

Variation notice with introductory note

Environmental Permitting (England & Wales) Regulations 2007

Pont-y-Felin Insulation

Knauf Insulation Ltd
Pont y Felin
Cwmbran
Torfaen
NP44 2YQ

Variation notice number
EPR/BR8212IK/V003

Permit number
EPR/BK8212IK

Pont - y - Felin Insulation

Permit number EPR/BR8212IK

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.

This variation is required to allow for the use of a new product binder. Knauf are replacing the existing phenol formaldehyde based binder with a new binder named "Ecosse™". The new binder is to be used on the main process line which produces glass fibre insulation. The new binder is designed to improve the environmental benefits of the product.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

Status Log of the permit		
Detail	Date	Response Date
Application BR8212	Received 16/07/02	
Additional Information received	Request dated 23/08/02	Response dated 20/09/02
Additional Information received	Request dated 08/10/02	Response dated 21/11/02
Additional Information received	Request dated 16/12/02	Response dated 09/04/03
Request by Agency to extend determination to 30 May 2003	Request dated 10/04/03	Response dated 14/04/03
Permit BR8212	Determined 30/05/03	
Application MP3038MP received	19/10/06	
Application MP3038MP	Duly made 19/10/06	
Additional Information received	Request dated 06/12/06	19/12/06
Additional Information received	Request dated 29/12/06	12/01/07
Additional Information received	Request dated 16/01/07	18/01/07
Variation notice MP3038MP issued	20/02/07	
Application EA/EPR/BR8212IK/V003 received	06/04/2009	
Application EA/EPR/BR8212IK/V003	Duly made 06/04/09	
Additional information received	Request dated 28/04/2009	
Variation issued V003	23/09/2009	

End of Introductory Note

Notice of variation

Environmental Permitting
(England and Wales) Regulations 2007

Permit number

EPR/BR8212IK

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.

Knauf Insulation Ltd ("the operator"),

whose registered office is

P. O. Box 10

St Helens

Merseyside

WA10 3NS

company registration number **1926842**

holds a permit to operate a regulated facility at

Pont-y-Felin Insulation

Pont-y-Felin

Cwmbran

Torfaen

NP44 2YQ

and that permit is varied to the extent set out in Schedules 1 to 3 of this notice.

The notice shall take effect from 23rd September 2009

Name	Date
A. W. Leakey 	23 rd September 2009

Authorised on behalf of the Environment Agency

Schedule 1 – conditions to be deleted

None.

Schedule 2 – conditions to be amended

The following conditions are amended as follows:

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1 table S1.2, unless otherwise agreed in writing by the Agency.

Table S1.2 Operating techniques

Description	Parts	Date Received
Application for permit BR8212	The response to sections 2.1, 2.2 and 2.3 of the application	16/07/02
1 st Schedule 4 Part 1 notice	The response to question 8.	20/09/02
2 nd Schedule 4 Part 1 notice	The response to questions 1,-4, 7, 8, 11, 13, 14, 17-20.	21/11/02
Application for variation MP3038MP	The response to sections 4.1.3, 4.1.4, 4.1.9 - 4.1.17	19/10/06
Application for variation EPR/BR8212IK/V003	The response to section 2.	06/04/09

- 3.6.1 The operator shall, unless otherwise agreed in writing by the Agency, undertake monitoring for the parameters, at the locations and at not less than the frequencies specified in the following tables in schedule 4 to this permit:

- (a) point source emissions specified in tables S4.1, S4.2 and S4.3;

Table S4.1 Point source emissions to air – emission limits and monitoring requirements

Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A0 [Point A0 on drawing no. H16015, revision D]	Particulate matter	White wool stack, post abatement.	35 mg/m ³	Extractive sample	6 monthly	BS EN 13284-1
A1 [Point A1 on drawing no. H16015, revision D]	Particulate matter	Release from furnace, post electrostatic precipitator	20 mg/m ³	Continuous	Daily average	BS EN 13284-1
A1 [Point A1 on drawing no. H16015, revision D]	Particulate matter	Release from furnace, post electrostatic precipitator	30 mg/m ³	Continuous	Half hour maximum	BS EN 13284-1
A1 [Point A1 on drawing no. H16015, revision D]	Particulate matter	Release from furnace, post electrostatic precipitator	30 mg/m ³	Extractive sample	6 monthly	BS EN 13284-1
A1 [Point A1 on drawing no. H16015, revision D]	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	Release from furnace, post electrostatic precipitator	300 mg/m ³	Daily average	Continuous & 6 monthly	ISO14792

