FILE

City of Coventry

COVENTRY CITY COUNCIL

ENVIRONMENTAL PROTECTION ACT 1990, SECTIONS 8(8), 12

NOTICE OF REVOCATION

(64)

To: ***Hills Precision Components Limited***
PO Box 200
Humber Road
Stoke
COVENTRY
CV3 1LU

Coventry City Council ("the Council"), in exercise of the powers conferred on it by section 8(8), 12 of the Environmental Protection Act ("the Act"), hereby gives you notice as follows:

(for section 12(1) notices)

1. The authorisation reference **064** for the manufacture of polyurethane foam components at Hills Precision Components Ltd, PO Box 200, Humber Road, Stoke, Coventry, CV3 1LU, is hereby revoked with effect from **8th May 1997.**

Signed on behalf of Coventry City Council

[redacted]

.....

City Environment Officer
The officer appointed for that purpose

Date: 11 APR 1997

pol/ur0804sb

CERTIFICATE OF SERVICE BY HAND

I, Sophie Boaycote ..... being employed as an Envmntl Protectn officer ..... and Environ... of Co... certify that the Notice of ... a true copy was served ... to Mr D. D.U.C.kett.. of H.U.S. Precision, Humber Rd Coventry, on ..1.. th April ..19..97.....

Sign [redacted]

Your Reference :
Our Reference : EH/EP/DRP/fl
Please ask for : D R Packard
Direct Dialling No : 831856
Date : 4th August 1994

City of Coventry

HOUSING AND ENVIRONMENTAL SERVICES DIRECTORATE

Director Howard T. Farrand
Providing Housing, Environmental and Client Agency Services

Michael J. Green
City Environment Officer
Broadgate House
Broadgate
Coventry. CV1 1NH
Telephone : 0203 83 1832/34
Telecom Gold Mailbox : 76 : END042
Fax : 0203 83 1831

THE ENVIRONMENTAL PROTECTION ACT 1990

The Environmental Protection (Prescribed Processes and Substances) Regulations 1991, SI 472.

The Environmental Protection (Application, Appeals and Registers) Regulations 1991, SI 507.

Authorisation No: 064
Application Received: 19th October 1992

Notice is hereby given that under the Environmental Protection Act 1990 Coventry City Council (hereafter called the Authority) gives authorisation to:

Hills Precision Components Limited
P O Box 200
Humber Road
Stoke
Coventry
CV3 1LU

Register in England No: 2145693

For the manufacturer of polyurethane foam components as described on Page 2 and 5 at:

Hills Precision Components Limited
P O Box 200
Humber Road
Stoke
Coventry

Subject to the conditions specified on the attached pages, Nos 1 to 4, and within the process boundaries as indicated on Plan No. 1.

Signed [redacted] Dated 17th day of August 1994
City Environment Officer

1. DESCRIPTION OF PROCESS

1.1 This authorisation is for the manufacture of microcellular polyurethane foam components, as described in the Environmental Protection (Prescribed Processes and Substances) Regulations 1991, SI472, Section 6.2 Part B. Within the process boundary outlined in red on the attached Plan numbered 1 and specifically relates to the processes outlined below.

1.2 The delivery and storage of polyurethane prepolymers, resins and methylene chloride in sealed containers in the storage area marked raw material stores on the Plan numbered 1.

1.3 The injection moulding of components using Polyol resin and methyl di-isocyanate (approximately 1 tonne per week).

1.4 The high and low pressure premixing of polyol resins and methyl di-isocyannates with subsequent injection into closed moulding machines located as shown on the Plan numbered 2.

1.5 The use of methylene chloride to flush the mixing chamber on the low pressure mixing system and the cleaning of discharge guns.

1.6 Any change to the above descriptions must not take place without prior consent from this Authority.

2. EMISSION LIMITS AND CONTROLS

2.1 Emissions from the process shall only be discharged to atmosphere via the discharge points indicated on Plan 1. The stack will terminate at a height of 3m above the apex of the roof and the efflux velocity shall not be less than 15m/s.

