

Variation notice with introductory note

Environmental Permitting (England & Wales) Regulations 2007

West Bromwich Chemical Works

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

Variation notice number
EPR/BS4316IV/V009

Permit number
EPR/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 S.I.2007 No. 3538 (the Regulations), gives notice of the variation of an environmental permit to operate a regulated facility.

This notice has been issued so as to:

1. Allow solid waste alkaline materials in the site effluent plant.
2. Add additional EWC codes for the incineration activity.
3. Provide a derogation from continuous SO₂ measurement for release point A1(e) under certain circumstances.

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	Dated 22/02/07

	09/03/07	
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	

End of Introductory Note

Notice of variation

**Environmental Permitting
(England and Wales) Regulations 2007**

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 **201053**

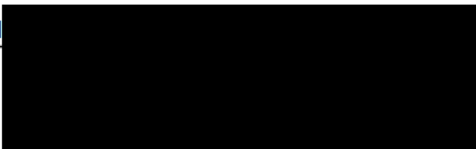
holds a permit to operate a regulated facility at

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 18th February 2010

Name	Date
	18 th February 2010

S Attwood - Permitting Team Leader, National Permitting Service

Authorised on behalf of the Environment Agency

Schedule 1 – conditions to be deleted

None.

Schedule 2 – conditions to be amended

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

Table 2.1.2: Permitted Waste Types

Emission point	Waste Type	Limitations	Maximum throughput at specified locations
A1(a)	Range of aqueous liquids, mother liquors, organic and non-halogenated organic solvents, halogenated and non-halogenated still bottoms and reaction residues. EWC 05 07 02, 07 01 01, 07 01 03, 07 01 04, 07 01 07, 07 01 08, 07 02 01, 07 02 03, 07 02 04, 07 02 07, 07 02 08, 07 03 01, 07 03 03, 07 03 04, 07 03 07, 07 03 08, 07 04 01, 07 04 03, 07 04 04, 07 04 07, 07 04 08, 07 05 01, 07 05 03, 07 05 04, 07 05 07, 07 05 08, 07 06 01, 07 06 03, 07 06 04, 07 06 07, 07 06 08, 07 07 01, 07 07 03, 07 07 04, 07 07 07, 07 07 08, 08 01 11, 08 01 12, 08 03 12, 08 03 13, 08 03 19, 08 04 09, 08 04 10, 09 01 03, 13 07 01, 13 07 02, 13 07 03, 16 03 05, 16 07 09, 19 02 08, 19 02 11, 19 12 11 and 20 01 03.	Specified in Applications for Variations GP3832SM and RP3532KB.	2,500 tonnes per annum
A1(e)	Range of non-halogenated materials. EWC 05 07 02, 07 01 01, 07 01 04, 07 01 08, 07 02 01, 07 02 04, 07 02 08, 07 03 01, 07 03 04, 07 03 08, 07 04 01, 07 04 04, 07 04 08, 07 05 01, 07 05 04, 07 05 08, 07 06 01, 07 06 04, 07 06 08, 07 07 01, 07 07 04, 07 07 08, 08 01 11, 08 01 12, 08 03 12, 08 03 13, 08 03 19, 08 04 09, 08 04 10, 09 01 03, 13 07 01, 13 07 02, 13 07 03, 16 03 05, 16 07 09, 19 02 08, 19 02 11, 19 12 11 and 20 01 03.	Specified in Applications for Variations NP3936ME and RP3532KB. And the additional information received on 09/03/2007.	4,380 tonnes per annum

Table 2.2.3 : Emission limits to air and monitoring. Waste Incineration Directive (WID) regulated emissions during normal operation

Emission point reference	Parameter	Limit (including Reference Period) ¹ from 28/12/05	Monitoring frequency	Monitoring method
A1(a), A1(e)	Particulate matter	30 mg/m ³ ½-hr average	Continuous measurement	BS EN 13284-2 ^{9 7}
A1(a), A1(e)	Particulate matter	10 mg/m ³ daily average	Continuous measurement	BS EN 13284-2 ^{9 7}
A1(a), A1(e)	Particulate matter	20 mg/m ³ periodic over minimum 1-hour period	Bi-annual	BS EN 13284-1
A1(a), A1(e)	Total Organic Carbon (TOC)	20 mg/m ³ ½-hr average	Continuous measurement	BS EN 12619 ^{9 7}
A1(a), A1(e)	Total Organic Carbon (TOC)	10 mg/m ³ daily average	Continuous measurement	BS EN 12619 ^{9 7}
A1(a), A1(e)	Total Organic Carbon (TOC)	20 mg/m ³ periodic over minimum 1-hour period	Bi-annual	BS EN 12619
A1(a), A1(e)	Hydrogen chloride Note 11	60 mg/m ³ ½-hr average	Continuous measurement	MCERTS certified instruments ^{10 8}
A1(a), A1(e)	Hydrogen chloride Note 11	10 mg/m ³ daily average	Continuous measurement	MCERTS certified instruments ^{10 8}
A1(a), A1(e)	Hydrogen chloride	30 mg/m ³ periodic over minimum 1-hour period	Bi-annual	BS EN 1911

