

SCHEDULE 2 – CONSOLIDATED PERMIT



Hereby Permit

SURFACE TECHNIK (OLD HILL) LIMITED
C/O ADAMS MOORE LIMITED
38-39 ALBERT ROAD, TAMWORTH,
STAFFORDSHIRE, B79 7JS

To Operate A Part B Installation At

SURFACE TECHNIK (OLD HILL) LIMITED
SOVEREIGN WORKS, DEEPPDALE LANE
LOWER GORNAL, DUDLEY
DY3 2AF

Under The Provisions of

POLLUTION PREVENTION AND CONTROL ACT 1999
ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS
2010 (AS AMENDED)

Permit Reference Number

PB/41

Date Initial Permit Issued

26th January 2005

Variation Notice and Consolidated Permit Issued

T. Glews.

.....

.....

Dated: 10th October 2012

Tim Glews

Environmental Protection Manager

(Authorised to sign on behalf of Dudley Metropolitan Borough Council)

CONTENTS

Introductory Note.....	3
Status Log	3
Description of Installation	3
Conditions	4
1.0 The Permitted Installation	4
2.0 Emission Limits and Control	5
3.0 Solvent Emissions Directive.....	6
4.0 Monitoring Sampling and Measurement of Emissions.....	6
5.0 Process Controls	8
6.0 General Conditions	9
7.0 Records	10
Appendix 1 – Site Plan PB/41	11
Appendix 2 – Solvent Management Plan	12

INTRODUCTORY NOTE TO PERMIT

This Environmental Permit (The Permit) is issued by Dudley Metropolitan Borough Council (the Council) under Regulation 13(1) of the Environmental Permitting (England and Wales) Regulations 2010 (As Amended) (S.I. 2010 No.675), to operate an installation prescribed in Part 2 to Schedule 1 of those Regulations, to the extent specified in the conditions of this Permit.

The requirements of this Permit shall be effective from the date of service unless otherwise specified within the Permit. Where a Variation Notice has been served the conditions contained within that Variation Notice shall be effective from the date that the Notice is served, unless a specific implementation date is allocated to specific conditions.

For the purpose of this permit the legal operator of the Installation is Surface Technik (Old Hill) Limited, C/O Adams Moore Limited, 38-39 Albert Road, Tamworth, Staffordshire, B79 7JS, company number 01996845.

STATUS LOG

Detail	Reference	Date
Deemed Application for Environmental Permit	PB/41	1 April 2004
Permit Issued	PB/41	26 January 2005
Variation Notice WK/200647811/PDR/KD and Consolidated Permit Issued	PB/41	8 November 2006
Variation PB/41/WK/201227520 and Consolidated Permit Issued	PB/41	10 October 2012

DESCRIPTION OF INSTALLATION

The activities at the Installation include the cleaning of steelwork by shot blasting and the spray coating of the clean steelwork with paint. Approximately 20 tonnes of organic solvent, including some coating materials which contain isocyanates are used in any 12-month period.

All substances containing solvent are delivered to the site in sealed containers, and are stored outside inside two walk-in containers.

The steelwork is grit blasted in a Tilghman blast room, a Glass Bead Pen and a WKP blaster. All the grit blasters have bag filter units that remove particulate matter. All the emissions from the grit blasters, except those from the WKP Blaster, discharge internally.

Paint is applied in designated spray application areas using airless high-pressure, conventional, low pressure, pot and electrostatic spray guns in Bays 17 and 18. Emissions from the spraying operations are not contained. The coating application areas are ventilated via open doors and by means of two extractor and filter units situated in Bay 18.

Spray guns are cleaned in the open using proprietary gun cleaner or thinner. Waste from this cleaning is stored in sealed drums.

Waste materials from the process are stored in a skip, which is collected by a licensed waste disposal company.

This Installation falls within the definition of Part 2, Sections 6.4 and 7, Part B (a) (iv) of Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2010 (as amended). The attached location plan "Appendix 1 – Site Plan PB/41" shows the designated site.

CONDITIONS

1.0 THE PERMITTED INSTALLATION

- 1.1 The permitted Installation shall be comprised of the activities and associated activities specified in the table below:

Activity listed in Schedule 1 of PPC Regulations or Associated Activity	Description of specified activity
Directly Associated Activity - Preparation of steelwork.	The grit blasting of steelwork.
Section 6.4 – Coating Activities, Part B (a) (iv). Section 7 – SED Activities	The application of paint involving the use of 5-15 tonnes of organic solvent in any 12 month period.
Directly Associated Activity – Handling of waste materials	Collection and storage of waste including collected dust, used thinners and paint tins.

