

Case Study 2007/03– Low Impact PPC Permit Application

Grotech Production Limited, Britannia Road, Goole, East Yorkshire

Grotech Production Ltd are a specialist formulator and packer to the agrochemical and general chemical sectors working with a range of multinational 'Blue Chip' companies, as well as smaller organisations that do not have in-house production facilities. Grotech's expertise lies in providing a confidential contract service in the formulation and packing of powders, granules and liquids.

In preparation for the installation of a new facility to produce a specialist liquid fertiliser, Grotech had to apply for a PPC permit for the first time.

Key issues for client

- Confidentiality – the process was owned by an overseas client and commercial confidentiality was very important
- Achieving low impact status
- Process design – at the time of application the process had not been fully designed
- Short timescale to write the application, so that manufacturing would not be held up

Solutions provided to client

TT Environmental Ltd negotiated a compromise with the Environment Agency to provide sufficient information for regulatory purposes, which was not so detailed as to compromise commercial confidentiality. Grotech were pleased because it kept their client happy, and the Environment Agency did not have the hassle of the official "commercial confidentiality" process, which adds an extra layer of complexity to the permitting process.

Without Low Impact status, the project would not have been commercially viable (although if it is successful, it may eventually grow to full permit size). TT Environmental Ltd were able to successfully demonstrate that the process is Low Impact, without the need to breach commercial confidentiality.

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Although the process design of the plant was not completely finalised when the permit application was made, TT Environmental Ltd's chemical engineer has sufficient experience in process design and safety to produce a robust process overview and BAT justification, which covered the potential emissions and hazards from the plant within the design parameters available.

Added benefits to client and regulator

One of the outcomes of the Low Impact justification was to highlight a method of reducing emissions to the environment, and also saving water and finished product. This simply involves using the water washouts for process feedwater in the next batch.

The permitting process has gone very smoothly, which indicates that sufficient, detailed information has been provided to the regulator – this has been a “right first time” application. This benefits the Environment Agency, as it makes it easier for them to keep to their permitting schedule. Grotech benefits from the speed of permit being issued, as it has enabled them to start manufacturing as soon as possible.

The permit has been issued without any improvement conditions, which demonstrates that the design of the plant meets the BAT criteria.

Grotech Production Ltd comments:

“As a small business we have neither the time nor the experience to undertake an application of this sort unaided. TT Environmental provided guidance as to what was needed and persisted in extracting the necessary information from us to ensure that the application was completed and approved as rapidly as practicable. We are very pleased to have had TT Environmental's support.” – Martin Usher, Managing Director.

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