Telford & Wrekin COUNCIL

Pollution Prevention Control Act 1999

The Environmental Permitting (England & Wales) Regulations 2010 (as amended)

Operator	**Grange Fencing Ltd**
Installation Address	Site 1 Halesfield 21 Halesfield Industrial Estate Telford TF7 4PA
Grid Reference	371120 305118
Company Number	1273959
Registered Office	Site 1 Halesfield 21 Halesfield Industrial Estate Telford TF7 4PA

Grange Fencing Limited is hereby permitted by Telford & Wrekin Council to carry on preservation of wood products with chemicals process under Section 6.6(A2) of the Environmental Permitting (England & Wales) Regulations 2010 (as amended) and other activities as listed and described below within the installation boundary marked red on the attached plan reference Appendix 2 and in accordance with the following conditions.

Provenance	Relevant Dates
Date Application Made (Deemed application)	15th March 2015
Date 'Duly Made'	15th March 2015
Date Permit First Issued	10th March 2016
Date of Variations	none
Date of Latest Variation	none

This permit consists of 31 numbered pages

Description of the Installation

The Permitted Activity involves processes for the purpose of the preserving of wood with chemicals (other than sapstain) with a production capacity >75m^3 per day. In this permit the "permitted activity" comprises the whole operation including the treating, handling and storage of any materials used and products and wastes produced by the activities within the Installation Boundary

The following process description divides the Installation into its elements and activities both those activities scheduled under the above regulations and those non-scheduled elements required to be regulated because of their polluting potential and that have a direct association and a technical connection to the scheduled activities:

The installation comprises the following activities and elements:

Activity / Element	Raw Materials	Water	Chemical / Substance used	Curent supplier
1. Raw Material Storage element	Timber	N/A	N/A	Various
2. Pressure Treatment Activity & 3. Drying Element	Timber	√	Wolmanit CX-8WB	BASF Wolman
4a. Main Dipping Plant	Timber	√	Protim Aquatan T5 (621) Golden Brown	Protim Solignum Ltd (Koppers)
4b. Weston Dipping Plant	Timber	√	Protim Aquatan T5 (675) Dark Brown	Protim Solignum Ltd (Koppers)
4c. Mini Dipping Plant	Timber	√	Protim Aquatan T5 (621) Golden Brown	Protim Solignum Ltd (Koppers)
5. AST Dipping Plant Activity	Timber	√	Protek Double 9 Star C	Protek Products
6. Waste Storage element	Process Liquids & Sawdust	√	Various	N/A

All process steps encompassed within the timber treatment activity are supported by specific equipment specifications, process controls, planned maintenance, quality assurance and product verification procedures.

1. Raw material storage element

All deliveries to site are to be booked in through the Purchasing Office to ensure there is no congestion on the yard area, booking slots are allocated to minimise noise, site traffic, avoiding spillages, leaks and emissions.

The storage area for all chemicals is under cover; chemicals must only be located in designated areas. These areas are hard surfaced and bunded.

Dip solution deliveries are by bulk tanker, and are supervised by designated operators. The IBC's are located in a bunded area, and the filling is carried out in this area to ensure any potential spillages are contained

2. Timber pressure treatment activity

The pressure treatment plant is located on the Raw Materials Yard, and is fully covered. Production is planned to optimise the volume of timber in the vessel for each charge.

The plant includes a cylindrical treatment vessel which is 8ft in diameter & 40ft in length, two bulk storage tanks (green and brown colourants) and a treatment shed where the control panel and mixing equipment is located. A 7,000 litre water storage tank is located next to the bulk storage tanks and the site uses recycled surface water collected within the bund to make up the treatment solution.

All of these areas are contained within a concrete bund, with an impermeable surface, and spill containment kerbs. Regular inspections are carried out to monitor the surface condition.

Untreated timber is either transferred from the storage yard, or brought to site by customers before being loaded by fork truck onto bogies on the loading rail. Spacers are added so that timber components are separated within the packs to allow free circulation of air to aid the drying process. The treatment vessel's door is opened bogies are loaded by fork lift truck and the loaded bogies are delivered into the treatment chamber by a dedicated winch system. Once loading is complete the vessel door is closed and secured before the treatment cycle can be activated.

An initial vacuum is applied to remove air out of the vessel and timber charge thus aiding penetration of the preservative chemicals and is held for 30 minutes after which time the chamber is then flooded with chemical increasing the pressure within the vessel, and held for a period of approximately 90 minutes. The vacuum and pressure time cycles vary depending on the particular preservation standard that is to be achieved.

Once the cycle is complete the pressure within the vessel is released via the main flood valve and the treatment vessel emptied of chemical solution by pumping it back to store and a second vacuum is applied for approximately 15minutes to remove any surplus chemical solution and aid drying of the charge.

Once empty the treatment vessel door can be opened. Treated timber is then removed from the treatment vessel for drying

Pressure treatment of wood with chemicals is a scheduled Activity within section 6.6 of the Environmental Permitting (England and Wales) Regulations 2010 (as amended).

3. Pressure treated timber drying element

The treated components are moved by forklift truck from the bogey to the drying area and are stacked on an angle to assist the drying process. The ground surface is impermeable with an Armco drainage channel around the perimeter. This drainage channel runs into the bund around the treatment vessel where it can be pumped out and recycled.

Packs remain on the bunded area to complete the drying process. Once dry, they are moved to storage areas on the raw materials yard by FLT operators. FLT's are hosed down if there are any signs of contamination prior to leaving the bunded area

Treatment tanks are maintained in accordance with preventative maintenance plan.

There is a submersible pump located in the front treatment vessel area which pumps any excess solution from the bunded area around the door, back into a holding tank within the main bund. This is then recycled during the next treatment sequence.

The pressure treated timber drying element of the installation is technically connected and directly associated with the activities falling within Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2010 (as amended).

4. Timber coating treatment activity

The Dip-plants are located in a covered area which adjoins the main production building (4a, 4b & 4c)

The colourant used on the product packs is water based & delivered by tanker. It is pumped directly into 1000kg Industrial Bulk Containers (IBC's) within the Pressure Treatment Plant dripping area. Once the delivery is completed, the filled IBC's are moved for storage to a covered bunded area at the end of the main Dip-plant

The colourant is mixed directly into the dip tanks with the use of an automatic dosatron system which is connected to a single IBC positioned directly next to the plant. Water is added into the dip tank from a holding IBC which has a one-way non-return valve system connected to the main water supply.

The Dip-plants are positioned within bunds that have an impervious concrete floor. There are drainage collection channels along the length of the plant between the two tracks. This runs back towards the relevant dip tank & collects any drips from the packs as they move along the tracks.