- 1.2 The activities authorised under Condition 1.1 shall not extend beyond the site, being the area shown hatched on the Site Plan PB/41 in Appendix 1 to this Permit.
- 1.3 If the operator proposes to make a change in operation of the installation, the operator must, at least 28 days before making the change, notify the Council in writing. The notification must contain a description of the proposed change in operation. It is not necessary to make such a notification if an application to vary this Permit has been made and the application contains a description of the proposed change. In this condition “change in operation” means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.
- 1.4 The best available techniques (BAT) 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 CONTROL

- 2.1 All emissions to air shall be free from persistent fume, persistent mist and droplets.

Emissions that consist entirely of steam and/or condensed water vapour are permissible.

- 2.2 The introduction of dilution air to achieve emission concentration limits contained within this authorisation is not permitted
- 2.3 The limit for emissions to air from contained emission points set out in the table below shall not be exceeded:

Pollutant	Emission Source	Concentration Limit
Particulate Matter	WKP blaster	50 mg/Nm ³ as 30 minute mean for contained sources.

The concentrations of substances measured in accordance with this condition shall be expressed at reference conditions 273.5K and 101.3kPa, without correction for water vapour.

3.0 SOLVENT EMISSIONS DIRECTIVE

- 3.1 The Operator shall submit annually to the Council a calculation of the annual 'consumption of organic solvent'. The calculation shall be carried out in accordance with Step 1 of the "solvent management plan" attached to this Permit as Appendix 2.
- 3.2 The total annual solvent emission from the coating activity shall not exceed the target emissions detailed in the table below:

Target Emission	
5-15 tonnes solvent consumption	Total mass of solids x 0.6
Over 15 tonnes	Total mass of solids x 0.37

In order to demonstrate compliance with this condition a calculation of the 'annual solvent emission' and the 'total mass of solids' and 'target emission' shall be carried out annually in accordance with Steps 1 to 5 of the Solvent Management Plan, attached to the Permit as Appendix 2, where the terms 'annual actual solvent emission' and 'total mass of solids' are defined. These calculations shall be submitted to the Council within three months of the end of the accounting period. The accounting period shall be each calendar year unless separately agreed in writing with the Council.

- 3.3 At no time shall the operator use any volatile organic compounds carrying any of the risk phrases R45, R46, R49, R60, R61, within the installation without the prior approval of the Council. The term 'risk phrase' shall have the same meaning as in Directive 67/548/EEC.
- 3.4 At no time shall the operator use any volatile organic compounds carrying any of hazard statement designations H340, H341 H350, H351, H350i, H360D or H360F, within the installation without prior approval of the Council. The term 'hazard statement' shall have the same meaning as in Regulation (EC) No 1272/2008.

4.0 MONITORING, SAMPLING AND MEASUREMENT OF EMISSIONS

- 4.1 Emissions from the stack serving the WKP blaster shall be monitored for concentrations of total particulate matter by 31st January 2013 and every year thereafter to demonstrate compliance with the emission limit stipulated in Condition 2.3.

- 4.2 The Operator shall notify the Council in writing at least 21 days before the commencement of any monitoring exercise undertaken in accordance with Condition 4.1. The notification shall include the name and address and any other relevant details of the person(s) or company engaged to undertake the monitoring exercise; the time, and date, on which the monitoring exercises are scheduled to begin, together with a full specification of the monitoring programme including the proposed sampling and analysis techniques.
- 4.3 During monitoring exercises the process being monitored must be operated under normal conditions, at full capacity and unless otherwise instructed by Officers of the Council, the monitoring shall be undertaken over the whole production cycle.
- 4.4 The results of non-continuous emissions monitoring undertaken in accordance with Condition 4.1 including process conditions at the time of testing shall be forwarded to the Council within 28 days of the completion of the testing unless otherwise agreed. A record of these results shall be maintained in accordance with Condition 7.1 of this Permit.
- 4.5 Adequate and safe facilities to enable monitoring/sampling to be carried out in accordance with Condition 4.1 shall be provided at the emission points specified in that condition.
- 4.6 When requested to do so by the Council the Operator shall observe the stack serving the WKP blaster for any visible emissions to air. The frequency and duration of the observations shall be agreed in writing with the Council. The observations shall be made from a position providing an unobstructed view of the point of emission to air by a responsible person who has been instructed to carry out these duties. The records shall include an assessment of the nature and severity of any emission observed, the source of emissions to air, details of any corrective action taken and the identity of the person making the record. A record of all observations shall be maintained in accordance with Condition 7.1.
- 4.7 When requested to do so by the Council the Operator shall assess the Installation for emissions of odour. The frequency and duration of the assessments shall be agreed in writing with the Council. The assessments shall be made from points on the Installation boundary where odour emissions are most likely to be detected taking into account the wind direction, wind speed, source of odour and location of receptors, by a responsible person who has been instructed to carry out these duties. A record of all olfactory assessments shall be maintained in accordance with Condition 7.1.

