

Variation notice with introductory note

Environmental Permitting (England & Wales) Regulations 2007

EnviroWales Ltd.

Rassau Recycling Facility
Rassau Industrial Estate
Ebbw Vale
Blaenau Gwent
NP23 5SD

Variation notice number
EA/EPR/EP3230BW/V004

Permit number
EP3230BW

Rassau Recycling Facility Permit Number EP3230BW

Introductory note

This introductory note does not form a part of the permit

The following notice, which is issued pursuant to regulation 20 and Part 1 of Schedule 5 of the Environmental Permitting (England and Wales) Regulations S.I.2007 No. 3538 (the Regulations), gives notice of the variation of an environmental permit to operate a regulated facility.

The main purpose of the activities at the installation is for the recycling of lead-acid batteries and lead bearing waste scrap to produce metallic lead for re-sale and re-use.

The variation is for;

- a) amendments to the timetable for the improvement item programme
- b) amendments to Table 2.2.7, 2.2.8, Schedule 2

Schedule 1 of this notice lists any deleted conditions, Schedule 2 lists any amended conditions and Schedule 3 lists any conditions that have been added.

| Status Log of the permit | Date | Comment |
|--|--|---|
| <i>Application</i> EP 3230 BW | <i>Received</i> 12/09/04 | <i>Duly Made</i> 13/10/04 |
| <i>Response to request for information</i> | <i>Requests dated</i> 21/12/04, 03/03/05 | <i>Responses dated</i> 17/01/05, 15/03/05 |
| <i>Request to extend determination</i> | <i>Requests dated</i> 22/02/05, 23/03/05, 06/04/05 | <i>Requests accepted</i> 23/02/05, 24/3/05, 06/04/05 |
| <i>Permit determined</i> | 26/04/05 | |
| <i>Application for variation</i> EP3439LB | <i>Received</i> 23/12/05 | <i>Duly Made</i> 16/01/06 |
| <i>Variation notice</i> EP3439LB issued | 28/04/06 | <i>Change from one 10m³ Rotary Furnace to two 5m³ Rotary Furnaces. Change to single release point for combustion products from Refining Kettle burners.</i> |
| <i>Response from operator</i> | 25/11/08 | <i>Response with comments dated</i> 25/11/08 |
| <i>Variation notice</i> EPR/EP3230BW/V004 issued | 9/1/09 | <i>EA instigated variation –purpose; to amend improvement item timetable .</i> |

Other Part A installation permits relating to this installation

| Operator | Permit Number | Date of Issue |
|----------|---------------|---------------|
| None | - | - |

End of Introductory Note

Notice of variation

**Environmental Permitting
(England and Wales) Regulations 2007**

Permit number

EP3230BW

The Environment Agency in exercise of its powers under Regulation 20 of the Environmental Permitting (England and Wales) Regulations 2007 (SI 2000 No 3538) varies the permit as set out below.

EnviroWales Ltd. ("the Operator"),

Whose Registered Office is

7a Nevil Street

Abergavenny

Monmouthshire

NP7 5AA

Company registration number 4296277

to operate an installation/part of an 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.

