Harlow Council

Environmental Permitting Regulations 2010 Regulated Facility Inspection Report



Site Reference: PPCA/A2_3.3/UG/2003 Date Inspected: 12th January 2016

Inspection Type: Full Inspection Person Seen: Alistair Lowe

Eddie Goddard

Site Name O-I manufacturing UK Inspected By: Fay Rushby

&Address: Edinburgh Way Steven Adams

Harlow Essex CM20 2UG

Inspection report: The following information provides a formal record of the above inspection:

1. Draft permit

The draft permit was discussed, and the proposed conditions reviewed. The proposed permit includes all IED requirements, BAT AELs for emission limits from the melting furnace, and narrative BAT for other technical controls.

The brevity of the proposed permit compared to the current should not be taken to be a relaxation in environmental controls. It may appear less prescriptive; however it should allow both the Operator and the Regulator to ensure that site specific BAT is effectively employed on an ongoing basis.

The permit must be issued by 28th February 2016, and order to allow enough time to completion the accompanying permit decision document, I request your final comments on the draft by 5th February 2016.

2. Spot samples

Emissions testing was undertake in November 2015, with the furnace working at normal operating conditions and with operational abatement plant.

The emissions monitoring results indicate that Particulate and NOx emissions are well within limits, however acid gas emissions exceeded emission limits as follows:

Parameter	Emission Rate	Emission Limit	Comments
Particulate	0.003	0.06	Well within emission limits.
NO _x as NO ₂	0.40	0.8	Well within emission limits.
Sulphur Dioxide	0.93	0.75	Exceeds emission limit.
Carbon Monoxide	<0.01	-	There is no further need to include CO in spot samples.
Hydrogen Fluoride	0.009	0.008	Exceeds emission limit.
Hydrogen Chloride	0.06	0.03	Exceeds emission limit.

The abatement plant was advised as operational at the time of the testing, and with sorbent injection (however the rate of sorbent injection is not known).

Re-testing is required as soon as practicable. It is noted that you are currently in a short green glass campaign (all other stack testing undertaken during amber campaigns).

You must ensure that sorbent injection can deliver compliance with BAT AELs during green or amber glass campaigns. A sulphur balance describing how you will achieve this must be forwarded within 14 days.

The rate of sorbent injection must be determined, and this should also be reported in the stack emissions monitoring report.

4. Site inspection

During the site inspection (which was a site tour to show Steven Andrews the works), the following matters were noted:

VSA

The VSA works are progressing, however technical issues with the local electricity substation mean that a revised 'soft start' procedure is required. The VSA should be fully on line later in the year.

Batch House

A visible dust emission was observed from the top pf the batch house during an iron oxide delivery. This is not acceptable, and you are reminded that bulk deliveries with the potential to cause dusty emissions should not be received if works are being undertaken on a silo. I also remind you regarding the need for effective maintenance and inspection of silo filters and pressure relief devices in the batch house (the checks for which should be fully documented).

Please forward the reason for the emission and the proposals for works to resolve the problem within 7 days.

5. 2016/2017 Workplan

The new permit will be in place for the 2016/2017 inspection year, and I encourage you to formulate a work plan to enable you to demonstrate full compliance with your permit conditions.

This should include, but is not limited to the following matters:

- Batch house delivery and emissions monitoring procedures.
- Storage silo filter and pressure relief device inspection and testing.
- Sulphur balance.
- > Reagent dosing rates.
- > Stack emissions volumetric flow.
- Annual reporting.

> 4 year reviews.

Signed: Date of Report: 14th January 2016

Environmental realinging