5.0 PROCESS CONTROLS

- 5.1 The solvent cleaning of plant, equipment and materials shall be carried out in such a manner that emissions of volatile organic compounds are reduced to an absolute minimum.
- 5.2 Spray coatings shall only be applied using low pressure (conventional or HVLP) guns, high pressure (airless) systems or any electrostatic application system.
- 5.3 The paint spraying process and any other process which may give rise to emissions of particulate matter into the air shall be carried out within enclosed buildings, thereby minimising fugitive emissions of particulate matter and odour.
- 5.4 The paint spray guns and associated equipment shall be cleaned using a totally enclosed cleaning machine, which is provided with the minimal necessary extract ventilation.
- 5.5 Any solvent-soaked wiping cloths organic solvent shall be kept in closed containers when not in use and sealed into closed containers while awaiting removal from site for disposal.
- 5.6 All waste substances containing solvents shall be stored in closed containers while awaiting removal from site for disposal or re-processing.
- 5.7 An adequate supply of suitable absorbent material shall be kept on site for use in the case of liquid spillages.
- 5.8 Spillages of liquids and finely divided materials shall be cleaned up immediately. Liquid spillages shall be contained and cleaned up by the use of a suitable absorbent material. Spillages of finely divided materials shall be removed by means of vacuum cleaning using an industrial grade vacuum cleaner or by wet cleaning methods, dry sweeping shall not be permitted. Any used absorbent material contaminated with substances containing solvents shall be stored in a closed container pending removal from site.
- 5.9 Accumulations of waste particulate matter arising from shotblast machines and any other particulate matter or filter material shall be collected and transported around the site in covered containers or sealed bags and stored whilst awaiting removal for disposal in covered containers or sealed bags within a waste materials skip or inside an enclosed building.

- 5.10 Drums and containers containing liquid materials, whether full, partly full or empty, shall be kept tightly closed to prevent any emissions to air.
- 5.11 The raw materials used in the installation and all waste materials produced by the activity shall be handled with care to prevent or reduce to an absolute minimum any emissions of particulate matter and volatile organic compounds to air.

6.0 GENERAL CONDITIONS

- 6.1 The Operator shall maintain and implement written procedures to ensure that regular cleaning and effective preventative maintenance in accordance with the manufacturer's instructions is employed on all plant, equipment and technical means concerned with the production, capture, transport, control and exhaust of emissions which could lead to an adverse impact on the environment. A record of relevant maintenance shall be maintained in accordance with Condition 7.1.
- 6.2 Essential spares and consumables shall be held on site or shall be available from a guaranteed supplier at short notice so that plant breakdown can be rectified rapidly.
- 6.3 The Installation shall be supervised by suitably trained staff who are fully conversant with the requirements of this Permit.
- 6.4 All staff shall be fully conversant with those aspects of the Permit conditions, which are relevant to their duties and shall be provided with adequate professional technical development and training and written operating instructions to enable them to carry out their duties.
- 6.5 The Operator shall maintain a record in accordance with Condition 7.1 of the skills and training requirements for all staff whose tasks in relation to the Installation may have an impact on the environment and shall keep records of all relevant training.
- 6.6 Any malfunction or breakdown which results in emissions to air which are likely to cause an adverse effect on the local community shall be reported to the Council and action taken to prevent or minimise further emissions to air immediately. A record of the incident shall be maintained in accordance with Condition 7.1.

