

**CHARNWOOD BOROUGH COUNCIL****POLLUTION PREVENTION AND CONTROL ACT 1999****ENVIRONMENTAL PERMITTING (ENGLAND AND WALES)  
REGULATIONS 2016****PERMIT REF. NO. 074**

Charnwood Borough Council hereby permits, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016

**Bradgate Containers Ltd**

whose registered office is:

**Leicester Road Shepshed, Loughborough, LE12 9EG**

To operate a coating activity at:

**Bradgate Containers Ltd,****Leicester Road Shepshed, Loughborough, LE12 9EG**

subject to the conditions outlined in this document. The conditions contained herein shall apply from the date of the Permit unless otherwise stated.

Name	Date
Ann Green	18/02/2019

Authorised on behalf of Charnwood Borough Council

Permit issued by:

Regulatory Services, Environmental Protection Southfields, Southfields Road, Loughborough, Leicestershire LE11 2TX

## Introductory note

### ***This introductory note does not form a part of the permit***

The following Permit is issued under the Environmental Permitting (England and Wales) Regulations 2016 (SI 2016/1154), as amended, (“the EP Regulations”) to operate an installation carrying out one or more of the activities: namely:

“Any process applying to a substrate, or drying or curing after such application, printing ink or paint or any other coating material as, or in the course of, a manufacturing activity, where the process may result in the release into the air of particulate matter or of any VOC and is likely to involve the use in any period of 12 months of 5 tonnes or more of organic solvents”

## **Status Log**

The status log of the permit sets out the permitting history, including any variations issued.

<b>Detail</b>	<b>Date</b>	<b>Comment</b>
Deemed Application	8 December 1997	Duly made
Permit issued	17 February 1999	EPA permit issued
Variations Notice	15 April 2002	Revised permit issued
Variations Notice	14 February 2006	Revised permit issued
Variations Notice	30 May 2008	Revised permit issued
Variations Notice	6 April 2010	Revised permit issued
Variation Notice	24 March 2011	Revised permit issued
Variation Notice	18 February 2013	Revised permit issued
Variation Notice	30 April 2014	Revised permit issued
Variation Notice	6 March 2017	Revised permit issued
Variation Notice	18 February 2019	Revised permit issued

## **Origins of the conditions contained in the permit**

The Secretary of State has issued various guidance notes to local authorities to assist with determining conditions. The conditions within this permit have been derived from the following guidance note;

PG 6/23 (11) Guidance for Coating of Metal and Plastic Processes (as amended)

## **Process Description**

The purpose of these premises is the coating of metal components using a variety of organic solvent and water based paints within booths, in the manufacture of acoustic enclosures. The annual quantity of solvents consumed is currently between 5-15 tonnes in any 12-month period. The painting is by spray, roller or brush application.

There are 4 spray booths at this installation; three are located in the main factory building, with an additional Dalby Genesis Q type booth in a separate unit (shown on Appendix 2/074). These are all dry backed filter booths and are served by 5 stacks. There is a single paint store. The waste storage area is located to the rear of the site (shown on

Appendix 2/074). Waste solvents are re-cycled and empty cans washed in the can-wash before crushing.

**Principle Emissions**

The key emissions from the installation consist of Volatile Organic Compounds (VOC) and Particulate Matter from the preparation, application and curing of coatings together with fugitive emissions.

The installation boundary and key items of equipment mentioned in permit conditions are shown in the Appendices attached to this permit.

**End of Introductory Note**

The above named company is permitted to operate the activities and/or associated activities as specified in table 1 below: -

**Table 1: Activities**

Description of specified activity	Limits of specified activity
Metal coating activity	From the receipt of raw materials onto the site to the dispatch of finished products, and handling storage and removal of waste.

Subject to compliance with the following conditions:

## Permit Conditions

### Emission Limits, monitoring and other provisions

- The following non-VOC emission limits and monitoring frequencies shall apply.

**Table 2: Non VOC Emission Limits**

Substance	Source	Emission Limit	Monitoring Method	Monitoring Frequency	Monitoring Method
Particulate Matter	All process activities -stacks 1-5	50mg/Nm <sup>3</sup> as 30 minute mean for contained sources	In accordance with BS EN 13284-1 (or equivalent) with averages taken over operating periods excluding start-up and shutdown	One Stack every 2 years on a rolling programme, excluding Stack 1 (As agreed with the regulator)	Manual extractive testing.

Note 1: The reference conditions for emission limits in this section are: 273.15K, 101.3kPa, without correction for water vapour content, unless stated otherwise.

Note 2: Stack one on the main factory shall only be used in combination with extraction units 2 or 3.

