



**Notice of Variation of Permit
The Environmental Permitting (England and Wales) Regulations 2016
Regulation 20**

To: **Delta GBN Limited, Lodgefield Rd, Halesowen, West Midlands, B62 8AX**

Dudley Metropolitan Borough Council ("the Council") in the exercise of the powers conferred upon it by Regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016¹ (as amended) ("the 2016 Regulations") hereby gives you notice as follows:

The Council has decided to vary the terms and conditions of the Permit reference PB/42 granted to you under Regulation 13(1) of the 2016 Regulations in respect of the operation of the Installation at:

Delta GBN Limited, Lodgefield Rd, Halesowen, West Midlands, B62 8AX

The variation of the terms and conditions of the Permit and the date on which they are to take effect are specified in Schedule 1 to this Notice.

A consolidated Permit as varied by this Notice (and by all previous variation notices listed in the "Status Log" to the Permit) is set out in Schedule 2.

Signed:  Dated: ...27th February 2018
Tim Glews
Public Protection Manager
(Authorised to sign on behalf of Dudley Metropolitan Borough Council)

Address for all communications:

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Health & Wellbeing Division
Environmental Safety and Health
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SCHEDULE 1

This schedule should be read in conjunction with the Notice of Variation ref: WK/201805769

The requirements of this variation shall come into effect as detailed below. If no date is indicated below the variation shall take effect immediately.

Process Description-Description of Installation

The Description of the installation shall be amended as described below:

The activity at the Installation includes an anti-corrosion coating process for small industrial components which utilises approximately 10 tonnes of solvent per annum.

~~An enclosed vapour degreasing machine using below 1 tonne per annum of Perchloroethylene is used to clean components at the Installation. The degreasing machine has an integrated carbon solvent recovery unit and is ventilated directly to atmosphere via one chimney stack.~~ Two degreasing units are used to clean components at the installation: a Technowash degreaser and Vixen degreaser, that use water based products in their operation.

The raw materials used for coating purposes are delivered to the Installation in sealed containers and are stored within the process building until required for use. The coating materials are applied ~~directly without further dilution following addition of solvent to achieve the required viscosity for production purposes..~~

~~Two shot blast units are is used to surface clean components that both and exhausts internally. to the external air via a bag filter unit which discharges into a vertical stack.~~

Components are coated either by dip spin coating, drip drain plant, or by spray application in a spray booth.

A dipping machine and associated air spinner is used for dip spin coating. The dipping machine is not vented to external atmosphere. Components are spun dry and cured in a tunnel oven extracted to air through a stack DEL 2.

A small self-enclosed dip spin plant, which is used occasionally for sampling, is vented directly to external atmosphere via a single chimney stack. Emissions from this unit are trivial and there is no justification for emissions testing of the stack.

The dip drain plant includes a dipping tank and a PSW Nopump water wash spray booth for drip removal (by air gun) that is extracted to external atmosphere through a stack (DEL 4). The coated components are then cured in an overhead track tunnel oven that is extracted to external atmosphere through a stack (DEL 5).

A PSW Nopump water wash spray booth is used for colour coating of components for occasional spray application (Electrostatic or HVLP), which is extracted to external atmosphere through a stack (DEL 6). The coated components are then cured in an overhead track tunnel oven that is extracted to external atmosphere through a stack (DEL 7).

Relevant waste material arising from the process consists of a dry flake and waste containing solvent laden material that is mainly stored externally in sealed 205 litre drums.

This Installation falls within the definition of Part 1 Section 6.4, Part B (a) (iv) of Schedule 1 of the ~~Pollution Prevention And Control~~ Environmental Permitting (England and Wales) Regulations 2016. The attached location plan "Appendix 1 – Site Plan PB/42" shows the designated site.

STATUS LOG

Detail	Reference	Date	Comments
Deemed Application Made	PB/42	1 st April 2004	
Permit Issued	PB/42	31 st October 2007	
Environmental Permit	PB/42	6 th April 2008	Transfer to Environmental Permit by virtue of Regulation 69 of the Environmental Permitting (England and Wales) Regulations 2007
Permit Varied	PB/42	27 th February 2018	

Deleted Conditions

Condition 3.2 is deleted from the permit.

Condition 3.7 is deleted from the permit.

New Conditions

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.

Amended Conditions

The following conditions of the Permit shall be amended as described below:

1.1 The permitted Installation shall be comprised of the activities and associated activities specified in Table 1.1

Table 1.1	
Activity listed in Schedule 1 of EP Regulations or Associated Activity	Description of specified activity
Directly Associated Activity - Preparation of metal components.	The shot blasting of metal components. Degreasing of metal components.
Section 6.4 – Coating Activities, Part B (a) (iv) Section 7 – SED Activities, Part B	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.

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

Emissions which comply with the provisions of Condition 2.3 and consist entirely of steam and/or condensed water vapour are permissible.

2.3 All emissions to air shall be free from offensive odour outside the Installation boundary as perceived by an authorised officer of the Council. It shall not be a breach of the condition in a particular case if the operator can demonstrate that all reasonable steps were taken, and all due diligence was exercised, to prevent the release of offensive odour.* (see footnote)

2.5 The limit for emissions to air from contained emission points set out in the Table 2.5 shall not be exceeded.

Table 2.5		
Pollutant	Emission Source	Concentration Limit
Particulate Matter	<p>Stacks serving shot blast units</p> <p>Stacks serving spray booths (DEL 4 and DEL 6)</p> <p>Sampling dip spin plant</p>	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 273.15K and 101.3 kPa, without correction for water vapour.

