APPLICATION FOR AN ENVIRONMENTAL PERMIT VARIATION UNDER THE ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2016 (AS AMENDED)

NON-TECHNICAL SUMMARY

Industrial Waxes Limited

ABRIL INDUSTRIAL WAXES LIMITED,
STURMI WAY, VILLAGE FARM INDUSTRIAL ESTATE,
PYLE, BRIDGEND, CF33 6BZ

ECL Ref: AIWL.01.01/NTS
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ACRONYMS/TERMS USED IN THIS REPORT

Abril	**Abril Industrial Waxes Limited**
BAT	**Best Available Techniques**
EA	**Environment Agency**
ECL	**Environmental Compliance Limited**
EMS	**Environmental Management System**
EP Regulations	**Environmental Permit Regulations**
EP	**Environmental Permit**
ERA	**Environmental Risk Assessment**
LEV	**Local Exhaust Ventilation**
LII	**Low Impact Installation**
NGR	**National Grid Reference**
OS	**Ordnance Survey**
The Installation	**Area contained within the Environmental Permit boundary at Abril Industrial Waxes Limited**
VOC	**Volatile Organic Compounds**

1. INTRODUCTION

1.1. Project Overview

1.1.1. This Application (and its associated supporting documentation) has been prepared on behalf of Abril Industrial Waxes Limited ("Abril") by Environmental Compliance Limited ("ECL") and relates to the Environmental Permit ("EP") variation application for their site located at Sturmi Way, Village Farm Industrial Estate, Pyle, Bridgend, CF33 6BZ ("the Installation").

1.1.2. Abril was formed in 1945 and incorporated in 2003. Part of the Hoganas A.B. Group out of Sweden, Abril is a producer of amide waxes and other wax blends for industrial applications.

1.1.3. The Installation is located on Sturmi Way, within an industrial estate and heavily industrial site setting area, to the northwest of Bridgend town centre. The Installation occupies an approximate area of 1,200m^2 and is centred on National Grid Reference ("NGR") SS 83118 82213.

1.1.4. Figure 1 provides the indicative location of the Installation (red outline) within the context of the surrounding environment.

Figure 1: Indicative Site Location

2. PROPOSED ACTIVITIES

2.1. New Process Line

2.1.1. As part of site changes to production, Abril is proposing to install a new process line which will necessitate additional raw materials and a new emission point to air (to be designated A16).

2.1.2. In addition, alongside the new production line, Abril are proposing to install two holding tanks under the reaction vessels at the Installation. These holding tanks would hold finished product wax and have an atmospheric air vent per tank to prevent pressure buildup when filling. These new proposed emission points would be numbered A17 and A18.

2.1.3. A process flow diagram of the Installation's operations, covering the existing and the new process, is provided as Appendix I.

2.1.4. The new raw material (i.e., a diamine – provided as Baxxodur EC 280 or similar) is delivered to the Installation in drums. As the used drums are removed from the site as hazardous waste, the Installation can no longer be classed as a Low Impact Installation ("LII") and an EP variation is therefore required.

2.1.5. There will be no change to the Installation's Schedule 1 Activity as a result of this variation application.

3. ENVIRONMENTAL MANAGEMENT TECHNIQUES

3.1. Overview

3.1.1. Abril will operate an Environmental Management System ("EMS") at the Installation which will address environmental aspects of the proposed activities.

3.1.2. Abril's EMS is externally certified to ISO 14001 for their existing operations at the site. The EMS will be reviewed to take account of the variation to ensure it remains appropriate and effective.

4. EMISSIONS AND MONITORING

4.1. Overview

4.1.1. There is one point source emission point to air proposed as part of this EP variation. This is designated A15 and detailed on the Drawings, which have been provided in Section 5 of this application submission.

4.1.2. The proposed activity does not involve discharging any hazardous chemicals or elements to surface water, foul water or land.

4.2. Monitoring

4.2.1. It is understood that a carbon filter will be fitted to the local exhaust ventilation ("LEV") system associated with A16. The purpose of the carbon filter will be to minimise any releases of volatile organic compounds ("VOCs") to atmosphere. It is anticipated that daily inspections of the filter and emission point to air will be undertaken in accordance with Best Available Techniques ("BAT") and reported at the frequency to be specified by NRW. The filter will be replaced when required.

4.2.2. It should be noted that as proposed emission points A17 and A18 will solely be present to avoid any overpressure of the product storage holding tanks, it is considered that there will be negligible emissions associated with them. Consequently, these emission points will not need to be factored into the H1 air emissions risk assessment.

4.2.3. A H1 air emissions risk assessment was undertaken (a copy of which is contained in Section 6 of this application submission), which concluded that the impacts associated with the operation of the proposed release point to air are not considered to be significant.

5. GENERAL REQUIREMENTS

5.1. Environmental Risk Assessment

5.1.1. The Environmental Risk Assessment ("ERA") (provided in Section 4 as part of this application submission) has demonstrated that none of the risks relating to the proposed changes will be significant if operations are managed in accordance with the detailed risk management measures and EMS.

