

Notice of variation with introductory note

Environmental Permitting (England & Wales) Regulations 2016

Convatec Limited

**Convatec Rhymney Gelling Fibre
Plant
Heads of the Valley Industrial Estate
Rhymney
Tredegar
NP22 5RL**

Variation number

EPR/NP3433BC/V005

Permit number

EPR/NP3433BC

Convatec Rhymney Gelling Fibre Plant

Permit number EPR/NP3433BC

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 updates permit EPR/NP3433BC relating to the Hydrocel Plant located within Unit 1 of Convatec Limited's site in Rhymney. The variation updates the permit to replace the current bioscrubber on site with a Regenerative Thermal Oxidiser (RTO), and to increase the permit boundary to accommodate this new abatement equipment. Although the production capacity will be doubled, this is already permitted within the existing permit.

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 for permit NP3433BC received	06/10/2004	
Additional information received	26/01/2005	
Application determined, permit NP3433BC granted	24/03/2005	
Variation application PP3433LP (NP3433BC/V002) received	07/09/2005	
Application PP3433LP (NP3433BC/V002) determined, variation notice issued	01/12/2005	
Variation application EPR/NP3433BC/V003 received	24/06/2008	
Application EPR/NP3433BC/V003 determined, variation notice issued	04/03/2009	
Variation application EPR/NP3433BC/V004 received	01/03/2012	Variation application to add a new boiler
Application EPR/NP3433BC/V004 determined, variation notice issued	30/03/2012	
Variation application EPR/NP3433BC/V005 received	Duly made 16/03/2018	Variation application to replace bioscrubber with RTO
Request for further information (Schedule 5) issued	15/05/2018	Request for site plan and for information on noise and odour
Additional information received	31/05/2018	Statutory deadline extended by 16 days
Request for extension to determination deadline by NRW	20/06/2018	
Request to extend determination deadline approved by operator	29/06/2018	Deadline extended by 18 days
Application EPR/NP3433BC/V005 determined, variation notice issued	17/07/2018	

Other Part A installation permits relating to this installation

Operator	Permit number	Date of issue
Convatec Limited	TP3535LH	17/11/2006

End of introductory note

Notice of variation

Environmental Permitting (England and Wales) Regulations 2016

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 2016 varies

Permit number
EPR/NP3433BC

issued to:
Convatec Limited (“the operator”)

whose registered office is

**Gdc First Avenue
Deeside Industrial Park
Deeside
Flintshire
CH5 2NU**

company registration number **01309639**

to operate a regulated facility at

**Convatec Rhymney Gelling Fibre Plant
Heads of the Valley Industrial Estate
Rhymney
Tredegar
NP22 5RL**

to the extent set out in the schedules.

The notice shall take effect from 17th July 2018.

Signed

Date

Holly Noble	17th July 2018
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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:

2.2.7.2 No emission from the Permitted installation shall be made to land.

Schedule 2 – conditions to be amended

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

Table 1.1.1

Activity listed in Schedule 1 of the EPR Regulations/Associated Activity	Description of specified activity	Limits of specified activity
Section 4.5 A(1)(a) – Producing pharmaceutical products	Manufacture of gelling fibres	Receipt of raw materials to despatch of finished product.
Section 7 Part B – SED Activities. Manufacturing of pharmaceutical products.	Manufacture of pharmaceutical products	Receipt of raw materials to despatch of finished product.
Directly Associated Activity	Storage and disposal of waste	From generation of waste to dispatch off site.
Directly Associated Activity	Control and abatement systems for emissions to air	Treatment of waste gases via a regenerative thermal oxidiser (RTO).

Table 1.4.1: Improvement programme

Reference	Requirement	Date
IP1	The Operator shall establish a mass balance calculation to determine the total VOC emission from the Installation, as a percentage of the total solvent input, and submit a copy to the Agency for approval.	Complete
IP2	The Operator shall provide a summary report, detailing plant commissioning operational performance. Details to be agreed in writing with the Agency.	Complete
IP3	The Operator shall implement a formal procedure for the inspection and subsequent maintenance of tanks, impervious surfaces, containment kerbs and underground sumps with the purpose of preventing fugitive releases to ground. A copy of the procedure shall be submitted to the Agency.	Complete
IP4	The Operator shall implement a system to enable specific energy consumption monitoring of the installation.	Complete
IP5	The Operator shall undertake an assessment of the impact of noise arising from the Installation on the amenity of the locality. This assessment shall be undertaken to a specification agreed with the Environment Agency. A report shall be sent to the Agency detailing proposals for the implementation of any further improvement options representing BAT.	Complete
IP6	The Operator shall establish a Site Closure Plan having regard for the Agency Sector Guidance Note IPPC S4.02 and submit a copy to the Agency for approval.	Complete
IP7	The Operator shall obtain ISO 14001 certification for the installation as detailed in the application.	Complete
IP8	The Operator shall review the provision of MCERTS accreditation for the monitoring equipment, personnel and organisations employed for the emissions monitoring programme in condition 2.10.1 and propose a timetable for achieving this standard for any elements which are not MCERTS certified.	Complete
IP9	The Operator shall conduct an assessment of all monitoring methods and procedures, both in-house and those employed by external contractors, for conformance with appropriate monitoring Standards such as CEN, BSI, ISO, etc., having regard for the Agency's Sector Guidance IPPC S4.02 and Monitoring Guidance M2 and the Sampling and Analysis Standards presented. A report on the findings and proposed actions will be submitted to the Agency.	Complete
IP10	The Operator shall use measured VOC emission data to review the environmental impact of the installation using the Environment Agency's H1 assessment tool, or other agreed system.	Complete
IP11	The Operator shall monitor releases to A2. This monitoring shall be agreed with the Agency prior to work commencing. A report shall be submitted to the Agency and agreed in writing and shall include monitoring results, a H1 assessment, further modelling if required, measures if required to minimise releases and a plan giving timescales for implementation of these.	Complete