2.2 All emissions to air shall be free from offensive odour outside the process boundary, as perceived by the local Authority Inspector.

2.3 There shall be no emissions of particulate matter noticeable beyond the process boundary.

2.4 The concentration of Methane di-isocyanate (MDI) in emissions to air must not exceed 0.02ppm ($0.1mg/m^3$).

2.5 All pollution concentrations shall be expressed at standard conditions of 273K and 101.2Kpa without correction for water vapour content.

2.6 The introduction of dilution air to achieve the emission concentration limits in this authorisation is not permitted. Exhaust flow rates should be consistent with the efficient capture of emissions.

3. MONITORING SAMPLING AND MEASUREMENT OF EMISSIONS

3.1 An olfactory assessment shall be carried out at least once a day from the position marked x on the Plan numbered 1.

3.2 The results of monitoring to comply with 3.1 shall be recorded in a log book. This shall include the date, time, wind strength and direction, the name of the observer and an assessment of the emissions. This log book shall be retained, on site, for a minimum of four years.

3.3 Any adverse results from the monitoring required in 3.1 shall be followed up immediately by the investigation of the cause of the emission and any corrective action taken, with this also being recorded in the log book.

3.4 A detailed record shall be kept of all organic solvents used in the prescribed processes. This shall include cleaning solvent usage and organic compounds used as foam blowing agents. This inventory shall be forwarded to the local Authority at least once every six months and shall include a determination for the total organic solvent usage for that period.

4. MATERIALS HANDLING

4.1 MDI and Polyols shall only be transported around the site in sealed containers via fork lift trucks.

4.2 The cleaning of mixing vessels using methylene chloride shall only be carried out while the extraction equipment serving the appropriate moulding machines are fully operational.

4.3 The mixing of prepolymers and resins shall only be carried out in the dedicated mixing equipment prior to injection into the mould cavity.

4.4 Injection of moulds shall only be carried out while the dedicated dry filter backed extraction equipment is fully operational.

4.5 All full, partially full and nominally empty containers which hold or have held materials which contain organic solvents must be stored in the raw material stores or the waste compound and have lidded containers.

4.6 Empty drums of MDI must be decontaminated with neutralisation solution as soon as practicable. These containers must not be lidded.

4.7 Waste resins or prepolymers must be suitably neutralised as soon as practicable. This shall be carried out in the waste compound area.

4.8 Suitable and adequate amounts of neutralisation agents shall be held in the stores at all times.

5. CHIMNEYS, VENTS AND PROCESS EXHAUSTS

5.1 Emissions from the injection of moulds shall only be emitted to atmosphere via the dedicated dry filter back extraction system fitted to each moulding machine.

6. GENERAL OPERATIONS

6.1 Any mechanical malfunction or spillage of material shall be attended to and remedied as soon as possible. Any incident likely to give rise to atmospheric emissions shall be noted in detail in the process log book as described in 3.3.

6.2 Any incidents likely to give rise to emissions which may have an impact on neighbouring residents shall be reported immediately to this Authority.

6.3 A copy of this authorisation shall be displayed so it can be conveniently read by persons having duties which are or maybe affected by this authorisation.

6.4 The operator shall supply, to this Authority, on demand and without charge, a copy of all or part of the monitoring records kept in accordance with this authorisation.

7. UPGRADING OF THE PROCESS

7.1 No later than twelve months from the date of this authorisation, a programme for upgrading the process shall be submitted to this Authority. The upgrading programme shall have regard to the Secretary of State's Guidance:

Di-isocyanate Processes PG 6/29 (92).

7.2 Any proposed methods for non-continuous emission sampling for the purposes of complying with the authorisation must be agreed in writing with this Authority.

SUPPLEMENTARY NOTES

THESE NOTES ARE NOT PART OF THE AUTHORISATION

1. Your attention is drawn to your obligation under Section 7(2) of the Environmental Protection Act 1990 to ensure that the best available techniques, not entailing excessive cost (BATNEEC) for:

   A) preventing the release of prescribed substances into the air or where that is not practicable by such means, for reducing the release into the air of such substances to the minimum and for rendering harmless any such substances that are so released

   and

   B) for rendering harmless any other substances which might cause harm if released into the air.