A1 [Point A1 on drawing no. H16015, revision D]	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	Release from furnace, post electrostatic precipitator	450 mg/m ³	Half hour maximum	Continuous & 6 monthly	ISO14792
A1 [Point A1 on drawing no. H16015, revision D]	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	Release from furnace, post electrostatic precipitator	300 mg/m ³	Extractive sample	Continuous & 6 monthly	ISO14792
A1 [Point A1 on drawing no. H16015, revision D]	Carbon monoxide	Release from furnace, post electrostatic precipitator	200 mg/m ³	Extractive sample	6 monthly	US EPA 10/ ISO12039
A1 [Point A1 on drawing no. H16015, revision D]	Oxides of sulphur (as SO ₂)	Release from furnace, post electrostatic precipitator	100 mg/m ³	Extractive sample	6 monthly	BS EN14791
A1 [Point A1 on drawing no. H16015, revision D]	Gaseous fluorides (as HF)	Release from furnace, post electrostatic precipitator	5 mg/m ³	Extractive sample	6 monthly	US EPA26/26A
A1 [Point A1 on drawing no. H16015, revision D]	Gaseous Chlorides (as HCl)	Release from furnace, post electrostatic precipitator	20 mg/m ³	Extractive sample	6 monthly	BS EN1911
A2 [Point A2 on drawing no. H16015, revision D]	-	Release from bypass stack	-	-	-	-
A3 [Point A3 on drawing no. H16015, revision D]	Particulate matter	Release from forming & curing ovens and cooling zone	35 mg/m ³	Extractive sample	6 monthly	BS EN 13284-1
A3 [Point A3 on drawing no. H16015, revision D]	Phenol	Release from forming & curing ovens and cooling zone	10 mg/m ³	Extractive sample	6 monthly. Requirement to be reviewed following completion of IC11	BS EN 13649
A3 [Point A3 on drawing no. H16015, revision D]	Formaldehyde	Release from forming & curing ovens and cooling zone	5 mg/m ³	Extractive sample	6 monthly. Requirement to be reviewed following completion of IC11	US EPA 316
A3 [Point A3 on drawing no. H16015, revision D]	Ammonia	Release from forming & curing ovens and cooling zone	50 mg/m ³	Extractive sample	6 monthly	US EPA 26
A3 [Point A3 on drawing no. H16015, revision D]	Volatile organic compounds	Release from forming & curing ovens and cooling zone	35 mg/m ³	Extractive sample	6 monthly	BS EN 12619
A4 [Point A4 on drawing no. H16015, revision D]	Particulate matter	Release from batch plant	30 mg/m ³	Extractive sample	6 monthly	BS EN 13284-1

A5 [Point A5 on drawing no. H16015, revision D]	-	Wash water plant roof vent	-	-	-	-
A6 [Point A6 on drawing no. H16015, revision D]	-	Production hall roof vent	-	-	-	-
A7 [Point A7 on drawing no. H16015, revision D]	-	Fan house roof vent	-	-	-	-
A8 [Point A8 on drawing no. H16015, revision D]	-	Ammonia header tank vent	-	-	-	-
A9 [Point A9 on drawing no. H16015, revision D]	-	Binder tank vent	-	-	-	-
A10 [Point A10 on drawing no. H16015, revision D]	-	Boiler plant exhaust	-	-	-	-
A11 [Point A11 on drawing no. H16015, revision D]	-	LPG storage area	-	-	-	-
A12 [Point A12 on drawing no. H16015, revision D]	-	Gas metering area	-	-	-	-
A13 [Point A13 on drawing no. H16015, revision D]	-	Gas oil storage	-	-	-	-
A17 [Point A17 on drawing no. H16015, revision D]	-	Emergency generator	-	-	-	-
A18 [Point A18 on drawing no. H16015, revision D]	-	Furnace cooling water pump	-	-	-	-
A19 [Point A19 on drawing no. H16015, revision D]	-	Diesel compressor	-	-	-	-
A20 [Point A20 on drawing no. H16015, revision D]	-	Standby diesel pump (cullet cooling)	-	-	-	-
A21 [Point A21 on drawing no. H16015, revision D]	-	Binder plant vent	-	-	-	-
A22 [Point A22 on drawing no. H16015, revision D]	-	Vent from packaging area via bag filters	-	-	-	-

Schedule 3 – conditions to be added

The following conditions are added to the permit:

- 2.5.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Agency.

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC10	<p>The Operator shall undertake a review of the current practice of continually re-circulating the wash water and the impact of this on emissions to air and sewer. The assessment shall have regard to Sector Guidance EPR 3.03, most recent BREF document and include:</p> <ul style="list-style-type: none"> • The costs and benefits of using clean water versus re-use • The relative effectiveness of the wet scrubber using re-circulated water versus clean water, including effects on emissions to air • The frequency and quantity of discharge to effluent (S1) and clean water top-up • A schematic of the route taken by the wash water • Identification of alternative sources of water, including the re-use of cleaner waste water streams, roof water etc. • Options for water treatment of wash water, including the costs benefits <p>A report detailing the findings of the assessment together with timescales for any improvements shall be submitted to the Agency. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report. The individual measures detailed in the report shall be implemented by the operator from the date of approval by the Agency.</p>	01/07/2010
IC11	<p>The Operator shall carry out three rounds of monitoring for Phenol and Formaldehyde over a 6 month period at emission point A3 while the Ecosse binder is being used. Data from the six-monthly routine monitoring may also be used. A summary report shall be submitted to the Agency.</p> <p>Following the submission of the data, the requirement to monitor emissions of Phenol and Formaldehyde will be reviewed by the Agency. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report.</p>	01/07/2010 or following this date within 6 months of changing from PF binder to Ecosse.
IC12	<p>The Operator shall carry out an odour assessment in line with the Environment Agency guidance H4 to assess the impact of the Ecosse binder with respect to odour. The impact of the use of ammonium sulphate and any biocides used in the wash water should be included in the assessment.</p> <p>A report detailing the findings of the assessment together with timescales for any improvements shall be submitted to the Agency. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report. The individual measures detailed in the report shall be implemented by the operator from the date of approval by the Agency.</p>	01/04/2010
IC13	<p>The Operator shall assess the impact of the change of binder (Ecosse) and biocide on:</p> <ul style="list-style-type: none"> • the wet scrubber system • the impact on other parts of the process, for example plant corrosion <p>A report detailing the findings of the assessment together with timescales for any improvements shall be submitted to the Agency. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report. The individual measures detailed in the report shall be implemented by the operator from the date of approval by the Agency.</p>	01/07/2010