



Variation Reference number 02/22

Schedule 2

Operator	Moveero Limited
Installation Address	Telford Wheels Paint Plant Hadley Castle Works Hadley Telford TF1 6AA
Permit Reference	110/020222
Grid Reference	SJ675124
Registered Office	Moveero Ltd Hadley Castle Works Hadley Telford TF1 6AA
Registered Number	00751186

Moveero Ltd ("The Operator") is hereby permitted by Telford & Wrekin Council ("The Regulator") to carry out the following activities and their associated activities:

1. The surface treatment of metals using an electrolytic or chemical process where the aggregated volume of treatment vats is more than 30m³ and where the activity is carried on at the same installation where one or more activities fall within Part A(2) or Part B of section 6.4, as defined under Schedule 1, Part 2, Section 2.3, Part A(2), (a)(iii) of The Environmental Permitting (England and Wales) Regulations 2016 ("The Regulations").
2. The application and curing of coating containing organic solvents to metal, with an annual usage of 5 or more tonnes of organic solvents, as defined under Schedule 1, Part 2, Section 6.4, Part B(a)(iv) of The Regulations.
3. The application and curing of powder coating material to metal with an annual usage of more than 20 tonnes per 12 month period as defined under Schedule 1, Part 2, Section 6.4, Part B(a)(i) of The Regulations.

To the extent authorised by and subject to the conditions of this Permit and within the installation boundary outlined in red within Appendix 2 of this permit.

Signed:

Name: Clair Travis

Environmental Health Consultant

Authorised by the Borough of Telford and Wrekin to sign in that behalf

Date: 2 February 2022



Pollution Prevention Control Act 1999

Environmental Permitting (England and
Wales) Regulations 2016

Contact Details

The contact address, telephone number and email address for all correspondence in terms of the permit is as follows:

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Telford
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CONTENTS

Introductory Note	1
Activities and fees	5
Permit Conditions.....	7
Description of the Installation	7
Permitted activities	18
Operational controls	19
Accidents, incidents and abnormal emissions	19
Emissions - air	20
Emissions - odour.....	21
Emissions beyond the boundary	21
Emissions – effluent discharge.....	21
Emissions – land and groundwater water.....	22
Waste	22
General requirements.....	23
Records.....	24
Solvent management plan.....	24
Solvent reduction scheme	24
Designated materials.....	25
Written environmental management plan	25
Resource audits	26
Noise and vibration.....	27
Emission monitoring	27
Soil and groundwater monitoring.....	28
Site closure plan.....	28
Improvement plan.....	29
Figure 1 electrodeposition painting process.....	8
Figure 2 demineralisation and effluent treatment plant	11
Figure 3 Powder coating and curing (wheel).....	14
Figure 4 chassis powder coating and curing.....	16
Appendix 1 Location of installation and site boundary	30
Appendix 2– Installation boundary and site layout.....	31
Appendix 3– Definitions to be used for the solvent management plan and solvent reduction scheme.	32
Appendix 4- Interpretation of Terms.....	34



Introductory Note

This Introductory provides relevant information related to this Permit

The following permit is granted to Moveero Ltd as required under Regulation 13 of the environmental Permitting (England and Wales) Regulations 2016 (“the Regulations”) to operate an installation to carry out the activities described in this permit.

The permit is issued on the basis that the information provided by the applicant in support of the application for a permit was neither false nor misleading. Any change affecting the accuracy of such information shall be promptly notified, in writing, to Telford and Wrekin Council at the contact address.

The permit includes conditions that have to be complied with. It should be noted that aspects of the operation of the installation which are not regulated by specific conditions are subject to the ‘Best Available Techniques’ condition placed within the permit. Moveero Ltd shall use best available techniques for preventing or, where that is not practicable, reducing emissions from the installation. Please note that techniques include both technology used and the way in which the installation is designed, built, maintained and operated.

Publications

The following Statutory publications are relevant to the installation:

- a) The Environmental Permitting (England and Wales) Regulations 2016 SI 2016 No1154 (as amended).
- b) The Pollution Prevention and Control Act 1999
- c) Council Directive 2010/75.EU of the European Parliament and of the Council on 24 November 2010 on Industrial emissions (integrated pollution prevention and control) known as the Industrial Emissions Directive.
- d) Council Directive 2008/98/EC of the European Parliament and of the Council on 19 November 2008 on waste.
- e) Council Directive 2000/60/EC of the European Parliament and of the council on 23 October 2000 on establishing a framework for community action in the field of water policy (water framework directive).
- f) BREF document Surface treatment of metals and plastics.
- g) Sector Guidance Note SG5 Secretary of State’s guidance for Galvanising. (For the surface treatment aspect of the Note)
- h) Process Guidance Note 6/23 Secretary of State’s guidance for coating of metal and plastics.
- i) Process Guidance Note 6/31 Secretary of State’s guidance for powder coating.



Confidentiality

The permit requires the Operator to provide information to the Regulator. The Regulator will place the information onto the public register in accordance with the Regulations. If the Operator considers that any information provided is commercially confidential, they may apply to the Regulator to have such information withheld from the register as provided in the Regulations. To enable the Regulator to determine whether the information is commercially confidential, the Operator must clearly identify the information in question and must specify clear and precise reasons.

Inspections and risk rating

Under the Regulations, the Regulator is required to undertake appropriate periodic inspections of regulated facilities. Inspections will be undertaken in accordance with the LA-IPPC risk method risk assessment and following on from any complaints or applications.

Procedures and records shall be examined during inspections and will be referred to during the DEFRA annual risk rating of the permitted site. The site will be determined as either a LOW, MEDIUM or HIGH risk. This will determine the annual subsistence fee and the frequency of inspection.

Annual subsistence fee

An annual subsistence fee is payable to operate the permitted installation. An invoice will be issued annually. Failure to pay the subsistence fee may result in a late payment fee and/or revocation of the permit. You are reminded that the operation of an installation without a permit is an offence upon summary conviction to a fine and/or imprisonment.

Responsibility under other statutory requirements.

This permit is given in relation to the requirements of the Environmental Permitting (England and Wales) Regulations 2016 (as amended). It must not be taken to replace any responsibilities you may have under workplace health and safety legislation. Neither does it detract from any statutory requirement such as the need to obtain Planning Permission and/or building Regulations approval.

For the prevention of accidents, the methods employed and the equipment used to ensure the correct handling, storage and use of flammable materials needs to be determined by trained personnel in accordance with HSE guidance and the Dangerous Substances and Explosive Atmosphere Regulations (DSEAR).

Appeals

The Operator can appeal against regulatory action by the regulator to the Secretary of State for Environment, Food & Rural Affairs. Appeals must be made in accordance with Regulation 31 and sent to the Secretary of State for Environment Food and Rural Affairs. The appeal form can be found at:

http://www.planning-inspectorate.gov.uk/pins/environment/environmental_appeals/environmental_permitting_appeal_form.pdf

Guidance on the appeal procedure can be found at:



http://www.planning-inspectorate.gov.uk/pins/environment/environment/environmental_appeals/environmental_permitting_guidance_notes.pdf

There are time limits for making an appeal as follows:

- a) in relation to an appeal against a revocation notice, before the notice takes effect;
- b) in relation to the withdrawal of a duly-made application under paragraph 4(2) of Schedule 5, not later than 15 working days from the date of the notice served under that paragraph;
- c) in relation to a variation notification, a suspension notice, an enforcement notice or a landfill closure notice, not later than 2 months from the date of the notification or notice;
- d) in any other case not later than 6 months from the date of the decision or deemed decision.

Please note:

An appeal brought under Regulation 32(2)(b) and Schedule 6, in relation to the conditions of a permit will not suspend the effect of the conditions appealed against.

The conditions must still be complied with. In determining an appeal against one or more conditions, the Regulations allows the Secretary of State in addition to quash any other conditions not subject to the appeal and direct the local authority either to vary any of these, or other conditions, or add new ones.

Review of Conditions

Under the Regulations the legislation requires permits to be 'reviewed' periodically but does not specify the frequency. It is considered that a frequency of once every eight years shall be adequate. Where significant pollution is encountered or where there are changes to BAT, or where the operational safety of the activity requires other techniques to be used, an immediate review shall be undertaken.

Variation of the permit or part of the permit

If the operator proposes to make a change in the operation of the installation, they must, at least 14 days before making the change, notify the regulator on the appropriate form. The notification must contain a description of the proposed change in operation. A 'change in operation' means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.

The operator may be liable to prosecution if they operate otherwise than in accordance with the conditions and plant described in this permit.

Transfer of the permit or part of the permit

Before the permit can be wholly or partially transferred to another person, an application to transfer the permit has to be made jointly by the existing and proposed operators. A transfer will be allowed unless the regulator considers the proposed operator will not be the person who will have control over the operation of the installation, or will not comply with the conditions of the transferred permit.



Surrender of the permit or part of the permit

Where the operator intends to cease the operation of an installation (in whole or in part). For A2 permits, the Operator must apply for a surrender, using the appropriate form and in accordance with Regulation 25 and part 1 of Schedule 5 of the Regulations.

