



Telford & Wrekin
C O U N C I L

Pollution Prevention Control Act 1999

Environmental Permitting (England & Wales) Regulations 2016 as amended

Operator	Aalberts Surface Technologies Heat Ltd
Installation Address	Hortonwood 40 Telford Shropshire TF1 7YU
Grid Reference	SJ 684 137
Permit Reference	166/230622
Registered Office	Aalberts Surface Technologies Heat Ltd 629 Blackhorse Road Letchworth Garden City Hertfordshire SG6 1HD
Company Number	00884462

Aalberts Surface Technologies Heat Ltd is hereby permitted by Telford & Wrekin Council to carry on a solvent degreasing activity under Schedule 14 the Environmental Permitting (England & Wales) Regulations 2016 (as amended), and other activities as listed and described below within the installation boundary marked red on the attached site plan referenced Appendix 1 and in accordance with the conditions detailed in section 2 of this Permit.

Signed:

Name: Clair Travis

Date: 23 June 2022

Environmental Health Consultant

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

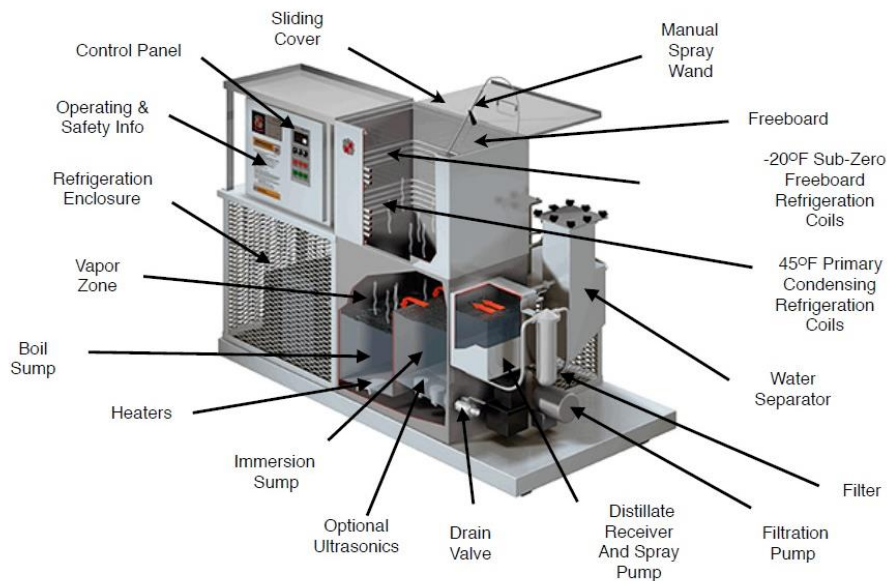


Provenance	Relevant Dates
Date Application Made (Deemed application)	08/11/06
Date 'Duly Made'	15/11/06
Date Permit First Issued	15/7/09
Date of Variations	N/A
Date of Permit Review	10/03/2016
Name change from Hauck Heat Treatment Ltd, change of company address and new permit reference given	23/06/2022

Description of Activity

The installation treats metal components for customers by a process called Nitriding. Gas Nitride treatment is a "low temperature" furnace treatment with an atmosphere of Ammonia whereby nitrogen diffuses into the surface of the metal being treated. The nitriding process is an established and successful means of generating a hard case on a component and is used for components such as cam shafts, gear components, machine tools and specialist aerospace equipment.

Metal components, are cleaned in a hermetically sealed vapour degreasing unit using Perchloroethylene (PERC). Solvent degreasing involves the exposure of the metal component to pure solvent vapours released by the boiling solvent. The component is usually suspended in the vapours just above the boiling solvent. When the warm vapours touch the comparatively cool component, a condensing action occurs which dissolves the contamination and flushes it away as it runs off the part. This cleaning action will continue until the component and the solvent vapour are the same temperature. The components are placed in baskets and introduced into the unit by hoist. The trichloroethylene is introduced into the hermetically sealed unit via a fully integrated sealed delivery system.



Heat Treatment - Nitriding activities

After cleaning components are then subjected to varying heat treatment (nitriding) processes dependent on the requirements of customers. Metal components may be subjected to any or multiples of the following:

Gaseous Nitriding
Nitreg Nitriding
Plasma Nitriding

The Nitriding process is not prescribed under the EPR Regulations for control. Emissions from the Nitriding process are minimal as all heat treatment is completed in sealed vacuum furnaces with no direct emission to atmosphere.

