



<b>Operator</b>	<b>Babcock DSG Limited</b>
<b>Installation Address</b>	Building B15 Donnington Telford TF2 8JT
<b>Permit Reference</b>	07/00009/PPCB/070420
<b>Grid Reference</b>	SJ700139
<b>Registered Office</b>	Babcock DSG Ltd 33 Wigmore Street London W1U 1QX

Babcock DSG Ltd is hereby permitted by Telford & Wrekin Council to carry out the activity of coating of metal with coatings containing organic solvents with an annual usage above 5 tonnes as defined under Schedule 1, Part 2, Section 6.4, Part B(a)(iv); and Schedule 14 The Environmental Permitting (England and Wales) Regulations 2016 ("The Regulations") and other directly associated activities as listed and described below within the installation boundary marked in blue on the attached plan in Appendix 1 and in accordance with the conditions within this permit.

Signed:

**Name: Clair Travis**  
**Environmental Health Consultant**

**Date: 7 April 2020**

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



Provenance	Relevant Dates
Date Application Made (Deemed application)	01.04.04
Date 'Duly Made'	N/A
Date Permit First Issued	11.12.07
Date of Variations	17.06.08
Date of Variation	7 April 2020

**Introductory Note** – This Introductory note does not form part of the permit.

### **Determination of application**

Particular conditions have been inserted as representing the authority's judgement of what constitutes BAT, having regard to the statutory guidance issued by the Secretary of State and to all site specific considerations.

### **Description of the Installation**

This site carries out the activity of the preparation and recoating of metal surfaces using, phosphating surface cleaning, shotblasting, and coating with solvent and powder based coatings.

The following numbered areas associated with the activities listed within the permit.

C8 – preparation and pre-repair, shot blast, metal spray & paint carousel + small booth.

C23 – rebuild of parts, padding and fibre glass.

C34 – Material storehouse including paint storage.

C35 – Shot blast, phosphating, paint and powder coat.

C37 – Waste management area for the site. Bunded storage and skips

C43 – Large external paint booth situated next to C8

C90 – Smaller external paint booth situated next to C8

Large parts are brought into the building and loaded into a turn over within the media booth where all paint is removed using the grit blast process. The waste grit is passed through a recovery system and the air from this process is filtered before being exhausted through the external stack tower.

The parts are then sent for inspection and any machining, welding, metal spray and fabrication is completed. Once at the correct specification the part is loaded onto a turn over stand mounted on a trolley and transported to the paint booth. The primer coat & elastomeric primer is applied via manual application using a wet solvent based coating. The hull is baked within the booth at a specified temperature for specific duration. Once the base coats are applied the specified the top coat is applied in the specific colour. During the process the booth has a filtered air feed and filtered extraction system which passed to atmosphere via the roof mounted stacks.

**Welding** – The site completed the ferrous and non-ferrous welding on assemblies and kits as they pass through the repair process. The welding points have fume extraction fitted which vents externally and is subjected to annual inspection & service maintenance. Across the site there is Oxy Acetylene, MIG, TIG, ARC & Eutectic.

**Padding** – Areas of the vehicles are covered internally with padding prior to the vehicle being assembled. The padding is coated with contact adhesive and left to cure over two downdraft benches prior to being fitted to the vehicle hull.

**Fiberglass** – Repairs to fibreglass components fitted to the vehicles, repairs are made to items that have become damaged or cracked and are cost effective to repair. This is a mixture of stowage bins, battery tray, assembly cases, air conducting and toilet. The area has a clean air feed and two extraction abatement towers which extract from the rear of a bench and a downdraft bench externally.

Any waste paint is poured into a 205lt drum and the paint guns washed out using 'Jack Hammer'. The paint tins are crushed and loaded into a Flam Vault. Contaminated coveralls, rags and masking materials and placed into the designated waste bin. All waste is correctly labelled and sent to C37 for disposal via the approved contractor.

The painted parts are then delivered to rebuild, the overhauled components are then reassembled. Once in a completed state it is returned to the C37 paint booth where it is cleaned with dry ice, masked and painted in the final top coat of paint. During the process the booth has a filtered air feed and filtered extraction system which passed to atmosphere via the roof mounted stacks.

The smaller parts are sent to the relevant area from inspection and assessment. They are then passed through the repair process. Parts are sent through the manual or automated shot blast process, from this they are sent back to the specific loading department where any repairs, welding or fabrication is completed. Once the metal component is to the correct standard it is sent to the paint booth or carousal where a wet solvent base coat and top coat are manually applied. The main paint booths either operate a filtered air system in and out of the booth. The carousel & C35 paint booth has a water curtain to capture the majority of the overspray particulates and solvents. All booths extract externally. Any waste paint is poured into a 205lt drum and the paint guns washed out using 'Jack Hammer'. The paint tins are crushed and loaded into a Flam Vault. Contaminated coveralls, rags and masking materials and placed into the designated waste bin. All waste is correctly labelled and sent to C37 for disposal via the approved contractor.

The Phosphating process is completed within building C35. The parts loaded for repair are issued to the building and loaded to the shop floor operatives in batch quantities. Following inspection the parts that require repair are loaded into metal trays and moved to the cleaning area to be loaded into the automated tumble blast shot machines. Once all paint has been removed the ferrous items are suspended into the phosphating cages.

