



Notice of Variation of Permit

The Environmental Permitting (England and Wales) Regulations 2010 (As Amended) Regulation 20

To: Robert Lickley Refractories Limited, Dormston Trading Estate, Burton Road, Dudley, West Midlands, DY1 2UF

Dudley Metropolitan Borough Council ("the Council") in the exercise of the powers conferred upon it by Regulation 20 of the Environmental Permitting (England and Wales) Regulations 2010¹ (As Amended) ("the 2010 Regulations") hereby gives you notice as follows:

The Council has decided to vary the terms and conditions of the Permit reference PB/121 granted to you under Regulation 13(1) of the 2010 Regulations in respect of the operation of the Installation at:

Robery Lickley Refractories Limited, Dormston Trading Estate, Burton Road, Dudley, West Midlands, DY1 2UF

The variation of the terms and conditions of the Permit and the dates on which they are to take effect are specified in Schedule 1 to this Notice.

A consolidated Permit as varied by this Notice (and by all previous variation notices listed in the "Status Log" to the Permit) is set out in Schedule 2.

A handwritten signature in black ink that reads "T. Glews".

Signed: **Dated:** 9th January 2014
Tim Glews
Environmental Protection Manager
(Authorised to sign on behalf of Dudley Metropolitan Borough Council)

Address for all communications:
Directorate of the Urban Environment, Environmental Protection
4 Ednam Road
Dudley
West Midlands
DY1 1HL

Email: EnviroProtect.DUE@dudley.gov.uk

SCHEDULE 1

This schedule should be read in conjunction with the Notice of Variation ref: PB/121/WK/201349668

The requirements of this variation shall come into effect as detailed below. If no date is indicated below the variation shall take effect immediately.

The introductory note to the Permit shall be amended to read as follows:

INTRODUCTORY NOTE

This Environmental Permit (The Permit) is issued by Dudley Metropolitan Borough Council (the Council) under Regulation 13(1) of the Environmental Permitting (England and Wales) Regulations 2010 (As amended) (the EP Regulations) (S.I. 2010 No.675), to operate an installation prescribed in Part 2 to Schedule 1 of those Regulations, to the extent specified in the conditions of this permit.

The requirements of this Permit shall be effective from the date of service unless otherwise specified within the Permit. Where a Variation Notice has been served the conditions contained within that Variation Notice shall be effective from the date that the Notice is served, unless a specific implementation date is allocated to specific conditions.

For the purpose of this permit the legal operator of the Installation is: Robert Lickley Refractories Limited, Dormston Trading Estate, Burton Road, Dudley, West Midlands, DY1 2UF. Company number: 01309772

The following Process Guidance Note applies to this installation: 3/01(12) Statutory Guidance for blending, packing, loading, unloading and use of cement.

The status log shall be amended to read as follows:

STATUS LOG

The status log sets out the permitting history

Detail	Reference	Date	Comments
Application Duly Made	PB/121	13 th January 2009	
Environmental Permit Issued	PB/121	1 st June 2009	
Variation Notice and Consolidated Permit issued	PB/121/WK/201349668	9 th January 2014	Review of permit due to publication of simplified statutory guidance issued by DEFRA

Process Description

The Process Description shall be amended to read as described below:

This installation falls within the definition of Part 2 Chapter 3, Section 3.1 Part B (b) of Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2010 (as amended).

The company are involved in the manufacture and packaging of dry, high alumina refractory concretes including the production of precast refractory blocks. Cement is delivered to the site in two ways. High alumina cement is delivered in bulk by road tanker and is transferred by compressed air to a 38.47 Tonne capacity silo fitted with a DCE Donaldson filter and is cleared by reverse air jets. Other types of cement are delivered to the site in bags and stored internally. Aggregates are delivered to the site in bulk bags and are stored internally until use. No materials are stored in stockpiles or in the open.

High alumina cement is transferred from the silo by compressed air to header tanks above two blending booths. From here, cement is blended in measured volumes with refractory aggregates and additives to produce a specialised high alumina refractory concrete finished product. The mix is either dispensed into bulk bags or into paper bags. The mixing booth for dispensing into bulk bags is served by a single extraction unit which extracts from several points with filtered air being discharged internally. The mixing booth for dispensing into paper bags is served by two Filtex FX 750 extractor units which collect dust from the bag filling points. The extractors have flow rates of 11.02m³/min and 35.08 m³/min. Extracted air is discharged to the external atmosphere through two stacks which are 5.4m high. This production line is also served by a third extractor with collection hoods above the dispense hoppers with air from this unit being filtered and discharged internally. A third bag filling line is available. The feed hopper to this booth is manually fed with cement from bags. The extract unit serving this area is filtered and discharges internally.

Once blended, the cement mixture is either bagged for retail/wholesale or is transferred via bulk bags to one of three casting areas on the site to be mixed with water and cast into a range of products. There are 3 units mixing the cement mix with water. Emissions from the mixing units in the casting areas are collected in bag filter plants none of which discharge to atmosphere and instead vent internally into the workplace. The castings are either left to air dry or are dried in either the gas oven or one of three oil fired ovens. Typical operating temperatures of the ovens are 350°C with the highest operational temperature being 440°C. The gas fired oven is served by single stack which is 7.2m high and the 3 oil fired ovens are exhausted via a single stack of 7.6m high; the stacks are exhausted to the external atmosphere.

Deleted Conditions

All the sections and conditions shall be deleted from the Permit.