Offences

Offences under Regulation 38 of the Regulations are:

- (1) It is an offence for a person to—
 - (a) contravene regulation 12(1), or
 - (b) knowingly cause or knowingly permit the contravention of regulation 12(1)(a).
- (2) It is an offence for a person to fail to comply with or to contravene an environmental permit condition.
- (3) It is an offence for a person to fail to comply with the requirements of an enforcement notice or of a prohibition notice, suspension notice, landfill closure notice, mining waste facility closure notice, flood risk activity emergency works notice or flood risk activity remediation notice.
- (4) It is an offence for a person—
 - (a) to fail to comply with a notice under regulation 61(1) requiring the provision of information, without reasonable excuse;
 - (b) to make a statement which the person knows to be false or misleading in a material particular, or recklessly to make a statement which is false or misleading in a material particular, where the statement is made—
 - (i) in purported compliance with a requirement to provide information imposed by or under a provision of these Regulations,
 - (ii) for the purpose of obtaining the grant of an environmental permit to any person, or the variation, transfer in whole or in part, or surrender in whole or in part of an environmental permit, or
 - (iii) for the purpose of obtaining, renewing or amending the registration of an exempt facility;
 - (c) intentionally to make a false entry in a record required to be kept under an environmental permit condition;
 - (d) with intent to deceive—
 - (i) to forge or use a document issued or authorised to be issued or required for any purpose under an environmental permit condition, or
 - (ii) to make or have in the person's possession a document so closely resembling such a document as to be likely to deceive.
- (5) It is an offence for an establishment or undertaking to—
 - (a) fail to comply with paragraph 17(3) or (4) of Schedule 2, or
 - (b) intentionally make a false entry in a record required to be kept under that paragraph.
- (6) If an offence committed by a person under this regulation is due to the act or default of some other person, that other person is also guilty of the offence and liable to be proceeded against and punished accordingly, whether or not proceedings for the offence are taken against the first mentioned person.

Penalties and enforcement undertakings

Penalties under Regulation 39 of the Regulations are:

- (1) Subject to paragraph (2), a person guilty of an offence under regulation 38(1), (2) or (3) is liable—
 - (a) on summary conviction to a fine or imprisonment for a term not exceeding 12 months, or to both;
 - (b) on conviction on indictment to a fine or imprisonment for a term not exceeding 5 years, or to both.
- (2) A person guilty of offence under regulation 38(1), (2) or (3) in respect of a flood risk activity is liable—
 - (a) on summary conviction to a fine or imprisonment for a term not exceeding 12 months, or to both
 - (b) on conviction on indictment to a fine or imprisonment for a term not exceeding 2 years, or both.
- (3) In relation to an offence committed before the commencement of section 154(1) of the Criminal Justice Act 2003(a), paragraphs (1)(a) and (2)(a) have effect as if for “12 months” there were substituted “6 months”.
- (4) A person guilty of an offence under regulation 38(4) is liable—
 - (a) on summary conviction to a fine;
 - (b) on conviction on indictment to a fine or imprisonment for a term not exceeding 2 years, or to both.
- (5) An establishment or undertaking guilty of an offence under regulation 38(5) is liable on summary conviction to a fine not exceeding level 2 on the standard scale.
- (6) Schedule 26 (enforcement undertakings) has effect.

Status Log

Detail	Dates
Date Permit First Issued	03/03/2006
Date of Variations	05/12/2016
Date of Transfer of Permit to GKN Wheels Ltd	17/09/2020
Date of company name change to Moveero Ltd	20/10/2021
Date of Latest Variation	02/02/2022

Activities and fees

This permit is for 3 regulated activities. The conditions for each activity have been consolidated into one document.

The activities are deemed combined activities under The Local Authority Permits For Part A (2) Installations And Small Waste Incineration Plant (Fees And Charges) (England) Scheme 2017, and The Local Authority Permits for Part B Installations and Mobile Plant and Solvent Emission Activities (Fees And Charges) (England) Scheme 2017. Therefore one annual subsistence fee for all activities will be required.



Exclusions from emission monitoring

With regard to stack monitoring of Particulates, Co and NO_x, the requirement to monitor the following stacks is not required as they have installed low NO_x burners to: A1, A2, A3, A4 and A5.

A5 is also exempt from emission monitoring of particulate matter as the method of coating application is dipped and PG 6/23 states that emissions of this type are unlikely to be made.

The operator has demonstrated at the time of this variation, that the airflow is below 50m³/min on Stacks A15, A16 and A17 and monitoring will not be required unless the Operator makes changes to the plant/ equipment or fan that may affect the flow rate.

All exclusions are subject to review should Guidance, Legislation or operations change.

End of Introductory Note

Permit Conditions

Description of the Installation

1. The Operator shall only operate the regulated activities and their associated activities listed in Condition 2, in the installation as described within this condition.

Introduction

The regulated installation is known as Telford Wheels Paint Plant (TWPP) and is located within the site at Hadley, to the north of Telford (Appendix 1: Site Location Plan).

The TWPP is used for the application of corrosion resistant base paint finishes for metal components (typically for automotive / off-highway vehicle applications, including wheel rims) via a process of phosphate conversion coating. Electrophoretic coatings (E-Coat) are commonly used where high corrosion resistance is required, typically on vehicular wheels and sub-frame components such as steering racks, suspension mounts, chassis and chassis fixtures. The installation can process a range of metal components but is predominantly concerned with the coating of wheels manufactured in other parts of the site or within the wider Company Group. A finishing powder coat is then applied to provide the desired coloured topcoat and provide further corrosion resistance.

The location of the installation and the activities within it are shown in Appendix 2: Site Layout Plan.

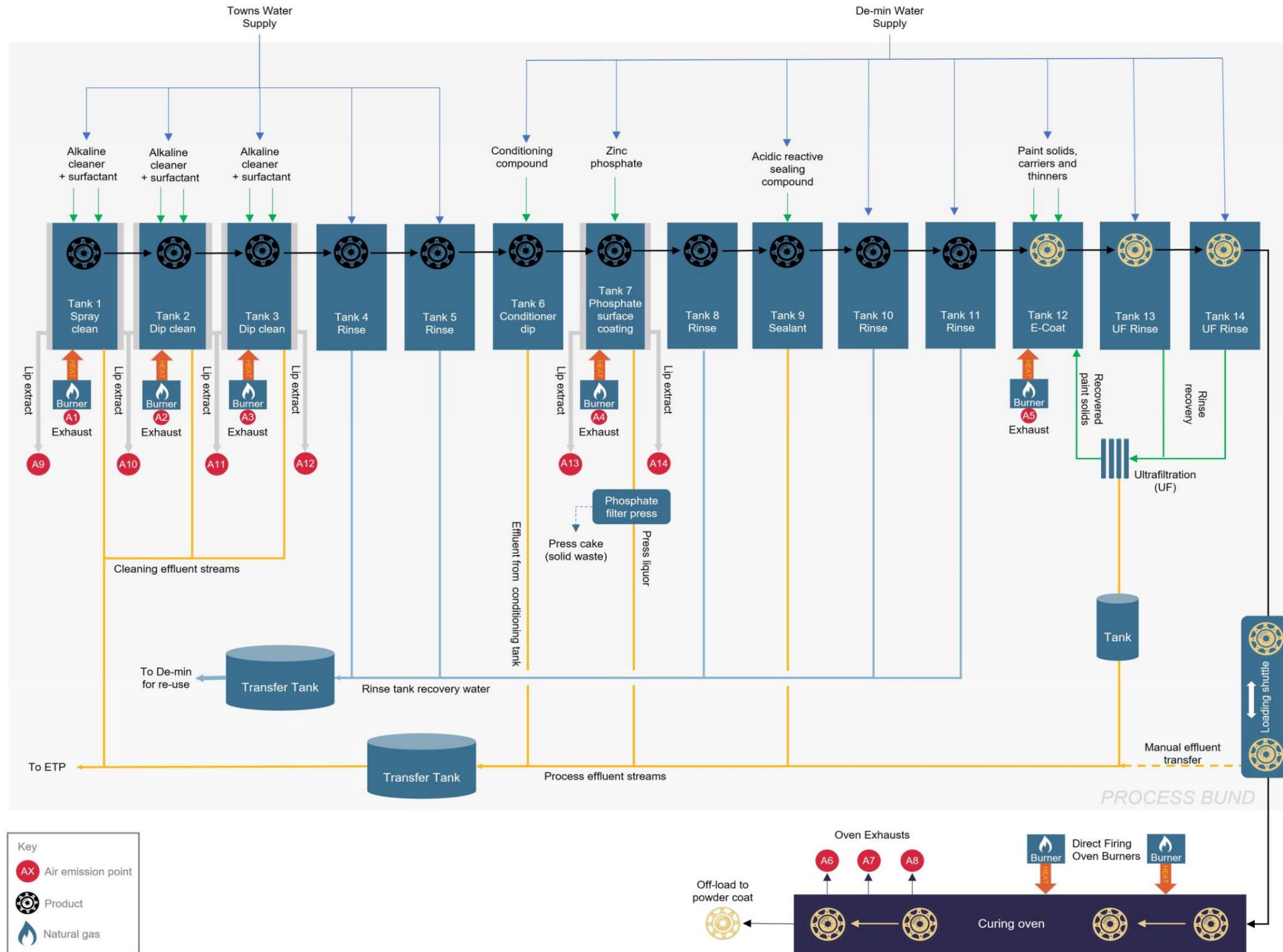
The sequence of the process is as follows:

- Surface preparation and pre-treatment
 - Electrodeposition coating (E-Coat)
 - E-Coat Curing
- } Electrodeposition painting process
- Water and effluent treatment
 - Powder coating and curing
 - Minor refinishing of product

Electrodeposition painting process

The electrodeposition painting process can be split into a series of stages covering surface preparation and treatment, the application of the E-coat; these are presented in the Illustration overleaf and described in the following paragraphs.