### VOC Emissions – Solvent Reduction Scheme

- VOC emissions from the installation shall comply with the Target Emission calculated for the site. The target emission shall be calculated by multiplying the total mass of solids in the coatings used, over the time frame in which the emission is being calculated (that is annually), with the figure given in Table 3 below. Compliance shall be achieved if the Annual Actual Solvent Emission of the installation is less than or equal to the "Target Emission".

**Table 3: Reduction Scheme: Target Emission Figures**

Target Emission Value (Consumption Over 15 Tonnes)	
5-15 tonnes Solvent Consumption	Total Mass of Solids X 0.6
Over 15 tonnes Solvent Consumption	Total Mass of Solids X 0.37

A summary of the calculation required is given below: The target emission shall be calculated as follows:-

- Total mass of solids in the quantity of coatings consumed in the activity in the inventory period (Jan – Dec)

---

b) The target emission over the same period is equal to :-

**the result of paragraph (a) x figure detailed in table 3 above**

3. Calculate your emissions and demonstrate compliance with the target emission detailed above. Details of this calculation and evidence of compliance must be submitted to Charnwood Borough Council by the 31 March each year.

#### **Solvent Management Plan**

4. A Solvent Management Plan (SMP) shall be produced annually by the operator and submitted to Charnwood Borough Council by 31 March each year. This shall be used to determine the actual consumption of organic solvent (the total mass of organic solvent inputs minus any solvents sent for reuse/recovery off-site) and fugitive emissions from the installation. The SMP shall cover the period of 1 January to 31 December of the previous year. The SMP shall also include an emission reduction plan detailing how the operator intends to reduce solvent consumption and increase the use of high solid coating materials, together with justification for the company's marketing and purchasing policies.

#### **Designated Risk Phrase Materials, Emission Limits and Conditions**

5. No substances or materials which because of their VOC content have designated risk phrases R45, R46, R49, R60 and R61 or hazard statement H340, H350, H350i, H360D, or H360F assigned to them shall be introduced at the installation without the prior notification and permission of Charnwood Borough Council.
6. Designated materials because of their halogenated VOC content with risk phrases R40 or R68 and hazard statement H341 or H351 shall be controlled under contained conditions as far as is technically and economically feasible.

#### **Monitoring, investigation and recording**

7. The operator shall keep records( log book) of all inspections, tests and monitoring, (including all non-continuous monitoring and visual assessments) of the permitted activity. Records and continuous monitoring charts shall be kept on site, retained by the operator for a minimum of two years and made available for examination by an authorised officer of Charnwood Borough Council.

#### **Information required by the regulator**

8. The operator shall provide a list of key abatement plant to Charnwood Borough Council and shall have a written procedure for dealing with its failure.
9. The operator shall notify Charnwood Borough Council at least 7 days in advance of any periodic monitoring exercise to determine compliance with emission limit values. This shall state the provisional time and date of monitoring, pollutants to be tested and the methods to be used.

- 
10. The results of all non-continuous emission testing shall be forwarded to Charnwood Borough Council within 8 weeks of the completion of sampling.
  11. In the event of any adverse results from any monitoring activity (both continuous and non-continuous) the Operator shall investigate as soon as the monitoring data has been obtained. The Operator shall:
    - ) Identify the cause and take corrective action;
    - ) Clearly record as much detail as possible regarding the cause and extent of the problem;
    - ) Record the remedial action taken by the Operator to rectify the situation;
    - ) Re-test to demonstrate compliance as soon as possible; **and**
    - ) Notify Charnwood Borough Council of the steps taken and the re-test results.

### Visible and odorous emissions

12. There shall be no visible airborne emissions from any part of the process. All releases to air, other than condensed water vapour, shall be free from droplets and persistent visible emissions.
13. A visual assessment of emissions from the installation shall be made at least once per day in order to establish that no visible airborne emission has occurred. Observation positions must provide an unimpeded view of the emission points and must be at appropriate locations around the installation boundary. The results of all such observations shall be recorded.
14. There shall be no offensive odour beyond the site boundary, as perceived by an authorised officer from Charnwood Borough Council (the regulator). Where there are problems that, in the opinion of the regulator may be attributable to the installation the operator shall undertake an inspection and assessment to determine which operation(s) is the cause. Once the source of the emission is known, corrective action shall be taken by the operator to rectify the problem without delay.

