

EP Permit ref: B11/94

Variation ref: PPC 21/09

Variation Notice

From: HuntingdonshireDistrict

Council ("the Council")

To: (1)

VIP Polymers Ltd
C/o GIL Investments
Unit 5
Timothy's Bridge Road
Stratford Upon Avon
CV37 9ND

The Council, in the exercise of the powers conferred upon it by regulation 20 of the Environmental Permitting (England and Wales) Regulations 2007 ⁽²⁾ ('the 2007 Regulations') hereby gives you notice as follows-

The Council has decided to vary the conditions of permit reference B11/94 granted under [regulation 10(2) of the Pollution Prevention and Control (England and Wales) Regulations 2000] [regulation 13(1) of the 2007 Regulations] in respect of the operation of the installation/mobile plant at:

VIP Polymers Ltd
15 Windover Road
Huntingdon
PE29 7EB

The variation of the conditions of the permit and the date(s) on which they are to take effect are specified in [Schedule 1] to this notice. [A consolidated permit as varied by this notice ~~and by~~ ~~variation notices ref~~ is set out in Schedule 2].]

~~[You are hereby required to pay by no later than the sum of £~~
~~- the fee prescribed in respect of a variation notice in the relevant charging scheme made under~~
~~regulation 65 of the 2007 Regulations [and] [or] section 41 of the Environment Act 1995 for~~
~~LA-IPPC only where there are separate charges in relation to water discharges ⁽³⁾.]~~

Signed on behalf of HuntingdonshireDistrict

Council

Dated 12th January 2010

Signed

Designation Head of Environmental and Community Health Services

An authorised officer of the Council

(1) The operator at the address shown on permit / application.

(2) SI 2007/3538

(3) 1995 c.25.

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Schedule 1

| Variation to the conditions of the permit | Date(s) on which the variation is to take place |
|---|---|
| Vary all permit conditions | 12th January 2010 |

Signed on behalf of Huntingdonshire District

Council

Dated 12th January 2010

Signed

JA

Designation Head of Environmental and Community Health Services

An authorised officer of the Council

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Schedule 2

Permit reference B11/94 as varied by this notice and
~~variation notices~~

(Insert amended or full consolidated permit).

See attached

PERMIT

Pollution Prevention and Control Act 1999

Environmental Permitting (England and Wales) Regulations 2007

Permit Reference No: B11/94

Huntingdonshire District council (the regulator) hereby permits VIP Polymers Ltd, C/O GIL Investments, Unit 5, The Courtyard, Timothy's Bridge Road, Stratford Upon Avon, CV37 9NP to operate an activity involving rubber process as defined in Part 2 of Schedule 1 to the EP Regulations Section 6.7, and as described below in accordance with the following conditions which shall apply forthwith.

Address of permitted activity: VIP Polymers Ltd
15 Windover Road
Huntingdon
Cambridgeshire
PE29 7EB

Description of Activity

The process is prescribed for Local Authority Air Pollution Control under Section 6.7 of Schedule 1 to the Environmental Permitting (England and Wales) Regulations 2007. B11/94(a) shows a location plan of the installation.

The process consists of the mixing, milling and blending of synthetic and natural rubbers with carbon black and other ingredients and the subsequent conversion of the resultant compound to a finished product by extrusion and curing. Some of the finished product range includes metal components and the overall process therefore includes surface finishing and degreasing facilities. There are a total of 46 points of discharge to the external air from the process.

The first part of the process takes place in the mixing department where the ingredients are prepared according to specification. Carbon black is supplied in polyethylene intermediate bulk containers (IBCs) which are connected to a pneumatic transport system to ensure covered conveyance to the bulk powders table. The carbon black and other power ingredients are weighed into steel bins for transport to the Banbury mixers.

The rubber polymers, both natural and synthetic, are introduced to the Banbury mixers in pre-cut blocks. Process oils are also added directly to the mixers and these are held in bulk containers outside/inside the factory. The two external containers are situated within a bund which has a capacity of 110% of the larger container. Fumes are extracted at the entrance to the mixers and from the bulk and small powder tables. The dust laden air is conveyed to a dust arrestment system with reverse air jets for cleaning purposes. The system discharges

to the external air via a 2m stack, which has a PCME continuous indicative monitor for particulate matter emissions. This stack is identified as number 44. If the particulate matter emissions exceed the emission concentration limit, visual and audible alarms are activated.

The ingredients in the Banbury mixers reach a temperature of 70-160°C resulting in the production of a rubber mix which is transferred to two 1-roll mill where further blending takes place. The mill is connected to an independent mechanical extraction ventilation system for the removal of rubber fume. These systems discharge directly to the external air via one duct which terminates 2m above the factory roof and is known as stack 43.