The dip tanks are positioned below ground level & are constructed of 6mm steel plate with six 80mm x 80mm RSA stiffeners. It is set in C35 concrete which is 200mm in thickness all around the tank. There is also 2000-gauge polythene between the excavation & the concrete.

Completed product packs are moved from the production workstations by hand pallet-trucks. Packs are secured with strapping before being positioned onto the Dip-plant track. The packs are inverted vertically onto the track at the 'on-load' point. Packs are automatically moved along the track to a dip tank where they are submerged using a hydraulically powered hoist & block system that lifts a frame up & down. Once the pack has been submerged in the colourant for the desired time the pack is raised above the tank so that any excess colourant drains off the packs directly back into the tank. Packs move along to the end of the track to an 'off-load' point at the rear, by which time they are touch dry. Industrial diesel heaters are available within the Dip-plant area to assist with the packs drying when the ambient air temperature is low.

Packs are then inverted to the horizontal position & moved on rollers along a tunnel out to the Bottom Yard area, where the Packs are removed by counterbalance forklift truck & put onto either pallets or pallet-shoes, secured with the use of additional banding straps. Packs are then loaded onto stand trailers ready to be shunted to another site for storage

There are metal collection filter beds alongside the plant which have pneumatic air pipes & an electric filter pump connected to the bottom of the dip tank. The air-flow agitates the colourant & the build-up of sawdust at the bottom of the dip tank. The sawdust is pumped into the filter beds & the excess colourant is pumped back into the tank. The build-up of sawdust is left to dry & then scraped-off into containers for disposal.

Timber coating treatment is a scheduled Activity within section 6.6 of the Environmental Permitting (England and Wales) Regulations 2010 (as amended).

5. AST Dip plant Activity

The AST Dipping-plant is located in a covered building on the Yard adjacent to the production building. The chemicals used to treat the raw material packs are water based & delivered in 1000kg IBC's. These are stored in the covered bunded area at the end of the main Dip-plant.

The solution is mixed into the dip tank by positioning the IBC above the tank with a forklift truck & opening the tap to allow the solution to flow directly into the tank. The amount of chemical required is measured by using the indicator on the side of the IBC. The water is added into the tank through fixed pipework with a non-return valve system connected to the main water supply. There is a lever-valve on the water pipe which is secured with a padlock. The lever-valve is unlocked & turned on to add water into the tank. The amount of water added is calculated in time and is

dependent on the amount of solution added. An overflow ball-cock is situated inside the tank near the top, which automatically cuts off the water flow, shall this level be reached, which is alarmed if activated. An alarm is also fitted to the bund as a further precautionary alert.

The dip tank is positioned above ground & constructed of reinforced steel. There is a further bund around the tank.

Packs of raw material timber components are moved by forklift truck & positioned onto a platform that hydraulically moves up & down into the tank. The platform is automatically lowered into the tank & the packs of timber components are fully submerged. The platform is raised back above the tank & left for any excess preservative to drain directly back into the tank. The platform is purposely angled in order to assist this drainage process. The treated packs are then removed from the platform by forklift truck & positioned in a bunded dripping area adjacent to the AST dip building. The treated packs are stacked on an angle to assist the drying process. The packs are then moved by forklift truck to designated storage areas around the Raw Material Yard ready to be used in the production areas

The AST dip coating treatment is a scheduled Activity within section 6.6 of the Environmental Permitting (England and Wales) Regulations 2010 (as amended

6. Waste storage element

All excessive liquid collected within the bunds is recycled back into the relevant dip tanks. Any excessive sawdust collected within the filter beds is dryed & disposed of.Empty IBC's are stored within the bunded area ready to be re-filled on a later delivery.

Waste storage element of the installation is technically connected and directly associated with the activities falling within Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2010 (as amended).

Table 1. Quantities of Chemicals / Substances Used

Chemical / Substance	Usage (tonnes/annum)	Activity / Element
Wolmanit CX-8WB	38 tonnes	Pressure Treatment Plant
Protim Aquatan T5 (621) Golden Brown	218 tonnes	Main Dipping Plant
Protim Aquatan T5 (675) Dark Brown	20 tonnes	Weston Dipping Plant
Protim Aquatan T5 (621) Golden Brown	Total usage included in main Dip figure	Mini Dipping Plant
Protek Double 9 Star C	24 tonnes	AST Dipping Plant

Table 2. List of plant and equipment concerned with the installation

Activity / Element	Plant or Equipment	Containment Method	Emission points
Pressure Treatment Plant	Treatment Vessel (Leeds & Bradford Co)	Bund	Fugitive/release of liquid from bunded area
Pressure Treatment Plant	Reinforced Steel Mixing Tank (3,000 litres brown)	Bund	Fugitive/release of liquid from bunded area
Pressure Treatment Plant	Reinforced Steel Storage Tank (31,000 litres Green)	Bund	Fugitive/release of liquid from bunded area
Pressure Treatment Plant	Reinforced Plastic Storage Tank (32,000 litres Brown)	Bund	Fugitive/release of liquid from bunded area
Pressure Treatment Plant	NUAIR 50-Ltr Horizontal Air Receiver	Enclosure	Fugitive/release of liquid from bunded area
Main Dip Plant	Reinforced Steel Dipping Tank (3.5m x 2.2m x 2.2m)	Bund	Fugitive/release of liquid from bunded area
Main Dip Plant	Dosetron (D8P150)	IBC / Bund	Fugitive/release of liquid from bunded area
Mini Dip Plant	Reinforced Steel Dipping Tank (3.7m x 2.6m x 2.3m)	Bund	Fugitive/release of liquid from bunded area
Mini Dip Plant	Dosetron (D3RE25)	IBC / Bund	Fugitive/release of liquid from bunded area
Weston Dip Plant	Reinforced Steel Dipping Tank (3.5m x 2.2m x 2.2m)	Bund	Fugitive/release of liquid from bunded area
Weston Dip Plant	Dosetron (D3RE25)	IBC / Bund	Fugitive/release of liquid from bunded area
AST Dip Plant	Reinforced Steel Dipping Tank (1.8m x 2.0m x 6.6m)	Bund / Overfill Alarm	Fugitive/release of liquid from bunded area

Permit Conditions

Plant & Equipment

1.1 The permitted installation shall consist only of that plant and equipment listed in Table 2 (above). No other relevant plant or equipment capable of emitting pollutants to air, land or water shall be used without the prior written consent of the regulator.

Emission Limits and Controls

2.1 There shall be no visible emissions from the permitted installation.

2.2 Emissions from the permitted installation, other than steam or condensed water vapour, shall be free from persistent mist and free from persistent fume.

2.3 All fixed storage tanks shall be fitted with audible and/or visual high-level alarms or volume indicators to warn of overfilling. Where practicable in relation to the viscosity of the material being handled or pumping system used, the filling systems shall be interlocked to the alarm system to prevent overfilling.

