

Natural Resources Wales permitting decisions

Variation

We have decided to issue the variation for Warwick Chemicals operated by Warwick International Group Limited.

The variation number is EPR/BU2357IP/V013.

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 environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

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

Structure of this document

- Key issues If applicable see OI/notes below
- Annex 1 the decision checklist
- Annex 2 the consultation, web publicising and newspaper advertising(delete as appropriate) responses

Key issues of the decision

None

Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/ notice.

Aspect considered	Justification / Detail	Criteria met Yes
Operator		
Control of the facility	We are satisfied that the applicant (now the operator) 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	All applicable European directives have been considered in the determination of the application.	✓
The site		
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility including the new emission point A24.	✓
Environmental Risk Assessment and operating techniques		
Operating techniques	We have reviewed the techniques used by the operator as listed in Table 2.1.1: Operating Techniques in the permit.	✓
The permit conditions		
Raw materials	We have specified limits and controls on the use of raw materials and fuels: <ul style="list-style-type: none">• Acetic Anhydride – 670 t/at any one time and 45,000 t/annum;• Ethylene Diamine – 600 t/at any one time and 5,200 t/annum; and• Acetic Acid – 100 t/at any one time and 18,000 t/annum.	✓
Incorporating the application	We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.	✓

Aspect considered	Justification / Detail	Criteria met Yes
	These descriptions are specified in the Operating Techniques table in the permit.	
Emission limits	<p>A new emission point has been installed with regards to this permit as listed in Tables 2.2.1, 2.2.2 and 2.2.3 of the permit. Details are as follow:</p> <ul style="list-style-type: none"> • A24 – Single stream of DAED (28 m stack) with an hourly limit of 50 mg m⁻³ (hourly average) and an annual limit of 15, 000 kg of Acetic Acid. 	✓
Monitoring	<p>To ensure the new vessel and associated vent stack is operating correctly and does not become a designated release point emission, monitoring will be carried out on a weekly basis for the first two months of operation. The sample point will be located in the top section of the vent line.</p> <p>We still maintain that monitoring should be carried out for the remaining emission points as listed in the permit, using the methods detailed and to the frequencies specified</p>	✓
Reporting	We have specified reporting in the permit which now includes reporting of monitoring data of Acetic acid and anhydride (as acetic acid) mg m ⁻³ and Acetic acid (annual mass) kg from emission point A24 every 12 months (from 1 st January every year).	✓
Operator Competence		
Environment management system	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. The decision was taken in accordance with RGN 5 on Operator Competence.	✓
Technical competence	Technical competency is required for activities permitted. The operator is a member of an agreed scheme.	✓
Relevant convictions	The National Enforcement Database has been checked to ensure that all relevant convictions have been declared.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	No relevant convictions were found.	
Financial provision	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.	✓