There is a three tank system which is manually loaded via an overhead crane positioned on a track above the tanks. 1st tank is a cold fresh water clean. 2nd tank is the phosphate solution which is a ratio mixture of CG 110R, Sodium Hydroxide and



water in a heated bath. Weekly sample plates are sent for analysis and there is a daily dip test to confirm that the solution is at the correct strength to meet standards

The Tank volumes are:-

Clean rinse – 0.36 m<sup>3</sup> - Water

Zinc Phosphate - 0.36 m<sup>3</sup> - CG 110R, Sodium Hydroxide and water

Final rinse – 0.76 m<sup>3</sup> - Water

Once the parts are dipped through the three tanks they are drained and then loaded into an oven to dry the phosphate the unloaded and sent to the Paint department for masking.

#### **Solvent Emissions – Schedule 14**

The Operator has decided to use the Reduction Scheme as a method of compliance. Conditions within the Permit reflect this option.

#### **End of Introductory Note**

## Permit Conditions

### General

1. The Operator is permitted to carry out the regulated activities and directly associated activities described in Table 1 subject to the conditions of this permit.

<b>Table 1 – Permitted activities</b>		
<b>Activities listed in Environmental Permitting (England and Wales) Regulations 2016</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
Coating of metal using coating containing organic solvents with an annual usage of more than 5 tonnes per annum as described under Schedule 1, Part 2, Section 6.4, Part B(a)(iv)	The coating of prepared metal components using liquid coatings containing organic solvents	From receipt of raw materials, through to the disposal of waste materials. This includes treating, handling, mixing and storage of organic solvents used for the cleaning, coating, and finishing of metal products at the installation. Also included is the curing of the coated metals, the storage of finished goods and the storage of waste materials containing organic solvents
Schedule 14 Other coating activity	coating of metal with coating containing organic solvents	
<b>Directly associated Activities</b>	<b>Description</b>	<b>Limits of specified directly associated activity</b>
Surface treatment of metal	Surface treatment of metals using zinc phosphate, sodium hydroxide and water	From the receipt of raw materials to the disposal of waste materials. This includes the surface treatment of metal and the curing of treated metal
Metal surface preparation – shot blasting	cleaning the surface of the uncoated item prior to the application of the coating to remove any contaminants, using metal shot as a substrate for cleaning	From the receipt of shot, through to the disposal of waste materials. This includes the treatment of the surface using shot blasting methods, the handling of dusty materials, the extraction and containment of particulate matter emissions, the storage and handling of waste materials.
Powder coating of metal	The application of organic powders using electrostatic spray techniques	From the receipt of powder coating, through to the disposal of waste materials. This includes the treatment of the surface using electrostatic powder coating techniques within dedicated booths, the curing of coatings to metal, the handling of dusty materials, the extraction and containment of particulate matter emissions, the storage and handling of waste materials.



2. 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.
3. 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.
4. 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.
5. 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.
6. 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:
  - a. 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.
  - b. Records shall be kept for a period of 3 years, unless otherwise stated.
  - c. Records shall be kept on-site for a minimum of 12 months. Records kept off-site, must be made available within 7 days of any request by the regulator.
7. All documentation required to be submitted to the regulator to demonstrate compliance with relevant conditions, shall be submitted in an electronic format. Submissions shall be sent to: [public.protection@telford.gov.uk](mailto:public.protection@telford.gov.uk)
8. Only the plant and equipment listed in Table 2 and detailed in the site maps of Appendix 2 shall be used for the permitted activities.

<b>Table 2 Permitted plant and equipment</b>	
<b>Plant and equipment</b>	<b>Emission points</b>
<b>C8 area</b>	
Asset no: 105371 Binks Carousel water abatement paint spray booth	Stack numbers 1P, 2P, 3P and 5P
Asset no: 305258 STL Spray Mater paint spray booth	Stack number 4P
Asset no: 104308 Blast media booth D Bay South	External bag filter tower connected to 1C
Asset no: 147565 Wheelabrater shot blast	Internal bag filter with clean air extraction through 2C
Asset no: 104412 Metal spray booth LEV 151165	External bag filter tower connected to 3C & 4C
Asset no: 151153 Vacuum extraction	5C – currently in use
Asset no: 203261 Blast cabinet & Numatic 259007	Internal bag filter with clean air extraction through 6C
Asset no: 247367 Sealy blast cabinet	Internal bag filter with clean air extraction through 7C
Asset no: 259850 Nederman welding extraction	8C
Asset no: 258421 Nederman welding extraction	8C
Asset no: 042928 Water recovery separation filter	9C
Asset no: 170155 Nederman Welding extraction	1W
Asset no: 305313 Welding extraction	2W
Asset no: 094157 Welding extraction	3W
Asset no: 094161 Welding extraction	4W
Asset no: 229342 Rosler shot blast	Enclosed with internal abatement
Asset no: 259857 Rosler shot blast	Enclosed with internal abatement
Asset no: 162092 Ventus Vacu-blast shot blast	Enclosed with internal abatement
Asset no: 187987 Blast cabinet	Enclosed with internal abatement
Asset no: 259907 Sealy blast cabinet & Numatic Vacuum AA 259414	Enclosed with internal abatement
<b>C20 area</b>	
Asset no: 258412 Sealy shotblast cabinet	Enclosed with internal abatement
Asset no: 258441 Hednair drying oven	Wall mounted extraction fan



