

Natural Resources Wales Permitting Decisions

Abril Industrial Waxes Limited. (Abril Industrial Waxes)

Decision Document

Application for a Normal Variation

The application number is: PAN-026655

The permit variation number is: EPR/BV5858IW/V005

The operator is: Abril Industrial Waxes Limited

The Installation is located at: Abril Industrial Waxes, Sturmi Way, Village Farm, Industrial Estate, Pyle, Bridgend, CF33 6BZ

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.

Contents

Contents	3
Glossary of acronyms and definitions used in this document	5
1. Executive summary	6
1.1. Application summary.....	6
1.2. Our decision.....	6
2. Receipt of the application	7
3. Confidential information	7
4. Legislation.....	7
5. Consultation	9
6. Requests for information	9
7. The Installation.....	10
7.1. The permitted activities	10
7.2. Changes to the installation.....	10
8. Operation of the installation	11
8.1. Operator competence	11
8.2. Environmental Management System	11
8.3. Operating techniques.....	12
9. The site	13
9.1. Site Plan.....	13
9.2. Site Condition Report.....	13
9.3. Site protection: potentially polluting substances and prevention measures ...	13
10. Environmental Risk Assessment	14
10.1. Assessment of impact on air quality	15
10.2. Assessment of impact to surface and ground water	16
10.3. Emissions to sewer	16
10.4. Fugitive emissions.....	16
10.5. Assessment of odour impact	17
10.6. Noise and vibration assessment.....	18
11. Impact on National Site Network Sites, SSSIs and non-statutory sites	18
11.1. The National Site Network.....	19
11.2. Sites of Special Scientific Interest (SSSI).....	19
11.3. Non-statutory conservation sites	20
12. The Permit Conditions	21
12.1. Updating permit conditions during consolidation	21
12.2. Incorporating the variation	21

12.3.	Emission Limits	21
12.4.	Monitoring.....	22
12.5.	Reporting.....	22
12.6.	Raw Materials.....	22
12.7.	Improvement conditions	23
13.	OPRA	23
ANNEX 1:	Improvement Conditions	24

Glossary of acronyms and definitions used in this document

BAT-Best Available Techniques

BRef- BAT Reference document

EPR- Environmental Permitting Regulations 2016 (as amended)

HRA-Habitats Regulations Assessment

IED-Industrial emission Directive 2010

LEV- Local exhaust ventilation

LII- Low impact installation

LVOC- Large Volume Organic Chemicals BAT

NRW-Natural Resources Wales

OFC- Organic Fine Chemicals BAT

PC - Process contributions

PEC-Predicted environmental concentrations

PM10 - Particulate matter that has a diameter of 10 µm

PM2.5 – Particulate matter that has a diameter of 2.5 µm

RGN- Regulatory guidance note

SAC -Special Area of Conservation

SSSI- Site of Special Scientific Interest

WFD- Waste Framework Directive

1. Executive summary

1.1. Application summary

Abril Industrial Waxes Limited are varying their permit (EPR/BV5858IW) to add a new production line to their site located at Sturmi Way, Pyle. The new production line will utilise the diamine (3,3'-(butane-1,4- diylbis(oxy))bispropaneamine) as a raw material for the production of waxes.

The variation will result in new emission points to air from the drum handling local exhaust ventilation (LEV) (emission point A16) and pressure release vents from holding tank (emission points A17-A18) but the production capacity of the site will not increase.

As a result of the new production line and the increase in hazardous waste generated from the waste barrels, the site will exceed the 10 tonnes per year hazardous waste limit for a Low Impact Installation (LII) and therefore the site can no longer meet the LII criteria and is now a normal bespoke installation.

The variation also adds emission points A14 and A15 into the permit. These were previously add through minor operational change but were not present in the permit.

1.2. Our decision

We have decided to issue the variation for Abril Industrial Waxes operated by Abril Industrial Waxes Limited.

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.

