



**ENVIRONMENT
AGENCY**

Variation Notice with introductory note

Pollution Prevention and Control Regulations 2000

**EnviroWales Ltd.
Rassau Recycling Facility
Rassau Industrial Estate
Ebbw Vale
Blaenau Gwent
NP23 5SD**

Variation Notice number

EP3439LB

Permit number

EP3230BW

Introductory note

This introductory note does not form a part of the Variation Notice.

The following Notice is issued under Regulation 17 of The Pollution Prevention and Control (England and Wales) Regulations 2000 (S.I.2000 No. 1973 (as amended) (the Regulations) to vary the conditions of a Permit issued under the Regulations to operate [part of] an installation.

The Notice comprises Schedule 1 containing conditions to be deleted, Schedule 2 conditions to be amended and Schedule 3 conditions to be added. The Notice is subject to the express conditions set out in Schedules 1 to 3.

The Permit, as amended by this Variation Notice, contains conditions which have to be complied with. It should be noted that aspects of the operation of the installation which are not regulated by those conditions are subject to the condition implied by Regulation 12(10) of the PPC Regulations, that the Operator shall use the best available techniques for preventing or, where that is not practicable, reducing emissions from the installation. Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Brief description of the changes introduced by this variation notice.

The main purpose of the activities at the installation is:-

Recycling of lead-acid batteries to produce metallic lead for re-sale and re-use.

In the original permit, lead smelting activities were to be undertaken in a single rotary furnace of 10m³ (45 tonnes nominal capacity) and the scrap melting and refining kettles, fired by natural gas burners, were to each have a combustion stack associated with them.

In order to maintain operational flexibility, particularly with regard to different operational conditions for processing lead paste, the requirement for two 5m³ furnaces instead of the single, larger furnace was identified. There will not be an additional release point required, as both furnaces will vent through release point A2 via separate bag filter abatement. There are separate banks of bag filters for each furnace merging to the single stack, which under normal operation will operate in tandem. However, if necessary, both furnaces can be vented through a single bank of filters as there is sufficient capacity designed into the arrangement to achieve the same attenuation of emissions.

Similarly the change from four smaller combustion stacks to a single stack serving the scrap melting kettle and refining kettles gas burner array is proposed to give improved dispersion characteristics of the combustion gases and increased ease of maintenance. As a result of this change, four release points (A5-A8) of 15m in height will be varied to a single release point of 21m in height, designated A5.

An additional release point to sewer is added through this variation. S1 will now service the foul domestic effluent from amenity blocks on the site, whilst the new release point, S2, will service the treated effluent from the on-site effluent treatment plant.

Atmospheric dispersion modelling and an H1 assessment have been carried out using the proposed operational revisions which demonstrate no negative environmental impact as a result of these changes.

Other PPC Permits relating to this installation		
Permit holder	Permit Number	Date of Issue
None	-	-

Superseded Licenses/Consents/Authorisations relating to this installation		
Holder	Reference Number	Date of Issue
None	-	-

Talking to us

If you contact the Agency about this Permit please quote the Permit Number.

The Operator should use the Emergency Hotline telephone number (0800 80 70 60) or any other number notified to it to give a notification under condition 5.1.1 of the Permit.

Confidentiality

The Permit/Variation requires the Operator to provide information to the Agency. The Agency will place the information onto the public registers in accordance with the requirements of the PPC Regulations. If the Operator considers that any information provided is commercially confidential, it may apply to the Agency to have such information withheld from the register as provided in the PPC Regulations. To enable the Agency to determine whether the information is commercially confidential, the Operator should clearly identify the information in question and should specify clear and precise reasons.

Variations to the permit

This Permit may be varied in the future. The Status Log within the Introductory Note to any such variation will include summary details of the Permit, variations issued up to that point in time and state whether a consolidated version of the Permit has been issued.