<b>Table 2 Permitted plant and equipment continued</b>	
<b>Plant and equipment</b>	<b>Emission points</b>
<b>C23 area</b>	
Asset no: 166755 Crompton bench extraction welding	Stack number 17P
Asset no: 166756 Crompton bench extraction welding	Stack number 11P
Asset no: 258272 Fibre glass extraction	Stack numbers
Asset no: 258273 Fibre glass extraction	Stack numbers 19P
Asset no: 258237 Shot blast cabinet & Numatic Vacuum AA.287398	Enclosed with internal abatement
Asset no: 306677 Clarke shot blast cabinet SB30	Enclosed with internal abatement
<b>C35 area</b>	
Asset no: 105366 Hepworth Powder coater	External bag filter tower connected to stack number 20P
Asset no: 105366 Hepworth Powder coater	Stack number 12P
Asset no: 005326 Stoving oven	Stack number 13P
Asset no: 005323 Mixing table	Stack number 17P
Asset no: 005323 Water backed paint spray booth	Stack number 14P
Gun cleaner	Stack number 19P – non VOC emissions
Asset no: 173291 Turbex wash tank	10C
Asset number 005317 Phosphating drying oven	11C
Asset no: 148570 Vaqua manual shot blast	12C
Asset no: 146695 Phosphating tank clean water	13C
Asset no: 14996 Phosphating tank zinc phosphate	
Asset no: 146697 Phosphating tank clean water	
Asset no: 005313 OMSG automated shot tumble clean	14C
Asset no: 005314 OMSG automated shot tumble clean	
Asset no: 166766 Welding	5W
Asset no: 307390 Welding	
Asset no: 151179 Concord preserving oil bath	15C – Currently not in use
degreaser	21C– steam only
Aquablast water and sand grit shot blaster	23C
Asset no: 011247 Guyson shot blast cabinet	Enclosed with internal abatement
Asset no: 005312 Guyson shot blast cabinet	Enclosed with internal abatement
<b>C43 area</b>	
Asset no: 151090 Spray Bake 2 booth in 1 paint spray booth – LEV AA151158	Stack numbers, 5P, 6P, 7P and 8P
<b>C90 area</b>	
Asset no: 307641- Main System AA151091 Oscott air paint spraybooth LEV AA151159	Stack numbers 9P and 10P



### Emission Limits

9. No visible particulate matter shall be emitted beyond the installation boundary.
10. Emissions from the activities within the installation at the emission points listed in Table 2, shall not exceed the emission limits in Table 3.
11. The Operator shall carry out the monitoring requirements in Table 3 to demonstrate compliance with emission limits stated, at the frequency stated in said Table.

<b>Table 3 – Emission Limits and monitoring requirements</b>		
<b>Substance</b>	<b>Emission Limit</b>	<b>Monitoring requirements and frequency</b>
Particulate matter from emission points: 1P, 2P, 3P, 4P, 5P, 6P, 7P, 8P, 9P, 10P, 12P, 13P, 14P, 1C, 2C, 3C, 4C, 6C, 7C, 11C, 12C, 14C & 23C	50mg/Nm <sup>3</sup> as 30-minute mean for contained sources	Annual manual extractive testing
Particulate matter from emission point stack 20P for the powder coating activity with an airflow greater than 50m <sup>3</sup> /min	10 mg/m <sup>3</sup>	Annual manual extractive testing
Particulate matter – all processes	No visible emissions	Daily recorded visual assessments
Isocyanates From emission point stacks for the paint spraybooths emission points: 1P, 2P, 3P, 4P, 5P, 6P, 7P, 8P 9P, 10P and 14P	0.1 mg/Nm <sup>3</sup> as 30 minute mean for contained sources excluding particulate and expressed as NCO.	Annual manual extractive testing
Materials with the designated hazard statements H340, H350, H350i, H360d or H360F with a mass flow equal or more than 10g/hr from the paint spraybooths emission points 1P, 2P, 3P, 4P, 5P, 6P, 7P, 8P 9P, 10P and 14P	2mg/Nm <sup>3</sup>	Annual manual extractive testing
Materials with the designated hazard statements H341 or H351 with a mass flow equal or more than 100g/hr from the paint spraybooths emission points 1P, 2P, 3P, 4P, 5P, 6P, 7P, 8P 9P, 10P and 14P	20mg/m <sup>3</sup>	Annual manual extractive testing



### **Monitoring provisions**

12. All external dry bag filter units shall be fitted with a continual monitor to indicate the performance of the abatement plant, by using equipment such as a pressure drop indicator.
13. Where continuous monitors have been fitted with a visual and/ or audible alarm warning of abatement failure or malfunction. Where an alarm test has been fitted, they shall be serviced and calibrated twice a year and a daily visual assessment completed. Records shall be made available for inspection.
14. Any monitoring display required for compliance with the permit shall be visible to operating staff at all times. Corrective action shall be taken immediately if there is a malfunction or breakdown of any equipment which might increase emissions.
15. All activations of the continual alarm shall be recorded.
16. The introduction of dilution air to achieve emission concentration limits shall not be permitted.
17. In order to maintain adequate dispersion of emissions, the exit velocity shall be 15m/s from all stacks listed in table 2, with the exception of the wet abatement stacks (1P, 2P, 3P, 5P and 14P), where the maximum exit velocity shall be 9m/s.
18. 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.
19. The results of non-continuous emission testing shall be forwarded to the regulator within 8 weeks of completion of the sampling.
20. Adverse results from any monitoring activity (both continuous and non-continuous) shall be investigated by the operator as soon as the monitoring data has been obtained. The operator shall:
  - a. identify the cause and take corrective action;
  - b. clearly record as much detail as possible regarding the cause and extent of the problem, and the remedial action taken;
  - c. re-test to demonstrate compliance as soon as possible; and inform the regulator of the steps taken and the re-test results.