2.4 All connections to static bulk tanks shall be sited within a bunded area.

2.5 All appropriate precautions shall be taken to minimise emissions during start-up and shutdown of the treatment plant. The number of start-ups and shutdowns of the treatment plant shall be kept to a minimum.

2.6 The timber treatment vessel shall continue to be fitted with a fully functional interlock that prevents the chamber door being opened until the vessel is completely drained and ambient pressure reached.

2.7 Deliveries to bulk storage tanks shall be supervised by trained personnel to avoid potential accidents and spillage.

2.8 Biocide containing materials shall be stored in closed storage containers.

2.9 The treatment area which consists of the treatment vessels, working vessels, associated pipework and treatment vessel loading area comprising of the treatment plant shall be under cover and protected from the elements to avoid or minimise environmental impact.

2.10 All treatment areas shall have an impermeable surface, spill containment kerbs, sealed construction joints and a bunded exterior to contain treatment solution. The condition of the impervious surface shall be checked regularly and any maintenance recorded.

2.11 Treated Wood packs shall be tilted when stacked to maximise free draining of treatment solution.

2.12 Wood shall be separated in packs by spacers as per the site pinning plan to allow free movement of air during drying and to minimise capillary retention between surfaces.

2.13 Shaped profiles shall be positioned to prevent ponding of treatment solution.

2.14 Plant loading systems shall not be constructed with flat areas or trap areas where treatment solution may pond.

2.15 Wood packs/pieces shall be attached to the body of the plant loading system and secured to prevent movement during treatment.

2.16 Treatment vessels shall be filled with wood packs/pieces to be treated to an optimum capacity to maximise treatment cycle efficiency.

2.17 The treatment vessel shall be locked shut and sealed once the wood pack/plant loading system is loaded and before treatment takes place.

2.18 Process controls shall prevent the operation of the treatment vessel unless the vessel is locked and sealed

2.19 Process controls shall prevent the treatment vessel from opening prior to completion of the treatment cycle and full removal back to storage of all treatment solution from the treatment vessel.

2.20 Process controls shall include a display to show if liquid is present in the treatment vessel.

2.21 In an emergency situation the pressure vessel shall be depressurised through the pressure relief valves and not by opening the door.

2.22 Vehicles in the post treatment drying area must be cleaned in the post treatment drying area prior to egress for service or repair. Cleaning water shall be added to the treatment system.

2.23 Treatment solution shall be drained from the post treatment drying area by a drainage system and returned to the treatment system for re-use.

2.24 Wood packs shall remain on the post treatment drying area until such times as the packs are defined as dry. To be defined as dry a pack shall be lifted by mechanical means and shall be suspended above the post treatment drying area for a minimum of 5 minutes. The pack shall not form drips or drip treatment solution during this period.

2.25 The Operator shall develop a reporting system which records the movement of a pack onto and off of the post treatment drying area this report shall include:- a specific pack identifier, date and time of addition and removal, weather conditions and signature of person responsible for accepting dry condition.

2.26 Once defined as dry, packs shall be removed from the post treatment drying area. Where practical MHE equipment used for pack movement shall remain within the post treatment drying area.

2.27 There shall be no intentional point source emissions of List I and List II substances as defined by the Water Framework Directive to groundwater

2.28 All liquid storage tanks shall be located within bunds that are designed, constructed and located following to appropriate standards and ensuring that the volume is more than 110% of the largest tank or 25 per cent of the total volume you stored, whichever is greater.

2.29 All tanks bunds and sumps shall be subject to regular visual inspection, as agreed with the regulator, and placed on a preventative maintenance programme. The contents of bunds and sumps shall be pumped out or otherwise removed as soon as is practicable after checking for contamination.

2.30 Operators shall use an effective Environmental Management System with policies and procedures for environmental compliance and improvements. Audits shall be carried out against those procedures at regular intervals.

2.31 The operator shall adopt procedures to control the specification of those types of raw materials with the main potential for environmental impact, such as the preservatives used in the process in order to minimise any such impact. An annual review of alternative raw materials shall be carried out with regard to environmental impact.

2.32 Substances or mixtures which are assigned or need to carry hazard statement designations H340, H350, H350i, H360D, or H360F shall be replaced, as far as possible by less harmful substances and mixtures within the shortest possible time.

Monitoring, Sampling and Measurement of Emissions

3.1 The installation shall be observed for visible or odourous emissions at least once per day, or more often as may be prescribed in writing by the regulating authority, from a point or points providing an unimpeded view of the emissions points for the prescribed process. In the event of visible emissions being observed, immediate action shall be taken to (determine the cause of) and resolve the malfunction responsible for the emission, and, if necessary, action shall be taken to abate the emission.

Contingency arrangements shall be instigated to prevent or reduce to a minimum any further visible emissions caused by the malfunction. The regulator shall be notified of any such occurrence as soon as practicable.

The results of the observations shall be recorded in the logbook (required to be kept by condition 3.2), along with details of remedial action taken.

3.2 A logbook shall be established and maintained which contains a record of all visual observations made in accordance with condition 3.1 and the results of the monitoring programme carried out in accordance with conditions 3.4 and 3.5. The records shall include the time and date of the observations, the location from which the observations were made, the wind direction, the weather conditions, the likely source of the emissions to air, details of any corrective action taken, and the name and position within the Company of the person undertaking the observations. The logbook shall be kept available for inspection by an authorised officer from the regulating authority at the premises occupied by the Company, and the records shall be retained for at least two years. The log may be paper based or electronic.

The results of all continuous monitoring shall be recorded (in a form to be agreed with the regulator within 3 months of issue of the permit), and retained for at least two years. These results shall be made available for inspection by an authorised officer of regulating authority on request. All results from periodic monitoring exercises shall be retained for at least two years from the date of the same. The log book shall also include any other information or documentation as may be required to be kept by other conditions within this permit.

Materials Handling

4.1 The raw materials used in the installation and all waste materials produced from the activities therein shall be handled with care to prevent or reduce to an absolute minimum any emissions to air, land or water.

4.2 Spillages of liquids and finely divided materials shall be cleaned up immediately. Liquid spillages shall be contained and cleaned up by the use of a suitable absorbent material. Spillages of finely divided or powdery materials shall be cleaned with an industrial grade vacuum cleaner or by wet cleaning methods. Dry sweeping shall not be permitted.

4.3 All raw materials and waste materials shall be delivered only into dedicated storage and waste storage areas where spillage can be controlled and contained and nowhere else within the installation.

4.4 Drums and containers containing liquid materials, whether full, partly full or empty, shall be stored in a secure, well-ventilated storage area as noted in condition 4.3 (above). All full, partly full or empty drums and containers shall be kept tightly closed to prevent any emissions to air.