2. Receipt of the application

The application was received on 14/08/2024. In order for us to be able to consider the application duly made, we needed more information. We requested the following:

- Description and a flow diagram of the proposed new production line.
- Consideration in the environmental risk assessment if any of the additional emission points pose an risk of odorous emissions (channelled or fugitive)
- Confirmation of what standards the containment bunds are (or will be) built to.

A letter requesting this information was sent to the applicant on 28/04/2025. Upon receipt of this information, on 06/05/2025, we were able to consider the application duly made. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

3. Confidential information

The applicant made a claim for no claim for commercial confidentiality, and we have not received information in relation to the application that appears to be confidential in relation to any party.

4. Legislation

The variation will be issued under Regulation 20 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the IED;
- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed.

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that the decision on this application is consistent with its general purpose of pursuing the sustainable management of natural resources

(SMNR) in relation to Wales and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent significant damage to ecosystems. We consider that, in issuing the variation a high level of protection will be delivered for the environment and human health through the operation of the Installation in accordance with the permit conditions. NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources.

As the EPR regulator for Part A1 installations in Wales, NRW are required to determine any duly made Part A1 permit applications. This means that we must decide either to grant, or to refuse the variation based upon an objective assessment of the proposals against the detailed legal requirements of EPR. Our public participation statement¹ gives more information on what can, and cannot, be taken into account when making our permitting decision.

The application, and this decision document, only considers the permitting of the facility under EPR as described throughout the document. We only assess the installation and its impacts and cannot take into consideration indirect impacts which are not as a direct result of activity within the installation boundary.

Any proposed development and wider associated activities will be required to be compliant with all relevant and applicable law, for example, environmental law, health and safety law, planning law. This other legislation acts largely independently of EPR (although they may be inter-related). Such other matters are beyond both the scope of this document, and of our regulatory remit and expertise and are not relevant to our EPR permitting decision. Ensuring compliance with all other regulation and obtaining any required consents (such as planning permission) is the responsibility of those undertaking the development and is regulated by the relevant appropriate authority for each.

¹ [Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations](#)

5. Consultation

No consultation has been carried out on this application as the variation was deemed a normal variation (and not a substantial) and as such consultation was not required for this site.

This decision was made in accordance the Environment Permitting Regulations (EPR), our statutory Public Participation Statement² and our Regulatory Guidance.

6. Requests for information

Further information was requested during determination by way of a Schedule 5 Notice requiring the applicant to provide further information relating to best available techniques (BAT). The operator had assessed their site against BAT the Large Volume Organic Chemicals (LVOC) BAT conclusions. However we determined that this BAT would not sufficiently cover the site as it is applicable to sites that produce 20 kilo tonne or more per year, whereas Abril only produces less than 4.5 kilo tonnes. As such we asked the applicant to assess against Organic Fine Chemicals (OFC) BAT as this was more applicable for a site of this scale.

The Schedule 5 Notice was sent on 03/07/2025 with a deadline for response of 25/07/2025 (Extended to the 08/08/2025). The applicant's response to the Schedule 5 Notice was provided on 05/08/2025. The additional information supplied satisfied the requirements of the Schedule 5 Notice.

Several informal information requests were also made via email. These related to the following

- Query on emission points to air – A14 and A15

A copy of the information notice(s) and e-mails requesting further information were placed on our public register as were the responses when received.

² [Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations](#)

7. The Installation

7.1. The permitted activities

The regulated facility is currently an LII which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations:

- A1 - Section 4.1 Part A1 (a) Producing organic chemicals such as- (iv) organic compounds containing nitrogen
- A2 - Section 4.1 Part A1(a) Producing organic chemicals such as- (ii) organic compounds containing oxygen
- A3 - Section 4.2 Part A1(a) Producing inorganic chemicals such as— (i) gases (production of nitrogen)

7.2. Changes to the installation

The variation will add a new production line that will use a new diamine (3,3'-(butane-1,4- diylbis(oxy))bispropaneamine (referred to as diamine in this document) as a raw material in the production of waxes. This production will fall under the site's the existing primary activity (reference A1 in Table S1.1 of the permit) Section 4.1 Part A1 (a). This EPR activity does not have a threshold (which can be exceeded) the deemed a normal variation in line with our guidance (RGN 8) ³.

