



Variation reference number: 881/26

## Schedule 2

<b>Operator</b>	<b>WHS CS Ltd</b>
<b>Installation Address</b>	Telford 54 Business Park Nedge Hill Telford Shropshire TF3 3AL
<b>Permit Reference</b>	112/130326
<b>Grid Reference</b>	SJ715079
<b>Registered Office</b>	WHS CS Ltd C/O WHS plastics, Water Orton Lane Minworth Sutton Coldfield B76 9BG
<b>Registered Number</b>	16821602

WHS CS Ltd is hereby permitted by Telford & Wrekin Council to carry out the activity of coating plastic vehicle components with solvents as defined under Schedule 1, Part 2, Section 6.4, Part B(a)(iv) and Schedule 14 of The Environmental Permitting (England and Wales) Regulations 2016 ("The Regulations") and other activities as listed and described below within the installation boundary marked in red on the attached plan in Appendix 1 and in accordance with the conditions within this permit.

Signed:

Name: Clair Travis

Date: 3 March 2019

Environmental Health Officer

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



Status log	Relevant Dates
Date Permit First Issued	3 March 2019
Date of Transfer from Polytec Car Styling UK Ltd to WHS CS Ltd	13 March 2026
Date of variation notice 881/26  Change of permit reference number from 18/00006/PPCB/010319 to 112/130326	13 March 2026

**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**

The installation carries out the painting and coating of plastic components for the automotive industry. The parts used in the coating process are specified by the customer and are required to match exactly the specifications for the product. The coated parts are then delivered offsite to the specific customer manufacturing line for assembly.

### **Raw Materials**

Bulk solvents for use in the paint mixing room are delivered in IBCs and offloaded into designated bunded storage areas. All paints, adhesives and process chemicals are delivered in sealed containers and stored within an internal bunded area.

### **Surface preparation**

The moulded products are stored in metal trolleys prior to the painting process. If required, specific areas of the product are protected with masking tape. The product is inspected in the grey room and then placed onto a jig which is located via a conveyor on the paint line. The parts are then subjected to a 4 stage power wash, which uses a 'pH neutral solution, followed by a tilt and vibrate station which eliminates the majority of surface water that has collected on the parts. The parts are then subjected to an auto blow off and if required a final manual blow. The parts are then dried via a drying oven and finally ionized air is used to remove any static build-up in the parts to prevent air borne dust attracting to the product surface.

### **Paint delivery and storage**

There is a designated delivery area for paints directly outside the paint storage area and this is linked via an air lock to the paint mixing room. The paint stores has an integral bund and emergency spill kits and processes are in place to clean up any spills. The area is also has an extraction system linked directly to the Regenerative Thermal Oxidiser (RTO) system.

### **Paint mixing**

All paint is mixed within the designated enclosed paint mixing room with the paint being diluted on site to the required specification.

Some of the paint will be supplied in 200ltr drums and if connected directly to pumps to be sent directly to the application robots, where fully contained mixing occurs with their relevant hardeners. Some of the low use basecoats colours are supplied in 25ltr drums and are mixed automatically in 25ltr containers. The mixed paint is then pumped to the application robots where fully contained mixing occurs with their relevant hardeners if required.

Air is extracted from the mixing room through filters and conducted to a recycled air handling unit where it is redirected to be used in the spray booth area. There is no direct emission point to atmosphere from the mixing room.

Robot spray gun heads are automatically cleaned in an enclosed gun wash facility which is located within the spray booth. The excess solvent cleaner is collected and stored in sealed drums ready for collection by an authorised waste collector for recycling off site.

### **Coating application**

The plastic products are conveyed throughout the paint plant on a conveyor system mounted on jig fixtures. Robots using pneumatic gun apply paint mechanically. There are 3 spray booths in total, with a flash off zone after each of the three paint applications. All incoming air is passed through fabric panel air filters that are fitted into the booth ceilings; all extracted air passes through the water curtain of the wet floor booths. This ensures that no dust enters the spray booths, and that no particulates exit the spray booths. All water from the wet floor booths is subject to a coagulant and flocculent treatment, collected paint sludge is removed by an authorised waste collector for disposal off site. Cleaned water is then returned back into the system.

