

24th December 2008

Ms. Vicky Hulse
Environmental Health Officer
Environmental Protection
Directorate of the Urban Environment
Claughton House
Blowers Green Road
Dudley
West Midlands
DY2 8UZ

P.O. Box 24
Dudley, West Midlands, DY1 2RL
Tel: 01902 880123
Fax: 01902 880019
Email: admin@robertlickley.co.uk
www.robertlickley.co.uk

30 DEC 2008

*Checked in file
on 31/12/08*

Dear Ms. Hulse,

RE : The Environmental Permitting (England & Wales) Regulations 2007

Further to your recent visit to our works and discussions with Mr. Andrew Winwood concerning the above, we are writing in response to your letter of the 21st November 2008 on the subject and to return the application form included with your letter, which has been completed to the best of our ability.

Having completed the application form, we are left even more confused as to the need for us to register under the legislation given the fact that the considerable investment made by this Company in the silo and pump equipment actually resulted in significant environmental improvements being achieved when compared with the older method of production - these being :

- A reduction in the use of diesel required for forklift trucks to unload full lorry loads of paper bagged material and to move the same material to various stocking sites and production areas within the premises. The removal of this operation also resulted in improvements on air and noise pollution caused by forklift truck movements.
- A total reduction in the use of paper bags and wooden pallets previously used to pack the high alumina cement now contained in the silo, thereby making a saving of natural resources for the production of the bags and pallets.
- The elimination of the need to dispose of 16,000 (3,500 kilos) of waste paper bags per annum - containing a residue of high alumina cement in each bag - to landfill sites, thereby making a considerable saving for the environment.
- A reduction in the number of skips required on a monthly basis as a result of no longer having to dispose of the bags, thereby saving on diesel, air and noise pollution, plus a reduction in traffic movements on our congested roads.
- A reduction in airborne dust which was previously created by the old method of having to physically break open paper bags, some of which was removed by means of extractors, plus a reduction in the amount of waste dust collection in those extractions, which again had to be disposed of.

All of the foregoing environmental benefits have been achieved as a direct consequence of the investment made by this Company in the silo and pumping equipment, which by comparison with the old method of production has a minimal - almost negligible - impact on the environment.

Given all of the foregoing, we are at a loss as to why we should now have to pay once again for the improvements we have made, both to the environment and our employees' welfare, particularly at a time when manufacturing industry is heading for possibly the worst recession in living memory.

Originally we were advised by the silo manufacturer - who incidentally is no longer in business - that there was no requirement for us to apply for such a permit and we will look forward to receiving your comments in respect of the application we have submitted, together with an indication of whether or not we have to register.

The Defra website states that the deliverable aim of Environmental Permitting is to cut unnecessary red tape and bring cost-savings to industry and the Government keeps talking about reducing the burden of red tape on industry but if we are required to register in this instance, then we feel that this is having entirely the opposite effect on our business and a negative impact as far as investment in any future environmental improvements are concerned.

We will look forward to receiving your reply in due course.

Yours sincerely,



B. Bridgen
Chairman

Enc.



C- JAN 2008

APPLICATION FORM FOR A PART B PERMIT

LOCAL AUTHORITY POLLUTION PREVENTION AND CONTROL

Pollution Prevention and Control Act, 1999
Environmental Permitting (England and Wales) Regulations 2007

INTRODUCTION

WHEN TO USE THIS FORM

This regime is known as Local Authority Pollution Prevention and Control (LAPPC). Installations permitted under this regime are known as B installations. Use this form if you are sending an application for a 'Part B' permit to a Local Authority under the Environmental Permitting (England and Wales) Regulations 2007 ("the EP Regulations").

BEFORE YOU START TO FILL IN THIS FORM

Please read the DEFRA general guidance manual issued for LA-IPPC and LAPPC. This contains a list of other documents you may need to refer to when you are preparing your application, and explains some of the technical terms used. You will also need to read the relevant sector guidance note, BREF note or Process Guidance note as relevant. The Environmental Permitting (England and Wales) Regulations 2007 can be obtained from The Stationary Office, or viewed on their website at: http://www.opsi.gov.uk/si/si2007/uksi_20073538_en_1.

