Industrial Waxes Limited

9th September 2014

Natural Resources Wales
"Maes Newydd"
Llandarcy
Neath Port Talbot
SA10 6JQ

Attention of Ffion Thomas

The Pollution Control Regulations 2000
Permit number BV5858 IW

Dear Madam

Further to discussions on the 12th of August we would request that you consider the proposal detailed below under Condition 1.5 "Minor Operational Change".

We propose to install an additional Cyclone and Packing Station for Niro 1. This is to enable us to produce and pack Pharma products to the required GMP standard for our customer. The additional cyclone would be used only when producing this grade of material with the packing station housed in a Class 5 Clean room.

Location
The cyclone and packing station would be located as show on the enclosed drawing. Ductwork would be extended to connect the Niro 1 and the Bag filter to the cyclone.

Review of effects on existing application and permit conditions
Application
A review of the application, subsequent variation and minor operational changes showed that there would be no change to the existing operations other than the additional cyclone and packaging location
All the existing abatement techniques would apply.

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Permit
Condition 1.5
The unit would not be commissioned before this application is approved by the Agency.

Operation
The operation would be the same as the existing Niro 1 production line. The new cyclone would be connected to the Niro spray chamber and Bag filter unit in the same way as the existing packing station by the use of sealed airvey pipes.

We have also enclosed a completed Minor Operational Change and Variation assessment Form.

We look forward to you reply, in the mean time if you require further information please contact me.

Yours faithfully



Brian Cooper

Enc.
Amended Plant Drawings
Minor Operational Change and Variation assessment Form

Minor Operational Change and Variation assessment Form

Overview:

- When a change to operation, plant or machinery or infrastructure is planned, an assessment of the likely impacts should be performed to include possible additional impacts upon the environment.
- This is a legal requirement for PPC permitted sites. Changes must be notified to the Environment Agency under Regulation108 (4) of the EP Regulations 2010 at least 14 days before the change is made.
- This assessment should be completed in conjunction with EPR08 –"Changes in Operation" in case a permit variation is required due to the changes proposed being more significant. If so, refer to section 4.3 of EP scheme & guidance document:

http://www.environment-agency.gov.uk/static/documents/Business/EP_scheme_and_guidance_2011-12.pdf

Project Title:	Installation of additional Niro 1 Cyclone and Packing Station for production of Pharma products using existing Emission Points
Date of planned change:	September 2014
Why are changes needed?	To meet customer requirements for packing product in Class 5 clean room
Description of planned changes:	Relocate Niro 1 Cyclone to location shown in attached drawing to allow for packaging of material to be conducted in clean room
Updated site plans / drawings required?	See attached updated plans

