

Variation notice with introductory note

Environmental Permitting (England & Wales) Regulations 2010

West Bromwich Chemical Works

Robinson Brothers Limited
Phoenix Street
West Bromwich
West Midlands
B70 0AH

Variation notice number
EA/EPR/BS4316IV/V010

Permit number
BS4316IV

West Bromwich Chemical Works

Permit number EPR/BS4316IV

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 2010 S.I.2010 No. 675 (the Regulations), gives notice of the variation of an environmental permit to operate a regulated facility.

This variation removes the requirement to monitor for organic sulphides and mercaptans on the exhaust of the chemical scrubber (monitoring point G01).

Schedule 1 of this notice lists any deleted conditions, Schedule 2 lists any amended conditions, Schedule 3 lists any conditions that have been added and Schedule 4 shows any changes to the plan.

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 BS4316	Received 02/09/03	Duly made following further submission on 10/09/04
Response to request for information (letter)	Request dated 08/04/04	Responses dated 04/05/04 and 06/07/04
Response to request for information (schedule 4 notice)	Request dated 18/05/04	Responses dated 15/06/04 and 06/07/04 and 29/07/04 and 04/08/04
Response to request for information (letter)	Request dated 06/07/04	Response dated 20/07/04
Request to extend determination period to 30/04/04	Request dated 05/12/03	Request accepted 12/12/03
Request to extend determination period to 31/08/04	Request dated 14/05/04	Request accepted 24/05/04
Request to extend determination period to 14/09/04	Request dated 31/08/04	Request accepted 31/08/04
Addendum to Application	Dated 02/09/04	Received 03/09/04
Permit determined	08/09/04	
Variation SP3234SK	01/03/05	Revision of completion date for an improvement condition and new improvement condition requiring the operator to consider improvements to gas odorant transfer couplings.
Application for WID variation GP3832SM	Received 01/04/05	
Schedule 4 Notice issued requiring addition information	Sent 07/06/05	
Response to schedule 4 Notice	Received 14/07/05	
Request for extension to 30/11/05	Sent 02/08/05	
Agreement to extension	Received 04/08/05	
Variation GP3832SM	Determined 22/12/05	
Consolidating Variation FP3232LK	Determined 25/08/06	
Application for Variation NP3936ME to burn waste in boiler	Received 21/12/06	
Further Information received	Received 23/02/07	Dated 22/02/07
Further Information received	Received 09/03/07	Dated 22/02/07

Variation NP3936ME	Determined 31/03/07	
Application for Variation GP3734UK to add emission points	Received 03/05/07	
Additional Information received	Received 31/07/07, 13/08/07	
Variation GP3734UK	Determined 31/08/07	
Application for Variation WP3238XB to alter monitoring	Received 04/02/08	
Further Information	Received 11/04/08	
Variation WP3238XB	Determined	
Application for Variation MP3136GV to add EWC code	Received 17/02/09	
Variation MP3136GV	Determined 20/02/09	
Application for Administrative Variation EA/EPR/BS4316IV/V008	Received 22/06/09	
Variation EA/EPRBS4316IV/V008	Issued 16/07/09	Consolidated Permit
Application for Variation EA/EPR/BS4316IV/V009	Received 15/10/09	
Variation EA/EPR/BS4316IV/V009	Issued 18/02/10	
Application for Variation EA/EPR/BS4316IV/V010	Received 22/04/10	
Variation EA/EPR/BS4316IV/V010	Issued 18/10/10	

End of Introductory Note

Notice of variation

**Environmental Permitting
(England and Wales) Regulations 2010**

Permit number

EPR/BS4316IV

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.

Robinson Brothers Limited ("the operator"),

whose registered office is

**Phoenix Street
West Bromwich
West Midlands
B70 0AH**

company registration number **00201053**

holds a permit to operate a regulated facility at

West Bromwich Chemical Works

**Phoenix Street
West Bromwich
West Midlands
B70 0AH**

and that permit is varied to the extent set out in Schedules 1 to 4 of this notice.

The notice shall take effect from 25 October 2010.

