

	INITIALS	DATE
CX FOR PUBLIC REGISTER	10	8/9/08
COPIED TO PUBLIC REGISTER	AL	10/9/08

Environment Agency Permitting Decisions

We have decided to vary (simple standard variation) the permit for Warwick International Limited to produce synthetic rubbers where the annual production is less than 2,000 tonnes for use in chewing gum formulations as a biodegradability modifier.

The permit number is EA/EPR/BU2357IP/V009
The operator is **Warwick International Limited**
The facility is located at Dock Road, Mostyn, Holywell, Flintshire, CH8 9HE.
The decision was effective from 20/08/08

Summary of the decision

We have decided to vary, subject to the conditions in the permit.

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 environment protection is provided.

This variation notice has been issued in response to an application by Warwick International Limited to permit the production of a copolymer of a high viscosity synthetic rubber and a powdered polyol for use in chewing gum formulations as a biodegradability modifier. This introduces a new Schedule 1 activity namely Section 4.1 Part A(1)(a)(ix) producing organic chemicals such as synthetic rubbers where the annual production is less than 2,000 tonnes.

Production is to take place in an existing building suitably refurbished and will not introduce any new emission points to air, water or land with the exception of a vent from the initial 75 litre, and later the proposed replacement 290 litre, heated mixing equipment. This emission to air is considered to contain a low level of volatile organic compounds from the combined mixing of raw materials at elevated temperatures. The polymerisation reaction does not yield any by-products. Wash water usage and solid and packaging wastes are expected to be low. The raw materials are to be heated to reduce viscosity or melt as appropriate and a nitrogen blanketed may be employed to minimise discolouration. The resulting product may either be formed into its final shape after mixing, or may be washed, dried, and then formed prior to packing for shipment.

Warwick International Limited has been granted commercial confidentiality with respect to certain details relating to the raw materials, operating conditions and process equipment employed to protect the commercial development of novel additives for chewing gum formulations.

Purpose of this document

This decision document:

- explains how the applicant's application has been determined;
- provides a record of the decision-making process;
- shows how all relevant factors have been taken into account; and
- justifies the specific conditions in the permit.

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

Structure of this document

- Key Issues of the decision;
- Annex 1 the decision check list;
- Annex 2 the consultation responses – Not applicable, simple standard variation, annex deleted.



Handwritten signature and date: 20.08.08

Key Issues of the decision

Environmental Risk

This variation does not introduce any significant environmental risks and if determined in isolation would qualify as a low impact installation.

There may be a small release to air of volatile organic compounds from the original feedstocks on mixing at elevated temperatures for which an improvement item to quantify has been included. It is not considered necessary to monitor routinely. The process does not produce any by-products.

Water usage will be minimal at 100 litres per day wash water, routed to the existing ETP with a permitted daily discharge volume limit of 4500 m³ (2250 m³ per tide) to the Dee Estuary, a site of European importance, considered adequately protected by permit BU2357, as previously amended.

Solid process waste and packaging are considered to be minimal with reprocessing feasible.

Operational Techniques

Production is to take place in an existing building suitably refurbished. The process will be integrated into the sites existing operating techniques, management controls and EMS.

Commercial and industrial confidentiality

Warwick International Limited has been granted commercial confidentiality with respect to certain details relating to the raw materials, operating conditions and process equipment employed to protect the commercial development of novel additives for chewing gum formulations.

Annex 1: Decision checklist

Bespoke permit variation (simple standard).

Activity	Justification / Detail	Determination criteria met	
		No	Yes
Receipt of submission			
Application fee	The application fee is correct		✓
Commercial confidentiality	We have accepted the claim for commercial confidentiality. We consider that the inclusion of the relevant information on the public register would prejudice the applicant's commercial interests to an unreasonable degree. The reasons for this are given in the notice of determination for the claim. The decision was taken in accordance with Guidance on commercial confidentiality.		✓
Consultation			

Activity	Justification / Detail	Determination criteria met	
		No	Yes
Scope of consultation	Not applicable - Simple standard variation		✓
Operator			
Control of the facility	We are satisfied that the applicant is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator		✓
European Directives			
Applicable Directives	No new directives introduced		✓
The site			
Extent of the site of the facility	Not applicable		✓
Planning permission	Not applicable		✓
Site condition report	Not applicable		✓
Environmental Risk Assessment and operating techniques			
EIA	Not applicable		✓
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment, all emissions may be categorised as environmentally insignificant.		✓
Operating techniques	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.		✓
The permit conditions			
Use of conditions other than those from the template	Not applicable		✓
Odour alternative conditions	Not applicable		✓
Noise alternative conditions	Not applicable		✓
Raw materials	Production restricted to less than 2,000 tonnes		✓
Waste types	Not applicable		✓
Pre-operational conditions	Not applicable		✓
Emission limits	Not applicable		✓
Monitoring	Improvement item to quantify VOCs – no routine monitoring required		✓
Reporting	As above		✓
Operator Competence			
Technical competence	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.		✓
Relevant Convictions	No relevant convictions.		✓
Financial provision	Not applicable		✓
OPRA			
Opra Score	The Opra score is 410 The Opra score has changed due to an additional activity		