

Environment Agency Permitting Decisions

We have decided to vary the permit for Amlwch Plastic Works, operated by Rehau Plastics Ltd

[set out in a simple sentence the decision, the site it relates to and the person it relates to. Amend the following information where it is not relevant i.e. for a refusal you have an applicant, no permit number and a proposed location]

The permit number is BX64211Y

The operator is Rehau Ltd

The facility is located at
Unit 8
Amlwch Business Park
Amlwch
Anglesey
LL68 9BX

The decision was effective from 30th May 2008

Summary of the decision

We have decided to grant a permit for the operator, 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.

The "Part A1 installation" (the installation) is located at Amlwch on the Isle of Anglesey.

The installation forms part of the Rehau site, located at National Grid Reference 24411 39255, which manufactures plastic components, including gaskets for refrigerators, hard profiles and edge band strip for the furniture industry. The products are based on polyvinyl chloride (PVC), or a polymer based on acrylonitrile/butadiene/styrene monomers.

The purpose of the installation is to manufacture uPVC profiles, which incorporate lead (Pb) based stabiliser. This manufacturing activity involves dry-blend mixing PVC, lead stabiliser, filler, pigment and impact modifier to produce a compounded PVC powder, which is subsequently extruded into the final plastic profile. The mixing for this activity is carried out on a batch basis in Mixer 1, which has a production capability of 360kg/hr. Mixer 1 is also used on a batch basis to produce plasticised PVC compound with calcium/zinc-based stabiliser, to make soft refrigerator gaskets. This particular activity however is not subject to regulation under this permit.

This variation has been issued following a number of changes on site. The primary changes are to the dry PVC blending operations. The installation will now comprise of 1 manual, 1 semi automatic and 1 fully automated mixers. The manual and fully automated mixers will be primarily serving the edgeband material production, which is regulated via the local authority, under a Part B process

The emission of particulate matter from the mixing process will be minimised by series of abatement techniques prior to discharge via a new emission point.

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;

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;

Key Issues of the decision

Environmental Risk

The changes brought described in the application will ensure the risk of environmental harm from the installation is reduced.

The level of protection offered by the abatement plant serving the point source to air is greatly improved over the standard offered by the previous system.

The risk of fugitive emissions to air affecting the local environment are also reduced, as the operator has improved storage and handling of raw materials. PVC compound. Bulk storage of PVC compound will reduce the handling and storage within bags on site. It will be transferred directly

Improvements to site infrastructure and drainage systems will reduce the risk of damage to the Afon from both point source and fugitive emissions

Conservation

There are no conservation issues as a result of this variation. There will be no increase in emissions to the environment.

Discharges to Surface Water

The company have made a number of changes to the surfacing and drainage systems on site, which form part of the application to vary the permit. The operator has increased the area of hard standing to the rear of the site

Groundwater

The proposed variation will have no impact on groundwater issues in the area. The operator undertook a survey of the groundwater conditions as part of their Site Protection and Monitoring program. No issues were brought to light by this study.

Air Quality

The operator has undertaken a H1 assessment of the particulate emissions from the extraction unit.

A summary of the assessment is included below:

| Subst. | Long term EAL | Short term EAL | Long term PC | %PC of EAL | >1% of EAL | Short term EAL | %PC of EAL | >10% of EAL |
|--------------|---------------|----------------|--------------|------------|------------|----------------|------------|-------------|
| Lead | 0.501 ug/m3 | | 0.000154 | 0.0307 | NO | 0.000154 | -- | -- |
| Particulates | 40 ug/m3 | 50 ug/m3 | 0.137 | 0.341 | NO | 0.137 | 0.273 | NO |

The H1 assessment has classified the emissions from the extractor unit as 'Not significant.'

Modelling of the existing emission point was undertaken in 2005, following the issue of the existing PPC permit. This modelling was based on monitoring obtained from the existing discharge point.
The model indicated that there would be no impact from the emissions to air.

Operational Techniques

The operator has undertaken a BAT assessment as part of the application. We are satisfied that the techniques used by the operator are BAT.

Monitoring and compliance

The operator has installed an number of inductive monitoring devices through out the process, set to alarm in the event of a bag breakthrough, overfilling of the main silo, or any other failure of abatement plant.

The operator will also be installing a triboelectric probe on the extractor discharge. This monitor will alarm and automatically shut down the plant if particulate emissions are elevated. Whilst this method of monitoring is not MCERTS approved, it is installed purely as a warning mechanism rather than as a method of quantifying the releases.

Two emission monitoring points, compliant with BS EN 13284 will be installed on the stack.