WHICH PARTS OF THE FORM TO FILL IN

You should fill in as much of this form as possible. The appropriate fee must be enclosed with the application to enable it to be processed further. When complete please send the original form and all other supporting material to:

Dudley M.B.C.
Directorate of the Urban Environment
Environmental Protection
Claughton House
Blowers Green Road
Dudley
DY2 8UZ

01384 814685
EnviroProtect.DUE@dudley.gov.uk

LAPPC APPLICATION FORM TO BE COMPLETED BY THE OPERATOR

For Local Authority Use		
Application Reference:	Officer Reference:	Date Received

A1.1 NAME OF THE INSTALLATION

✓ Silo & Pump System for the Storage & Movement of High Alumina Cement

A1.2 PLEASE GIVE THE ADDRESS OF THE SITE OF THE INSTALLATION

UNIT 8, DORMSTON TRADING ESTATE
BURTON ROAD, DUNDEY, WEST MIDLANDS
Postcode DY1 2UF Telephone (01902) 880123

The Ordnance Survey national grid reference 8 characters for examples SJ 123 456 (can be obtained from typing postcode into one of the on-line mapping sites).

S0925918

A1.3 EXISTING PERMITS

Please give details of any existing LAPC or IPC Permit for the installation, including reference number(s):

NONE

Please provide the information requested below about the "Operator", which means the person who it is proposed will have control over the installation in accordance with the permit (if granted).

A2.1 THE OPERATOR

Please provide the full name of Company or Corporate Body

ROBERT LICKLEY REFRACTORIES LTD.

Trading/business name (if different)

A3.1 WHO CAN WE CONTACT ABOUT YOUR APPLICATION?

It will help to have someone who we can contact directly with any questions about your application. The person you name should have the authority to act on behalf of the operator. This could be an agent or consultant rather than the operator.

Name BENIE BRIDGEN

Position DIRECTOR

Address P.O. Box 24, DUDLEY
WEST MIDLANDS

Postcode DY1. 2RL

Telephone number _____

Fax number _____

E. Mail address _____

B1 ABOUT THE INSTALLATION

Please fill in the table below with details of all the current activities in operation at the whole installation.

In "**Activities In The Stationary Technical Unit**" please identify all activities listed in Schedule 1 Part 2 to the EP Regulations that are, or are proposed, to be carried out in the stationary technical unit of the installation.

In "**Directly Associated Activities**" please identify any directly associated activities that are, or are proposed, to be carried out on the same site which:

- Have a technical connection with the activities in the stationary technical unit
- Could have an effect on pollution

B1.1 TABLE OF ACTIVITIES AT THE INSTALLATION

ACTIVITIES IN THE STATIONARY TECHNICAL UNIT	
✓	The manufacture and packaging of dry high alumina refractory concretes.

B2.2 Once all foreseeable emissions have been identified in the proposed installation activities, each emission should be characterised (including odour) and quantified.

Atmospheric emissions should be categorised under the following:

- (i) Point source, (e.g. chimney/vent, identified by a number and detailed on a plan)
- (ii) Fugitive source (e.g. from stockpiles/storage areas).

If any monitoring has been undertaken please provide the details of emission concentrations and quantify in terms of mass emissions. If no monitoring has been undertaken please state this.

(Mass Emission – the quantification of an emission in terms of its physical mass per period of time. E.g. Grams per hour, tonnes per year)

B2.3 For each emission identified from the installations' activities describe the current and proposed technology and other techniques for preventing or, where that is not practicable reducing the emissions. If no techniques are currently used and the emission goes directly to the environment, without abatement or treatment this should be stated.

Doc Reference BB2

B2.4 Describe the proposed systems to be used in the event of unintentional releases and their consequences. This must identify, assess and minimise the environmental risks and hazards, provide a risk based assessment of any likely unintentional releases, including the use of historical evidence. If no assessments have been carried out please state.

Doc Reference BB2

B2.5 Describe the proposed measures for monitoring all identified emissions including any environmental monitoring, and the frequency, measurement methodology and evaluation procedure proposed. (e.g. particulate matter emissions, odour etc). Include the details of any monitoring which has been carried out which has not been requested in any other part of this application. If no monitoring is proposed for an emission please state the reason.