Air flows over the product being sprayed on the conveyor line at a minimum speed of 0.35 m/s. Flash off and stabilisation zones have air flows at 0.4 m/s to ensure that there is no leakage of solvent mist from the spray booths. In all spray booths, the air is extracted and re-circulated through grills in the wet booth floor and then recirculated back to the relevant booth with a small portion, approximately 4%, exhausted to the RTO before being emitted to atmosphere.

The coating application is carried out in three stages with an oven cycle after every spray booth exit: Three stage coating process:



### **Stage 1 – Primer booth**

Prior to spraying, the primer is automatically mixed and pumped to the robot spray gun head. It is then mixed automatically with hardener at the point of application using a robotic pneumatic gun application. Primer aids the adhesion of the basecoat and levels the surface. After spraying, the primer is allowed to flash off and then dried in an oven for a period of 36 minutes at a temperature of 90°C +/- 2°C.

### **Stage 2 – Base coat booth**

Spray booth 2. Base coats are prepared and applied in a similar manner to primers. There are two separate coats applied using robotic gun application, after a flash off period the parts are dried in an oven for a period of 26 minutes at a temperature of 90°C +/- 2°C.

### **Stage 3 – Clear coat booth**

Spray booth 3. The clear coat is automatically mixed with hardener in a totally enclosed mixing unit immediately prior to being fed to the robot. There are two separate coats applied using robotic gun application, after a short flash off, the parts continue to the clear coat oven where it is dried for a period of 46 minutes at a temperature of 90 °C +/- 2°C. This promotes the evaporation of solvents from the paint, and hardens the surface thus ensuring a high quality finish. The product is then allowed to cool. Air is re-circulated back into the process.

### **Finishing process**

After cooling, the product is unloaded from the inspection area, any masking tape protecting the product removed and surfaces manually polished where appropriate. Any defects are first identified and sanded with a very fine grade of sandpaper. There is no dust extraction system due to the low level of dust produced. A small quantity of polish is then applied to the product before buffing with an air driven, hand held polishing tool.

### **Bonding and assembly**

Painted parts are then assembled to complete exterior parts for supply to automotive manufactures. This can involve a range of operations depending upon the customers' requirements, but may involve assembly of internal electronic parts and connectors, structural strengthening, lighting fixtures adhesive bonding or ultrasonic welding to complete the parts for delivery and is carried out typically by hand tools. Bonding uses a 2 component adhesive and is assembled manually in a cell.

The glue contains VOC as a solvent, this is released during the curing process. The glue is delivered in 50 litre drums and mixed with 5Kg of hardener just prior to application. Approximately 25g is applied to each part.

Fugitive emissions are controlled via an extraction system, passed through an activated carbon bed, then fed back in to the area to ensure no net pressure gain or loss. The bonding cell itself is enclosed and maintained at a slight over pressure to eliminate dust and dirt from the process. There is no direct extraction to atmosphere.

### **Other equipment**



The site also has a spray booth situated in the warehouse but this is not used for spraying as it is not connected to the RTO system. It is used for reworking parts using sanders and polishing mops and its purpose is to prevent dust from these operations contaminating materials in the warehouse.

### **Water Treatment**

Water from the wet floor spray booths is automatically pumped to the flocculation water treatment plant to remove suspended solids and dissolved materials. Tanks are located within a bunded area with no external route to drain. The wet back system is fully enclosed, fugitive losses via evaporation and approximately 10 l/hr from the management of the flocculent. There is no deliberate discharge of List I or List II substances from the installation. By-products of the water purification system are precipitated as hydrated metal oxides, and the resultant sludge is collected by a licensed waste contractor and buried off-site in a licensed landfill. An osmosis process is used for air humidification and dilution of water based paints.

The osmosis plant is a large scale de-ionization system with approximately 75% efficiency. For every 4 parts mains water we discharge 1 part effluent to sewer, as a salt concentration from the incoming water supply.

The trade effluent discharged to sewer is under consent from Severn Water. There are no deliberate discharges to groundwater due to the checks on system integrity. All water emissions are sampled for the requested substances as part of the consent.