Surrender of the permit

Before this Permit can be wholly or partially surrendered, an application to surrender the Permit has to be made. For the applicant to be successful, they would have to be able to demonstrate to the Agency, in accordance with Regulation 19 of the PPC Regulations, that there is no pollution risk and that no further steps are required to return the site to a satisfactory state.

Transfer of the permit or part of the permit

Before the Permit can be wholly or partially transferred to another person, a joint application to transfer the Permit has to be made by both the existing and proposed holders, in accordance with Regulation 18 of the PPC Regulations. A transfer will be allowed unless the Agency considers that the proposed holder will not be the person who will have control over the operation of the installation or will not ensure compliance with the conditions of the transferred Permit. If the Permit authorises the carrying out of a specified waste management activity, then there is a further requirement that the transferee is considered to be a "fit and proper person" to carry out that activity.

Status Log

Detail	Date	Comment
Application EP 3230 BW	Received 12/09/04	Duly Made 13/10/04
Response to request for information	Request dated 21/12/04	Response dated 17/01/05
Request to extend determination	Request dated 22/02/05	Request accepted 23/02/05
Response to request for information	Request dated 03/03/05	Response dated 15/03/05
Request to extend determination	Request dated 23/03/05	Request accepted 24/3/05
Request to extend determination	Request dated 06/04/05	Request accepted 06/04/05
Permit determined	26/04/05	
Application for variation	Received 23/12/05	Duly Made 16/01/06
Variation EP3439LB	Determined 28/04/06	Change from one 10m ³ Rotary Furnace to two 5m ³ Rotary Furnaces. Change to single release point for combustion products from Refining Kettle burners.

End of Introductory Note

Variation Notice

Pollution Prevention and Control
(England and Wales) Regulations 2000



**ENVIRONMENT
AGENCY**

Variation Notice

Permit number (**The Permit**)

EP3230BW

Variation Notice number

EP3439LB

The Environment Agency in exercise of its powers under Regulation 17 of the Pollution Prevention and Control (England and Wales) Regulations 2000 (S.I. 2000 No. 1973) (as amended), hereby varies the Permit issued on 26/4/05 and held by you.

EnviroWales Ltd. ("the Operator"),

Whose Registered Office is

7a Nevil Street

Abergavenny

Monmouthshire

NP7 5AA

Company registration number 4296277

which relates to the operation of Installation at

Rassau Recycling Facility, Plateaux 1 & 2, Rassau Industrial Estate, Ebbw Vale, Blaenau Gwent, NP23 5SD

to the extent set out in Schedules 1 to 3 of this Variation Notice.

This Notice shall take effect from **28th April 2006 at 00.01 hours.**

Signed

A rectangular box containing a handwritten signature in black ink, which appears to be "N. Allen".

Dr Norman Allen

Authorised to sign on behalf of the
Environment Agency

Date

27th April 06

SCHEDULE 1 - CONDITIONS TO BE DELETED

1. None

SCHEDULE 2 - CONDITIONS TO BE AMENDED

2. Condition IC11 in Table 1.4 to be amended to

Table 1.4.1: Improvement programme

Reference	Requirement	Date
IC11	<p>Subject to monitoring results for the pollutants listed below from points S1 and S2 exceeding Indicative BAT Benchmark concentrations, the following shall apply.</p> <p>The Operator shall submit a report in writing to the Agency reviewing the options for reducing the emissions of the pollutants listed below so they shall not exceed the Indicative BAT benchmark concentration indicated as standard conditions;</p> <ul style="list-style-type: none">i) BOD 10 mg l⁻¹ii) Lead and its compounds (as Pb) 5 mg l⁻¹iii) Cadmium and its compounds (as Cd) 0.25 mg l⁻¹iv) Mercury and its compounds (as Hg) 0.125 mg l⁻¹v) Arsenic and its compounds (as As) 2.5 mg l⁻¹vi) Zinc and its compounds (as Zn) 12.5mg l⁻¹vii) Total hydrocarbon oil 2mg l⁻¹	01/01/2007

The report must not only assess abatement options, but bias towards prevention at source through the supply chain and procurement, especially all rogue battery types and the effectiveness of the pre-sorting activity prior to battery breaking. If one of the options represents BAT the report shall contain a timetable for implementation by **30th June 2007**.

