

# Surrender notice and notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

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M & I Materials Limited

Apiezon Plant  
Hibernia Way  
Trafford Park  
Manchester  
M32 0ZD

**Partial surrender number**

EPR/BS4952IP/S002

**Variation application number**

EPR/BS4952IP/V003

**Permit number**

EPR/BS4952IP

# Apiezon Plant

## Permit number EPR/BS4952IP

### Introductory note

#### **This introductory note does not form a part of the notice.**

The following notice gives notice of the surrender in part and variation of an environmental permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. All the conditions of the permit have been varied and are subject to the right of appeal.

The partial surrender aspect of this document (reference EPR/BS4952IP/S002) reduces the size of the installation permitted boundary on the site plan, removing specific areas where existing activities have now been relocated to other areas of the site. Areas removed from the permit boundary are:

- the area of the main goods inwards stores with all materials delivered and handled local to the Apiezon plant.
- the former waste storage area.

The accompanying variation (reference EPR/BS4952IP/V003) amends the permit to increase the size of the installation permitted boundary on the site plan, adding specific new areas. Areas added are:

- an area where individual road tankers will be situated when offloading naphthenic process oil into an existing bulk storage tank located within the Apiezon process building. This is an existing process. The process for offloading of these oils is not changing because of this variation.
- the new waste storage area.
- a transfer route between the Apiezon Plant and the new waste storage area.

The variation also updates the permit to reflect site and process improvements that have reduced risks to the environment and are already in existence. These include:

- replacing the town's water single pass cooling system which previously discharged to sewer with a self-contained closed loop water cooling system.
- replacing older pumps by quieter, more reliable rotary vane pumps,
- replacing an older manually controlled process control panel on Still 2 with a new programmable logic controller (PLC). The PLC system controls the temperature by regulating the current delivered to the heaters in a proportional closed loop control system.
- addition of the release point to air, A1, into Table S3.1 as the local exhaust ventilation (LEV) extraction from bitumen melting plant and vacuum pump exhausts.

The overall operation of the Apiezon Plant is unchanged by this partial surrender and variation and continues in the following manner.

The Apiezon Manufacturing area is located within M&I Materials' Hibernia Way facility adjacent to the MIDEL plant. The area is divided into several smaller zones where the various manufacturing, packaging and warehousing operations are carried out.

Raw materials used in the distillation process include petroleum oils and petroleum jellies.

There are two main stills which are used for the molecular distillation of refined petroleum products to make speciality oils and greases for the vacuum industry. Still No. 1 is used for the distillation of

pharmaceutical grade yellow petroleum jelly to make two products directly. A second use for this still is to produce a heavy base oil which can be thickened to make different grades of grease. The feedstock for this is a viscous steam cylinder oil without additives. The output is 3 to 6 kg per day and typical yields are 10% by mass. The grease is collected into tins as intermediate product.

Still No. 2 is very similar to Still No. 1 but is used to make only one product – a vapour booster pump oil. The feedstock is a naphthenic process oil which is split into four fractions during distillation. The volatile components and heavy fractions are discarded, and the middle fractions recombined to make the oil which has an antioxidant dissolved in it. The yield is about 60-65% based on an output of about 60kg per day.

The heavy distilled steam cylinder oil produced on Still No. 1 is formulated in the grease plant – a small vacuum chamber that can be equipped with different mixers and degassing arrangements and has dedicated mixing vessels for each grease. The batch size is about 3 kg and only one product can be made per week using this equipment. On the bench adjacent to this unit, there are various over-head mixers which make about 1litre of a pre-mixed solution. Two wax products are also made here, where the heavy oil is blended with bitumen.

A local extraction system serves to remove vapours from the bitumen melting plant and vacuum pump exhausts for the protection of workers present in those areas.

There are no aqueous releases from the process following the closed loop cooling water system replacing the once through cooling system which had previously given rise to emissions to sewer. Raw materials are stored in bunded areas. There are no releases to groundwater and the waste produced is less than 1 tonne per day. Waste produced includes waste petroleum jellies and oils.

This activity meets the Environment Agency's criteria for a low impact installation as the potential for impact to the environment is inherently low.

The site is located in the Trafford Park industrial estate. There are a number of ecological sites located close to the site:

- Manchester Mosses (Special Area of Conservation) are located approximately 8.5 km west of the site.
- The Trafford Ecology Park Local Nature Reserve and Trafford Park Lake Local Wildlife Site are located approximately 1.3 km north of the site.
- The Bridgewater Canal Local Wildlife Site is directly adjacent to the site.

Any changes made as a result of the partial surrender (EPR/BS4952IP/S002) and variation (EPR/BS4952IP/V003) are specified in the schedules.