### **Waste management and waste material storage**

Sealed drums and skips are stored in the waste storage area prior to disposal off site. The used paint cans are crushed and then placed in sealable drums. The plastic paint containers are washed in a can washer located in the Paint Stores prior to being disposed of via the appropriate waste stream.

Each of the Paint Booths are fitted with underfloor water wash systems to capture the overspray from the robot spraying and feed into separate tank for each booth. The water is pumped into a treatment tank where a flocculate is added, flocculated paint sludge is pumped to the decanter located in the sludge room. The decanter then squeezes out the water to leave a solid sludge, which is collected in a sludge cart.

### **Solvent emissions compliance option**

The operator has chosen to demonstrate compliance with the requirements of Schedule 14 of the Environmental Permitting (England and Wales) Regulations 2016 using the waste gas/fugitive emission option.

### **End of Introductory Note**



## Permit Conditions

### General

1. 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.
2. 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.
3. 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.
4. 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.
5. 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 2 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.
6. 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:  
[environmentalprotectionteam@telford.gov.uk](mailto:environmentalprotectionteam@telford.gov.uk)



7. The operator is permitted to operate an installation for the activities listed within Table 1, subject to the conditions of this permit.

<b>Table 1</b>		
<b>Activities listed in Environmental Permitting Regulations 2016</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
Schedule 1, Part 2, Section 6.4, Part B(a)(iv) and Schedule 14	The application of coatings containing VOCs onto plastic vehicle components	From receipt of raw materials, through to the disposal and processing of waste materials. This includes pre-treatment, coating, curing, and finishing, as well as handling and storage of any materials used, and the cleaning of plant and equipment.

8. Only the plant and equipment listed in table 2 shall be used for the permitted activities listed in Table 1.

<b>Table 2 – Permitted plant and equipment</b>	
<b>Plant and equipment</b>	<b>Emission Points Appendix 2</b>
Venjakob RTO , model number 12572	Stack 1
Emergency by pass for RTO	Stack 2
Spray booth 1	Air emissions sent to the RTO for destruction. Totally enclosed system.
Flash off zone and drying oven 1	
Spray booth 2	
Flash off zone and drying oven 2	
Spray booth 3	
Flash off zone and drying oven 3	
Water treatment	No air emissions.



<b>Table 3 – Emission limits, methods and frequency</b>					
<b>Row</b>	<b>Substance</b>	<b>Emission Limit</b>	<b>Source</b>	<b>Type of monitoring method</b>	<b>Monitoring frequency</b>
1	Carbon Monoxide	100 mg/Nm <sup>3</sup> as a 30-minute mean	Stack 1	Manual extractive	annual
2	Temperature	>800°C	RTO	recorded	continuous
3	Particulate Matter	50 mg/Nm <sup>3</sup> as 30-minute mean for contained sources	Stack 1	Manual extractive	annual
4	Oxides of Nitrogen (measured as nitrogen dioxide)	100 mg/Nm <sup>3</sup> as a 30-minute mean for contained sources	Stack 1	Manual extractive	annual
5	Isocyanates	0.1mg/Nm <sup>3</sup> as a 30 minute mean for contained sources excluding particulate and expressed as NCO.	Stack 1	Manual extractive	annual
<b>Waste gas and fugitive emission limits and requirements</b>					
<b>Row</b>	<b>VOC in waste gases</b>	<b>Emission limits/ requirements</b>	<b>Source and type of monitoring</b>	<b>Fugitive emission value</b>	<b>frequency</b>
7	Solvent consumption more than 15 tonnes per annum	50mg C/Nm <sup>3</sup> expressed as Total organic carbon (TOC)	RTO stack 1 manual extractive	20% of organic solvent input	Annual
<b>Emergency bypass stack for RTO</b>					
Row 8	The emergency bypass stack 2 shall be tested once to determine the amount of solvents in the waste gases. This shall be in gram/hour. The test shall be repeated only when there is a change in operation or a change in the coating materials. The results shall be used as part of the determination of O <sub>5</sub> as described in condition 29.				
<b>Provisions</b>					
<p>a) The reference conditions for emission limits in Table 2 are: 273.1K, 101kPa, without correction for water vapour content, unless otherwise stated.</p> <p>b) All manual extractive testing shall be representative and shall be in accordance with the relevant British or equivalent Standards.</p> <p>c) The introduction of dilution air to achieve emission concentration limits shall not be permitted.</p> <p>d) The operator shall ensure that relevant stacks or ducts are fitted with facilities for sampling which allow compliance with the sampling standards.</p>					



