

Harlow Council

Environmental Permitting Regulations 2016 Regulated Facility Inspection



Inspection Report - The following information provides a formal record of the following inspection:

Inspection Type:	Check Inspection	Site Reference:	EPR/A2/001
Site Name & Address:	O-I manufacturing UK Edinburgh Way Harlow Essex CM20 2UG	Date Inspected:	18 th November 2019
		Person Seen:	Kevin Bassett
		Inspected By:	Fay Rushby Steven Adams

1. Spot samples

Spot sampling was undertaken on 20th September 2019

- 7-days prior notification of spot testing must be given to the Regulator. Email fay@ehrc.org.uk and Steven.adams@harlow.gov.uk
- Please forward the test report from September 2019.
- When reporting spot samples, comparison must be made on site CEMs at the time of spot sampling.

2. CEMs

CEMs appeared to be operational at the time of the inspection:

- CEMs must be calibrated at least once every six months, and calibration records made available for inspection.
- A summary of CEM data must be forwarded every three months.

3. Plant update

A generally summary of updates follows:

- EP deep clean undertaken August 2019. Insulators replaced.
- Lime injection system still not working. This equipment will likely need re-instating to meet emission limits.
- EP dust recycling discussed. Plant wants to recycle but currently does not. Housekeeping very poor in reclaim area under the EP.
- Batch house offload area delivery system questioned re delivery procedure and silo alarms.
- Spilt material on roof areas must be cleared away to prevent damage/collapse/wind entrained particulates.
- General site housekeeping not very good.
- Still no current plans to decommission the oil store.
- No planned colour change, however recipe may be adjusted soon for salt cake.
- End of year report to be submitted to me and Steven
- Make better use of enablon system (see page 20 of the permit for summary of reporting dates).

4. Permit update

A permit update was proposed last year in order to remove now redundant upgrading conditions, and to fix an original permitting error in relation to emissions reporting. Proposed amended conditions were as follows:

- 3.1.2 Measured emissions for comparison with emission limits in condition 3.1.1 shall be calculated by conversion from concentrations mass emission, and:
 - a) For continuous measurements, a 15-minute average sampling period shall be used.
 - b) All values for concentrations in waste gases refer to standard conditions: dry gas, temperature 273.15 K, pressure 101.3 kPa.
- 3.1.3 For discontinuous measurements, the emission limits provisions of condition 3.1.1 should refer to the average value of three spot samples of at least 30 minutes each. Where a single measurement is undertaken, no result shall exceed the emission concentration limits specified.
- 4.1.3 Where Continuous Emission Monitors are installed to comply with the monitoring requirements; the Continuous Emission Monitors shall be used such that:
 - a) valid 15-minute averages shall be determined within the effective operating time (i.e. excluding the start-up and shut-down or hot hold periods).
 - b) daily average values shall be determined as the average of all the 15-minute average values within a calendar day. The daily average value shall be considered valid if no more than five 15-minute average values in any day have been determined not to be valid;
 - c) no more than ten daily average values per year shall be determined not to be valid.
- 4.1.4 Exhaust gas volumetric flow rate from melting furnaces shall be continuously monitored and continuously recorded.

The council intends to issue the updated permit for 31st December 2019, so please forward any comment you have within the next 14-days.

5. Next Inspection

An inspection date in Q1 2020 is requested, and will cover the following matters:

- a) Spot testing results.
- b) CEM data review.
- c) CEM calibration records.
- d) Use of enablon.
- e) End of year report.
- f) EP dust recycling.
- g) Lime injection.
- h) Recipe change (Sulphur balance calculation required).
- i) Batch house delivery procedures and silo management.

Signed:



Environmental Health Officer

Date of Report: **1st December 2019**