3.1 Compliance with the ~~Solvent Emissions Directive~~ Industrial Emissions Directive 210/75/EU shall be via the Contained and Fugitive Emission Limit Route. The operator shall by the ~~31st January 2008~~ 1st December 2017, and annually thereafter, calculate and submit to the Council:

- a. a calculation of the annual “consumption of organic solvent” (C) for the preceding annual period between 31st August and 1st September. The calculation shall be carried out in accordance with the “Solvent Management Plan” attached to this Permit as Appendix 2.
- b. a determination of the Fugitive Emission Value for the Installation for the preceding annual period between 31st August and 1st September. The calculation shall be carried out in accordance with the methodology detailed in

the Solvent Management Plan attached to this Permit as Appendix 3 where the term Fugitive Emission Value is defined. This exercise shall be repeated within three months of any modification of equipment being carried out if the modification is likely to affect the fugitive emission value of the Installation.

- 3.3-2 Emissions to air of Volatile Organic Compounds from the stacks serving the spraybooths (DEL 4 and DEL 6), and ovens (DEL 2, DEL5, DEL 7) shall not exceed the limit set out in the Table 3.32 below.

Table 3.2			
Solvent Consumption	Parameter	Source	Limit
Solvent Consumption 5-15 tonnes	VOC expressed as total mass of organic matter	Stacks serving spraybooths, sampling dip spin plant and ovens	100mg Carbon/Nm ³ as 30 minute mean for contained sources

At least three readings must be obtained during each measurement exercise.

The hourly average of the 30-minute means values may be used to demonstrate compliance, provided that no hourly average exceeds the emission limit by more than a factor of 1.5.

Condition 3.4 shall be renumbered 3.3.

Condition 3.5 shall be renumbered 3.4.

Condition 3.6 shall be renumbered 3.5.

- 4.1 Emissions from the stacks serving the shot blast units and spray booths (DEL 4 and DEL 6) detailed in Table 2.5 shall be monitored for concentrations of total particulate matter once every 12 months to demonstrate compliance with the emission limit stipulated in Condition 2.5. Emissions from the stack serving the sampling dip spin plant shall be monitored for concentrations of total particulate matter to demonstrate compliance with the emission limit stipulated in Condition 2.5, when requested by the Council.

- 4.2 Emissions from the stacks serving the spraybooths and ovens (DEL 2, DEL 4, DEL 5, DEL 6, DEL 7) shall be monitored for concentrations of volatile organic compounds once every 12 months to demonstrate compliance with the emission limit stipulated in table 3.32. ~~Emissions from the stack serving the sampling dip spin plant shall be monitored for concentrations of volatile organic compounds to demonstrate compliance with the emission limit stipulated in Condition 3.3, when requested by the Council.~~
- 4.4 During monitoring exercises the process being monitored must be operated under normal conditions and at full capacity. ~~and unless otherwise instructed by Officers of the Council, the monitoring shall be undertaken over the whole production cycle.~~
- 4.7 Adequate and safe facilities to enable monitoring/sampling to be carried out in accordance with Condition 4.1 and 4.2 shall be provided at the emission points specified in those conditions.
- 4.8 All stacks shall be observed for any visible emissions to air once per shift for a period of at least five minutes. 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. A record of all observations shall be maintained in accordance with Condition 7.1. 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.

The Council shall be notified as soon as practicable if emissions to air are observed which may contravene any conditions of this permit authorisation. Immediate action shall be taken to determine the cause of the emission and to prevent or minimise further emissions.

- 4.9 The Installation shall be assessed for emissions of odour to air once per shift for a period of at least 5 minutes. The olfactory assessment 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 observations shall be maintained in accordance with Condition 7.1.

The records shall include a subjective assessment of the nature and severity of any odour detected, the location of the assessment, the wind direction and strength, weather conditions, likely source of emissions to air, details of any corrective action taken and the identity of the person making the record.

The Council shall be notified as soon as practicable if odour emissions are detected which may contravene any condition of this Permit and immediate action shall be taken to determine the cause of the emission and to prevent or minimise further emissions.

- 5.4 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.
- 5.8 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.
- 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 **an officer of** 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.

General

All references to the Environmental Permitting (England and Wales) Regulations 2007 and 2010 shall be replaced with references to the Environmental Permitting (England and Wales) Regulations 2016 (“the EP Regulations”)

Footnotes

An additional footnote shall be added to the Permit as described below:

****"Due diligence" means that there shall not be a breach of the odour boundary condition 2.3 if the operator can demonstrate that BAT was employed.***

Step 1 of Appendix 3 is amended as follows:

Step 1: Determination of Solvent Consumption

Determine the Annual Solvent Consumption in accordance with the calculation procedure in Appendix 2.

End of Permit Variations

Attached to this note is a separate document titled "Guidance for operators receiving a Variation Notice" which does not form part of the Notice. You are advised to read that document and ensure that you fully understand the requirements of the Notice and your rights of appeal.

SCHEDULE 2

Consolidated permit reference PB/42 issued on 14th February 2018 as varied by Variation Notice reference PB/42/WK201805769

(Corrected consolidated permit attached as separate document)