POLLUTION PREVENTION & CONTROL ACT 1999
Environmental Permitting (England and Wales) Regulations 2010

Document A
Environmental Permit

Trelleborg PPL Ltd.
Reference Number **PPC/195**

Coventry City Council ("the Council") in accordance with Section 13(1) of the Environmental Permitting (England & Wales) Regulations 2010 ("The Regulations"), hereby permits:

Trelleborg PPL Limited (Company registration no: 04226233)

Whose registered office is:

Trelleborg PPL Limited
International Drive
Tewkesbury Business Park
Tewkesbury
Gloucestershire
GL20 8UQ

To operate a Part B installation involving the use of 5 tonnes or more of di-phenyl-methane-di-isocyanate, as prescribed in Section 4.1 Part B (a) of Schedule 1 to The Regulations, at:

Trelleborg PPL Limited
Units 1 & 8
Curriers Close
Canley
Coventry
CV4 8AW

The permit is subject to the conditions specified in this document consisting of 17 pages and comprising documents A, B and Appendix 1 Plans PPC/195/A/B/C.

Signed.....

Sara Roach – Assistant Director of Public Safety & Housing
A person authorised to sign on behalf of the Council

Dated ……

SCOPE

The installation comprises not just any relevant unit carrying out a Part B activity listed in Schedule 1 to the Regulations, but also directly associated activities which have a technical connection with that activity and which could have an effect on pollution.

Technical Guidance documents used in the preparation of this document:

- Secretary of State's Guidance for Di-isocyanate Processes PG6/29(12)
- Secretary of State's Guidance – General Guidance Manual on Policy and Procedures for A2 and B installations (Defra April 2012).

Date annual fee required: 1st April of each financial year

Date for full Compliance: Date permit issued

Permit prepared by: Steven Dewar

LEGISLATION

1. Pollution Prevention and Control Act 1999.
2. The Environmental Permitting (England & Wales) Regulations 2010 (hereafter referred to as "The EP Regs.").

Definitions referred to in this permit

- An **Activity** is an industrial activity forming part of an installation. Different types of activity are listed within Schedule 1 of the EP Regulations and are broadly broken down into industrial sectors. Other "associated" activities may also form part of an installation.
- An **Installation** comprises not just any relevant unit carrying out a B activity listed within Schedule 1 to the EP Regulations, but also directly associated activities which have a technical connection with a schedule 1 activity and which could have an effect on pollution.
- An **Operator** is the person (e.g. a company or individual) who has control over the operation of an installation.
- **Authorised Officer** shall mean an officer authorised to carry out duties under the Pollution Prevention and Control Act 1999 and subordinate regulations
- **Logbook** shall mean any electronic or paper means of storage of the required information as agreed by the regulator
- **Regulator** shall mean Coventry City Council.
- **Organic solvent** shall mean any VOC which is used alone or in combination with other agents, and without undergoing a chemical change, to dissolve raw materials, products or waste materials, or is used as a cleaning agent to dissolve contaminants, or as a dissolver, or as a dispersion medium, or as a viscosity adjuster, or as a surface tension adjuster, or a plasticiser, or as a preservative.
- **Volatile organic compound (VOC)** shall mean any organic compound having at 293K a vapour pressure of 0.01 kPa or more, or having a corresponding volatility under the particular conditions of use.
- **Stack** includes structures and openings of any kind from or through which substances may be emitted to air.
- **Duct** includes enclosed structures through which gaseous substances may be conveyed.
- **Process vent** includes open terminations of ducts.
- **"m"** means metre
- **"m/s"** means metres per second
- **Due diligence** the use of these words in the odour boundary condition means that there shall not be a breach of the condition if the operator can show that he/she employed the BAT. Accordingly, any emission of offensive odour where the operator can show that he/she employed BAT ought not to give rise to the Regulator issuing proceedings against the operator for the breach of an odour boundary condition.
- **Best Available Techniques (BAT)** In relation to any aspect of the process not regulated by specific conditions in this permit, then Best Available Techniques shall be used:

  For the purposes of the Environmental Permitting (England & Wales) Regulations 2010 "best available techniques" means the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing in principle the basis for emission limit values designed to prevent and, where that is not practicable, generally to reduce emissions and the impact on the environment as a whole; and for the purpose of this definition –

a) “available techniques” means those techniques which have been developed on a scale which allows implementation in the relevant industrial sector, in the economically and technically viable conditions, taking into consideration the cost and advantages, whether or not the techniques are used or produced inside the United Kingdom, as long as they are reasonably accessible to the operator;

b) “best” means, in relation to techniques, the most effective in achieving a high general level of protection of the environment as a whole;

c) “techniques” includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

d) Further guidance can be obtained from the Secretary of State’s Guidance - Environmental Permitting General Guidance Manual on Policy and Procedures for A2 and B Installations.