### **Emission limits, monitoring and reporting**

9. The emission limits, provisions, methods and frequency set out in Table 3 shall be complied with.
10. 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.
11. The results of non-continuous emission testing shall be forwarded to the regulator within 8 weeks of completion of the sampling.
12. 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.

### **Emission controls**

13. All other releases to air, other than condensed water vapour, shall be free from persistent visible emissions.
14. All emissions to air shall be free from droplets.
15. The number of start-ups and shut downs shall be kept to the minimum that is reasonably practicable.
16. There shall be no offensive odour beyond the site boundary detailed in appendix 1.
17. The operator shall have a written procedure for dealing with the failure of the RTO.
18. 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.
19. The regulator shall be informed without delay, whether or not there is related monitoring showing an adverse result:
  - 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 key arrestment plant.



20. 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 without delay. All of following criteria shall be taken into account:
- a) the toxicity of the substances being released;
  - b) the amount released;
  - c) the location of the installation;
  - d) the sensitivity of the receptors.
21. The emergency by-pass shall only be used in an emergency. Normal operations shall not be carried out while the emergency stack is on by-pass.
22. All activations of the emergency bypass to the permitted RTO shall be recorded and the Regulator informed of the following information:
- a) The time the RTO went onto by-pass.
  - b) The time the RTO came off by-pass.
  - c) The total time the activity operated under by-pass.
  - d) The total amount of solvent in kilograms released under by-pass.

#### **Continual Monitoring**

23. The continual temperature monitor readings shall be on display to appropriately trained staff.
24. Instruments shall be fitted with audible and visual alarms, situated appropriately to warn the operator of arrestment plant failure or malfunction.
25. The activation of alarms shall be automatically recorded.
26. All continuous monitors shall be operated, maintained and calibrated (or referenced, in the case of indicative monitors) in accordance with the manufacturers' instructions, which shall be made available for inspection by the regulator.
27. The relevant maintenance and calibration (or referencing, in the case of indicative monitors) shall be recorded.
28. Any continuous monitor used shall provide reliable data at least 95% of the operating time. A manual or automatic procedure shall be in place to detect instrument malfunction and to monitor instrument availability.



### **Solvent Management Plan (SMP)**

29. The operator shall forward to the regulator no later than 31 January of each year, a solvent management plan, which demonstrates for the previous 12 months, the following:

- a) The solvent purchased ( $I_1$ ), in kilograms.
- b) The solvent recovered and reused in the activity ( $I_2$ ), in kilograms.
- c) The amount of solvents in waste gases ( $O_1$ ), in kilograms.
- d) The amount of solvent from waste gases when the emergency bypass is in operation ( $O_1$ ), in kilograms.
- e) The figure derived from c and d shall be added together to give an overall amount of  $O_1$ , in kilograms.
- f) The amount of solvents destroyed by thermal oxidation and water treatment ( $O_5$ ), in kilograms.
- g) The amount of solvents in waste wipes, and empty drums ( $O_6$ ), in kilograms.
- h) The amount of solvents contained in mixtures sold as a commercially viable product, ( $O_7$ ), in kilograms.
- i) The amount of solvent sent for recycling ( $O_8$ ), in kilograms.
- j) The solvent consumption for the previous 12 months. The solvent consumption shall be calculated using the equation  $C = I_1 - O_8$ .
- k) Compliance with the fugitive emission value in Table 3 using the following equations:

i.  $F = I_1 - O_1 - O_5 - O_6 - O_7 - O_8$

ii. Fugitive emission value =  $\frac{F}{I_1 + I_2} \times 100\%$

30. All documentation to support the requirements in condition 29 shall be made available to the regulator on request.

### **Designated materials**

31. The operator shall not use any coating materials containing designated materials with the hazard statements, H340, H350, H350i, H360D, H360F, H341 or H351.

