



Natural Resources Wales
Chester Road
Buckley
Flintshire
CH7 3AJ

Attention of: Alison Soper – Regulatory Officer PPC/RSR

26th February 2016

Dear Mrs Soper

Re: Improvement Programme Item Reference IC37 - Permit Number: EPR/BR9383ID/V007

Please find enclosed a report to satisfy the requirements of Improvement Programme Item Reference 37 as referenced in Table S1.3 of the Environmental Permit.

I trust this information is satisfactory, however, please do not hesitate to contact me should you require any further information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Keouski'.

Claire Keouski
HSE Manager

Introduction

This document is submitted to meet the requirement of Improvement Programme Item Reference 37 of Table S1.3 of the EPR Permit, which stipulates that *'the operator shall confirm in writing whether the daily average limit of SO₂ continuous monitoring or the mass emission per tonne of melted glass will be the most appropriate limit for the site'*.

Conclusion & Justification

Continuation with the daily average limit of SO₂ by continuous monitoring is deemed the most appropriate for the site, as:

- Continuous monitoring data can be viewed for daily or minute by minute observation from real time trends established in the Enviman ComVisioner software, which is used to check for ongoing compliance with regard to short-term excursions, thirty-minute averages, daily averages and is also used for monitoring emissions during incidents or problems with the furnace operation.
- Mass emission reporting of SO₂ per tonne of melted glass is a commercially sensitive performance indicator and would enable derivation of process performance data by a competitor who understands the process.

C. Keouski
HSE Manager