Figure 1
Electrodeposition painting process



Key

-  Air emission point
-  Product
-  Natural gas



Surface preparation and pre- treatment

Component parts are transferred from fabrication areas (outside of the installation) to a local storage / holding area before being loaded onto 'jigs' into the pre-treatment stage of the electro-coating process via a conveyor system. The materials are automatically moved from tank to tank in sequence as required, and subject to the requisite control programme for the desired coating. In total 14 spray and dip tanks comprise the TWPP E-Coat line, each of nominal 70,000 litre capacity.

As components enter the process they are first cleaned by a combination of spray and immersion techniques to remove manufacturing residues and oil.

The cleaning solution is heated by a dedicated tank heating element and associated natural gas burner in Tank 1, before being sprayed onto the incoming components. This tank typically operates at c. 20% capacity and cleaning fluid is collected in the base of the tank before recirculation through the spraying units. Tanks 2 and 3 are also heated independently by separate natural gas burners and maintained at temperatures of between 50°C and 65°C. Each tank burner exhausts through a dedicated stack, which represent Emission Points A1, A2 and A3, as shown in figure 3.

Spray liquor for Tank 1 and the immersion cleaning solution in Tanks 2 and 3 are made up of towns (mains) water with the addition of concentrated alkaline cleaning chemicals. Dosing chemicals are stored in intermediate containers of between 25 and 1000 litres within the bunded area and added directly to each tank as required. The contents of Tanks 2 and 3 are constantly agitated by mechanised stirrers, to optimise product cleaning. The recirculation of the contents of Tank 1 performs a similar mixing function to maintain fluid consistency.

The residual oil content in each tank is managed on a feed and bleed basis; regular samples of the tank contents are analysed under contract and reactive dosing with additive chemicals, or topping up with towns water, is undertaken as required. When necessary, waste effluent is pumped to the dedicated TWPP Effluent Treatment Plant (ETP).

Lip extraction removes process fumes (water vapour and residual alkaline fume) from the top of all three cleaning tanks, which is emitted through four adjacent stacks, shown as emission points A9, A10, A11 and A12 on figure 1 above. The stack configuration is shown with adjacent lip extracts combining in common stacks between Tanks 1 and 2, and between Tanks 2 and 3.

A travelling splash hood also guards the jigs as they are removed from each tank and lowered into the next. This hood has three extraction fans which transfer fumes away from the working area and discharge to ambient air within the building.

Rinsing

Components are then introduced to a two-stage rinse in Tanks 4 and 5 to remove any residual cleaning compounds and prevent carry over of concentrated alkali into the later process stages. Tanks 4 and 5 are supplied with towns (mains) water. Levels are managed manually, although the tanks are fitted with level gauges, linked to the plant PLC. Rinse water is recovered for re-use via the internally located



effluent/water treatment plant (ETP). This ongoing feed and bleed to the ETP manages the potential build-up of the alkaline cleaning solutions within the rinse water; the concentration of tank contents is also subject to monthly sampling and laboratory analysis.

Electrodeposition Coating (E-Coat)

The E-Coat application takes place in Tank 12 where electrically grounded parts are coated by passing a low voltage DC current, generated in a nearby rectifier, into the paint solution. The paint emulsion (the electrocoat) is a blend of pigment and resin, plus thinners and carrier solvents made up using demineralised water. The demineralised water is added as required, based on process specific checks and measurements. This tank is heated using a dedicated natural gas fired burner and heat exchange unit, which exhausts through a dedicated stack (emission point A5).

In Tanks 13 and 14 the components are rinsed to remove any unbonded coating prior to transfer to the natural gas-fired curing oven. The rinse water is passed through an ultrafiltration unit which removes paint solids, which are returned to the coating tank (Tank 12) for reuse. The rinse water is re-used in a closed loop system, topped up as required with demineralised water.

As the coated components exit the coating tank, drips are collected on a transfer shuttle which is manually emptied in accordance with the Housekeeping Environmental Management Procedure (Housekeeping EMP), with associated paint residues manually pumped to the ETP.

E-Coat Curing

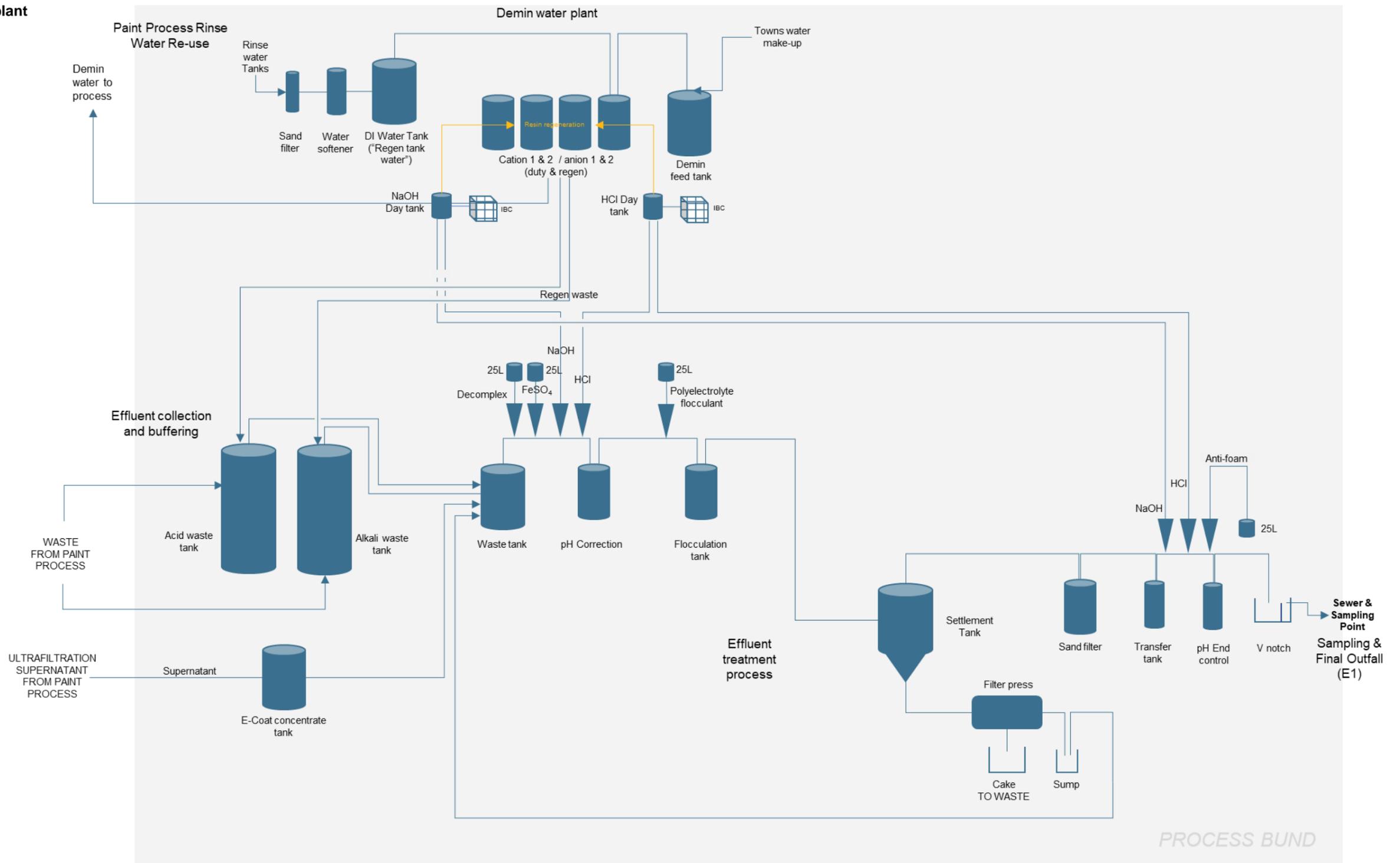
The curing oven operates at a range of temperatures, according to the coating product. Typically, this may be in the range of 120°C to 200°C. The oven is bottom loaded and is capable of holding 11 complete jigs as part of a continuous curing process which takes approximately 45 minutes. The oven is fitted with two direct firing natural gas burners and three separate oven exhaust stacks (emission points A6, A7 and A8).

Cleaning of the carrying jigs takes place periodically to remove paint build up. Hardened paint solids are removed mechanically using a jack hammer within the upload area.