The variation will include the storage of the new diamines on site located within a dedicated storage area and additional emission points to air from the diamine storage and passive vents.

The site had previously been operated to the low impact installation criteria. However the empty drums that are used for the new diamines are classed as hazardous waste. Because of this, the site can no longer achieve the less than 10 tonnes of hazardous waste threshold for a low impact installation. As such the site has now been varied to a non-low impact installation, with the relevant permit conditions added to the consolidated permit.

³ [Substantial changes in operation at installations, mining waste facilities and other facilities involving solvent and combustion](#)

8. Operation of the installation

8.1. Operator competence

The applicant is the sole operator of the Installation. We are satisfied that the applicant is the person who will have control over the operation of the Installation the variation is issued; and that they will be able to operate the Installation so as to comply with the conditions included in the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator⁴.

8.2. Environmental Management System

The operator has stated in the application that they will implement an Environmental Management System (EMS) that will meet the requirements for an EMS in our “How to comply with your environmental permit” guidance⁵

The operator has an existing environment management system which is accredited to ISO 14001. The operator has submitted a summary of the amendments to their EMS to reflect the operational changes as a result of the new production line. We have reviewed these and are satisfied that appropriate management systems and management structures will be in place for this Installation, and that sufficient resources are available to the Operator to ensure compliance with all the Permit conditions.

Accident management

The EMS includes an Accident Management Plan which the applicant has submitted as part of this application. We have reviewed this and are satisfied that appropriate controls are in place to help reduce the occurrence and impact of any accidents that occur.

In order to ensure that the management system proposed by the applicant sufficiently manages the residual risk of accidents, permit condition 1.1.1a requires the

⁴ [RGN 1 Understanding the meaning of 'operator' \(naturalresources.wales\)](#)

⁵ [Natural Resources Wales / Guidance to help you comply with your environmental permit](#)

implementation of a written management system which addresses the pollution risks associated with, amongst other things, accidents.

8.3. Operating techniques

Installation activities and assessment of Best Available Techniques

The applicant has described the proposed equipment and operating techniques and compared these against the relevant Best Available Techniques conclusions (BATc).

The applicant had initially used the Large Volume Organic Chemicals (LVOC). However during the determination it was deemed that the Organic Fine Chemicals (OFC) BRef was a more applicable BAT for a site of this scale than LVOC, as LVOC is primarily for sites that produce >20 K tonnes per year where as Abril Industrial Waxes operates less than 4.4 K tonnes per year in a batch process.

The operator re-assessed their proposal against the OFC. We have reviewed the techniques proposed and consider them to represent BAT at this installation.

We have specified that the applicant must operate the permit in accordance with descriptions in the application. See section 12 of this document for more information on how we have incorporated the application/variation into the permit and how emission limit values have been set.

Efficient use of raw materials, water and energy

Having considered the information submitted in the application, we are satisfied that the applicant will ensure that raw materials, water and energy is used as efficiently as possible.

The operator will be required to report energy usage under condition 4.2 and Schedule 4 of the permit. The following parameters are required to be reported;

- energy usage
- water usage

- total raw material used.

This will enable us to monitor energy recovery efficiency at the Installation.

Avoidance, recovery or disposal of wastes produced by the activities

Having considered the information submitted in the application, we are satisfied that the waste hierarchy referred to in Article 4 of the Waste Framework Directive (WFD) will be applied to the generation of waste and that any waste generated will be treated in accordance with this Article.

We are satisfied that waste from the Installation that cannot be recovered will be disposed of offsite using a method that minimises any impact on the environment. Permit condition 1.4.1 of the permit will ensure that this position is maintained.

9. The site

9.1. Site Plan

The applicant has provided an updated plan which we consider is satisfactory, showing the extent of the site of the facility and its emission points including the new emission points to air.