7.0 RECORDS

7.1 The Operator shall ensure that all records required to be made by this Permit and other records made by it in relation to the operation of the Installation shall:

- (a) be made available for inspection by the Council at any reasonable time;
- (b) be supplied to the Council on demand and without charge;
- (c) be legible;
- (d) be made as soon as reasonably practicable;
- (e) indicate any amendments which have been made and shall include the original record wherever possible; and
- (f) be retained at the Installation, or other location agreed by the Council in writing, for a minimum period of 2 years from the date when the records were made, unless otherwise agreed in writing.

End of Permit Conditions

APPENDIX 1 – SITE PLAN PB/41



Reproduced from the O.S. Mapping with the permission of the Controller of HMSO 2004 Licensed LA

Appendix 2 - Solvent Management Plan for the Solvent Reduction Scheme

The Solvent Management Plan is the means by which compliance with the Solvent Reduction Scheme is assessed. The information detailed below shall be compiled for each accounting period and submitted to the Council within three months of the end of the accounting period:

1. Determination of Solvent Consumption
2. Calculation of the Total Mass of Solids for the annual accounting period
3. Calculation of the Target Emission for the annual accounting period
4. Calculation of the Actual Solvent Emission for the annual accounting period
5. Statement of Compliance

The steps required to carry out the above calculations are provided in the following boxes Steps 1 to 5 and contain information extracted from the relevant process guidance note. In some cases the procedure will be simpler than that outlined, such as the case where there are no solvent wastes recovered for reuse.

For the purposes of consistency the various I and O parameters detailed below have been assigned numbers which correspond to those assigned to the same parameters in the "Secretary of State's Process Guidance Note". A schematic diagram of these solvent inputs and outputs has been provided in Appendix 5.

Step 1: Determination of Solvent Consumption

The following steps should be followed:

- (1) Record the following details:
 - (a) the mass of solvent contained in raw materials and preparations in the initial stock **(IS)** at the start of the accounting period, plus;
 - (b) the mass of solvent contained in raw materials and preparations in the purchased stock **(PS)** during the accounting period;
 - (c) the mass of solvent contained in raw materials and preparations in the final stock **(FS)** at the end of the accounting period.
- (2) Calculate the total organic solvent input using the formula **$I_1 = IS + PS - FS$**
- (3) Calculate and state the annual consumption of organic solvent (C) using the following:

$$C = I_1 - O_8$$

Where: **I_1** = Total quantity of organic solvents or their quantity in preparations purchased which are used as input into the process/activity.

O_8 = Organic solvents contained in preparations recovered for reuse but not as input into the process/activity.

- (4) From the calculation of total organic solvent input in (2) above, determine whether any of the products, substances or preparations are designated assigned or needs to carry the risk phrases R40, R45, R46, R49, R60 or R61. If any such materials are identified their individual product description, risk phrase designation, quantity (kilograms) and product use shall be detailed.

Step2: Calculation of the Total Mass of Solids

"Total mass of solids" for the annual accounting period is the **total mass of solids in the quantity of coating consumed in a year**

- solids are all materials in coatings that become solid as a result of curing, polymerisation, or the evaporation of the water or solvent
- all ingredients other than water and organic solvents should be assumed to form part of the solid coating

Step 3: Calculation of the Target Emission

Target Emission = Total mass of solids used annually x 0.6

Step 4: Calculation of the Total Annual Solvent Emission

The **annual actual solvent emission** is calculated as follows:

$$\text{Annual actual solvent emission} = I_1 - O_8 - O_7 - O_6 (-O_5 \text{ if abatement has been used})$$

Definitions

- I_1 The quantity of organic solvents, or their quantity in preparations 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).
- O_8 Organic solvents contained in preparations recovered for reuse but not as input into the process/activity, as long as not counted under O_7 .
- O_7 Organic solvents, or organic solvents contained in preparations, which are sold or are intended to be sold as a commercially valuable product.
- O_6 Organic solvents contained in collected waste.
- O_5 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_6 , O_7 or O_8).

Step 5: Statement of Compliance

Compliance with the Solvent Reduction Scheme is achieved if the **Total Annual Solvent Emission** (Step 4) is less than the **Target Emission** (Step 3) for the same annual accounting period.



Explanatory Note to Environmental Permit (This note does not form a part of the Permit)

The enclosed Permit is issued under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010 (S.I. 2010 No.675), to operate an installation carrying out activities covered by the description in Part 2, Sections 6.4 and 7, of Schedule 1 of the EP Regulations, to the extent permitted by the Permit.