Name	Date
A. J. Nixon	25 October 2010

Authorised on behalf of the Environment Agency

Schedule 1 – conditions to be deleted

None

Schedule 2 – conditions to be amended

1. Table 2.1.1 to be amended as detailed in bold.

Table 2.1.1: Operating techniques		
Description	Parts	Date Received
Application	The response to questions 2.1 and 2.2 given in sections 2.1 and 2.2 of the application. The Multi Product Protocol (MPP) contained in Appendix 1	10/09/03
Additional Information	All	04/05/04
Additional Information	Sections 1 to 5 (sections 2, 3 and 5 refer to the Multi Product Protocol)	18/06/04
Additional Information	Sections 6 to 10	08/07/04
Additional Information	Sections A to E	28/07/04
Additional Information	All	03/09/04
Application for Variation GP3832SM	The response and additional information in response to questions 2.1 and 2.2 and appendix 1 of the Application	01/04/05
Application for Variation NP3936ME	Sections C2.1 and C2.2	21/12/06
Additional information	All	23/02/07
Application for Variation GP3734UK	Sections C1, C2, C3, C4, C5 and C6 and the updated plan of NP4,	03/05/07
Additional Information	All	31/07/07
Additional Information	All	13/08/07
Application for Variation WP3238XB	Section C	04/02/08
Additional Information	All	11/04/08
Additional Information	Emission point plan	24/04/08
Application for Variation MP3136GV	Section C	16/02/09
Application for Variation RP3532KB	Document reference RC/RBL/04.	15/10/09
Application for Variation EPR/BS4316IV/V010	Section C	22/04/10

2. Table 2.2.2 to be amended as follows, such that the requirement to monitor for organic sulphides and mercaptans from emission point G01, has now been removed.

Table 2.2.2 : Emission limits to air and monitoring. Emissions NOT regulated under Waste Incineration Directive

Emission point reference	Parameter	Monitoring frequency	Limit (including Reference Period)	Monitoring method Note 8
A1(a)	Total dust	continuous	10 mg/m ³ daily average. Note 7	BS EN 13284-2
A1(a)	Total dust	continuous	30 mg/m ³ ½ hour average. Note 7	BS EN 13284-2
A1(a)	Total Organic Carbon (as C)	continuous	10 mg/m ³ daily average. Note 7	BS EN 12619
A1(a)	Total Organic Carbon (as C)	continuous	20 mg/m ³ , ½ hour average Note 7	BS EN 12619
A1(a)	Hydrogen Chloride	continuous	10 mg/m ³ daily average. Note 7	MCERTS certified instruments
A1(a)	Hydrogen Chloride	continuous	60 mg/m ³ , ½ hourly average. Note 7	MCERTS certified instruments
A1(a)	Sulphur dioxide	continuous	50 mg/m ³ daily average. Note 7	ISO 6069-4.4
A1(a)	Sulphur dioxide	continuous	200 mg/m ³ , ½ hourly average. Note 7	ISO 6069-4.4
A1(a)	Oxides of nitrogen, expressed as NO ₂	continuous	400 mg/m ³ daily average. Note 7	ISO 10849
A1(a)	Oxides of nitrogen, expressed as NO ₂	continuous	500 mg/m ³ ½ hourly average. note 7	ISO 10849
A1(a)	Carbon monoxide	continuous	50 mg/m ³ daily average. Note 7	ISO 12039
A1(a)	Carbon monoxide	continuous	100 mg/m ³ , ½ hourly average. Note 7	ISO 12039
A1(a)	Carbon disulphide	6 monthly	2 mg/m ³	BS EN 13649
A1(a)	Hydrogen sulphide	6 monthly	5 mg/m ³	US EPA Method 11
A1(a),	Organic sulphides and mercaptans (as methyl mercaptan)	6 monthly	2 mg/m ³	Note 1
NP2V1, NP2V2, NP5V10, NP7V5, NP8V8, NP8V9	Amines as Dimethylamine	Annually, Note 4	10 mg/m ³	Sampling based on BS EN 13649. Analysis using principles of NIOSH methods 2002 and 2010
NP2V1, NP2V2, NP5V10, NP7V5, NP8V8, NP8V9	carbon disulphide	Annually, Note 4	5 mg/m ³	BS EN 13649