The operator has committed to undertaking further emissions monitoring using an MCERTS accredited company.

Operator

Rehau Ltd. Have operated the installation at Amlwch since 1977. The installation has operated under a PPC permit since 2005, with no significant breaches recorded during that time.

The operator operates a Quality and Environmental Management system in accordance with ISO 9001 and ISO14001, which is formally audited by an external auditor

The facility

The variation brings only minor changes to the facility. Additional hardstanding has been laid across site to ensure protection of land and groundwater. The main environmental receptors are perched groundwater within the made ground below the site, and the Afon Goch, which is known to be affected by historical mining activities at Mynydd Parys, upstream of the site.

Commercial and industrial confidentiality

No claims for confidentiality have been made.

ANNEX 1: DECISION CHECKLIST

| Activity | Justification / Detail | Determination criteria met | |
|--|---|----------------------------|-----|
| | | No | Yes |
| Receipt of submission | | | |
| Application fee | The application fee is correct Charge table reference; EP Charges April 2008 | | ✓ |
| Commercial confidentiality | The operator has not made a claim for commercial confidentiality. We have not received any information in relation to this application that appears to be confidential in relation to any party. | | |
| Consultation | | | |
| Scope of consultation | The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, RGN 8 Changes in operation and our Public Participation Statement. Due to the nature of the application, consultation was not required | | ✓ |
| 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 | | ✓ |
| The facility | | | |
| | The regulated facility is an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations and the following directly associated activities. Section 4.2 Part A(1) (d) - Manufacture of polyvinyl chloride plastic profiles using lead based stabiliser | | ✓ |
| 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 A plan is included in the permit at Schedule 2, and the operator is required to carry on the permitted activities within the site boundary. | | ✓ |
| Site condition report | The operator has provided a description of the condition of the site which we consider is satisfactory. The decision was taken in accordance with our guidance The decision was taken in accordance with our guidance on site condition reports – guidance and templates TGN5. This report was submitted with the original application | | ✓ |
| Environmental Risk Assessment and operating techniques | | | |
| 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 | We have reviewed the techniques used by the operator and compared these with the relevant guidance notes 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 | The permit contains many conditions taken from our permit template. We developed these conditions in consultation with industry having regard to the | | ✓ |

| Activity | Justification / Detail | Determination criteria met | |
|--|--|----------------------------|-----|
| | | No | Yes |
| from the template | <p>relevant legislation. This decision document does not include an explanation for these usual conditions.</p> <p>Where such conditions are imposed we have considered the application and accepted the details are sufficient and satisfactory to control that aspect of the operation.</p> | | |
| Odour alternative conditions | No odour conditions required | | ✓ |
| Noise alternative conditions | No further Noise conditions required | | ✓ |
| Raw materials | No restrictions on raw materials required | | ✓ |
| Waste types | No waste is accepted on site | | ✓ |
| Pre-operational conditions | Based on the information on the application, we consider that we do not need to impose pre-operational conditions. | | ✓ |
| Conditions where the consent of another person is needed | Not applicable | | ✓ |
| Incorporating the application | <p>[Only include this where parts of the application have been incorporated]</p> <p>We have specified that the applicant must operate his installation in accordance with the following descriptions in his application.</p> | | ✓ |
| Emission limits | <p>The following substances have been identified as being emitted in significant quantities and equivalent parameters or technical measures [based on BAT] have been set for those substances</p> <p>It is considered that the ELVs/ equivalent parameters or technical measures described above will ensure that significant pollution of the environment is prevented and a high level of protection for the environment secured</p> | | ✓ |
| Monitoring | <p>We have decided that monitoring should be carried out for the parameters listed in the relevant tables in the original permit (BX64211Y) using the methods and to the frequencies specified in those tables.</p> <p>Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.</p> | | ✓ |
| Reporting | The monitoring and reporting requirements as specified in the original permit remain unchanged by this variation | | ✓ |
| Operator Competence | | | |
| Technical competence | <p>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.</p> <p>The decision was taken in accordance with RGN 5 on Operator Competence</p> | | ✓ |
| Relevant Convictions | The National Enforcement Database has been checked to ensure that all relevant convictions have been declared. The operator satisfies the criteria in RGN 5 on Operator Competence | | ✓ |

| Activity | Justification / Detail | Determination criteria met | |
|---------------------|---|----------------------------|-----|
| | | No | Yes |
| 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. | | ✓ |
| OPRA | | | |
| Opra Score | The Opra score is 50 The Opra score has not changed from that set out in the application. | | |

ANNEX 2: CONSULTATION RESPONSES

Advertising and consultation

It was not deemed necessary to consult on this variation application.