Best Available Techniques (BAT)

Aspects of the operation of the installation which are not regulated by specific conditions of the Permit are subject to the general condition included in the Permit requiring the operator to use BAT to prevent or reduce emissions that are not covered by specific permit conditions.

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.

The determination of what constitutes BAT is made on a case-by-case basis however where Process Guidance Notes are available these will be used as the baseline for what is BAT. Formal definitions of BAT can be found in the IPPC Directive.

Process Changes

The Permit contains a condition requiring you to notify the Council of any proposed change in operation at least 28 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 to the permitted activity. Failure to do so is an offence. It is also good practice to notify the Council of any administrative changes, such as the name or address of the operator.

Variations to the Permit

If you consider that a proposed change could result in the breach of the existing permit conditions or is likely to require the variation of permit conditions then you may apply in writing under Regulation 20 of the EP Regulations. Additionally, if this involves a SUBSTANTIAL CHANGE (A change in operation which, in the opinion of the Council may have significant negative effects on human health or the environment) to the installation you will be required to submit an application, pay the relevant fee and the application will be subject to publicity and consultation.

The Council may decide that the existing permit conditions require amendment without receiving any notification or an application for variation from the operator. This is most likely to occur when the Council has conducted a periodic review in accordance with EP regulation 34 or in the light of revised guidance from Defra. The Council will serve a Variation Notice under EP Regulation 20 on the Operator and may issue a consolidated Permit under EP Regulation 18.

Transfer of the Permit or Part of the Permit

Before the Permit can be wholly or partially transferred to another person, a joint application to transfer the Permit has to be made by both the existing and proposed holders, in accordance with EP Regulation 21. A transfer will be allowed unless Dudley Metropolitan Borough Council considers that the proposed holder will not be the person who will have control over the operation of the installation or will not operate the installation in accordance with the Permit.

Annual Subsistence Fee

Operators must pay an annual subsistence fee for the Permit in accordance with EP Regulation 65. This fee is payable annually on 1st April and the level of the subsistence fee payable is contained within the relevant charging scheme issued annually by the Secretary of State. The charging scheme is risk based. The method uses a point scoring method and applies a low, medium or high risk rating to activities operating at an installation. The resulting subsistence fees are proportionate to the risk rating.

You will receive an invoice each year with respect to this payment and you are advised that if prompt payment of the fee is not forthcoming, Dudley Metropolitan Borough Council may revoke your Permit under EP Regulation 22 or suspend your Permit under Regulation 65.

Public Register

The Council is required by Regulation 46 of the EP Regulations to maintain a Public Register containing information on all LA-IPPC and 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:

Dudley Metropolitan Borough Council,
Directorate of the Urban Environment,
Claughton House,
Blowers Green Road,
Dudley
DY2 8UZ

Confidentiality

An operator may request certain information in relation to the Permitted installation to remain confidential and not to be placed on the Public Register for reasons of National Security or commercial or industrial confidentiality. The operator must provide clear justification for each item he or she wishes to be kept from the register. Dudley Metropolitan Borough Council must consider and determine all requests of confidentiality of information in accordance with EP Regulation 51.

Talking to Us

Any communication with Dudley Metropolitan Borough Council with respect to this Permit should quote the Permit Reference Number, and should be made to:

Dudley Metropolitan Borough Council,
Directorate of the Urban Environment,
Claughton House,
Blowers Green Road,
Dudley
DY2 8UZ
Email: Enviroprotect.DUE@dudley.gov.uk
Telephone: 01384 814685
Fax: 01384 815599



Appeals

Under Regulation 31 of the EP Regulations operators have the right of appeal against the conditions contained within their permit. An appeal does not have the effect of suspending the Permit conditions.

Notice of appeal against the conditions attached to the permit must be given within six months of the issue date of the Permit, which is the subject matter of the appeal.

How to Appeal

There are no charges for making an appeal, application forms can be obtained from <http://www.planning-inspectorate.gov.uk/pins/environment/environmeny/index.htm>

For an appeal to be valid, appellants (the person/operator making the appeal) are legally required to provide:

- 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.

Where to Send Your Appeal Documents

Appeals should be addressed to:

The Planning Inspectorate
Environment Team, Major and Specialist Casework
Room 4/04 – Kite Wing
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN

0117 372 8726

In the course of an Appeal process the main parties will be informed of procedural steps by the Planning Inspectorate.

To withdraw an appeal the appellant must notify the Planning Inspectorate in writing and copy the notification to the local authority.