### Abnormal events

15. When any visible airborne emission is observed or when any abnormal emission, malfunction or breakdown leading to a significant escape of particulate matter, odour or fume occurs, the operator shall:-
  - i. Investigate and undertake remedial action **immediately**;
  - ii. Adjust the process or activity to minimise the emissions; **and**
  - iii. Promptly record (within 1 working day) the events and actions taken.
16. All malfunctions or breakdowns leading to an abnormal emission likely to have an effect on the local community or failure of key arrestment plant (for example, filters) shall be notified to Charnwood Borough Council immediately by telephone. A record shall be made of the incident.

- 
17. In cases where non-compliance is likely to cause an immediate danger to human health or threatens to cause an immediate significant adverse affect upon the environment, the operation of the activity must be suspended.

### **Calibration and Compliance Monitoring**

18. For extractive testing the sampling shall meet the following requirements:
- a) Batch processes, where the production operation is completed within 2 hours, then extractive sampling shall take place over a complete cycle of the activity.
  - b) For activities that are continuous or have a batch cycle that is not compatible with the time available for sampling, then the data shall be obtained over a minimum period of 2 hours in total.
19. The introduction of dilution air to achieve the emissions concentration limits specified in Table 2 above shall not be permitted.

### **Representative Sampling**

20. Stacks or duct-work that require access for extractive monitoring shall be fitted with facilities for sampling which allow compliance with the sampling standards.

### **Control Techniques**

#### **VOC and odour control - storage**

21. The receipt, handling and storage of organic solvents shall be carried out so as to minimise the emission of volatile organic compounds to air.
22. Coatings and raw materials containing VOC's (including thinners and cleaning solvents) shall be stored in closed storage containers.
23. All VOC storage containers shall be stored within bunded enclosed areas, except for point of use containers. The bunding shall be impervious, resistant to liquids and capable of holding 110% of the capacity of the largest stored container.

#### **VOC control – handling**

24. All vessels or containers containing materials with an organic solvent content shall be lidded or enclosed when not in use.
25. All mixing, emptying and transfer of coatings or raw materials containing VOC's shall be undertaken in covered or closed containers.

#### **VOC control – spray booths**

26. All paint spraying operations shall be carried out in the spray booths.

- 
27. Emissions from the spray booths shall be vented to filters in order to ensure compliance with condition 1 of this permit. These filters shall be inspected at least weekly and replaced as necessary. Records of filter replacement shall be kept on site.
  28. All new spray booths shall be with a guarantee from the spray booth manufacturer that the booth will meet the emission limit specified in condition 1 of this permit.
  29. All spray gun testing and spray out, following cleaning shall be carried out in accordance with a written procedure a copy of which shall be made available to an authorised officer of Charnwood Borough Council upon request. This should include a requirement that spray gun flushing following cleaning should be directed into the equipment cleaning machine with the extractor running or into a receptacle to collect the solvent, which is then put through the spray gun. When not in use, the receptacle should be kept lidded to prevent the evaporation and fugitive emission of solvent vapour.

#### **VOC Control – cleaning (including surface cleaning)**

30. Cleaning operations involving organic solvents shall be periodically reviewed, at least once every 2 years, to identify opportunities for reducing VOC emissions (e.g. cleaning steps that can be eliminated, or alternative cleaning methods). A copy of this review shall be provided to Charnwood Borough Council on request.
31. Where equipment is cleaned off-line, it shall be carried out using enclosed cleaning machines wherever possible.
32. The application of cleaning solvents shall be from a contained device, such as a piston type dispenser. Alternatively, pre-impregnated wipes shall be used which shall be stored in an enclosed container prior to use.

#### **VOC Control – Operational**

33. A programme to monitor and record the consumption of coatings/organic solvents against product produced shall be used to minimise the amount of excess organic solvent used.

#### **VOC Control-Waste**

34. All organic solvent contaminated waste materials shall be stored in closed containers.
35. Prior to disposal, empty drums and containers contaminated with organic solvent shall be kept closed and labelled so that all personnel who handle them are aware of their content and hazardous properties.
36. Prior to disposal, used wipes or other items contaminated with organic solvent shall be placed in suitably labelled metal bins fitted with a self-closing lid.



---

**Dust and spillage control**

37. Dusty wastes shall be stored in closed containers and handled in a manner that avoids emissions.
38. Organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas. All spillages and leaks of VOC shall be cleaned up immediately and the collected material held in an enclosed container pending removal from site.

**Stacks, Vents and Process Exhausts**

39. Process stacks and vents shall not be fitted with any restriction at the final opening, for example, a plate, cap or cowl. All discharge points shall be vertically upwards.

