POLLUTION PREVENTION AND CONTROL ACT 1999
Environmental Permitting (England and Wales) Regulations 2010, Regulations [20] [and 18]

EP Permit ref: B01/02 Variation ref: PPC 13/11

Variation Notice

From: Huntingdonshire District Council ("the Council")

To: (1)

Paxford Composites Ltd
2-4 Redwongs Way
Huntingdon
PE29 7HB

The Council, in the exercise of the powers conferred upon it by regulation 20 of the Environmental Permitting (England and Wales) Regulations 2010 (2) ('the 2010 Regulations') hereby gives you notice as follows-

The Council has decided to vary the conditions of permit reference B01/02 granted under [regulation 10(2) of the Pollution Prevention and Control (England and Wales) Regulations 2000] [regulation 13(1) of the 2010 Regulations] in respect of the operation of the installation/mobile plant at:

Paxford Composites Ltd
2-4 Redwongs Way
Huntingdon
PE29 7HB

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 2010 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 Huntingdonshire District Council

Dated 31 May 2011 Signed

Designation Head of Environmental & Community Health Services

An authorised officer of the Council

(1) The operator at the address shown on permit / application.
(2) SI 2010/675
(3) 1995 c.25.

Delete words in square brackets which do not apply.

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EP Permit ref: B01/02

Variation ref: PPC 13/11

Schedule 1

Variation to the conditions of the permit	Date(s) on which the variation is to take place
Vary all permit conditions	31 May 2011

Signed on behalf of Huntingdonshire District Council

Dated 31 May 2011

Signed

Designation Head of Environmental & Community Health Services

An authorised officer of the Council

Huntingdonshire
DISTRICT COUNCIL

PERMIT

Pollution Prevention and Control Act 1999

Environmental Permitting (England and Wales) Regulations 2010

Permit Reference: **B01/02**
As varied by: **PPC03/07 & PPC09/08**

Huntingdonshire District Council (the regulator) hereby permits Paxford Composites Limited 2-4 Redwongs Way Huntingdon PE29 7HB to operate a coating process as defined in Part 2 of Schedule 1 to the EP Regulations Section 6.4 Part B(a)(iv), and as described below in accordance with the following conditions which shall apply forthwith.

Address of permitted activity: Paxford Composites Ltd
2-4 Redwongs Way
Huntingdon
PE29 7HB

Location plan can be seen on B01/02 (a) Location plan

Description of Activity

The process produces components for the aerospace, automotive, satellite communications, marine, rail, training and facsimile structures, motor sport and simulation industries.

The components are constructed by producing jigs and laying fibre reinforced thermosetting resin composites to build up the component to the desired specifications. The fibre reinforced thermosetting resin composites fall within two main categories, fibre type and resin type.

The final components are coated in one of three spraybooths.

- Paint Booth 1 is a high performance Gemini II spraybooth measuring 9m long x 6m wide x 3m high and is gas heated with spray and bake cycles.
- Paint booth 2 is a Cyclone II Spray bake booth measuring 7m long x 4m wide x 2.5m high.
- Paint booth 3 is a Spray Bake spraybooth measuring 7.2m long x 4.2m wide x 2.4m high.

All three paint booths are mechanically extracted passing through a filter before venting to atmosphere via a stack, the location of each spray booth can be found on B01/02(b) floor plan. The types of coatings which are used include Epoxy, Polyurethane (UVR) and Polyester.

The potential pollutants from the site are volatile organic compounds being released from the solvents, particulate matter, isocyanates and odour from the different stages of production.

Conditions

	Pollutant	Source	Emission limit/ requirement	Monitoring type	Monitoring frequency
1	VOC	Waste gases from drying processes	50 Carbon/Nm^3 (1)	Manual extractive (2)	Annual (3)
2	VOC	Fugitive emissions from the entire process	20% of solvent input	Calculation (4)	Within 12 months then after any equipment modification.
3	VOC	Entire process	Solvent Management Plan	Calculation (4)	Within 12 months then after any equipment modification.
4	VOC	Entire process	Total consumption	Calculation (4)	Annual
5	Particulate matter	Waste gases from drying processes	75 mg/Nm^3 (1)	Manual extractive (2)	Annual (3)
6	Isocyanates	All process using isocyanates	0.1 mg/Nm^3 (1)	Manual extractive (2)	Annual (3)
7	Hazard statements: R40 & R61	Process using R61 (where use is greater or equal to 10g/hr)	2mg/Nm^3 (1)	Manual extractive (2)	Annual (3)
		Process using R40 (where use is greater or equal to 100g/hr)	20mg/Nm^3 (1)	Manual extractive (2)	Annual (3)

(1) The introduction of dilution air to achieve emission concentration limits shall not be permitted.
(2) The reference conditions are: 273.15K, 101.3kPa without correction for water vapour content.
(3) Monitoring frequency may be reduced where there is consistent compliance with emission limits as explained in B01/02(c) Varying of Monitoring Frequency
(4) See B01/02(d) Compliance with SED requirements for guidance.