2. The authority for contact purposes should be taken to mean the head of the Environmental Protection Section, Tel 831810 during office hours, 832222 outside office hours.

3. You will note that condition 7.1 of the authorisation requires you to submit a schedule of works for approval by this Authority, within twelve months of the issue date. This schedule must describe the procedures and improvements that you intend to implement in order to meet the requirements of the relevant guidance note referenced within the authorisation. From observations and inspections of the process I would recommend that the following topics are specifically included.

   a) The results of non-continuous emission sampling of emissions from the extraction systems serving the polyurethane foam injection moulding machines to indicate what improvements, if any, are required.

   b) The proposed frequency of further monitoring, taking into account the results of the initial sampling exercise.

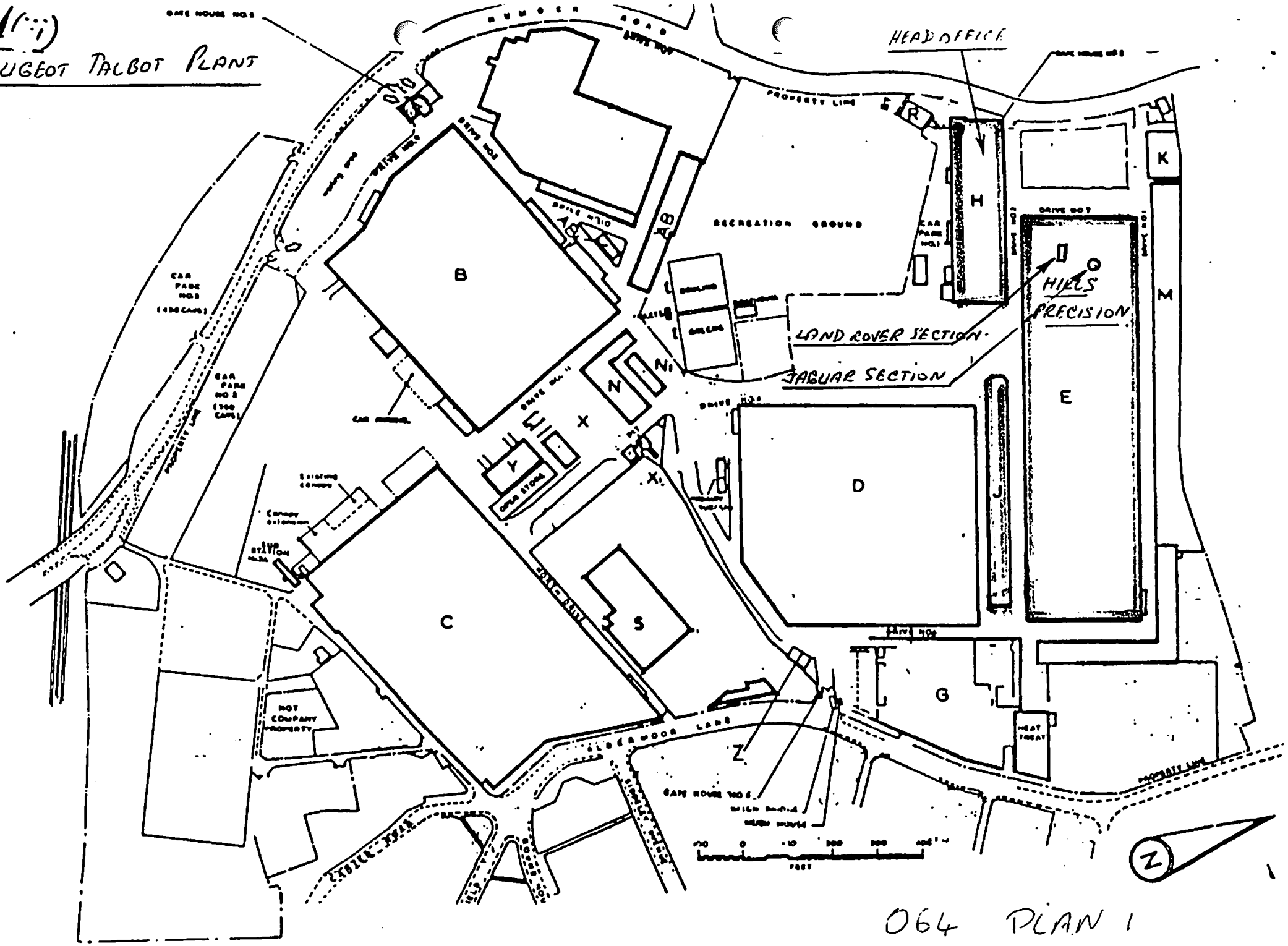
   c) The reduction of CFC based mould release agents.

