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

DOCUMENT A : PERMIT

NP Aerospace Ltd

Reference Number **PPC/189**

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

NP Aerospace Ltd

Whose registered office is:

473 Foleshill Road
Coventry
CV6 5AQ

To operate a Part B installation involving surface cleaning, as prescribed in Chapter 7 of Schedule 1 to The Regulations and a Di-isocyanate Process under chapter 4.1 part B, in respect of the operation of the installation at:

Unit 3 Central City Industrial Estate
Red Lane
Coventry
CV6 5RY

The permit is subject to the conditions specified in this document consisting of 16 pages and comprising documents A, B, C and plans PPC/189/A and PPC/189/B.

Signed.....

Sara Roach - Assistant Director Public Safety
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 States Guidance Note PG6/45 (04) –Surface Cleaning
- Secretary of States Guidance Note PG6/23 (04) –Coating of Metal and Plastic Processes
- Secretary of State's Guidance – General Guidance Manual on Policy and Procedures for A2 and B installations. ISBN 0-85521-028-1

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

Date for full Compliance: **Date permit issued**

Permit prepared by: Tamsin Williams
Permit checked by: Neil Chaplin

LEGISLATION

1. Pollution Prevention and Control Act 1999.
2. Environmental Permitting (England & Wales) Regulations 2010

BRIEF DESCRIPTION OF THE INSTALLATION REGULATED BY THIS PERMIT

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 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 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 (eg 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
- **Local Authority** shall mean Coventry City Council

The general location of the Permitted Process is shown on the attached plan PPC/189/A in addition to the installation boundary that is marked in red. The internal layout of the premises is shown on the attached plan PPC/189/B.

Description of Installation

NP Aerospace (UK) Ltd assembles and constructs armoured vehicles for military and civilian use. Within this process the site uses di-isocyanate containing surface coatings and solvents in the preparation and assembly of composite armour plating.

Specifically, machined metal armour plating is degreased using hand applied acetone on a flat bed for the removal of residual oils, greases and glues prior to the application of adhesives and further composite layers.

This is a Solvent Emissions Directive surface cleaning activity as defined in Schedule 1, Section 7 Part B, of the Environmental Permitting (England and Wales) Regulations 2007 using over 2 tonnes of organic solvent in a 12 month period.

Additionally, composite vehicle armour panels are spray coated with a proprietary two pack polyurethane coating which contains di-isocyanate. Coating of components is within a dry backed paint spraying booth, fitted with filtered extraction that discharges to air.

This is an activity involving organic chemicals as defined in Schedule 1 Section 4.1 Part B of the Environmental Permitting (England and Wales) Regulations 2010 using over 5 tonnes or more of any di-isocyanate.

Table 1

List of Process Areas within the Installation and Associated Emission Points, Pollutants of Concern and Abatement Plant Required

Row Number	Area/Machinery Identification	Pollutants Emitted	Emission Limit in Permit	Abatement Plant Required
1	Stack A1 Degreasing and surface cleaning of machined metal armour plating (using acetone)	VOC	75 mg/Nm^3	Filtered Extraction
2	Stack A2 Paint Spraying in Industrial Spray Booth	Di-isocyanate	0.1 mg/Nm^3	Filtered Extraction
3	Stack A2 Paint Spraying in Industrial Spray Booth	Particulate Matter	50 mg/Nm^3	Filtered Extraction

DOCUMENT B
CONDITIONS

All conditions shall have immediate effect unless stated otherwise.

EMISSION LIMITS AND CONTROLS

1 All releases to air, other than condensed water vapour, shall be free from persistent visible emissions.

2 All emissions to air shall be free from droplets

3 There shall be no offensive odour beyond the site boundary, as perceived by the regulator.

4 All appropriate precautions must be taken to minimise emissions during start-up and shut-down.

5 The following emission concentration limits shall apply to releases to atmosphere from contained sources:

VOC	75 mg/m^3
Di-isocyanate	0.1 mg/m^3
Total Particulate Matter	50 mg/m^3

MONITORING, SAMPLING AND MEASUREMENT OF EMISSIONS

6 Visual and olfactory assessments of emissions should be made at least once each day when the process is in operation. The time, location and result of these assessments shall be recorded.

7 Non continuous emissions monitoring of particulate matter shall be carried out according to the main procedural provisions of BS ISO 9096:2023, with averages taken over operating periods excluding start up and shut down.