Description of Installation

The location of the permitted installation is shown on the attached plan PPC/195/A and the installation boundary (and odour monitoring points) are marked in red on the attached plan PPC/195/B. The internal layout of the production area is shown on the attached schematic diagram PPC/195/C.

The process manufactures solid polyurethane elastomeric products namely railway dampers; by the reaction of di-isocyanates with polyols in moulds.

Some products contain metal inserts where low solvent water-based primers (bonding agents) are used to enable the polyurethane to adhere to them.

Some solvent based release agents are used to prevent polyurethane adhering to the mould tools during casting. No catalysts and blowing agents are used in the process.

The process includes storage of diphenyl methane di-isocyanate (MDI) and polyols which are supplied in a mix of 5L, 25L, 205L or 1 Tonne IBC's which are stored in the PU system storage area marked on PPC/195/C. All raw materials are stored internally at ambient temperature.

Grit blasting of steel inserts takes place in the grit blasting unit in the left hand portion of the unit, marked on plan PPC/195/C. The unit is vented externally (after emissions have passed through a bag filtration system). The unit is maintained and serviced and does not require emissions testing due to low particulate emissions.

Steel inserts are attached onto magnetic holders at the beginning of the conveyor line which then runs through an "air knife" which blasts compressed air over the metal inserts to clean any dust off the surfaces.

The conveyor then runs into a spray booth (Marked "Bonding agent Spray & Dry" on Plan PPC/195/C) where an electrostatic process is used to coat the metal inserts with a low solvent water-based primer (called "Silent Track Primer WB, see MSDS sheet) this is so that the metal insert bonds with the surrounding polyurethane elastomer. The spray booth extracts via a vent to atmosphere which requires testing annually for volatile organic compounds (See Table 1 in Conditions, Section 1.0 below). The frequency of future emissions testing may be reduced depending on the emissions monitoring results.

With the containers sealed, the polyols and isocyanates rolled to ensure even mixing.

Continuing along the conveyor mould tools (moulds) are lightly coated with a mould release agent or a polished wax coating, all mould tools contain metal inserts for the railway dampers.

The polyols and MDI are then combined in dispensing equipment to produce rapidly gelling polyurethane (PU) which is injected from a machine via a dispensing head into various mould tools depending on the job specification. Occasionally hand mixing is used if the required mix quantity is small.

The polyol & isocyanate components are dispensed into the mould. The dispensing equipment automatically mixes these at the dispensing head at the required pre-set ratio. Gel time varies but is generally between 3mins-6mins. The mould tool progresses along the conveyor and passes through a heater. The PU moulding is air cured inside the building. The heater does not initiate the cure. The heater blows warmed air over the

mouldings to break surface tension to allow air to escape from the casting without causing pitting or bubbling on the surface.

The dispensing head is kept clean of any residual polyurethane by continuously circulating polyol between dispensers. When necessary (due to a gradual skinning build up) the head is removed and soaked in a small amount of Methylene Chloride overnight. A small amount (5 litres) is stored in the unit for this purpose.

Product curing is left to occur at ambient temperature over several hours or days depending on the product (a minimum of 8 hours). Then continued curing may take place anywhere within the factory and subsequent full cure properties are achieved at normal atmospheric conditions over a period of between 2 and 7 days.

Cast parts are then de-moulded in the area marked "Cleaning and Releasing" at the top edge of the plan PPC/195/C. Products are released from moulds and then knife trimmed and cut as necessary in the general workspace or the mould release area. The "Cleaning and Releasing" area marked on the plan is vented to atmosphere via a filter (a full glass wool filter set) and requires annual extractive testing for volatile organic compounds and particulate matter (See Table 1 in Conditions, Section 1.0 below). The frequency of future emissions testing may be reduced depending on the emissions monitoring results. Continuous indicative monitoring may be required depending on the levels of particulate matter emitted.

Parts are checked for hardness and visual acceptance and passed for packing & despatch. Parts are packaged in a manner appropriate to the part and customer requirements. They can be palletised, shrink wrapped, boxed, crated or a mix of these.

DOCUMENT B
CONDITIONS

All conditions shall have immediate effect unless stated otherwise.

1.0 EMISSION LIMITS AND CONTROLS

1.1 All emissions to air, other than condensed water vapour, shall be free from persistent visible emissions and droplets.

1.2 All emissions to air shall be free from offensive odour outside the installation boundary, as perceived by the Regulator. It shall not be a breach of the condition if the operator can show that he or she took all reasonable steps and exercised all due diligence to prevent the release of offensive odour (see definition of terms for explanation of due diligence).

1.3 There shall be no emissions of particulate matter noticeable beyond the installation boundary.

1.4 The following emissions to atmosphere shall not be exceeded (see table 1 below):

(a) Di-isocyanate as total NCO group 0.1 mg/Nm^3 averaged over any 2-hour period whilst plant is in operation
(b) VOC (expressed as total carbon excluding particulate matter) 100 mg/Nm^3 as 30 minute mean.
(c) Particulate matter 50 mg/m^3 when measured by either continuous quantitative or indicative monitoring during normal operation.