Gas Nitriding

The gas nitriding process is carried out in a sealed retort furnace at temperatures between 490°C and 510°C in a flowing ammonia atmosphere in cycles of varying duration. Gaseous Anhydrous ammonia is introduced into retort furnaces in via a fully sealed delivery system. Residual gas from the nitriding process is purged through a water trap and the cleaned air discharged to atmosphere.

Plasma Nitriding



In plasma nitriding, the reactivity of the nitriding media is not due to the temperature but to the gas ionized state. In this technique intense electric fields are used to generate ionized molecules of the gas around the surface to be nitrided. The gas used for plasma nitriding is usually pure nitrogen, since no spontaneous decomposition is needed (as is the case of gas nitriding with ammonia).

Location of the Installation.

The Installation is located within a site that is a part of a large Industrial Estate where other Permitted activities operate. There are no sensitive receptors within 100m of the Installation.

Emission to Atmosphere

There are no direct emissions to atmosphere from the surface cleaning operations or nitriding processes. There are minor ventilation points which discharge to atmosphere from the curing ovens.

Varying of monitoring requirements

This installation is totally enclosed and has no point source emissions to atmosphere. Therefore the requirement for stack emission monitoring has been removed.

Statutory Guidance

The conditions contained within this Permit are based upon Guidance Note PG 6/45 (11), Statutory Guidance "Surface cleaning" (Revised June 2014)



Permit Conditions

1.0 Overarching Management Conditions

- 1.1 Without prejudice to the other conditions of this Permit, the Operator shall implement and maintain a management system, organisational structure and allocate resources that are sufficient to achieve compliance with the limits and conditions of this Permit.
- 1.2 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.

2.0 Emission limits and Controls

- 2.1 Emissions from all surface cleaning operations and equipment shall be contained and re-circulating and have no direct emission to atmosphere.
- 2.2 All vapour degreasing units used at the installation shall be hermetically sealed type units. No open degreasing tanks shall be used at the installation.
- 2.3 All doors to the vapour degreasing units shall be interlocked such that the machine cannot be operated unless the door is fully closed and sealed.
- 2.4 The basket configuration shall be designed to enhance the cleaning efficiency whilst at the same time minimising the potential for retention of organic solvent/ vapours within each load cleaned.
- 2.5 The programming and loading of components into vapour degreasing machines shall be controlled, monitored and reviewed to ensure that the number of surface cleaning operations is minimised by ensuring that the basket is loaded to its maximum capacity whilst ensuring that the orientation and packing of the components is optimised to reduce possible retention and drag out of organic solvent.
- 2.6 An energy control system shall be fitted to sense the vapour condition and control heat input to meet the requirements of the degreasing process and minimise emissions during non-process periods.
- 2.7 Where practicable cooling coils shall be fitted to a self-contained closed loop chiller unit, which will reduce energy costs and ensure maximum efficiency in organic solvent vapour containment.
- 2.8 When charging the degreasing unit and when pumping out waste, totally contained emission free transfer systems shall be used. Charging of the bath can be by pump or gravity fed methods. The point at which organic solvent



discharges into the degreasing plant shall be where practicable below the liquid level in the sump. If the discharge point is above the liquid level, the plant must be cool before introducing organic solvent. Condensing and ventilation systems must be in operation when transferring organic solvent.

- 2.9 Dispensing of waste cleaning solvents from the machine shall be by fully enclosed pump system to enclosed containers.
- 2.10 The Operator shall construct an inventory of solvent use within the installation. The inventory shall record:
- (i) The mass of solvent contained in coatings, diluents and cleaners in the initial stock (**Is**) at the start of the accounting period plus
 - (ii) The mass of solvent contained in coatings, diluents and cleaners in the purchased stock (**Ps**) during the accounting period
 - (iii) Minus the mass of solvent contained in coatings, diluents and cleaners in the final stock (**Fs**) at the end of the accounting period.

Then the Total Solvent Input:

$$I_1 = Is + Ps - Fs$$

The inventory shall specifically and separately identify any VOCs carrying any of the R-phrases as prescribed within the Solvent Emissions Directive. from the Input figures any solvent that is sent out for recovery:
Hence:

$$C(\text{consumption}) = I_1 - O_8$$

The inventory and consumption data for the previous year shall be available for review by the Regulator at the following year's inspection.

