

## Variation notice with introductory note

Environmental Permitting (England & Wales) Regulations 2007

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Ellesmere Port Lead Alkyl

Innospec Ltd  
Innospec Manufacturing Park  
Oil Sites Road  
Ellesmere Port  
Cheshire  
CH65 4HF

Variation notice number  
EPR/BM0508IG/V005

Permit number  
EPR/BM0508IG

# Ellesmere Port Lead Alkyl Permit Number BM0508IG

## Introductory note

### ***This introductory note does not form a part of the permit***

The following notice, which is issued pursuant to regulation 20 and Part 1 of Schedule 5 of the Environmental Permitting (England and Wales) Regulations S.I.2007 No. 3538 (the Regulations), gives notice of the variation of an environmental permit to operate a regulated facility/facilities

The main purpose of the regulated facility is the production of lead alkyls for use as anti-knock fuel additives.

The changes introduced by this variation are the addition of a new directly associated activity to the regulated facility. This new activity is the blending of additional fuel additive products and requires a reconfiguration and re-engineering of the bulk storage tank area. The variation introduces no new listed activities, as the raw materials for the new products are produced elsewhere at other offsite facilities. The proposal is to establish a centralised 'blend to order' facility at the regulated facility for the business to simplify its supply chain. 5 bulk storage tanks have been re-designated for this purpose. The new activity is considered to form part of the installation because it uses the same site facilities and infrastructure as the listed activities, specifically the spill containment infrastructure. There are no significant emissions to the environment arising from the new activity. By removing the 5 bulk storage tanks from the lead alkyls process, emissions to air from the lead alkyl process will be slightly reduced.

Schedule 1 of this notice lists any deleted conditions, Schedule 2 lists any amended conditions and Schedule 3 lists any conditions that have been added.

**Status Log of the permit**

<b>Detail</b>	<b>Date</b>	<b>Response Date</b>
Application BM0508IG	Received 31/03/03	
Request to extend determination	Request dated 30 July 2003	Request accepted 8 August 2003
Response to request for information	Notice dated 26 September 2003	Response dated 24 Oct 2003 & 19 Nov 2003
Response to 2 <sup>nd</sup> request for information	Notice dated 26 September 2003	
Further Information	20 November 2003	Additional information from operator on modifications to boiler house
Further Information	26 November 2003	Additional information from operator on air quality impacts
Permit Determined	28 November 2003	
Variation BX1667 determined	Issued 23 June 2004 Effective 28 June 2004	Administrative corrections to original permit
Variation HP3236SB determined	Issued 12 January 2006	
Variation Application	Received 14 <sup>th</sup> November 2008	
Variation XP3038GU determined	Issued 14 <sup>th</sup> January 2008, Effective 15 <sup>th</sup> January 2008	Simple standard variation for bulk storage and ISO tank filling of DBE
Variation Application	Received 22 <sup>nd</sup> December 2008	
Further Information	Received 24 <sup>th</sup> March 2009	Further details on sodium waste receipt, treatment and disposal
Variation TP3134GR determined	Issued 12 <sup>th</sup> May 2009, Effective 13 <sup>th</sup> May 2009	
Variation Application	Received 21 <sup>st</sup> September 2009	
Variation BM0508IG/V005 determined	10th November 2009	

End of Introductory Note

Notice of variation

**Environmental Permitting  
(England and Wales) Regulations 2007**

Permit number  
**EPR/BM0508IG**

The Environment Agency in exercise of its powers under Regulation 20 of the Environmental Permitting (England and Wales) Regulations 2007 (SI 2000 No 3538) varies the permit as set out below.

Innospec Ltd ("the operator"),  
whose registered office is  
**Innospec Manufacturing Park  
Oil Sites Road  
Ellesmere Port  
Cheshire  
CH65 4EY**

company registration number **344359**

holds a permit to operate a regulated facility at  
**Innospec Manufacturing Park  
Oil Sites Road  
Ellesmere Port  
Cheshire  
CH65 4EY**

and that permit is varied to the extent set out in Schedules 1 to 3 of this notice.

The notice shall take effect from 10<sup>th</sup> November 2009.