The updated plan will be included in the permit and the operator will be required to carry on the permitted activities within the site boundary.

9.2. Site Condition Report

The proposal does not include the addition of any land and so a Site Condition Report was not required to support this application.

9.3. Site protection: potentially polluting substances and prevention measures

The operator has a duty to ensure that soil and groundwater are protected in order to meet the requirements of Articles 14 (1)(b), 14(1)(e) and 16(2) of the IED.

The new activity will involve the storage of the diamines which are potentially polluting liquids. As such these need to be stored in a dedicated area with suitable secondary and tertiary containment.

The operator has outlined that the bund will be built to CIRIA 736 specifications and that they will use an external consultant to complete a full CIRIA 736 assessment to determine the suitability of the bund. The hazardous substances are stored in drums inside the bunded area. The bunded area is located indoors.

Based upon the information in the application we are satisfied appropriate measures will be in place to protect the site and its surroundings from polluting substances.

10. Environmental Risk Assessment

Regulated activities can present different types of risk to the environment. These include odour, noise and vibration; accidents, fugitive emissions to air and water; as well as point source releases to air, water, sewer and discharges to ground or groundwater, global warming potential and generation of waste. All these factors have been considered during the determination and the relevant risks from this proposal are discussed in this and other sections of this document.

The next sections of this document explain how we have approached the critical issue of assessing the likely impact of emissions from the Installation on human health and the environment and what measures we are requiring ensuring a high level of protection.

In line with our guidance, the applicant has provided an environmental risk assessment with the application which identifies and the sources of key risks from the installation / variation, possible pathways and receptors. This risk assessment and further assessments provided by the applicant and/or completed by NRW will be discussed in further detail below.

10.1. Assessment of impact on air quality

This section of the decision document deals primarily with the emissions to air from the drum handling LEV (Emission point A16) stack and its impact on local air quality.

The applicant has assessed the Installation's potential emissions to air against the relevant air quality standards, and the potential impact upon human health in line with relevant guidance⁶. These assessments predict the potential effects on local air quality from the Installation's LEV emission.

The applicant has calculated process contributions (PC) and predicted environmental concentrations (PEC) at locations within the immediate vicinity and all identified sensitive receptor locations. The H1 generic risk assessment results for each pollutant will be discussed separately below.

Emissions of the diamines from the LEV (Point A16) assessed against the thresholds of monoethanolamine which have a long-term critical level of 100 µg/m³ (annual) and short term critical level of 400 µg/m³ (hourly). At point source the maximum predicted long-term PC was <1 % of the long-term critical level and the short term PC was < 10% of the short term critical level. Therefore, in accordance with the relevant guidance the long-term and short term impacts from diamine can be considered as insignificant.

Emission points A14 and A15 had been previously assessed and agreed by the local operations team under a minor operational changes (condition 1.5 in the original permit that allowed minor changes if it is demonstrate negligible risk) in April 2019 on the basis that the H1 assessment showed these emission points screened out as insignificant.

The H1 assessment undertaken for this assessed the emissions of particulate matter PM₁₀ and PM_{2.5}. and demonstrated that these emissions of these from A14 and A15 screened out as insignificant.

⁶ [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit)

Another H1 submitted for this variation also showed that PM₁₀ and PM_{2.5} from all emission points screened out as insignificant.

We have incorporated emission point A14 and A15 has been incorporated into the permit through this variation.

Emission limits

We have not set new emission limits for A14-A18. See section 12.3 for more details.

10.2. Assessment of impact to surface and ground water

There is no direct discharge to surface water other than uncontaminated rain water runoff. The variation will not change any of the existing discharge.

10.3. Emissions to sewer

All process effluent is discharge to sewer under an existing trade effluent consent. The operator had shown copies of correspondence between them and their sewer undertaker to demonstrate that the variation would not impact their compliance with the trade effluent consent.

We are satisfied that the new production line will not result in an increase over the existing permitted emission limits in the trade effluent consent/existing permit.