Table 1
List of Process Areas within the Installation and Associated Emission Points and Pollutants of Concern

Area/Machinery Identification & Emission Point	Pollutants Emitted	Emission Limit in Permit	Abatement Plant Required
Grit blasting unit	Potential particulate matter	2.1, 2.2, 2.3	Particulate filters & continuous indicative monitoring
Bonding Agent Spraybooth & Cleaning and releasing area	VOC	1.4(b)	None
Cleaning and releasing area	Di-Isocyanates & Particulate matter	1.4(a) 1.4(c)	1.4(a) None 1.4(c) Bag filters and extraction unit

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

1.6 Emissions from combustion processes shall in normal operation be free from visible smoke. During start up and shut down the emissions should not exceed the equivalent of Ringelmann Shade 1 as described in British Standard BS 2742: 2009.

1.7 All appropriate precautions shall be taken to minimise emissions during start ups and shutdowns.

2.0 MONITORING, SAMPLING AND MEASUREMENT OF EMISSIONS

2.1 A visual assessment of emissions from all process vents including the grit blasting unit and the stacks to the bonding agent spray booth and the cleaning and releasing area shown on plan PPC/195/C shall be carried out at least once a day from suitable positions where all of the vents and stacks are clearly visible.

2.2 A visual assessment of particulate matter shall be made frequently and at least once daily outside the site boundary and at the locations marked A and B on the attached plan PPC/194/B whilst the process is in operation. The time, location, wind direction and result of these assessments shall be recorded and records kept on site.

2.3 Assessments of odour from the activity shall be made frequently and at least once each day outside the site boundary and at the locations marked A and B on the attached plan PPC/194/B whilst the process is in operation. The time, location, wind direction and result of these assessments shall be recorded and records kept on site.

2.4 Adequate sampling ports shall be provided in accordance with the British or equivalent standards for the two stacks serving the bonding agent spray booth and the cleaning and releasing area shown on plan PPC/195/C. These must be adequate to enable emissions testing to be undertaken to meet conditions 2.5 and 2.6 below.

2.5 Emissions from the stack serving the cleaning and releasing area shown on plan PPC/195/C shall be tested for **di-isocyanates** within 8 weeks of the issue of this permit and thereafter once every 12 months. This shall be undertaken in accordance with MDHS 25/3 (HSE Method for determination of hazardous substances: Organic Isocyanates in air) or an alternative test standard agreed with the Regulator. The emission limit value quoted in condition 1.4(a) shall not be exceeded.

2.6 Emissions from the two stacks serving the bonding agent spray booth and the cleaning and releasing area shown on plan PPC/195/C shall be tested for **volatile organic compounds** within 8 weeks of the issue of this permit and thereafter once every 12 months. The test shall be carried out in accordance with the relevant British Standard or equivalent standard as agreed with the Regulator. The emission limit value quoted in condition 1.4(b) shall not be exceeded.

2.7 Emissions from the stack serving the cleaning and releasing area shown on plan PPC/195/C shall be tested annually for **particulate matter** within 8 weeks of the issue of this permit and thereafter once every 12 months. The test shall be carried out in accordance with the relevant British Standard or equivalent standard as agreed with the Regulator. The emission limit value quoted in condition 1.4(b) shall not be exceeded.

2.8 The efflux velocities of each stack shall also be tested and recorded during the emissions monitoring exercise.

2.9 All pollutant concentrations shall be expressed at reference conditions of 273K and 101.3 kPa, without correction for water vapour content.

2.10 If monitoring is not in accordance with the main procedural requirements of the relevant standard or British Standard, deviations shall be reported as well as an estimation of any error involved.

2.11 The Authority shall be notified 7 days in advance of any periodic monitoring to demonstrate compliance with conditions 1.4, 2.5, 2.6, and 2.7. This notification shall include the provisional date, and time of the monitoring, pollutants to be tested, and the method to be used.

2.12 The results of the monitoring to demonstrate compliance with conditions 1.4, 2.5, 2.6, and 2.7 shall be forwarded to the Regulator within 8 weeks of the monitoring taking place.

2.13 The results of monitoring to comply with conditions 2.1, 2.2 and 2.3 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.

2.14 Any adverse results from the monitoring required in conditions 2.1, 2.2 and 2.3 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.

2.15 A detailed record shall be kept of all organic solvents used in the process. This shall include any cleaning solvent usage, primers, adhesive solvent usage and diluent solvent usage. This inventory shall be forwarded to the local Authority at least once every 12 months and shall include a determination of the total organic solvent usage for that period.