Table 2.2.2 continued: Emission limits to air and monitoring. Emissions <u>NOT</u> regulated under Waste Incineration Directive				
NP2V1, NP2V2, NP5V10, NP7V5, NP8V8, NP8V9	Ammonia	Annually, Note 4	10 mg/m ³	US EPA method 26
NP2V1, NP2V2, NP5V10, NP7V5, NP8V8, NP8V9	Hydrogen Chloride	Annually, Note 4	10 mg/m ³	BS EN 1911 :1998
RA6V19, RA6V20, RA6V28	Carbon disulphide	Quarterly, Note 4	4.5 kg per batch	BS EN 13649
RA6V19, RA6V20, RA6V28	Amines as Dimethylamine	Quarterly, Note 4	0.2 kg/hr	Sampling based on BS EN 13649. Analysis using principles of NIOSH methods 2002 and 2010
RRPV12 Note 2	Amines as Dimethyl amine	Quarterly Note 5	10 mg/m ³	Sampling based on BS EN 13649. Analysis using principles of NIOSH methods 2002 and 2010
RRPV12, Note 2	Ammonia	Quarterly Note 5	10 mg/m ³	US EPA method 26
RRPV12, Note 2	Carbon Disulphide	Quarterly Note 5	5 mg/m ³	BS EN 13649
RRPV12, Note 2	Fluorine	Quarterly Note 5	5 mg/m ³	BS ISO 15713
RRPV12, Note 2	Chlorine	Quarterly Note 5	10 mg/m ³	BS ISO 15713
RRPV12, Note 2	Bromine	Quarterly Note 5	10 mg/m ³	BS ISO 15713
RRPV12, Note 2	Hydrogen Fluoride	Quarterly Note 5	5 mg/m ³	Note 1
RRPV12, Note 2	Hydrogen Chloride	Quarterly Note 5	10 mg/m ³	BS EN 1911 :1998
RRPV12, Note 2	Hydrogen Bromide	Quarterly Note 5	5 mg/m ³	Note 1
RRPV12, Note 2	Hydrogen Cyanide	Quarterly Note 5	2 mg/m ³	Note 1
RRPV12, Note 2	Hydrogen Sulphide	Quarterly Note 5	5 mg/m ³	Note 1
RRPV12, Note 2	Oxides of nitrogen (total acid forming as NO ₂)	Quarterly Note 5	100 mg/m ³	Note 1
RRPV12, Note 2	Organic sulphides and mercaptans (as methyl mercaptan)	Quarterly Note 5	2 mg/m ³	Note 1

Table 2.2.2 continued: Emission limits to air and monitoring. Emissions <u>NOT</u> regulated under Waste Incineration Directive				
RRPV12, Note 2	Phosgene	Quarterly Note 5	1 mg/m ³	Note 1
RRPV12, Note 2	Oxides of sulphur (as SO ₂)	Quarterly Note 5	100 mg/m ³	Note 1
RRPV12, Note 2	Special Volatile organic compounds	Quarterly Note 5 Note 6	5 mg/m ³	BS EN 1076:1997
RRPV12, Note 2	Class A Volatile organic compounds	Quarterly Note 5	20 mg/m ³ if release rate exceeds 100g/hr	BS EN 1076:1997
RRPV12, Note 2	Class B Volatile organic compounds (as carbon)	Quarterly Note 5	75 mg/m ³ if release exceeds 2 kg/hr	BS EN 13526
RRPV12, Note 2	Particulate Matter	Quarterly, Note 5	5 mg/m ³	BS EN 13284-1
RRPV12 Note 2	Boron trifluoride	Quarterly Note 4	5 mg/m ³	Note 1

Note 1: Using the following hierarchy of methods:- CEN if available, ISO if available, BS if available, US EPA if available, other validated method.

Note 2: These limits also apply to any other Authorised emission point listed specifically in a Process Briefing Note (as defined in the "Protocol For Changes In Production Runs And The Introduction Of New Processes", supplied with the Application), agreed by the Agency, for which no other limit for that substance and emission point appears in Table 2.2.2

Note 3: See Section 6 for reference conditions

Note 4: Monitoring is only required when a process with potential for a meaningful release of the specified parameters from the specified release point has been operated during the reporting period.

Note 5: The first batch of each process manufactured during the reporting period will be monitored if there is a likelihood of a meaningful release of the stated substance from the stated emission point.

Note 6: Any 'Special VOCs' must be specifically identified.

Note 7: The limit does not apply during start up or shutdown.