### **Solvent Reduction Scheme**

21. The operator shall comply with the reduction scheme by demonstrating annual actual emissions are less than or equal to the annual target emission.



22. The annual actual emission shall be calculated by using the following calculation:
- a.  $I_1 - O_6 - O_7 - O_8 = \text{Actual emission (in Kg)}$ .
23. The annual target emission shall be calculated by using the following calculation:
- a. Where the annual consumption of solvent is below 15 tonnes, the annual total mass of solids used x 0.6 = Target emission (in Kg).
- b. Where the annual solvent consumption is above 15 tonnes, the annual total mass of solids used x 0.37 = Target emission (in Kg).
24. The operator shall use the agreed solvent management calculator as a method for demonstrating compliance with the solvent reduction scheme. This shall be submitted no later than 30 April of each year.

#### **Solvent Management Plan**

25. The definitions in Appendix 3 shall be utilised in complying with the conditions of this section and the solvent reduction scheme section of the permit.
26. The operator shall submit a solvent management plan demonstrating the requirements in Conditions 21, 22, 23, 24, 28, 29, 33 and 34 inclusive, no later than 30 April of each year.
27. The operator shall make available upon request, detailed stock and usage records demonstrating the amount of solvent purchased and used within the installation during the reporting year.
28. Determination of the solvent consumption shall be demonstrated using the following equation:
- a.  $I_1 - O_8 = \text{solvent consumption (in Kg)}$ .
29. The Operator shall include a solvent management plan which includes:
- a. Mechanisms to decrease the average solvent content of the total input, and/or
- b. Systems to increase efficiency in the use of solids to achieve a reduction of the total emissions of the installation.
30. A programme to monitor and record the consumption of organic solvent against product produced shall be used to minimise the amount of excess organic solvent used.



### **Designated materials**

- 31.** Materials with the designated hazard statements H340, H350, H350i, H360d or H360F:
- Shall be replaced within the shortest possible time with less harmful substances.
  - Shall be controlled under contained conditions as far as technically and economically feasible to safeguard public health and the environment.
  - Where the sums of the mass flows of all the discharges of all the compounds causing the designated labelling is greater or equal to 10g/hr, the emission limit in Table 3 shall apply.
- 32.** Materials with the designated hazard statements H341 or H351:
- Shall be controlled under contained conditions as far as technically and economically feasible to safeguard public health and the environment.
  - Where the sums of the mass flows of all the discharges of all the compounds causing the designated labelling is greater or equal to 100g/hr, the emission limit in Table 3 shall apply.
- 33.** Within 4 weeks of the issue of this permit, the operator shall carry out an audit of all materials containing VOCs to determine whether they carry any of the hazard statement listed in conditions 31 and 32. The recorded results of the audit shall be kept for inspection by the regulator. The audit shall be updated where a change in materials occurs.
- 34.** 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.
- A short summary of the conclusions of each assessment shall be included in the solvent management plan.

### **Operational Controls**

- 35.** The number of start-ups and shut downs shall be kept to the minimum that is reasonably practicable.
- 36.** All VOC coating activities shall only be carried out in the spraybooths listed in Table 2.
- 37.** All materials containing solvents, including raw materials, mixed materials and waste materials, shall be stored in closed containers on bunding that has:
- An impervious surface resistant to the liquids in storage, and is
  - Capable of holding 110% of the materials stored upon it.



- 38.** Application of cleaning solvents shall be:
- From a contained automatic system for spray guns and ancillary equipment.
  - Dispensed by piston type dispenser or similar contained device, when used on wipes.
- 39.** Residual coating contained in parts of the application equipment shall be removed prior to cleaning.
- 40.** Programmable scales shall be used during the mixing and preparation of coatings to reduce organic solvent usage.
- 41.** Prior to disposal, empty drums and containers contaminated with organic solvent shall be closed to minimise emissions from residues during storage prior to disposal and labelled, so that all personnel who handle them are aware of their contents and hazardous properties.
- 42.** Nominally empty drums with VOC awaiting disposal shall be stored in accordance with the requirements for full or new containers.
- 43.** Prior to disposal used wipes and other items contaminated with organic solvent shall be placed in a suitably labelled metal bin fitted with a self-closing lid.
- 44.** Powder coating activities shall only be carried out in the powder booth bay specified in Table 2.
- 45.** Odour emissions from the powder coating activity shall be minimised by:
- Controlling oven temperatures
  - Not using curing ovens to clean jigs.
- 46.** The preparation of metal shall only be carried out within the shot blast units specified in Table 2, with the extraction in full operation.
- 47.** The removal of dusty materials from the shot blast units and the extraction units shall be carried out in such a manner as to prevent dusty emissions.
- 48.** Dusty raw materials shall only be stored in the designated area within the installation building and dusty wastes shall only be stored in covered waste containers. Their storage and transfer shall be subject to suppression and management techniques to minimise dust emissions. No potentially dusty materials (including wastes) or finished products shall leave the site other than by use of covered vehicles.
- 49.** Dry sweeping of dusty materials shall not normally be permitted unless there are environmental or health and safety risks in using alternative techniques.
- 50.** Suitable organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas.



51. A high standard of housekeeping shall be maintained.

#### **Abnormal Events**

52. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the operator shall:

- a. investigate and undertake remedial action immediately;
- b. adjust the process or activity to minimise those emissions; and
- c. promptly record the events and actions taken.

53. The regulator shall be informed without delay:

- a. if there is an emission that is likely to have an effect on the local community; and/or
- b. in the event of the failure of the abatement plant listed in Table 2.