The notice shall take effect from; 9th January 2009

Signed

| Name | Date |
|---|------------------------------|
|  | 9 th January 2009 |

Tony Leakey

Authorised on behalf of the Environment Agency

Schedule 1 – conditions to be deleted

1. None.

Schedule 2 – conditions to be amended

2. The following conditions are amended as follows

1. Table 1.4.1 shall be amended as follows;

| Table 1.4.1: Improvement programme | | |
|------------------------------------|--|--|
| Reference | Requirement | Date |
| IC1 | The Operator shall submit in writing to the Agency, a decommissioning plan in accordance with the BAT requirements in Section 2.11 of TGN 2.03. | 1/7/2009 |
| IC2 | The Operator shall provide an implementation plan for the full transfer of maintenance programmes and records to a computer-based system within 6 months of start-up. | 31/12/2009 |
| IC3 | The Operator shall have in place an externally audited Environmental Management System having regard to section 2.1 of the IPPC Sector guidance S2.03 or other Technical Guidance, by the date specified. | 31/12/2010 |
| IC4 | The Operator shall submit a report, in writing, to the Agency reviewing the techniques for continuous measurements for emissions to Air for heavy metals, particularly Lead and Cadmium including cost, availability, accuracy and detection limits. If the report identifies improvement that represent BAT, the report shall contain a timetable for implementing, by 1/9/2009 the improvements identified. | 1/3/2009 |
| IC5 | The Operator shall report the results of compliance tests for the Rotary Furnace Slag against the UK Waste Acceptance Criteria for Hazardous Waste to the Agency on a quarterly basis. The first report shall be due by the date specified and every three months thereafter. | Report Complete. Requirement transferred to Schedule 2; (Quarterly reporting) |
| IC6 | The Operator shall submit a report, in writing, to the Agency reviewing the techniques for continuous measurements for emissions to controlled water and sewer, for suspended solids and heavy metals, particularly Lead and Cadmium including cost, availability, accuracy and detection limits. If the report identifies improvements that represent BAT, the report shall contain a timetable for implementing, by 31/12/2009 the improvements identified. | 1/7/09 |
| IC7 | The Operator shall submit a report on the likely concentration and mass release of dioxins and furans into air, water and onto land from the permitted activity. The report shall also contain a timetable for reducing, by 1/3/2010 emissions of dioxins and furans if the techniques for reduction represent BAT. | 1/09/2009 |
| IC8 | The Operator shall submit a report, which identifies and quantifies all sources of fugitive emissions from the installation. The report shall describe the environmental impact of fugitive releases and their significance. In particular, fugitive emissions within the charging area shall be investigated and the report shall contain proposals for reducing fugitive emissions within this area if the techniques for reduction represent BAT. The Operator shall submit a report which specifies a timetable for implementation by 31/12/2009 to prevent, or where that is not practicable, reduce the fugitive emissions within the installation. | 1/7/2009 |
| IC9 | Further detailed dispersion modelling using actual emissions data from the process, shall be carried out for substances that are significant and priority to control, namely NO _x , SO _x , particulates as PM _{2.5} and ₁₀ , lead and cadmium, compared to relevant environmental benchmarks. The report shall be submitted to the Agency by the date specified. Prior to actual modelling, a report in writing shall be submitted to the Agency covering the modelling proposals and technical parameters using Appendix E of IPPC H1 Horizontal Guidance note, for acceptance by the Agency to ensure robust modelling that is fit for purpose. | 31/12/2009 |

| | | |
|------|--|------------|
| IC10 | <p>Subject to monitoring results for the pollutants listed below from points A1, A2, A3 and A4 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) Lead 2 mg Nm-3 ii) Particulate as PM10 5 mg Nm-3 iii) Copper, lead, nickel and their compounds (as metal) 2 mg Nm-3 iv) Antimony, tin and tellurium and their compounds (as metal) 2 mg Nm-3 v) Cadmium, arsenic mercury, thallium and selenium and their compounds (as metal) 0.5 mg Nm-3 vi) Dioxins (ITEQ) 0.1 ng Nm-3 <p>If one of the options represents BAT the report shall contain a timetable for implementing that option by 31/12/2009. 31/3/2010</p> | 1/09/2009 |
| IC11 | <p>Subject to monitoring results for the pollutants listed below from points S1 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-1 ii) Lead and its compounds (as Pb) 5 mg l-1 iii) Cadmium and its compounds (as Cd) 0.25 mg l-1 iv) Mercury and its compounds (as Hg) 0.125 mg l-1 v) Arsenic and its compounds (as As) 2.5 mg l-1 vi) Zinc and its compounds (as Zn) 12.5mg l-1 vii) Total hydrocarbon oil 2mg l-1 <p>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 31/12/2009.</p> | 1/6/2009 |
| IC12 | <p>The Operator shall, within 12 months of start-up, carry out a full review of the Environmental Impact Assessment using actual emission data. The impact of the process on air, land, sewer and water shall be assessed and compared with background and benchmark levels. The report shall include the results of an assessment of whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution from the activities covered by this permit. A written report shall be submitted to the Agency for approval. The report shall also contain a time scale for the implementation of any individual measures identified to improve the performance of the installation, including emissions control performance, as appropriate following the review. The individual measures detailed in the report shall be implemented by the operator from the date of approval in writing by the Agency.</p> | 31/12/2009 |
| IC13 | <p>Based on the results of IC9, the Operator shall submit in writing to the Agency a Management Plan. This will ensure that the Authorised process meets the UK National Air Quality Strategy Objective and EC-Daughter Directive Standards from 2005 and by 2010 for Particulates (PM10) and from 2005 and by 2008 for Lead having taken account of general background concentration in the atmosphere and modelling proposed in IC9 above.</p> <p>The Management Plan shall define:</p> <ol style="list-style-type: none"> 1. The current environmental impact compared to the objectives and standards. 2. If relevant what firm plans are being developed and by when to ensure breaches of objectives do not occur. 3. What plans are in place to ensure the assessment is updated in light of new environmental data, models and other relevant matters and that the assessment is reviewed on an annual basis. | 1/7/2010 |

2. 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 description | reference | or Source | Sewer |
|----------------------------|--------------------------------|---|------------------------|
| S1 | (WD1 on drawing S4.4122-23(a)) | <i>Effluent treatment plant taking process waters from site process operations.</i> | <i>Welsh Water plc</i> |