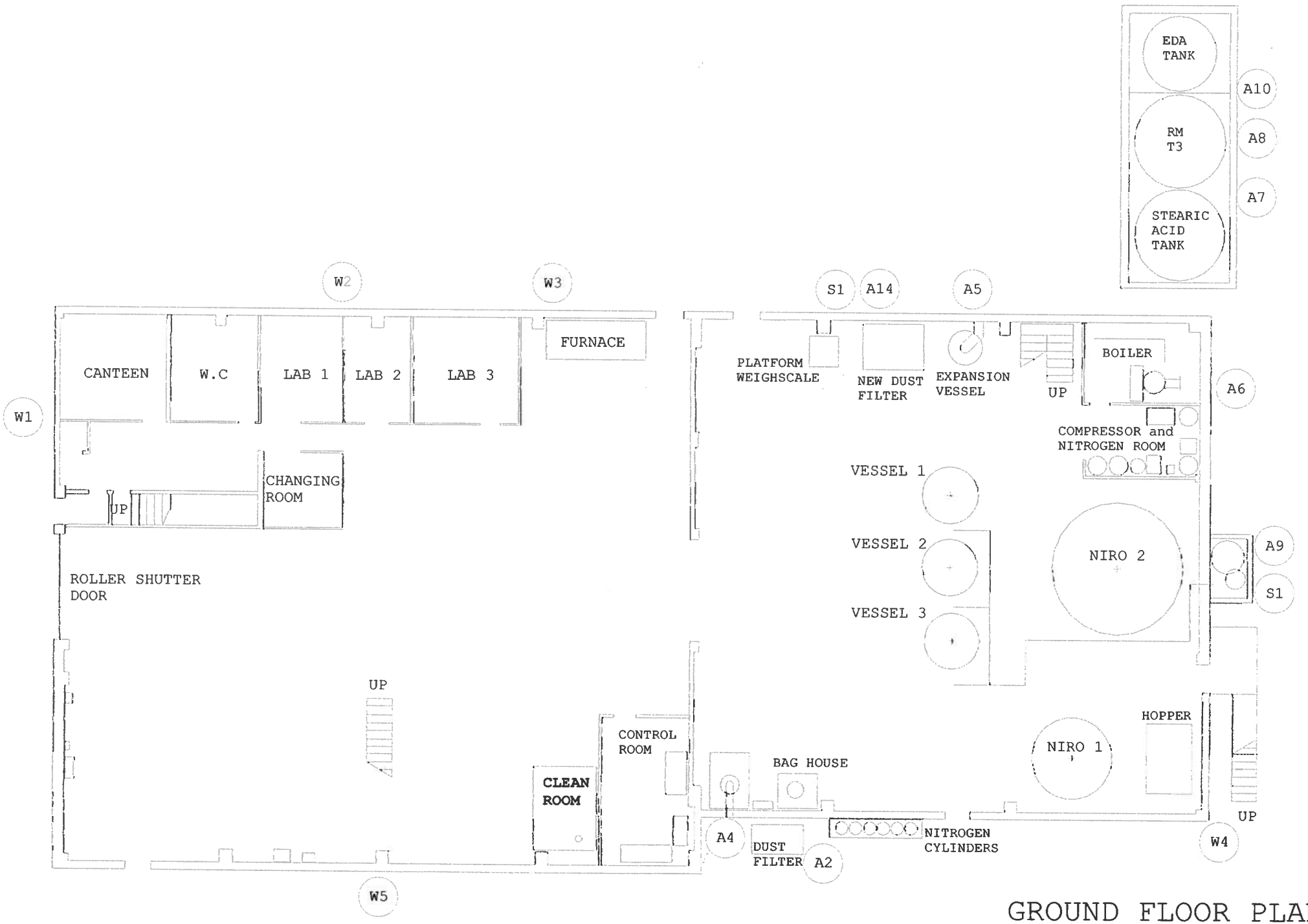
Minor Operational Change and Variation assessment Form

Instructions:
• Mark a negative impact with a '-' sign. Mark a significant negative impact with a % where possible
• Mark a positive impact (such as an overall reduction in energy with a '+' sign. Mark a significant negative impact with a % where possible
• Leave blank if there is no overall change