54. In cases of non-compliance causing immediate danger to human health, or threatening to cause an immediate significant adverse effect upon the environment, operation of the activity must be suspended and the regulator informed immediately. All of following criteria shall be taken into account and reported to the regulator:

- a. the toxicity of the substances being released;
- b. the amount released;
- c. the location of the installation; and
- d. the sensitivity of the receptors.

#### **Maintenance**

55. All plant and equipment capable of causing, or preventing, emissions and all monitoring devices shall be calibrated and maintained in accordance with the manufacturer's instructions. Records shall be kept of such maintenance.

56. Flues and ductwork shall be cleaned to prevent accumulation of materials, as part of the routine maintenance programme.

57. Filters within the external filtration plant shall be visual inspected at least once a month, as part of the routine maintenance programme.

58. The operator shall have the following available for inspection by the regulator:

- a. a written maintenance programme for all pollution control equipment; and
- b. a record of maintenance that has been undertaken.



### **Training**

**59.** All staff whose functions could impact on air emissions from the activity shall receive appropriate training on those functions. This shall include:

- a. awareness of their responsibilities under the permit;
- b. steps that are necessary to minimise emissions during start-up and shutdown;
- c. actions to take when there are abnormal conditions, or accidents or spillages that could, if not controlled, result in emissions.

**60.** The operator shall maintain a statement of training requirements for each post with the above mentioned functions and keep a record of the training received by each person. These documents shall be made available to the regulator on request.



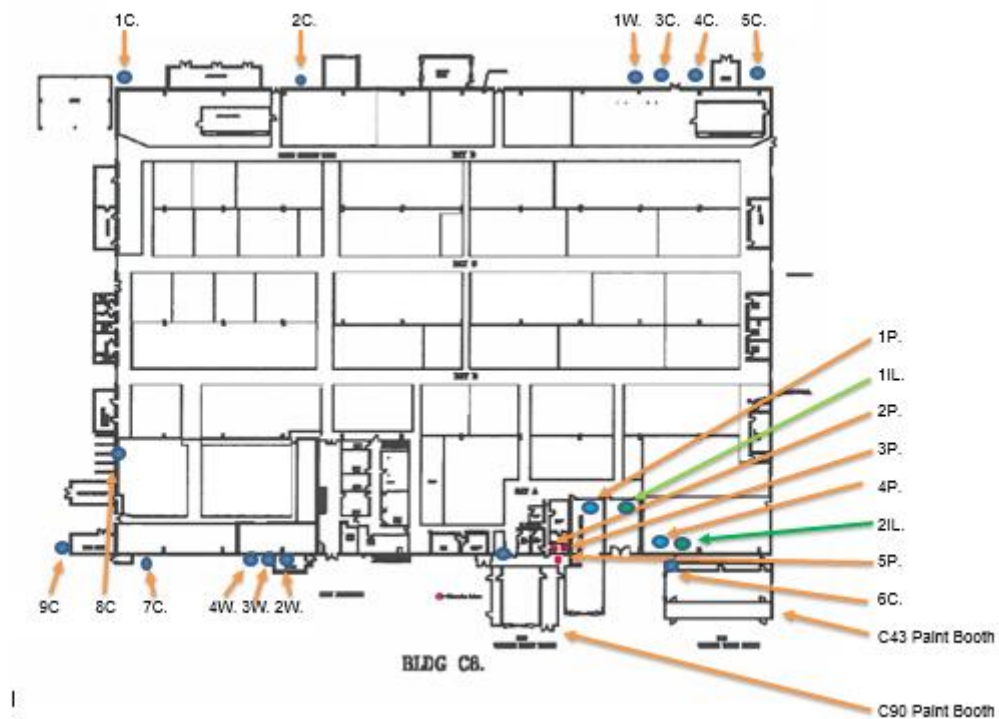
## Appendix 1. Location of Installation Plan