   d) The adoption of a dedicated area for mixing waste resins or prepolymers prior to disposal.

epa/hills

Re 1(::i)

PEUGEOT TALBOT PLANT



064 PLAN 1

064

P.O. Box 200, Humber Road,
Stoke. Coventry CV3 1LU.

Tel: (0203) 635533
Telex: 31686
Fax: (0203) 535075

Ref DD/HJC

15th October 1992

Mr D Packard
Environmental Services Dept.,
Broadgate House
Broadgate
Coventry
CV1 1NH

Dear Mr Packard

Re. Application To Register Existing Di-Isocyanate Processes

Find attached the Companies application for the above as outlined in the ENVIRONMENTAL PROTECTION ACT 1990.

Yours Faithfully

[redacted].....
Mr D Duckett

580-00
008857.

Hills Precision Components Ltd

Environmental Protection Act 1990

Application Authorisation For Existing Di-isocyanate Processes Under Section 6 of the Environmental Protection Act 1990

1. Details of Operator and Location of Process

   i) Name and Address of Applicant (Registered Office)

   Hills Precision Components Ltd.,
   PO Box 200, Humber Road,
   Stoke,
   Coventry.
   CV3 1LU

   ii) Address of premises where the process will be carried out:-

   As above

   iii) Map showing Location of Premises where the process will be carried out:-

   See attached map.

   iv) Map showing detailed layout.

   See attached map.

   v) The section which most appropriately describes the applicants process as stated in Environmental Protection (prescribed processes & substances) Regulations 1991.

   - Section 6.2 - Di-isocyanate process.

2. Description of the Prescribed Process

   i) Raw materials used in the process

   - Polyol resin
   - Methyl di-isocyanate. (M.D.I)

   ii) Storage and handling procedures of raw materials

   - Storage in special purpose area in sealed containers.
   - Mix facility within stores area to counter-act settlement.

iii) Transportation of Materials within site Boundary.

- Transported in sealed containers to foaming station by fork lift truck.

iv) Physical and operational characteristics of the process

a) Low pressure mixing.(Landrover & Jaguar) Methylene Chloride is used to flush the mixing chamber every shot (15 grams) most of which is captured in a closed barrel but some vapour is drawn into the air extractor, to maintain a work area free of contamination.

b) High pressure mixing (Jaguar.)

- No solvents used.
- M.D.I and polyol in sealed, pressurised containers

v) Abatement Techniques utilised in the process

- Dry filter backed extraction.

vi) Final discharge points

See attached map.

vii) Storage and handling of final products and any waste materials

- Finished components held on racks prior to sub-assembly and packing in special stillages and cardboard boxes.
- Waste materials discharged into a steel barrel, identified and disposed of by registered waste disposal Company.

viii) Contingency plan to deal with process malfunction

- A neutralising agent held in the stores to apply on spillages of M.D.I.

3. Details of Scheduled Emissions from Prescribed Process.

- Existing Process.
- Results of measurement of emissions to be forwarded at a later date.

4. Proposals for Monitoring of Emissions

i) Visual and olfactory assessment.
ii) Type of inspection to plant and equipment
- Preventative Maintenance procedure inspects plant and equipment, in line with a schedule to monitor efficiency of extraction.

