENE PLANT (PERMIT NUMBER PPC/A/1013494) (AS VARIED)

Regulation 22 (1) of the Pollution Prevention and Control (Scotland) Regulations 2012 (As Amended) state that it is a condition of a permit for a Part A installation that the Operator must use the best available techniques for preventing or, where that is not practicable, reducing emissions from an installation.

Between 12 June 2017 and 17 June 2017 elevated flaring occurred at the Fife Ethylene Plant.

SEPA Officers investigated the incident and ascertained that this flaring followed the breakdown of a duty condensate pump and the stand-by pump was not available as it was undergoing repairs.

The SEPA Officers identified that there were failures in maintenance practices at the site which led to the extended period of flaring; in particular

- failure to maintain a pump within a reasonable amount of time;
- inadequate holding of spares;
- failure of a pump due to a different specification of bolt to those expected having been installed by the supplier.

These failures are considered to be a failure to implement best available techniques (BAT) with respect to management and maintenance which could have reduced the emissions from the installation and therefore a breach of the permit condition included by Regulation 22 (1) of the Pollution Prevention and Control (Scotland) Regulations 2012.

Continued...



Chairman
Bob Downes

Chief Executive
Terry A'Hearn

SEPA Edinburgh Office
Silvan House, 3rd Floor, 231 Corstorphine Road,
Edinburgh EH12 7AT.

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Emission of Smoke on 18 June 2017 which exceeded Ringelmann Shade 2 for more than 15 minutes at the Fife Ethylene Plant.

Condition 4.1.1 of Permit PPC/A/1013494 requires that smoke of Ringelmann Shade ¹ 2 is not emitted from the elevated flare for more than 15 minutes. Between 1927hrs and 1955 hrs on 18 June 2017 smoke was emitted from emission point A16, which exceeded Ringelmann Shade 2 for more than 15 minutes. This is a breach of Condition 4.1.1.

SEPA Officers investigated the incident and as a result identified that this was due to a reduction in steam header pressure on the loss of ethane feed.

I must advise you that this letter constitutes a final warning. Any further/continued contravention of the above legislation is likely to result in enforcement action being taken against you by SEPA. Such enforcement action could include the submission of a report to the Procurator Fiscal recommending prosecution, and such a report may include the incident(s) referred to in this letter.

If you have any questions about this letter, please contact Ian Brocklebank at SEPA's Edinburgh Office telephone 0131 273 7250.

Yours faithfully

Rob Morris
Interim National Technical Support Unit Manager
Compliance & Beyond
Environmental Performance

CC Sonia Bingham, Fife Ethylene Plant, Cowdenbeath, Fife, KY4 8EP

¹ Ringelmann charts (BS 2742) are used to assess smoke emissions and compare the darkness of smoke with standard shades of grey on a scale of 0 (white) to 5 (black).