We consider that in reaching our decision to vary the permit we have taken into account all relevant considerations and legal requirements. We are satisfied that the permit will ensure that a high level of protection is provided for the environment and human health and that the activities will not give rise to any significant pollution of the environment or harm to human health.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application BS4952	06/09/2002	
Response to request for further information dated 11/09/2002	11/09/2002	
Permit determined	27/01/2003	Permit issued to M & I Materials Limited
Part surrender application EPR/BS4952IP/S002 and variation consolidation application EPR/BS4952IP/V003	Duly made 24/07/2022	Application to: - surrender a specific area of the permit boundary including the main goods inwards stores and former waste storage area. - vary the permit to increase the permitted boundary in order to add the new waste storage area, oil tanker offloading area and route from Apiezon plant to waste storage area.
Additional information received	16/08/2022	Additional information on location of release point, A1.
Additional information received	24/08/2022	Additional information received on discharge of uncontaminated surface water from site.
Part surrender determined EPR/BS4952IP and variation determined and consolidation issued EPR/BS4952IP (Billing Ref: HP3704MJ)	20/10/2022	Part surrender complete. Varied and consolidated permit issued in a modern format.

<b>Other Part A installation permits relating to this installation</b>		
<b>Operator</b>	<b>Permit number</b>	<b>Date of issue</b>
M & I Materials Limited	EPR/BP3930JC	31/05/2018
M & I Materials Limited	EPR/BP9640IM	26/01/2004

End of introductory note

# Notice of surrender

## The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 and 25 of the Environmental Permitting (England and Wales) Regulations 2016 accepts the surrender in part and varies

### Permit number

**EPR/BS4952IP**

### Issued to

**M & I Materials Limited** (“the operator”)

whose registered office is

**Hibernia Way  
Trafford Park  
Manchester  
M32 0ZD**

company registration number 02772838

to operate a regulated facility at

### Apiezon Plant

**Hibernia Way  
Trafford Park  
Manchester  
M32 0ZD**

to the extent set out in the schedules.

This notice shall take effect from 20/10/2022.

Name	Date
Vicky Patchett	20/10/2022

Authorised on behalf of the Environment Agency

**Schedule 1 – changes to the permit**

All conditions have been varied by the consolidated permit as a result of the applications made by the operator.

**Schedule 2 – consolidated permit**

Consolidated permit issued as a separate document.

# Permit

## The Environmental Permitting (England and Wales) Regulations 2016

### Permit number

**EPR/BS4952IP**

This is the consolidated permit referred to in the surrender notice for application EPR/BS4952IP/S002 and variation and consolidation notice for application EPR/BS4952IP/V003 authorising,

**M & I Materials Limited** ("the operator"),

whose registered office is

**Hibernia Way  
Trafford Park  
Manchester  
M32 0ZD**

company registration number 02772838

to operate an installation at

**Apiezon Plant**

**Hibernia Way  
Trafford Park  
Manchester  
M32 0ZD**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
<b>Vicky Patchett</b>	<b>20/10/2022</b>

Authorised on behalf of the Environment Agency

# Conditions

## 1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
  - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

## 1.2 Energy efficiency

- 1.2.1 The operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
  - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
  - (c) take any further appropriate measures identified by a review.

## 1.3 Efficient use of raw materials

- 1.3.1 The operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
  - (b) maintain records of raw materials and water used in the activities;
  - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
  - (d) take any further appropriate measures identified by a review.

## 1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
  - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
  - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.



## **2 Operations**

### **2.1 Permitted activities**

2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

### **2.2 The site**

2.2.1 The activities shall not extend beyond the site, being the land shown edged in red on the site plan at schedule 7 to this permit.

### **2.3 Operating techniques**

2.3.1 The activities shall, subject to the conditions of this permit, be operated in accordance with the Low Impact Installation criteria specified in the Environment Agency’s Environmental Permitting application form at the time the permit application was duly made.

## **3 Emissions and monitoring**

### **3.1 Emissions to water, air or land**

3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 table S3.1.

3.1.2 The limits given in schedule 3 shall not be exceeded.

3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

### **3.2 Emissions of substances not controlled by emission limits**

3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

3.2.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
- (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

### **3.3 Odour**

3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

3.3.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
- (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

### **3.4 Noise and vibration**

3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

3.4.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

## **4 Information**

### **4.1 Records**

4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
  - (i) off-site environmental effects; and
  - (ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

### **4.2 Reporting**

4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 A report on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report shall include as a minimum, a review of the results of the actual and anticipated operation of the installation against the low impact criteria issued by the Environment Agency at the time of the review.

