Natural Resources Wales permitting decisions

Variation

We have decided to issue the variation for TRW Limited operated by TRW Limited.

The variation number is EPR/DP3430LX/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

Background

This variation allows the operation of a new zinc anodising process with an aggregated treatment tank volume of 12m^3. The addition of this process takes the overall aggregated capacity of all treatment tanks on the site to 262m^3. The variation also increases the installation boundary to incorporate the entire footprint of the TRW Limited factory, instead of incorporating only the equipment associated with carrying on the listed activities which was previously the case.

Finally, this variation also removes from the permit several of the air emission points associated with the existing process as these points do not vent to the external atmosphere. It also amends the references given to some emission points to describe more accurately their purpose in the process.

Site condition report

The operator has provided a site condition report with the application which satisfactorily evidences the condition of the additional areas of the factory that are included in the installation boundary. The factory floor is constructed from 300mm thick concrete.

Environmental risk

Based on data from the existing anodising processes on site and composition and concentration of the treatment liquors, the operator considers that emissions to air are likely to be insignificant. The process will utilise sulphuric acid and no nitric acid will be used in the treatment tanks. The H1 assessment indicated that releases to air will not have a significant effect on the environment.

The rinse waters from the treatment tanks will be treated in the site's effluent treatment plant before being discharged to sewer via emission point S1. The operator has assessed the impact of the additional load on the effluent treatment plant and has determined that the combined treatment requiring is well within the operating limits of the plant. Emissions to sewer are controlled by emission limit values for a variety of substances, and are also subject to a Dwr Cymru Welsh Water discharge consent. The H1 assessment indicated that releases to water will not have a significant effect on the environment.

The permit's monitoring requirements for emissions to sewer remain unchanged following this variation.

There are procedures within the operator's environmental management system that describe storage and handling techniques for prevention of spillages. All storage and handling takes place within bunded areas. The anodising process

will be installed within a bunded area which will be sealed with a chemical resistant epoxy coating and all tanks and associated pipework will be located above ground to allow easy access for maintenance.

We agree with the operator's risk assessment and consider that risk to the environment from the changes is not significant and that the operator's operating techniques are sufficiently protective of the environment.

Monitoring

We have included a new emission to air point (A9) in the permit which will vent emissions from the treatment tanks associated with the new zinc anodising process. As noted above, emissions to air from the process are expected to be insignificant and therefore we have not specified any monitoring requirements for this emission point.

We have also removed some of the emissions to air points from Table S2.2.1 as these are not true emission points to air. The points removed are as follows:

- A3 – Zinc plating tank 8A;
- A4 – Zinc plating tank 8B;
- A5 – Zinc acid plating tank 8C; and
- A6 - Zinc acid plating tank 8D.

The purpose of these emission points is to provide general ventilation for the building above the operational areas described. They do not provide direct extraction of process emissions. We have retained references to these ventilation points in the site plan, but have removed the 'A' references, to denote that these points are not linked to emissions to air table S2.2.1.

Finally we have amended the description of emission to air point A1 to a more accurate description of the process.

Annex 1: decision checklist

This document should be read in conjunction with the application and supporting information and notice.

Aspect considered	Justification / Detail
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 to carry on the permitted activities within the site boundary.
Site condition report	The operator has provided a description of the condition of the site. We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports – guidance and templates (H5). See **Key Issues** section.
Biodiversity, Heritage, Landscape and Nature Conservation	The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and protected habitat. A full assessment of the application and its potential to affect the habitat has been carried out as part of the permitting process. We consider that the application will not affect the features of the habitat. We have not formally consulted on the application. The decision was taken in accordance with our guidance.
Environmental Risk Assessment and operating techniques	
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The operator's risk assessment is satisfactory. The assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment all emissions may be categorised as environmentally insignificant.

Aspect considered	Justification / Detail
	See **Key Issues** section.
Operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. The proposed techniques 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. We consider that the emission limits included in the permit reflect the BAT for the installation.
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.
Monitoring	We have amended the emissions to air points referenced in the permit. See **Key Issues** section.
Operator Competence	
Environment management system	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.