

Notice of variation with introductory note

Environmental Permitting (England & Wales) Regulations 2010

TRW Limited

TRW Automotive
New Road
New Inn
Pontypool
Torfaen
NP4 0TL

Variation application number
EPR/DP3430LX/V002

Permit number
EPR/DP3430LX

TRW Automotive

Permit number EPR/DP3430LX

Introductory note

This introductory note does not form a part of the notice

The following notice gives notice of the variation of an environmental permit.

This variation allows for the operation of a new zinc-nickel plating line with a total tank capacity of 168m³ and associated effluent treatment plant. These have been installed at the site in order to meet changing customer product requirements.

The new zinc-nickel plating process includes a 6m high (atop an 8m building) twin-stack air emission point. Although the extraction system is essentially one unit, the emission point is split into two stacks in order to achieve the required extraction rate for the plant by means of two drive fan motors. The main emissions will be hydrogen chloride (HCl) and hydrogen fluoride (HF). The new stack emission points are referenced A8/1 and A8/2.

The new Effluent Treatment Plant (ETP) serves the new zinc-nickel line and works in parallel to the existing ETP. The new ETP utilises the current emission point to foul sewer, referenced S1. This variation will result in an increase in zinc nickel in the waste water and also increase the quantity of waste water being released to sewer. Emission limits have been set in the permit which aligns with the limits granted by Welsh Water Dŵr Cymru (the sewer undertaker) in the site's effluent discharge consent, Reference 092.

The schedules specify the changes made to the original permit.

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

Status log of the permit		
Description	Date	Comments
Application DP3430LX	Received 15/02/2006	
Request for additional information	08/03/2006	
Additional information received	20/03/2006	Application Site Report and emergency spill procedures
Permit determined	31/07/2006	
Variation Application EPR/DP3430LX/V002	Duly made 30/07/2013	Application to add a zinc-nickel plating process and a new effluent treatment plant
Additional information received	25/10/2013	Updated point source emission point plan
Variation determined EPR/DP3430LX/V002	05/12/2013	Varied permit issued

End of introductory note

Notice of variation

Environmental Permitting (England and Wales) Regulations 2010

The Natural Resources Body for Wales ("Natural Resources Wales") in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2010 varies

Permit number
EPR/DP3430LX

issued to:
TRW Limited ("the operator")

whose registered office is:

Stratford Road
Solihull
West Midlands
B90 4AX

company registration number: **00872948**

to operate a regulated facility at:

TRW Automotive
New Road
New Inn
Pontypool
Torfaen
NP4 0TL

to the extent set out in the schedules.

The notice shall take effect from 05/12/2013.

Name

Date

	05/12/2013
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Eirian Macdonald
Authorised on behalf of Natural Resources Wales

Schedule 1 – conditions to be deleted

The following conditions are deleted as a result of the application made by the operator

Condition 2.2.8.1 is deleted

2.2.8 Equivalent Parameters or Technical Measures

- 2.2.8.1 The Operator shall comply with the requirements specified in Table 2.2.11, which supplement or replace emission limit values in accordance with Regulation 12(8) of the PPC Regulations.

Table 2.2.9 is deleted

Table 2.2.9 Equivalent parameters and technical measures

Parameter or measure	Requirement or description of measure, and frequency if relevant
Chromium treatment stage of ETP. Reduction of hexavalent chromium to trivalent chromium	pH is to be maintained between 2.0 – 2.5. The pH meter is to be connected to an alarm system, which alerts the Operator to any abnormal pH. A record to be kept of such events. This will cease in July 2007 or when the Operator phases out hexavalent chromium if at an earlier date.

Conditions 2.10.2 and 2.10.3 are deleted

- 2.10.2 The Operator shall carry out environmental or other specified substance monitoring to the frequencies and methods described in Table 2.10.1.
- 2.10.3 The Operator shall carry out monitoring of the process variables listed in Table 2.10.1 to the frequencies and methods described in that Table.

Table 2.10.1 is deleted

Table 2.10.1 : Other monitoring requirements

Emission point reference or source or description of point of measurement	Substance or parameter	Monitoring frequency	Monitoring method ^{Note 1}	Other specifications
S1	COD	Monthly	BS 6068-2.34:1988	
S1	Suspended solids	Monthly	BS 6068-2.54:1996	

Note 1: Or to an SCA Blue Book, EN, BS or ISO standard as approved by Natural Resources Wales.

Conditions 2.13.1 and 2.13.2 are deleted

2.13 Transfer to effluent treatment plant

- 2.13.1 No transfers to effluent treatment plant are controlled under this part of this Permit.
- 2.13.2 No condition applies.