New Conditions

New conditions shall be inserted into the Permit as follows:

1.0 THE PERMITTED INSTALLATION

- 1.1 *The permitted installation shall be comprised of the activities and associated activities specified in Table 1.1*

Table 1.1	
Activity listed in Schedule 1 of EP Regulations or Associated Activity	Description of specified activity
<i>Part 2, Chapter 3, Section 3.1 , Part B (b) - Blending and using cement in bulk including the bagging of cement mixtures and the manufacture of concrete blocks and other cement products.</i>	<i>The loading and bulk storage of cement in silos with associated mixing with aggregates, water and additives to manufacture concrete products.</i>
<i>Directly associated activity: The handling, storage and transport of raw materials.</i>	<i>Handling and storage of raw materials including receipt of refractory aggregates and additives through to sending material via a designated process route.</i>
<i>Directly associated activity: The handling, storage and transport of waste materials.</i>	<i>Collection and storage of waste materials including cement, aggregates and waste products.</i>

- 1.2 *The activities specified in Table 1.1 shall not extend beyond the site, being the area shown hatched in red on the Site Plan PB/121 in Appendix 1 to this permit.*
- 1.3 *If the operator proposes to make a change in operation of the installation, the operator must, at least 28 days before making the change, notify the regulator in writing. The notification must contain a description of the proposed change in operation. It is not necessary to make such a notification if an application to vary this permit has been made and the application contains a description of the proposed change. In this condition "change in operation" means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.*
- 1.4 *The best available techniques shall be used to prevent or, where that is not practicable, reduce emissions to a minimum from the installation in relation to any aspect of the operation of the installation which is not regulated by any other condition of this permit.*

2.0 EMISSIONS AND MONITORING

2.1 No visible particulate matter shall be emitted beyond the installation boundary.

2.2 The emission requirements and methods and frequency of monitoring set out in Table 2.1 below shall be complied with. Sampling shall be representative of normal operating conditions.

Table 2.1 - Emission limits, monitoring and related provisions

Row	Substance	Source	Emission limits/provisions	Type of monitoring	Monitoring frequency
1	Particulate matter	Whole Process	No visible airborne emission to cross the site boundary.	Operator observations	At least daily during operation of the process.
2	Particulate matter	Silo inlets and outlets	No visible emission AND Designed to emit less than 10mg/m ³	Operator observations	At time of delivery
3	Particulate matter	Chimney stacks serving the two mixing booth Filtex FX 750 extractor units.	No visible emission	Operator observations Or Indicative monitoring	At least daily during operation of the process Or Continuous
Only emissions to atmosphere are required to comply with the emission limits within this table.					
<p>Notes:</p> <p>a) All periodic monitoring shall be representative, and shall use standard methods.</p> <p>b) The emission limits do not apply during start-up and shut down. All emissions shall be kept to a minimum during these periods.</p>					

Any monitoring display required for compliance with the permit shall be visible to operating staff at all times. Corrective action shall be taken immediately if any periodic monitoring result exceeds a limit in Table 2.1, or if there is a malfunction or breakdown of any equipment which might increase emissions. Monitoring shall be undertaken or repeated as soon as possible thereafter and a brief record shall be kept of the main actions taken.

- 2.3 *All plant and equipment capable of causing, or preventing, emissions and all monitoring devices shall be calibrated and maintained in accordance with the manufacturers instructions. Records shall be kept of such maintenance in accordance with condition 8.1.*

3.0 SILOS

- 3.1 *Bulk cement shall only be stored within the bulk cement silo.*
- 3.2 *Dust emissions from loading or unloading road tankers shall be minimised by venting to reverse air jet arrestment plant or back venting to a delivery tanker fitted with an on-board, truck- mounted relief valve and filtration system and by connecting transfer lines first to the delivery inlet point and then to the tanker discharge point, and by ensuring delivery is at a rate which does not pressurise the silo.*
- 3.3 *The silo and bulk containers of dusty materials shall not be overfilled and there shall be an overfilling alarm.*
- 3.4 *When loading the silo deliveries must automatically stop where overfilling or over-pressurisation is identified.*
- 3.5 *The silo shall have a reverse jet air filter attached to minimise emissions to atmosphere.*

4.0 AGGREGATES DELIVERY AND STORAGE

- 4.1 *Dusty materials (including dusty wastes) shall only be stored in sealed packaging and containers or in enclosed internal areas and shall be subject to management techniques to minimise dust emissions.*

5.0 LOADING UNLOADING AND TRANSPORT

- 5.1 *No potentially dusty materials (including wastes) or finished products shall arrive on or leave the site other than by use of road tankers/covered vehicles or sealed packaging and containers.*

6.0 ROADWAYS AND TRANSPORTATION

- 6.1 *All areas where there is regular movement of vehicles shall have a consolidated surface capable of being cleaned, and these surfaces shall be kept clean and in good repair.*
- 6.2 *Vehicles shall not track material from the site onto the highway.*

7.0 TECHNIQUES TO CONTROL FUGITIVE EMISSIONS

7.1 *The fabric of process buildings shall maintained dust tight so as to minimise visible dust emissions.*

8.0 RECORDS AND TRAINING

8.1 *Written or computer records of all tests and monitoring shall be kept by the operator for at least 24 months and shall be made available for examination by the Council. Records shall be kept of all operator inspections, including those for visible emissions.*

8.2 *Staff at all levels shall receive the necessary training and instruction to enable them to comply with the conditions of this permit. Records shall be kept of relevant training undertaken.*

Appendices

Appendix 1 has been amended to reflect the extended permitted installation area.

General

All references to the Environmental Permitting (England and Wales) Regulations 2007 shall be replaced with references to the Environmental Permitting (England and Wales) Regulations 2010 (As Amended) ("the EP Regulations")

End of Permit Variations

Attached to this Notice is a separate document titled "Guidance for operators receiving a Variation Notice" which does not form part of the Notice. You are advised to read that document and ensure that you fully understand the requirements of the Notice and your rights of Appeal.