On completion of the procedures described above the product is cut into 4" wide strip. This is slit in half, placed in a forced air drying oven, then fed to a spool or wig-wagged onto a crate. This material is then stored until required by manufacturing.

The final stage of the process takes place in the manufacturing area where the uncured rubber compound is subject to further processing. There are three production operations, injection moulding, compression moulding and blanking extrusion. Mechanical extract ventilation systems serve these production processes and these discharge to the external air via a series of ducts which discharge between 1-3m above the factory roof.

Conditions

| | Substance | Source | Emission limit/ Provisions | | Type of monitoring | Monitoring frequency |
|----|-----------------------|--|-------------------------------------|---------------------|------------------------------|--------------------------------------|
| 1. | Particulate matter | All processes/ activities using carbon black | 10mg/Nm ³ ⁽¹⁾ | | Manual extractive testing | Annual ⁽²⁾ ⁽³⁾ |
| | | | | | Monitoring and recording | Continuous |
| 2. | Particulate matter | From any other source | 50mg/Nm ³ ⁽¹⁾ | | Manual extractive testing | Annual ⁽²⁾ ⁽³⁾ |
| 3. | VOC | All processes | Coating | 5 tonnes (4) | Manual calculation | Annual |
| | | | Degreasing | 2 tonnes (4) (5) | | |

(1) As 30 minutes mean for contained sources
(2) Testing to be undertaken in accordance with relevant British Standard as described in PG6/28 (04) or subsequent versions.
(3) Frequency may be varied if meets requirements described in PG6/28 (04) or subsequent versions.
(4) Any exceedences of this limit and a variation application shall be submitted.
(5) For degreasing solvents using risk phases R40, R45, R46, R49, R60 & R61 the limit shall be 1 tonne per year.

- 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 methods to be used.
- The results of non-continuous emission testing shall be forwarded to the regulator within 8 weeks of the completion of the sampling.
- A summary report of the continuous monitoring results shall be provided to the regulator on an annual basis.

8. The operator shall keep records of inspections, tests and monitoring, including all non-continuous monitoring, inspections and visual assessments. In such cases:
 - Current records shall be kept on site and made available for the regulator to examine.
 - Records shall be kept by the operator for at least two years.
8. Adverse results from any monitoring activity (both continuous and non-continuous) shall be investigated by the operator as soon as the monitoring data has been obtained/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.
 - Notify the regulator.
9. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the operator shall:
 - Investigate immediately and undertake corrective action.
 - Adjust the process or activity to minimise those emissions.
 - Promptly record the events and actions take.
10. The regulator shall be informed without delay:
 - If there is an emissions that is likely to have an effect of the local community.
 - In the event of the failure of key abatement plant.
11. All appropriate precautions shall be taken to minimise emissions during start-up and shutdown.
12. All releases to air, other than condensed water vapour shall be free from persistent visible emissions.
13. All emissions to air shall be free from droplets.
14. There shall be no offensive odour beyond the site boundary, as perceived by the regulator.
15. Dilution air may be added for waste gas cooling or improved dispersion where justified, but this shall not be considered when determining the mass concentration of the pollutant in the waste gases.
16. A minimum discharge velocity shall be required in order to prevent the discharge plume being effected by aerodynamic down wash.
17. 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.
18. Stacks or vents shall not be fitted with any restriction at the final opening such as a plate or cowl, with the exception of a cone which may be necessary to increase the exit velocity of the emissions.
19. Operations likely to generate particulate matter where the discharge volume flow rate is greater than $50\text{m}^3/\text{minute}$ shall be continuously monitored to indicate the performance of the abatement plant, by using equipment such as a pressure drop indicator.

