

Natural Resources Wales permitting decisions

Electrical Carbon, Swansea Morganite Electrical Carbon Limited Decision Document

Contents

Variation	3
The variation number is: EPR/VP3339PD/V012	3
The operator is: Morganite Electrical Carbon Limited	3
The Installation is located at: Upper Fforest Way, Morriston, Swansea Enterprise Park, SA6 8PP	3
Purpose of this document	4
Key issues of the decision	5
Receipt of application	5
Confidential information	5
Identifying confidential information	5
Consultation	5
The facility	5
Legislation	6
The site	6
Site condition report	6
Biodiversity, Heritage, Landscape and Nature Conservation	6
Environmental Risk Assessment	6
Air	7
Water	8
Odour	8
Noise	9
Fugitive emissions	9
Monitoring	9
Reporting	9
The permit conditions	10
Incorporating the application	10
Environment management system	10
Relevant convictions	10
OPRA	10
Amended permit conditions	11

Variation

The variation number is: EPR/VP3339PD/V012

The operator is: Morganite Electrical Carbon Limited

The Installation is located at: Upper Fforest Way, Morriston, Swansea Enterprise Park, SA6 8PP

We have decided to issue the variation for Electrical Carbon, Swansea operated by Morganite Carbon Limited.

The variation is to change the abatement for the emission point A15. The new abatement is a horizontal deep bed filter which is to replace the wet scrubber that had previously used as abatement for this emission point. The new abatement plant also replaces the stack reducing the stack height from 12 meters to 4 meters. As a result, the variation has reduced the emission limit value of particulate matter and Benzo-a-pyrene for A15 from 5 mg/Nm³ and 0.01mg/Nm³ (respectfully) to 4 mg/Nm³ and 0.005 mg/Nm³.

Conditions 3.1.1, 3.5.1 and 3.5.4 have also been updated to removed the reference to table S3.3 which was removed as part of a previous variation (V010).

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.

Key issues of the decision

Receipt of application

The original variation application (PAN-011026) had been submitted as a minor technical variation but was found that more information was needed to fully determine the application and the assessment required was more than was needed for a minor technical variation. As such the application was returned and the applicant resubmitted (PAN-013064) as a normal variation.

Confidential information

No claim for commercial or industrial confidentiality has been made.

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.

Consultation

Consultation was not required for this variation. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.

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 6.2 A(1)(a) Carbon Activities – Production of carbon by means of graphitisation

- Section 4.2 A(1)(c)(vi) Inorganic chemicals – Manufacturing activity involving the use of Lead

Legislation

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

All applicable European directives have been considered in the determination of the application.

The site

There are no changes to the site boundary as a result of this variation.

Site condition report

There is no change to the site as a result of this variation.

Biodiversity, Heritage, Landscape and Nature Conservation

The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.

A full assessment of the application and its potential to affect the habitats has been carried out as part of the permitting process. We consider that the application will not affect the features of the habitat.

An Appendix 4 assessment was carried out for the site of special scientific interest (SSSI) and a Habitat regulatory assessment (HRA) form 1 was completed and sent to environment teams.

Environmental Risk Assessment

Published by:
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

0300 065 3000 (Mon-Fri, 8am - 6pm)

enquiries@naturalresourceswales.gov.uk
www.naturalresourceswales.gov.uk

© Natural Resources Wales

All rights reserved. This document may be reproduced with prior permission of Natural Resources Wales

Issued 18th June 2021

Page 6 of 11

Air

This section of the decision document deals primarily with the dispersion modelling of emissions to air from the 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. These assessments predict the potential effects on local air quality from the Installation's stack emission.

The air impact assessments, and the dispersion modelling has been based on the Installation operating continuously at the relevant long-term or short-term emission limit values, i.e. the maximum permitted emission rate.

We are in agreement with this approach. The assumptions underpinning the model have been checked and are reasonably precautionary. The way in which the Applicant used dispersion models, its selection of input data, use of background data and the assumptions it made have been reviewed by Natural Resources Wales modelling specialists to establish the robustness of the Applicant's air impact assessment. The output from the model has then been used to inform further assessment of health impacts.

Initial air quality assessment using the H1 tool showed a potential increase in process contribution (localised concentration) for the new abatement plant due to the decrease in stack height. The applicant therefore proposed to decrease the emission limit values

Emission limits

We have decided that emission limits should be set for the parameters listed in the permit.

The following substances have been identified as being emitted in significant quantities and ELVs or equivalent parameters or technical measures based on BAT have been set for those substances.

We have imposed a stricter ELV in respect of benzo-a-pyrene and particulate matter because the relevant environmental quality standard requires this.

Due to the decrease of the stack height as a result of the new abatement plant, the H1 assessment was showing an increase in process contribution from the new abatement plant. The applicant proposed lowering the ELVs for the emission point (A15) to the compensate for the decreased stack height and lower the process contribution for benzo-a-pyrene on the new emission stack compared to the wet scrubber.

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.

Water

There are no changes to water discharge as a result of this variation

Emission limits

There are no changes to the ELV for water discharge as a result of this variation

Odour

There are no changes to the variation that would affect odour from the site.

Noise

We consider that the activities carried out at the site have the potential to cause noise and/or vibration that might cause pollution outside the site and consider it appropriate to impose specific measures.

The applicant submitted a report showing the new abatement plant results in a noise reduction (of 24 dB at the site boundary) over the old wet scrubber. We agree with this assessment.

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.

Monitoring

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.

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.

The variation changes the ELV for benzo-a-pyrene and particulate matter for A15 however the monitoring techniques and frequencies for A15 remain unchanged. The monitoring for all other emission points remain unchanged.

Reporting

There is no change to the reporting format as a result of this variation.

The permit conditions

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.

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

These sections include details regarding the design of the new abatement plant and the techniques used to maintain the abatement plant including the how frequently the applicant has to change the carbon filter to ensure that the abatement plant meets the emission limit values.

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.

Relevant convictions

Our Enforcement Database has been checked to ensure that all relevant convictions have been declared.

No relevant convictions were found.

The operator satisfies the criteria in RGN 5 on Operator Competence.

OPRA

The OPRA score at permit issue remains at 74.

Amended permit conditions

As part of the variation conditions 3.1.1, 3.5.1 and 3.5.4 were updated to remove references to Table s3.3 (discharge to sewer) which had been removed in a previous variation (VP3339PD/V010).

Published by:
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

0300 065 3000 (Mon-Fri, 8am - 6pm)

enquiries@naturalresourceswales.gov.uk
www.naturalresourceswales.gov.uk

© Natural Resources Wales

All rights reserved. This document may be reproduced with prior permission of Natural Resources Wales

Issued 18th June 2021

Page 11 of 11