

## Permitting decisions- Standard Rules Permit

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We have decided to grant the permit for M & I Materials Centenary Way Apiezon Installation operated by M & I Materials Limited.

The permit number is EPR/QP3328SE.

The permit was granted on 04/04/2024.

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 provides a record of the decision making process. It:

- highlights key issues in the determination;
- summarises the decision making process in the decision considerations section to show how the main relevant factors have been taken into account.

Read the permitting decisions in conjunction with the environmental permit.

## Key issues of the decision

The site has a local exhaust ventilation system for protection of the workforce. The operator assessed the volatile organic compounds (VOCs) released to atmosphere from this vent in the permit application, to demonstrate that they screen out as 'insignificant' as required in the low impact installation standard rules criteria.

Using benzene as a proxy for all VOCs released, the emissions did not screen out as 'insignificant' based on Process Contribution (PC). Although they screened out as 'not significant' based on Predicted Environmental Concentration (PEC) when background levels of VOCs were considered, this was not sufficient to meet the criteria for a standard rules low impact installation permit.

The operator subsequently carried out speciated analyses of the VOCs present in the emissions from the vent. Using these analyses and suitable proxy compounds where particular VOCs did not have documented Environmental Assessment Levels (EALs), the VOC emissions now screened out as 'insignificant'.

The following VOCs were detected in the vent discharge:

- 2,3-dimethylbutane,
- 2-methylpentane,
- 3-methylpentane,
- Acetone,
- Propane,
- Toluene.

The combined releases of 2,3-dimethylbutane, 2-methylpentane and 3-methylpentane were assessed as if they all were n-hexane. The release of propane was assessed as if it was butane.

Parameter	L/T Conc (mg/m <sup>3</sup> )	L/T PC	L/T EAL (µg/m <sup>3</sup> )	%PC/ EAL	S/T Conc (mg/m <sup>3</sup> )	S/T PC	S/T (EAL) (µg/m <sup>3</sup> )	%PC/ EAL
2,3-dimethylbutane	0.725	0.114			0.87	3.60		
2-methylpentane	1.59	0.249			1.9	7.85		
3-methylpentane	0.58	0.091			0.62	2.56		
<b>n-hexane</b>	<b>2.895</b>	<b>0.454</b>	<b>720</b>	<b>0.063</b>	<b>3.39</b>	<b>14.01</b>	<b>21600</b>	<b>0.064861</b>
<b>acetone</b>	<b>0.5</b>	<b>0.078</b>	<b>18100</b>	<b>0.00043</b>	<b>0.5</b>	<b>2.067</b>	<b>362000</b>	<b>0.000571</b>
propane	1.24	0.195			1.24	5.13		
<b>butane</b>	<b>1.24</b>	<b>0.195</b>	<b>14500</b>	<b>0.00134</b>	<b>1.24</b>	<b>5.13</b>	<b>181000</b>	<b>0.002834</b>
<b>toluene</b>	<b>2.56</b>	<b>0.402</b>	<b>260</b>	<b>0.15462</b>	<b>3.67</b>	<b>15.17</b>	<b>800</b>	<b>1.89625</b>

We have assessed toluene emissions using:

- The updated long term EAL of 260µg/m<sup>3</sup> now included in our web guidance and
- The short term EAL of 800µg/m<sup>3</sup> which we have accepted is correct, although our web guidance still references the previous EAL of 8,000µg/m<sup>3</sup>.

## **Decision considerations**

### **Standard rules criteria check**

The application meets the criteria for the standard rules applied for.

### **Confidential information**

A claim for commercial or industrial confidentiality has not been made.

The decision was taken in accordance with our guidance on confidentiality.

### **Identifying confidential information**

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

### **Consultation**

The application was publicised on the GOV.UK website.

### **Operator**

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 our guidance on legal operator for environmental permits.

### **Extent of the site of the facility**

The operator has provided a plan which we consider to be satisfactory.

These show the extent of the site of the facility including discharge points.

## **Site condition report**

The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.

In accordance with our guidelines for Standard Rules permits, we have not carried out a detailed assessment of the submitted Site Condition Report. The criteria required to meet the standard rules conditions should also ensure the facility has a low risk of pollution of soil and/or groundwater.

## **Management system**

We are not aware of any reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.

## **Previous performance**

We have assessed operator competence. There is no known reason to consider the applicant will not comply with the permit conditions.

## **Financial competence**

There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.

## **Growth duty**

We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit. The conditions imposed under the permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution and are based on our risk assessment undertaken at the time the Rules were made.

Application of the Rules to this activity promotes economic growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.