

Permit Reference: B19/93

As varied by: EPA19/99, EPA10/03, PPC12/09, PPC06/17, PPC02/18, PPC03/18

ENVIRONMENTAL PERMIT

Pollution Prevention and Control Act 1999 Environmental Permitting (England and Wales) Regulations 2016 as amended

Operator

Henkel UK Operations Limited
5 Cromwell Road
St Neots
Cambridgeshire
PE19 1QL

Registered Office

Henkel UK Operations Limited
Wood Lane End,
Hemel Hempstead,
Herts,
HP2 4RQ

Address of Permitted Activity

As above

Company Registration Number

GB410972468

Regulated Activities:

Coating Manufacturing Process

Regulator contact details

Huntingdonshire District Council
Pathfinder House
St Mary's Street
Huntingdon
PE29 3TN
01480 388 388

Permit Status Log:

Ref	Detail	Date	Comment
B19/93	Permit Issued	11th November 1993	Issued
EPA19/99	Variation	17th September 1999	Description and all conditions
EPA10/03	Variation	30th July 2003	Description and all conditions
PPC12/09	Variation	21st October 2009	All conditions
PPC06/17	Variation	22nd May 2017	Vary conditions & change reporting req.
PPC02/18 & PPC03/18	Transfer & Variation	13th June 2018	From Daxx to Henkel & conditions 1&2

Huntingdonshire District Council (the regulator) hereby permits Henkel UK Operations Limited to operate a coating manufacturing process as defined in Part 2 of Schedule 1 to the Environmental Permitting Regulations Sections 6.5 Part B (a)(i) and 6.7 Part B (a)(i), and as described below in accordance with the following conditions which shall apply forthwith.

Description of Activity

The production of a dispersion of rubber in solvent which is used extensively throughout the food industry as a sealant for containers and various minor products also used primarily in the can making industry. The location of the installation can be seen on the attached drawing B19/93(a) Location plan.

The process can be divided into two sections. The first section takes place in the rubber compounding room, known as the Banbury Building. Rubbers and other materials are used in various formulations according to the required mix. The constituents are mixed mechanically in a single water cooled Banbury mixer in which the rubber mixture reaches a temperature of 100°C. A course rubber mass is produced which is then transferred to a 2 roll mill situated immediately beneath the Banbury mixer where further mixing and compounding takes place. Carbon black is used in the process but is either pre-mixed with the rubber ingredients before delivery to site or is introduced to the Banbury mixer in plastic bags designed to disintegrate under heat to minimise the release of carbon black dust.

The rubber compound is removed from the 2 roll mill in the form of strips which are fed to a chipper to be cut into small strips. From the chipper, the strips are fed along a covered conveyor system which transfers them to the next part of the process in the solvent plant.

When the rubber strips are transferred to the solvent plant they are fed to one of the 3 mixers, with a fourth mixer used solely for acetone-based products. Various solvents are used for the manufacture of liquid fluxes, nozzle dousing fluids and tab lubricants.

The processing is of a batch nature. The charging of rubber chip to the appropriate mixer is carried out over a pre-determined time period during which the mixer cover is open. Agitation is constant throughout this charging phase, helping facilitate the dispersion process.

The mixer is then closed and agitation is continued then the rubber is dispersed/dissolved and the batch is transferred to one of seven bulk tanks.

Semi-finished product in the bulk tanks is cooled by passing through water cooled heat exchangers and homogenised to adjust the viscosity characteristics. Additional solvent is then added to adjust the compound to the required viscosity and total solids content, prior to packing into drums, 1 tonne intermediate bulk containers (IBC) or road tankers.

In addition the packing systems to drums, IBC's and road tankers are vapour balanced, as are the three underground solvent storage tanks for both storage to process and receipt into storage. There are also additional above-ground solvent storage tanks are installed within a bunded area adjacent to the solvent building.

For production of minor products, including the acetone solvent based compound product, there are six mixers installed in the south-west corner of the solvent building. The minor products are characterised by low volatility and low throughput.