20. All continuous monitoring readings shall be on display to appropriately trained operating staff.
21. All continuous monitors shall be operated, maintained and calibrated or referenced in accordance with the manufacturers' instructions. The relevant maintenance and calibration or referencing shall be recorded, and such records made available for inspection by the regulator.
22. All new continuous monitoring equipment shall be designed for less than 5% downtime over any 3 month period.
23. Instruments shall be fitted with audible and visual alarms, situated appropriately to warn the operator of abatement plant failure or malfunction. The activation of alarms shall be automatically recorded.
24. Empty bags which have contained carbon black shall be placed in a closed container immediately after emptying by a method which minimises the emission of particulate matter.
25. All dust or potentially dusty materials including dusty wastes shall be stored in silos, in confined storage, or in fully enclosed containers/ packaging. Where the storage is open, suitable precautions shall be taken to prevent wind whipping.
26. When delivery to bulk storage tank takes place, displaced air shall either be vented to suitable arrestment place or back vented to the delivery tanker, in order to minimise emissions. Arrestment plant fitted to silos shall be of sufficient size to avoid pressurisation during delivery.
27. Where possible, dusty materials shall be replaced by oiled powders or pellets.
28. The use of dusting, supporting and "anti tack" powders shall be minimised and emissions produced shall be adequately contained. The aim shall be to replace dusting powers for example with plastic or textile sheets, compressed lubricant powder in blocks or anti tack liquids, where the process characteristics permit.
29. The automatic mechanical discharge of residues collected by particulate matter arrestment equipment shall be continuously indicatively monitored to detect blockage. The monitor shall be fitted with a visual and audible alarm which shall activate in the case of outlet blockage.
30. All potentially odorous materials including waste materials shall be stored in suitable closed containers or bulk storage vessels, where appropriate vented to suitable abatement plant.
31. All fixed storage tanks shall be fitted with high-level alarms or volume indicators to warn of overfilling. Where practicable the filling systems shall be interlocked to the alarm system to prevent overfilling.
32. Delivery connections to bulk storage tanks shall be located within a bunded area. Bunding shall:
 - Completely surround the bulk liquid storage tanks
 - Be impervious and resistant to the liquids in storage;
 - Be capable of holding 110% of the capacity of the largest storage tank

33. 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.
34. Where practicable, fixed equipment shall be cleaned in-situ, and such equipment shall, where practicable, be kept enclosed whilst cleaning is carried out. Where equipment is cleaned off-line, cleaning shall be carried out using enclosed cleaning systems, wherever possible.
35. Where practicable in relation to the technical characteristics of the process low volatility process or extender oils shall be used.
36. Dry sweeping of dusty materials shall not normally be permitted unless there are environmental or health and safety risks in using alternative techniques.
37. Training of all staff with responsibility for operating the process/activity shall include:
- Awareness of their responsibilities under the permit.
 - Minimising emissions on start up and shut down.
 - Action to minimise emissions during abnormal conditions.
38. The operator shall maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment. These documents shall be made available to the regulator upon request.
39. The process operator shall develop a list of key plant and shall have a written plan for dealing with its use and any failure, in order to minimise any adverse effects.
40. A written maintenance and cleaning, including stacks and ductwork programme shall be developed with respect to pollution control equipment. A record of such maintenance shall be made available for inspection by the regulator.
41. Spares and consumables – in particular, 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.

Signed:  PA Date: 12 January 2010
Head of Environmental and Community Health Services

GENERAL NOTES

1 Best available techniques

The best available technique shall be used to prevent or, where that is not practicable, reduce emissions from the installation or mobile plant in relation to any aspect of the operation of the installation or mobile plant which is not regulated by any other condition of this permit.

2 Variation

The regulator will ensure that the permit remains up to date in line with the requirements set out in Regulation 20(1). This may involve issuing a Variation Notice following amendment to the Secretary of State's Guidance Notes or following receipt of any direction from the Secretary of State.

3 Review of Conditions

The regulator may at any time undertake a review of the conditions in this permit under Regulation 34(1). Where significant pollution is encountered or where there are changes in BAT or where the operational safety of the activity requires other techniques to be used an immediate review shall be undertaken.

4 Appeal

The permitted operator can appeal in writing to the Secretary of State against the items listed in Regulation 31.

5 Transfer of Permit

The permitted operator who wishes to transfer the whole or part of the permit to a person who proposes to carry out the activity in the holder's place may do so in accordance with Regulation 21. Both the operator and the proposed transferee shall jointly make an application to the regulator to effect the transfer. An application shall include the permit and any fee prescribed in respect of the transfer under Regulation 19 and shall contain the operator's and the proposed transferee's contact details.

6 Notification of Proposed Change of Operation

If the operator proposes to make a change in operation of the installation, they 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. Change of operation means a change in the nature of functioning, or an extension, of the installation, which may have consequences for the environment.

7 Variation of Conditions of Permits

Under Regulation 20, the operator may apply to the regulator to vary the conditions contained within the permit. Such application shall be made in accordance with Part 1 of Schedule 5 and shall be accompanied by any fee prescribed in respect of the application under Regulation 19; and paragraphs 8 of Part 1 of Schedule 5 and paragraphs 5(3) and (4) of schedule 5 shall have effect with respect to such applications.