3. 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 | <i>Flow m3 day⁻¹</i> | <i>150 Daily average</i> | <i>Continuous</i> | <i>To be agreed in writing with the Agency prior to commencement of measurement.</i> |
| S1 | <i>Biological Oxygen Demand mg litre⁻¹</i> | <i>10.0 Weekly average</i> | <i>Weekly</i> | <i>BS EN 1899-2 (BOD₅)</i> |
| S1 | <i>Suspended Solids mg litre⁻¹</i> | <i>400 Weekly average</i> | <i>Weekly composite made up of daily samples</i> | <i>SCA Blue Book 105 ISBN 011751957X</i> |
| S1 | <i>Hydrocarbon Oil mg litre⁻¹</i> | <i>No visible staining</i> | <i>Weekly composite made up of daily samples</i> | <i>-</i> |
| S1 | <i>pH max</i> | <i>11</i> | <i>Continuous</i> | <i>ISO 10523:1994 or BS 6068-2.50:1995</i> |
| S1 | <i>pH min</i> | <i>6</i> | <i>Continuous</i> | <i>ISO 10523:1994 or BS 6068-2.50:1995</i> |
| S1 | <i>Sulphate mg litre⁻¹</i> | <i>2000 Weekly average</i> | <i>Weekly composite made up of daily samples</i> | <i>SCA Blue Book 136 ISBN 0117522406</i> |
| S1 | <i>Antimony and its compounds (as Sb) mg litre⁻¹</i> | <i>2.5 Weekly average</i> | <i>Weekly composite made up of daily samples</i> | <i>BS ISO 17294-2:2003 or BS 6068-2.89:2003</i> |
| S1 | <i>Arsenic and its compounds (as As) mg litre⁻¹</i> | <i>2.5 Weekly average</i> | <i>Weekly composite made up of daily samples</i> | <i>BS ISO 17294-2:2003 or BS 6068-2.89:2003</i> |
| S1 | <i>Cadmium and its compounds (as Cd) mg litre⁻¹</i> | <i>0.25 Weekly average</i> | <i>Weekly composite made up of daily samples</i> | <i>BS ISO 17294-2:2003 or BS 6068-2.89:2003</i> |
| S1 | <i>Copper and its compounds (as Cu) mg litre⁻¹</i> | <i>12.5 Weekly average</i> | <i>Weekly composite made up of daily samples</i> | <i>BS ISO 17294-2:2003 or BS 6068-2.89:2003</i> |
| S1 | <i>Lead and its compounds (as Pb) mg litre⁻¹</i> | <i>5.0 Weekly average</i> | <i>Weekly composite made up of daily samples</i> | <i>BS ISO 17294-2:2003 or BS 6068-2.89:2003</i> |
| S1 | <i>Mercury and its compounds (as Hg) mg litre⁻¹</i> | <i>0.125 Weekly average</i> | <i>Weekly composite made up of daily samples</i> | <i>BS EN 13506:2002 or BS 6069-2.74:2002</i> |
| S1 | <i>Nickel and its compounds (as Ni) mg litre⁻¹</i> | <i>12.5 Weekly average</i> | <i>Weekly composite made up of daily samples</i> | <i>BS ISO 17294-2:2003 or BS 6068-2.89:2003</i> |
| S1 | <i>Zinc and its compounds (as Zn) mg litre⁻¹</i> | <i>12.5 Weekly average</i> | <i>Weekly composite made up of daily samples</i> | <i>BS ISO 17294-2:2003 or BS 6068-2.89:2003</i> |

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.

4. Schedule 2 shall be amended to;

Schedule 2 - Reporting of monitoring data

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 |

| | | | |
|---|-----------|------------------|---|
| <i>Flow m3 day⁻¹</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>Biological Oxygen Demand mg litre⁻¹</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>Suspended Solids mg litre⁻¹</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>Hydrocarbon Oil</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>pH max</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>pH min</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>Sulphate mg litre⁻¹</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>Antimony and its compounds (as Sb) mg litre⁻¹</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>Arsenic and its compounds (as As) mg litre⁻¹</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>Cadmium and its compounds (as Cd) mg litre⁻¹</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>Copper and its compounds (as Cu) mg litre⁻¹</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>Lead and its compounds (as Pb) mg litre⁻¹</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>Mercury and its compounds (as Hg) mg litre⁻¹</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>Nickel and its compounds (as Ni) mg litre⁻¹</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>Zinc and its compounds (as Zn) mg litre⁻¹</i> | <i>S1</i> | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>Water usage</i> | | <i>Annually</i> | <i>1st January 2006.</i> |
| <i>Energy Usage</i> | | <i>Annually</i> | <i>1st January 2006.</i> |
| <i>Waste disposal and/or Recovery</i> | | <i>Annually</i> | <i>1st January 2006.</i> |
| <i>Performance Indicators</i> | | <i>Annually</i> | <i>1st January 2006.</i> |
| <i>Quarterly Substance Report</i> | | <i>Quarterly</i> | <i>1st day of quarter in which operations commence</i> |
| <i>Results of compliance tests for the Rotary Furnace Slag against the UK Waste Acceptance Criteria for Hazardous Waste</i> | | <i>Quarterly</i> | <i>1st July 2008</i> |

Schedule 3 – conditions to be added

None

END OF VARIATION