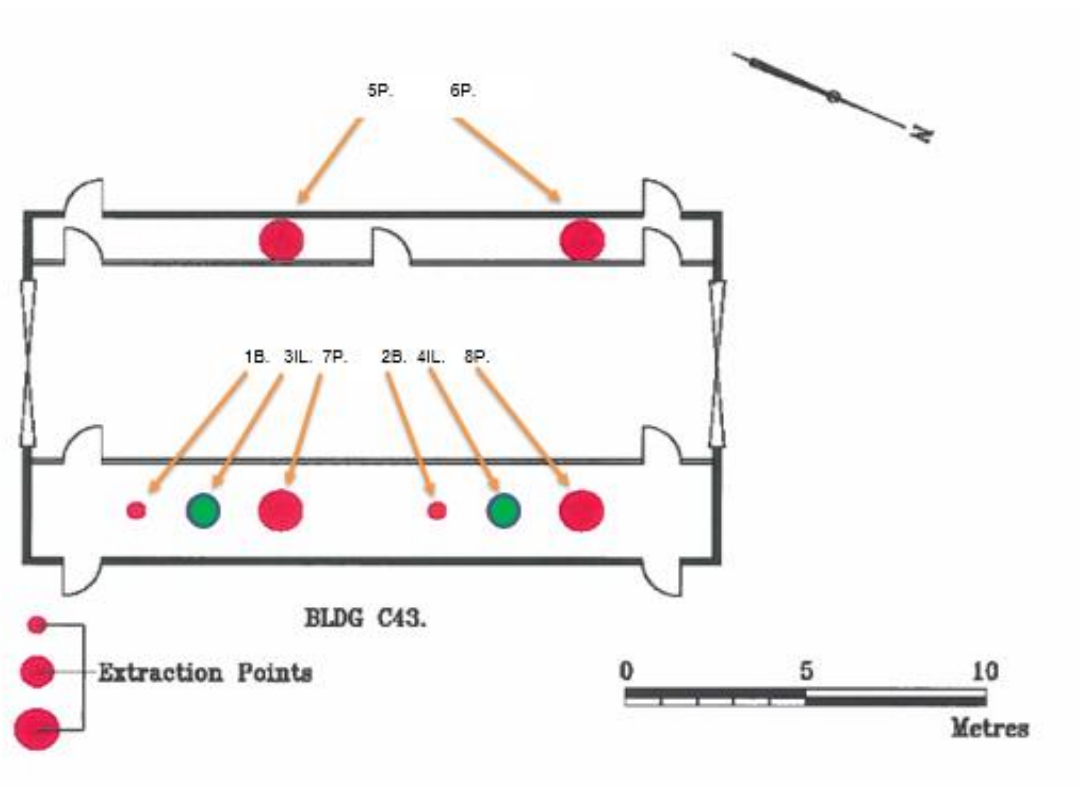


## Appendix 2. Site maps and emission points

### C8 – point source emissions



### C43 – Point Source emissions



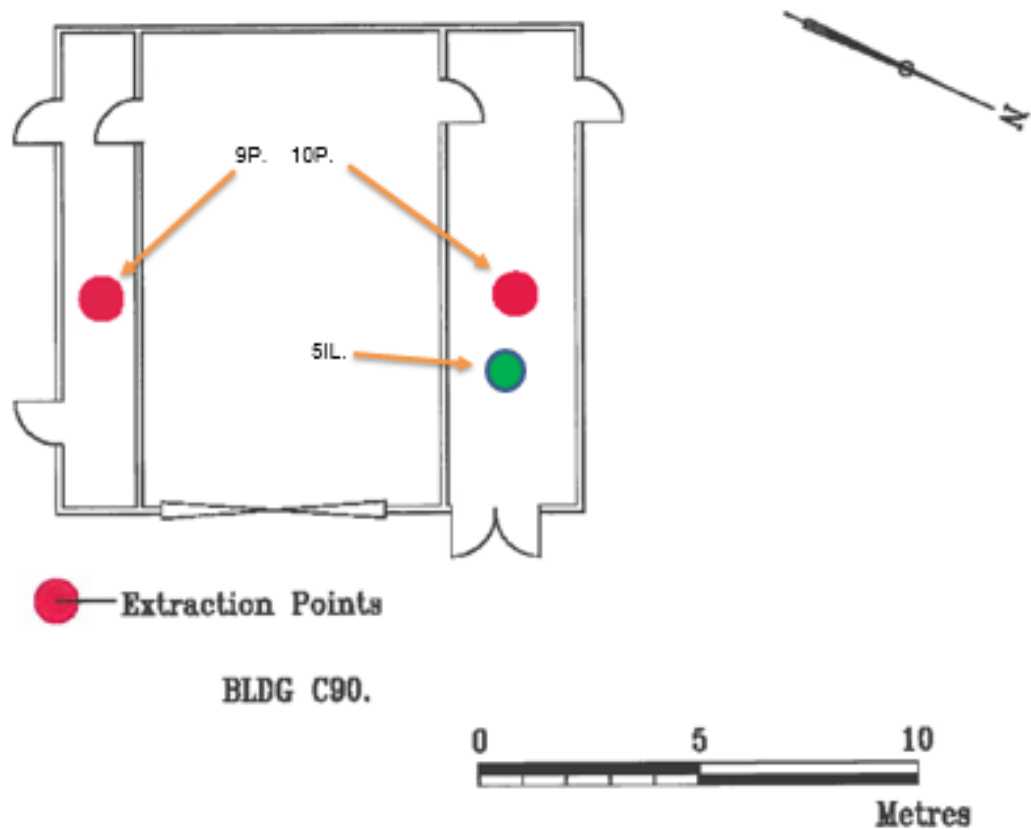
### C90 – Point source emissions



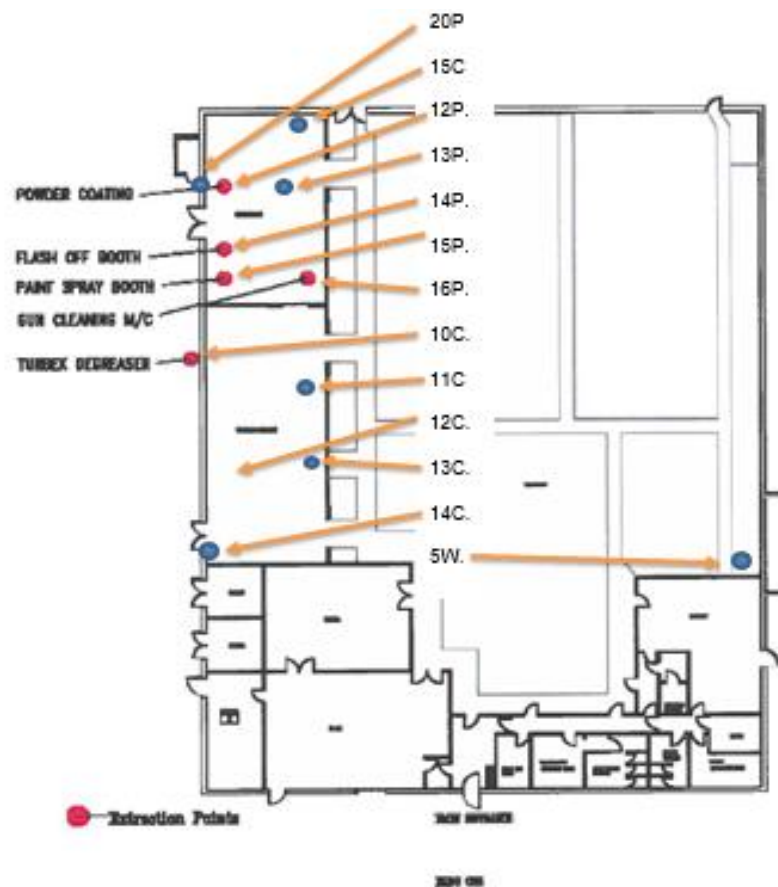
**Telford & Wrekin**  
C O U N C I L

Pollution Prevention Control Act 1999

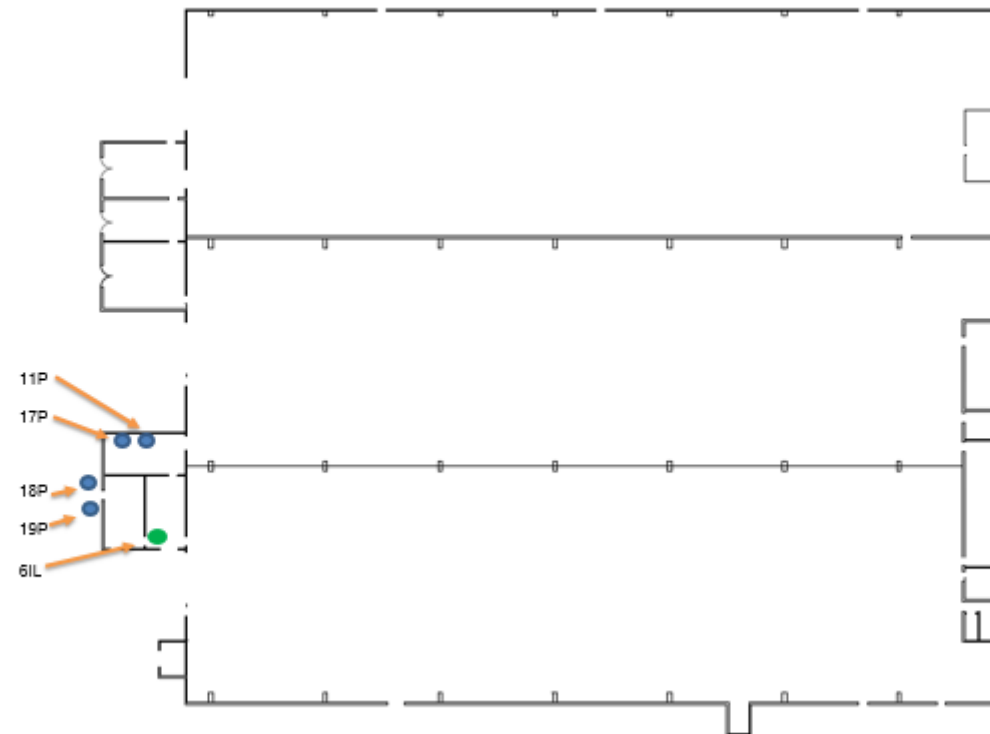
Environmental Permitting (England and  
Wales) Regulations 2016



C35 – Point source emissions



## C23 – Fiberglass & Padding



## Storage areas – fugitive emissions

Storage areas listed below



**1. C37 Waste Compound**

Bunded storage for any items awaiting disposal

**2. C34 I&RM Paint Store**

Site main paint store

**3. C8 Paint Store**

Local stockholding to meet planned vehicle and component paint requirement

**4. C35 Paint Store**

Local stockholding to meet planned weapon and component paint requirement

## Appendix 3 – Explanatory Notes

### 1. In determining the total mass of solids:

- a. all ingredients other than water and organic solvents should be assumed to form part of the solid coating; **and**
- b. solids are all materials in coatings that become solid as a result of curing, polymerisation, or the evaporation of the water or solvent (usually available from the supplier in g/l or non-volatile % mass by weight).

In cases of doubt, the reference standard for the determination of non-volatile % mass by weight is BS EN ISO 3251 (also numbered BS 3900: B18). The test conditions may need to be adjusted for the particular conditions of use or when assessing chemically or radiation cured coatings, where otherwise volatile components react to form part of the dry solid coating.

### 2. The following definitions shall be applied:

**I<sub>1</sub>** 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).

**I<sub>2</sub>** 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.)

**O<sub>1</sub>** Emissions in waste gases.

**O<sub>2</sub>** Organic solvents lost in water, if appropriate taking into account waste water treatment when calculating O<sub>5</sub>.

**O<sub>3</sub>** The quantity of organic solvents which remains as contamination or residue in products output from the process/activity.