8 Emission monitoring of isocyanates should be carried out in accordance with HSE occupational method MDHS 25/3 or Draft EPA method 207-1.

9 Determination of the mass concentration of total gaseous organic carbon in flue gases from organic solvent using processes should be carried out using the continuous flame ionisation detector method EN 13526.

10 The reference conditions for the limits given in condition 5 are 273.15K, 101.3kPa, without correction for water vapour content, unless stated otherwise.

11 All results obtained from annual monitoring shall not exceed the emission concentration limit specified in Condition 5, except where:

(a) data is obtained over at least 5 sampling hours in increments of 30 minutes or less; or

(b) at least 20 results are obtained where sampling time increments of more than 30 minutes are involved,

In these circumstances the following apply:

(a) no daily mean of all 30 minute mean emission concentrations should exceed the specified emission concentration limits during normal operation (excluding start up and shutdown)
(b) no 30 minute mean emission concentration should exceed twice the specified emission concentration limits during normal operation (excluding start up and shut down)

12 The operator should notify the regulator at least 7 days before any periodic monitoring exercise to determine compliance with emission limit values. The operator should state the provisional time and date of monitoring, pollutants to be tested and the methods to be used.

13 The results of any non-continuous emission testing shall be forwarded to the regulator within 8 weeks of the completion of the sampling.

14 Adverse results from **any** monitoring activity (both continuous and non-continuous) should be investigated by the operator as soon as the monitoring data has been obtained/received. The operator should:

- Identify the cause and take corrective action
- Record as much detail as possible regarding the cause and extent of the problem, and the action taken by the operator to rectify the situation
- Re-test to demonstrate compliance as soon as possible; and
- Notify the regulator

15 The introduction of dilution air to achieve the emission concentration limit must not be permitted.

16 The operator shall keep records of inspections, tests and monitoring, including all non-continuous monitoring, inspections and visual assessments. In such cases:

- Current records shall be kept on site and made available to the regulator to examine
- Records shall be kept by the operator for at least two years

17 The process operator should provide a list of key abatement plant and should have a written plan for dealing with its failure, in order to minimise any adverse affects.

18 In the case of malfunction or breakdown leading to abnormal emissions, the operator must;

- Investigate immediately and undertake corrective action
- Adjust the process or activity to minimise those emissions; and
- Promptly record the events and actions taken.

19 The regulator must be informed without delay:

- if there is an emission that is likely to have an effect on the local community
- in the event of the failure of key abatement plant.

20 The operator should ensure that adequate facilities for sampling are provided on vents or ducts.

21 Sampling points on new plant should be designed to comply with the British or equivalent standards.

DISPERSION OF CONTAINED EMISSIONS

22 Adequate insulation shall be provided to minimise the cooling of waste gases and prevent liquid condensation by keeping the temperature of the exhaust gases above the dew point.

23 Stacks and ductwork shall be cleaned to prevent accumulation of materials, as part of the routine maintenance programme

24 Stacks or vents shall not be fitted with any restriction at the final opening such as a plate, cap or cowl, with the exception of a cone which may be necessary to increase the exit velocity of the emissions.

MATERIALS HANDLING AND PROCESSING

25 Drums of organic solvents shall be stored in a secure and well ventilated storage area. This storage area shall be bunded, and shall be capable of holding at least 110% of the capacity of the largest organic solvent storage vessel contained within.

26 All vessels or containers containing organic solvents, including coatings containing VOC shall be lidded or enclosed when not in use and the period that the vessel or container is opened for use shall be kept to a minimum.

27 All potentially odorous waste materials shall be stored in suitable closed containers or bulk storage vessels, where appropriate vented to suitable abatement plant.

28 All measures should be taken to minimise VOC emissions during mixing i.e. the use of covered or closed mixing vessels

29 Emissions from the emptying of mixing vessels and transfer of materials shall be adequately contained, preferably by the use of closed transfer systems. This may be achieved by the use of closed mobile containers, containers with close fitting lids, or, preferably, closed containers with pipeline delivery.

30 Prior to disposal, empty drums and containers contaminated with organic solvent shall be closed to minimise emissions from residues during storage prior to disposal and labelled, so that all handling them are aware of their contents and hazardous properties.

31 Nominally empty drums or drums containing waste contaminated with VOC awaiting disposal shall be stored in accordance with the requirements for full or new containers.

