



**Part B Application Form
Application for a Permit
Pollution Prevention and Control Act, 1999
Environmental Permitting (England and Wales) Regulations 2010**

INTRODUCTION

1. When to use this form

This regime is known as Local Authority Pollution Prevention and Control, **LAPPC**. Installations permitted under this regime are known as **Part B** installations. Use this form if you are sending an application for a 'Part B' permit to Coventry City Council under the Environmental Permitting Regulations 2010 ("the EP Regulations").

2. Before you start to fill in this form

You are strongly advised to read relevant parts of the Defra general guidance manual issued for LAPPC, republished in 2010 and available at:

<http://www.defra.gov.uk/environment/quality/pollution/ppc/localauth/pubs/guidance/manuals.htm>. This contains a list of other documents you may need to refer to when you are preparing your application, and explains some of the technical terms used. You will also need to read the relevant Process Guidance ("PG") Note for your process: <http://www.defra.gov.uk/environment/quality/pollution/ppc/localauth/pubs/guidance/notes/pgnotes/>. The EP Regulations can be obtained from the link: <http://www.legislation.gov.uk/ukxi/2010/675/contents/made>

3. Which parts of the form to fill in

You should fill in as much of this form as possible. The appropriate fee must be enclosed with the application to enable it to be processed further. When completed return to:

**Environmental Protection, Coventry City Council
Room 314 Broadgate House, Broadgate
Coventry CV1 1NH**

4. Other documents you may need to submit

There are a number of other documents you may need to send us with your application. Each time a request for a document is made in the application form you will need to record a document reference number for the document or documents that you are submitting in the space provided on the form for this purpose. Please also mark the document(s) clearly with this reference number and the application reference number (if you have been given one, it will be at the top of the form overleaf). If you do not have either of these, please use the name of the installation.

5. Using continuation sheets

In the case of the questions on the application form itself, please use a continuation sheet if you need extra space; but please indicate clearly on the form that you have done so by stating a document reference number for that continuation sheet. Please also mark the continuation sheet itself clearly with the information referred to above.

6. Copies

Please send the original and **three** copies of the form and all other supporting material, to assist consultation.

7. If you need help and advice

We have made the application form as straightforward as possible, but please get in touch with Environmental Protection on 0500 834333 or email env.protection@coventry.gov.uk if you need any advice on how to set out the information we need.

Application For An Environmental Permit Part B

* required information

Section 1 of 11			
Your reference	<input style="width: 90%;" type="text" value="CV3 2AN"/>		
Are you an agent acting on behalf of the applicant	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; height: 20px;"></td> <td style="width: 30%; text-align: center; vertical-align: middle;">NO √</td> </tr> </table>		NO √
	NO √		
Tick 'no' if you are applying on your own behalf or on behalf of a business you own or work for.			
Applicant details:			
*First name	<input style="width: 90%;" type="text" value="Louise"/>		
*Family name	<input style="width: 90%;" type="text" value="Bailey"/>		
*E-mail	<input style="width: 90%;" type="text" value="louise@toc-ltd.co.uk"/>		
Main telephone number (Include country codes)	<input style="width: 90%;" type="text" value="024 76450020"/>		
Other telephone number (Include country codes)	<input style="width: 90%;" type="text"/>		
Indicate here if you would prefer not be contacted by telephone	<input style="width: 50px; height: 15px;" type="checkbox"/>		
Are you:			
Applying as a business or organisation, including a sole trader	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; text-align: center; vertical-align: middle;">YES √</td> <td style="width: 70%;"></td> </tr> </table>	YES √	
YES √			
Applying as an individual	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;"></td> <td style="width: 30%; text-align: center; vertical-align: middle;">NO √</td> </tr> </table>		NO √
	NO √		
A sole trader is a business owned by one person without any special legal structure. Applying as an individual means you are applying so you can be employed, or for some other personal reason, such as following a hobby.			
Applicant Business			
*Is your business registered in the UK with Companies House?	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; text-align: center; vertical-align: middle;">YES √</td> <td style="width: 70%;"></td> </tr> </table>	YES √	
YES √			
*Is your business registered outside the UK?	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;"></td> <td style="width: 30%; text-align: center; vertical-align: middle;">NO √</td> </tr> </table>		NO √
	NO √		
*Business name	<input style="width: 90%;" type="text" value="T.O.C LTD"/>		
*VAT number	<input style="width: 90%;" type="text" value="272687034"/>		
If your business is registered, use it's registered name Put "none" if you are not registered for VAT			
*Legal status	<input style="width: 90%;" type="text" value="LIMITED COMPANY"/>		
*Your position in the business	<input style="width: 90%;" type="text" value="DIRECTOR"/>		
Home country	<input style="width: 90%;" type="text" value="UK"/>		
The country where the headquarters of your business is located			
Business Address			
*Building number or name	<input style="width: 90%;" type="text" value="T.O.C LTD"/>		
*Street	<input style="width: 90%;" type="text" value="BRANDON ROAD"/>		
If you have one, this should be your official address – that is an address required of you by law for receiving communications			

District	<input type="text"/>
*City or town	COVENTRY
County	WARWICKSHIRE
*Postcode	CV3 2AN
*Country	UK

Section 2 of 11

APPLICANT DETAILS

*Name of installation	ICI CLEANING PLANT
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Please give the address of the site of the installation

*Building number or name	T.O.C LTD
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*Street	BRANDON ROAD
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District	<input type="text"/>
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*City or town	COVENTRY
---------------	----------

County	<input type="text"/>
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*Postcode	CV3 2AN
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*Country	UK
----------	----

Telephone number	<input type="text"/>
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Ordnance Survey national grid reference 8 characters, for example SJ123456	SP3816077913
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Please give details of any existing LAPC or IPC authorisation for the installation, or any waste management licences or water discharge consents, excluding reference numbers(s) and type(s)

Section 3 of 11

THE OPERATOR

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

Full name of company, partnership or corporate body

T.O.C LTD

Trading/business name (if different from above)

Registered Address

Is this address the same as the address given in section 1?

YES

√

If "no" enter address below:

Building number or name

Street

District

City or town

County

Postcode

Country

Principal Office Address

Is the principal address the same as the registered address?

YES

√

If "no" enter address below:

Building number or name

Street

District

City or town

County

Postcode

Holding Companies

Is the operator a subsidiary of a holding company within the meaning of section 1159 of the Companies Act 2006?

YES

NO

√

ABOUT THE INSTALLATION

Please state below details of all the current activities in operation at the whole installation.
Please identify all activities listed in Schedule 1 to the EP regulations that are, or are proposed, to be carried out in the stationary technical unit of the installation.

Degreasing work pre paint finishing
Cleaning parts for welding process
Cleaning

Please identify any directly associated activities that are, or are proposed, to be carried out on the same site which:

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

Spray coating metal parts
Chapter 6 Section 7 Part B

Please quote the chapter number, section number, then paragraph and sub-paragraph number as shown in Part 2 of schedule 1 to the EP regulations (for example, manufacturing glass and glass fibre where the use of lead or any lead compound is involved, would be listed as chapter 3, section 3.3, part B(b))

Activities in the stationary technical unit

Surface cleaning
Chapter 6 Section 7 Part B

Directly associated activities

Schedule 1 reference

Why is the application being made?

- The installation is new
- The installation is existing, but changes to the installation or to the EP regulations means that an LAPPC part B permit is now required

Site Maps

Please provide a suitable map showing the location of the installation, clearly defining the chimney location and oil storage tank

Document reference

Please provide a suitable plan showing the layout of activities on the site, including bulk storage of materials, waste storage areas and external emission points to atmosphere

Document reference

Section 5 of 11

THE INSTALLATION

Please provide information about the aspects of your installation. We need this information to determine whether you will operate the installation in a way in which the environmental requirements of the EP Regulations are met.

Describe the proposed installation and activities and identify the foreseeable emissions to air from each stage of the process (this will include any foreseeable emissions during start up, shut down and any breakdown/abnormal operation)

The use of flow diagrams may aid to simplify the operations.

1. ICI Degreasing plant using Methylene Chloride 50040
2. Roller shutter top closed at all times except when loading/unloading
3. Green light system informs user plant is ready to load/reload
4. Operator trained to empty degreaser using crane allowing any excess fluid to drain back into unit
5. A "Closed" Cold water System, inside the unit cools vapours and causes the degreasing fluid to fall back in to the base of the plant. This closed cold water system is chilled by a "chiller" unit to the side of the plant.
6. An extraction unit and LEV system removes any excess vapours from the top of the plant and runs continually when plant is switched on.
7. Majority of emissions are waste gases. See report.

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

Atmospheric emissions should be categorised under the following

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

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

(Emission concentration = e.g. milligrams per cubic metre of air; mass emissions = e.g. grams per hour, tonnes per year)

Annual testing carried out on all extraction units.

Previous assessment carried out January 2012, please see attachment ref: Ex 012 7036 R W Vesey Ltd
Annual assessment carried out January 2013 including Stack sampling degreaser plant. Please see reports.

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

There is no abatement in LEV extraction to atmosphere at present.

Operator trained to run degreaser using the roller shutter door at all times to limit emissions. Roller shutter door opened and closed on average 30 – 50 times a day.

Degreaser cleaned out when plant is cold to limit emissions.

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

Please refer to the Hazard Identification and Risk Assessment 1, 2, 14, 47, 56

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

We monitor all LEV throughout the factory as required by regulations, previous findings and our external contractor R W Vessey Ltd
Our next inspection of LEV is due January 2013 when we will include stack sampling with our Exhaust Ventilation examinations.

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

Regular examinations and monitoring by externally qualified personnel, daily checks on the plant, one trained and dedicated plant operator provided with correct training and PPE, annual checks on functioning of overhead jib and hoist. Inspection of the plant tank/chamber when emptied (performed as and when required, typically between 1-2 times annually)

Signage posted to top surface of plant on personal safety requirements and correct operation of plant.

Section 6 of 11

IMPACT ON THE ENVIRONMENT

Provide an assessment of the potential significant local environmental effects of the foreseeable emissions (e.g. is there a history of complaints and/or is the installation in an air quality management area?)

We are aware of:
Herald Way Marsh SP380769 Biological and Geological SSI
However this is not in relation to TOC Ltd, but a known complaint in the area.

Are there any Sites of Special Scientific Interest (SSIs) or European protected sites which are within either;

- 2 kilometres – for an installation which includes part B combustion, incineration (but not crematoria), iron and steel and non-ferrous metal activities
- 1 kilometre – for part B mineral activities and cement and lime activities
- ½ a kilometre – for all other part B activities

	NO
	UNKNOWN

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ENVIRONMENTAL STATEMENTS

Has an environmental impact assessment been carried out under The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999/293, for any other reason with respect to the installation?

	NO
	UNKNOWN

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ADDITIONAL INFORMATION

Please supply any additional information which you would like us to take account of in considering this application.

It is clear from our recent stack sample testing carried out in January we need to dramatically reduce emissions from our degreasing plant.

The sample testing showed us that there is a large loss in emissions when the plant is operating both when the roller door is closed and more so when open.

We have been looking into our, as we see it, two options.

Option 1 - Reduce the need for a permit.

To source a new cleaning product that would work in conjunction with our degreasing plant at the same time giving us the cleaning finish we require.

Samples to be tested to suit our finished quality standards.

We have looked into Mykal cleaning methods and will be sampling shortly.

Orapi Applied Limited is visiting us after Easter with recommendations for alternative cleaning.

Layton Technologies has also been contacted and will be visiting our site shortly once a product matrix relating to sizes and weights has been identified with a view to supplying us with a new/used degreasing plant.

They have suggested any modifications to our ICI plant may not enable us to comply

Graham Butcher of Stowlin Croftshaw suggested several initial modifications that should have an immediate effect on emission levels although emissions would have to be heavily monitored for results as well as a change in cleaning product.

Option 2 - Modify our Plant

1. Run chiller unit 24/7 -
2. Increase the chiller coils inside plant to wrap around all 4 internal sides of bath.
3. Lower the running temperature of chiller unit - implemented
4. Improve seal to roller door and reduce the opening to storage void for roller door.
5. Monitor usage of cleaning product before and after modifications..
6. Monitor emissions to stack – if necessary install abatement to stack.

Along with our annual testing of our ICI plant we will include stack sampling to check emissions at the same time and record findings.

Fugitive emissions.

Lidded bins (O 6 Collected waste) introduced and stored along side degreaser and wet spray booth – Implemented.

Storage containers for (O 8 Solvents recycle) labelled and stored to the rear of the property - Implemented

Yellow trug bucket containing absorbent grit sited in front of degreasing plant – current

Maintenance.

When replenishing methylene Chloride in plant operator presently fills degreaser using hand held container. Within the next month we hope to implement a tap system that will illuminate the need for this and reduce emissions during this process.

Our preferred option is to change our degreasing plant as we are very keen to negate the need for a permit. We are committed to this change within the next 6 months.

Layton Technologies are working closely with us to achieve our Emissions limit.

Section 9 of 11**ANNUAL CHARGES**

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

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

Contact name	Mrs A Taylor
Building number or name	T.O.C LTD
Street	BRANDON ROAD
District	
City or Town	COVENTRY
County	WARWICKSHIRE
Postcode	CV3 2AN
Telephone number	024 76450020
Other telephone number	
Please give company purchase order number or any other reference number	

Section 10 of 11**COMMERCIAL CONFIDENTIALITY**

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

	NO √
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Please provide full justification, considering the definition of commercial confidentiality within the PPC Regulations

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

	NO √
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Please provide full justification, considering the definition of commercial confidentiality within the PPC Regulations

The information you give will be used by the local authority to process your application. It will be places on the relevant public register and used to monitor compliance with the permit conditions. We may also use and

or disclose any of the information you give us in order to;

- Consult with the public, public bodies and other organisations
- Carry out statistical analysis, research and development on environmental issues.
- Provide public register information to enquirers
- Make sure you keep to the conditions of your permit and deal with any matters relating to your permit
- Prevent breaches of environmental law
- Offer you documents or services relating to environmental matters
- Respond to requests for information under the Freedom of Information Act 2000 and the Environmental Regulations 2004 (if the data Protection Act allows)
- Assess customer service satisfaction and improve our service

We may pass on the information to agents/representatives who we ask to do any of these things on our behalf. It is an offence under regulation 38 of the EP regulations, for the purpose of obtaining a permit (for yourself or anyone else) to:

- Make a false statement which you know to be false or misleading in a material particular
- Recklessly make a statement which is false or misleading in a material particular

Section 11 of 11

PAYMENT DETAILS

This fee must be paid to the authority.

* Fee Amount

Postal Address

Building number or name

Street

District

City or Town

County

DECLARATION

This section should be completed by the applicant, unless you answered "Yes" to the question "Are you an agent acting on behalf of the applicant?"

I/We certify:

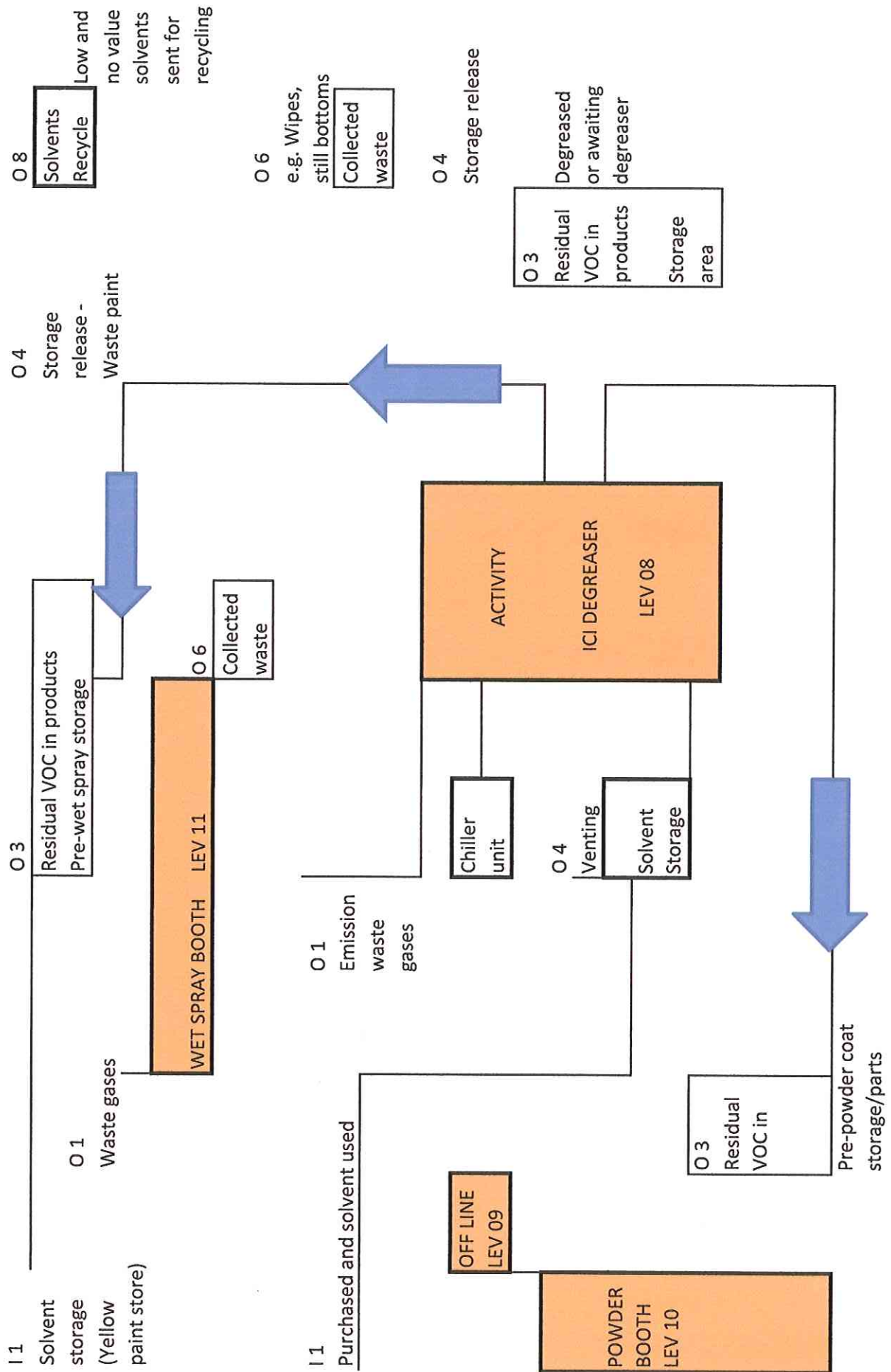
No offences have been committed in the previous five years which are relevant to my/our competence to operate this installation in accordance with the EP Regulations (delete as appropriate*)

* Full name

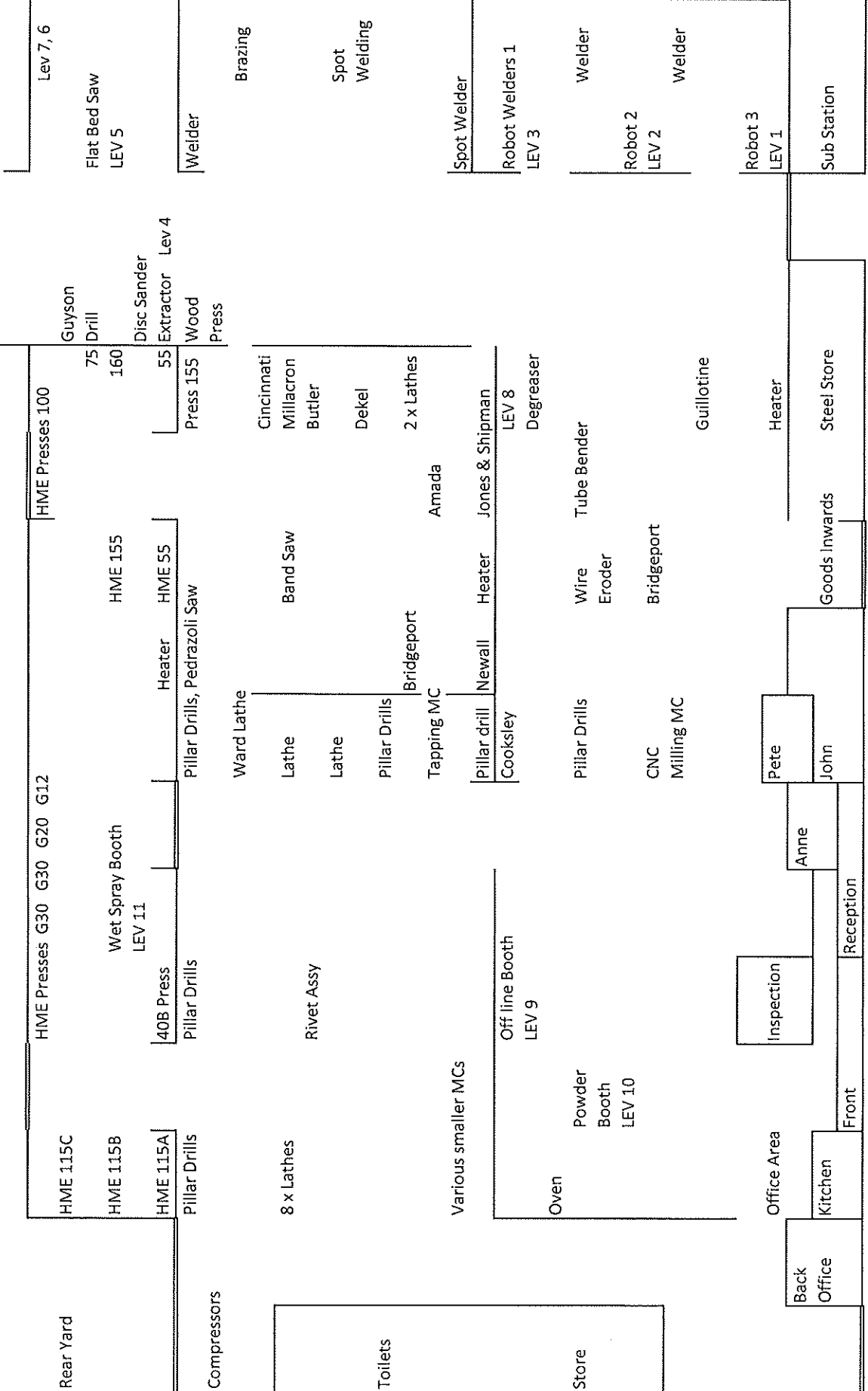
* Capacity

Date (dd/mm/yyyy)

SOLVENT MANAGEMENT PLAN T.O.C LIMITED



Machine Plant Site plan including LEV extraction SPEX 04



Front Yard



STACK EMISSIONS MEASUREMENTS

Tools of Coventry Ltd

January 2013

Carried out on

14th January 2013

Report Number: 2289/1218

Report Written By:



S Cletheroe

Senior Site Engineer

Date: 06/02/2013

Report Checked By:



S Lockwood

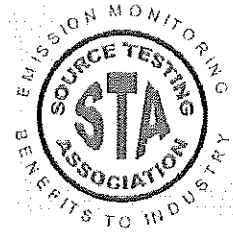
Senior Consultant

Date: 06/02/2013



ENVIRONMENT
AGENCY

sira
Sira Certification Service



The personnel carrying out the monitoring work for this exercise are qualified under the MCERTS scheme as follows:

1. Stephen Lockwood

Senior Consultant
MCERTS Registration No MM 03 407

Level 2 (team leader)

Technical Endorsements held:
TE1 (Particulate monitoring by isokinetic sampling techniques)
TE4 (Gases / Vapours by instrumental techniques)

Certificate Number: Sira MP 04 217
Date of certification: 12 October 2004
Date of re-certification: 28 September 2009
Renewal date: 12 October 2014

2. Stephen Cletheroe

Senior Site Engineer
MCERTS Registration No MM 03 408

Level 2 (team leader)

Technical Endorsements held:
TE1 (Particulate monitoring by isokinetic sampling techniques)

Certificate Number: Sira MP 04 226
Date of certification: March 2012
Renewal date: March 2017

The MCERTS scheme is operated by SIRA Certification Service on behalf of the Environment Agency.

The scheme involves written examinations and interviews and was introduced to ensure that stack monitoring work is carried out to the required standards by suitably qualified personnel.

CONTENTS OF REPORT

- 1 Introduction
- 2 Summary of results
- 3 Emission limits and comments on results

Sampling data

- 4 Dichloromethane sampling data summary sheets

Test methods

- 5 Dichloromethane

1.0 Introduction

1.1 This exercise consisted of the following test carried out on the systems listed below

1. De-Grease Tank

Tank Lid "open", (lid is open during loading and unloading and closed during the de-greasing cycle).

Tank in normal use

Tank up to normal working temperature

Extraction system running

2. De-Grease Tank

Tank Lid "closed" (continuously)

Tank not in use

Tank up to normal working temperature

Extraction system running

(a) Measurement of Dichloromethane using BS EN 13649 method.

1.2 The tests were carried out as instructed by the Local Authority to measure the dichloromethane emissions during different operating conditions of the de-grease tank.

2.0 Summary of results

2.1 The monitoring exercise returned the following results:

System	Emission Limit	Result	Units
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De-Grease Tank			
Sample 1 - Tank Lid "Open"	No limit set	350.1	mg/m ³ C
Sample 2 - Tank Lid "Closed"		108.7	mg/m ³ C

2.2 All the results are expressed at the following reference conditions:-

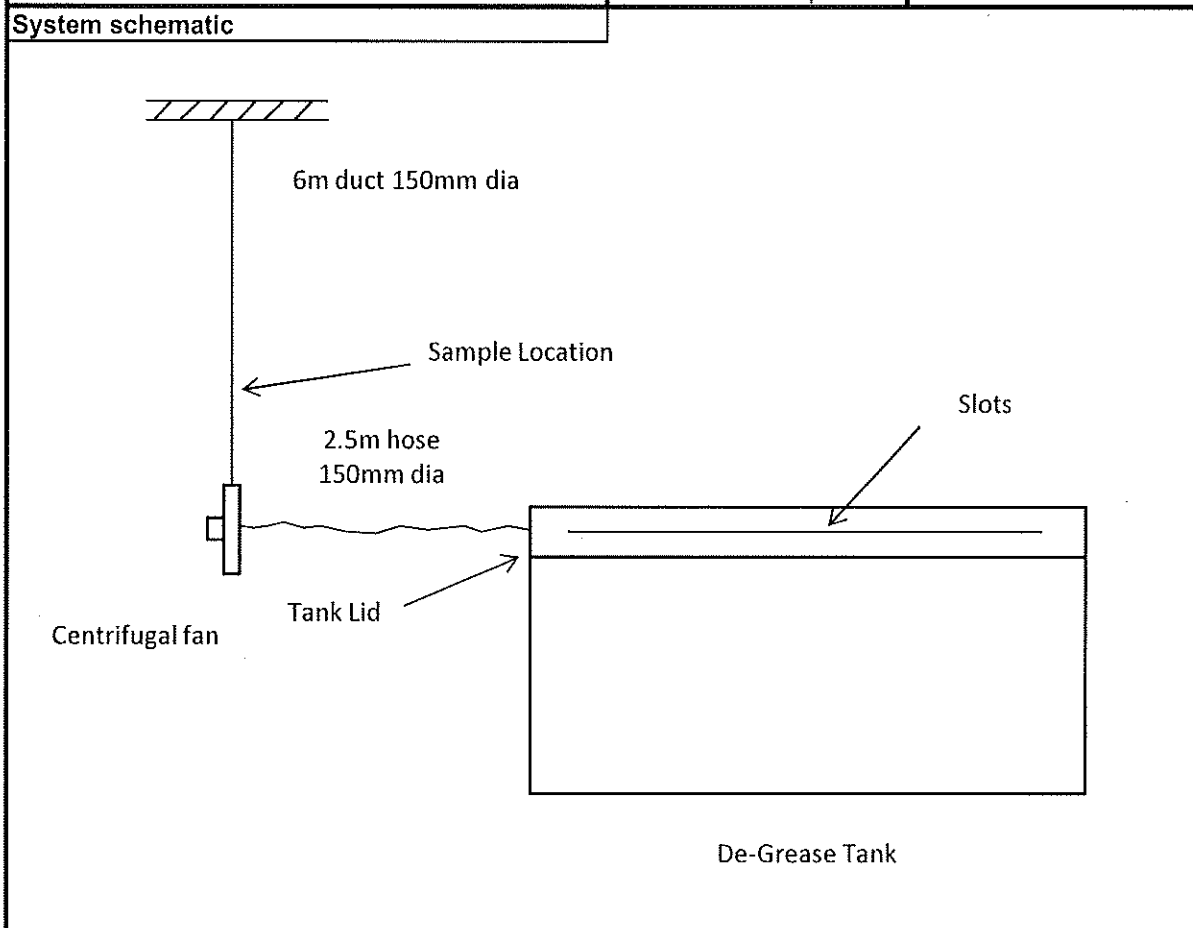
Temperature 273 °K
Atmospheric pressure 101.3 Kpa

3.0 Emission limits and comments on results

- 3.1 There is no dichloromethane emission limit currently set for the de-greasing process and therefore no comment can be given regarding the results of the monitoring exercise.

4.0 (a) Dichloromethane Sampling Data Summary Sheet

Client Details	Plant Details	Date & Time
Tools of Coventry	De-Grease Tank Tank Lid - Open	14th January 2013 10:20

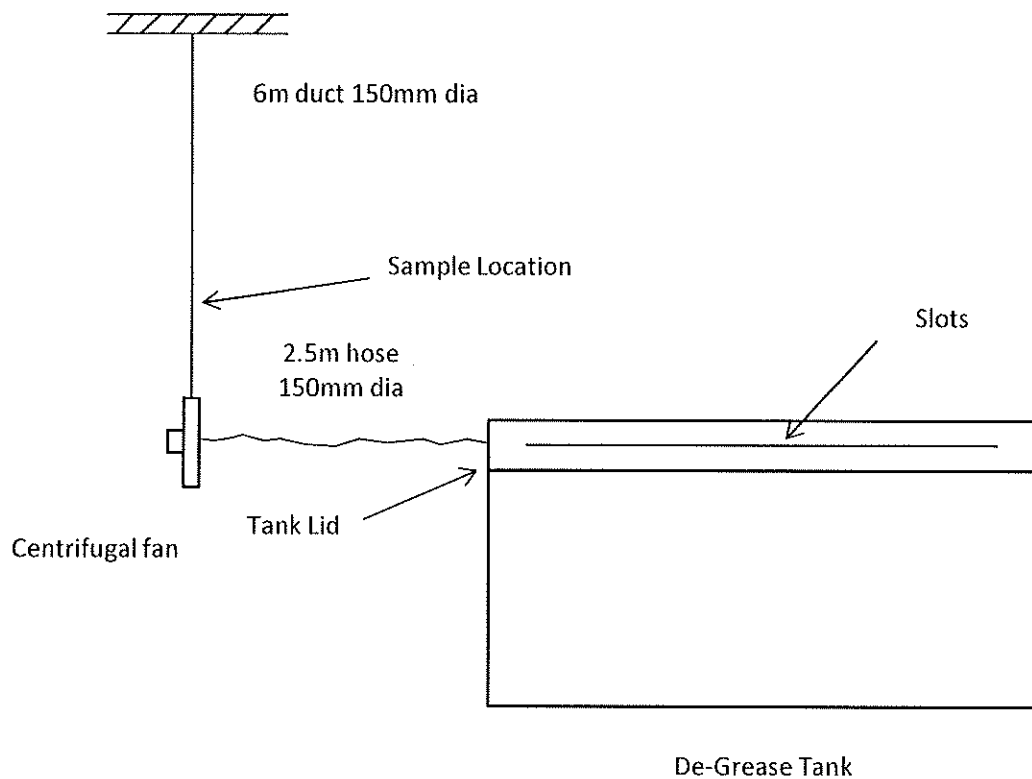


Stack Temp	Stack velocity	Duct diameter	Efflux rate
20 °C	13.5 m/sec	150 mm	859.2 m ³ /hr
Pump I/D	Sample rate	Sample duration	Volume sampled
SK1	100.0 ml/min	88 mins	8.8 litres
Tube reference	Lab reference	Analyte	Absorbed weight
TOC 140101	729918	Dichloromethane	20300 µg
Emission concentration		Result corrected to STP	
2306.8 mg/m ³		2475.8 mg/m ³	
Expressed as carbon		Mass rate of emissions	
350.1 mg/m ³		2.0 Kg per hour	

4.0 (b) Dichloromethane Sampling Data Summary Sheet

Client Details	Plant Details	Date & Time
Tools of Coventry	De-Grease Tank Tank Lid - Closed	14th January 2013 11:50

System schematic



Stack Temp	Stack velocity	Duct diameter	Efflux rate
23 °C	13.5 m/sec	150 mm	859.2 m ³ /hr
Pump I/D	Sample rate	Sample duration	Volume sampled
SK1	100.0 ml/min	109 mins	10.9 litres
Tube reference	Lab reference	Analyte	Absorbed weight
TOC 140102	729919	Dichloromethane	7730 µg
Emission concentration		Result corrected to STP	
709.2 mg/m ³		768.9 mg/m ³	
Expressed as carbon		Mass rate of emissions	
108.7 mg/m ³		0.6 Kg per hour	

5.0 Monitoring method - Dichloromethane

- 5.1 The method used for the tests was as described in BS EN 13649.
- 5.2 A low volume flow air sample pump is used to draw a known volume of air through a tube containing activated charcoal beads, which absorb any organic vapours present. The tube is analysed in an approved laboratory, by gas chromatography techniques. The laboratory report the amount of each specified solvent absorbed, from which the concentration in the air sample can be calculated. Results can be expressed either as mg/m³ or as parts per million (ppm).