**O<sub>4</sub>** 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.

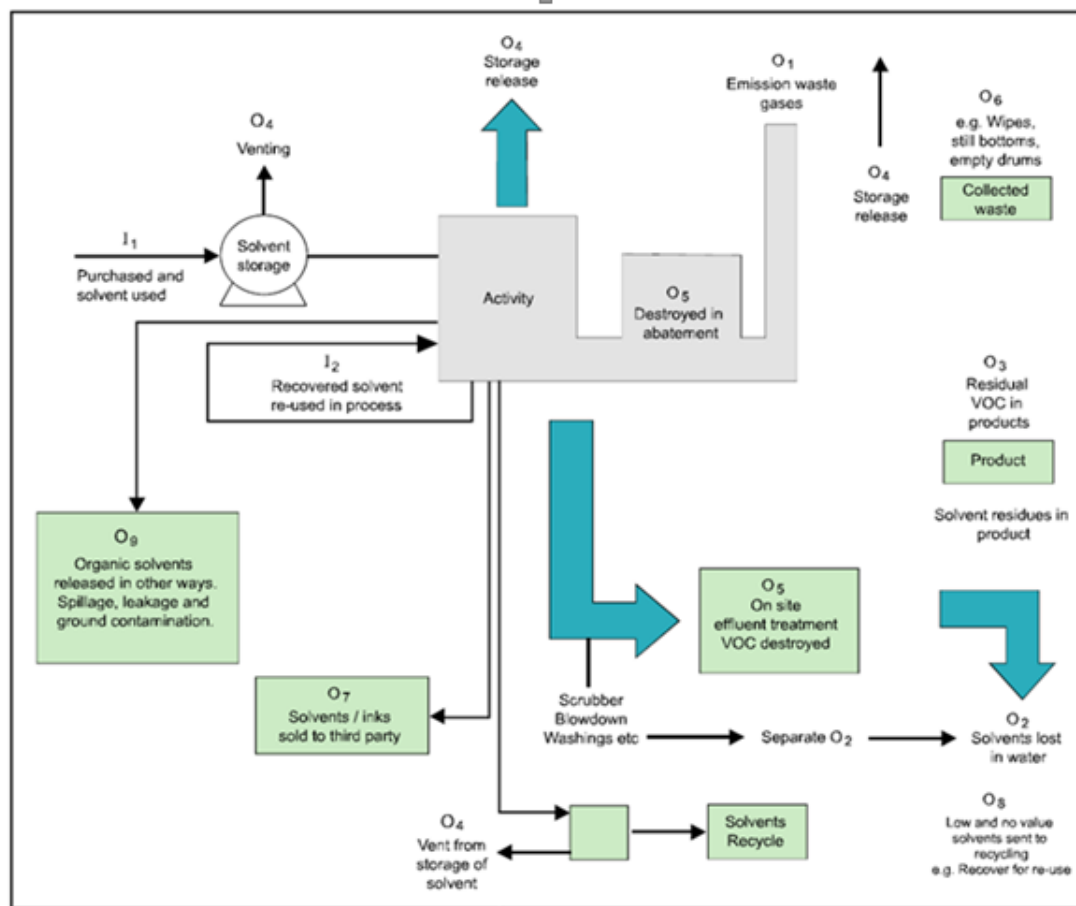
**O<sub>5</sub>** Organic solvents and/or organic compounds lost due to chemical or physical reactions (including for example those which are destroyed, e.g. by thermal oxidation or other waste gas or waste water treatments, or captured, e.g. by adsorption, as long as they are not counted under O<sub>6</sub>, O<sub>7</sub> or O<sub>8</sub>).

**O<sub>6</sub>** Organic solvents contained in collected waste.

**O<sub>7</sub>** Organic solvents, or organic solvents contained in mixtures, which are sold or are intended to be sold as a commercially valuable product.

**O<sub>8</sub>** Organic solvents contained in mixtures recovered for reuse but not as input into the process/activity, as long as not counted under O<sub>7</sub>.

**O<sub>9</sub>** Organic solvents released in other ways.



**End of Permit Conditions**



**This section does not form 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. Inspection will be carried out in accordance with a risk assessment, and/or following from any complaints or applications.

### **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 should be given to the items listed in Annex IV of the Directive.

### **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, it may apply to the council to have such information withheld from the register as provided in the Regulations.

### **Health and Safety at Work and Other Statutory Requirements**

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



### **Notification of Changes to the activity or Operator**

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**

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**

Where the operator intends to cease the operation of an installation (in whole or in part). In the case of Part B Permits, the operator must notify the Council on the appropriate form in accordance with Regulation 24. 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.

### **Risk Rating**

Procedures and records shall be examined during inspections and will be referred to during the Department of Food and Rural Affairs (DEFRA) risk rating, carried out to determine the risk category: LOW, MEDIUM or HIGH which will determine the annual subsistence fee and the inspection frequency of the regulator.

### **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.

<http://www.telford.gov.uk/NR/rdonlyres/240C3F4A-8E36-4C12-8311-E4E57A3DF8CC/26214/MicrosoftWordEnvironmentalHealthandWellbeingEnforc.pdf>

### **Annual Subsistence Charge**

An annual subsistence fee is payable in order to operate your installation. An invoice will be issued annually by the regulator which will include details of how to pay. The charges are based on the DEFRA risk rating. Details of the risk assessment can be found at <http://www.defra.gov.uk/environment/ppc/localauth/fees-risk/risk.htm>.

You are reminded that failure to pay the subsistence fee may result on the Permit being revoked. It is an offence to operate a regulated facility without a permit and upon summary conviction liable to a maximum fine of £50,000 and/or imprisonment.

### **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 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/environment/environmental\\_appeals/environmental\\_permitting\\_appeal\\_form.pdf](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](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 Public Protection Team of Telford & Wrekin Council. They can be contacted on 01925 381 818. You may also contact them by email at any time. [public.protection@telford.gov.uk](mailto:public.protection@telford.gov.uk)

**Correspondence Address**

All correspondence to Telford & Wrekin Council relating to this information shall be addressed to: Customer and Neighbourhood services, Public Protection, Telford and Wrekin Council, Addenbrooke House, Telford, TF3 4NT