## 4.3 Notifications

### 4.3.1 In the event:

- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
  - (i) inform the Environment Agency,
  - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
  - (iii) take the measures necessary to prevent further possible incidents or accidents;
- (b) of a breach of any permit condition the operator must immediately—
  - (i) inform the Environment Agency, and
  - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) the Environment Agency shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

- 4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.
- 4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
- (a) a decision by the Secretary of State not to re-certify the agreement;
  - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
  - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

## **4.4 Interpretation**

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

# Schedule 1 – Operations

<b>Table S1.1 activities</b>			
<b>Activity reference</b>	<b>Activity listed in Schedule 1 of the EP Regulations</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
AR1	S1.2 A (1) (f) (iii) Activities involving the pyrolysis, carbonisation, distillation, partial oxidation or other heat treatment of oil.	Distillation of petroleum oils and jellies	The distillation process including handling of raw materials and collection of finished product.
<b>Directly Associated Activity</b>			
AR2	The receipt and storage of raw materials.	The receipt and storage of raw materials prior to use on site.	From delivery, storage and transfer to processing. Drains to foul sewer but not including the interceptor.
AR3	The segregation and storage of waste products.	Segregation and storage of waste pending disposal/recovery off-site.	From collection of waste and storage of waste on site to removal of waste from site.

## Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
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## Schedule 3 – Emissions and monitoring

<b>Table S3.1 Point source emissions to air – emission limits and monitoring requirements</b>						
<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (including unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
A1 [Point A1 on site plan in Schedule 7]	LEV extraction from bitumen melting plant and vacuum pump exhausts.	Volatile organic compounds (VOCs)	--	--	--	--

# Schedule 4 – Reporting

There is no reporting under this schedule.



# Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

## Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

<b>(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution</b>	
<b>To be notified within 24 hours of detection</b>	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

<b>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

<b>Time periods for notification following detection of a breach of a limit</b>	
<b>Parameter</b>	<b>Notification period</b>

<b>(c) Notification requirements for the breach of permit conditions not related to limits</b>	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

<b>(d) Notification requirements for the detection of any significant adverse environmental effect</b>	
<b>To be notified within 24 hours of detection</b>	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

## **Part B – to be submitted as soon as practicable**

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
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Post	
Signature	
Date	

\* authorised to sign on behalf of the operator

## Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

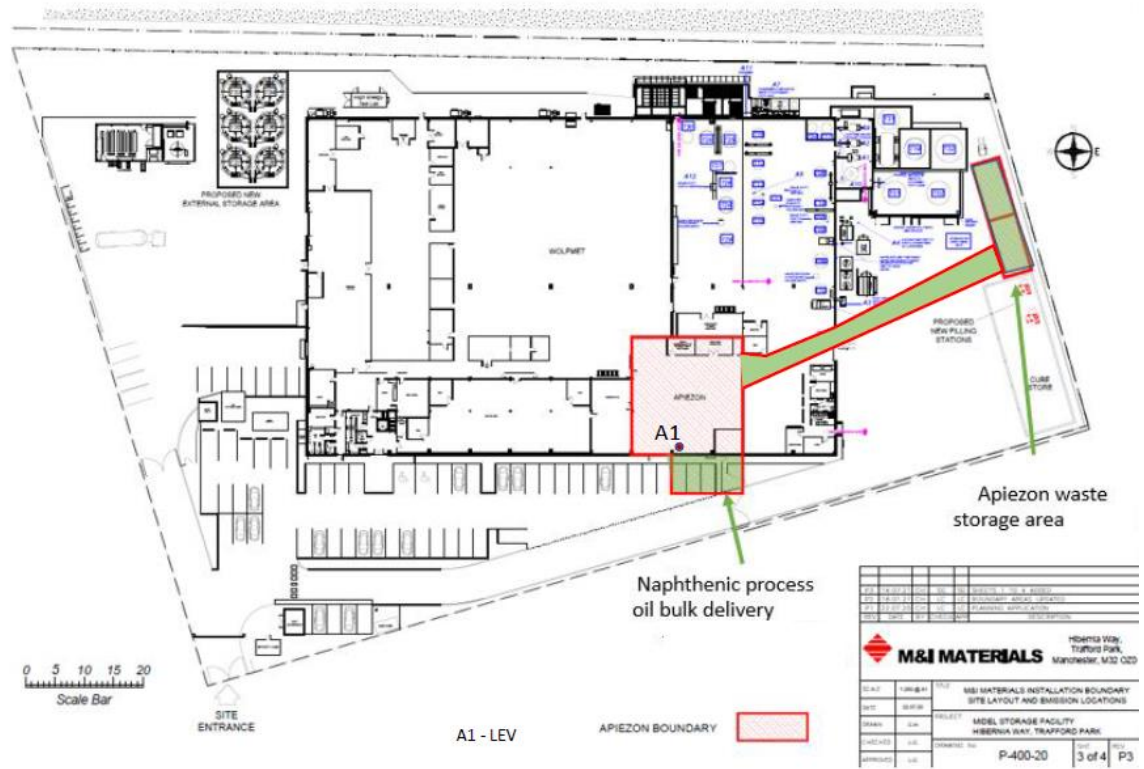
“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“year” means calendar year ending 31 December.

# Schedule 7 – Site plan



END OF PERMIT