- 2.11 There shall be no offensive odour emitted from the installation detected beyond the installation boundary as perceived by the regulator
- 2.12 The solvent degreasing unit and all associated pipework, taps and valves, interlocks, sampling points and safety devices shall be inspected periodically for leaks. Any leaks found shall be promptly stopped. A record of the inspection and any work resulting shall be entered in the log maintenance records section.



3.0 Solvent Emissions Directive

- 3.1 For substances used carrying risk phrases R45, R46, R49, R60 or R61, the Operator shall specifically identify the use for each of these chemicals and carry out an assessment as to where each can be replaced with a non-risk phrase chemical and the date by which that replacement can be achieved. All documentation relevant to the substitution shall be submitted to the Regulator.

The formal assessment shall be repeated every 4 years from the date of issue of this permit.

4.0 Materials Handling

- 4.1 All solvents used in the installation and all waste materials produced from the activities therein shall be handled with care to prevent or minimise emissions to air. Containers of solvent shall be kept covered and any contaminated wipes shall be disposed of in sealed bags. All containers shall be kept in/or a bunded area or tray.

- 4.2 Solvent degreasing operations shall be carried out using only materials which are placed on the market for use in solvent degreasing:

Note 1: Such materials will be identified by a label on each container containing the following information:

- (i) a clear description of the product by identification of the contents by name or synonym
- (ii) Reference to the associated risk phrases and human health hazards
- (iii) Reference to handling, storage and environmental impact in the event of unplanned escape or release to a sensitive receptor.

- 4.3 Any spillage of liquid and powder shall be removed immediately after its occurrence. Liquid spillages shall be contained and removed using a suitable absorbent material.

5.0 General Operations

- 5.1 The operator shall undertake regular cleaning and preventative maintenance including inspection and repair/replacement on all plant and equipment concerned with the emission, capture, transport and control of emissions to atmosphere. Manufacturer's guidelines shall be used to determine the frequency of inspection and maintenance schedule. Records of preventative maintenance including inspections and any works undertaken shall be kept on site and made available to the local authority inspector on request.

- 5.2 Spares and consumables for plant and equipment used in the installation in particular that subject to continual use or wear shall be held on site or shall be available at short notice. Such plant or equipment shall not be used unless that



plant or equipment is capable of working in accordance with the conditions of this permit.

- 5.3 Staff at all levels shall receive the necessary training and instruction in their duties relating to control of the activities and emissions to air. Records shall be kept which details all relevant training provided to staff, and these records shall be kept for a minimum of 2 years.
- 5.4 Any incident likely to give rise to adverse atmospheric emissions or emissions that may have an impact on the local community shall be notified to the local authority regulator immediately, and the details of incident including remedial action taken recorded in a process log book.
- 5.5 In cases of non-compliance causing immediate danger to human health, operation of the activity shall be suspended. All of the following criteria shall be taken into account:
- The toxicity and amount of the substances being released
 - The location of the installation; and
 - The sensitivity of the receptors

Should the incident have a potential impact on the local the local authority regulator shall be notified immediately.

- 5.6 Complete and immediate access to the premises shall be granted to a duly authorised officer of the Local Authority upon request.
- 5.7 If there is any intention to change any aspect of the prescribed installation from the description contained in the beginning of this permit, or any other aspect which may affect the substances or concentration or amount of substances being emitted to atmosphere, the operator shall notify the regulator of the proposed changes at least 4 weeks in advance before the changes take place.
- 5.8 A high standard of housekeeping shall be maintained.
- 5.9 The process shall operate and adhere to the provisions of an appropriate Environmental Management System or environmental control policy.
- 5.10 A copy of this Permit shall be kept on the premises.

