

Notice of variation with introductory note

Environmental Permitting (England & Wales) Regulations 2010

Warwick International Group Limited

Warwick Chemicals
Dock Road
Mostyn
Holywell
Flintshire
CH8 9HE

Variation application number

EPR/BU2357IP/V012

Permit number

EPR/BU2357IP

Warwick Chemicals

Permit number EPR/BU2357IP

Introductory note

This introductory note does not form a part of the notice

The following notice gives notice of the variation of an environmental permit.

This variation removes one point source emission (A3) and amends another (A20) as a result of process changes on site which involve three areas of the site closing down. These areas had previously served a batch production process on site. These are now to be replaced by a continuous production process which will see an improvement in product quality and a reduction in energy usage on site.

This variation also corrects a numbering error from the previous variation where by an improvement condition and table was added as condition 2.4 in error, overwriting the existing 2.4 condition relating to efficient use of raw materials. The improvement condition has now been corrected (to the original condition 1.4.1) and a further improvement condition added to the table requiring the operator to review emissions from the site after the commencement of the AED recycling process to identify where emission limits can be reduced. Condition 2.4 has been amended to correct it being overwritten and changed back to refer to efficient use of raw materials.

The schedules specify the changes made to the original permit.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application for permit BU2357	Received 29/08/03	Duly made 16/09/03
Request to extend determination	Request dated 22/12/03	Request accepted 05/01/04
Response to request for information	Request dated 10/03/04	Response dated 14/04/04
Permit BU2357	Issued 14/05/04	Permit for operation of Installation under PPC Regime
Application for Variation AP3634SJ	Received 18/03/05	Duly made 18/03/05
Response to Schedule 7 Notice.	Schedule 7 dated 15/06/05	Response dated 28/07/05
Response to request for further information	Request dated 30/11/05	Response dated 12/12/05
Variation AP3634SJ	Issued 16/12/05	Variation issued to comply with the Waste Incineration (England and Wales) Regulations 2002 (SI 2002 No. 2980) (The WI Regulations) and the Pollution Prevention and Control (Waste Incineration Directive) (England and Wales) Direction 2002
Application for Variation KP3937LZ	Received 04/08/05	Duly made 04/08/05
Additional Information in support of application KP3937LZ	Received 06/11/06	Criteria for fuel switching and commitment to restrict period of gas oil firing
Variation KP3937LZ	Issued 21/11/06	Variation to permit use of gas oil as stand-by fuel when the use of gas is not under economically viable conditions.
Application for Variation AP3338MA	Received 03/11/06	Duly made 03/11/06
Variation PP3831MU	Issued 22/01/07	Variation to establish a revised compliance date for completion of improvement programme reference 1.4.1.8 - performance validation of the continuous emissions monitoring systems
Additional Information in support of application AP3338MA	Received 05/02/07	Options appraisal for air emissions abatement and proposals regarding air emissions monitoring.
Variation AP3338MA	Issued 01/03/07	Variation to permit production of sodium acetate trihydrate
Application for variation EPR/BU2357IP/V009	Received 23/06/08	Duly made 23/06/08
Variation EPR/BU2357IP/V009	Issued 20/08/08	Variation to permit production of synthetic rubbers

Status log of the permit (continued)		
Description	Date	Comments
Variation application EPR/BU2357IP/V010	Received 15/10/12	Administrative variation
Variation EPR/BU2357IP/V010	Issued 19/11/12	
Environment Agency variation determined EPR/BU2357IP/V011	22/03/13	Environment Agency variation to implement the changes introduced by the Industrial Emissions Directive
Variation application EPR/BU2357IP/V012	Duly Made 03/10/13	Variation to remove one point source and amend another to account for a change in process on site
Variation application EPR/BU2357IP/V012 determined	23/12/13	Variation issued

End of introductory note

Notice of variation

Environmental Permitting (England and Wales) Regulations 2010

The Natural Resources Body for Wales ("Natural Resources Wales") in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2010 varies

Permit number
EPR/BU2357IP

issued to:

Warwick International Limited ("the operator")

whose registered office is

C/O Warwick International Group Limited
Mostyn
Holywell
Flintshire
CH8 9HE

company registration number **02386927**

to operate a regulated facility at

Warwick Chemicals
Dock Road
Mostyn
Holywell
Flintshire
CH8 9HE

to the extent set out in the schedules. The notice shall take effect from 23/12/2013.

Name

Date

<i>A.M. Lewis</i>	23/12/2013
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Authorised on behalf of Natural Resources Wales

Schedule 1 – conditions to be deleted

None

Schedule 2 – conditions to be amended

The following conditions are amended as a result of the application made by the operator

Condition 1.4.1 is amended to:

- 1.4.1 The operator shall complete the improvements specified in Table 1.4.1 by the date specified in that table, and shall send written notification of the date of completion of each requirement to Natural Resources Wales within 14 days of the completion of each requirement.

