

Environment Agency permitting decisions

Variation

We have decided to issue the variation for PPG Fibre Glass Wigan operated by PPG Industries (UK) Ltd.

The variation number is EPR/BR5213IG/V003

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Structure of this document

- Key issues
- Annex 1 the decision checklist

Key issues of the decision

Mercury Limit

A mercury limit was initially placed within the original permit for emissions to sewer due to a high mercury content within the caustic chemical used for cleaning. The operator now uses a caustic solution containing low levels of mercury and requests the discharge limit to be removed from the site permit.

The estimated volume of caustic solution is 400 litres per annum, with a 0.05ppm w/w mercury, the annual kg mercury with these volumes and concentration would be considerably less than the original consent limit of 0.1kg per annum.

The previous water quality data shows that mercury levels have not exceeded 0.04 µg/l within the last 12 months, one breach of consent noted 06/09/2010, schedule 1 form submitted to the Environment Agency. The investigation identified that caustic soda liquor was used for a tank clean (against standard practice), a meeting with utilities regulatory controller was held and an action plan developed to prevent recurrence.

PPG Wigan disposes wastewater to United Utilities (UU), a mercury limit is set on discharge from PPG to UU within the trade effluent consent at 0.3µg/l, an additional mercury monitoring point identical to the original permit consent limit.

In summary the only raw material containing mercury has been replaced with a similar product containing a much lower concentration of mercury and PPG Wigan have mercury discharge consents to the trade effluent processor UU. It is therefore deemed unnecessary to continue with the discharge consent limit and reporting requirements for the site.

Operating Techniques and Management Techniques

Consolidation of a number of processes has occurred on site since the original permit was issued in 2003, including simplification of the product range from four to one product. The operator has provided a substantial update of operating techniques, organogram and management responsibilities from the sites EMS (refer to 'PPG Application to vary Permit BR5213IG' for full details).

Improvement Conditions

All improvement conditions have been completed since original permit was issued in 2003, confirmed by the sites PPC officer 19/9/12.

In June 2011 the Environment Agency recommended a BAT review for the sites ovens. ELV's for air emissions within the original permit do not reflect current BREF and Environment Agency guidance. To ensure ongoing

compliance a requirement for a BAT review has been added as an additional improvement clause to be completed within 12 months of permit issue.

Emissions to Air

Emission points related to old drying ovens and Mat Line have been removed and those for new ovens installed. The Di-electric and gas fired oven cannot be used at the same time as the amount of yarn is limited by the furnace production (furnaces 501 & 502). The VOC emission limits in the permit (1kg/tonne glass dried) and particulates (20mg/m³) will not require amending as a result of the variation.

On 17th Oct 2008 a minor operational change was approved by the Environment Agency to install 2 di-electric ovens and new emission point. A technical review of the air emissions following the operational change was completed on 30th July 2012, illustrating the air quality improvements from di-electric ovens in comparison with gas fired ovens.

Table 6.1.1 has been updated to differentiate the air emission points from Di-electric ovens.

An updated emissions to air site plan was submitted with the application.

Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/ notice.

| Aspect considered | Justification / Detail | Criteria met |
|------------------------------------|---|--------------|
| | | Yes |
| Operator | | |
| Control of the facility | We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator. | ✓ |
| European Directives | | |
| Applicable directives | All applicable European directives have been considered in the determination of the application. | ✓ |
| The site | | |
| Extent of the site of the facility | The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility. A plan is included in the permit and the operator is required | ✓ |

| Aspect considered | Justification / Detail | Criteria met |
|-------------------|--|--------------|
| | | Yes |
| | to carry on the permitted activities within the site boundary. | |

Environmental Risk Assessment and operating techniques

| | | |
|----------------------|---|---|
| Operating techniques | We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. The oxygen plant was added as a DAA to Manufacture of continuous monofilament glass fibre; Section 3.3 A (1)(a). | ✓ |
|----------------------|---|---|

The permit conditions

| | | |
|-------------------------------|--|---|
| Incorporating the application | We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process. These descriptions are specified in the Operating Techniques table in the permit. | ✓ |
| Emission limits | The following substances have no longer been identified as being emitted in significant quantities and equivalent parameters have been removed for those substances; Mercury µg/l and Mercury Kg/year | ✓ |
| Monitoring | We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. Mercury levels in wastewater will be monitored by united utilities prior to discharge, eliminating the need for the operator to continue to monitor onsite. | ✓ |
| Reporting | We have specified reporting in the permit. The reporting requirement for mercury levels in effluent discharge has been removed from the permit, due to the elimination of a mercury discharge limit for the site. Levels of mercury will be monitored and recorded by United Utilities. | ✓ |
| Improvement conditions | Based on the information on the application, we consider that we need to impose improvement conditions. | ✓ |

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|-------------------------------|---|---|
| | <p>We have imposed a new improvement condition:</p> <p>In particular regards to air emissions from ovens, to assess compliance with all relevant legislation and guidance the operator shall carry out a BAT review.</p> | |
| Operator Competence | | |
| Environment management system | <p>There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.</p> | ✓ |