

EAST.



**ENVIRONMENT  
AGENCY**

## Variation Notice with introductory note

Pollution Prevention and Control Regulations 2000

---

**Great Lakes Manufacturing  
(UK) Ltd  
Tenax Road  
Trafford Park  
Manchester  
M17 1WT**

Variation Notice number  
BX7096

Permit number  
BM0273

## 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 to produce organic chemicals.

This variation is to include the production of organic esters produced by the reaction of tetrabromophthalic anhydride and various high boiling point alcohols.

The esters have specialist use as fire retardants.

The production is to be carried out in existing, but currently redundant, plant and equipment, which is already within the boundary of the installation. This plant and equipment was previously used for other ester products.

<b>Other PPC Permits relating to this Installation</b>		
<b>Permit holder</b>	<b>Permit Number</b>	<b>Date of Issue</b>
Exel Europe Ltd	BU5828	22/10/03
Dalkia Utilities Services Ltd	BU5836	22/10/03

<b>Superseded Licenses/Consents/Authorisations relating to this Installation</b>		
<b>Holder</b>	<b>Reference Number</b>	<b>Date of Issue</b>
There are no permits superseded by this variation.		

## 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 BM0273	Received 21/03/03	
Request to extend determination	Request dated 24/07/03	Request accepted 31/07/03
Response to request for information	Request dated 29/07/03	Response dated 22/08/03
Permit BM0273	Determined 22/10/03	
Application BX7096 for variation	Duly made 02/04/04	
Variation BX7096	Determined 01/06/04	

*End of introductory Note*



## Variation Notice

Permit number (The Permit)  
**BM0273**

Variation Notice number  
**BX7096**

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 22 October 2003 and held by you.

Great Lakes Manufacturing (UK) Ltd ("the Operator"),

whose Registered Office (or Principal Office) is

Tenax Road  
Trafford Park  
Manchester M17 1WT

**Company registration number 2624692**

which relates to the operation of part of an Installation at

**Great Lakes Trafford Park  
Tenax Road, Manchester  
M17 1WT**

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

This Notice shall take effect from 1 June 2004

Signed

A rectangular box containing a handwritten signature in cursive script that reads "K. W. Murray".

**Dr. K. W. Murray**

**Authorised to sign on behalf of the Environment Agency**

Date

A rectangular box containing the handwritten date "28/5/04".

## **SCHEDULE 1 - CONDITIONS TO BE DELETED**

1. None

## SCHEDULE 2 - CONDITIONS TO BE AMENDED

2. Table 1.1.1 is amended to:-

**Table 1.1.1**

Activity listed in Schedule 1 of the PPC Regulations / Associated Activity	Description of specified activity	Limits of specified activity
Section 4.1 A (1) (a) (ii) – Producing organic chemicals containing oxygen.	Manufacture of water additive products	From receipt of raw materials to despatch of finished goods, excludes operation of warehouse and boiler plant.
Section 4.1 A (1) (a) (ii) – Producing organic chemicals containing oxygen.	Manufacture of fire retardant esters.	From receipt of raw materials to despatch of finished goods, excludes operation of warehouse and boiler plant.
Section 4.1 A (1) (a) (v) – Producing organic chemicals containing phosphorous	Manufacture of aryl phosphates.	From receipt of raw materials to despatch of finished goods, excludes operation of warehouse and boiler plant.
Operation of Pilot Plant (associated activity)	Research and Development on the manufacture of water additive products and aryl phosphates	Excludes chemicals not otherwise manufactured at Trafford Park
Effluent Pre-treatment (associated activity)	Flow and pH balancing	Up to discharge to public sewer system.

3. Table 2.1.1 is amended to:-

**Table 2.1.1: Operating techniques**

Description	Parts	Date Received
Application	The response to questions B2.2 and B2.3 given in sections 4 & 5 of the application on pages 59 to 120 and in appendices L1 and L2.	21 <sup>st</sup> March 03
Letter from Applicant dated 18 <sup>th</sup> June 2003	Redesignation of tank T164 from the purpose stated in application.	
Response dated 22 <sup>nd</sup> Aug 2003 to Schedule 4 Notice	Response to question 2.	27 <sup>th</sup> August 03
Application for variation	Sections 4 & 5 of the application for variation on pages 7 to 17 (inclusive)	Duly made 2 <sup>nd</sup> April 2004

4. Condition 2.4.1.1 is amended to:-

Maintain the raw materials table or description submitted in response to section 2.4 of the Application for a permit and in Tables 8.1 and 8.2 of the application for a variation dated 02/04/04. The tables and descriptions should be considered on a periodic basis whether there are suitable alternative materials to reduce environmental impact;

### SCHEDULE 3 - CONDITIONS TO BE ADDED

5. The following improvement conditions shall be added to Table 1.4.1

11	<p>The operator shall provide a report of monitoring of the release of 2-ethylhexanol from the following points:-</p> <p>Point 40 (VO157) Point 42 (VO160) Point 45 (VO265)</p> <p>Each point shall be monitored to method BS EN 13649 / (OSHA 32 or NIOSH 2546) on at least 3 separate occasions when operating conditions are stable and when 2-ethylhexanol is likely to be present.</p> <p>The effect of that release on the environment shall be re-assessed for any release point where the average release is more than 2 times the calculated release given in the application for variation dated 2 April 2004.</p>	31 May 2005
12	<p>Provide a summary on the optimisation of process operations. The report should have particular regard to raw material usage, energy efficiency and waste minimisation.</p>	31 Dec. 2005
13	<p>Provide a summary report of an investigation into reducing the amount of brominated species in the waste disposed by incineration.</p>	31 Dec. 2005