General Conditions

5.1 Regular cleaning and effective preventative maintenance in accordance with the manufacturer's instructions shall be employed on all plant, equipment and ductwork concerned with the emission, capture, transport and control of emissions to atmosphere. Such cleaning and maintenance procedures shall be updated from time to time as may be necessary to account for changes in working practice or plant and machinery or solvents used. Records of such preventative maintenance shall be kept readily available for inspection.

Spares and consumables, in particular, those subject to continual wear, shall be held on site, or shall be available at short notice so that plant breakdowns can be rectified rapidly.

5.2 Staff at all levels shall receive the necessary formal training and instruction in their duties relating to control of the process and emissions to air. Records shall be kept which detail all relevant training provided to staff, the records shall be made available for inspection by an authorised officer from the regulating authority. Records of training shall be retained for two years.

5.3 If there is any intention to make any relevant change to any aspect of the installation from that described in this permit, or any other aspect which may affect the substances or concentration of substances set out in condition 2.3 being emitted to air, the regulating authority shall be notified of the proposed changes at least 4 weeks before the changes take place.

5.4 Any malfunction which results in emissions to atmosphere which are likely to cause an adverse effect on the local community shall be reported to the regulator as soon as reasonably practicable, and a record shall be made of the incident within the logbook required by condition 3.2.

5.5 The best available techniques shall be used to prevent or, where that is not practicable, reduce emissions 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.

Air Quality

6.1 If so required by the Borough of Telford and Wrekin, the operator shall prepare a list of all emission points, and related pollutant emissions to atmosphere based on Table 2 (above).

Protection of Soil and Groundwater

7.1 There shall be no emission of any pollutants to groundwater or soil from the permitted Installation.

7.2 Plans shall be maintained that identify the configuration and specification of all drains and subsurface pipe-work and the position and purpose of all sub-surface sumps and storage vessels that are used or have been used within the permitted installation from the date of this permit until the permit is surrendered.

7.3 A record shall be maintained of any incident that has, or might have, impacted on the condition of any soil or groundwater under the permitted installation, either as a result of that incident or as a result of an accumulation of incidents, together with a record of any further investigation or remediation work carried out.

7.4 Notwithstanding the requirements of any other condition requiring records to be kept for a limited period of time the record required by Condition 7.3 shall be preserved until this permit is surrendered.

7.5 At least every 4 years, a systematic assessment shall be carried out of all measures used to prevent emissions from the permitted installation to soil and groundwater. A written report of each assessment shall be recorded and reported to the Regulator. The report shall include details of and timescales for any additional measures that are required to prevent emissions to soil and groundwater.

7.6 The Operator shall carry out an assessment to identify the risks posed by fork truck movement in and out of the timber treatment facility and the potential for treatment chemicals to be released into the environment. The assessment shall be provided in writing to the regulating authority no later than 7th July 2016 and will contain:

a) A statement of the perceived risks along with their significance;
b) A list of control measures that are currently in place; and
c) Any proposed control measures identified as a result of the assessment.

Soil and Groundwater Monitoring

8.1 The Operator of the installation shall devise and submit a detailed groundwater monitoring plan within a period of no more than 5 years from the date of issue of this Permit. The monitoring plan shall be devised at least three months in advance of carrying out the monitoring and shall include locations at which monitoring is to be carried out and the methodology which shall be used. The proposed groundwater monitoring plan shall be submitted to the regulating authority no later than 30th April 2020.

8.2 The monitoring plan required by shall detail the chemicals used at the installation over the previous 5 years identifying the active ingredients hazardous to the environment and the analysis proposed to be undertaken. It shall also contain details and locations of any boreholes required in order to undertake the monitoring.

8.3 Once the plan required in condition 8.1 is approved by the Council the operator shall instigate the monitoring plan and report the results to the council no later than the 30th September 2020. The report shall include interpretation of the results with reference to previous monitoring undertaken (including the site and where applicable baseline reports) and operations at the permitted installation and details of corrective actions that are required to protect groundwater and remedy any contamination that has occurred as a result of permitted activities.

8.4 The Operator of the installation shall devise and submit a detailed soil monitoring plan within a period of no more than 10 years from the date of issue of this Permit. The monitoring plan shall be devised at least three months in advance of carrying out the monitoring and shall include locations at which monitoring is to be carried out and the methodology which shall be used. The proposed soil monitoring plan shall be submitted to the regulating authority no later than 30th April 2025.

8.5 The monitoring plan required by Condition 8.4 shall detail the chemicals used at the installation over the previous 10 years identifying the active ingredients hazardous to the environment and the analysis proposed to be undertaken. It shall also contain details and locations of where it is proposed to undertake the monitoring.

8.6 Once the plan required in condition 8.4 is approved by the Council the operator shall instigate the monitoring plan and report the results to the council no later than the 30th September 2025. The report shall include interpretation of the results with reference to previous monitoring undertaken (including the site and where applicable baseline reports) and operations at the permitted installation and details of corrective actions that are required to protect groundwater and remedy any contamination that has occurred as a result of permitted activities.

8.7 The plans required by Conditions 8.1 and 8.4 shall be reviewed no later than 6 months after each monitoring event. The purpose of the review shall be to determine whether any changes to monitoring locations, frequency or parameters are required and where changes are proposed, submit revised monitoring plans to Somewhere Council.

8.8 Notwithstanding the requirements of Condition 2.2.3, all plans, monitoring and assessment reports undertaken in accordance with Conditions 8.1, 8.2, 8.3, 8.4, 8.5, 8.6 and 8.7 shall be preserved until this Permit is surrendered.

8.9 All boreholes / wells created to meet the monitoring requirements of Conditions 8.1 and 8.4 shall be maintained in a condition fit for purpose, unless otherwise agreed in writing by the regulating authority. Where the function of a borehole / well is compromised it shall be repaired or replaced to allow sample collection in accordance with Conditions 8.1 and 8.4.

8.10 All boreholes / wells shall remain capped whilst not in use.

9 Land Contamination

9.1 Before this permit can be surrendered the operator shall provide the regulator with a validated report showing that all contamination of the site by chemicals listed in Table 1 of any variant of this permit have been so treated as to bring the site back to the same state as before the issue of this permit.

9.2 To this end the operator shall;
Within six months of the issue of this permit provide a ground contamination report that shows the levels of chemicals listed in Table 1 of this permit that have leached into the site before the issue of this permit.
or;
Provide the regulator with a certificate that the operator agrees that all ground contamination of the site with the chemicals listed in Table 1 will be removed from the site before the permit is surrendered.