**Training**

40. Staff at all levels shall receive the necessary training and instructions in their duties relating to control of the process and emissions to air. Particular emphasis shall be given to;
  - ) Awareness of their responsibilities under this permit in dealing with conditions likely to give rise to VOC emissions, such as in the event of spillage;
  - ) Minimising emissions during start up and shut down;
  - ) Action to take to minimise emissions during abnormal conditions, accidents or spillages.
41. The operator shall maintain a statement of training requirements for each operational post and keep a record of the training received by each person. These documents shall be made available for inspection to an authorised officer of Charnwood Borough Council on request.

**Maintenance**

42. The operator shall have available for inspection by an authorised officer from Charnwood Borough Council:
  - ) A Written maintenance and inspection programme for all pollution control equipment; **and**
  - ) A record of all maintenance that has been undertaken.

**Standard Conditions**

43. If the operator proposes to make a change in the operation of the installation, he shall, at least 14 days before making the change, notify Charnwood Borough Council in writing. The notification must contain a description of the proposed

change. In this condition 'change of operation' means a change which may affect the substances or concentration of substances being emitted to air.

**End of Conditions**

**Site Location Plan**

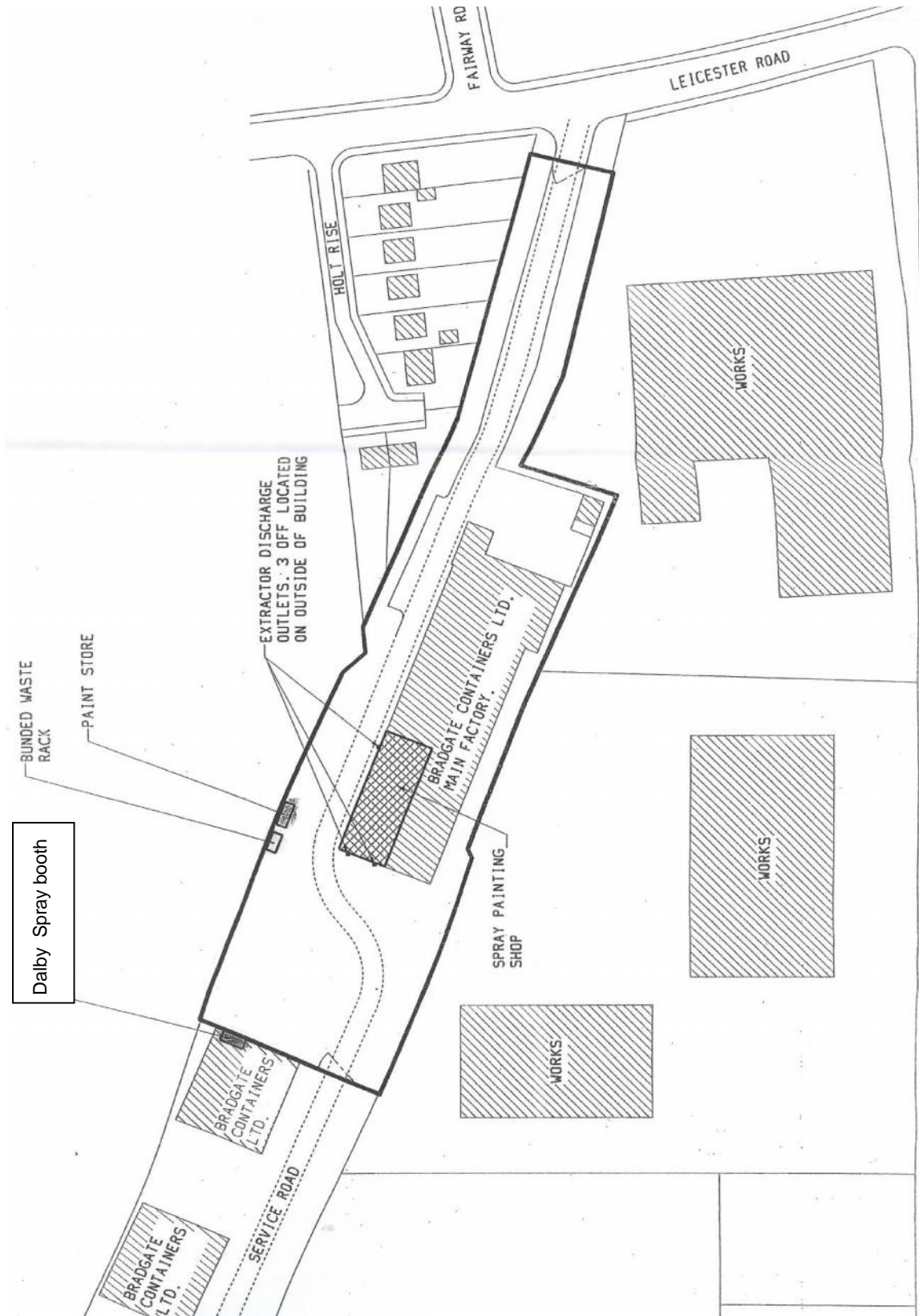
**Figure 1/074**

*“Reproduced from the Ordnance Survey map with the permission of the Controller of Her Majesty’s Stationery Office Crown Copyright 2000. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings”.*



Site Layout Plan

Figure 2/074



## Explanatory Notes

**These notes do not comprise part of the permit but contain guidance relevant to it.**

### Inspections

Regular inspections will be made by officers of Charnwood Borough Council (without prior notice), in order to check and ensure full compliance with this permit.