32 All reasonably practicable efforts should be made to minimise the amount of residual organic solvent bearing material left in drums and other containers after use. All organic solvent contaminated waste shall be stored in closed containers.

33 Prior to disposal, used wipes and other items contaminated with organic solvent shall be placed in a suitably labelled metal bin fitted with a self closing lid.

34 Dry sweeping of dusty materials shall not be permitted.

CLEANING OPERATIONS

35 Cleaning operations involving organic solvents shall be periodically reviewed, normally at least once every two years, to identify opportunities for reducing VOC emissions. The operator shall be provided with a report on the conclusions of the review.

36 Where machine cleaning is impractical, manual cleaning may take place and will lead to fugitive emissions.

- Emissions should be contained and vented and abated, if appropriate. Emissions must comply with the requirements of the emission limit specified in Condition 5.

37 Cleaning solvents should be dispensed by piston type dispenser or similar contained device, when used on wipes.

38 Where practicable, fixed equipment shall be cleaned in situ, and such equipment shall, where practicable, be kept enclosed whilst cleaning is carried out.

39 Where equipment is cleaned off line using organic solvents, cleaning shall be carried out using enclosed cleaning systems, wherever possible. Enclosed cleaning systems shall be sealed to prevent emissions whilst in operation, except during purging at the end of the cleaning cycle. If this is not practicable, emissions shall be vented to abatement plant where necessary.

40 Suitable organic solvent containment and spillage equipment shall be readily available in organic solvent handling areas.

41 Cleaning of particulate matter arrestment plant, coating application plant, and extract ductwork which may contain finely divided materials, shall be carried out so as to minimise emissions into the air.

42 All spillages shall be cleared as soon as possible; solids by vacuum cleaning, wet methods, or other appropriate techniques.

METAL DEGREASING AND CLEANSING

43 Where practicable, cleaning fluids that do not contain organic solvent, or cleaning fluids with significantly less volatile organic solvents shall be used (with or without the addition of mechanical, chemical or thermal enhancements) (Note: HSE guidance shall be sought prior to any substitution of existing cleaning fluids).

44 Where manual cleaning with solvents is unavoidable:

- cleaning solvents shall be kept in enclosed containers whilst not in active use,
- wiping cloths or brushes shall be either pre-impregnated or using a dispenser or similar device, be impregnated with cleaning solvent in a controlled manner,
- used wiping cloths or brushes shall be stored in enclosed containers pending recovery or disposal.

45 Oil and grease contamination of parts to be cleaned shall be minimised by:

- Spin off excess oils or grease prior to use of cleaning solvents
- Longer drain times between machining and cleaning of components
- Careful stacking of components prior to cleaning to reduce oil retention

GENERAL OPERATIONS

46 A high standard of housekeeping shall be maintained.

47 Spares and consumables shall be held on site, or shall be available at short notice from guaranteed suppliers, so that plant breakdowns can be rectified rapidly.

48 A written maintenance programme shall be available to the regulator with respect to pollution control equipment. A record of such maintenance shall be made available for inspection by the regulator.

ENVIRONMENTAL MANAGEMENT SYSTEMS AND TRAINING

49 The process operator shall ensure that adequate management systems are devised and maintained to ensure compliance with this Permit. These systems may involve the adoption of recognised published standards such as ISO 14001 or EMAS, or alternatively may comprise a system devised in-house.

50 Training of all staff with responsibility for operating the process/ activity shall include:

- Awareness of their responsibilities under the permit, in particular how to deal with conditions likely to give rise to VOC emissions, such as in the event of spillage
- Minimising emissions on start up and shut down
- Action to minimise emissions during abnormal conditions.

51 The operator shall keep 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.

RECORDS AND DOCUMENTATION

52 All records and documentation referred to in this Permit shall be recorded in an easily retrievable format. These records shall be retained by the operator for a minimum of two years and shall be made available to the Regulator for inspection upon request. A summary of these documents is as follows:

- Results of all non-continuous monitoring
- Quantity of solvent use
- Maintenance programme and maintenance records
- Details of any malfunction/breakdown incorporating the cause, effect and any corrective action taken
- Management systems

53 The operator shall notify the Regulator at least 28 days in advance of any modification to the activity, including ancillary operations within the boundary, or any change in the manner of operation, other than routine maintenance or the fitting of standard replacement parts. Written approval shall be obtained prior to any such change or modification.