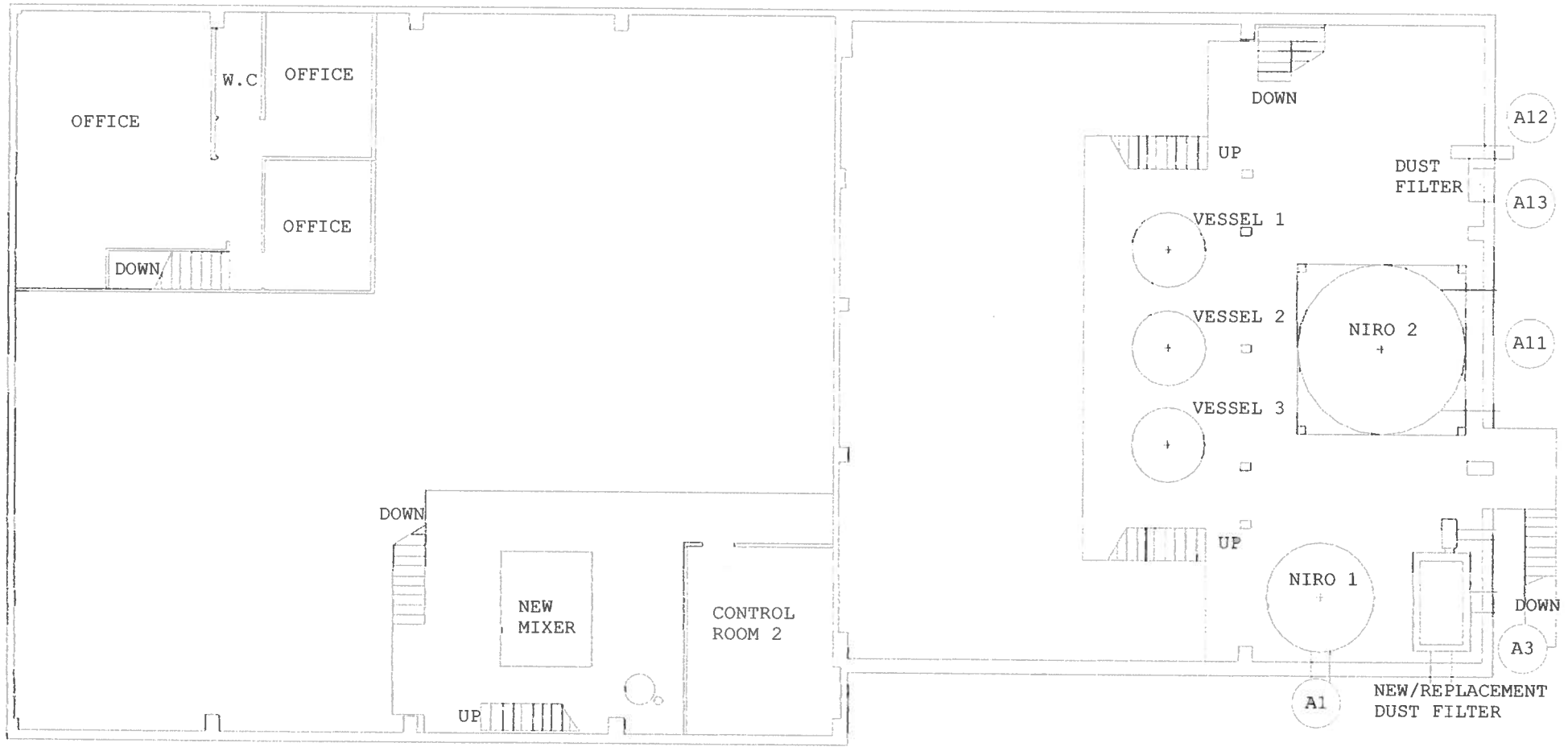
Emission	Will the change result in...?	+ / - as (%)	Overview	Preventative Measures proposed to reduce risk
Listed Activity	Meeting Threshold or activity specified in Part 2 Schedule 1 This may well require a variation see EPR 08		No change to existing Permit	
Permit	Contravention of Permit Condition This may well require a variation see EPR 08		No change to existing Permit	
Energy	Change in energy use (gas / electricity) or GHG;s produced		No change to existing Permit	
Sewer	Change in volume or substances in process water released to sewer (cooling / cleaning)		No change to existing Permit	
Surface Water	Change in volume or substances in surface water released from site		No change to existing Permit	
Air	Emissions to Air (smoke / steam / combustion gases)		No change to existing Permit - existing discharge point maintained	
Raw materials	Change in raw material use (includes cleaning chemicals)		No change to existing Permit	

Minor Operational Change and Variation assessment Form

Waste	Change in waste volume production (recovery or disposal)		No change to existing Permit	
Noise / Vibration	Emissions of Noise or Vibration		No change to existing Permit	
Odour	Emissions of Odour		No change to existing Permit	
Accidents	Increased potential for accidents		No change to existing Permit	



GROUND FLOOR PLAN



FIRST FLOOR PLAN



SECOND FLOOR PLAN