Conditions

Emissions Monitoring

	Pollutant	Source	Emission limit	Type of monitoring	Frequency of monitoring
1	Particulate matter	Any source	50mg/Nm ³ as 30-minute mean for contained sources	Manual extractive testing	Annual
2	Particulate matter	Carbon black activities	10mg/Nm ³ as 30-minute mean for contained sources	Manual extractive testing	Annual
3	VOC	Solvent management plan	Total used	Calculation	Annual
4	VOC	Total emission limit value	3% of organic solvent input	Manual extractive and calculation	Annual

5. Compliance with condition 4 is achieved if the total emission from the activity expressed as a percentage of the organic solvent input to the activity is equal to or less than the total emission limit value.

Where total emission is equal to the mass of organic solvent released in the waste gases plus the fugitive releases.

Total emission = Emission in waste gases + fugitive emissions.

And organic solvent is equal to the quantity of organic solvents purchased and used in the process plus the quantity of organic solvents recovered and reused as organic solvent input into the process as determined as part of the solvent management plan.

Compliance with the total emission limit value is achieved if:

$$\frac{\text{Total emission}}{\text{Organic solvent input}} \times 100 \text{ is equal or less than the total emission limit value.}$$

6. All continuous monitoring readings shall be on display to appropriately trained operating staff.

7. All emissions monitoring shall be carried out in an approved manner.

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

Designated Materials

9. Substances with the following hazard statement (designated risk phrase) H340 (R45), H341 (R40), H350 (R46), H350i (R49), H351 (R68), H360D (R60) & H360F (R61) shall not be used as part of the process.

Record keeping

10. The operator shall keep records of inspections, tests and monitoring, including all non-continuous monitoring, inspections and visual assessments. In such cases:

- (a) Current records shall be kept on site and made available for the regulator so examine.
- (b) Records shall be kept by the operator for at least two years.

Adverse results/abnormal emissions

11. Adverse results from any monitoring activity shall be investigated by the operator as soon as the 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.

12. 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.

13. In the case of abnormal emissions, malfunction or breakdown leading to Immediate danger to human health the activity shall be suspended. The following criteria shall be taken into account.

- (a) The toxicity of the substance being released.
- (b) The amount released.
- (c) The location of the installation.
- (d) The sensitivity of the receptors.

Submissions to the regulator

14. 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 plant.

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

16. A summary of the results of the first non-continuous testing shall be forwarded to the regulator within 8 weeks of the completion of the sampling. The summary shall include details of any breaches of emission limits. A full report following completion of the second non-continuous monitoring testing shall be forwarded to the regulator within 8 weeks.
17. A summary of the continuous monitoring shall be provided to the regulator at least once a year. The summary shall include details of any breaches of any emission limits.

Odour & dust

18. There shall be no sustained offensive odour beyond the site boundary, as perceived by the regulator.
19. Where in the opinion of the regulator, there is evidence of sustained offensive odour from the process off site; the operator shall make their own inspection and assessment and an odour management plan shall be developed and actioned.
20. All potentially odorous materials, including wastes shall be stored and transferred by suitable methods in order to minimise emissions.
21. 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.
22. All dusty or potentially dusty materials, including wastes, shall be stored in silos, in confined storage areas, or in fully enclosed containers/packaging. Suitable precautions shall be taken to prevent wind whipping.

Maintenance & Plant

23. The operator shall produce a list of key equipment and shall develop procedures for its use, including failures and a written maintenance plan. These procedures shall be made available to regulator on request.
24. A record of such maintenance shall be made available for inspection by the regulator.
25. 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.
26. 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.

27. All continuous monitors shall be operated, maintained and calibrated in accordance with the manufacturers' instructions. The relevant maintenance and calibration shall be recorded, and such records made available for inspection by the regulator.

Training

28. Training of all staff with responsibilities for operating the process 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.
29. 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 on request.

Deliveries

30. When delivery to a silo or bulk storage tank takes place, displaced air shall either be vented to suitable arrestment plant or back vented to the delivery tanker. All arrestment plant shall be of sufficient size to avoid pressurisation during delivery.
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.

Best Available Techniques

32. 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.

Operational Changes

33. 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:



Date:

13 June 2018

Head of Community

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 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.

6 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.

7 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.

8 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.

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