9.3 The operator shall before 30th April 2016

- Devise and record a management plan for ensuring that the installation site hard covering is maintained in such a manner as to remain impervious to any of the items listed in Table 1.
- All drains within the installation shall be identified and a written management plan shall be implemented for ensuring that any items listed in Table 1 are prevented from entering the drains.
- submit to the regulator a management plan for the control of solvents and inks when they are moved outside any bunded area.

9.4 On completion of the management plans required in condition 9.3 the operator will instigate any improvement measures identified as being required in that plan and devise an improvement plan to be agreed by the regulating authority.

10 Noise Emissions

10.1 The operator shall:

- Carry out a survey of the installation and identify any plant or equipment likely to give rise to noise. The survey shall specifically identify plant or equipment capable of being heard at the installation boundary.
- Annually review the noise survey of the installation such that any changes to the plant or equipment noted in Table 2 (above) are identified and the survey updated appropriately.
- Construct a noise management plan based on the survey which shall include the following:
  - ≈ A statement of policy with regard to dealing with complaints
  - ≈ A documented complaint procedure for the investigation, analysis, determination, and solution to noise problems
  - ≈ Details of routine maintenance undertaken in particular to deal with noise issues
- Construct a register of complaints regarding noise emissions from the installation

The operator shall provide the above information by 1st April 2016 and thereafter shall update the information annually or upon written request from the regulator. All documentation required to be produced by this condition shall be retained in the log book required to be kept in accordance with condition 3.2.

10.2 It shall be an absolute requirement that any new plant or equipment brought into the installation, or any plant or equipment that undergoes significant modification, shall demonstrate Best Available Technique (BAT).

Unless already meeting BAT requirements, the operator shall demonstrate that sound power levels for substantially changed plant or equipment shall be lower than for existing. The procedure listed in condition 10.3 below shall be used.

10.3 No new plant or equipment shall be permitted within the installation except where:

(i) The plant or equipment can be demonstrated to have a minimal environmental impact. For the purpose of this condition 'minimal' shall be taken to mean that, the plant or equipment, if monitored under requirements of BS4142:2014, has a rating level of 0dB (when compared to the background level), or is otherwise inaudible.

or

(ii) Where plant or equipment cannot be demonstrated to meet the standard above, a full noise survey shall be carried out and the results modelled to show the specific impact of the new plant or equipment on the environment. The modelling exercise shall take account of any relevant noise abatement measures. The results of the modelling shall be submitted to the regulator and shall demonstrate BAT.
The modelled plant or equipment shall be permitted within the installation only where written consent of the regulator has been obtained.

10.4 In the event of the regulator receiving a complaint of noise associated with any element or activity within the installation boundary, the operator shall:

(i) Be required to investigate the source of the complaint.

(ii) Carry out such monitoring, surveys or modelling of the source of the complaint to demonstrate, to the satisfaction of the regulator, either:

(a) that the complaint is unfounded, or

(b) the complaint has substance.

Where (ii)(b) above is found to be the case, the operator shall arrange to carry out such works or change procedures or processes in such a way, that a re-assessment carried out in (ii) above comes to the conclusion in (ii)(a).

All time scales in relation to aspect of this condition to be set by the regulator in the event of complaint being received. Typically, 10.4(i) shall take no longer than 48hrs from the date of notification, whilst 10.4(ii) may take considerably longer dependent on the work required to be undertaken.

11 Waste Minimisation

11.1 The operator shall:

- Maintain an inventory covering the principal types of raw materials used (as listed in Tables 1) and be made available to the regulator based on consumption of raw materials for the previous year.
- Review alternatives for the principal types of raw materials used with regard to their environmental impact. Such reviews shall be made available to the regulator every four years.
- Maintain records to demonstrate that quality control procedures are used to minimise any potential environmental impact of raw materials Notably this shall include ensuring that raw materials are free from contamination, and are supplied and stored in a manner such that contamination cannot occur
- Undertake to complete any long term studies needed into the less polluting options and make any material substitutions identified within the review period. Such studies will be identified as and when required by the regulator and requested in writing.

  All information required by this condition shall be made available to the regulator , or where such information is requested every four years from the date of issue of the permit as may be required for long term studies. All such information shall be retained by the operator and kept with the log book required to be kept in accordance with condition 3.2.

11.2 The operator shall demonstrate that a systematic approach to the reduction of waste at source is being used.

The operator shall carry out a waste minimisation audit every 6 years. The methodology used and an action plan for optimising the use of raw materials shall be submitted to the regulator within 2 months of completion of the audit.

Specific improvements resulting from the recommendations of audits shall be carried out within a timescale approved by the regulator.

11.3 The operator shall, within 4 weeks of submitting the information required by condition 11.1, also calculate the following indicators of waste minimisation performance expressed as a ratio:

(i) Tonnes or litres of preservative consumed v tonnes of good product.
(ii) Tonnes water consumed v tonnes of good product
(ii) Where any of the above parameters are not specifically monitored, arrangements shall be made to undertake monitoring of the use of the material within 8 weeks of issue of this permit. All such information shall be retained by the operator and kept with the log book required to be kept in accordance with condition 3.2.

12 Water use

12.1 A water efficiency audit shall be completed on an annual basis; opportunities for reduction in water use shall be assessed and, where appropriate, shall be carried out in accordance with a timescale approved by the regulator.

12.2 Information from audits shall be used to establish benchmarks. Operators shall keep records of such benchmarks and make measurement against them to reveal whether the process is being maintained "in control" or to track improvements.

12.3 The volume of mains and abstracted water used in the activities shall be directly measured when the installation is operating under normal production conditions for a sufficient period to determine the base use of the activity. Thereafter, an annual exercise shall be completed to confirm the measurement. All measurements shall be recorded and the records held on site.

13 Energy Efficiency

13.1 The operator shall produce an annual report on the energy consumption of the installation. The report shall monitor energy usage for the installation and identify target areas for reduction and shall be updated annually. ("Sankey" diagrams and energy balances would be useful as aids.)

13.4 The operator shall ensure that all plant listed in Table 2 is operated and maintained to optimise the use and minimise the loss of energy.

13.5 The operator shall also calculate the following indicators of energy efficiency performance expressed as a ratio:

(i) Prime energy v good tonnes produced.
(ii) Electricity v good tonnes produced.
All such information shall be retained by the operator and kept with the log book required to be kept in accordance with condition 3.2.

Where any of the above parameters are not specifically monitored, arrangements shall be made to undertake monitoring of the use of the energy source within 8 weeks of issue of this permit.

13.6 In respect of energy efficiency, the operator shall meet the requirements of either:
(i) Climate Change Agreement (CCA), or
(ii) Direct Participation Agreement (DPA);
(iii) Energy Savings Opportunity Scheme (ESOS)
in addition to the requirements of conditions 13.1 to 13.5 (above).