ENVIRONMENTAL PROTECTION ACT 1990, PART I
THE ENVIRONMENTAL PROTECTION (PRESCRIBED PROCESSES AND SUBSTANCES) REGULATIONS 1991, SI 472
THE ENVIRONMENTAL PROTECTION (APPLICATIONS, APPEALS AND REGISTERS) REGULATIONS 1991, SI 507

APPLICATION FOR AUTHORISATION UNDER SECTION 6 OF THE ENVIRONMENTAL PROTECTION ACT 1990

1. Process for which authorisation is sought

Di-Isocyanate Processes

2. (a) name, address and telephone number of applicant* (or address of applicant's principal place of business—for mobile plant)

Hills Precision Components Ltd.,
Po Box200, Humber Road,
Stoke,
Coventry CV3 1LU

(b) name, number and registered office of applicant company* *(if applicable)*

As Above

*the person/consultant who will operate the process, not eg the person/consultant who is writing the application on the operator's behalf

(c) address for correspondence (if different from a) or b) above)

As Above

3. Name and address of premises where process is or will be carried on *(not applicable to mobile processes)*

As Above

4. Name of local authority in whose area the process will be operated (or local authority area in which the operator has his principal place of business—for mobile plant)

As Above

5. List of maps or plans enclosed with the application showing the location of the premises where the process will be carried on.

Find attached - Map of Peugeot Talbot Plant and Local Roads Surrounding Hills Precision -Map of E Block Factory

Where the process is or will be carried on on only part of the premises whose address is given at 3 above, *either* describe which part of the premises *or* list the plan(s) which identifies these parts.

E Block - See attached plan

6. List of attached documents comprising part of the application **

Map of Peugeot Talbot Plant

Map of E Block (Hills Precision)

Cheque to value of £580.00

Application details

use continuation sheet if necessary)

**Regulation 2 of the Environmental Protection (Applications, Appeals and Registers) Regulations 1991 requires that all applications must include the following information (for guidance on these requirements see General Guidance Note No 3—"Secretary of State's Guidance: Applications and Registers", HMSO, 1991: ISBN 0 11 752425 5, £4):

—a description of the prescribed process

—a list of prescribed substances (and any other substances) which might cause harm if released into the air) which will be used in connection with, or will result from the carrying on of the prescribed process

—a description of the techniques to be used for preventing releases into the air of prescribed substances, for reducing such substances to a minimum and for rendering harmless any substances that are released

—details of any proposed release of such substances into the air and an assessment of the environmental consequences

—proposals for monitoring any release of such substances, the environmental consequences or any such release and the use of techniques for preventing etc releases

—the matters on which the applicant relies to establish that the objectives mentioned in section 7(2) of the Act will be achieved and that he will be able to comply with the condition implied by section 7(4) of the Act.

The applicant may also supply any other information he wishes the local authority to take into account in considering his application.