Table 2.2.3 continued : Emission limits to air and monitoring. Waste Incineration Directive (WID) regulated emissions during normal operation

A1(e)	Hydrogen fluoride	4 mg/m ³ ½-hr average	Continuous measurement	MCERTS certified instruments ¹ 08
A1(e)	Hydrogen fluoride	1 mg/m ³ daily average	Continuous measurement	MCERTS certified instruments ¹ 08
A1(a) , A1(e)	Hydrogen fluoride	2 mg/m ³ periodic over minimum 1-hour period	Bi-annual	USEPA Method 26/26A
A1(a) , A1(e)	Carbon monoxide	100 mg/m ³ ½-hr average	Continuous measurement	ISO 12039 ^{9,5}
A1(a) , A1(e)	Carbon monoxide	50 mg/m ³ daily average	Continuous measurement	ISO 12039 ^{9,5}
A1(a) , A1(e)	Carbon monoxide	100 mg/m ³ periodic over minimum 4 hour period, data to be reported as ½-hour averages	Bi-annual	ISO 12039
A1(a) , A1(e)	Sulphur dioxide	200 mg/m ³ ½-hr average	Continuous measurement ¹²	BS 6069-4.49 6
A1(a) , A1(e)	Sulphur dioxide	50 mg/m ³ daily average	Continuous measurement ¹²	BS 6069-4.49 6
A1(a) , A1(e)	Sulphur dioxide	200 mg/m ³ periodic over minimum 4 hour period, data to be reported as ½ hour avs	Bi-annual	BS 6069-4.1
A1(a) , A1(e)	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	400 mg/m ³ daily average	Continuous measurement	ISO 108499 6

A1(a) , A1(e)	Oxides of nitrogen, expressed as NO2	500 mg/m3 100% of half hourly averages over year	Continuous measurement	ISO 108499 6
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Table 2.2.3 continued : Emission limits to air and monitoring. Waste Incineration Directive (WID) regulated emissions during normal operation

A1(a) , A1(e)	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	400 mg/m ³ periodic over minimum 4 hour period, data to be reported as ½ hour averages	Bi-annual	ISO 10849 or BS ISO 11564
A1(a) , A1(e)	Cadmium & thallium and their compounds (total) ³	0.05 mg/m ³ periodic over minimum 30 minute, maximum 8 hour period	Bi-annual	BS EN 14385
A1(a) , A1(e)	Mercury and its compounds ³	0.05 mg/m ³ periodic over minimum 30 minute, maximum 8 hour period	Bi-annual	BS EN 13211
A1(a) , A1(e)	Sb, As, Pb, Cr, Co, Cu, Mn, Ni and V and their compounds (total) ³	0.5 mg/m ³ periodic over minimum 30 minute, maximum 8 hour period	Bi-annual	BS EN 14385
A1(a) , A1(e)	Dioxins / furans (I-TEQ)	0.1 ng/m ³ periodic over minimum 6 hours, maximum 8 hour period ⁴	Bi-annual	BS EN 1948

Note 1: See Section 6 for reference conditions

Note 2: No condition applies.

Note 3: Metals include gaseous, vapour and solid phases as well as their compounds (expressed as the metal or the sum of the metals as specified). Sb, As, Pb, Cr, Co, Cu, Mn, Ni and V mean antimony, arsenic, lead, chromium, cobalt, copper, manganese, nickel and vanadium respectively.

Note 4: The I-TEQ sum of the equivalence factors to be reported as a range based on: All congeners less than the detection limit assumed to be zero as a minimum, and all congeners less than the detection limit assumed to be at the detection limit as a maximum.

Note 5: The Continuous Emission Monitors used shall be such that the values of the 95% confidence intervals of a single measured result at the daily emission limit value shall not exceed 10%. Valid half-hourly average values shall be determined within the effective operating time (excluding the start-up and shut-down periods if no waste is being incinerated) from the measured values after having subtracted this value of the confidence interval (10%). Where it is necessary to calibrate or maintain the monitor and this means that data is not available for a complete half-hour period, the half-hourly average shall nonetheless be considered valid if measurements are available for a minimum of 20 minutes during the half-hour period. (The number of half-hourly averages so validated shall not exceed 5 (or such other number justified in the Application for variation) per day). Daily average values shall be determined as the average of all the valid half-hourly average values within a calendar day. The daily average value will be considered valid if no more than five half-hourly average values in any day have been determined not to be valid. No more than ten daily average values per year shall be determined not to be valid.