14 Prevention of Accidents

14.1 The operator shall produce an accident 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. The plan shall identify:

- the actions to be taken to minimise these potential occurrences; and
- the actions to deal with such occurrences so as to limit their consequences

In the case of abnormal emissions arising from an accident, such as a spillage for example, the operator shall:

- investigate immediately and undertake remedial action as soon as practicable.
- promptly record the events and actions taken.
- ensure the regulator is made aware, as soon as practicable.

In the event of an accident occurring, the operator shall follow the prescribed instructions within the accident management plan. In an emergency situation it shall be sufficient to demonstrate that any divergence from the plan was necessary either:

- in the interests of health and safety.
- as a result of instructions from a suitably qualified member of the emergency services (fire, ambulance, police).
- as a result of instructions from a duly authorised officer of the Health and Safety Executive.
- as a result of instructions from the regulator.
- As a result of instructions from a duly authorised officer of the Environment Agency.

14.2 The accident management plan shall be reviewed annually and a copy shall be submitted to the regulator upon written request. A copy of the accident management plan shall be kept with the logbook required to be kept be condition 3.2.

14.3 The information shall be recorded in a form to be agreed with the regulator but can include both electronic and hard copies, and shall be retained for at least two years. This information shall be made available for inspection by an authorised officer of regulating authority on request. Where information is updated or modified, copies of the modified information shall replace those held within the logbook.

15 Decommissioning the Installation

15.1 A site decommissioning plan shall be submitted to the regulator within 6 months of issue of this permit. The plan shall be prepared and updated as may be necessary due to changes in plant, equipment or materials used within the installation. In any event the plan shall be reviewed and resubmitted every 3 years from the date of the first submission. The plan shall include:

- A complete methodology to be adopted in the decommissioning of the installation, to include:
  - Removal of key plant or machinery likely to be contaminated.
  - Removal of contamination associated with the plant and machinery.
  - Minimising any contamination from the installation buildings during demolition.
  - Removal of contaminated subsurface infrastructure as may be necessary.
- An assessment of the impact of decommissioning on the nearest sensitive receptors.
- The Preparation of a ground contamination report to include the testing of soil within the decommissioned installation to demonstrate contamination levels are no greater than those submitted in Operators application site reports.

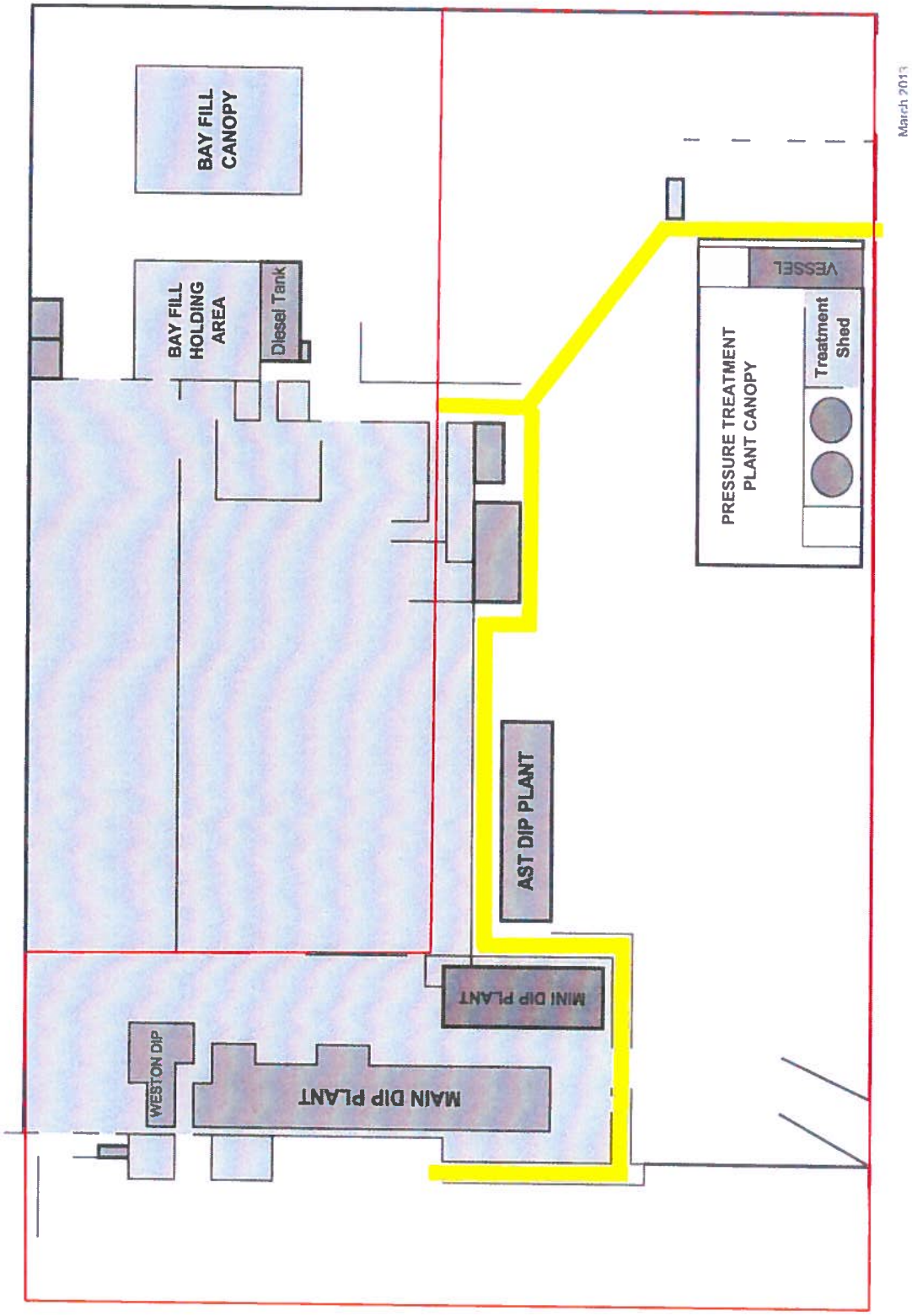
In relation to this permit, any reference to the 'Local Authority' or 'the regulator' shall mean the Borough of Telford and Wrekin. Any information required by this authorisation to be sent to the Local Authority or the regulator shall be sent to the address noted below:

Signed.....C.L..... Date.....10th March 2016.
SCIENTIFIC OFFICER

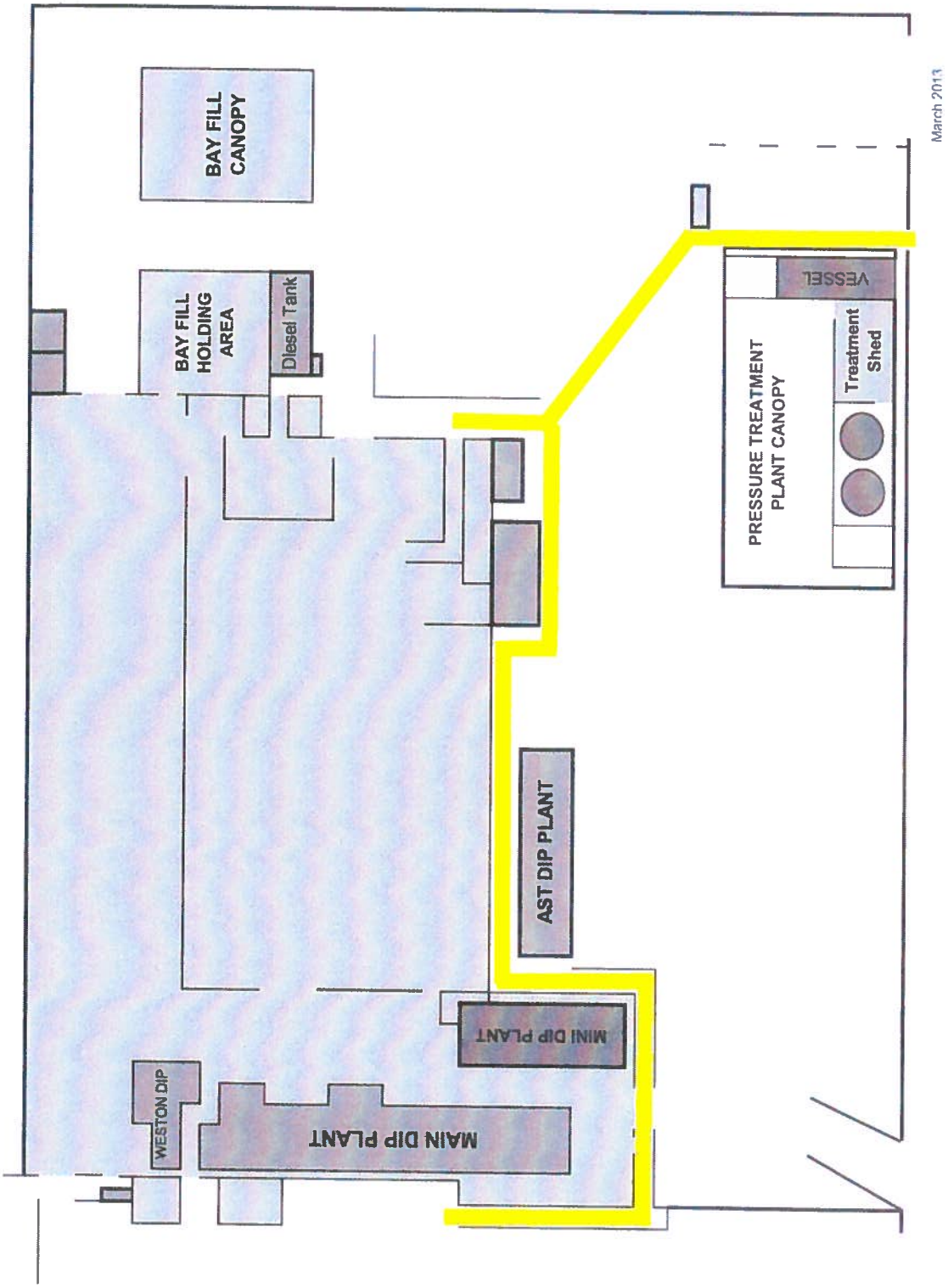
Authorised by the Borough of Telford and Wrekin
To sign in that behalf

Borough of Telford & Wrekin
Environment Team
Public Protection,
7th Floor Darby House
Lawn Central
Telford TF3 4LE

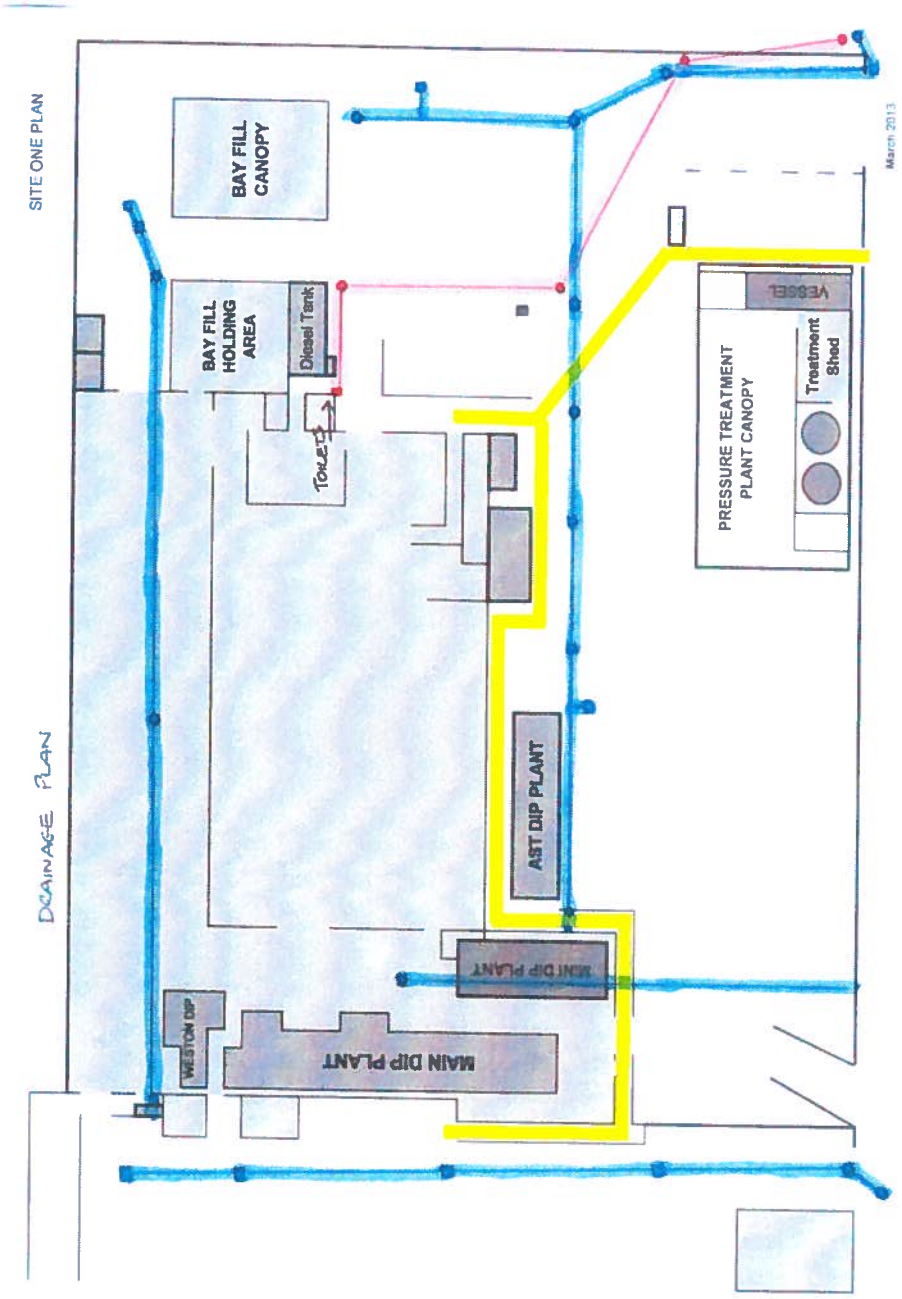
Appendix 1 Installation Boundary (in Red)



