

The Pollution Prevention and Control (England and Wales) Regulations 2000
Regulation 17

Notice of Variation of Permit

Ref: WK/200647811/PDR/KD

To: Surface Technik (Old Hill) Limited

Of: Sovereign Works, 51 Deepdale Lane, Lower Gornal, West Midlands, DY3 2AF.

The Dudley Metropolitan Borough Council ("the Council") has decided that the permit to operate an Installation, namely

A coating and SED activity

at the premises known as Surface Technik (Old Hill) Limited, Sovereign Works, 51 Deepdale Lane, Lower Gornal, West Midlands, DY3 2AF.

granted to you by the Council on the 26th day of January 2006 under reference PB/41 should be varied in the following manner :

See Schedule 1 attached to this Notice.

The variation of the Conditions to the Permit and the date(s) on which they are to take effect are specified in Schedule 1 to this Notice.

Dated 8th November 2006

Signed:

Designation:

(Environmental Protection Manager)

Address for all communications:

Directorate of the Urban Environment
Claughton House
Blowers Green Road
Dudley
West Midlands DY2 8UZ

continued overleaf

NOTE

Under regulation 27 of the 2000 Regulations operators have the right of appeal against the conditions attached to their permit by a Variation Notice. The right to appeal does not apply in circumstances where the notice implements a direction of the Secretary of State given under regulations 12(15) (directions to regulators), 36 (general directions to regulators), paragraph (4) of regulation 27 (Appeals), paragraph 14(6) of Schedule 4 (directions determining applications for permits) or 6(6) of Schedule 7 (directions determining variation of permits).

Appeals against a Variation Notice 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.

Notice of appeal against a variation notice must be given within two months of the date of the Notice, which is the subject matter or 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.

SCHEDULE 1

The attached schedule should be read in conjunction with the Notice of Variation ref: PB/41

The requirements of the variation shall come into effect on the date indicated in the table below. If no date is indicated in the table below the variation shall take effect immediately.

- 1 The first paragraph of the Description of the Installation shall now read:

The activities at the Installation include the cleaning of steelwork by shot blasting and the spray coating of the clean steelwork with paint. Approximately 10 tonnes of organic solvent, including some coating materials which contain isocyanates are used in any 12-month period.

Deleted Conditions

- 1 Condition 3.1 shall be deleted.

Amended Conditions

- 2 Condition 3.2 shall be renumbered 3.3.
- 3 Condition 4.8 shall be renumbered 3.1 and shall now read:

The Operator shall submit annually to the Council a calculation of the annual "consumption of organic solvent" (C). The calculation shall be carried out in accordance with Step 1 of the "solvent management plan" attached to this Permit as Appendix 2.

- 4 Condition 4.9 shall be renumbered 3.4

New Conditions

- 6 Condition 3.2

The total annual solvent emission from the coating activity, shall not exceed the target emissions detailed in the table below for the dates specified.

Accounting Period	Target Emission
Between 31 st October 2005 and 31st October 2007	Total mass of solids x 0.9
After 31 st October 2007	Total mass of solids x 0.6

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.”

General

- 7 Appendix 2 shall be amended to take account of the Solvent Reduction Scheme and shall read as detailed overleaf:

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.

Step 2: 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

For any accounting period falling entirely between 31st October 2005 and 31st October 2007:

Target Emission = Total mass of solids used annually x 0.9

and,

For any accounting period falling entirely after 31st October 2007:

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:

Annual actual solvent emission = $I_1 - O_8 - O_7 - O_6$ (- O_5 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.