Water demineralisation and Effluent Treatment Plant

Adjacent to the E-Coat process, and essential for its functioning, is a dedicated water and effluent treatment plant. This is located within a separate bunded area. This is illustrated in figure 2.

Figure 2 Demineralisation and effluent treatment plant



Demineralisation (demin) system

TWPP has a dedicated process demin plant, located within the ETP bund. Two tanks store water in advance of the demineralisation process:

- Water from the rinse stages (Tanks 4, 5, 8, 10 and 11) is pumped to the 'DI Water Tank' via a sand filter and water softening unit. This is the preferential water feed source for the demineralisation process.
- A separate 'Demin Feed Tank' holds mains water for make-up, as required (if there is insufficient re-use water available from the process).

The water from the storage tanks is treated in four ion exchange pressure vessels, operating in pairs on a duty/regeneration basis. Each pair of vessels comprises one cation and one anion exchange resin tank. Feed water passes through the cation vessel first, where positively charged ions are chemically exchanged for hydrogen ions. It then continues to the anion vessel where negatively charged ions are chemically exchanged for hydroxide ions. The hydrogen and hydroxide ions combine to create demin water. Whilst one pair is 'on duty' the other is regenerated by passing hydrochloric acid and sodium hydroxide over the respective resins.

The demineralised water produced is utilised in the make-up of the contents of Tanks 6 to 14. Wastewater from the demin regeneration process is pumped to the wastewater tanks within the adjacent ETP.

Effluent / wastewater treatment

Waste process effluent, from the E-Coat pre-treatment stages and the ultrafiltration unit, is pumped to the ETP as required to maintain process critical concentrations. Two large holding tanks (Acid Waste Tank and Alkali Waste Tank) receive this effluent before it is pumped to the Waste Tank from which the treatment stages commence, prior to discharge.

The effluent is dosed with additive compounds during a primary phase of treatment where it passes between a series of tanks including a pH correction vessel and a flocculation tank. Additive compounds include sodium hydroxide (NaOH) and hydrochloric acid (HCl) to adjust pH, and ferrous sulphate (FeSO₄) to promote flocculation, prior to the Settlement Tank. From here the sediment then passes through a filter press from which solid waste is collected as filter cake, and press liquid is recirculated back to the Waste Tank.

Effluent from the top of the Settlement Tank outflows to a secondary phase of treatment through a Sand Filter to a Transfer Tank and then subject to a further stage of pH correction. A final stage dosing of anti-foam is added before the effluent is discharged under consent No. 0008786V to the Severn Trent sewer via a v-notch weir for flow measurement.

Treatment chemicals are stored in intermediate containers of 1000 litres (IBCs) and smaller drums, typically 25 litres (these include flocculent, FeSO₄ and antifoam). These are delivered directly to the bunded area on pallets. The IBCs are stored locally within secondary bunding or on drip trays.



Wheels powder coating and curing

Following the E-Coat application, wheel structures move to the adjacent powder coating area where they are subject to a final coloured coating to meet customer specifications. Powder coating is a dry finishing process that uses finely ground particles of pigment and resin which are electrostatically charged and sprayed onto electrically grounded parts by electrostatic guns. The charged powder particles adhere to the part and are held there until melted and fused into a uniform coating in the curing oven.

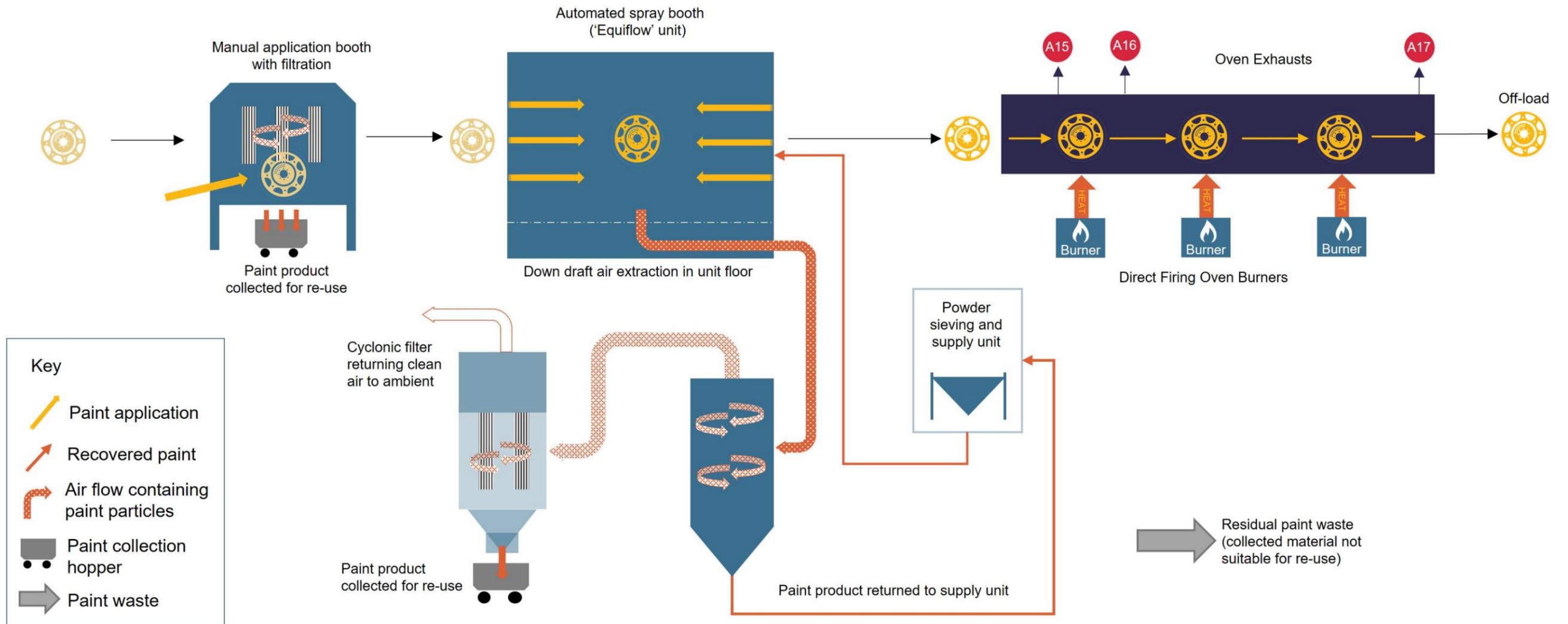
The products, generally wheels and wheel spares, are transferred from the E-Coat jigs to a hanging conveyor belt system by forklift and specialist lifting aids. On entry they are subject to an initial manual spray of hard-to-reach areas which might otherwise not receive sufficient coverage by automated spraying. Excess powder is recovered by the recirculation of air through a filtration system and collected in a powder trolley beneath the unit. All clean collected powder is recycled for use on site.

The manually sprayed wheels then enter the two-stage coating unit (known as the EquiFlow unit), first receiving a pre-inspection and manual touch-up, before passing into the automated spray booth. Both parts of the unit are served by in-floor extraction ducts which again ensure a high level of powder recovery and re-use via a cyclonic air filtration unit. The powder recovery unit removes contaminants and returns recycled powder through a powder sieving unit. All of the powder application areas are passed through filtration systems which vent internally; there are no direct air emissions to atmosphere from the powder coating process.

The wheels then move to the curing oven where temperatures of up to 200°C are applied, over a curing period of 20 minutes. The temperature may vary depending on the paint applied. The oven is fitted with three direct firing natural gas burners and three separate oven exhaust stacks (Emission Points A15, A16 and A17 illustrated on Figure 3).

Wheels are left to cool before they are unloaded from the conveyor and packed for shipping. Finished wheels with minor imperfections are reworked in-house. Those with more substantial flaws in paint finish are sent to a third party operation, outside of the installation, for paint stripping so that they can be recoated, reducing overall product waste.