Table 1.4.1 improvement programme		
Reference	Requirement	Date
1.4.1.10	The operator shall, within 6 months of successful plant operation, submit a report in writing to Natural Resources Wales to make a proposal for a reduction in emission limits where changes in processes on site mean actual emissions of substances are far below limits currently in the permit.	To be agreed in writing with Natural Resources Wales
1.4.1.11	The operator shall supply a revised site plan showing the location of all Point Source Emissions.	31/01/14

Condition 2.1.1 is amended to:

- 2.1.1 The Permitted Installation shall, subject to the conditions of this Permit, be operated using the techniques and in the manner described in the documentation specified in Table 2.1.1, or as otherwise agreed in writing by Natural Resources Wales in accordance with conditions 1.5.1 and 1.5.2 of the Permit.

Table 2.1.1: Operating techniques

Description	Parts	Date Received
Application for Permit BU2357	The response to information requirements B2.1 and B2.2 given in pages 16-47 of section 2.1, page 47-70 of section 2.2 and Appendix 9 of the Application	29/08/04
Application for variation AP3634SJ	The response to information requirements C2.1, C2.2, C2.7 and C2.10 given in pages 14-30 of Section 2.1, pages 29-30 of Section 2.2, page 39 of section 2.7, page 42-44 and 50 of section 2.10 of the Application for Variation, and accompanying report Appendix 3 as referenced in these parts of the Application.	18/03/05
Response to Schedule 7 Notice (re Application for variation AP3634SJ)	The response to information requirements 1-4, 6 and 9 of the Notice.	28/07/05
Additional Information (re Application for variation AP3634SJ)	All regarding solid waste arisings, continuous monitoring and emission limits	12/12/05
Application for variation KP3937LZ	The response to information requirements C2.1, 2.2 and C2.3 in section 3.2.4 and section 4 of Application for Variation document reference FSA 06 PJB	04/08/06
Additional Information (re Application for variation KP3937LZ)	Letter dated 03/11/06	06/11/06
Application for Variation AP3338MA	Application under covering letter dated 03/11/06	03/11/06
Additional Information in support of application AP3338MA	Letter dated 01/02/07	05/02/07
Application for variation EA/EPR/BU2357IP/V009	Application for variation	23/06/08
Application for variation EA/EPR/BU2357IP/V012	'AED Recycle Project' (non technical summary), Appendix 1, appendix 2 & appendix 3.	02/10/13

Table 2.2.1 is amended to:

Table 2.2.1 Emission points to air		
Emission point reference or description	Source	Location of emission point
A1	Tank Farm 1 vent	3 metre high stack
A2	Plant 5 caustic scrubber vent	15 metre high stack
A4	Tank Farm 2 vent	3 metre high stack
A5	Filter Dryer plant 2 scrubber vent	26 metre high stack
A6	Silo 1-4 scrubber vent	19 metre high stack
A7	Silo 5-9 scrubber vent	21 metre high stack
A8	EDA bulk storage scrubber vent	12.9 metre high stack
A9a	Granulation 2 system filter vent (white)	16.5 metre high stack
A9b	Granulation 2 system filter vent (coloured)	9.5 metre high stack
A10	Granulation 3 system filter vent	19 metre high stack
A11	Granulation 4 system filter vent	16.5 metre high stack
A12	Warehouse 1 (25 kg bagger unit dust extraction)	2.7 metre high stack
A13	Warehouse 2 (25 kg bagger unit dust extraction)	2.7 metre high stack
A14	Distillation residue incinerator	30 metre high stack
A17	Boiler 201	30 metre high stack
A18	Boiler 202	30 metre high stack
A19	Boiler 301	30 metre high stack
A20	AED recycle plant scrubber	26 metre high stack
A21	Continuous DAED HT fluid heater	27 metre high stack
A22	Continuous DAED 2 plant scrubber vent	26 metre high stack
A23	Continuous DAED storage tanks scrubber vent	26 metre high stack
The locations of the emission points in this table are to be shown on a revised site plan which must be provided as part of improvement condition 1.4.1 in variation notice EPR/BU2357IP/V012		

Table 2.2.2 is amended to:

Table 2.2.2 Emission limits to air and monitoring [other than the incinerator plant]				
Emission point reference	Parameter	Limit (including Reference Period)^{Note 1}	Monitoring frequency	Monitoring method
A2, A5, A6, A7, A20, A22, A23	Acetic acid and anhydride (as Acetic acid)	50 mg m ⁻³ (hourly average)	Quarterly	Spot sample - see Note 2
A9a, A9b, A10, A11, A12, A13	Particulate matter	No visible release	-	-
A17, A18, A19, A21	Oxides of nitrogen (as NO ₂)	170 mg m ⁻³ (hourly average)	Annual	Spot sample - see Note 2
A17, A18, A19, A21	Carbon monoxide	70 mg m ⁻³ (hourly average)	Annual	Spot sample - see Note 2
Note 1: See Condition 6.1.3 [Variation Notice AP3436SJ dated 16/12/05 for reference conditions]				
Note 2. Monitoring methods shall use standards in the following order of priority, unless equivalent methods have been agreed with Natural Resources Wales in writing:				
- Comité Européen de Normalisation (CEN) - British Standards Institution (BSI) - International Standardisation Organisation (ISO) - United States Environmental Protection Agency (US EPA) - American Society for Testing and Materials (ASTM) - Deutsches Institut für Normung (DIN) - Verein Deutscher Ingenieure (VDI) - Association Française de Normalisation (AFNOR)				

