

Environment Agency Permitting decisions

Variation

We have decided to allow the variation for Deeside Engine Casting Plant operated by Toyota Motor Manufacturing UK Ltd

The variation number is EPR/BK6483IU/V004

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Structure of this document

- Annex 1 the decision checklist

Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/ notice.

Aspect considered	Justification / Detail	Criteria met
		Yes
Consultation		
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.	✓
European Directives		
Applicable Directives	All applicable European Directives have been considered in the determination of the application.	✓
The site		
Extent of the site of the facility	The existing Environmental Permit contains a site plan which we consider is satisfactory, showing the extent of the site of the facility. As part of the variation application, the operator provided an installation plan (plan 5 in the application). This plan shows the location of the casting plant, waste water treatment plant and swarf wash; however due to the colours used to denote these locations, it suggested a reduction in the permitted area on the site. This would have required a partial surrender, which was not the intention of the operator. The operator's intension was to highlight the locations of the permitted activities and the directly associated activities within the installation boundary. After discussing this matter with the operator, a revised installation plan was submitted which clarifies this issue. This installation plan records the location of the casting plant, waste water treatment plant, swarf wash, associated connecting infrastructure and haul routes in addition to some new buildings on the site that aren't recorded on the site plan. This Installation plan is added to Schedule 2 of the permit to show the location of the casting plant, waste water treatment plant, swarf wash, associated connecting infrastructure and haul routes only	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	The site boundary has not changed as a consequence of this, and the operator is required to carry on the permitted activities within the site boundary as per the existing site plan contained within schedule 2 of the Environmental Permit.	
Site condition report	The operator has provided a description of the condition of the site. We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports – guidance and templates (H5).	✓
Biodiversity, Heritage, Landscape and Nature Conservation	The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat. This application won't result in any increase in emissions; therefore no new assessment is required. We have not formally consulted on the application. The decision was taken in accordance with our guidance.	✓
Environmental Risk Assessment and operating techniques		
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. This application won't result in any increase in emissions; therefore no new assessment is required. The operator's risk assessment is satisfactory.	✓
Operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. Non – Ferrous Metals and the Production of Carbon and Graphite EPR 2.03 covers the melting of non ferrous metals. Indicative BAT includes the reduction of raw material usage by the recycling of process residues (which in this case is swarf and coolant). This change will result in reduced use of raw materials, energy and off site impacts associated with the reprocessing of the swarf by a third party. The proposed use of hot process gases to dry materials is also indicative BAT. In implementing this proposal the applicant will be improving their environmental performance through the application of techniques considered indicative BAT. The Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste IPPC S5.06 has been used to assess that the systems and procedures proposed by the applicant are in accordance with	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	indicative BAT for the use of scrap aluminium and processing of swarf. With regards to third party scrap, the applicant has provided details of the pre-acceptance procedures and the waste storage arrangements. This is set out in a formal procedure no. P-HME. 0.0.0-P12. The procedures set out in the document meet the requirements of indicative BAT. This procedure has been incorporated into the permit in table S1.2. The proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the facility.	
Waste types	We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.	✓
Improvement conditions	Based on the information on the application, we consider that we need to impose improvement conditions. We have imposed improvement conditions to ensure that: Once swarf recycling and use of third party scrap is incorporated into normal production at the installation, the emissions to air are consistent with the results from the trials submitted in support of the application. This will be achieved by undertaking a round of monitoring within the first 3 months of the changes having been commissioned.	✓
Incorporating the application	We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process. These descriptions are specified in the Operating Techniques table, S1.2, in the permit. As part of the application procedures have been provided covering waste acceptance checks and storage	✓
Monitoring	We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. Additional short term monitoring requirements have been	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	imposed as an improvement condition in order to confirm that, once the recycling of swarf and aluminium is operational, the emissions are consistent with those recorded during the trials Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.	
Operator Competence		
Environment Management System	There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.	✓