2.16 If the total solvent usage exceeds 5 tonnes during any 12 month period, the Regulator shall be notified in writing as soon as possible, or within 14 days of the likely exceedance.

3.0 OPERATIONAL CONTROLS

3.1 Polyols and isocyanate materials (MDI) shall be stored appropriately and measures put in place to ensure that any spillages are contained that are likely to arise in the case of damage or incidents involving containers. Also refer to conditions 3.17 and 5.9

3.2 Methylene chloride used for cleaning shall be stored in closed containers either in bunded areas or on bunded pallets capable of holding 110% of the material stored on it.

3.3 IBC's shall only be permitted to be accessed by authorised and trained personnel.

3.4 When in use any drums containing polyurethane components shall be stored on suitable stands.

3.5 Primers shall be applied by spraying directly onto the inserts in the designated spraybooth.

3.6 The tanks and feed lines for polyol and isocyanate shall be correctly connected to prevent cross contamination between materials.

3.7 The component materials shall be transferred from the tanks and throughout the mixing and injection system through sealed pipe work or feed lines using compressed air and/or suitable pumps.

3.8 Any spillages of isocyanate materials or polyols shall be cleaned up immediately and any contaminated materials shall be held in vented, labelled containers.

3.9 Polyols and MDI shall be combined in dispensing equipment and then either poured or injected into the applicable moulds.

3.10 Hand mixing of polyols and MDI shall be permitted for the mixing of small quantities. The hand mixing of polyols and MDI shall not be used for large quantities of either in excess of 50 litres. Hand mixing of polyols and MDI shall take place inside the main building production area but not in the vented bonding area.

3.11 The cleaning of dispensing heads using methylene chloride shall be carried out and the used cleaning solvent collected.

3.12 The dry curing of products shall take inside the main building production area only and not outdoors.

3.13 The release of products from moulds and the cutting and trimming of finished products shall take place either inside the designated area for cleaning and releasing or in the main factory area.

3.14 The mould tool cleaning and releasing shall take place in the cleaning and releasing area.

3.15 The main roller shutter door of the main building shown on plan PPC/195/C shall be kept closed when not in use. Where this is not possible, when they are in use for deliveries and movements of materials, or due to hot weather, then the doors may be opened for workplace ventilation providing sufficient daily odour monitoring is undertaken as detailed in condition 2.3 above.

3.16 Used and dirty cleaning solvents shall be collected in suitable sealed containers and stored in suitable bunded areas or on bunded pallets capable of holding 110% of the material stored on it.

3.17 Spillage kits containing mobile bunds, drain covers, absorbent materials, and isocyanate decontaminant solution shall be provided at suitable locations in the production area. If any of the kit components are removed they shall be replaced as soon as is practicable.

3.18 Any waste component materials shall be stored in lidded containers within the production area.

3.19 Any waste component materials covered with dust or unreacted component materials which are stored externally (outside the production area) shall be double bagged in impermeable polythene bags before placing in a covered container.

4.0 STACKS, DUCTS AND PROCESS VENTS

4.1 The external stacks serving the bonding agent spray booth and the cleaning and releasing area shall be maintained at their existing heights and shall not be fitted with caps, cowls or other restrictive devices.

4.2 The efflux velocity of each stack in 4.1 shall achieve an efflux velocity of 15m/sec.

4.3 The stacks and ductwork shall have adequate insulation to minimise the cooling of waste gases, and prevent liquid condensation by keeping the temperature of the exhaust gases above the dewpoint.

4.4 Suitable inspection panels will need to be installed on existing ductwork within 2 months of the date of this permit as agreed with the Regulator and any new ductwork when fitted to enable the proper internal inspection of ductwork.

5.0 GENERAL OPERATIONS

5.1 Operators shall put in place some form of structured environmental management system (EMS), whether by adopting published standards (ISO 14001 or the EU Eco Management and Audit Scheme [EMAS]) or by setting up an EMS tailored to the nature and size of the particular process.

5.2 Staff at all levels shall receive the necessary training and instruction in their duties relating to control of the activities and emissions to air. The training of all staff with responsibility for operating the activity shall include:

- awareness of their responsibilities under the Permit; in particular how to deal with conditions likely to give rise to emissions, such as in the event of spillage;
- minimising emissions on start up and shut down; and
- action to minimise emissions during abnormal conditions.

5.3 The operator shall maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment. These documents shall be made available to the regulator on request and be retained by the operator for up to 2 years.

5.4 Spares and consumables in particular those that are subject to continual use or wear shall be held on site or shall be available at short notice. Such plant or equipment shall not be used unless that plant or equipment is capable of working in accordance with the conditions of this permit.

5.5 Cleaning operations, cleaning techniques and cleaning substances shall be reviewed annually to identify:

- Steps which could be eliminated or automated;
- Substances which can be substituted;
- The technical and economic feasibility of changing to different cleaning solutions.