Appendix 2 Plant and equipment layout



Appendix 3 Site Drainage Plan



Glossary of Terms/Definitions:

Activity	One or more stationary technical units falling within the defined sections of the Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2010
Coating	Means a preparation, including all the organic solvents or preparations containing organic solvents necessary for its proper application, which is used in a vehicle refinishing activity to spray onto a motor vehicle.
ELV	Emission Limit Values, those values stipulated in the SED or in guidance for emission of particular pollutants to atmosphere.
Halogenated Organic solvent	shall mean an organic solvent which contains at least one atom of bromine, chlorine, fluorine or iodine per molecule
Installation	One or more stationary technical units comprising at least one activity or activities falling within the description of Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2007 within a defined area.
LEV	Local Exhaust Ventilation – ducting and hoods normally associated with small uncontained plant or equipment.
Organic solvent	Means any VOC which is used alone or in combination with other agents, and without undergoing a chemical change, to dissolve raw materials, products or waste materials, or is used as a cleaning agent to dissolve contaminants, or as a dissolver, or as a dispersion medium, or as a viscosity adjuster, or as a surface tension adjuster, or a plasticiser, or as a preservative.
Organic compound	Means any compound containing at least the element carbon and one or more of hydrogen, halogens, oxygen, sulphur, phosphorus, silicon or nitrogen, with the exception of carbon oxides and inorganic carbonates and bicarbonates.
EPR	Environmental Permitting Regulations , the new pollution control regime replacing that under PPC.
Regulator	Means the Pollution Control Section of the Telford & Wrekin Council. When contacting the regulator it is not sufficient to contact any other part of the council other than the Pollution Control Section at the address specified in the additional notes or at the telephone numbers provided.

Designated risk phrase	the designation or label given to a coating or preparation (as a whole). The mere fact that a preparation or coating contains r-phase chemicals does not in itself always make a material r-phrase.
STU	Stationary Technical Unit shall have the same meaning as in the Pollution Prevention and Control Regulations, but in summary shall mean, one machine used for the purpose of printing on flexible packaging or one machine used in connection with that activity, e.g. an RTO. There must be at least 1 STU per activity, but it is possible to have multiple STU's still comprising only one activity.
Volatile Organic Compound (VOC)	Shall mean any organic compound having at 293,15 K a vapour pressure of 0.01 kPa or more, or having a corresponding volatility under the particular conditions of use. For the purpose of the Solvents Emissions Directive, the fraction of creosote which exceeds this value of vapour pressure at 293.15 K shall be considered as a VOC.
Bag filter	These are fabric filters and are comprised of a filter medium, usually manufactured in the form of bags, through which material over a certain size cannot pass. There are three types: mechanical shakedown, reverse air jet and pulse jet. Bags are capable of filtration of finer particles than cyclones, but do not perform well with wet particulate such as wood with a moisture content > 20% (i.e. they clog up).
Indicative monitoring	Monitoring which measures the performance of the abatement plant, rather than the quantity of dust etc emitted. In the case of bag filtration, this is normally achieved by alarming the pressure drop across the abatement plant, so that an alarm is set off should a bag / sleeve split.
Ringelmann Chart	A chart set by British Standard B.S.2742:2009 which divides smoke into 4 shades by colour. Shades 2 to 3 are dark and 4 is black.
IBC	Intermediate Bulk Container: A 1000 litre container mounted on a euro-pallet and provided with a means of connecting the container into the process directly. It removes the need to decant liquids from one place to another and the attendant risk of spillage.

This note does not comprise part of the permit, but contains guidance relevant to it.

Inspections

Regular inspections will be made by officers of Telford & Wrekin Council (without prior notice), in order to check and ensure full compliance with this permit.

BAT (Best Available Techniques)

Article 2(11) of the IPPC Directive defines "best available techniques" as follows:
"*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*".

- "techniques" shall include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned,
- "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,
- "best" shall mean most effective in achieving a high general level of protection if the environment as a whole.

In determining the best available techniques, special consideration shall be given to the items listed in Annex IV of the Directive.

Health and Safety at Work and Other Statutory Requirements

Compliance with this permit does not necessarily infer compliance with any other legislation.

Notification of Operation Changes

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

The operator shall contact the regulator to discuss any proposed changes.

Enforcement

The operator will be liable to enforcement action where: -

a) the operator fails to comply with or contravenes any permit condition;

b) a change is made to the installation operation without prior notification of the change to the regulator;

c) intentional false entries are made in any record required to be kept under the conditions of the permit;

d) false or misleading statement is made.

Any enforcement action is taken in accordance with the regulator's enforcement policy.

Annual Subsistence Charge

A subsistence charge is payable on the 1st April each year. An invoice will be issued by the regulator providing further details of how to pay. The charges are based on a risk based system. Details of the risk assessment can be found at http://www.defra.gov.uk/environment/quality/pollution/ppc/localauth/fees-risk/fees.htm

Appeal against Regulatory Action

The operator can appeal against regulatory action by the regulator to the Secretary of State for Environment, Food & Rural Affairs. Appeals must be sent to the Secretary of State on a form found at
http://www.planning-inspectorate.gov.uk/pins/environment/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 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 Act allows the Secretary of State in addition to quash any of the other conditions not subject to the appeal and to direct the local authority either to vary any of these other conditions or to add new conditions.

Contact Numbers for the Regulator

The Regulator is the Pollution Control Section of Telford & Wrekin Council. They can be contacted on 01952 381818. You may also contact them by email at any time. Environmental.health@telford.gov.uk

Correspondence Address

All correspondence to Telford & Wrekin Council relating to this information shall be addressed
Environmental Health, Telford & Wrekin Council, Darby House, P.O. Box 214, Telford, TF3 4LE