

Natural Resources Wales permitting decisions

Variation

We have decided to issue the variation for Pont-y-Felin Insulation works operated by Knauf Insulation Ltd

The variation **EPR/BR8212IK/V005**

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

This variation to the environmental permit corrects errors previously brought into the last variation (which was the IED Sector Review). For clarity this variation corrects those issues and consolidates the permit. The following items have been amended in this variation;

- Condition 3.1.3 in the permit has been amended to read;
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 systematic appraisal for the risk of contamination.

- The monitoring standard/method by which air emissions are monitored has been changed to; *Unless otherwise agreed in writing with Natural Resources Wales, Monitoring methods used shall be in accordance with Environment Agency document “Technical Guidance Note M2 Monitoring of stack emissions to air”.*
- A footnote has been amended in the air emission monitoring table in relation to monitoring equipment and reads; *Note 4:CEM’s which meet the MCERTS requirements should also follow the principles of EN 14181 (i.e. QAL2/AST and QAL3) but a reduced number of parallel measurements may be accepted (subject to NRW approval)*
- A note has been added to Schedule 6 – Interpretation, to explain Note 4 of the emission to air table (as mentioned above); *BS EN 14181 is applicable to large combustion plant (LCP) and waste incineration installations (WID) under the international Industrial Emissions Directive standard (IED). For other processes that are not classified as being WID or LCP, the monitoring standards for Continuous Emission Monitoring Systems (CEMS) should follow the principles of BS EN 14181 (i.e. QAL1, QAL2/AST & QAL3); however these procedures may be modified with written agreement from NRW. Further guidance on BS EN 14181, and its application, is contained in Environment Agency Technical Guidance Note [M2 – Monitoring of stack emissions to air](#).*

Improvement Conditions

It was necessary to impose the following improvement condition on the operator to ensure environmental compliance;

IC5	<p>If storing Priority Hazardous Substances on site, the Operator must carry out the following assessments with reference to the Environment Agency's guidance document H1 Annex D1 'Assessment of hazardous pollutants within surface water discharges',</p> <ul style="list-style-type: none">• Phase 1 Part A screening tests for mercury, cadmium, nickel, lead, benzene, polyaromatic hydrocarbons and any other relevant substances.• Phase 1 Part B screening tests for mercury, cadmium, polyaromatic hydrocarbons and any other relevant priority hazardous substances. For any substance which is not screened out by the Phase 1 Part A or Part B screening tests the Operator will also need to carry out Phase 2 modelling, as described in H1 Annex D1.
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The Operator must provide Natural Resources Wales with the results of the emissions monitoring, the results from the screening tests and the results from any Phase 2 modelling. The Operator may use the Environment Agency's H1 electronic screening tool to present the emissions data and to carry out the Phase 1 screening tests.

Note: With regard to the Phase 1 Part A screening - a full list of relevant substances is provided in Tables 1 and 2 of Appendix 1 of the Environment Agency's H1 Annex D1 guidance. The Operator must review the list and carry out the screening for any substances, in addition to those specified in the notice, that may be present in the installations discharges to surface water. With regard to the Phase 1 Part B screening for priority hazardous pollutants, Table 1 in section 2.3.2 of H1 Annex D1 provides a full list of relevant priority hazardous substances and their associated annual significant loads.

Emission Limit Values

The operator carried out volumetric flow analysis on emission point A3; this was due to the emissions from 3 different processes (forming fans, curing ovens, cooling zone) converging and being emitted through a common emission point. The operator obtained contributing percentages from each process, (forming fans - 72% flow, curing ovens – 17%, cooling zone – 11%) These figures were then used to ratio the parameters and give specific emission limit values (ELV). These values are shown in the table below;

Parameter	Current Permit (A3)	Ovens	Cooling/Forming etc.	Combined ELV	Rounded	Decision
PM	35	5.1	41.5	46.6	47	Retain ELV
Phenol	10	0.85	8.3	9.15	9	New ELV
Formaldehyde	5	5	5	5	5	Retain ELV
Ammonia	50	60	60	60	60	Retain ELV
VOC	35	1.7	24.9	26.6	27	New ELV
Amines	No Limit Set	0.35	2.49	2.86	3	Retain ELV

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
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	<p>The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility including discharge points.</p> <p>A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.</p>
Environmental Risk Assessment and operating techniques	
EIA	In determining the application we have considered the Environmental Statement.
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p>
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.</p> <p>The proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the facility.</p> <p>We consider that the emission limits included in the permit reflect the BAT for the installation.</p>

Aspect considered	Justification / Detail
The permit conditions	
Improvement conditions	<p>Based on the information on the application, we consider that we need to impose improvement conditions.</p> <p>We have imposed improvement conditions to ensure that: compliance is achieved Please see Key Issues section for full details</p>
Incorporating the application	<p>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.</p>
Emission limits	<p>We have decided that emission limits should be set for the parameters listed in the permit.</p> <p>Please see Key Issues section for full details</p>
Monitoring	<p>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.</p> <p>These monitoring requirements have been imposed in order to comply with BAT .</p>
Reporting	<p>We have specified reporting in the permit.</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>