

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 Name & Address: O-I manufacturing UK
Edinburgh Way
Harlow
Essex
CM20 2UG

Site Reference: EPR/A2/001

Date Inspected: 19th March 2019

Person Seen: Raj Parmar

Inspected By: Fay Rushby
Steven Adams

1. Spot samples

Emissions testing was undertaken in February 2019 (2018 visit 2). The results were as follows

Parameter	Emission Rate (kg/t)	Emission Limit	Comments
Particulate	0.10	0.06	<i>Exceeds emission limit.</i>
NO _x as NO ₂	0.19	0.8	Within emission limit.
Sulphur Dioxide	0.77	0.75	<i>Exceeds emission limit.</i>
Hydrogen Fluoride	0.005	0.008	Within emission limit.
Hydrogen Chloride	0.05	0.03	<i>Exceeds emission limit.</i>
Group 1 metals	0.964	1.5	Within emission limit.
Total metals	10.04	7.5	<i>Exceeds emission limit.</i>

The emissions monitoring results indicate that there are some emission limits compliance issues for:

- Particulates.
- Sulphur Dioxide.
- Hydrogen Chloride.
- Total Metals.

Noted that a further emissions re-test is planned, however works to the EP are planned and include:

- New ceramic insulators (to permit more/all fields to be operated at the same time). It is also hoped that the new HV system should help to protect the delicate ceramic cones from future damage.
- Full clean to be undertaken at next EP shutdown.

For the purposes of the PRTR, please use an average of all of the Spot sample results obtained in 2018.

2. Emissions limit compliance

The plant must aim to secure compliance with ELVs in 2019/2020 inspection year.

- It is hoped that the EP clean and repair will deliver compliance.
- If not, reagent injection will be required.

3. CEMs

Furnace operators must have regard to the CEM PC during melting operations.

- Any issues with the CEM PC must be rectified without delay.

The CEM PC failed on 11th April 2019 during a software update.

- A progress report is required please.

4. Permit update

A permit update was proposed last year in order to remove redundant upgrading conditions, and to fix an original permitting error in relation to emissions reporting. Proposed amended conditions were as follows, however I don't recall any feedback from the plant:

All proposed permit amended conditions are highlighted in yellow in the draft permit attached to this email. Please forward any comments or objections to the proposed amendments by **7th June 2019**.

Noted also that the company name has changed to O-I Glass Limited. This amendment has also been made (NB: not a permit transfer as the company number has remained the same)

Requirements for action - The following actions must be undertaken within any time specified:

1. Spot testing

The results of the spot-tests have indicated that the emission limits for Sulphur Dioxide, Hydrogen Fluoride and Hydrogen Chloride are not being met. You must:

- a) Notify the Regulator of the data of the proposed re-test by **7th June 2019** (the actual test date to be decided by yourselves).
- b) Re-test using a MCERTS accredited testing organisation. The average of 3 30-minute samples is required by condition 3.1.3.
- c) Calibrate CEMs using the results of the spot sampling.
- d) Include a comparison of CEM data obtained during the testing period.

2. CEMs

Please forward on the CEMs computer by **17th May 2019**.

3. Draft Permit

Please forward any final comments of the draft permit by **7th June 2019**.

4. EP Works

Please forward an outline plan for works to the EP by **7th June 2019**.

Signed:



Environmental Health Officer

Date of Report:

13th May 2019

Risk Assessment

1 - Scoring for Inherent Environmental Impact Potential

Activity category	Score Awarded
Category 1 activity	10

2 - Scoring for Progress with Upgrading

Status of Upgrading	Score Awarded
Upgrades required and deadline passed	10

3 - Scoring for Sensitivity and Proximity of Receptors

Sensitivity and proximity of receptors to the emission source	Score Awarded
Medium sensitivity receptors are within 100-250m	12

4 – Scoring for Other Air Pollution Targets

Contribution of the activity to local AQMA	Score Awarded
The activity is not a potential contributor to, or the cause of a local AQMA	0

5 - Scoring for Compliance Assessment

Scale of Non-Compliance	Possible Score	Score Awarded
(A) Incident leading to justified complaint but no breach of any specific permit condition or of the general/residual BAT condition.	0 points	0
(B) Incident leading to a justified complaint*.	5 points per incident	0
(C) Breach of permit conditions, not leading to formal action. ➤ Particulates emission limit not met. ➤ Sulphur Dioxide emission limit not met. ➤ Hydrogen Chloride emission limit not met. ➤ Total Metals emission limit not met.	10 points per breach	40
(D) Incident leading to formal caution, Enforcement Notice or prosecution.	15 points per incident	0
(E) Incident leading to a Prohibition Notice or Suspension Notice.	20 points per incident	0
	Total (Max. 50):	40

* Unjustified complaints may be e.g. those considered by the inspector to be unreasonable or which cannot be clearly linked to an incident at the process.

6 – Scoring for Assessment of Monitoring, Maintenance and Records

Criterion	Possible Score			Score Awarded
	Yes	No	N/A	
(A) Is all monitoring undertaken to the degree required in the permit?	0	10	0	0
(B) Have monitoring requirements been reduced because results over time show consistent compliance?	-5	0	0	0
(C) Is the process operation modified where any problems indicated by monitoring?	0	5	0	0
(D) Is there a fully documented and adhered to maintenance programme, in line with permit?	0	5	0	0
(E) Are fully documented records as required in the permit available on-site?	0	5	0	0
(F) Are all relevant documents forwarded to the authority by date required?	0	5	0	0
	Total:			0

7 - Scoring for Assessment of Management, Training and Responsibility

Criterion	Possible Score			Score Awarded
	Yes	No	N/A	
(A) Are there documented procedures in place for implementing all aspects of the permit?	0	5	0	0
(B) Are specific responsibilities assigned to individual staff for these procedures?	0	5	0	0
(C) Is the completion of individual responsibilities checked and recorded by the organisation?	0	5	0	0
(D) Are there documented training records for all staff with air pollution control responsibilities?	0	5	0	0
(E) Are trained staff on site throughout periods where potentially air-polluting activities take place?	0	5	0	0
(F) Is an 'appropriate' environmental management system in place and working effectively?	-5	0	0	0
	Total:			0

8 - Determination of Regulatory Effort from Scores

Actual Score	Score Band	Risk Category
72	40 - 80	Medium Risk