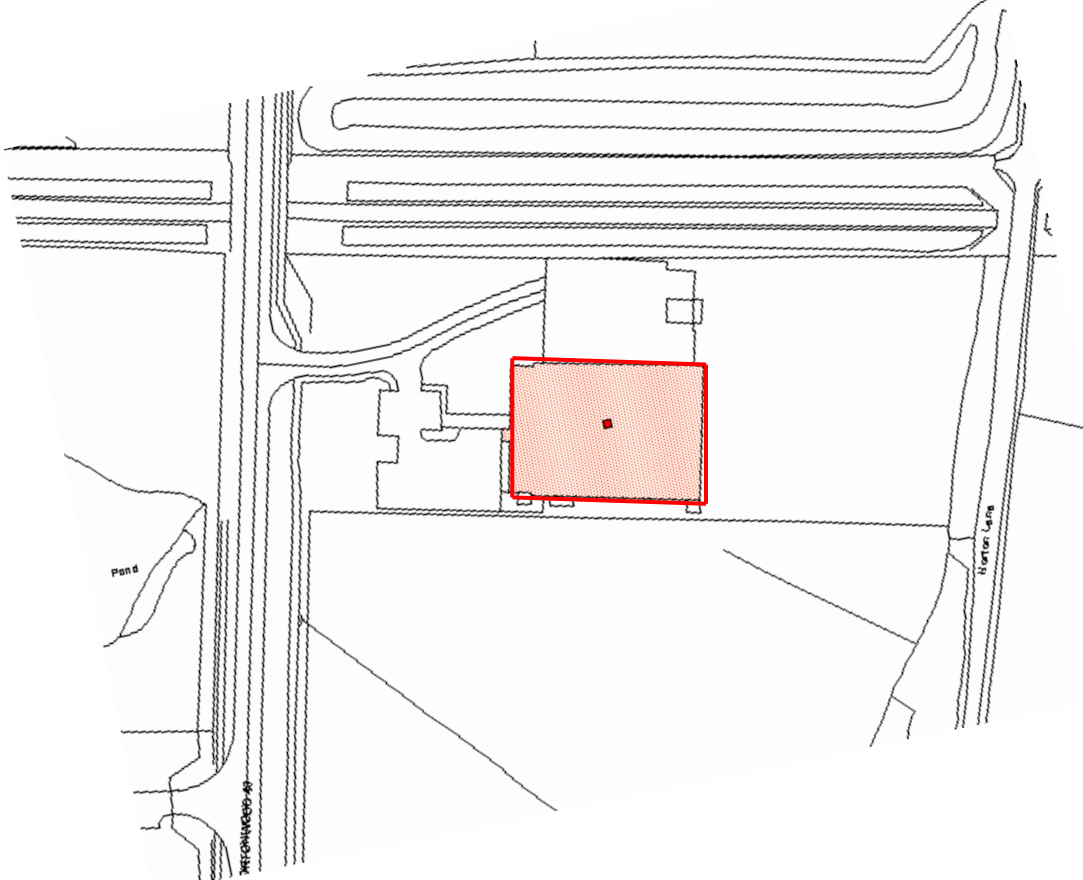
Appendix 1: Location Plan and installation Boundary (Highlighted in red)



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EXPLANATORY NOTE

These notes are provided for the operator of an installation or mobile plant to assist in the interpretation of their duties under the provisions of the above-mentioned legislation, with particular reference to the permit issued by Telford & Wrekin Council. These notes do not form part of the Permit or conditions attached to it.

1. RESIDUAL BAT CONDITION (BEST AVAILABLE TECHNIQUES)

You should note that a fundamental principle of the LAPPC regime is the application controlling pollution by using “Best Available Techniques”. The BAT approach requires that the cost of applying techniques is not excessive in relation to the environmental protection they provide.

Article 2(11) of the IPPC Directive defines – Best Available Techniques as:-

‘Best available techniques’ shall mean the most effective and advanced stage in the development of activities and their methods of operation which indicate 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 of the environment as a whole.

2. STATUTORY REQUIREMENTS

This Permit is issued under regulation 13 of the EPR Regs and does not detract from any of the following statutory requirements where applicable:-

- (a) The requirement to obtain Planning Permission for the installation and any new construction.
- (b) The requirement to obtain discharge consent from the Environment agency.
- (c) The requirement to obtain Building Regulation approval for any construction work.
- (d) The requirement of a Waste Disposal Licence.
- (e) The requirement to comply with the Health and Safety at Work etc Act 1974



3. PUBLIC REGISTER

The Council is required by regulation 46 to maintain a Public Register containing information on all LAPPC installations and mobile plant. The register is available for inspection by the public free of charge during office hours (Monday to Friday 9.00am to 5.00pm) at

**Telford & Wrekin Council,
Public Protection,
Environment Team,
Darby House,
Telford,
TF3 4JA.**

Subject to exclusions of commercially confidential information and information affecting national security, registers will contain the following:

- a. Applications for a permit;
- b. Notices asking for information and responses to such;
- c. Advertisements and representations in response to such (unless requested not to by the person responding)
- d. In the case of c) above, a statement to the effect that representations were made but have been omitted – must not identify the person making the representation;
- e. Statutory consultee responses to applications or applications for variations;
- f. Permits;
- g. Notifications of changes in the operation of installations;
- h. Applications for variations, transfers or surrenders of permits;
- i. Variations, transfers and surrenders granted;
- j. Revocations;
- k. Enforcement or suspension notices;
- l. Notices withdrawing enforcement and suspension notices;
- m. notice of an appeal including the grounds of the appeal, relevant correspondence between the appellant and the regulator, and the decision/notice which is the subject of the appeal;
- n. Representations in response to appeal (unless requested not to by the person responding);
- o. In the case of n) above, a statement to the effect that representation were made but have been omitted – must not identify the person making the representations;
- p. The appeal decision and any accompanying report;
- q. Convictions, formal cautions; to include the name of the person, date of conviction/caution, and (where appropriate) penalty and name of court. This requirement does not override the Rehabilitation of Offenders Act 1974 regarding spent conditions, and authorities must take care to remove relevant entries at the appropriate time;



- r. Monitoring data obtained by the authority from its own monitoring, or sent to the authority on accordance with a permit condition or regulation 60(2) notice;
- s. If any monitoring information is omitted because it is commercially confidential, the authority must put a statement on the register indicating whether relevant permit conditions are being complied with, based on the withheld information;

Commercial Confidentiality

An operator may request certain information to remain confidential i.e. not be placed on the public register. The operator must request the exclusion from the public register of commercially confidential information at the time of supply of the information requested by this notice or any other notice. The operator should provide clear justification for each item wishing to be kept from the register. The amount of information excluded from the register should be kept to the minimum necessary to safeguard the operator's commercial advantage

The general principle is that information should be freely available to the public. Information that maybe considered commercially confidential is that which if it "were being contained within the register would prejudice to an unreasonable degree the commercial interests of an individual or any other person" (regulation 51(2) of the 2010 Regulations).

Local authorities will also take into account whether the information at issue could be obtained or inferred from other publicly accessible sources.

The local authority will determine this request within 28 days of the date of such an application and will issue a Determination Notice detailing their decision. The notice may specify a time period over which the information is to remain commercially confidential (if not specified, it will be four years beginning with the date of the determination). The operator may appeal to the Secretary of State within 21 days of the notification of the decision.

If the application is granted the local authority will place a statement on the public register stating that certain information has been withheld and stating the reasons why, plus whether this information is relevant to a permit condition, and whether the permit condition has been complied with.

Further guidance on commercial confidentiality can be found in Chapter 8 of the LA-IPPC and LAPPC manual.

National Security

Information may be excluded from the public register on the grounds of National Security (Regulation 47(1)). If it is considered that the inclusion of information on a public register is contrary to the interests of national security, the operator may apply to the Secretary of State, specifying the information and indicating the apparent nature of risk to national security. The operator must inform the local authority of such an application, which will not include the information on the public register until the Secretary of State has decided the matter.



4. FEES

In accordance with regulation 65(1)c of the EPR Regs, the holder of a permit is required to pay a fee for the subsistence of the Permit. This fee is payable annually on 1st April. You are advised that under the provisions of regulation 65(5) of the PPC Regs, if you fail to pay the fee due promptly, the Council may revoke the Permit.

5. Enforcement

The operator will be liable to enforcement action where: -

1. the operator fails to comply with or contravenes any permit condition;
2. a change is made to the installation operation without prior notification of the change to the regulator;
3. intentional false entries are made in any record required to be kept under the conditions of the permit;
4. a 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>

6. TRANSFER OF PERMITS

Under the provisions of regulation 65 of the EPR Regs, where you wish to transfer the Permit to another person (the proposed transferee) then the operator and the proposed transferee shall jointly make an application to the Council. The council will determine the transfer application within 2 months. A fee is also available. For further details on this please contact the Council.

7. SURRENDER OF PERMITS

Under the provisions of regulation 24 of the EPR, where you wish to surrender the Permit in whole or in part then you are required to notify the Council in writing. A formal Surrender Application Form is available upon request. For further details on this please contact the Council

8. PROCESS CHANGES

You are required to notify the Council of any proposed change in operation at least 14 days before making the change. This must be in writing and must contain a full description of the proposed change in operation and the likely consequences.