Name	Date
	10 <sup>th</sup> November 2009

Anne Nightingale

Authorised on behalf of the Agency

## Schedule 1 – conditions to be deleted

1. None

## Schedule 2 – conditions to be amended

2. The following conditions are amended as follows

2.1 Condition 1.1.1 is amended by the addition of the following row to Table 1.1.1

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Directly Associated Activity	Blending of fuel additive products not produced at the installation	From receipt of raw material onto site to dispatch of product.
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2.2 Condition 1.4.1 is amended by the addition of the following row to Table 1.4.1

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16	The Operator shall carry out a review of the Site Protection and Monitoring Programme taking account of the changes in operation and materials storage arising from this variation. The results of the review shall be reported to the Environment Agency.	Within 3 months of commencement of blending operations.
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2.3 Condition 2.1.1 is amended by the addition of the following row to Table 2.1.1

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Application for variation reference BM0508IG/V005	Appendix C1	21 <sup>st</sup> September 2009
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## Schedule 3 – conditions to be added

3. None

## Environment Agency Permitting Decisions

We have decided to grant the variation for Innospec Limited.

The Permit number is:	EPR/BM0508IG
The Variation notice number is:	EPR/BM0508IG/V005
The Operator is:	Innospec Limited
The facility is located at:	Innospec Manufacturing Park, Oil Sites Road, Ellesmere Port, Cheshire CH65 4EY

The decision is effective from: 10<sup>th</sup> November 2009

### **SUMMARY OF THE DECISION**

We have decided to grant a variation to the Permit, subject to the conditions in the variation notice.

The main purpose of the activities at the regulated facility is the production of lead alkyl fuel additives.

The changes introduced by this variation are the addition of a new directly associated activity to the regulated facility. This new activity is the blending of additional fuel additive products and requires a reconfiguration and re-engineering of the bulk storage tank area. The variation introduces no new listed activities, as the raw materials for the new products are produced elsewhere at other facilities. The proposal is to establish a centralised 'blend to order' facility for the business to simplify its supply chain. The new activity is considered to form part of the installation because it uses the same site facilities as the listed activities, specifically spill containment infrastructure.

The bulk storage area comprises 7 bulk storage tanks BST 1 to 7. BST1 and BST 4 will be retained for their current use. The variation therefore concerns the operation of BST 2, 3, 5, 6 & 7.

The variation introduces the following raw materials to the site:-

- 2-ethylhexanol (2EH)
- 2-ethyl hexyl nitrate (2EHN), also referred to as (CNI)
- Raw Material 1 (RM1) – a fuel detergent additive
- Blend1 – A fuel additive comprising CNI, RM1 and other minor additives.

BST 5, 6 & 7 will be reconfigured to enable either 2EH or CNI. BST2 will be reconfigured for storing either CNI or RM1. BST3 will be reconfigured for carrying out blending. BST 3, 5, 6 & 7 will operate at ambient temperature and pressure. BST2 will operate at ambient pressure but be heated to 55 to 60 deg C when storing RM1.

All the BST tanks are currently connected to a nitrogen padding system, all the vents are connected to a scrubbing system. These are not required for the blending system, thus BST 2, 3, 5, 6 & 7 will be disconnected from the system and the tanks will vent to atmosphere. BST1 & 4 will continue as now.

There are no significant emissions to the environment arising from this variation. By disconnecting the storage tanks from the nitrogen padding and vent scrubbing system, there will be periodic displacement of the vapour in the head space of the storage tanks to air via the vents during tank filling. Also due to fluctuations in ambient temperature. The materials stored in these tanks are generally of low volatility, except that in tank BST2, material RM1 will be stored at 55 to 60 deg C. RM1 contains a diluent solvent with a flash point of < 70°C deg C, the solvent is classified as a class B VOC. The Operator has estimated the fugitive losses from all 5 storage tanks. Total fugitive emissions of 579 Kg per year of class B VOCs have been estimated of which 253 Kg per year arise from BST2. The Environment Agency's technical guidance would only seek to impose an emission limit value in the event that emissions exceeded 5 tonnes / yr or 2 Kg /hr. The Operator does not propose to abate the fugitive releases. The Operator has provided a H1 assessment which shows that these releases are insignificant. By disconnecting the 5 tanks from the vent scrubbing system, the load on the vent scrubbing system is reduced and this will in turn result in lower emissions from emission points A7, A17 and A18.

The variation amends tables 1.1.1 and 2.1.1 to enable the new activity.

The change of use does not result in any new releases to water, nor any significant changes in the quantities of hazardous and non-hazardous waste for disposal. The change of use will not result in any significant change in energy use, odour, noise or vibration. Management controls will be unchanged.

The only other change required as a result of this variation notice is to review the site protection and monitoring programme in light of the change of use the storage tanks and introduction of new materials onto the site. This is included as an improvement condition to be completed within 3 months. The variation therefore also amends table 1.4.1.