7. Name of newspaper in which it is proposed to advertise the application

Coventry Evening Telegraph

8. Fee enclosed *(cheques to be made payable to* Coventry City *Council)*

£.580.00

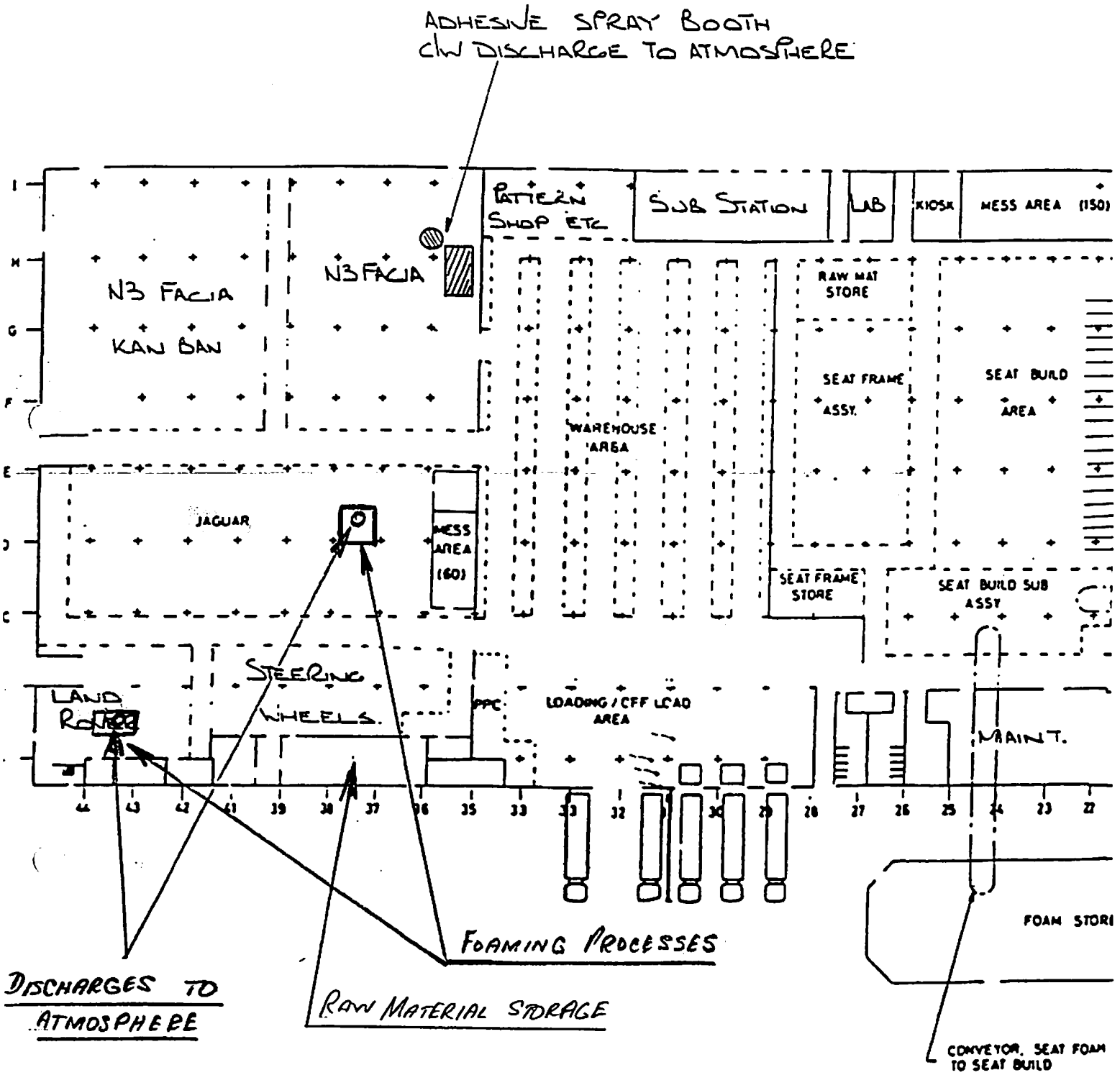
I hereby certify that all the information contained in this application is, to the best of my knowledge, correct

[redacted] (signature)

D.Duckett (name in BLOCK CAPITALS and capacity in which signing)

15.10.92 (date)

