PERMIT REFERENCE: PPC / 006
Webster Hemmings & Sons Ltd

Pollution Prevention and Control Act 1999
Pollution Prevention and Control (England and Wales) Regulations 2000 as amended

Process Address	274 Stoney Stanton Road, Coventry CV6 5DJ
Process Type	Brick Manufacturer
Current Operator	Webster Hemmings & Sons Ltd
Previous Operator	n/a
Date of Application	1st April 2004
Date Permit Issued	16th August 2004

POLLUTION PREVENTION & CONTROL ACT 1999
POLLUTION PREVENTION & CONTROL (ENGLAND AND WALES) REGULATIONS 2000

DOCUMENT A : PERMIT

WEBSTER HEMMING & SONS LTD

Reference Number **006**

Coventry City Council ("the Council") in accordance with Section 10(2) of the Pollution Prevention & Control (England and Wales) Regulations 2000 ("The Regulations"), hereby permits:

WEBSTER HEMMING & SONS LTD

Whose registered office is:

274 Stoney Stanton Road
Coventry
CV6 5DJ

This permit is for the manufacturing of ceramic products by firing in kilns as described in the Pollution Prevention and Control (England and Wales) Regulations 2000, SI 2000 No. 1973, Section 3.6 Part A (2) paragraph (a), at

274 Stoney Stanton Road
Coventry
CV6 5DJ

The permit is subject to the conditions specified in this document consisting of 12 pages and comprising documents A, B and C, plans PPC/006/1 and PPC/006/2

[redacted].....
Alan Bennett, Head of Environmental Health
A person authorised to sign on behalf of the Council

Dated ……12/08/2004…….

SCOPE

The installation comprises not just any relevant unit carrying out a Part A(2) 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.

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

Technical Guidance documents used in the preparation of this document:

- Secretary of States Guidance Note IPPC SG7 – A2 Ceramics Sector
- 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:	Matthew Pegg
Permit Checked By:	Rachel King

LEGISLATION

1. Pollution Prevention and Control Act 1999.
2. Pollution Prevention and Control Regulations 2000 as amended, schedule 1 as amended

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 PPC 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 A2 activity listed within Schedule 1 to the PPC 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.
- **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.
- **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
- **"m"** means metre
- **"m/s"** means metres per second

The general location of the permitted installation is marked in red on the attached plan PPC/006/2. The Installation boundary is marked in red on the attached plan PPC/006/1.

Description of Installation

The key steps that take place within the process are:

The delivery, storage, handling and mixing of raw materials principally including Eturia Marl (clay) and Lignosulphinate additive which along with the addition of water from the mains supply forms the final product.

The moulding, pressing, extruding of material via mechanical plant operated on a conveyor system to form the shaped brick product as required.

Air drying of raw materials producing bricks ready for firing.

The firing of materials in 3 fibre lined kilns each with a capacity of 24000 bricks and an arch roof kiln with a capacity of 12500 bricks. The three fibre lined kilns are each fired by 6 high velocity 14 therm gas burners with exhaust gases being discharged via two updraught chimneys, the arch roof kiln is fired by 10 6 therm gas burners with exhaust gases being discharged through a 200 foot high Hoffman chimney.

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	Intermittent Kiln 1 (Discharge Flues A & B)	Particulates, CO, NOX, HF, SOX	Particulates – No visible Emission	None
2	Intermittent Kiln 2 (Discharge Flues C & D)	Particulates, CO, NOX, HF, SOX	Particulates – No visible Emission	None
3	Intermittent Kiln 3 (Discharge Flues E & F)	Particulates, CO, NOX, HF, SOX	Particulates – No visible Emission	None
4	Intermittent Kiln 4 (Discharge via Hoffman chimney)	Particulates, CO, NOX, HF, SOX	Particulates – No visible Emission	None

Key to Pollutants Emitted:

Particulates – Dust

CO – Carbon Monoxide

NOX – Oxides of Nitrogen

HF – Hydrogen Fluoride

SOX – Oxides of Sulphur

DOCUMENT B

CONDITIONS

All conditions shall have immediate effect unless stated otherwise.

1.0 EMISSIONS TO AIR, LIMITS AND CONTROLS

1.1 All emissions to air, other than steam or water vapour shall be colourless and free from persistent mist. All emissions to air shall be free from persistent fume and free from droplets.