Note 8: The Operator may employ other alternative monitoring techniques for specific release points and determinands where this is agreed in writing in advance by the Agency. Any such alternative monitoring methods shall be those specified in section 2.10 of the Application, unless otherwise agreed in writing in advance by the Agency.

3. Table S2 to be amended as detailed in bold.

Table S2: Reporting of monitoring data NOT relating to the Waste Incineration Directive.				
Parameter	Emission points ^{Note 1}	Reporting period	Period begins	Notes
Amines (as dimethylamine)	RA6V19, RA6V20, RA6V28, RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Ammonia	NP2V1, NP2V2, NP5V10, NP7V5, NP8V8, NP8V9	Annual	01/10/04	
Amines (as dimethylamine)	NP2V1, NP2V2, NP5V10, NP7V5, NP8V8, NP8V9,	Annual	01/10/04	
Ammonia	RPPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Hydrogen chloride	NP2V1, NP2V2, NP5V10, NP7V5, NP8V8, NP8V9	Annual	01/10/04	
Hydrogen chloride	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Class B VOCs (as C)	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Class B VOCs as toluene	GO1	Quarterly	01/10/04	
Class A VOCs	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
'Special' VOCs	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Particulate matter	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Carbon disulphide	NP2V1, NP2V2, NP5V10, NP7V5, NP8V8, NP8V9	Annually	01/10/04	
Carbon disulphide	RA6V19, RA6V20, RA6V28, RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Organic sulphides and mercaptans	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Hydrogen sulphide	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Boron Trifluoride	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Fluorine	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Chlorine	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process

Table S2 continued: Reporting of monitoring data NOT relating to the Waste Incineration Directive.				
Bromine	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Hydrogen fluoride	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Hydrogen bromide	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Hydrogen cyanide	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Oxides of nitrogen	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Phosgene	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Oxides of sulphur	RRPV12	Quarterly	01/10/04	Monitoring for point RRPV12 may be required for more than one process
Acrylonitrile	NP2V1, NP2V2, NP5V10, NP7V5, NP8V8, NP8V9	Annually	01/10/04	
Particulate Matter	A1(a)	Quarterly	01/10/04	Note 2
Total organic carbon	A1(a)	Quarterly	01/10/04	Note 2
Hydrogen chloride	A1(a)	Quarterly	01/10/04	Note 2
Sulphur dioxide	A1(a)	Quarterly	01/10/04	Note 2
Oxides of nitrogen	A1(a)	Quarterly	01/10/04	Note 2
Carbon dioxide	A1(a)	Quarterly	01/10/04	Note 2
Hydrogen fluoride	A1(a)	Six monthly	01/07/04	Note 2
Carbon disulphide	A1(a)	Six monthly	01/07/04	
Hydrogen sulphide	A1(a)	Six monthly	01/07/04	
Organic sulphides and mercaptans	A1(a)	Six monthly	01/07/04	
Suspended solids	W1, W2, W3, S1, S2	Quarterly	01/10/04	
COD	W1, W2, W3, S1, S2	Quarterly	01/10/04	
pH range	W1, W2, W3, S1, S2	Quarterly	01/10/04	
Total metals (Zn, Cr, Pb, Cu, Ni)	W1, W2, W3, S1, S2	Quarterly	01/10/04	

Table S2 continued: Reporting of monitoring data NOT relating to the Waste Incineration Directive.				
Total mercury	W1, W2, W3, S1, S2	Quarterly	01/10/04	
Total discharge in quarter	W1, W2, W3	Quarterly	01/10/04	
No. of discharges in quarter	W1, W2, W3	Quarterly	01/10/04	
Total sulphides	S1	Quarterly	01/10/04	
Dithiocarbamates	S1	Quarterly	01/10/04	
Total cyanides	S1	Quarterly	01/10/04	
Waste Disposal and Recovery		Annual	01/01/04	
Water Usage		Annual	01/01/04	
Energy Usage		Annual	01/01/04	
Performance Indicators		Annual	01/01/04	

Note 1: Releases made under Project Briefing Notes to other release points must also be monitored, see table 2.2.2 and reporting forms A17 and A18.

Note 2: Reporting only required if the data is not fully captured within the WID reporting forms

Schedule 3 – conditions to be added

None.

Schedule 4 – amended plan

None.