Note 6: As Note 5, except that the value of the confidence interval is 20% in place on 10%.

Note 7: As Note 5, except that the value of the confidence interval is 30% in place on 10%.

Note 8: As Note 5, except that the value of the confidence interval is 40% in place on 10%.

Note 9: MCERTS certification to the appropriate ranges and determinands is a demonstration of compliance to the applicable standards.

Note 10: The certification range for MCERTS equipment should be 1.5 times the daily emission limit value.

Note 11: If the continuous hydrogen chloride monitor is not operating, the operator may then use the analytical method described in the additional information received on 21/02/07, to demonstrate compliance. If the operator cannot demonstrate that every batch of waste fed to the incinerator or Ruston boiler contains insufficient chlorine to breach the continuous limits for hydrogen chloride assuming complete conversion, then waste feed to the Incinerator and Ruston boiler shall cease.

Note 12: In the event that the continuous emissions monitor for release point A1(e) becomes temporarily unavailable due to breakdown or malfunction, compliance with the emission limit values for sulphur dioxide shall be demonstrated through analysis of wastes together with calculated emissions. In such an event the Operator shall inform the Environment Agency of the breakdown or malfunction within five days, and shall also inform the Environment Agency of the renewed operation of the monitor within five days.

Schedule 6 – List of Permitted Wastes

Permitted Waste Types		
Description	European Waste Catalogue Number (where available) or other specification	Waste type as defined in Table 2.1.2
Range of aqueous liquids, solvents and reaction residues from chemical manufacturing and distribution processes. Emission point A(1)(a)	EWC 05 07 02, 07 01 01, 07 01 03, 07 01 04, 07 01 07, 07 01 08, 07 02 01, 07 02 03, 07 02 04, 07 02 07, 07 02 08, 07 03 01, 07 03 03, 07 03 04, 07 03 07, 07 03 08, 07 04 01, 07 04 03, 07 04 04, 07 04 07, 07 04 08, 07 05 01, 07 05 03, 07 05 04, 07 05 07, 07 05 08, 07 06 01, 07 06 03, 07 06 04, 07 06 07, 07 06 08, 07 07 01, 07 07 03, 07 07 04, 07 07 07, 07 07 08, 08 01 11, 08 01 12, 08 03 12, 08 03 13, 08 03 19, 08 04 09, 08 04 10, 09 01 03, 13 07 01, 13 07 02, 13 07 03, 16 03 05, 16 07 09, 19 02 08, 19 02 11, 19 12 11 and 20 01 03.	
Range of non-halogenated organic materials. Emission point A(1)(e)	EWC 05 07 02, 07 01 01, 07 01 04, 07 01 08, 07 02 01, 07 02 04, 07 02 08, 07 03 01, 07 03 04, 07 03 08, 07 04 01, 07 04 04, 07 04 08, 07 05 01, 07 05 04, 07 05 08, 07 06 01, 07 06 04, 07 06 08, 07 07 01, 07 07 04, 07 07 08, 08 01 11, 08 01 12, 08 03 12, 08 03 13, 08 03 19, 08 04 09, 08 04 10, 09 01 03, 13 07 01, 13 07 02, 13 07 03, 16 03 05, 16 07 09, 19 02 08, 19 02 11, 19 12 11 and 20 01 03.	
Range of solid and liquid waste alkaline materials for use as reagent on effluent plant. Emission point S1.	EWC 06 02 01, 06 02 04, 06 02 05, 06 02 99, 07 01 01, 07 01 11, 07 01 12, 07 01 99, 07 02 01, 07 02 11, 07 02 12, 07 02 99, 07 03 01, 07 03 11, 07 03 12, 07 03 99, 07 04 01, 07 04 11, 07 04 12, 07 04 99, 07 05 01, 07 05 11, 07 05 12, 07 05 99, 07 06 01, 07 06 11, 07 06 12, 07 06 99, 07 07 01, 07 07 11, 07 07 12, 07 07 99, 16 03 03, 16 03 04, 16 03 05, 16 03 06, 16 05 07, 16 05 08, 16 05 09, 16 10 01, 16 10 02, 16 10 03 and 16 10 04.	

Aqueous wastes from EWC 05 07 02, 16 07 09
distribution of gas
odorant products for
disposal through
effluent treatment
plant

Schedule 3 – conditions to be added

None.

Schedule 4 – amended plan

None.