Emission limits

There has been no change to the sewer discharge limits outlined in the permit.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent pollution of surface waters as a result of the sewer discharge.

10.4. Fugitive emissions

The applicant has identified the following potential fugitive emissions in their environmental risk assessment:

- Emissions to ground
- Emissions to surface water drainage

The application details measures which will be in place for preventing and minimising fugitive emissions.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise fugitive emissions and to prevent pollution from fugitive emissions.

Permit condition 3.2.1 requires that emissions of substances not controlled by emission limits (i.e., fugitive emissions) shall not cause pollution. Condition 3.2.2 requires that a management plan shall be developed if pollution is subsequently identified.

10.5. Assessment of odour impact

There are sensitive receptors within the vicinity of the installation with the nearest receptor being located

The applicant has identified the following sources of odour in their environmental risk assessment:

- Fugitive emissions from local exhaust ventilation.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where not practicable to minimise the effects of odour.

Condition 3.3.1 in the permit will also require that emissions from the activities are free from odour at levels likely to cause pollution outside the site. We are satisfied that this will be sufficiently protective in conjunction with the measures described by the applicant for minimising odour at the installation.

10.6. Noise and vibration assessment

There are sensitive receptors within the vicinity of the installation, with the nearest sensitive receptor located approximately 80 metres north of the site.

The operator had identified and assessed the risk of noise impact from the production activities in their environmental risk assessment.

Most of the activities occur indoors and the site is located within an industrial estate. Given the scale of the changes to the site and the risk/actions outlined in the submitted risk assessment the changes to the site are not likely to cause any increase risk of noise impact from the site at the nearest sensitive receptors.

We are satisfied that vibration is unlikely to be an issue at the installation. The nature of the activity means that there are no significant sources of vibration on site. Therefore, vibration does not need to be included in the management plan.

Conditions 3.4.1 of the permit requires noise from the activities to be below that which could cause pollution outside the site. We are satisfied that this will be sufficiently protective in conjunction with the measures described by the applicant for minimising noise at the installation.

11. Impact on National Site Network Sites, SSSIs and non-statutory sites

The applicant has used the relevant screening distance criteria to identify relevant protected conservation sites which could be at risk from the proposal. The screening distances used were 10 km for National network sites and 2 km for Sites of Special Scientific Interest (SSSI) and non-statutory conservation sites.

We are in agreement with the screening distances used.

A full assessment of the variation application and its potential to affect the identified sites identified has been carried out as part of the permit determination process.

National Site Network sites, Sites of Special Scientific Interest (SSSI) and non-statutory conservation sites will be discussed separately below.

11.1. The National Site Network

The following National Site Network sites are located within 10 km of the installation:

- Glaswelltiroedd Cefn Cribwr / Cefn Cribwr Grasslands - Special area of conservation (SAC)
- Kenfig / Cynffig - SAC
- Blackmill Woodland - SAC

A Habitat Regulations Assessment (HRA) was completed to assess the potential to affect any of the sites identified. The project was screened for likelihood of significant effects and is considered not likely to have a significant effect on any National Site Network site (as documented in section 3.2 of OGN 200 Form 1, or section 5 if applicable). The full assessment is available to view on the public register.

11.2. Sites of Special Scientific Interest (SSSI)

The following SSSIs are located within 2 km of the installation:

- Stormy Down
- Penycastell, Cefn Cribwr
- Cynffig / Kenfig
- Waun Cimla

As a Section 28G Authority as defined in the Countryside Rights of Way Act 2000 permitting teams within NRW has a legal duty, under Section 28I of the Wildlife and Countryside Act 1981, to consult with NRW for formal advice when permitting an activity which has been determined to be likely to damage the features of a SSSI.

To determine if consultation is required, a SSSI Assessment was completed. The assessment concluded that the proposed permission is not likely to damage any of the flora, fauna or geological or physiological features which are of special interest.

A copy of the assessment is available to view on the public register.