Table 2.2.3 is amended to:

Table 2.2.3 Annual limits	
Substance	Limit – kg
Acetic acid (from release points A1-A2, A4-A7, A20, A22, A23)	15,000
Oxides of nitrogen (from release points A14, A17-A19, A21)	40,000

Table S2 is amended as follows:

Table S2 Reporting of monitoring data			
Parameter	Emission point	Reporting period	Period begins
Oxides of nitrogen mg m ⁻³	A17, A18, A19, A21	Every 12 months	1 January each year
Oxides of nitrogen mg m ⁻³	A14	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Oxides of nitrogen (annual mass) kg	A14, A17-A19, A21	Every 12 months	1 January each year
Carbon monoxide mg m ⁻³	A17, A18, A19, A21	Every 12 months	1 January each year
Carbon monoxide mg m ⁻³	A14	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Acetic acid and anhydride (as acetic acid) mg m ⁻³	A2, A5, A6, A7, A20, A22, A23	Every 12 months	1 January each year
Acetic acid (annual mass) kg	A1-A2, A4-A7, A20, A22, A23	Every 12 months	1 January each year
VOCs and Total Organic Carbon (TOC) mg m ⁻³	A14	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Particulate matter mg m ⁻³	A14	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Cadmium and thallium and their compounds (in total) mg m ⁻³	A14	Every 6 months	1 January and 1 July respectively each year
Mercury and its compounds (in total) mg m ⁻³	A14	Every 6 months	1 January and 1 July respectively each year
Sb+As+Pb+Cr+Co +Cu+Mn+Ni+V and their compounds (in total) mg m ⁻³	A14	Every 6 months	1 January and 1 July respectively each year

Table S2 Reporting of monitoring data

Parameter	Emission point	Reporting period	Period begins
Dioxins/furans (I-TEQ) ng m ⁻³	A14	Every 6 months	1 January and 1 July respectively each year
Sulphur dioxide mg m ⁻³	A14	Every 6 months	1 January and 1 July respectively each year
Hydrogen chloride mg m ⁻³	A14	Every 6 months	1 January and 1 July respectively each year
Hydrogen fluoride mg m ⁻³	A14	Every 6 months	1 January and 1 July respectively each year
Dioxin-like PCBs (WHO-TEQ humans/mammals)	A14	Every 6 months	1 January and 1 July respectively each year
Dioxin-like PCBs (WHO-TEQ fish)	A14	Every 6 months	1 January and 1 July respectively each year
Dioxin-like PCBs (WHO-TEQ birds)	A14	Every 6 months	1 January and 1 July respectively each year
Polycyclic Aromatic Hydrocarbons (PAHs)	A14	Every 6 months	1 January and 1 July respectively each year
Chemical oxygen demand mg l ⁻¹	W1	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Chemical oxygen demand kg/day	W1	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Chemical oxygen demand (annual mass) kg	W1	Every 12 months	1 January each year Reported PI 1
Biochemical oxygen demand mg l ⁻¹	W1	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Suspended solids mg l ⁻¹	W1	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Ammoniacal nitrogen mg l ⁻¹	W1	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Total hydrocarbon oil mg l ⁻¹	W1	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Halogenated organic compounds (total as AOX) mg l ⁻¹	W1	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Total cyanides (as HCN) mg l ⁻¹	W1	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year

Table S2 Reporting of monitoring data

Parameter	Emission point	Reporting period	Period begins
Copper mg l ⁻¹	W1	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
pH	W1	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Daily discharge volume m ³	W1	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Tidal period discharge volume m ³	W1	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Rate of discharge l s ⁻¹	W1	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Effluent temperature °C	W1	Every 3 months	1 January, 1 April, 1 July, 1 October respectively each year
Water usage	-	Every 12 months	1 January each year
Energy usage	-	Every 12 months	1 January each year
Waste disposal and/or recovery	-	Every 12 months	1 January each year
Metals (cadmium, thallium, mercury, lead, chromium, nickel, arsenic, cobalt, vanadium, zinc) and their compounds, dioxins/furans and dioxin-like PCBs.	Solid residues (fly ash)	Every 6 months	1 January and 1 July respectively each year
Total soluble fraction and metals (cadmium, thallium, mercury, lead, chromium, copper, manganese, nickel, arsenic, cobalt, vanadium, zinc) soluble fractions	Solid residues (fly ash)	Before use of a new disposal or recycling route	-

Condition 2.4 is amended to:

2.4 Efficient use of raw materials

2.4.1 The operator shall:

- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
- (b) maintain records of raw materials and water used in the activities;
- (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
- (d) take any further appropriate measures identified by a review.

Schedule 3 – conditions to be added

None