3. Table 2.2.1 to be amended to

Table 2.2.1 : Emission points to air

Emission point reference or description	Source	Location of emission point
A1	<i>Wet scrubber abatement serving Battery Breaking</i>	<i>Point A1 on site plan</i>
A2	<i>Bag filter abatement plant serving Rotary Furnaces RF1 and RF2</i>	<i>Point A2 on site plan dated 10/04/06</i>
A3	<i>Bag filter abatement plant serving Refining Kettles RK1-3 and Scrap Melting Kettle SK1</i>	<i>Point A3 on site plan</i>
A4	<i>Bag filter abatement plant serving Slag Treatment and storage area</i>	<i>Point A4 on site plan</i>
A5	<i>Oxy-gas burners stack for Scrap Melting Kettle SK1 and Refining Kettles RK1, RK2 & RK3.</i>	<i>Point A5 on site plan dated 10/04/06</i>
A6	<i>Sodium Carbonate silo</i>	<i>Point indicating A6 on site plan dated 10/04/06</i>
A7	<i>Sodium Carbonate silo</i>	<i>Point indicating A7 on site plan dated 10/014/06</i>

Table 2.2.2 : Emission limits to air and monitoring

Emission point reference	Parameter	Limit (including Reference Period) ¹	Monitoring frequency	Monitoring method Note 2.
A1	Sulphuric Acid mist mg Nm⁻³	1.00 6 Monthly extractive sample	Twice a year	US EPA Method 8
	Minimum interval between extractive monitoring		4 months	
A2	Lead and compounds taken together (as metal) mg Nm⁻³	2.00	Quarterly	BS EN 14385:2004
A3		Monthly average and quarterly extractive sample		
A4				
A1	Total Particulate mg Nm⁻³	5.00	Quarterly	BS EN 13284-1:2002
A2		Monthly AMS (CEM) average and quarterly extractive sample		
A3		10.00	Continuous	ISO 10155:1995
A4		Maximum daily average provided monthly AMS (CEM) value is met.		
A2	Sulphur Dioxide mg Nm⁻³ (Natural Gas Fuel)	500.00	Quarterly	BS 6069-4.4:1993
A3		Monthly AMS (CEM) average and quarterly extractive sample		
		500.00 Maximum daily average provided monthly AMS (CEM) value is met.	Continuous.	BS 6069-4.4:1993
A5	Sulphur Dioxide mg Nm⁻³ (Natural Gas Fuel)	50.00 6 Monthly extractive sample	Twice a year	BS 6069-4.4:1993
	Minimum interval between extractive monitoring		4 months	
A2	Hydrogen Chloride mg Nm⁻³	10.00	Quarterly	BS EN 1911-1:1998
A3		Quarterly extractive sample		
A1	Cadmium and compounds taken together (as element) mg Nm⁻³	0.5	Quarterly	BS EN 14385:2004
A2		Quarterly extractive sample		
A3				
A4				