11.3. Non-statutory conservation sites

The following relevant non-statutory sites are located within 2 km of the installation:

2 local nature reserves

- Frog Pond Wood
- Bedford Park

14 local wildlife sites:

- North-Eastern Dunes
- Waunbant Road (triangle)
- Ty Tanglwst Wood
- Mynydd Bach
- Waunbant Road (north)
- Eastern Frog Pond Wood
- Old Ballas Wood
- St. James' Church Wood
- Stormy Down
- Frog Pond Wood
- Bedford Park
- Afon Cynffig
- North of Pyle
- Cornelly Quarry

There are also 25 designated ancient woodlands within the screening distance.

The only impact pathway from the proposed variation that could cause risk to the sites is the emissions of the diamines to air from one of the new emission points (A16). The new diamine does not have an environmental standard for ecological but given the H1 screening tool used for human health assessments (see section 10) shows the quantity being emitted from the site are low concentrations at point source, the emissions are unlikely to cause any risk of impact to the features of the sites.

Based upon the information in the application we are satisfied that there will be no adverse impact to the non-statutory conservation sites identified.

12. The Permit Conditions

12.1. Updating permit conditions during consolidation

We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation. The site will also now be subject to additional permit conditions as a result of becoming a normal installation and will no longer operate under the low impact installation conditions and operating techniques.

The operator has agreed that the new conditions are acceptable.

12.2. Incorporating the variation

We have specified that the applicant must operate the permit in accordance with descriptions in the application, including additional information received as part of the determination process.

These descriptions have been specified in the Operating Techniques table (Table S1.2) in the permit.

12.3. Emission Limits

We have added 5 new emission points to the permit A14-A18 as a result of this variation, as follows:

- A14 and A15 were previously assessed but had not been listed in the permit.
- A16 is new channelled emission to air of diamines from the LEV extraction from the drum handling system.
- A17 and A18 are passive vents from two tanks that will hold the final wax products to prevent pressure buildup.

We have not set emission limits as these emission points are either local exhaust ventilation (A14 and A16) for the purposes of worker health and safety or are passive vents (A15, A17-A18) to prevent the build up of pressure.

We have also removed four emission points from the permit A1, A11 and A13 as these emission points are no longer in use.

12.4. Monitoring

We have decided that monitoring should be carried out for the parameters listed in Schedule 3 of the permit using the methods and to the frequencies specified in those tables. These monitoring requirements have been imposed in order to demonstrate compliance with the emissions limits in the permit.

We have not put any additional monitoring requirements to the emission points A16-A18 as these are local exhaust ventilation and passive emission points.

We have added annual particulate matter monitoring for A14 in line with the reporting for the emission points.

12.5. Reporting

We have specified the reporting requirements in Schedule 4 of the Permit to ensure data is reported to enable timely review by Natural Resources Wales to ensure compliance with permit conditions and to monitor the efficiency of material use and waste recovery at the installation.

As the site is no longer a low impact installation, the site will be required to report in line with the new permit conditions and reporting tables in schedule 4 of the permit.

There are no changes to reporting forms for emissions to air. All other reporting forms will use a new template.

12.6. Raw Materials

We have not put specified limits and controls on the use of raw materials and fuels.

12.7. Improvement conditions

Based on the information on the application, we consider that we need to impose improvement conditions. Details of the improvement conditions used can be found at Annex 1

We have put in this improvement condition (IC2) for the operator to measure pre-abated emissions from the drum handling area to validate the H1 risk assessment on the diamine (3,3'-(butane-1,4- diylbis(oxy))bispropaneamine.

We have incorporated this improvement condition in Table S1.2 of the permit.

13. OPRA

As the site is no longer a low impact installation, the annual subsistence will be based on the site's OPRA score. The agreed OPRA score at the installation is 95. This will form the basis for ongoing subsistence fees.

ANNEX 1: Improvement Conditions

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC2	The operator must undertake monitoring of pre-abatement emissions of volatile organic emissions from the drum handling area to validate the H1 air risk assessment (AIWL.01.01_H1 (Air) - Issue 1).	Within three months of commissioning of emission point A16

End of Document