1.2 Emissions from the kiln discharge flues marked A, B, C, D, E, F and the Hoffman Kiln Chimney on plan PPC/006/1 shall, in normal operation, be free from smoke and in any case shall not exceed the equivalent of Ringleman Shade 1, as described in British Standard BS2742:1969.

1.3 A visual assessment of emissions from the kiln discharge flues marked A, B, C, D, E, F and the Hoffman Kiln Chimney on plan PPC/006/1 shall be carried out at least once per day during drying and firing operations.

1.4 The results of monitoring to comply with clause 1.3 shall be recorded in the process log book to include the date and time of the assessment, an estimation of wind speed and direction, weather conditions, an assessment of emissions and the name of the observer. The log book shall be retained on site for a minimum of 2 years and be made available to the Local Authority Inspector on request.

1.5 Any adverse results from the monitoring required in clause 1.3 shall be investigated immediately and remedial action taken. The adverse results noted and the remedial action taken shall be recorded in the process log book outlined in 1.4.

1.6 The weekly net rated thermal input of the kiln in megawatts (MW) shall be calculated on a monthly basis and records of this calculation shall be retained on site for a minimum of 2 years, being made available to the Local Authority Inspector on request.

1.7 The calculation shall include the types of fuel used, the calorific values of the fuels, densities of the fuels (where appropriate), and the volume of fuels used in each weekly period, with supporting data from the suppliers in the form of invoices or delivery notes.

1.8 Where the calculations required by clause 1.6 indicate that the net rated thermal input of the kiln has exceeded 2 MW in any weekly period the operator shall notify the Local Authority in writing within 7 working days of the calculations being undertaken.

1.9 A summary of the data required by clause 1.6 shall be submitted to the Local Authority once in every 12 month period to include the average weekly net rated thermal input of the kiln in megawatts, and identify any weekly period where the net rated thermal input exceeded 2MW.

2.0 EMISSIONS OF NOISE, LIMITS AND CONTROLS

2.1 Emissions of noise from the installation shall not in the opinion of the Local Authority Inspector cause noise disturbance to nearby noise sensitive premises.

2.2 All reasonable steps, as assessed by an authorised officer of the Council, shall be taken to prevent or minimise releases of noise and vibration affecting nearby noise sensitive premises.

3.0 EMISSIONS TO LAND, LIMITS AND CONTROLS

3.1 There shall be no leakage of fork lift truck fuel oil, barium carbonate or lignosulphinate to land on the site. If leakage outside the bunded areas should occur action should be taken to contain the existing leakage and prevent further leakage. The local authority should be contacted at the earliest opportunity.

3.2 No material which adversely affects the state of the site outlined in the information which was reported to the Council, as part of the Site Reports submitted as part of the application for this permit, shall be deposited onto or into land.

3.3 All areas where there are Storage tanks containing liquids whose spillage could have an adverse effect on the environment shall be contained using a construction designed and maintained to prevent the release of liquids to land or water upon leaks or spillage. All bunding provided for this purpose shall be:

a) designed to capture spillage's from tanks and associated fittings including delivery connections,
b) resistant and impermeable to the stored liquids;
c) have associated pipe work routed within bunded areas without penetration of contained surfaces
d) have a capacity of 110% of the largest tank.

3.4 All drummed raw materials shall be inspected for leakage upon delivery and any leakage identified shall be dealt with immediately in order to minimise the release of liquid to land and/or water.

3.5 The Operator shall notify the Council, as soon as practicable, of any information concerning the state of the site which affects or updates that provided to the Council as part of the Site Reports, submitted with the application for this Permit.

4.0 EMISSIONS TO WATER, LIMITS AND CONTROLS

4.1 No emission from the Permitted Installation shall give rise to the introduction into groundwater of any substance specified in List I of the Groundwater Regulations 1998 (S.I. 1998 No. 2746).

5.0 ENERGY USE

5.1 The operator shall meet the requirements of the Climate Change Levy agreement outlined for Facility Number WBSTER ETR COMPLIANCE ACCOUNT No GB-00003005-C.

5.2 The operator shall produce a report each year on the energy consumption of the installation. This report shall be sent to the Local Authority.

5.3 The operator shall have an energy management plan which shall be updated annually shall be submitted to the Local Authority.

5.4 In the event that the Permitted Installation ceases to be covered by a Climate Change Agreement or the EU Emissions Trading Scheme National Allocation Plan, the Operator shall provide written notification to the Council within one month of such cessation.

6.0 OPERATIONAL CONTROLS

6.1 Stockpiles of clay awaiting processing shall be stored in the stockpiling area marked on plan PPC/006/1 and shall be kept moist by the use of water sprays, or shall be kept sheeted, where necessary to prevent visible dust emissions.

6.2 All reasonable steps in the opinion of the Local Authority Inspector shall be taken within the installation boundary to minimise the deposits of mud on dust on the public highway by vehicles leaving the installation.

7.0 STACKS, DUCTS AND PROCESS VENTS

7.1 Emissions from the kiln and dryers shall only be discharged to atmosphere via the discharge flues marked A, B, C, D, E, F and the Hoffman Kiln Chimney on plan PPC/006/1.

8.0 GENERAL OPERATIONS

8.1 Before commencement of first use all sources of clay used in the manufacture of kiln fired products shall be sampled by a competent person to quantify the quantities of chlorides, sulphides and fluorides present in a given quantity of clay. The results of this chemical analysis shall be forwarded to the Local Authority within eight weeks of the commencement of use of the clay.

8.2 The Local Authority shall be notified of the use of any new source of clay in writing within 2 weeks of the commencement of its' use. Any new source of clay shall be subject to the testing requirements of clause 8.1.

8.3 Records of preventative maintenance including inspections and any works undertaken shall be kept on site and made available to the local authority inspector on request.

8.4 Staff at all levels shall receive the necessary training and instruction in their duties relating to control of the activities and emissions to air. Records shall be kept which details all relevant training provided to staff, and these records shall be kept for a minimum of 2 years.

8.5 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 local authority immediately, and the details of incident including remedial action taken recorded in the process log book.

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

8.7 If there is any intention to change any aspect of the prescribed installation from the description contained in this permit, or any other aspect which may affect the substances or concentration or amount of substances being emitted to atmosphere, the operator shall notify the regulator of the proposed changes at least 4 weeks in advance before the changes take place.

9.0 Site Surrender and Decommissioning

9.1 Before this Permit can be wholly or partially surrendered, an application to surrender the Permit has to be made. For the applicant to be successful, they would have to be able to demonstrate to the Council, in accordance with Regulation 19 of the PPC Regulations, that there is no pollution risk and that no further steps are required to return the site to a satisfactory state

9.2 The operator shall within 12 months from the date of issue of this permit unless otherwise agreed in writing with the Council, provide details of the actions to be taken to return the site to a satisfactory state on site closure. The actions proposed should be accompanied by details of those responsible for the individual actions. This plan should be submitted to and agreed by the Local Authority.

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 Pollution Prevention and Control (England and Wales) Regulations 2000, "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 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.

SUPPLEMENTARY NOTES

These notes do not comprise part of the Permit PPC/ 006 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 15 of the Pollution Prevention and Control regulations 2000:

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 Pollution Prevention and Control (England and Wales) Regulations 2000. 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.

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.

- Change of operation of the installation. (The operator shall notify the local authority under Section 16(1) of the Regulations.)
- 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 17 of the Regulations. The application must be in writing and, in accordance with Part 1 of Schedule 7 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.

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

Environmental Appeals Administration
Room 4/19 – Eagle 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

Emission Monitoring Protocol

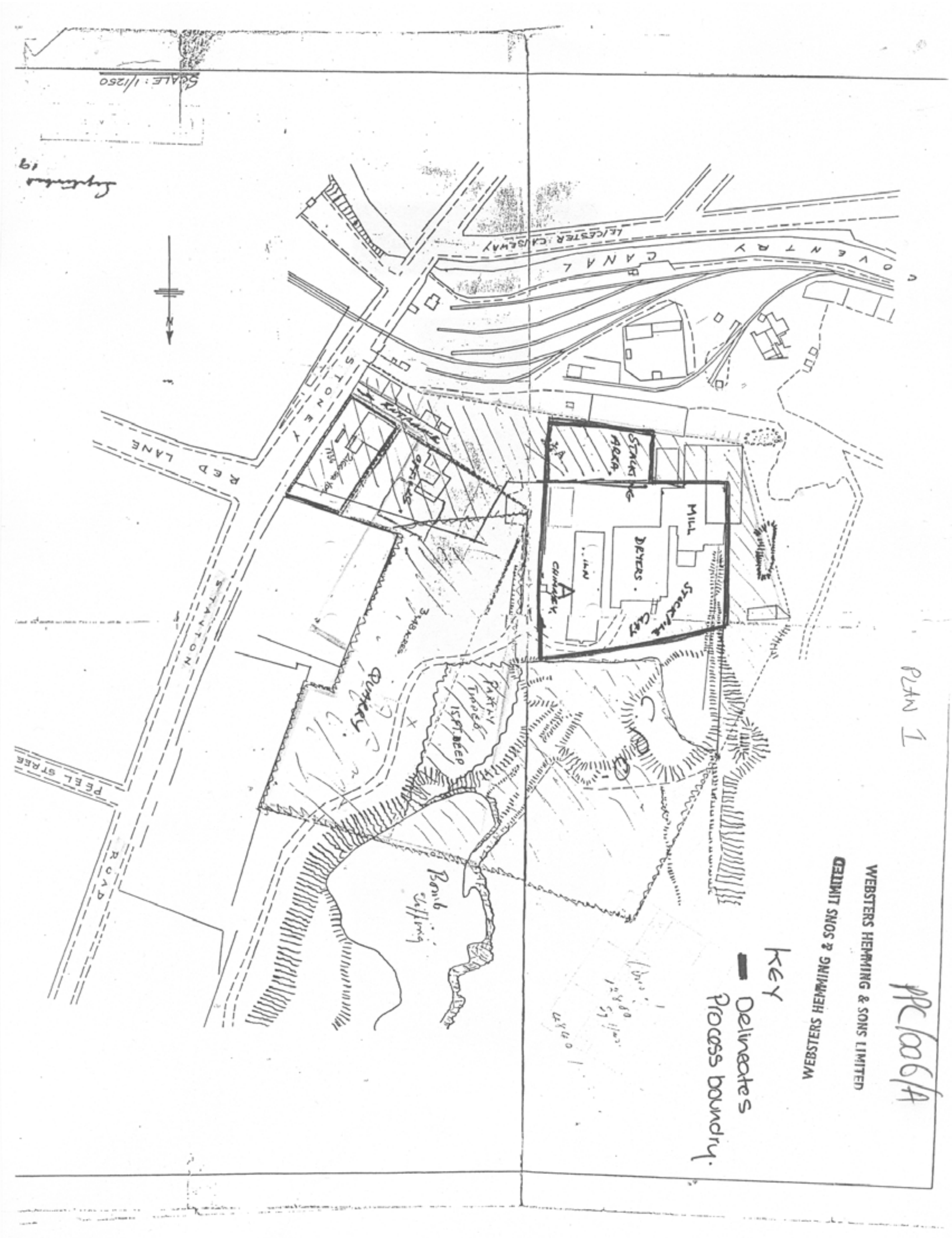
The documented procedure by which reliable and comparable results are obtained from measurements at source is known as a Protocol.

Protocols ensure that the sampling procedures are carried out correctly and that the results obtained accurately characterise the process.

The main components of a Protocol are as follows:-

1. Calibre and quality of the sampling team.
2. A reference measurement method (standard methods may not always be available)
3. A standard methodology setting out:

- health and safety considerations
- pollutants of interest
- plant operating conditions required
- selection and location of sampling position
- sampling characteristics (e.g. isokinetic etc) and techniques
- sampling frequency
- sampling duration
- number of samples
- type (including make and model), condition and suitability of sampling equipment
- required accuracy
- variability of emissions
- analytical methods including laboratory competence and NAMAS accreditation certificate copy for each pollutant of interest
- analytical precision
- procedures to be adopted if standard methods unavailable
- calibration certificate(s) for sampling equipment
- Quality Control and Quality Assurance procedures
- Presentation of results and associated information.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COVENTRY CANAL
STONEY STANTON ROAD
RED LANE
PEEL STREET
MILL
DYERS
QUARRY
PLAN 1
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WEBSTERS HEMMING & SONS LIMITED
KEY
Delineates Process boundry.
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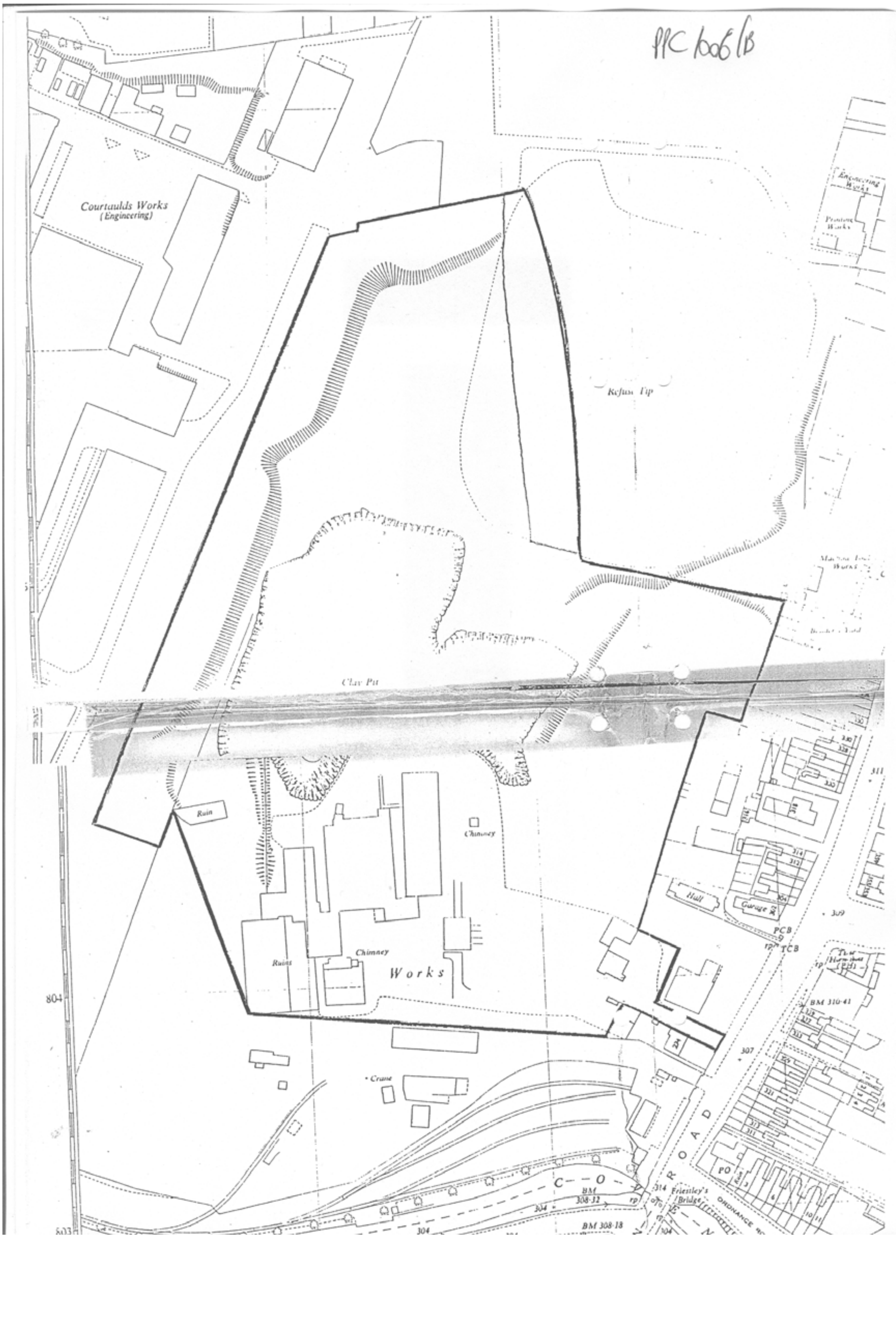
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Courtaulds Works
(Engineering)
Refuse Tip
Clay Pit
Ruin
Chimney
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Hall
Garage
Crane
PCB
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ROAD
Friestley's Bridge
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