### **Operational Controls**

32. Coatings containing VOC shall be stored in closed containers.

33. All VOC containers including those containing VOC waste materials, shall be kept within a bunded area which:

- a) Has an impervious surface and resistant to the liquids in storage;
- b) is capable of holding 110% of the capacity of the largest storage tank.

34. All measures shall be taken to minimise VOC emissions during mixing, by using where practicable, covered or closed mixing vessels.

35. Emissions from the emptying of mixing vessels and transfer of materials shall be adequately contained, by the use of closed transfer systems. This shall be



achieved by the use of closed mobile containers, containers with close-fitting lids, or closed containers with pipeline delivery.

36. Where practicable, cleaning plant and equipment using solvents shall only be carried out within the spraybooths while the abatement is operational.
37. Where plant and equipment has to be cleaned off-line, cleaning shall be carried out in enclosed cleaning systems. Emissions shall be contained and vented to the abatement plant.
38. Cleaning operations involving organic solvents shall be reviewed at least once every two years, to identify opportunities for reducing VOC emissions). The regulator should be provided with a report on the conclusions of the review.
39. All reasonably practicable efforts shall be made to minimise the amount of residual organic solvent bearing material left in drums and other containers after use.
40. All organic solvent contaminated waste shall be stored in closed containers.
41. 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. 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.
43. Suitable organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas.
44. A high standard of housekeeping shall be maintained.

#### **Maintenance**

45. Flues and ductwork shall be cleaned to prevent accumulation of materials, as part of the routine maintenance programme.
46. The bund for the water treatment area shall be checked regularly and repaired where necessary.
47. 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**

- 48.** 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.
- 49.** 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.

