

19th November 2012

Environment Agency Wales
"Maes Newydd"
Llandarcy
Neath Port Talbot
SA10 6JQ

Attention of Doug Cowie

The Pollution Control Regulations 2000
Permit number BV5858 IW

Dear Sir

Further to discussion and your e-mail of the 12th November 2012 we would request that you consider the proposal detailed below under Condition 1.5 "Minor Operational Change".

We propose to increase the capacity of the Bag Filter Unit associated with Niro 2 Production Line. To enable us to complete this with the minimum disruption to the production on this line we propose installing the new unit while running the exiting unit then changing over. The reason for the change is to allow us to maintain production capacity when producing low melt point waxes.

Location

The location of the new unit will be adjacent the cyclone separator unit as show on the amend Plant Drawings attached. The explosion relief panels will vent through the north side of the building through point A14 with the discharge from the unit exiting thought the current vent point A12.

Bag Filter Unit Details

Capacity 7,000 cubic meters per hour
Manufacture DCE Ltd
Construction Reverse jet cartridge filter unit

Sturmi Way,
Village Farm Industrial Estate,
Pyle, Mid Glamorgan,
South Wales, CF33 6BZ, UK

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Registered in England No 4646926



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Industrial Waxes Ltd

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 increased use of air and the additional vent point.

All the existing abatement techniques would apply.

Permit

Condition 1.5

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

Condition 2.2

There would be an additional Emission point to air, this would be the units explosion relief vent, marked A14 on the attached drawing.

Operation

The operation would be the same as the existing bag filter unit on Niro 2 production line.

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



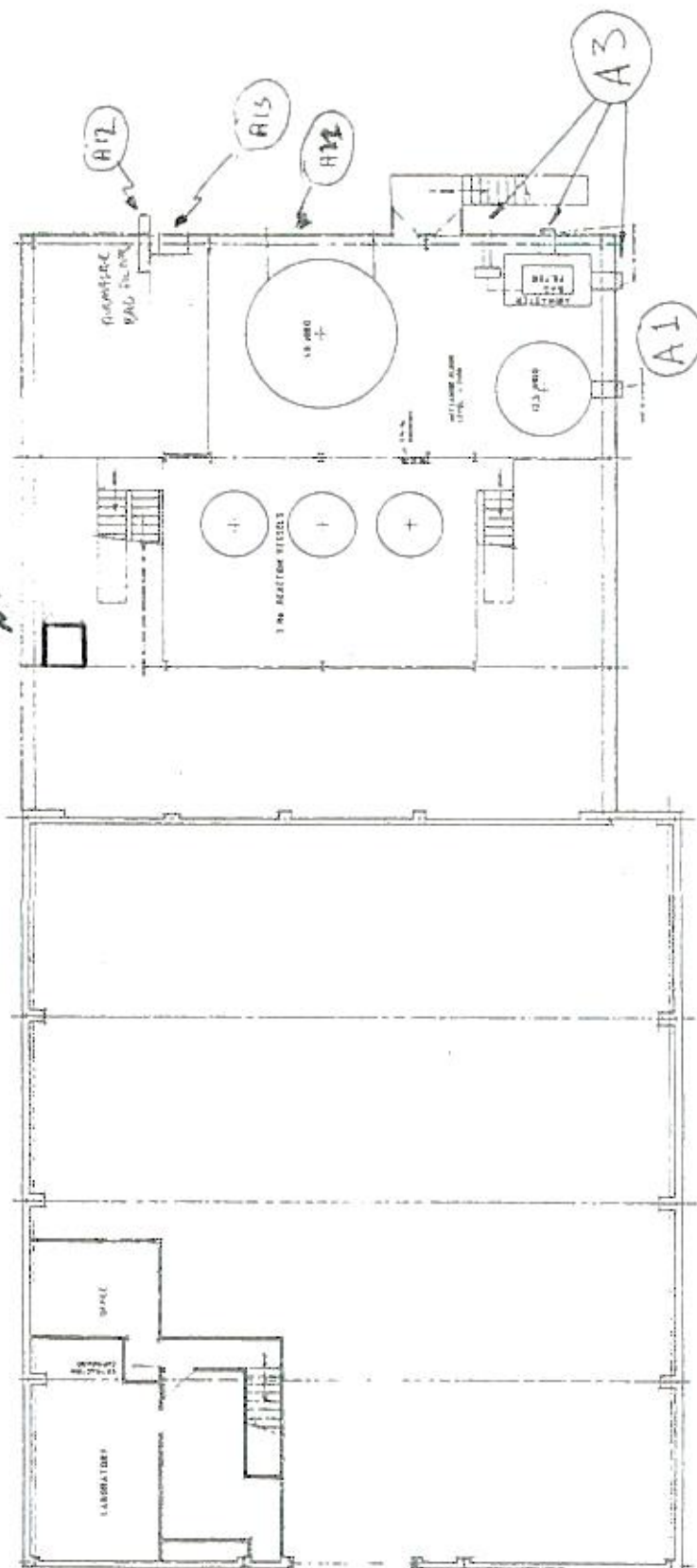
Brian Cooper

Enc.

Amended Plant Drawing

Minor Operational Change and Variation assessment Form

Proposed Vent
A14



FIRST FLOOR PLAN.

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 Regulation 108 (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:	Increased capacity of the Bag Filter Unit Associated with Niro 2 Production Line
Date of planned change:	December 2012 / January 2013
Why are changes needed?	The reason for the change is to allow us to maintain production capacity when producing low melt point waxes.
Description of planned changes:	<u>Location</u> The location of the new unit will be adjacent the cyclone separator unit as show on the amend Plant Drawings in appendix 1. The explosion relief panels will vent through the north side of the building throught point A14 with the discharge from the unit exiting thought the current vent point A12. <u>Bag Filter Unit Details</u> Capacity 7,000 cubic meters per hour Manufacture MCE Ltd Construction Reverse jet cartridge filter unit
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			
Permit	Contravention of Permit Condition This may well require a variation see EPR 08			
Energy	Change in energy use (gas / electricity) or GHG;s produced	-	Fan motor increased from 4kW to 11kW	
Sewer	Change in volume or substances in process water released to sewer (cooling / cleaning)			
Surface Water	Change in volume or substances in surface water released from site			
Air	Emissions to Air (smoke / steam / combustion gases)	-	Increase volume of air used	
Raw materials	Change in raw material use (includes cleaning chemicals)			

Minor Operational Change and Variation assessment Form

Waste	Change in waste volume production (recovery or disposal)			
Noise / Vibration	Emissions of Noise or Vibration		Fans will be fitted with silences	
Odour	Emissions of Odour			
Accidents	Increased potential for accidents			