Figure 3 Powder coating and curing (wheel)



Chassis powder coating and curing

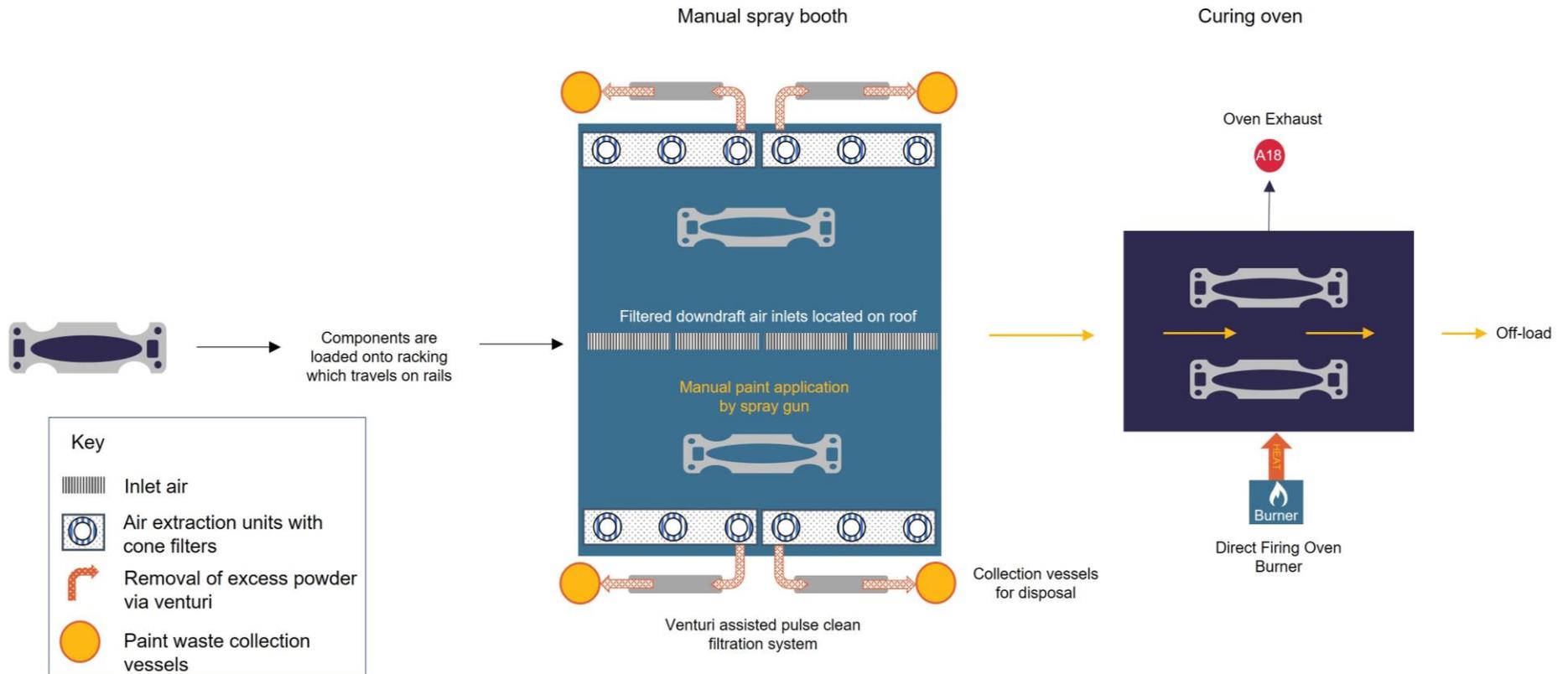
Larger components (chassis and castings) move from the E-Coat off-load point to a separate powder coating area where they are subject to a final coloured coating to meet customer specifications. It is a dry process in which finely ground particles of pigment and resin which are electrostatically charged are manually sprayed onto electrically grounded parts by electrostatic guns. The charged powder particles adhere to the part and are held there until melted and fused into a uniform coating in the curing oven.

The components are loaded onto a racking system which transports them on rails into the spray booth. The booth and rail system are aligned to allow access straight through, via bi-folding doors on either end, to the curing oven. Once the booth doors are closed, the air extraction system is initiated and up to two operators manually apply the powder coating using electrostatic guns. The air flow within the booth is managed via roof mounted inlet filters and a series of cone filters connected to a self-cleaning pulse-jet system. Air is extracted from the booth through the cone filters and routed via a venturi which enables excess powder to be extracted to waste collection vessels, before being vented internally; there are no direct air emissions to atmosphere from the powder application process.

Once sprayed the components move to the curing oven where temperatures of up to 200°C are applied. The curing period may vary depending on the paint applied. The oven is fitted with a single direct firing natural gas burner which emits through a single stack (Emission Point A18) as illustrated on figure 4).

Components are left to cool before they are unloaded and packed for shipping. Any finished components which fail quality control are sent for paint stripping outside of the installation, so that they can be recoated, reducing overall product waste.

Figure 4 Chassis powder coating and curing



Refinishing of product

All products are subject to quality assurance checks following each stage of the processes outlined above. The small proportion of components which are found to have minor defects in base coat or top coat are segregated and retouched on site. Depending on the nature of the defects, works may include manual grinding, welding, polishing and application of primer. All activities take place within a booth which has local air extraction and filtration (exhausted internally). The wheels are then refinished as required. All wastes generated by refinishing activities (filtration residues, grinding materials, discs and empty containers) are collected for appropriate disposal.

Material storage

Raw materials are stored in designated areas throughout the installation as follows:

Table 1 – materials used and stored	
Chemical Type / Purpose	Storage Arrangements
Pre-treatment & Cleaning	
Alkaline cleaning solution	Delivered to Raw Materials Store 1 in appendix 2. Intermediary storage within bunded area adjacent tanks at point of use.
Alkaline surfactant	
Conditioning fluid	
Phosphate conversion coating	
Passivate Non Chrome	
Sealant	
E-Coat Paint	
Paint resins	Delivered to Raw Materials Store 1 in appendix 2. Intermediary storage within bunded area adjacent tanks at point of use.
Paint pigments	
Thinner / solvent (methoxy propanol)	
Thinner / solvent (ethylene glycol monoethyl ether)	
Thinner / solvent (Butyl glycol)	
Refinishing	
Primer	Stored in local COSHH cabinet in intermediate containers (<25litres)
Iso-Propyl alcohol	
Welding shield gases	Bottles stored locally
Powder Coating	
Paint powder	Within designated area Raw Materials Store 2 in appendix 2, adjacent powder coating plant.
Water Treatment	
Water softener (salt)	On pallet within ETP bund
Flocculant	Drums, typically 25litre containers, stored in Raw Materials Store 1 in appendix 2 and moved to the process bund when in use.
Decomplex	
Antifoam	
Sodium hydroxide	Delivered to Raw Materials Store 1 in appendix 2 Stored within ETP bund on individual drip trays immediately prior to use.
Hydrochloric acid	

Permitted activities

2. The Operator shall only carry out the permitted activities and their directly associated activities described in Table 2.

Table 2 – Permitted activities and directly associated activities	
Activities listed in Environmental Permitting (England and Wales) Regulations 2016	Description of specified activity
Section 2.3 Part A(2)(a)(iii)	Surface treating metals and plastic materials using an electrolytic or chemical process where the aggregated volume of the treatment vats is more than 30m ³ and where the activity is carried on at the same installation as one or more activities falling within: (iii) Part A(2) or Part B of Section 6.4.
Section 6.4 Part B(iv)	Unless falling within Part A(1) or Part A(2) of this Section or Part A(2)I of Section 2.1, any process (other than for the re-painting or re-spraying of, or of parts of, aircraft or road or railway vehicles) for applying to a substrate, or drying or curing after such application, printing ink or paint or any other coating material as, or in the course of, a manufacturing activity, where the process may result in the release into the air of particulate matter or of any volatile organic compound and is likely to involve the use in any 12-month period of: (iv) 5 or more tonnes of organic solvents in respect of any activity not mentioned in subparagraph (iii).
Section 6.4 Part B(i)	Unless falling within Part A(1) or Part A(2) of this Section or Part A(2)I of Section 2.1, any process (other than for the re-painting or re-spraying of, or of parts of, aircraft or road or railway vehicles) for applying to a substrate, or drying or curing after such application, printing ink or paint or any other coating material as, or in the course of, a manufacturing activity, where the process may result in the release into the air of particulate matter or of any volatile organic compound and is likely to involve the use in any 12-month period: (i) 20 or more tonnes of printing ink, paint or other coating material which is applied in solid form,

Table 2 contd: Permitted activities sand directly associated activities	
Directly associated activities	
The delivery, storage and handling of materials, including waste.	From receipt of raw materials, the storage and handling of raw materials, through to the handling, storage and disposal of waste materials.
E-Coat curing ovens	From the transfer of the coated metals to the process of curing the coated metals within the natural gas-fired oven and the removal from the curing oven.
Powder coating curing ovens	From the transfer of the coated metals to the process of curing the coated metals within the natural gas-fired oven. To the removal from the curing oven.
Water and effluent treatment	The storage, handling and processing of water and effluent, including associated chemicals and the storage, handling and removal of waste.
Discharge of effluent	Trade effluent from the liquid output from ETP and discharged to sewer under consent number 0008786v

Operational controls

3. The operator shall ensure that deliveries are carried out in such a way so as to minimise noise, spillage, leaks and dusty emissions, in particular, those arising from accidents during materials transfer.
4. Materials listed in table 1 shall be stored in accordance with the EMP Materials Delivery, Storage and Handling procedure.
5. A high standard of housekeeping shall be maintained.
6. The operator shall ensure that tank operations are carried out using a high degree of control to minimise spillage.

Accidents, incidents and abnormal emissions

7. There shall be written procedures, known as an incident and accident management plan. The plan shall identify hazards and assess the risks associated with the activities.
8. The incident and accident management plan shall include procedures for investigating accidents and incidents, including identification and implementation of suitable corrective action and any follow up.
9. The incident management plan shall be made available for inspection by the regulator and reviewed by the operator at least every 4 years.
10. In the case of abnormal emissions from any accident or incident, the operator as a minimum shall:



- a. Investigate immediately and undertake remedial action as soon as practicable;
- b. Promptly record the events and actions taken;
- c. Inform the regulator without delay.

11. Where any incident, accident or non-compliance of any conditions within this permit may lead to immediate danger to human health, operation of the activity shall be suspended.