8. The operator shall keep records of inspections, tests, maintenance and monitoring. In such cases:
   (a) Current records shall be kept on site and made available for the regulator to examine.
   (b) Records shall be kept by the operator for at least two years.

9. Adverse results from any monitoring activity shall be investigated by the operator as soon as the monitoring data has been obtained/received. The operator shall:
   (a) Identify the cause and take corrective action.
   (b) 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.
   (c) Re-test to demonstrate compliance as soon as possible.
   (d) Notify the regulator

10. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the operator shall:
   (a) Investigate immediately and undertake corrective action.
   (b) Adjust the process or activity to minimise those emissions.
   (c) Promptly record the events and actions taken.

11. The regulator shall be informed without delay:
   (a) If there is an emission that is likely to have an effect on the local community.
   (b) In the event of the failure of key abatement plant.

12. In the case of non-compliance causing immediate danger to human health, operation of the activity shall be suspended.

13. The operator shall notify the regulator at least 7 days before any periodic monitoring exercise to determine compliance with emission limit values.

14. The results of non-continuous emission testing shall be forwarded to the regulator within 8 weeks of the completion of the sampling.

15. The operator shall ensure that adequate facilities for sampling are provided on vents or ducts.

16. No substances, preparations or halogenated VOC which have been assigned the Hazard Statement R45, R46, R49 and R60 shall be used on site.

17. Substances, preparations or halogenated VOC which have been assigned the Hazard Statement R40 or R61 shall only be applied in a spray booth.

18. There shall be no offensive odour beyond the site boundary, as perceived by the regulator.

19. The process 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 effects.

20. A written maintenance programme shall be available to the regulator with respect to pollution control equipment.

21. Stacks and ductwork shall be cleaned to prevent accumulation of materials, as part of the routine maintenance programme.

22. 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.

23. Stacks or vents shall not be fitted with any restriction at the final opening such as a plate, cap or cowl, with the exception of a cone.

24. Dusty material, including wastes, shall be stored in closed containers and handled in a manner that avoids emissions.

25. All potentially odorous materials, including wastes, shall be stored in suitable closed containers, where appropriate vented to suitable abatement plant.

26. All measures shall be taken to minimise VOC emissions during mixing.

27. Emissions from emptying of mixing vessels and transfer of materials shall be adequately contained.

28. Application of cleaning solvents shall be:
    (a) From a contained device or automatic system when applied directly on to machine rollers.
    (b) Dispensed by piston type dispenser or similar contained device, when used on wipes.

29. When organic solvent is used on wipes:
    (a) Pre-impregnated wipes shall be held within an enclosed container prior to use.
    (b) Where practicable no organic solvent cleaning fluids or significantly less volatile organic solvents cleaning fluids shall be used.

30. Where practicable, fixed equipment shall be cleaned in-situ, and such equipment shall, where practicable, be kept enclosed whilst cleaning is carried out.

31. All reasonably practicable efforts shall be made to minimise the amount of residual organic solvent bearing material left in drums and other containers after use.

32. Prior to disposal, empty drums and containers contaminated with organic solvent shall be closed to minimise emissions from residues during storage prior to disposal.

33. Training of all staff with responsibility for operating the process/activity shall include:
    (a) Awareness of their responsibilities under the permit; in particular how to deal with conditions likely to give rise to VOC emissions.
    (b) Minimising emissions on start up and shut down.
    (c) Action to minimise emissions during abnormal conditions.

34. 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 regulator on request.

35. The best available techniques 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.

36. 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

Signed: .....

Head of Environmental and Community Health Services

Date: ..31 May 2011..

GENERAL NOTES

1 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.

2 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.

3 Appeal

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

Appeals shall be addressed to:

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

4 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.

5 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.

6 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.

7 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.