Schedule 2 – conditions to be amended

The following conditions are amended as a result of the application made by the operator

Table 1.1.1 is amended to

Table 1.1.1		
Activity listed in Schedule 1 of the EPR Regulations / Associated Activity	Description of specified activity	Limits of specified activity
Section 2.3 Part A(1)(a)	Surface treating metals using an electrolytic or chemical process where the aggregated volume of the treatment vats is more than 30m ³ .	Receipt of raw materials to despatch of finished product.
	Zinc plating and anodising with a capacity of 82m ³	
	Zinc-nickel plating with a capacity of 168m ³	
	Aggregated volume of treatment tanks is 250m ³	
Section 5.4 Part A(1)(a)(ii)	Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment.	Receipt of effluent from surface treatment processes to joint point of discharge to sewerage undertaker's sewer.
	Effluent treatment plant servicing the zinc plating line.	
	Effluent treatment plant servicing the zinc-nickel plating process line.	
Directly associated activities		

Table 1.4.1 is amended to

Table 1.4.1: Improvement programme		
Reference	Requirement	Date
IC1	The Operator shall undertake ambient monitoring of hydrogen fluoride (HF) from around the acid pickle tank - tank No 5 in the acid zinc process line, the results of which shall be submitted to the Agency.	Complete

Reference	Requirement	Date
IC 2	The Operator shall undertake an assessment and establish an inspection and maintenance programme for all the surfacing and containment measures on site. The assessment will take into account the requirements of section 2.2.5 of the Agency Guidance Note IPPC S2.07, June 2004. A written report summarising the findings shall be submitted to the Agency which contains a timescale for implementation of any improvements identified. The report shall be approved by the Agency.	Complete
IC 3	The Operator shall undertake an assessment of subsurface structures and their potential to cause fugitive emissions to surface water and ground water. The assessment will take into account the requirements of section 2.2.5 of the Agency Guidance Note IPPC S2.07, June 2004. A written report summarising the findings shall be submitted to the Agency which contains a timescale for implementation of any improvements identified. The report shall be approved by the Agency .	Complete
IC 4	The Operator shall review the emission of zinc released to S1 to reduce levels to benchmarks noted in Section 3.2.2 of the Agency Guidance Note IPPC S2.07, June 2004. The Operator shall submit a report to the Agency in writing for approval detailing a timetable for any improvements identified.	Complete
IC 5	The Operator shall provide a report detailing the proposals to the Agency for the substitution of chromium VI for a less hazardous alternative as detailed in the Agency Guidance Note IPPC S2.07, June 2004. A timetable for the implementation of the substitution identified in the report shall be agreed with the Agency in writing	Complete
IC 6	The Operator shall undertake an assessment of the energy management improvement measures on site. The assessment will take into account the requirements of section 2.7.2 of the Agency Sector Guidance Note IPPC S2.07, June 2004. A written report summarising the findings shall be submitted to the Agency. A timescale for implementation of any improvements shall be approved by the Agency.	Complete
IC 7	The Operator shall carry out a water efficiency audit of the installation. The audit shall have regard to the Agency Guidance Note IPPC S2.07 June 2004, Section 2.1.8. A report shall be submitted for approval by the Agency with timescales for the implementation of any improvements identified.	Complete
IC 8	The Operator shall undertake a feasibility study to investigate reuse of water from the installation effluent treatment plant. A summary of the report shall be submitted to the Agency including any identified improvements. The improvements shall be implemented by the Operator from the date of approval by the Agency in writing.	Complete
IC 9	The Operator shall assess the free board depth on all process tanks in regard to the Agency Guidance Note IPPC S2.07 June 2004, Section 2.2.4. A report shall be submitted for approval by the Agency with timescales for the implementation of any improvements identified.	Complete
IC10	The Operator shall carry out emissions monitoring for hydrogen chloride and hydrogen fluoride (as F) at air emission points A8/1 and A8/2 when the plant is in full production to measure the emissions to air from the zinc-nickel plating process. Based on the results of the monitoring the Operator shall assess the need for, and develop an on-going monitoring program for the zinc-nickel plating process as necessary. The Operator shall provide a report to Natural Resources Wales with proposals for a monitoring program or provide full justification as to why a monitoring program may not be necessary.	30/06/2014

Table 2.1.1 is amended to

Table 2.1.1: Operating techniques		
Description	Parts	Date Received
Application	The response to questions 2.1, 2.1.9, 2.1.13, 2.2.1.2, 2.2.2.1 and 2.2.3.6 given in the application	15/02/2006
Further information requested	Emergency Spill Procedures	20/03/2006
Variation application EPR/DP3430LX/V002	Variation application BAT assessment documents "Zinc-Nickel Plant Details 1" and "Zinc-Nickel Effluent Plant Details 1"	30/07/2013