A1	Copper, lead, nickel, zinc and their compounds taken together (as metal) mg Nm⁻³	2.00		Quarterly	BS EN 14385:2004
A2		Quarterly	extractive		
A3		sample			
A4					
A1	Antimony, tin, tellurium and their compounds taken together (as element) mg Nm⁻³	2.00		Quarterly	BS EN 14385:2004
A2		Quarterly	extractive		
A3		sample			
A4					
A1	Cadmium, arsenic, thallium, selenium, and their compounds taken together (as element) mg Nm⁻³	0.5		Quarterly	BS EN 14385:2004
A2		Quarterly	extractive		
A3		sample			
A4					
	Mercury (as element) mg Nm⁻³	0.5		Quarterly	BS EN 13211:2001
		Quarterly	extractive		
		sample			
A2	Dioxins and Furans (ITEQ) ng Nm⁻³	0.1		Twice a year	BS EN 1948-1:1997 Parts 1 to 3
A3		6 Monthly extractive sample (minimum 4 hours, maximum 8 hours)			
		Minimum interval between extractive monitoring		4 Months	
A2	Oxides of Nitrogen mg Nm⁻³	100.00		Quarterly	ISO 10849:1996
A3		Monthly AMS (CEM) average and extractive sample			
A5		200.00 Maximum daily average provided monthly AMS (CEM) value is met.		Continuous	ISO 10849:1996
A2	Carbon Monoxide mg Nm⁻³	150.00		Quarterly	ISO 12039:2001
A3		Monthly AMS (CEM) average and extractive sample			
A5		300.00 Maximum daily average provided monthly AMS (CEM) value is met.		Continuous	ISO 12039:2001
A2	Volatile Organic Compounds (as Carbon) mg Nm⁻³	50.00		Quarterly	BS EN 12619:1999 or BS EN 13526:2001
A3		Monthly AMS (CEM) average and extractive sample			
A5					

		100.00	<i>Continuous</i>	<i>BS EN</i>
		<i>Maximum</i>	<i>daily</i>	<i>12619:1999 or</i>
		<i>average</i>	<i>provided</i>	<i>BSEN 13526:2001</i>
		<i>monthly AMS (CEM)</i>		
		<i>value is met.</i>		
A6	Particulate	<i>No visible emission³</i>	<i>When</i>	
A7			<i>unloading</i>	
			<i>bulk</i>	
			<i>Sodium</i>	
			<i>Carbonate</i>	

Note 1: See Section 6 for reference conditions

Note 2: Monitoring methodology shall have regard to the current methods as described in Technical Guidance Note (Monitoring) M2 as periodically revised or as previously agreed in writing with the Agency.

Note 3: For these release points only, a particulate emission concentration limit of 10mg/m³ is appropriate for this type of cartridge filter abatement. However, the Environment Agency recognises that it is neither practicable, nor beneficial to test small individual filters. The Operator is therefore required generally to ensure that visible emissions of dust are prevented, or in the event of a visible emission, that such steps are taken as to minimise the release, and that prompt inspection and maintenance is carried out as soon as practicable. Operating instruction shall state visual observations are taken during unloading of bulk lime or sodium carbonate.

4. Condition 2.2.2.7 to be amended to

2.2.2.7 Emissions to sewer from the specified emission points in Table 2.2.7 shall only arise from the source(s) specified in that Table.

Table 2.2.7 Emission points to sewer

Emission point reference or description	Source	Sewer
S1 (WD1 on drawing S4.4122-23(a))	<i>Mainly foul domestic sewage from amenity areas.</i>	<i>Welsh Water plc</i>
S2 (S2 on drawing 04122-201 and drawing dated 10/4/2006)	<i>Effluent treatment plant taking process waters from site process operations.</i>	<i>Welsh Water plc</i>

5. Condition 2.2.2.8 to be amended to

2.2.2.8 The limits for the emissions to sewer for the parameter(s) and emission point(s) set out in Table 2.2.8 shall not be exceeded.