54 The installation operator shall notify the Regulator at least 28 days in advance of any intention to cease the operation of all or part of the installation.

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 –

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.

SUPPLEMENTARY NOTES

These notes do not comprise part of the Permit PPC/189 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

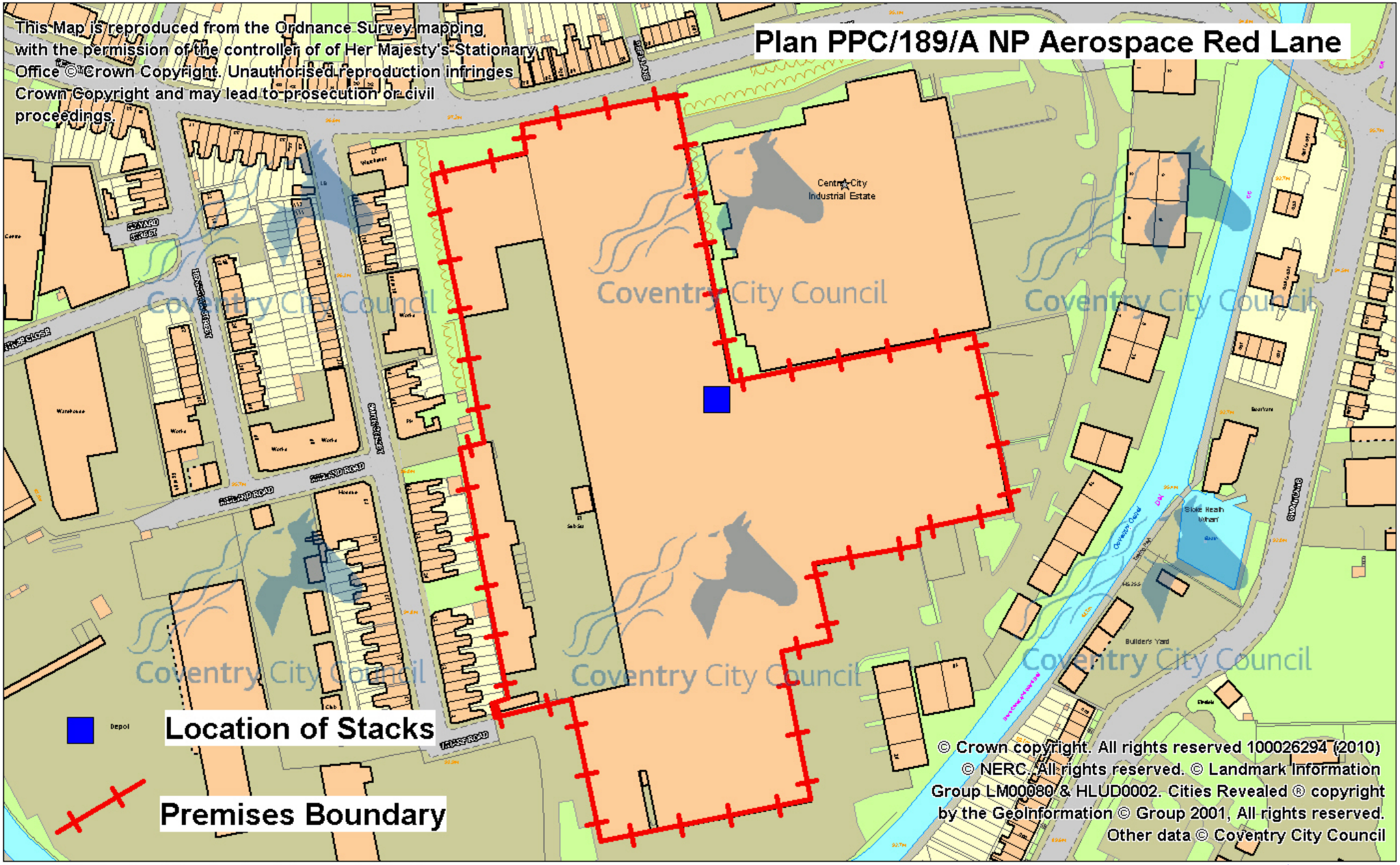
An Appeal can be made against the conditions in, or variations to this Permit as per Part IV of the Regulations. Appeals are made to the Planning Inspectorate who acts on behalf of the Secretary of State. Appeals against conditions within a Permit must be submitted within 6 months of the date of issue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

HMSO Publications

All HMSO publications can be ordered by telephone on Tel: 0870 600 5522, Fax: 0870 600 5533 or e-mail: book.orders@tso.co.uk



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

Plan PPC/ 189/B NP Aerospace Red Lane- Location Of Release Points

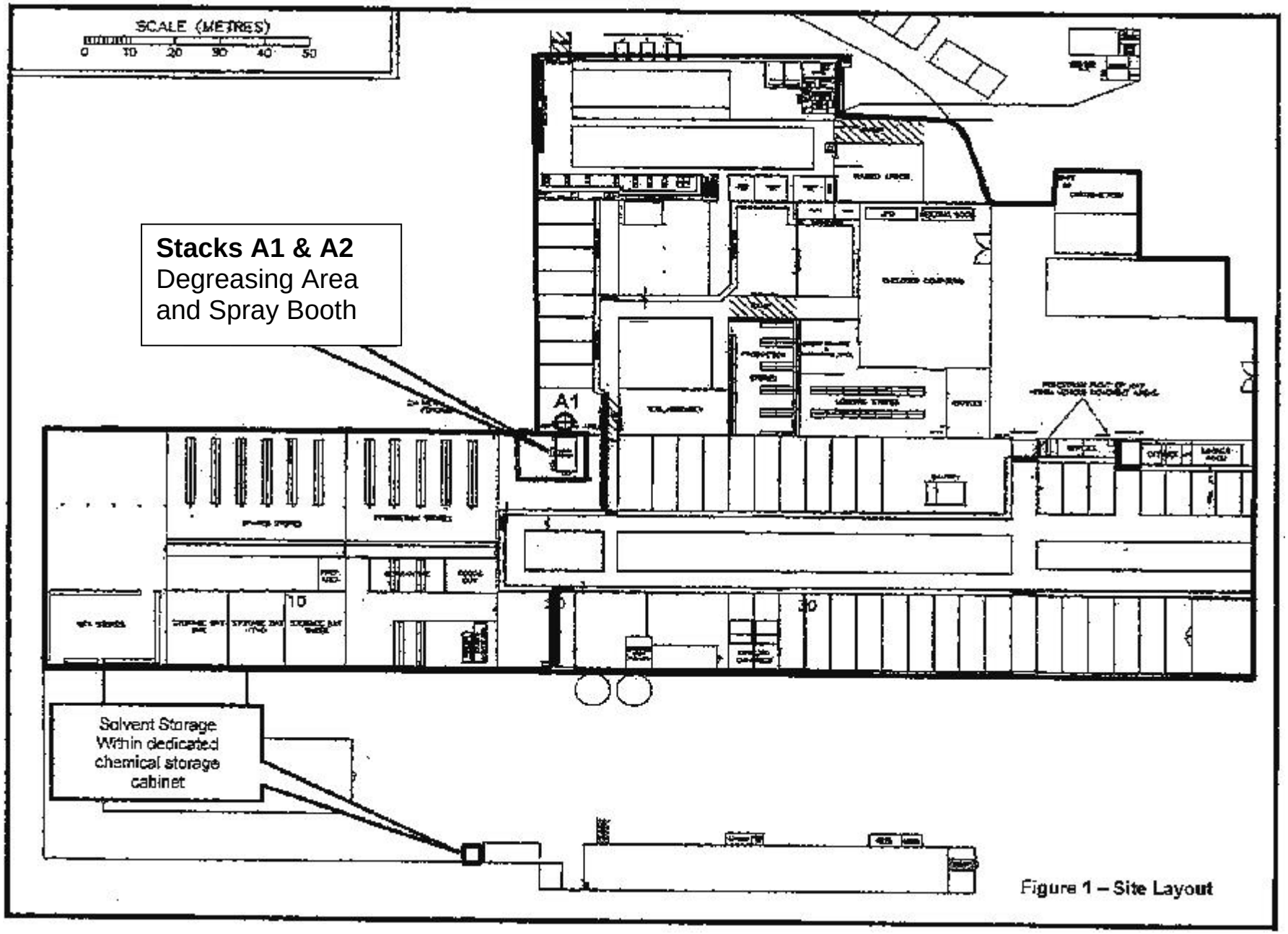


Figure 1 – Site Layout