5.6 Flues and ductwork shall be inspected regularly (at least every 6 months) and cleaned as necessary to prevent accumulation of materials within ductwork as

part of the routine maintenance programme. Records shall be kept of inspections and cleaning carried out.

5.7 A full schedule of key abatement and extraction plant shall be provided to the Regulator within 2 months of this permit being issued.

5.8 A written programme for preventative maintenance on all pollution control equipment shall be provided and implemented within 2 months of this permit being issued.

5.9 A written procedure for dealing with spillages shall be agreed with the regulator within 2 months of this permit being issued.

5.10 Any incident likely to give rise to adverse atmospheric emissions or emissions that may have an impact on the local community shall be notified to the Regulator immediately, and the details of incident including remedial action taken recorded in the process log book.

5.11 Any failure of exhaust ventilation shall be recorded together with corrective action taken, with this also being recorded in the log book.

5.12 The operator shall make available on demand and without charge any of the records required to be kept by this permit.

5.13 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 (see definitions for explanation of BAT).

5.14 If the operator proposes to make a change in operation of the installation, he must, at least 14 days before making the change, notify the regulator 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.

END OF PERMIT CONDITIONS

DOCUMENT C
RESIDUAL DUTY

In relation to any aspect of the process not regulated by specific conditions in this permit, then Best Available Techniques shall be used:

For the purposes of the Environmental Permitting (England & Wales) Regulations 2010 "best available techniques" means the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing in principle the basis for emission limit values designed to prevent and, where that is not practicable, generally to reduce emissions and the impact on the environment as a whole; and for the purpose of this definition –

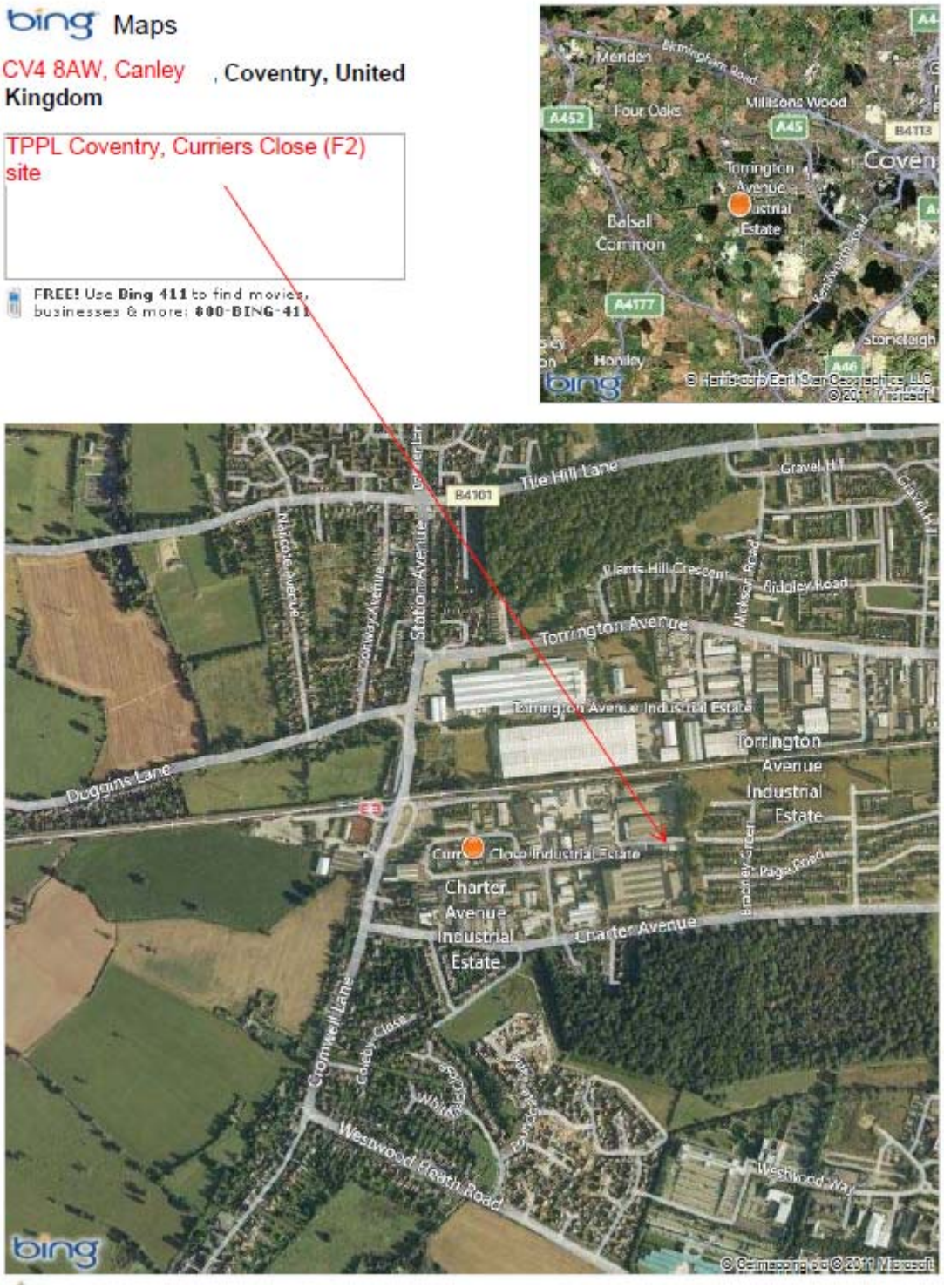
e) "available techniques" means those techniques which have been developed on a scale which allows implementation in the relevant industrial sector, in the economically and technically viable conditions, taking into consideration the cost and advantages, whether or not the techniques are used or produced inside the United Kingdom, as long as they are reasonably accessible to the operator;