Emissions – air

12. The operator shall carry out the monitoring requirements specified in Table 3.

13. The operator shall not exceed the emission limits specified in Table 3.

Table 3 – Emission limits					
Substance	Emission Limit	Source	Type of monitoring	Frequency, method and evaluation	Reference conditions
Particulate matter	50mg/m ³	From stacks A6, A7 and A8	extractive testing	Annual using Standard EN13284-1 and MID or using a method agreed with the Regulator	273.1K, 101.3kPa, without correction for water vapour content
Particulate matter	10mg/m ³	A18	extractive testing	Annual using Standard EN13284-1 and MID	
Particulate matter	10mg/m ³ where the flow rate exceeds 50m ³ /min	A15, A16 and A17	extractive testing	Using Standard EN13284-1 and MID Frequency: After any changes are made to relevant plant/equipment or extraction fan that may affect flow rate. And/or at the request of the Regulator.	



14. The introduction of dilution air to stack emissions to achieve concentration limits is not permitted.
15. Emissions from all stacks, other than steam or condensed water vapour, shall be free from persistent visible emissions.
16. The operator shall investigate the cause and nature of any persistent visible emissions and provide a report to the regulator without delay, including remedial action taken.

Emissions - odour

17. All emissions from the installation shall be free from offensive odour beyond the installation boundary identified in Appendix 1, as perceived by the Regulator.

Emissions beyond the boundary

18. In the event of abnormal or adverse visible, odorous or audible emissions at or beyond the boundary, the Operator shall:
 - a. Investigate immediately and undertake remedial action as soon as practicable;
 - b. Promptly record the events, investigation and corrective actions taken;
 - c. Notify the Regulator as soon as practicable, and no later than the next working day following the event.
19. Where abnormal or adverse emissions as described in condition 18 have been found in opinion of the Regulator, the Regulator may request that monitoring is carried out to demonstrate that the remedial action has resolved the incident. The type of monitoring and the timescale to submit the results shall be determined by the Regulator.

Emissions – effluent discharge

20. Discharge of process effluent to surface water shall not be permitted.
21. Effluent from the installation shall be treated within the Effluent Treatment Plant specified in condition 1.
22. Discharge from the Effluent Treatment Plant shall be in accordance with the conditions set within Severn Trent Water Consent to Discharge number 008786V. Failure to comply with the conditions of the Consent to Discharge shall be reported immediately to the appropriate department at Severn Trent Water, and to The Regulator.
23. The effluent treatment plant shall be maintained in accordance with EMP Planned Preventative Maintenance.



Emissions – land and groundwater water

24. All bunding within the installation shall be inspected and maintained in accordance with EMP Bund Inspection and Emptying. All defects shall be repaired within a reasonable time, as agreed with the Regulator.
25. There shall be no emissions of hazardous substances or non-hazardous pollutants to groundwater as described in The Groundwater (England and Wales) Regulations 2009 (and subsequent regulations).
26. The external flooring of the installation shall have an impervious surface and this shall be maintained to prevent emissions to the land and/or groundwater. Inspection and maintenance shall be carried out in accordance with EMP Housekeeping and EMP Planned Preventative Maintenance. All defects shall be repaired within a reasonable time, as agreed with the Regulator.
27. All chemical containers, including connection points, shall be stored within an impervious secondary containment with a volume of 110% of the material stored within it. Incompatible materials shall be kept separate.
28. Waste and waste containers shall be stored on an impervious surface. They shall be stored in a manner that prevents the release of pollutants and incompatible wastes are kept separate.
29. The Operator shall develop and maintain an up-to-date, clear diagrammatic record of the routing of all installation surface drainage system, subsurface structures, interceptors, pipework, effluent transport system and sumps, including the type and location of receiving environment. The record shall be submitted to the Council no later than 6 months from the date of issue of the permit.
30. The operator shall carry out a risk assessment of the surface and subsurface drainage system and devise an inspection, full drainage survey (every five years) and maintenance programme. This must be agreed by the regulator and all records to demonstrate compliance with this condition shall be made available for inspection.

Waste

31. Waste shall only be handled, removed and stored in the areas identified outlined, in accordance with EMP Materials Delivery, Storage and Handling and EMP Waste Management.
32. The operator shall monitor and record the waste produced by the activities on site. This shall include:
 - a. the quantity, nature and origin of the waste.
 - b. The physical description and composition of the waste,
 - c. If applicable, any hazardous properties of the waste including hazard and risk phrases.
 - d. The European Waste Code (EWC)
 - e. Handling precautions and substances with which it cannot be mixed.
 - f. Disposal routes and waste categories.



- 33.** All necessary measures shall be taken to ensure that;
- a. The waste hierarchy referred to in Article 4 of Directive 2008/98/EC on waste (the “Waste Framework Directive”) is applied to the waste generated by the permitted installation; and
 - b. Any waste generated by the permitted installation is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - c. Where further treatment or disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

General requirements

- 34.** The best available techniques shall be used to prevent, or where that is not practicable, reduce the emissions from the installation in relation to any aspect of the activity which is not specifically regulated by any condition of this permit.
- 35.** An appropriate person (and deputy) shall be appointed as the primary point of contact with the regulator. The regulator shall be informed in writing of the appointed person (and deputy). In the event of a different person being appointed, the regulator shall be informed without delay.
- 36.** A copy of this permit shall be kept at the installation. All relevant staff shall be made aware of its content and shall be told where it is kept.
- 37.** If the operator proposes to make a change in the operation of the installation, they must, at least 14 days before making the change, notify the regulator on the appropriate form. The notification must contain a description of the proposed change in operation. A ‘change in operation’ means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.
- 38.** The Operator shall notify the Regulator in writing and within 14 days of their occurrence if they make:
- a. Any change to the installation name, registered company name or company registered address.
 - b. A change to any particulars of the holding company (including details of any ultimate holding company where the Operator has become a subsidiary).
- 39.** The Operator must respond to any Request for Information Notice served for the purposes of complying with their obligation to report their pollutant releases and off-site waste transfers pursuant to the directly applicable EU duty in accordance with Article 5 of EC Regulation No 166/2006 concerning the establishment of a European Pollutant Release and Transfer Register (E-PRTR). Failure to respond in accordance with such annual E-PRTR request for information notice will hereby constitute a breach of this permit condition.



Records

40. All records required to demonstrate compliance with any conditions of this Permit shall be kept in an organised manner. The records shall be kept electronically or in paper form. Records:
- Must be legible and any amendment entered into a record shall be made in such a way as to leave the original clear and legible. A valid reason for such an amendment shall be included.
 - Records shall be kept for a period of 5 years, unless otherwise stated.
 - Records shall be kept on-site for a minimum of 12 months and made available for inspection by the Regulator. Records kept off-site, must be made available within 7 days of any request by the Regulator.
41. All documentation required to be submitted to the regulator to demonstrate compliance with relevant conditions, shall be submitted in an electronic format and include the permit number and the Operator name. Submissions shall be sent to: environmentalprotectionteam@telford.gov.uk

Solvent management plan

42. The definitions in Appendix 3 shall be utilised in demonstrating compliance with the conditions of this section and the solvent reduction scheme section of the permit.
43. The operator shall make available upon request, detailed stock, usage and waste records demonstrating the amount of solvent purchased, used and removed within the installation during each reporting year.
44. The operator shall submit to the regulator no later than 31 January of each year, a solvent management plan that demonstrates the requirements of Conditions 45 and 46 for the reporting year.
45. The operator shall demonstrate the solvent consumption for the reporting year using the following equation:
- The total solvent input (I_1). This shall be calculated using the equation:
 $I_1 = IS + PS - FS$. (in Kg)
 - The solvent consumption (C) $I_1 - O_8 = C$ (in Kg)
46. Solvent cleaning operations, cleaning techniques and cleaning substances shall be reviewed every two years to identify:
- Steps which could be eliminated or automated.
 - Substances which can be substituted.
 - The technical and economic feasibility of changing to different non-VOC cleaning solutions.

Solvent reduction scheme

47. The operator shall comply with the reduction scheme by demonstrating annual actual emissions are less than or equal to the annual target emission.
48. The operator shall use the agreed solvent calculator as a method of demonstrating compliance with conditions 47, 50 and 51.



49. The solvent calculator shall be submitted no later than 31 January of each reporting year.
50. The annual actual emission shall be calculated by using the following calculation:
- a. $I_1 - O_6 - O_7 - O_8 = \text{Actual emission (in Kg)}$
51. The annual target emission shall be calculated by using the following relevant calculation:
- a. If the solvent annual consumption is above 15 tonnes:
 - i. The annual total mass of solids x 0.37.
 - b. If the solvent annual consumption is below 15 tonnes:
 - i. The annual total mass of solids x 0.60.

Designated materials

52. The operator shall maintain a solvent inventory which lists the hazard statements associated with each product containing solvent. This shall be made available upon request.
53. Any products containing any of hazard statements H340, H350, H350i, H360F, H341 and H351 shall not be used.