Table 2.2.8 : Emission limits and monitoring frequency to sewer

Emission point reference	Substance	Limit (including Reference Period)	Monitoring frequency		Monitoring method Note 4.
S1, S2	Flow m ³ day ⁻¹	150 Daily average	Continuous		To be agreed in writing with the Agency prior to commencement of measurement.
	Biological Oxygen Demand mg litre ⁻¹	10.0 Weekly average	Weekly		BS EN 1899-2 (BOD ₅)
	Suspended Solids mg litre ⁻¹	400 Weekly average	Weekly made up of samples	composite of daily	SCA Blue Book 105 ISBN 011751957X
	Hydrocarbon Oil mg litre ⁻¹	No visible staining	Weekly made up of samples	composite of daily	-
	pH max	11	Continuous		ISO 10523:1994 or BS 6068-2.50:1995
	pH min	6	Continuous		ISO 10523:1994 or BS 6068-2.50:1995
	Sulphate mg litre ⁻¹	2000 Weekly average	Weekly made up of samples	composite of daily	SCA Blue Book 136 ISBN 0117522406
	Antimony and its compounds (as Sb) mg litre ⁻¹	2.5 Weekly average	Weekly made up of samples	composite of daily	BS ISO 17294-2:2003 or BS 6068-2.89:2003
	Arsenic and its compounds (as As) mg litre ⁻¹	2.5 Weekly average	Weekly made up of samples	composite of daily	BS ISO 17294-2:2003 or BS 6068-2.89:2003
	Cadmium and its compounds (as Cd) mg litre ⁻¹	0.25 Weekly average	Weekly made up of samples	composite of daily	BS ISO 17294-2:2003 or BS 6068-2.89:2003
	Copper and its compounds (as Cu) mg litre ⁻¹	12.5 Weekly average	Weekly made up of samples	composite of daily	BS ISO 17294-2:2003 or BS 6068-2.89:2003
	Lead and its compounds (as Pb) mg litre ⁻¹	5.0 Weekly average	Weekly made up of samples	composite of daily	BS ISO 17294-2:2003 or BS 6068-2.89:2003
	Mercury and its compounds (as Hg) mg litre ⁻¹	0.125 Weekly average	Weekly made up of samples	composite of daily	BS EN 13506:2002 or BS 6069-2.74:2002
	Nickel and its compounds (as Ni) mg litre ⁻¹	12.5 Weekly average	Weekly made up of samples	composite of daily	BS ISO 17294-2:2003 or BS 6068-2.89:2003
	Zinc and its compounds (as Zn) mg litre ⁻¹	12.5 Weekly average	Weekly made up of samples	composite of daily	BS ISO 17294-2:2003 or BS 6068-2.89:2003

Note 4: Monitoring methodology shall have regard to the current methods as described in Technical Guidance Note (Monitoring) M18 as periodically revised or as previously agreed in writing with the Agency.

6. Schedule 2 - Reporting of monitoring data to be amended to

Parameters for which reports shall be made, in accordance with conditions 4.1.2 and 4.1.3 of this Permit, are listed below.

Parameter	Emission point	Reporting period	Period begins
Sulphuric Acid mist mg Nm ⁻³	A1	Every 6 months	1 st day of quarter in which operations commence
Lead and compounds taken together (as metal) mg Nm ⁻³	A2, A3, A4	Quarterly	1 st day of quarter in which operations commence
Total Particulate mg Nm ⁻³	A1, A2, A3, A4	Quarterly	1 st day of quarter in which operations commence
Sulphur Dioxide mg Nm ⁻³ (Smelting)	A2, A3,	Quarterly	1 st day of quarter in which operations commence
Sulphur Dioxide mg Nm ⁻³ (Natural Gas Fuel)	A5,	Every 6 months	1 st day of quarter in which operations commence
Hydrogen Chloride mg Nm ⁻³	A2, A3	Quarterly	1 st day of quarter in which operations commence
Cadmium and compounds taken together (as element) mg Nm ⁻³	A1, A2, A3, A4	Quarterly	1 st day of quarter in which operations commence
Copper, lead, nickel, zinc and their compounds taken together (as metal) mg Nm ⁻³	A1, A2, A3, A4	Quarterly	1 st day of quarter in which operations commence
Antimony, tin, tellurium and their compounds taken together (as element) mg Nm ⁻³	A1, A2, A3, A4	Quarterly	1 st day of quarter in which operations commence
Cadmium, arsenic, thallium, selenium, and their compounds taken together (as element) mg Nm ⁻³	A1, A2, A3, A4	Quarterly	1 st day of quarter in which operations commence
Mercury (as element) mg Nm ⁻³			
Dioxins and Furans (ITEQ) ng Nm ⁻³	A2, A3,	Every 6 months	1 st day of quarter in which operations commence
Oxides of Nitrogen mg Nm ⁻³	A2, A3, A5	Quarterly	1 st day of quarter in which operations commence
Carbon Monoxide mg Nm ⁻³	A2, A3, A5,	Quarterly	1 st day of quarter in which operations commence
Volatile Organic Compounds (as Carbon) mg Nm ⁻³	A2, A3, A5,	Quarterly	1 st day of quarter in which operations commence
Particulate Visible emission Y/N?	A6, A7	Quarterly	1 st day of quarter in which operations commence
Flow m ³ day ⁻¹	S1, S2	Quarterly	1 st day of quarter in which operations commence
Biological Oxygen Demand mg litre ⁻¹	S1, S2	Quarterly	1 st day of quarter in which operations commence