B01/02 (a) Location plan

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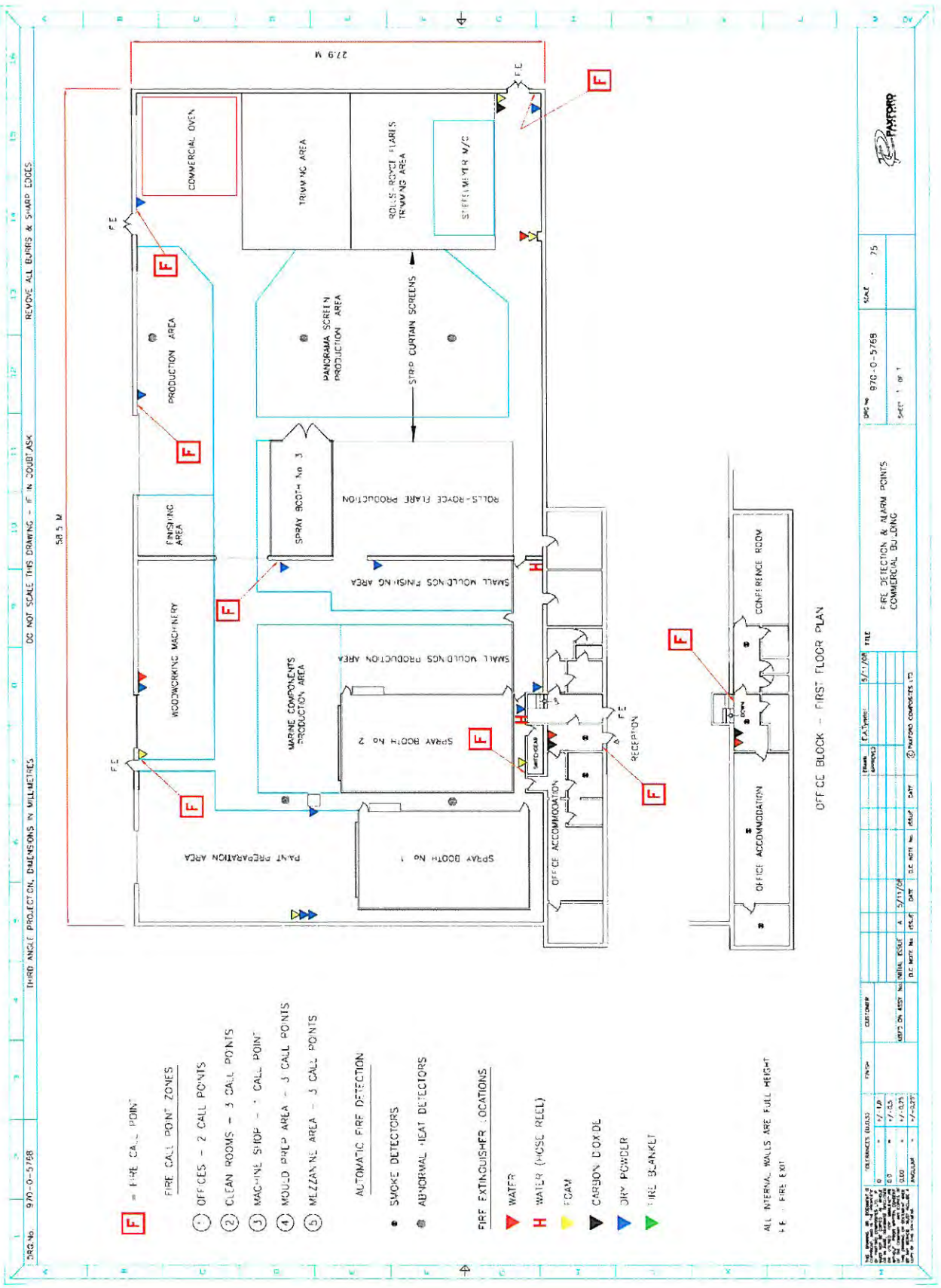
HDC 100022322

B01/02 (b) Floor plan



B01/02 (c) Varying of Monitoring Frequency

Where non-continuous quantitative monitoring is required, the frequency may be varied. Where there is consistent compliance with emission limits, regulators may consider reducing the frequency. When determining "consistent compliance" factors to consider include:

(a) The variability of monitoring results, for example, results which range from 15-45mg/Nm^3, against an emission limit of 50mg/Nm^3 might not qualify for a reduction in monitoring.