Doc Reference BB2

B2.6 Provide detailed procedures and policies of your proposed environmental management techniques, in relation to the installation activities described.

Doc Reference BB2

C1 FEES AND CHARGES

An application fee of £ 1,514 is applicable to your Installation. Your application cannot be processed unless the application fee is correct and enclosed.

Cheques should be made payable to: Dudley M.B.C.

We will confirm receipt of this fee when we write to you acknowledging your application.

- C1.1 Please give any company purchase order number or other reference you wish to be used in relation to this fee.

C2 ANNUAL SUBSISTENCE CHARGES

If we grant you a permit, you will be required to pay an annual subsistence charge, failure to do so will result in revocation of your permit and you will not be able to operate your installation.

- C2.1 Please provide details of the address you wish invoices to be sent to and details of someone we may contact about fees and charges within your finance section.

ROBERT LICKLEY REFRACTORIES LTD

P.O. Box 24, DUDLEY

WEST MIDLANDS

Postcode DY1 2RL Telephone (01902) 880123

C3 COMMERCIAL CONFIDENTIALITY

- C3.1 Is there any information in the application that you wish to justify being kept from the public register on the grounds of commercial confidentiality?

No ☒

Yes ☐

Please provide full justification, considering the definition of commercial confidentiality within the EP regulations.

Doc Reference

- C3.2 Is there any information in the application that you believe should be kept from the public register on the grounds of national security?

No ☒

Yes ☐

The following offences have been committed in the previous five years which may be relevant to my/our competence to operating this installation in accordance with the Regulations:

Signature _____
Name _____
Position Director
Date 22/12/08

C6 Declaration

C6.1 SIGNATURE OF CURRENT OPERATOR(S)*

I/We certify that the information in this application is correct. I/We apply for a permit in respect of the particulars described in this application (including supporting documentation) I/We have supplied.

Please note that each individual operator must sign the declaration themselves, even if an agent is acting on their behalf.

For the application from:

Installation name: Robert Lickley Refractories Ltd - Silo & Pump System

Signature _____

Name _____

Position Director

Date 22/12/08

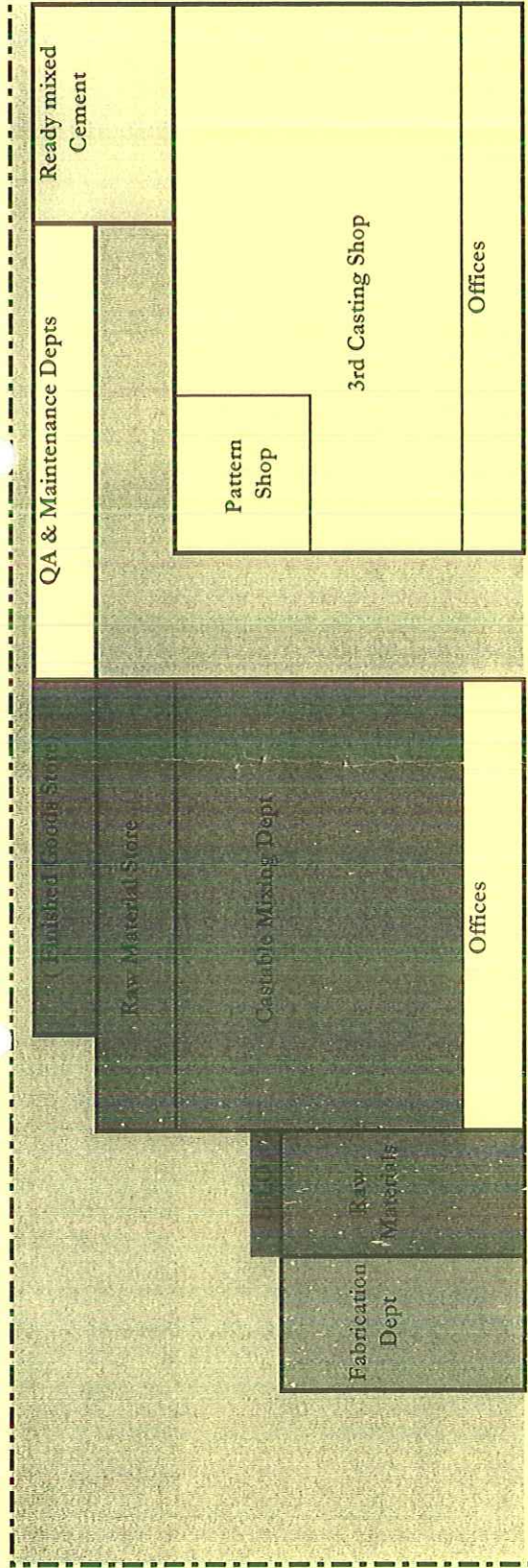
Signature _____

Name _____

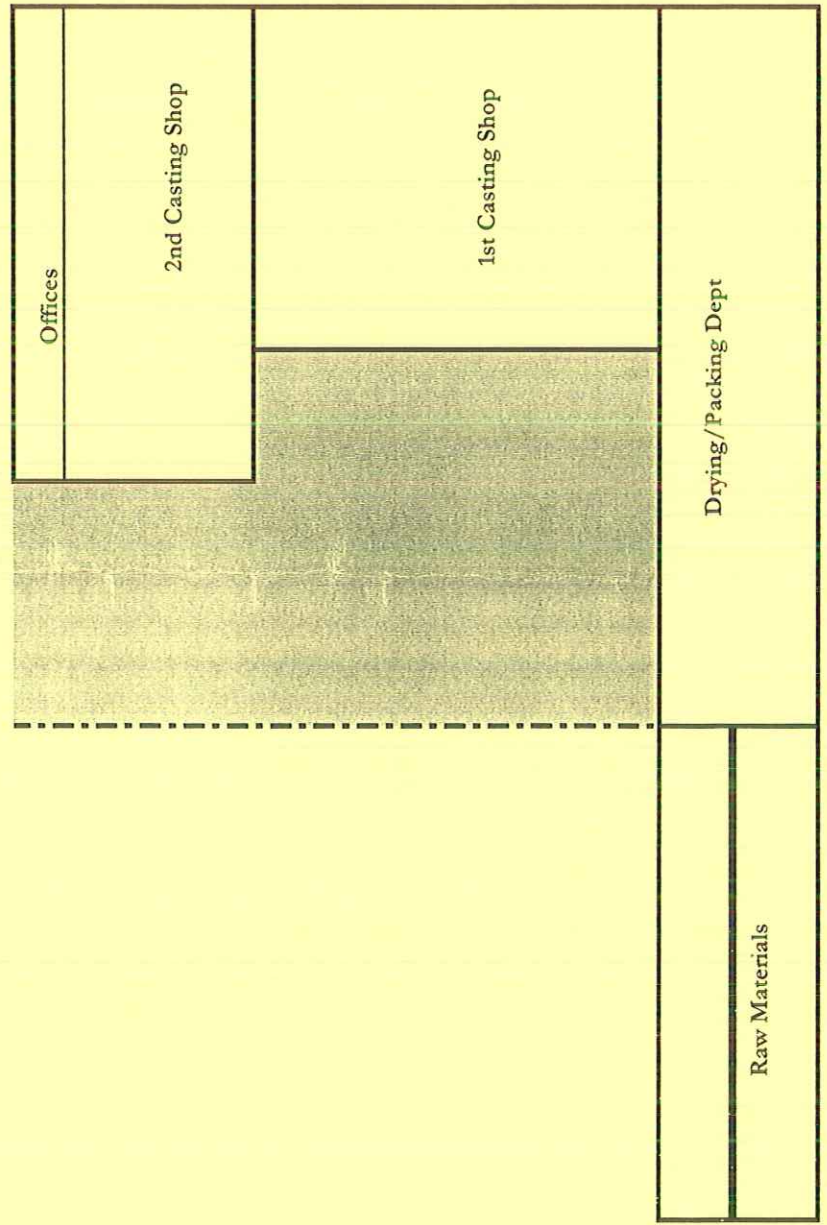
Position _____

Date _____

*Where more than one person is defined as the operator, all should sign. Where a company or other body corporate – an authorised person should sign and provide evidence of authority from the board of the company or body corporate.