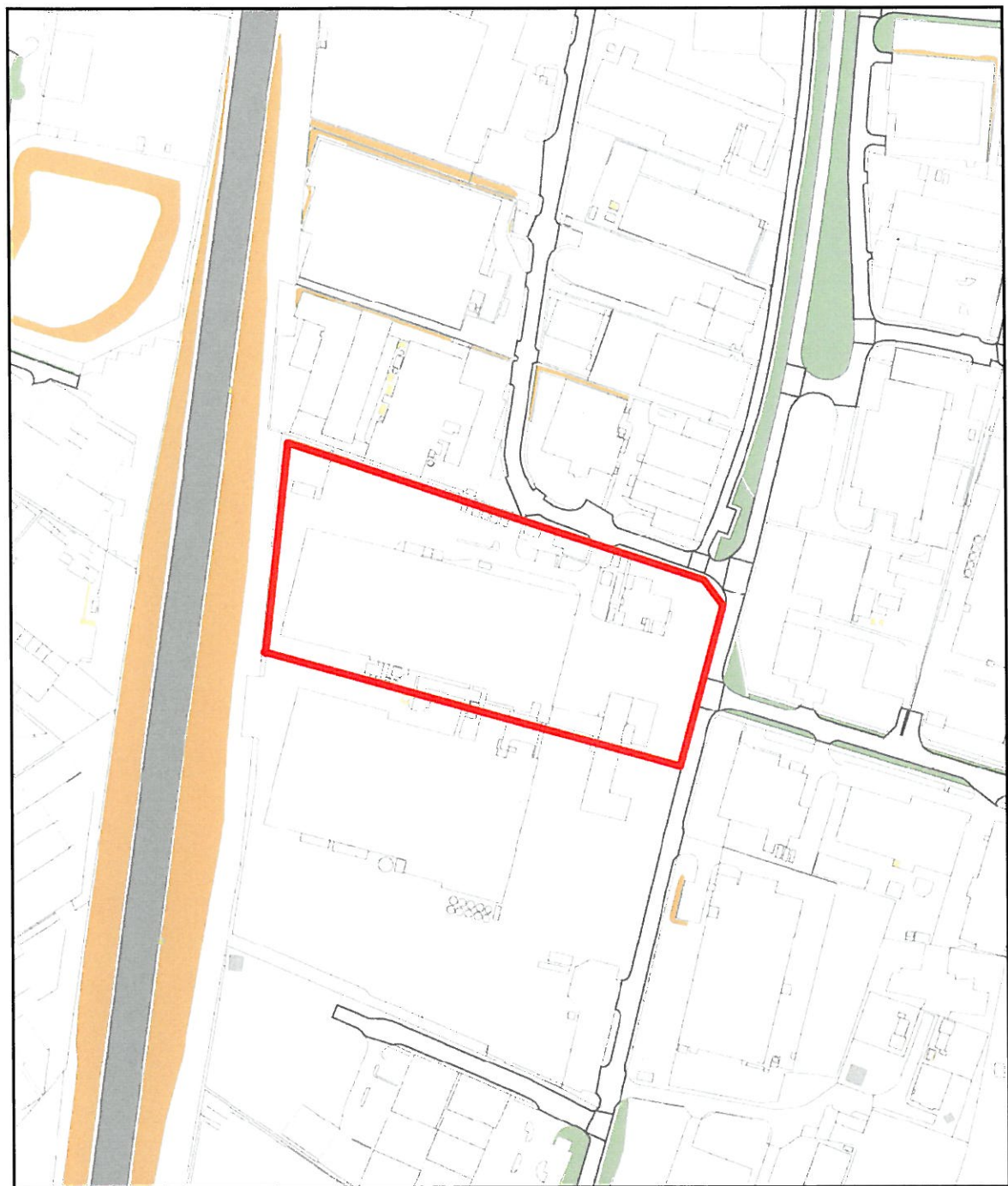
8 Other Legal Requirements

This permit is issued solely for the purpose of the Pollution Prevention and Control Act and its associated Regulations and the operator must ensure that he complies with all other statutory requirements.

9 Annual Subsistence Charge

The Secretary of State has drawn up a charging scheme under Regulation 19. Under this scheme Local Authorities are required to levy an annual subsistence charge related to the permit. The Local Authority will invoice for the amount due which is subject to annual review by the Department of the Environment Food and Rural Affairs.

B11/94 (a) Location plan



Kilometers
0.0 0.03 0.06 0.09 0.12



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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 at <http://www.defra.gov.uk/environment/ppc/localauth/pubs/guidance/manuals.htm>.

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(1) (b) of the 2007 Regulations. A person guilty of an offence under this regulation could be liable to (i) a fine of up to £20,000 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 2007 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 or 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 2007 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 2007 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

Or for appeals in Wales:

The Planning Inspectorate
Crown Buildings
Cathays Park
CARDIFF
CF10 3NQ

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, ie 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.