f) "best" means, in relation to techniques, the most effective in achieving a high general level of protection of the environment as a whole;

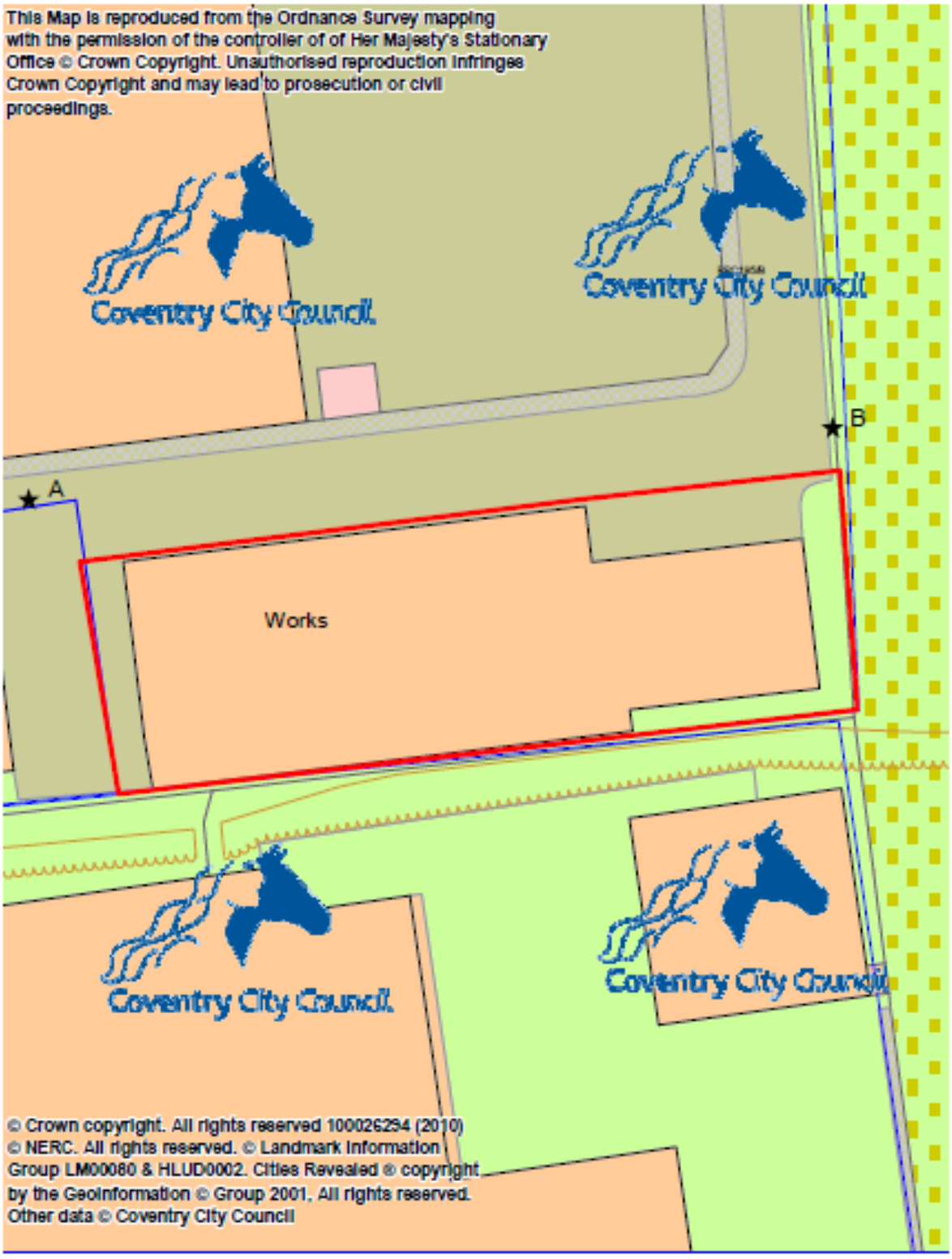
g) "techniques" includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

h) Further guidance can be obtained from the Secretary of State's Guidance - Environmental Permitting General Guidance Manual on Policy and Procedures for A2 and B Installations.