Suspended Solids mg litre ⁻¹	S1, S2	Quarterly	1st day of quarter in which operations commence
Hydrocarbon Oil	S1, S2	Quarterly	1st day of quarter in which operations commence
pH max	S1, S2	Quarterly	1st day of quarter in which operations commence
pH min	S1, S2	Quarterly	1st day of quarter in which operations commence
Sulphate mg litre⁻¹	S1, S2	Quarterly	1st day of quarter in which operations commence
Antimony and its compounds (as Sb) mg litre⁻¹	S1, S2	Quarterly	1st day of quarter in which operations commence
Arsenic and its compounds (as As) mg litre⁻¹	S1, S2	Quarterly	1st day of quarter in which operations commence
Cadmium and its compounds (as Cd) mg litre⁻¹	S1, S2	Quarterly	1st day of quarter in which operations commence
Copper and its compounds (as Cu) mg litre⁻¹	S1, S2	Quarterly	1st day of quarter in which operations commence
Lead and its compounds (as Pb) mg litre⁻¹	S1, S2	Quarterly	1st day of quarter in which operations commence
Mercury and its compounds (as Hg) mg litre⁻¹	S1, S2	Quarterly	1st day of quarter in which operations commence
Nickel and its compounds (as Ni) mg litre⁻¹	S1, S2	Quarterly	1st day of quarter in which operations commence
Zinc and its compounds (as Zn) mg litre⁻¹	S1, S2	Quarterly	1st day of quarter in which operations commence
Water usage		Annually	1st January 2006.
Energy Usage		Annually	1st January 2006.
Waste disposal and/or Recovery		Annually	1st January 2006.
Performance Indicators		Annually	1st January 2006.
Quarterly Substance Report		Quarterly	1st day of quarter in which operations commence

7. Schedule 3 - Forms to be used shall be amended to

Table S3: Reporting Forms		
Media / parameter	Form Number	Date of Form
<i>Air</i>	<i>A1, A2, A3</i>	<i>28/04/06</i>
<i>Water (excluding sewer)</i>	<i>W1</i>	<i>26/04/05</i>
<i>Sewer</i>	<i>S1</i>	<i>28/04/06</i>
<i>Energy</i>	<i>E1</i>	<i>26/04/05</i>
<i>Waste Return</i>	<i>R1</i>	<i>26/04/05</i>
<i>Water usage</i>	<i>WU1</i>	<i>26/04/05</i>
<i>Performance indicators</i>	<i>PI1</i>	<i>26/04/05</i>
<i>Quarterly Substance reports</i>	<i>SC1</i>	<i>26/04/05</i>

SCHEDULE 3 - CONDITIONS TO BE ADDED

8. None

END OF VARIATION