(b) The margin between the results and the emission limit, for example, results which range from 45-50mg/Nm^3, against an emission limit of 50mg/Nm^3 might not qualify for a reduction in monitoring.

Consistent complaint should be demonstrated using results from at:

- Three or more monitoring exercises within two years; or
- Two or more monitoring exercises in one year supported by continuous monitoring.

Any significant process changes, which might have affected the monitored emission, should be taken into account.

The frequency of testing shall be increased, for example, as part of the commissioning of new or substantially changed activities, or where emission levels are near to or approach the emission concentration limits.

B01/02 (d) Compliance with SED requirements

Solvent Management Plan:

The Solvent Management Plan provides definitions and calculations to demonstrate compliance with the VOC requirements. The use of the standard definitions and calculations also ensures consistency of VOC compliance across installations with an industrial sector.

The definitions provided must be used in all calculations relating to the Solvent Management Plan (SMP).

- For SED installations using the emission and fugitive limits, the SMP should be used for determining the fugitive emissions. Once completed, it need not be done until the equipment is modified.
- For process/activities using the reduction scheme, the SMP should be used to determine the actual emissions annually.

Figure 1: Solvent Management Plan.

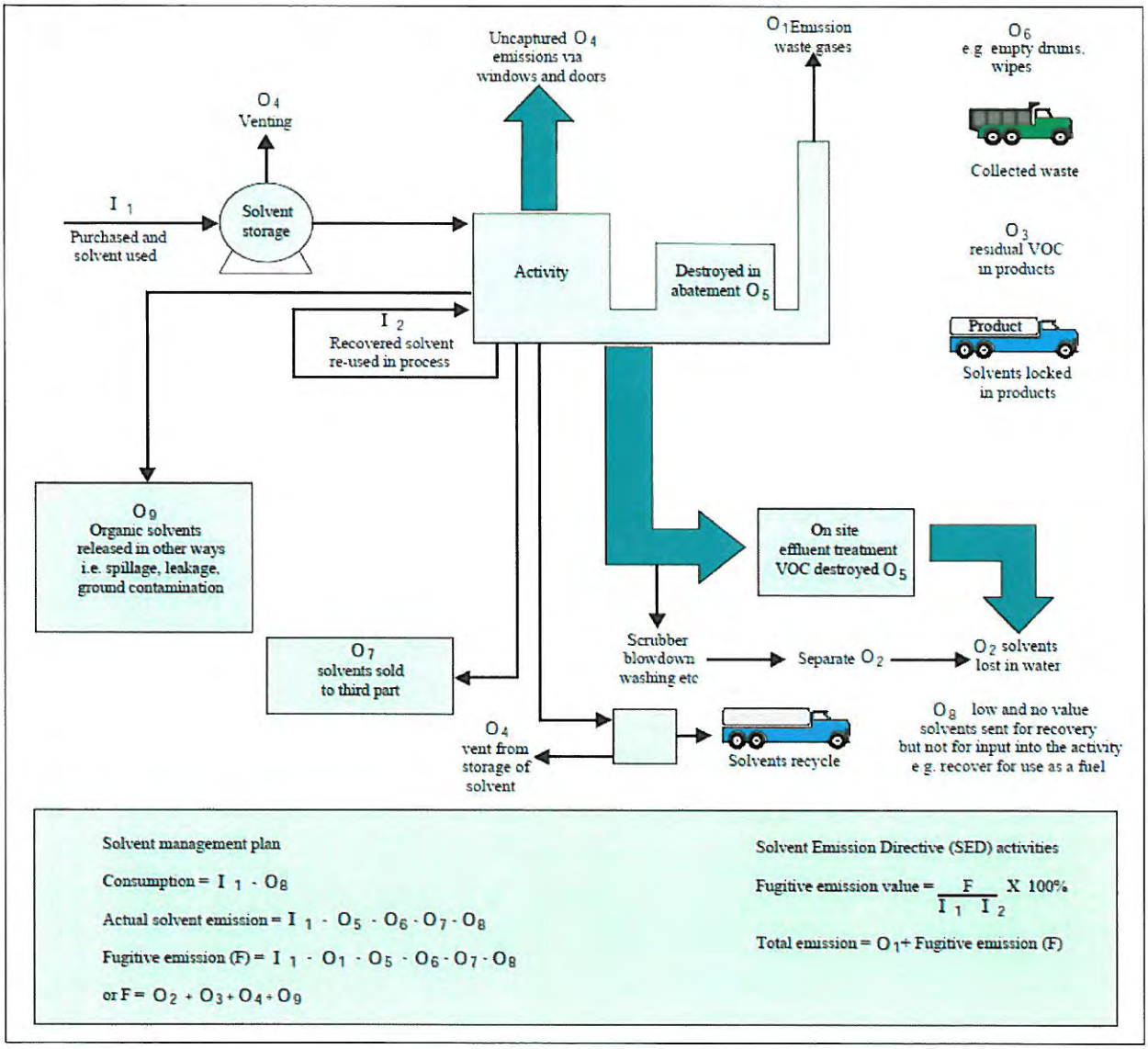


Table 1: Definitions used in Solvent Management Plan.

Code	Description
Inputs of Organic Solvents in the time frame over which the mass balance is being calculated (I)	
I_1	The quantity of organic solvents, or their quantity in preparations purchased which are used as input into the process/activity (including organic solvents used in the cleaning of equipment, but not those used for the cleaning of the products).
I_2	The quantity of organic solvents or their quantity in preparations recovered and reused as solvent input into the process/activity. (The recycled solvent is counted every time it is used to carry out the activity.)
Outputs of Organic Solvents in the time frame over which the mass balance is being calculated.	
O_1	Emissions in waste gases.
O_2	Organic Solvents lost in water, if appropriate taking into account waste water treatment when calculating O_5.
O_3	The quantity of organic solvents which remains as contamination or residue in products from the process/activity.
O_4	Uncaptured emissions of organic solvents to air. This includes the general ventilation of rooms, where air is released to the outside environment via windows, doors, vents and similar openings.
O_5	Organic solvents and/or organic compounds lost due to chemical or physical reactions (including for example those which are destroyed e.g. by thermal oxidation or other waste gas or waste water treatment, or captured, e.g. by adsorption, as long as they are not counted under O_6, O_7 or O_8).
O_6	Organic solvents contained in collected waste.