If the change could result in the breach of the existing permit conditions or is likely to require the variation of permit conditions then you must apply in writing under regulation 20(1), or involves a SUBSTANTIAL CHANGE to the installation you will be required to submit an application, pay the relevant fee and advertise the application accordingly. You should notify the Council 28 days before undertaking such changes



in the installation operation. You may serve a Notice on the Council requesting that they determine whether any change, which is proposed, would constitute a substantial change before you proceed with application.

9. **APPEALS**

Under regulation 31(1)c of the 2010 Regulations operators have the right of appeal to the Secretary of State against the conditions attached to their permit. The right to appeal does not apply where the decision or notice implements a direction given by the Secretary of State or Welsh Ministers. There is also no right of appeal if a revocation notice has been served for non-payment of subsistence fees (EP regulation 31(3)).

Appeals against a variation notices, enforcement notices and suspension notices do not have the effect of suspending the operation of the notice. Appeals do not have the effect of suspending permit conditions, or any of the mentioned notices. However, appeals against revocation notices suspend the operation of the notices coming into effect until the appeal is decided or withdrawn.

Notice of appeal against the conditions attached to the permit must be given within six months of the date of the notice, which is the subject matter of the appeal. The Secretary of State may in a particular case allow notice of appeal to be given after the expiry of this period, but would only do so in the most compelling circumstances.

How to appeal

There are no forms or charges for appealing. However, for an appeal to be valid, appellants (the person/operator making the appeal) are legally required to provide (see Schedule 6 of the 2010 Regulations, paragraph (2)2):

- written notice of the appeal;
- a statement of the grounds of appeal;
- a statement indicating whether the appellant wishes the appeal to be dealt with by written representations procedure or a hearing - a hearing must be held if either the appellant or enforcing authority requests this, or if the Planning Inspector or the Secretary of State decides to hold one.
- (appellants must copy the above three items to the local authority when the appeal is made)
- a copy of any relevant application;
- a copy of any relevant permit;
- a copy of any relevant correspondence between the appellant and the regulator; and
- a copy of any decision or notice, which is the subject matter of the appeal.

Appellants should state whether any of the information enclosed with the appeal has been the subject of a successful application for commercial confidentiality under regulation 49 of the 2010 Regulations, and provide relevant details. Unless such



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information is provided all documents submitted will be open to inspection. Further guidance on commercial confidentiality can be found in chapter 8 of the LA-IPPC and LAPPC manual.

Where to send your appeal documents:

Appeals should be despatched on the day they are dated, and addressed to:

**The Planning Inspectorate
Environmental Appeals Administration
Room 4/04 - Kite Wing
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN**

On receipt of an appeal and during the appeal process the main parties will be informed about the next steps, and will also normally be provided with additional copies of each other's representations.

To withdraw an appeal – which may be done at any time - the appellant must notify the Planning Inspectorate in writing and copy the notification to the local authority who must in turn notify anyone with an interest in the appeal.

Costs

Guidance from the Planning Inspectorate states that operator and regulator would be normally expected to pay their own expenses during an appeal. Where a hearing or enquiry is held as part of the appeal process, by virtue of Paragraph 5(6) of schedule 6 of the 2010 Regulations, either the appellant or the local authority can apply for costs. Applications for costs are normally heard towards the end of the proceedings and will only be allowed if the party claiming them can show that the other side behaved unreasonably and put them to unnecessary expense. There is no provision for costs to be awarded where appeals are dealt with by written representatives.



10. SECRETARY OF STATES GUIDANCE

This permit is covered by the relevant Secretary of State's Guidance:

Guidance Note PG 6/45 (11), Statutory Guidance "Surface cleaning" (Revised June 2014)

<http://www.defra.gov.uk/industrial-emissions/las-regulations/guidance/>

Pollution Prevention and Control Act 1999

<http://www.legislation.gov.uk/ukpga/1999/24/contents>

The Environmental Permitting (England and Wales) Regulations 2010

<http://www.legislation.gov.uk/ukdsi/2010/9780111491423/contents>

General Guidance Manual on Policy and Procedures for A2 and B Installations

<http://www.defra.gov.uk/industrial-emissions/las-regulations/guidance/>

11. Where a Permit condition imposes a requirement to forward documents to the Local Authority or to report a specified occurrence the following address and telephone number shall be used:

By Post **Telford & Wrekin Council,
Public Protection,
Addenbrook House,
Telford,
TF3 4NT.**

Email: environmentalprotectionteam@telford.gov.uk

By Telephone **01952 381818**