Written environmental management plan

54. The installation shall be managed and operated in accordance with an approved written environmental management plan.
55. The environmental management plan required in condition 54 shall include:
- a. Environmental policy
 - b. All site and operational procedures for the activities and directly associated activities. This shall incorporate current Best Available Techniques
 - c. Defined responsibilities and site infrastructure plan
 - d. Environmental audits.
 - e. Record keeping.
 - f. Pollution and emission monitoring.
 - g. Preventative maintenance procedures.
 - h. Training, staff competence management and training records.
 - i. Pollution control and accident/incident/ non-conformance management.
 - j. Contingency plans.
 - k. Environmental impact and resource control.
 - l. Energy and resource audits.
 - m. Waste minimisation.
 - n. Complaint procedures.



- 56.** The environmental management plan procedures shall include systems and procedures setting out the necessary steps to be taken;
- a. To ensure that all staff engaged in carrying out operations at the permitted installation, are provided with adequate professional and technical development and training, and written operating instructions to enable them to carry on their duties. This shall include the maintenance of a record of the skills and training requirement for each job, and of all relevant training undertaken by staff.
 - b. To monitor the condition of, and to maintain the permitted installations, included as a minimum; plant, equipment, instrumentation, building, drains, and undergrounds structures which it relies on for the prevention, or limitation, of pollution from the permitted installation.
 - c. To carry out effective maintenance and servicing on all aspects of the installation whose failure has the potential to impact on the environment.
 - d. To investigate and rectify any non-compliance with the conditions of this permit, and/or any incident or pollution identified by the Operator or drawn to the attention of the Regulator, or by complaint by another person.
 - e. In the event of an incident, leak, malfunction, momentary stoppage or other defect of the installation.
- 57.** The environmental management plan required by condition 54 shall be reviewed and updated:
- a. Prior to the completion of a significant change within the installation.
 - b. Where any type of change is made to any plant and equipment listed within conditions 1 and 2 concerned with the control of pollution.
 - c. At least every 4 years in any other circumstance.
- 58.** Any review required by condition 57 shall be recorded, the results incorporated into the environmental management plan and implemented within 3 months from the end of the review.

Resource audits

- 59.** At least every 4 years, a systematic assessment of the following shall be undertaken:
- a. Raw materials
 - b. Electrical and gas consumption
 - c. Emissions
 - d. Waste
 - e. Water usage

The purpose of the assessment shall be to identify methods of optimising or reducing raw materials, energy, fuel consumption, emissions, waste and water usage. The assessment shall include the identification of methods avoiding or reducing the impact on the environment and those methods to be adopted, including timescales. Each assessment shall be recorded and submitted to the Regulator. The next assessment shall be submitted no later than 1 May 2024.



60. The operator shall produce and submit a report by 1 May of each year, on the energy consumption of the installation. This shall include:
- a. Monitoring energy consumption, flows and target areas for reduction.

Noise and vibration

61. The regulated activity shall be free from noise and vibration that are likely to cause nuisance as perceived by the Regulator.
62. Where it has been found by the Regulator that activities are causing noise and vibration beyond the installation boundary as perceived by the Regulator, the Operator shall:
- a. Submit for approval a noise and vibration management plan which includes an appropriate noise or vibration assessment based on current Standards, within a timeframe specified by the Regulator.
 - b. Implement the approved noise and vibration management plan within a timeframe specified by the regulator.
63. Where a substantial change to the installation is proposed, a noise and vibration assessment shall be undertaken and submitted to the Regulator. The purpose of the assessment shall be to identify the potential noise and vibration impact and detail methods of reducing the identified noise and vibration emissions where required. This shall be submitted with the appropriate variation application.

Emission monitoring

64. Monitoring to determine compliance with emission limit values in Table 3 shall be corrected to the following standard reference conditions: temperature, 273.15 K pressures 101.3 kPa without correction for water vapour.
65. The operator shall ensure that relevant stacks or ducts are fitted with facilities for sampling which allow compliance with the sampling standards.
66. The operator shall notify the regulator at least 7 days before any periodic monitoring exercise to determine compliance with emission limit values. The operator shall state the provisional time and date of monitoring, pollutants to be tested and the methods to be used.
67. MCERTS (Monitoring Certification Scheme, Environment Agency) standards shall be applicable to all annual extractive monitoring requirements. Monitoring shall be undertaken by suitably qualified and competent consultants.
68. The results of non-continuous emission testing shall be forwarded to the regulator within 8 weeks of the completion of the sampling.
69. All results submitted to the regulator shall include details of process conditions at the time of monitoring, monitoring uncertainty, any deviations



from the procedural requirements of standard reference methods and the error invoked from such deviations.

- 70.** Results exceeding the emission limits from any monitoring or sampling activity (both continuous and non-continuous), the operator;
- shall investigate and take corrective action as soon as practicably possible,
 - record as much detail of the cause and the action taken,
 - notify the Regulator within 1 week from receiving the results,
 - undertake as soon as practicable, re-testing of the monitoring to demonstrate compliance of the emission limit exceeded.
- 71.** The burners fitted to stacks A1, A2, A3, A4, and A5 shall be serviced at least annually. All records of the service shall be kept on file and made available for inspection.
- 72.** Any faults or breakdowns of the burners, the operator shall follow the requirements of abnormal emissions detailed in condition 10.

Soil and groundwater monitoring

- 73.** From the date of issue of the Permit, periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.
- 74.** Any periodic testing method shall be submitted to the regulator for approval at least 28 days before the proposed monitoring is carried out.
- 75.** The results of the monitoring shall be included within the site closure plan within 8 weeks from receiving the results, and shall be made available for inspection by the regulator.

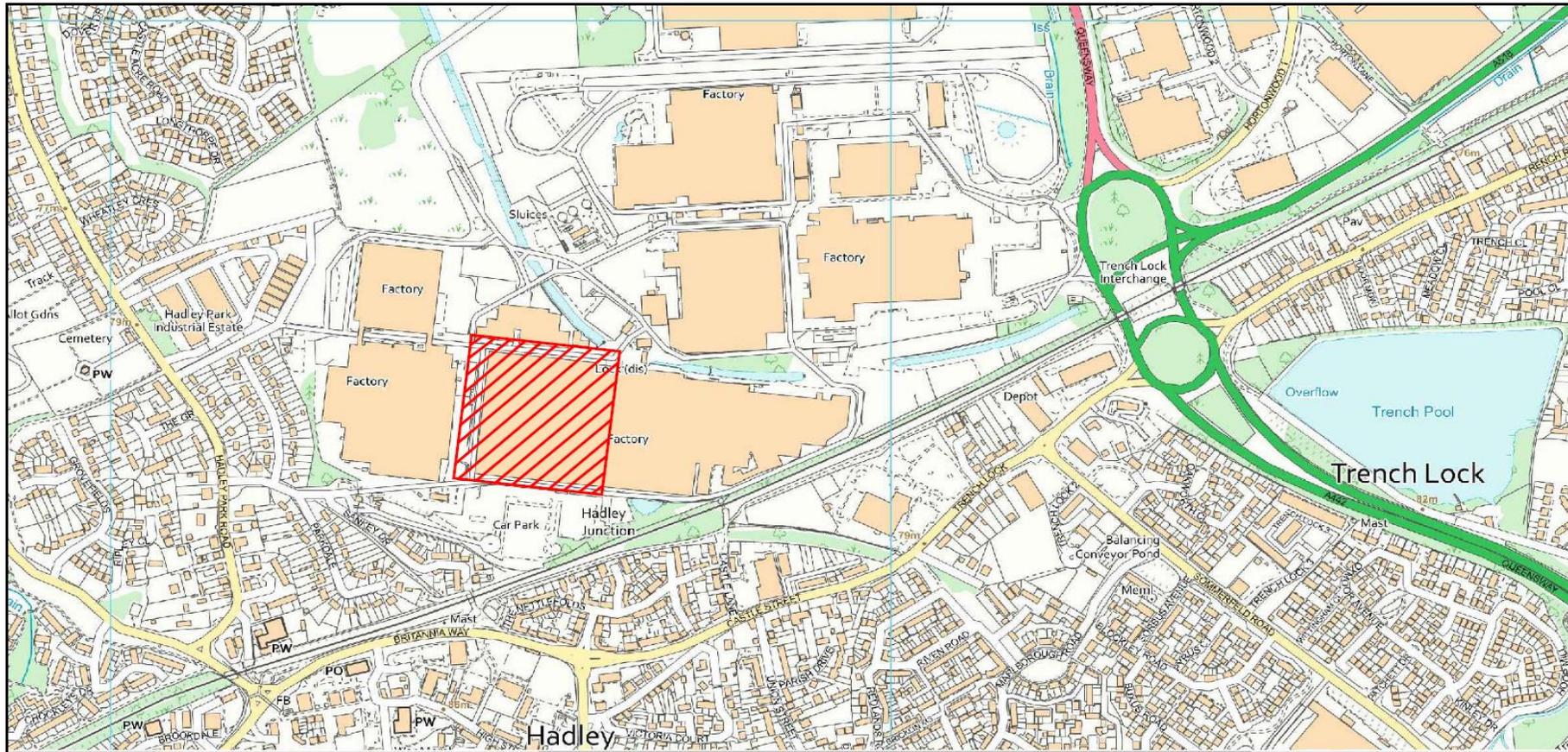
Site closure plan

- 76.** The operator shall maintain a site closure plan for the final cessation of the permitted installation and its activities. The site closure plan shall include:
- Site details; and
 - Full list of raw materials; and
 - Details of the condition of the land at permit issue and during the lifetime of the permit; and
 - The latest survey of the drainage system; and
 - Details of permitted activities; and
 - Outline proposals for decommissioning.
- 77.** The site closure plan shall be kept up to date as changes occur to the installation and its activities. Once updated, the regulator shall be provided with an amended copy within 8 weeks of the completed changes.
- 78.** A review of the site closure plan shall be carried out every 4 years and an updated plan shall be submitted to the regulator.