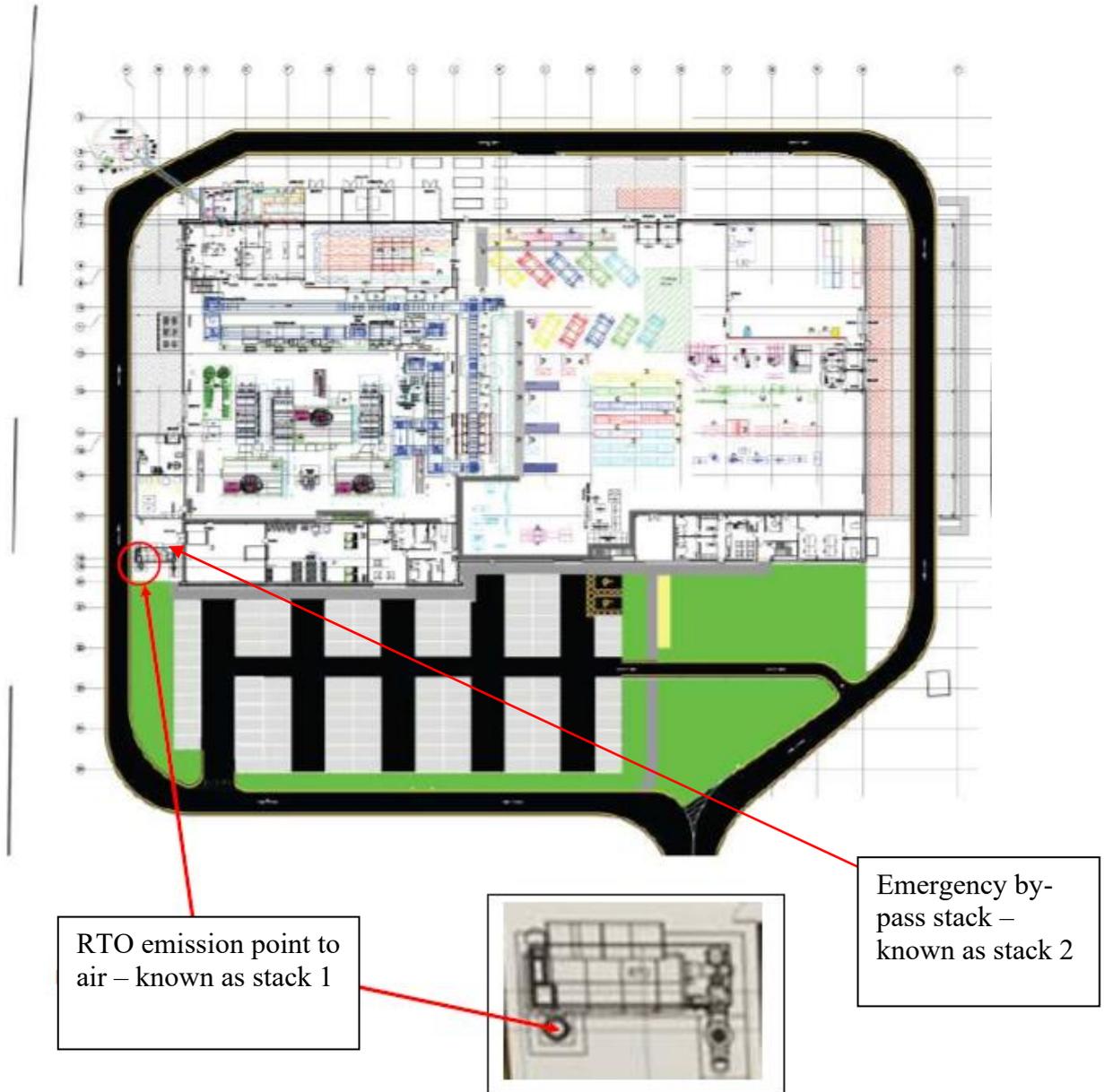


**Appendix 1. Location of Installation and site boundary**





**Appendix 2. – Site layout and process flow diagram**





**Appendix 2 Continued.**

	Process Description	Foreseeable emission to air, land and water
Delivery & Storage		<ol style="list-style-type: none"> <li>1. Paint, Solvents and other treatment chemicals to ground, drains or air in the event of spillage.</li> <li>2. Fugitive/odourous emissions during storage</li> </ol>
Preparation		<ol style="list-style-type: none"> <li>1. Scrap work due to defects</li> <li>2. Waste Wipes</li> </ol>
Coating		<ol style="list-style-type: none"> <li>1. Fugitive/odourous and unabated emissions VOC during paint mixing and gun cleaning</li> <li>2. Point source emissions of VOC and particulate matter from incinerator - value increases slightly start up and shut down as burner efficiency reduces.</li> <li>3. Reject Parts</li> <li>4. Discharge of treated waste water to foul sewer.</li> <li>5. Waste sludge from water treatment process.</li> <li>6. Possible spillage of water treatment chemicals to surface water drain.</li> <li>7. Packaging waste</li> <li>8. Combustion gases from oven and incinerator (NO<sub>x</sub> and CO<sub>2</sub>)</li> <li>9. Waste gun washing (recycled)</li> <li>10. Unabated VOC emissions (bypass system due to malfunction of abatement &amp; paint mixing /stores areas during normal production.</li> </ol>
Finishing		<ol style="list-style-type: none"> <li>1. Rejected Parts</li> <li>2. Fugitive particulate matter and VOC emissions</li> <li>3. Waste filters from rework process</li> </ol>

**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 3(10) of the Industrial Emissions 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/environmental\\_appeals/environmental\\_permitting\\_appeal\\_form.pdf](http://www.planning-inspectorate.gov.uk/pins/environment/environmental_appeals/environmental_permitting_appeal_form.pdf)

Guidance on the appeal procedure can be found at

[http://www.planning-inspectorate.gov.uk/pins/environment/environmental\\_appeals/environmental\\_permitting\\_guidance\\_notes.pdf](http://www.planning-inspectorate.gov.uk/pins/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. [environmentalprotectionteam@telford.gov.uk](mailto:environmentalprotectionteam@telford.gov.uk)

### **Correspondence Address**

All correspondence to Telford & Wrekin Council relating to this information shall be addressed to: Public Protection Telford and Wrekin Council Darby House Lawn Central Telford TF3 4JA.