APPENDIX 1
INSTALLATION LOCATION PLAN PPC/195/A

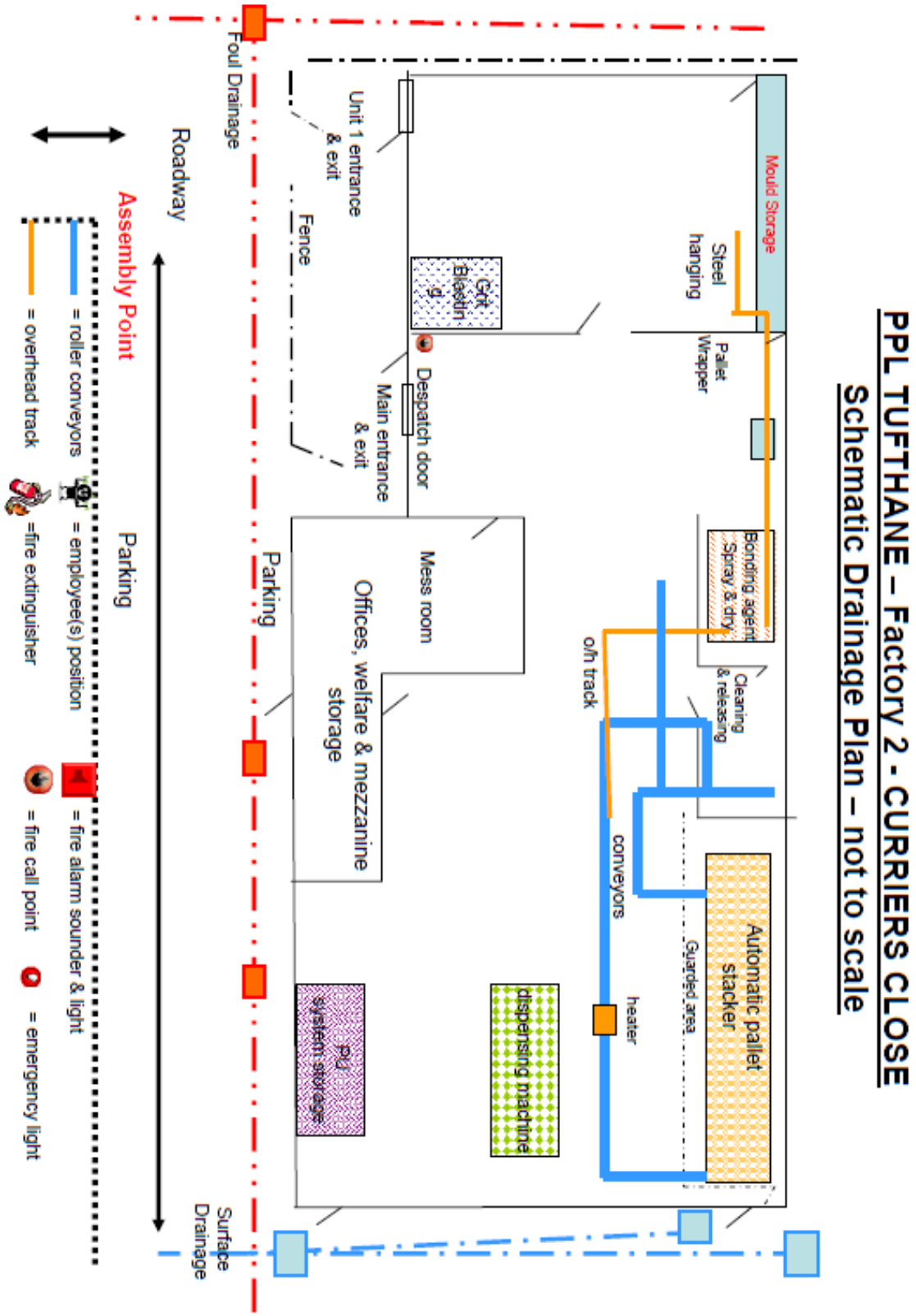


INSTALLATION BOUNDARY PLAN PPC/195/B



Community Services Directorate, Environmental Health,
Coventry City Council Room 314,
Broadgate House, Coventry, CV1 1NH
Tel: 0500 834 3333
Fax: 024 7683 1840

Coventry City Council


PPL TUFTHANE – Factory 2 - CURRIERS CLOSE
Schematic Drainage Plan – not to scale
Foul Drainage
Roadway
Unit 1 entrance & exit
Fence
Mould Storage
Steel hanging
Pallet Wrapper
Grit Blastin g
Despatch door
Main entrance & exit
Bonding agent Spray & dry
Cleaning & releasing
o/h track
conveyors
Automatic pallet stacker
Guarded area
heater
dispensing machine
PU system storage
Mess room
Offices, welfare & mezzanine storage
Parking
Parking
Assembly Point
Surface Drainage
= overhead track
= roller conveyors
= employee(s) position
=fire extinguisher
= fire alarm sounder & light
= fire call point
= emergency light

SUPPLEMENTARY NOTES

These notes do not comprise part of the Permit but contain guidance relevant to the Permit.