Improvement plan

- 79.** The operator shall undertake a testing programme for all tank level gauges and assess the suitability of systems in place for use as a process control. Where systems are not suitable, a timetable for improvement shall be agreed with the regulator. Once completed, this shall be included in the environmental management plan. This condition shall be complied with no later than 12 months from the date of issue of the permit.
- 80.** The operator shall produce an accident and incident management plan that identifies the hazards, assesses the risks and identifies the measures required to reduce the risk of potential events or failures that might lead to an environmental impact. This condition shall be complied with no later than 6 months from the date of issue of this permit.
- 81.** Training procedures and a programme for training site operatives shall be developed and submitted for approval to the regulator no later than 6 months from the date of issue of the permit. The approved procedures and programme will then be placed within the environmental management plan.
- 82.** The site closure plan required by condition 76 shall be submitted for approval no later than 12 months from the date of issue of the permit.
- 83.** The environmental management plan as required by conditions 54, 55, 56 and the conditions within the improvement plan, shall be completed no later than 6 months from the date of issue of the permit.
- 84.** The operator shall fit to Stack A6, A7 and A8 testing portals and safe access to them, to allow for the emission monitoring to be carried out as required by the permit. This shall be completed along with the emission monitoring no later than 9 months from the date of issue of the permit.

Appendix 1 Location of installation and site boundary



Appendix 2– Installation boundary and site layout



Appendix 3– Definitions to be used for the solvent management plan and solvent reduction scheme.

I1 The quantity of organic solvents or their quantity in mixtures purchased which are used as input into the process/activity (including organic solvents used in the cleaning of equipment, but not those used for the cleaning of the products).

I2 The quantity of organic solvents or their quantity in mixtures recovered and reused as solvent input into the process/activity. (The recycled solvent is counted every time it is used to carry out the activity.)

O1 Emissions in waste gases.

O2 Organic solvents lost in water, if appropriate taking into account waste water treatment when calculating O5.

O3 The quantity of organic solvents which remains as contamination or residue in products output from the process/activity.

O4 Uncaptured emissions of organic solvents to air. This includes the general ventilation of rooms, where air is released to the outside environment via windows, doors, vents and similar openings.

O5 Organic solvents and/or organic compounds lost due to chemical or physical reactions (including for example those which are destroyed, e.g. by thermal oxidation or other waste gas or waste water treatments, or captured, e.g. by adsorption, as long as they are not counted under O6, O7 or O8).

O6 Organic solvents contained in collected waste.

O7 Organic solvents, or organic solvents contained in mixtures, which are sold or are intended to be sold as a commercially valuable product.

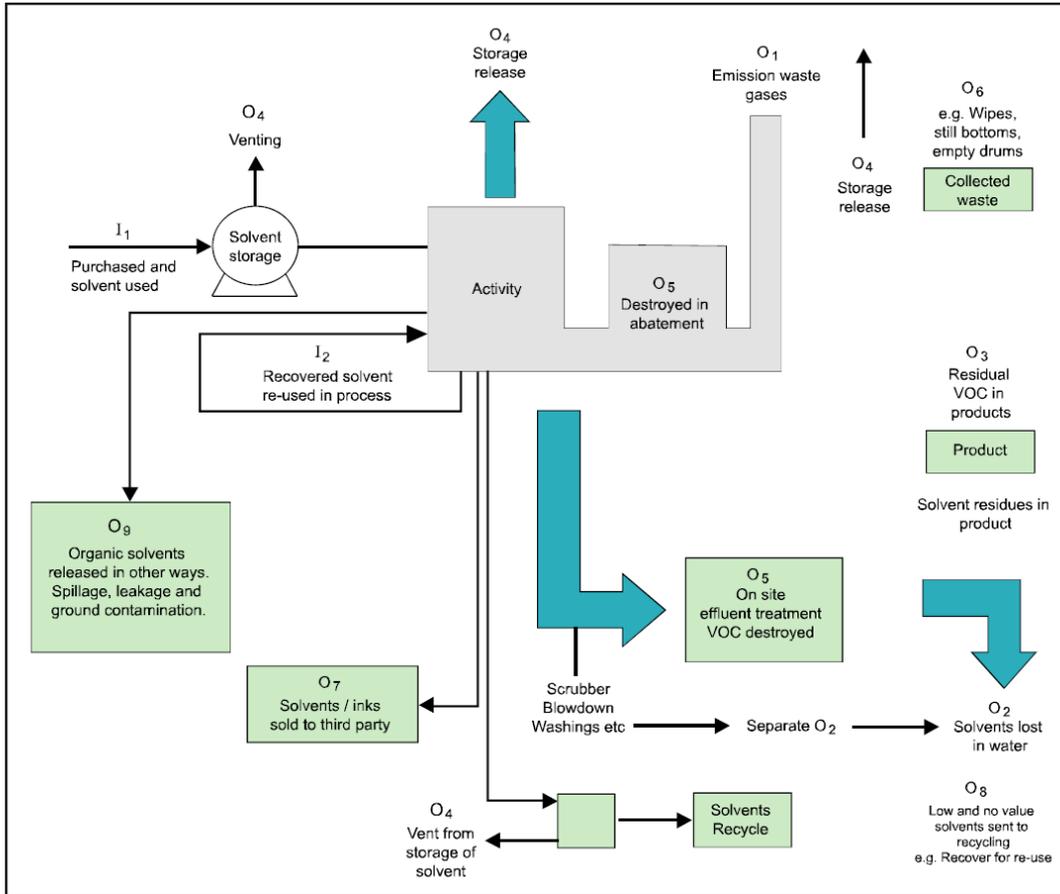
O8 Organic solvents contained in mixtures recovered for reuse but not as input into the process/activity, as long as not counted under O7.

O9 Organic solvents released in other ways.

IS - Initial stock. The amount of materials in litres and the amount of solvent in Kg/l in the stock at the start of the reporting year.

PS – Purchased stock. The amount of materials in litres and the amount of solvent in Kg/l in the stock that has been purchased during the reporting year.

FS – Final stock. The amount of materials in litres and the amount of solvent in Kg/l in the stock at the end of the reporting year.



Appendix 4- Interpretation of Terms

For the purposes of this Permit as its conditions, the following interpretation of terms shall apply:

BAT (Best Available Techniques)

means the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing in principle the basis for emission limit values designed to prevent, and where that is not practicable, generally to reduce emissions and the impact on the environment as a whole.

“best” shall mean most effective in achieving a high general level of protection if the environment as a whole.

“available” techniques shall mean those developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the costs and advantages, whether or not the techniques are used or produced inside the Member State in question, as long as they are reasonably accessible to the operator.

“techniques” includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Suitable BAT techniques for the purposes of this permit are located within Sector Guidance Note SG5 and Process Guidance notes 6/23 and 6/31, and BREF note for surface treatment of metals and plastic.

Annual

Shall mean 1 January to 31 December of each year.

Change in operation

Means a change in the nature or functioning, or an extension of the installation, which may have consequences for the environment, or the implementation of any part of the site closure plan.

Directly associated activities

Means an operation which has a technical connection with the activity, is carried out on the same site as the activity and could have an effect on pollution for the installation.

General meanings

Except where specified otherwise in the Permit:

- Day means any period of 24 consecutive hours
- Week means any period of 7 consecutive days
- Month means a calendar month
- Quarter means a calendar quarter

Incident

Means any of the following situations:

- Where an accident occurs which has caused or may have the potential to cause pollution



- Where any malfunction, breakdown or failure of plant or techniques is detected has caused or may have the potential to cause pollution
- A breach of any condition of this Permit.
- Where any substance, vibration, heat or noise specified in any condition of this permit, is detected in an emission from a source not authorised by a condition and is in a quantity that may cause pollution.
- Where an emission of any pollutant not authorised to be released under any condition of this permit is detected.

Installation and permitted installation

Means a stationary technical unit where one or more activities are carried on, and any other location on the same site where any other directly associated activities are carried on, and references to an installation include references to part of an installation.

Inspection by the regulator

Means a person who is authorised in writing to carry out the duties on behalf of Telford and Wrekin Council.

Reporting year

shall mean 1 January to 31 December of the previous 12 months from the submission date.

Substantial change

Shall mean in the opinion of the Regulator, changes to installation which may have significant negative effects on human health or the environment, or may cause nuisance.

The operator

Means the person(s) or corporate body who has control over the operation of the permit.

End of Permit Conditions