O_7	Organic solvents, or organic solvents contained in preparations, which are sold or are intended to be sold as a commercially valuable product.
O_8	Organic solvents contained in preparations recovered for reuse but not as input into the process/activity, as long as not counted under O_7.

Determining Fugitive Emissions:

To demonstrate compliance with fugitive emissions (F):

$F = I1 - O_1 - O_5 - O_6 - O_7 - O_8$

Or

$F = O_2 + O_3 + O_4 + O_9$

This quantity can be determined by direct measurement of the quantities. Alternatively, an equivalent calculation can be made by other means, for instance by using the capture efficiency of the process.

The Fugitive Emission value as a percentage of the Solvent Input (I) is determined by:

Fugitive Emission Value = 100xF/I

Where the Solvent Input (I) = I1 + I2 (determined as part of the Solvent Management Plan)

Fugitive emission values must be determined for each installation, and must be repeated when any equipment modification is carried out.

Determination of Solvent Consumption

Construction of inventories of materials consumed and disposed of may involve the identification of individual organic solvents or solids. This may give rise to an issue of commercial confidentiality. Information supplied must be placed on the public register, unless exclusion has been granted on the grounds of commercial confidentiality or national security. (Further guidance can be found in chapter 8 of the General Guidance Manual on policy and procedures for A2 and B installations).

A determination of the organic solvent consumption, the total mass of organic solvent inputs minus any solvents sent for reuse/recovery off-site, should be made and submitted to the regulator annually, preferably to coincide with the operators stocktaking requirements, in the form of a mass balance in order to determine the annual actual consumption of organic solvent (C):

Where $C=I_1-O_8$

I_1 Total quantity of organic solvents or their quantity in preparations purchased which are used as input into the process/activity.

A calculation of the purchased organic solvent Input (I_1) to the process/activity, is carried out by recording:

	(i)	The mass of organic solvent contained in coatings, diluents and cleaners in the initial stock (IS)at the start of the accounting period; plus
	(ii)	The mass of organic solvent contained in coatings, diluents and cleaners the purchased stock (PS) during the accounting period.
	(iii)	Minus the mass of organic solvent contained in coatings, diluents and cleaners in the final stock (FS) at the end of accounting period.

Total Organic Solvent Input (I_1) = IS + PS - FS

Schedule 2

Permit reference B01/02 as varied by this notice ~~and variation notices~~

~~[and~~]

(Insert amended or full consolidated permit).

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/quality/pollution/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(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 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 or 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

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.