Inspections and Powers of Entry

Regular inspections will be carried out by officers of the Council (the Local Authority Inspectors) to check and ensure full compliance with the Permit conditions and residual duties. These inspections may be carried out without prior notice.

Under section 108(6) of the Environment Act 1995 authorised Local Authority Inspectors have been granted powers of entry into any premises for the purposes of discharging relevant duties.

Reviews

The Local Authority has a statutory duty to review the permit at least once every 6 years or in the following circumstances set out in Regulation 34(1) of the Environmental Permitting (England and Wales) Regulations 2010:

a) The pollution from the installation is of such significance that the existing emission limit values for the permit need to be revised or new emission limit values need to be included in the permit
b) Substantial changes in BAT make it possible to reduce emissions from he installation or mobile plant significantly without imposing excessive costs; or
c) Operational safety of the activities carried out in the installation or mobile plant requires other techniques to be used

Health and Safety

This Permit is given in relation to the requirements of the Environmental Permitting (England and Wales) Regulations 2010. It must not be taken to replace any workplace responsibilities the operator has under Health & Safety legislation. Whenever emission limits quoted in this Permit conflict with occupational exposure limits set under the Health and Safety at Work Act 1974 to secure the health, safety or welfare of persons at work, the tighter limit should prevail. The Installation must be operated in order to protect persons at work as well as the environment. In achieving conditions in this Permit the operator must not adopt any course of action that would put at risk the health, safety or welfare of persons at work.

Other Statutory Requirements

This Permit does not detract from any other statutory requirement, such as the need to obtain planning permission, hazardous substances consent, discharge consent from the Environment Agency, building regulations approval, or a waste disposal licence.

This Permit does not authorise a contravention of any other enactment or any order made, granted or issued under any enactment, nor does it authorise a contravention of any rule or breach of any agreement. The Operator is advised to consult the relevant Planning Department regarding changes that may be required as a result of this Permit (e.g. stack heights) as they may require planning permission.

Transfer of Permits

Where the operator of an installation wishes to transfer, in whole or in part, his permit to another person, the operator and the proposed transferee shall jointly make an application to the regulator to effect the transfer. Such an application shall be accompanied by the permit and any fee prescribed in respect of the transfer.
In the case of partial transfer, where the original operator retains part of the permit, the application must make clear who will retain control over the various parts of the

installation. The application must include a plan identifying which parts of the site and which activities the operator proposes transferring.

The local authority will then determine whether to allow the transfer within a two-month period, unless the local authority and the applicants agree a longer period.

Where the local authority approves the transfer, the transfer will take effect from the date requested by the operator or a date that may be agreed by the local authority and the applicants.

Variation to Permits

Variation to permits may be initiated either by the local authority or the operator, either in response to changes in the operation of an installation or if new conditions are needed to deal with new matters. Variations may be required in response to the following.

- In response to the findings of a periodic review of conditions.
- In response to the findings of an inspection.
- New or revised sector guidance notes

The operator should apply to the Local Authority in order to vary a permit under Regulation 20(1) of the Regulations. The application must be in writing and, in accordance with Part 1 of Schedule 5 to the Regulations contain:

- The name, address and telephone number of the operator.
- The address of the installation.
- A correspondence address.
- A description of the proposed changes.
- An indication of the variations the operator would like to make.
- Any other information the operator wants the authority take account of.

Substantial Change

A substantial change means, in relation to an installation, a change in operation, which in the opinion of the local authority may have significant negative effects on human beings or the environment.

Where the local authority deems that a proposed variation constitutes a substantial change, the operator will be informed of the process to follow.

Noise

This Permit does not include reference to noise. Statutory noise nuisance is regulated separately under the provisions of Part III of the 1990 Act.

Appeals

An Appeal can be made against the conditions in, or variations to this Permit as per Part IV of the Regulations. Appeals are made to the Planning Inspectorate who acts on behalf of the Secretary of State. Appeals against conditions within a Permit must be submitted within 6 months of the date of issue of the permit.

Appeals against variation notices must be submitted within 2 months of the date of issue of the notice. Appeals should be despatched on the day they are dated and sent to:

The Planning Inspectorate
Environment Team, Major and Specialist Casework
Room 4/19 – Kite Wing
Temple Quay House, 2 The Square
Temple Quay
BRISTOL
BS1 6PN