### BAT ( Best Available Techniques)

The Permit includes conditions that have to be complied with. It should be noted that aspects of the operation of the installation which are not regulated by conditions of the Permit are subject to the implied condition that the Operator shall use the best available techniques for preventing or, where that is not practicable, reducing emissions from the installation. Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

### Change in Operation of the Installation

If you, the operator proposes to make a change in operation of the installation you must at least 14 days before making the change, notify Charnwood Borough Council 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. A 'change in operation' means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.

### Health and Safety at Work and Other Statutory Requirements

The responsibility you have under legislation for Health, Safety and Welfare in the workplace remains in force. In addition, the Permit does not relieve you of your obligations to obtain planning permission, hazardous substances consent, discharge consent from the Environment Agency, Building Regulations approval, or some Waste Disposal Licences.

### Submission of Information

Note that the Permit requires the submission of certain information to the Local Authority (LA). In addition, the LA has the power to seek further information at any time under the EP Regulations provided that it acts reasonably.

### Public Registers

Considerable information relating to Permits including the Application is available on public registers in accordance with the EP Regulations. Certain information may be withheld from public registers where it is commercially confidential or contrary to national security. The onus is on the Operator to provide a clear justification for each item to be kept from the register. Applications for information to be excluded from the Public Register on grounds of National Security should be made to the Secretary of State.

### Variations to the Permit

This Permit may be varied in the future (by the LA serving a Variation Notice on the Operator). If the Operator itself wants any of the Conditions of the Permit to be changed, it must submit a formal Application. The Status Log within the Introduction will include summary details of this Permit, variations issued up to that point in time and state whether a consolidated version of the Permit has been issued.

### Surrender of the Permit

Where the Operator intends to cease the operation of an installation (in whole or in part) The LA should be informed in writing, such notification must include the information specified in the EP Regulations.

### Transfer of the Permit or part of the Permit

Before the Permit can be wholly or partially transferred to another person, an Application to transfer the Permit has to be made jointly by the existing and proposed holders. A transfer will be allowed unless the LA considers that the proposed holder will not be the person who will have control over the operation of the installation or will not comply with the conditions of the transferred Permit.

### Annual Subsistence Fee

Under the EP Regulations the holder of a permit is required to pay a fee for the subsistence of the permit. This fee is payable annually on 1st April. You are advised that under the provisions of the EP Regulations, if you fail to pay the fee due promptly, Charnwood Borough Council may revoke the permit. You will be contacted separately each year in respect to this payment.

### Talking to us

Please quote the Permit Number if you contact Charnwood Borough Council about this Permit. To contact Charnwood Borough Council please use the telephone number 01509 634636 or any other number notified in writing to the Operator by Charnwood Borough Council for that purpose.

### **Right To Appeal**

Anyone who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State. Appeals must be sent within 6 months from the date of the permit (normally the date on the bottom of the permit).

Appeals should be addressed as follows:-

The Planning Inspectorate  
Environmental Appeals Administration  
Room 4/19 Eagle Wing  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol BS1 6PN

An appeal will not suspend the effect of the conditions appealed against; the conditions must still be complied with.

There are no forms or charges for appealing. However for an appeal to be valid, appellants are legally required to provide information detailed below:

- i. A statement of the grounds of appeal
- ii. A copy of any relevant permit
- iii. A copy of any relevant correspondence between the appellant and the regulator
- iv. 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.

At the same time, the notice of appeal and documents (i) and (iv) must be sent to the Council.

In determining an appeal against one or more conditions, the Regulations allow the Inspector or Secretary of State to affirm or quash conditions or to add new conditions

You will be liable for prosecution if you fail to comply with the conditions of this permit. If found guilty, the maximum penalty for each offence if prosecuted in a magistrates Court is an unlimited fine and/or 12 months imprisonment. In a Crown Court it is an unlimited fine and/or a 5 years imprisonment.

Our enforcement of your permit will be in accordance with the Regulator's Compliance Code.