Table 1.4.1: Improvement programme

Reference	Requirement	Date
IP12	<p>Following successful commissioning and establishment of routine steady operation of the RTO, the Operator shall undertake noise monitoring at the nearest local receptors. This shall include:</p> <ul style="list-style-type: none"> - A full noise monitoring survey and assessment meeting the BS4142:2014 standard - 1/3rd octave and narrow band (FFT) measurements to identify any tonal elements or low frequency noise - Reference to the World Health Organisation guidelines for community noise <p>Upon completion of the work, a written report shall be submitted to Natural Resources Wales. If rating levels likely to cause adverse impact at sensitive receptors are detected, the report shall include an assessment of the most suitable abatement techniques, an estimate of the cost and a proposed timetable for their installation.</p>	Within 6 months of the completion of commissioning of the RTO
IP13	Emissions from the new RTO shall be monitored and reported on a quarterly basis rather than on an annual basis for the 1 st year of monitoring.	

Table 2.2.1: Emission points to air

Emission point ref. or description	Source	Location of emission point
A1	Bioscrubber stack	Point A1 on site layout plan (Schedule 4)
A1A	RTO stack	Point A1A on site layout plan (Schedule 4)
A2	Reactor room extract	Point A2 on site layout plan (Schedule 4)
A3	Dust extraction	Point A3 on site layout plan (Schedule 4)
A4	Steam boiler	Point A4 on site layout plan (Schedule 4)
A5	Medicel room extract EP34	Point A5 on site layout plan (Schedule 4)
A6	Medicel LEV extract EP35	Point A6 on site layout plan (Schedule 4)
A7	Silver hydrocel room extract EP36	Point A7 on site layout plan (Schedule 4)
A8	Silver hydrocel LEV extract EP37	Point A8 on site layout plan (Schedule 4)
A9	Hydrocel room extract EP38	Point A9 on site layout plan (Schedule 4)
A10	Hydrocel LEV extract EP39	Point A10 on site layout plan (Schedule 4)
A11	Fallow suite room extract EPFS1	Point A11 on site layout plan (Schedule 4)
A12	Fallow suite LEV extract EPFS2	Point A12 on site layout plan (Schedule 4)
A13	Gas fired boiler	Point A13 on site layout plan (Schedule 4)

Table 2.2.2: Emission limits to air and monitoring

Emission point ref. or description	Parameter	Limit (including Reference Period) ¹	Monitoring frequency	Monitoring method ²
A1	VOC (as Carbon)	No limit ³	Continuous and annual extractive	BS EN 12619
A1A	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	50 mg/m ³	Annual	BS EN 14792
	Carbon Monoxide	100 mg/m ³	Annual	BS EN 15058
	VOC (as Carbon)	20 mg/m ³	Annual	BS EN 12619
A3	Dust	No visible release	N/A	N/A

Note 1: See section 6.1.3 for reference conditions

Note 2: Or as agreed in writing with Natural Resources Wales

Note 3: Limit to be reviewed twelve months after commencement of operations

2.2.2 Emissions to water or land

- 2.2.2.1 This Part 2.2.2 of this Permit shall not apply to releases of odour, noise or vibration or to releases to groundwater
- 2.2.2.2 Conditions 2.2.2.3 – 2.2.2.6 shall not apply to emissions to sewer
- 2.2.2.3 There shall be no point source emissions to water or land except from the sources and emission points listed in table 2.2.3. The limits given in table 2.2.3 shall not be exceeded.
- 2.2.2.4 No condition applies
- 2.2.2.5 No condition applies
- 2.2.2.6 No condition applies

Table S2: Reporting of monitoring data

Parameter	Emission point	Reporting period	Period begins
VOC mg/m ³ (continuous)	A1	Every 3 months	1 st April 2005
VOC mg/m ³ (extractive)	A1, A1A	Annually	1 st April 2005
VOC % of total input	All emissions	Every 3 months	1 st April 2005
Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	A1A	Annually	17 th July 2018
Carbon Monoxide	A1A	Annually	17 th July 2018
Chemical oxygen demand mg/l	S1	Every 3 months	1 st April 2005
Suspended solids mg/l	S1	Every 3 months	1 st April 2005
pH	S1	Every 3 months	1 st April 2005
Water usage	N/A	Every 12 months	1 st April 2005
Energy usage	N/A	Every 12 months	1 st April 2005
Waste disposal and/or recovery	N/A	Every 12 months	1 st April 2005

Schedule 3 – conditions to be added

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

Table 2.2.3: Point source emissions to water (other than sewer) and land

Emission point ref. or description	Parameter	Limit (including Reference Period)	Monitoring frequency	Monitoring method
W1	N/A	N/A	N/A	N/A

Schedule 4 – amended plan

Amended plan attached:

