



PPC Permit ref: 067
Variation ref: 003

Coventry City Council
Environmental Permitting (England and Wales) Regulations 2010
Regulation 20 and Regulation 18 *in relation to consolidated permits*

Notice of Variation

To: Covrad GT
Sir Henry Parkes Road
Canley
Coventry
CV6 5BN

Coventry City Council ("the Council"), in the exercise of the powers conferred upon it by regulation 20 of the Environmental Permitting Regulations 2010 ("the 2010 Regulations") hereby gives you a notice as follows-

The Council has decided to vary the conditions of permit reference PPC/067 granted under regulation 13(1) of the 2010 Regulations in respect of the operation of the installation at:

Covrad GT
Sir Henry Parkes Road
Canley
Coventry
CV6 5BN

The variation of the conditions of the permit are specified in Schedule 1 to this notice.

Signed on behalf of Coventry City Council

..... Date.....

An authorised officer of the Council

PPC Permit ref: PPC/067
Variation ref: 003

SCHEDULE 1

All conditions contained within Permit reference number PPC/067 issued on 24th March 2005 shall be deleted. All amendments to Permit reference number PPC/067 listed in all previous variation notices shall be deleted. Permit Reference number PPC/067 shall be varied with IMMEDIATE effect to read as follows:

Guidance for operators receiving a Variation Notice

(This guidance does not form part of the Variation Notice, but it is for the guidance of those served with the notice.) Further guidance can be found in the PPC [General Guidance Manual](#).

Dealing with a Variation Notice

This notice varies the terms of the permit specified in the Notice by amending or deleting certain existing conditions and/or adding new conditions. The Schedules attached to the notice explain which conditions have been amended, added or deleted and the dates on which these have effect.

The Council may have included a 'consolidated permit', which takes into account these and previous variations. Where a consolidated permit is not included this variation notice must be read in conjunction with your permit document.

Offences

Failure to comply with a Variation Notice is an offence under regulation 38(2) of the 2010 Regulations. A person guilty of an offence under this regulation could be liable to (i) a fine of up to £50,000 or imprisonment for a term not exceeding 6 months or both; or (ii) to an unlimited fine or imprisonment for a term not exceeding 5 years or both, depending on whether the matter is dealt with in the Magistrates or Crown Court.

Appeals

Under regulation 31 and Schedule 6 of the 2010 Regulations operators have the right of appeal against the conditions attached to their permit by a variation notice. The right to appeal does not apply in circumstances where the notice implements a direction of the Secretary of State/Welsh Ministers given under regulations 61 or 62 or a direction when determining an appeal.

Appeals against a Variation Notice do not have the effect of suspending the operation of the Notice. Appeals do not have the effect of suspending permit conditions, or any of the mentioned notices.

Notice of appeal against a Variation Notice must be given within **two months** of the date of the variation notification, which is the subject matter of the appeal. The Secretary of State/Welsh Ministers may in a particular case allow notice of appeal to be given after the expiry of this period, but would only do so in the most compelling circumstances.

How to appeal

There are no forms or charges for appealing. However, for an appeal to be valid, appellants (the person/operator making the appeal) are legally required to provide the Secretary of State or Welsh Minister with the following (see paragraphs 2(1) and (2) of Schedule 6 of the 2010 Regulations):

- **written notice of the appeal**
- **a statement of the grounds of appeal;**
- **a copy of any relevant application;**
- **a copy of any relevant environmental permit;**
- **a copy of any relevant correspondence between the appellant and the regulator;**

- **a copy of any decision or notice which is the subject matter of the appeal; and**
- **a statement indicating whether the appellant wishes the appeal to be in the form of a hearing or dealt with by way of written representations.**

Appellants should state whether any of the information enclosed with the appeal has been the subject of a successful application for confidentiality under regulation 48 of the 2010 Regulations, and provide relevant details – see below. Unless such information is provided all documents submitted will be open to inspection.

Where to send your appeal documents

Appeals should be despatched on the day they are dated, and addressed to:

The Planning Inspectorate
Environment Team, Major and Specialist Casework
Room 4/04 Kite Wing
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN

If an appeal is made, the main parties will be kept informed about the next steps, and will also normally be provided with additional copies of each other's representations.

To withdraw an appeal – which may be done at any time - the appellant must notify the Planning Inspectorate in writing and copy the notification to the local authority who must in turn notify anyone with an interest in the appeal.

Costs

The operator and local authority will normally be expected to pay their own expenses during an appeal. Where a hearing or inquiry is held as part of the appeal process, by virtue of paragraph 5(6) of Schedule 6, either the appellant or the authority can apply for costs.

Applications for costs are normally heard towards the end of the proceedings and will only be allowed if the party claiming them can show that the other side behaved unreasonably and put them to unnecessary expense. There is no provision for costs to be awarded where appeals are dealt with by written representatives.

Confidentiality

An operator may request certain information to remain confidential, i.e. not be placed on the public register. The operator must request the exclusion from the public register of confidential information at the time of supply of the information requested by this notice or any other notice. The operator should provide clear justification for each item wishing to be kept from the register. The onus is on the operator to provide a clear justification for each item to be kept from the register. It will not simply be sufficient to say that the process is a trade secret.

The test of whether information is confidential for the purposes of being withheld from the public register is complex and is explained, together with the procedures, in chapter 8 of the PPC General Guidance Manual.

National security

Information may be excluded from the public register on the grounds of National Security. If it is considered that the inclusion of information on a public register is contrary to the interests of national security, the operator may apply to the Secretary of State/Welsh Ministers, specifying the information and indicating the apparent nature of risk to national security. The operator must inform the local authority of such an application, who will not include the information on the public register until the Secretary of State/Welsh Ministers has decided the matter.

Schedule 1 of PPC/067 Variation 003



**Pollution Prevention & Control Act 1999
Environmental Permitting (England and Wales)
Regulations 2010**

Document A: Environmental Permit

**Covrad GT (An API Heat Transfer Company)
Reference Number PPC/067**

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

Covrad GT

Whose registered office is:

**Sir Henry Parkes Rd
Canley
Coventry
CV6 5BN**

INFORMATION ONLY

To operate a Part B installation involving a surface cleaning activity as prescribed in Section 7 Part B of Schedule 1 Part 2 to The Regulations, and a metal coating activity, as prescribed in Section 6.4 Part B of Schedule 1 Part 2 to The Regulations, at:

**Covrad GT
Sir Henry Parkes Rd
Canley
Coventry
CV6 5BN**

The permit is subject to the conditions specified in this document consisting of 17 pages and comprising documents A, B, C and Plan PPC/067/A. Appendix 1 contains supplementary notes.

Signed.....

Sara Roach - Assistant Director 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 Part 2 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 PG 6/23 (11) – Coating of Metal and Plastic
- Secretary of States Guidance Note PG 6/45 (11) – Surface Cleaning
- 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: Neil Chaplin

LEGISLATION

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

INFORMATION ONLY

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 general location of the Permitted Process is shown on the attached plan PPC/067/A. The internal layout of the factory is shown on the attached plan PPC/ 067/B, including the paint store, locations of spray booths, aluminium degreaser and powder coating line.

INFORMATION ONLY

1. Vapour degreasing of metal components using perchloroethylene, an organic solvent carrying the risk phrase R40, in a totally enclosed degreasing unit prior to assembly. A device continually measures the level of solvent vapour in the degreasing chamber, which is interlocked, thereby preventing the access door being opened, unless the solvent level is <math> < 1\text{g/m}^3 </math>. This is achieved by the use of vacuum pumps and activated charcoal filters. The solvent is held in sealed tanks until required. There are no exhaust stacks within the plant as it is a totally enclosed system. The installation contains one EVT model Gigant degreasing enclosure, serial number 07376. There are no emissions to atmosphere.

This is a Solvent Emissions Directive surface cleaning activity as defined in Schedule 1 Part 2, Section 7 Part B, of the Environmental Permitting (England and Wales) Regulations 2010 using over 1 tonne of organic solvent carrying the R40 risk phrase, in a 12 month period or 2 tonnes or more of any other solvent.

2. The application of paints to components, subassemblies and main assemblies inside two spray booths. There are two spray booths, known as the Industrial Spray booth and the assembly shop spray booth where the application of intermediate and finish paint systems to components, sub assemblies and main assemblies takes place. All emissions from the two spray booths are released to atmosphere.

This is a coating activity as defined in Schedule 1 Part 2, Chapter 6 Section 6.4 Part B of the Environmental Permitting (England and Wales) Regulations 2010 using 5 tonnes or more of organic solvents.

Table 1**List of Process Areas within the Installation and Associated Emission Points, Pollutants of Concern and Abatement Plant Required**

Area/Machinery Identification	Pollutants Emitted	Emission Limit in Permit	Abatement Plant Required	Monitoring Frequency
Aluminium degreasing unit (using perchloroethylene)	VOC	Fugitive Emission Limit 15% of solvent input	None	Demonstrate compliance annually
Paint Spraying in Industrial Spray Booth	VOC	VOC - Solvent Reduction Scheme	None	Submit Solvent Management Plan annually
	Particulate Matter	Particulates - 50mg/Nm ³	Dry filtration	Manual extractive test every 2 years
Paint Spraying in Assembly Shop Spray Booth	VOC	VOC - Solvent Reduction Scheme	None	Submit Solvent Management Plan annually
	Particulate Matter	Particulates - 50mg/Nm ³	Dry filtration	Manual extractive test every 2 years

Note: See relevant sections of Permit for monitoring requirements

DOCUMENT B**CONDITIONS**

All conditions shall have immediate effect unless stated otherwise.

1.0 EMISSION LIMITS AND CONTROLS

- 1.1 Emissions from combustion processes should 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
- 1.2 All releases to air, other than condensed water vapour, shall be free from persistent visible emissions
- 1.3 All emissions to air shall be free from droplets
- 1.4 There shall be no offensive odour beyond the site boundary, as perceived by the regulator.
- 1.5 The following emission concentration limit shall apply to releases to atmosphere from contained sources:
 - Total Particulate Matter - 50mg/m³

2.0 MONITORING, SAMPLING AND MEASUREMENT OF EMISSIONS

- 2.1 To demonstrate compliance with Conditions 1.1, 1.2, 1.3 and 1.4 visual and olfactory assessments of emissions shall be made frequently and at least once each day when the process is in operation. The time, location, result and weather conditions of these assessments shall be recorded
- 2.2 Emissions of particulate matter from the Industrial spray booth and the Assembly shop spray booth shall be monitored annually to the main procedural provisions of BS ISO 13284 with averages taken over operating periods excluding start up and shut down.
- 2.3 The reference conditions for the limit given in condition 1.5 are 273.15K, 101.3kPa, without correction for water vapour content, unless stated otherwise.
- 2.4 For extractive testing the sampling should meet the following requirements:
 - For batch processes the extractive sampling should take place over a complete cycle of the activity and;
 - For all activities the sampling period should be sufficient such that at least 3 results are obtained
- 2.5 Should the activity be continuous, or have a batch cycle that is not compatible with the time available for sampling then the data required should be obtained over a minimum period of 2 hours in total where:

- No 30 minute mean emission concentration should exceed twice the specified emission concentration limits during normal operation (excluding start up and shut down)
 - For extractive testing, no result of monitoring should exceed the emission limit concentrations specified
- 2.6 The operator shall notify the regulator at least 7 days before any periodic monitoring exercise to determine compliance with emission limit values. The operator shall state the provisional time and date of monitoring, pollutants to be tested and the methods to be used.
- 2.7 The results of any non-continuous emission testing shall be forwarded to the regulator within 8 weeks of the completion of the sampling.
- 2.8 The operator shall ensure that adequate facilities for sampling are provided on vents or ducts.
- 2.9 The introduction of dilution air to achieve the emission concentration limit in Condition 1.5 shall not be permitted.
- 2.10 Adverse results from **any** monitoring activity shall be investigated by the operator as soon as the monitoring data has been received. The operator shall:
- 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
- 2.11 The operator shall keep records of inspections, tests and monitoring, including all non-continuous monitoring, inspections and visual assessments. In such cases:
- Records shall be kept on site by the operator for at least two years
 - Made available for the regulator to examine
- 2.12 The operator shall provide a list of key abatement plant and shall have a written plan for dealing with its failure, in order to minimise any adverse affects.
- 2.13 In the case of abnormal emissions, malfunction or breakdown leading 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.
- 2.14 The regulator shall be informed without delay if there is an emission that is likely to have an effect on the local community or in the event of the failure of key arrestment plant

3.0 DISPERSION OF CONTAINED EMISSIONS

- 3.1 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.
- 3.2 Stacks and ductwork shall be cleaned to prevent accumulation of materials, as part of the routine maintenance programme.
- 3.3 Stacks or vents shall not be fitted with any restriction at the final opening such as a plate, cap or cowl or other restriction at the final opening. The discharge from the chimney shall be vertically upwards.

4.0 MATERIALS HANDLING AND PROCESSING

- 4.1 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.
- 4.2 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.
- 4.3 All potentially odorous waste materials shall be store in suitable closed containers or bulk storage vessels, where appropriate vented to suitable abatement plant.
- 4.4 All measures shall be taken to minimise VOC emissions during mixing i.e. the use of covered or closed mixing vessels
- 4.5 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.
- 4.6 All reasonably practicable effort shall 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.
- 4.7 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.
- 4.8 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.

- 4.9 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.

Note: From a Health & safety point of view it is advised that bins should be emptied at least daily, as they not only present a fire hazard, they may also undergo spontaneous combustion – for such materials special bins that allow air to circulate beneath and around them to aid cooling are advised.

5.0 CLEANING OPERATIONS

- 5.1 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.
- 5.2 Where practicable, fixed equipment shall be cleaned in situ, and such equipment shall, where practicable, be kept enclosed whilst cleaning is carried out.
- 5.3 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.
- 5.4 Residual coating materials contained in parts of the application equipment shall be removed prior to cleaning.
- 5.5 Suitable organic solvent containment and spillage equipment shall be readily available in organic solvent handling areas.
- 5.6 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.
- 5.7 Dusty wastes shall be stored in closed containers and handled in a manner that avoids emissions
- 5.8 All spillages shall be cleared as soon as possible; solids by vacuum cleaning, wet methods, or other appropriate techniques. Dry sweeping of dusty materials shall not be permitted.

6.0 SOLVENT MANAGEMENT

- 6.1 A programme to monitor and record the consumption of coatings against product produced shall be used to minimise the amount of excess organic solvent/coating used.
- 6.2 A determination of the organic solvent consumption, the total mass of organic solvent inputs minus any solvents sent for reuse/recovery off site, shall be made and submitted to the regulator annually. The determination of solvent consumption shall be in the form of a mass balance calculation to determine the annual actual consumption of organic solvent. The quantity of compliant and non compliant coating shall also be determined.

- 6.3 The operator shall implement a system of solvent mass tracking and shall use this data to provide a Solvent Management Plan (SMP) to demonstrate compliance with the provisions of the Solvent Emissions Regulations 2004. Compliance with the Reduction Scheme is achieved if the annual actual solvent emission determined from the Solvent Management Plan is less than or equal to the Target Emission, in accordance with Process Guidance Note 6/23(11):

Coating activity	5-15 tonnes solvent consumption	Total mass of solids x 0.6
	Over 15 tonnes	Total mass of solids x 0.37

Fugitive Emission Limit: 25 % of organic solvent input

- 6.4 The Solvent Management Plan and associated solvent mass tracking data shall be made available for inspection by the regulator upon request.
- 6.5 The operator shall undertake an annual review to ascertain whether any solvent/coating used contains one of the following designated risk phrase materials: R45, R46, R49, R60, R61 (Hazard phrase H340, H350, H350i, H360D, H360F) and shall seek to replace that solvent/ coating with a less harmful substance or preparation.

7.0 METAL DEGREASING AND CLEANSING

- 7.1 The following emission limit shall apply to fugitive emissions to atmosphere:
- Fugitive emissions value – 15% of solvent input
- 7.2 All appropriate precautions must be taken to minimise emissions during start-up and shutdown.
- 7.3 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).
- 7.4 When charging the degreasing/cleansing plant and when pumping out waste, a totally contained emission free transfer system shall be used. Charging of the bath can be by pump or gravity fed methods. The point at which organic solvent discharges into the degreasing/cleansing plant shall, where practicable, be below the liquid level in the sump. If the discharge point is above the liquid level, the plant must be cool before introducing organic solvent. Condensing and ventilation systems must be in operation when transferring organic solvent.
- 7.5 The programming and loading of parts into the vapour degreasing/cleansing machines shall be controlled, monitored and reviewed to ensure that the number of surface cleaning operations is minimised. The basket shall be loaded to its maximum capacity and the orientation and packing of the components shall be optimized to reduce possible retention and drag out of organic solvent.

- 7.6 The degreasers/cleansing tanks shall be inspected monthly for leaks.
- 7.7 Where manual cleaning with solvents is unavoidable:
- Cleaning solvents shall be dispensed by a piston type or similar contained dispenser when used on wipes
 - Pre impregnated wipes should be held within an enclosed container prior to use
 - Used wiping cloths or brushes shall be stored in enclosed containers pending recovery or disposal.
- 7.8 A vapour level cut out shall be fitted and set in accordance with the manufacturers instructions
- 7.9 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

8.0 GENERAL OPERATIONS

- 8.1 A high standard of housekeeping shall be maintained.
- 8.2 Spares and consumables, particularly those subject to continual wear shall be held on site, or shall be available at short notice from guaranteed suppliers, so that plant breakdowns can be rectified rapidly.
- 8.3 The operator shall maintain a written maintenance programme for all pollution control equipment and a record of maintenance that has been undertaken and shall be made available for inspection by the regulator.
- 8.4 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).
- 8.5 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.
- 8.6 The process operator shall ensure that adequate environmental management systems (EMS) 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 tailored to the nature and size of the business.

- 8.7 All staff whose functions could impact on air emissions from the activity should receive appropriate training on those functions. This should include:
- Awareness of their responsibilities under the permit,
 - Steps that are necessary to minimise emissions on start up and shut down
 - Action to take when there are abnormal conditions or accidents or spillages that could, if not controlled, result in emissions
- 8.8 The operator shall maintain a statement of training requirements for each post with the above mentioned functions and keep a record of the training received by each person. These documents shall be made available to the regulator on request.
- 8.9 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.

INFORMATION ONLY

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 –

- “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;
- “best” means, in relation to techniques, the most effective in achieving a high general level of protection of the environment as a whole;
- “techniques” includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

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.

PPC/067 Plan A – Site Boundary and Location



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



APPENDIX 1 - 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 the 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

INFORMATION ONLY