Re. 1(iv)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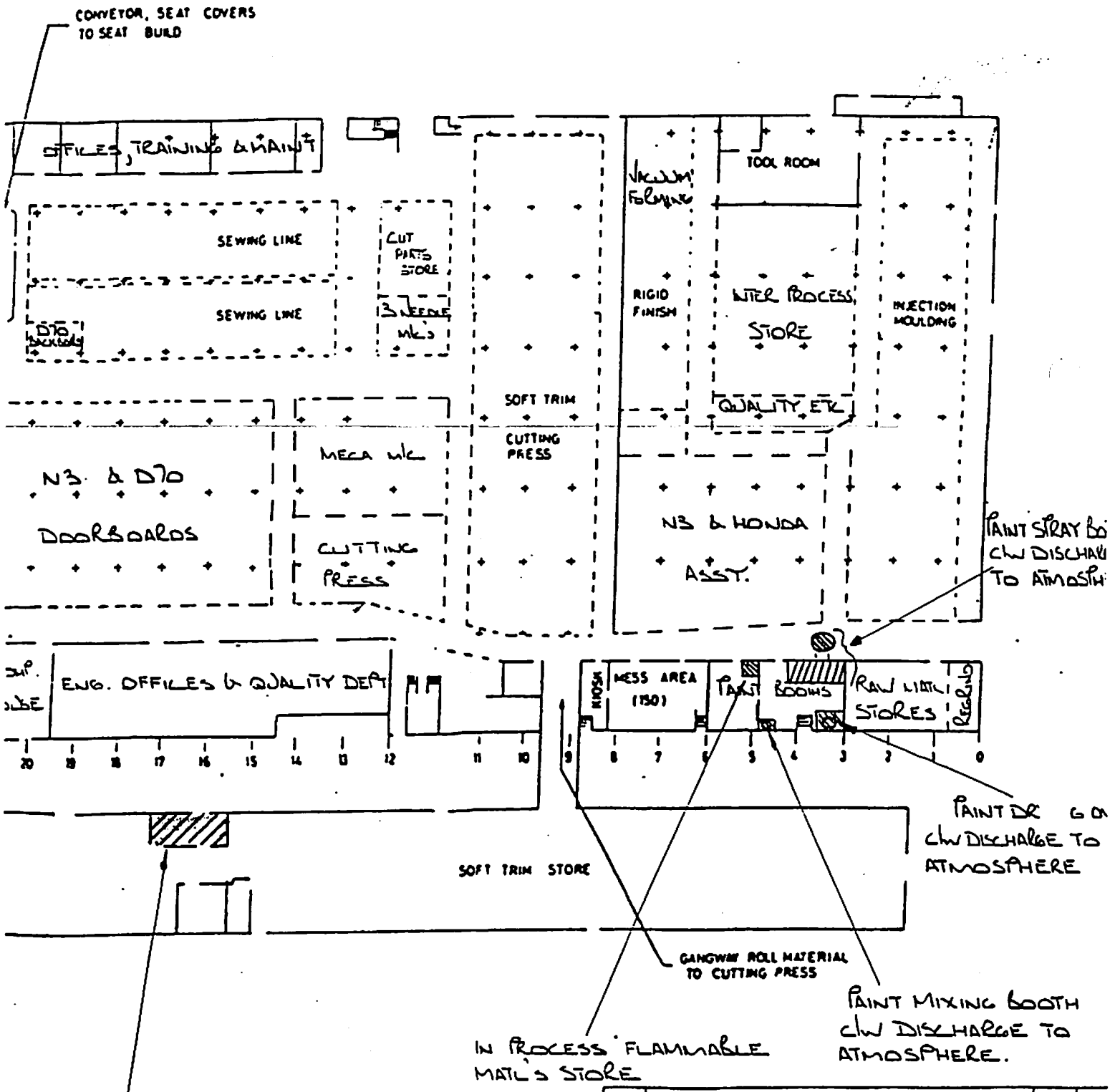
C/W DISCHARGE TO ATMOSPHERE
PATTERN SHOP ETC
SUB STATION
LAB
KIOSK
MESS AREA (150)
N3 FACIA
KAN BAN
N3 FACIA
RAW MAT STORE
SEAT FRAME ASSY.
SEAT BUILD AREA
WAREHOUSE AREA
JAGUAR
MESS AREA (60)
SEAT FRAME STORE
SEAT BUILD SUB ASSY
STEERING WHEELS
LAND ROVER
PPC
LOADING / OFF LOAD AREA
MAINT.
FOAM STORE
FOAMING PROCESSES
DISCHARGES TO ATMOSPHERE
RAW MATERIAL STORAGE
CONVEYOR, SEAT FOAM TO SEAT BUILD

BILL OF MATERIAL



HILLS PRECISION

FACILITIES ENGINEERING
MANUFACTURING ENGINEERING

1st/3rd ANGLE PROJECTION

DRN BY P. HARRIS
DATE 27/7/89

GENERAL BLOCK LAYOUT

STOKE PLANT

Re 1(iii)

PEUGEOT TALBOT PLANT