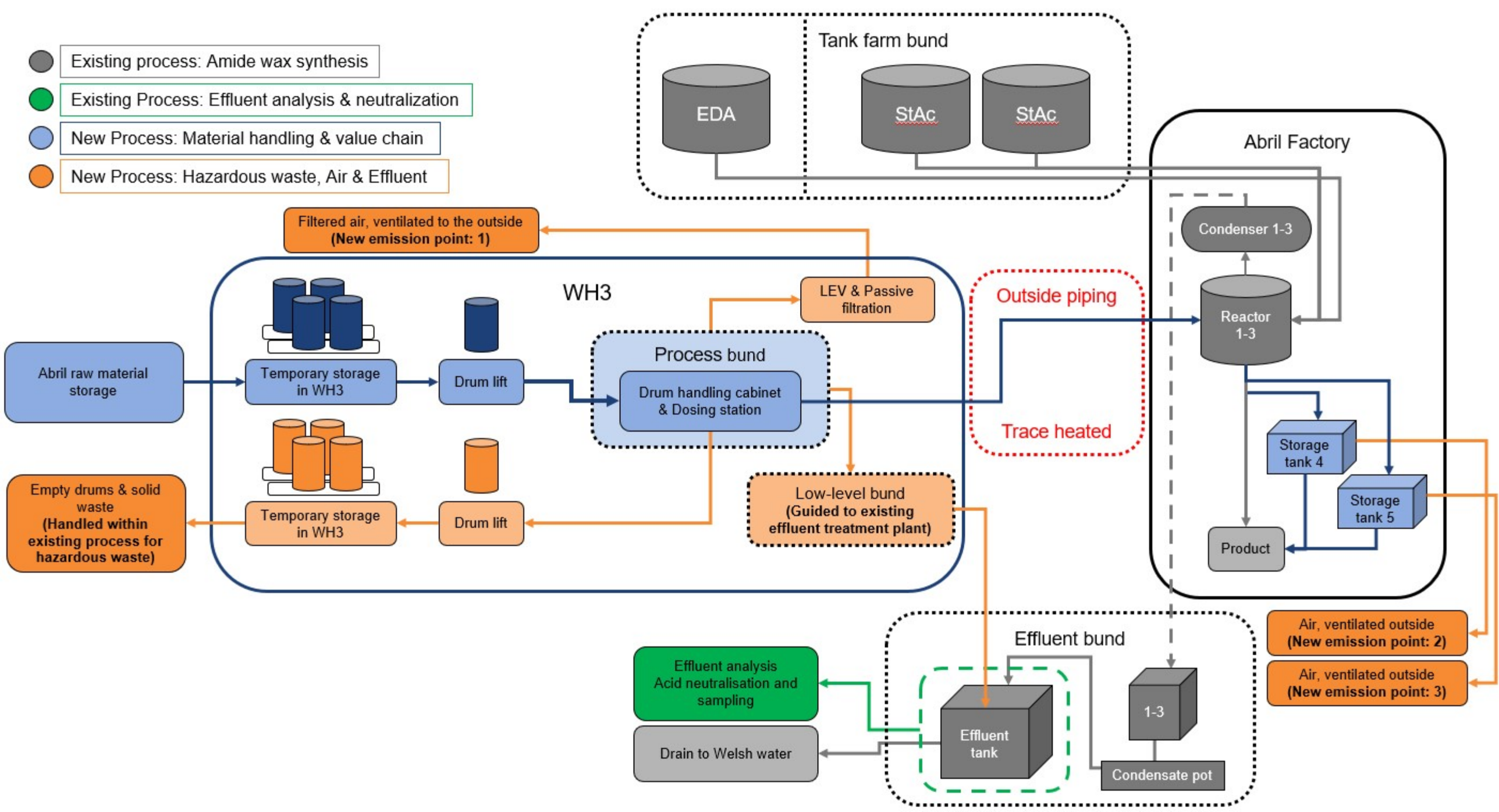
6. BEST AVAILABLE TECHNIQUES ASSESSMENT

6.1. Overview

6.1.1. BAT requirements have been taken from the Large Volume Organic Chemicals BREF (December 2017) as it covers Installations associated with the production of organic chemicals. These BAT conclusions apply without prejudice to other relevant legislation, such as health and safety.

6.1.2. It is considered that the techniques that will be in use will constitute BAT and will be appropriate and proportionate for the scale of the activities and the risks that are posed to the environment by these activities.

APPENDIX I
PROCESS FLOW DIAGRAM


Existing process: Amide wax synthesis
Existing Process: Effluent analysis & neutralization
New Process: Material handling & value chain
New Process: Hazardous waste, Air & Effluent
Tank farm bund
EDA
StAc
StAc
Abril Factory
Filtered air, ventilated to the outside
(New emission point: 1)
WH3
LEV & Passive filtration
Condenser 1-3
Outside piping
Reactor 1-3
Abril raw material storage
Temporary storage in WH3
Drum lift
Process bund
Drum handling cabinet & Dosing station
Trace heated
Storage tank 4
Storage tank 5
Product
Empty drums & solid waste
(Handled within existing process for hazardous waste)
Temporary storage in WH3
Drum lift
Low-level bund
(Guided to existing effluent treatment plant)
Effluent bund
Air, ventilated outside
(New emission point: 2)
Air, ventilated outside
(New emission point: 3)
Effluent analysis
Acid neutralisation and sampling
Drain to Welsh water
Effluent tank
1-3
Condensate pot