Table 2.2.1 is amended to

Table 2.2.1 : Emission points to air		
Emission point reference or description	Source	Location of emission point
A1	Zinc acid plating tank - lip extraction 8A	Labelled as A1 on amended Factory Roof Emission Points Plan in Schedule 4
A2	Zinc acid plating tank - lip extraction 8B	Labelled as A2 on amended Factory Roof Emission Points Plan in Schedule 4
A3	Zinc plating tank 8A	Labelled as A3 on amended Factory Roof Emission Points Plan in Schedule 4
A4	Zinc plating tank 8B	Labelled as A4 on amended Factory Roof Emission Points Plan in Schedule 4
A5	Zinc acid plating tank 8C	Labelled as A5 on amended Factory Roof Emission Points Plan in Schedule 4
A6	Zinc acid plating tank 8D	Labelled as A6 on amended Factory Roof Emission Points Plan in Schedule 4
A7	Anodise – sulphuric acid tank	Labelled as A7 on amended Factory Roof Emission Points Plan in Schedule 4
A8/1 and A8/2	Zinc-nickel plating tanks - lip extraction from the zinc-nickel plating process	Labelled as A8/1 and A8/2 on amended Factory Roof Emission Points Plan in Schedule 4

Table 2.2.8 is amended to

Table 2.2.8 : Emission limits and monitoring frequency to sewer				
Emission point reference	Substance	Limit (including Reference Period)	Monitoring frequency	Monitoring method ^[1]
S1 – V Notch	Zinc	5.0mg/l	Monthly	BS ISO 17294-2:2003 BS 6068-2.89:2003
S1 – V Notch	Nickel	2.0mg/l	Monthly	BS ISO 17294-2:2003 BS 6068-2.89:2003
S1 – V Notch	Chromium	4.0mg/l	Monthly	BS ISO 17294-2:2003 BS 6068-2.89:2003
S1 – V Notch	Copper	2.0mg/l	Monthly	BS ISO 17294-2:2003 BS 6068-2.89:2003
S1 – V Notch	pH	Min. 6, Max. 11	Monthly	BS 6068-2.50:1995, ISO 10523:1984

^[1] or to an SCA Blue Book, EN, BS or ISO standard as approved by Natural Resources Wales.

Table S2 is amended to

Table S2: Reporting of monitoring data			
Parameter	Emission point	Reporting period	Period begins
Zinc, mg/l	S1	6 monthly	01/07/2006
Nickel, mg/l	S1	6 monthly	01/07/2006
Chromium, mg/l	S1	6 monthly	01/07/2006
Copper, mg/l	S1	6 monthly	01/07/2006
pH	S1	6 monthly	01/07/2006
Water usage	NA	Every 12 months	01/07/2006
Energy usage	NA	Every 12 months	01/07/2006
Waste disposal and/or recovery	NA	Every 12 months	01/07/2006

Table S3 is amended to

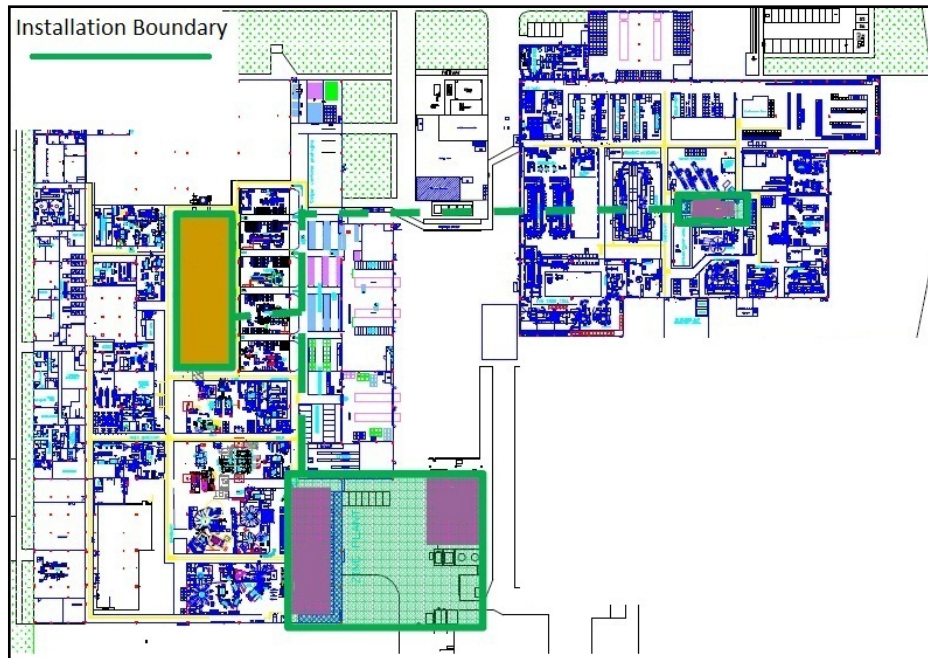
Table S3: Reporting Forms		
Media / parameter	Form Number	Date of Form
Sewer	S1	05/12/2013
Energy	E1	05/12/2013
Waste Return	R1	05/12/2013
Water usage	WU1	05/12/2013

Schedule 3 – conditions to be added

None

Schedule 4 – amended plans

Amended Installation boundary plan attached



*Green dashed lines link the permitted areas. The lines represent overhead pipe work which is covered by the conditions of the permit.

Amended factory roof emission point plan attached