DORMSTON TRADING ESTATE ROAD



- B2-1** The silo and pneumatic pumping system were installed to convey precise amounts of high alumina cement mechanically from a bulk silo to a mixer containing refractory aggregates and additives to produce a specialised high alumina refractory concrete finished product.

This system was installed for 2 primary reasons - these being :

- a) The Health and Safety of employees as the movement of the cement by mechanical means would mean the removal of the necessity for operatives to physically manual handle 50kg paper sacks, which was the current method of introducing the cement to the final mix.
- b) Environmental reasons because the introduction of the silo and pump significantly improved the impact on the environment by removing several factors which occurred through the handling of paper bags.

This was because there are no emission problems during the start up and shut down of the equipment, with the only emissions which may occur being confined to the filling of the silo from a tanker by the use of compressed air.

- B2-2** The environmental improvements achieved as a result of switching from a paper bag method of purchasing high alumina cement to the silo bulk storage of the material are as follows :

- A reduction in the use of diesel required for forklift trucks to unload full lorry loads of paper bagged material and to move the same material to various stocking sites and production areas within the premises. The removal of this operation also resulted in improvements on air and noise pollution caused by forklift truck movements.
- A total reduction in the use of paper bags and wooden pallets previously used to pack the high alumina cement now contained in the silo, thereby making a saving of natural resources for the production of the bags and pallets.
- The elimination of the need to dispose of 16,000 (3,500 kilos) of waste paper bags per annum - containing a residue of high alumina cement in each bag - to landfill sites, thereby making a considerable saving for the environment.
- A reduction in the number of skips required on a monthly basis as a result of no longer having to dispose of the bags, thereby saving on diesel, air and noise pollution, plus a reduction in traffic movements on our congested roads.
- A reduction in airborne dust which was previously created by the old method of having to physically break open paper bags, some of which was removed by means of extractors, plus a reduction in the amount of waste dust collection in those extractions, which again had to be disposed of.

- B2-3** There is the possibility that there can be a slight emission of dust during the filling procedure from the tanker but the unit itself is fitted with a DCE Donaldson filter which will only release 4 milligrams/m³ into the atmosphere.

- B2-4** The silo has been encased in steel around the discharge area at the bottom of the unit in order to contain any unintentional spillage which may occur for any reason, including routine maintenance of the plant.

Any spillage which might occur is therefore contained within this sealed area and would be cleared up by use of an industrial vacuum cleaner.

B2-5 Because the silo equipment is situated outside and because any emissions to air which may occur whilst filling is taking place would be extremely minimal and exceptionally difficult to measure, no precise monitoring has been carried out other than visual inspections.

B2-6 The introduction of the silo and pump system of mixing high alumina cement around our mixing plant significantly reduced the need for carrying out our normal assessment of the types of waste being generated and discarded (now zero), legal status of waste disposal carriers (no longer required) etc. and therefore the only major consideration which we have to take account of is the checking of any waste product which may escape to ensure that it is non-hazardous, plus procedures for dealing with any accidental spillage, along with ensuring that the type of tanker used complies with all environmental and other safety requirements.

B3-1 We do not foresee any potential significant local environmental effects as far as dust emissions are concerned from the silo/pump equipment as the system within the factory itself has dust extraction equipment which is all sited internally.

We have recently experienced a noise problem which was identified as a faulty part and repaired but this has prompted us to carry out more routine maintenance checks in order to ensure that the problem does not arise again.

B5 The investment made in the silo and pneumatic pumping system has resulted in significant environmental improvements as far as our manufacturing process is concerned both in terms of :

Depletion of Natural Resources	:	Reduced diesel consumption.
Loss of Biodiversity	:	Diesel - forklift and skips.
Benefit for Global Warming	:	Reduced CO ₂ emission through reduction in need for use of forklift trucks and skip lorries.
Local Noise Pollution	:	Reduction in engine noise for forklift trucks.
Depletion of Landfill Sites	:	Reduction in the need to dispose of 16,000 - 50 kg waste paper bags per annum (3500 kilos in weight).

With Compliments

ROBERT

Refractories Manufacturers & Suppliers

