

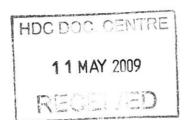
Our ref:

LR/ajb/PH/DPH/Determinants/Pollution/LIPPC EAGalvanizing 7Ma mbridgeshire

Your ref:

Date:

7 May 2009



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Mr Dave Bass

Environmental Protection Officer

Environmental Health Services Division

Huntingdonshire District Council

Pathfinder House St Mary's Street

Huntingdon Cambs

PE29 3TN

onmenta/

Dear Mr Bass

ENVIRONMENTAL PERMIT APPLICATION FOR EAST ANGLIAN GALVANIZING LTD AT OLD NORTH ROAD, SAWTRY, PE28 5XN

Thank you for forwarding a copy of this application to NHS Cambridgeshire on 8 April 2009.

There are a number of slight concerns associated with this application. The main concern is regarding the potential risks regarding accidental releases of chemicals to the surface water drainage system. These may have been inadequately accounted for in the operation and control procedures detailed.

The details of the processes are only basically described in the application. The chemical composition of the alkali degreasing agent and the flux solution are not fully reported, however the emissions from their tanks are basically described. The passivation process is insufficiently described to allow for any human health risk assessment to be performed.

<u>Point emissions</u>: Fumes are expected to be generated during the process of dipping the treated metal into the molten Zinc. These are expected to contain Ammonium Chloride and are to be controlled using an extraction system over the process tank leading to a 3m stack. The applicant states that tests over several years at similar plants within their business have demonstrated that emissions from the process are within the final emission limit of 15 mg/m³ and are achieved without the need for abatement equipment. No dispersal modelling has been undertaken and the rates of emissions are unspecified. This emission is to be tested isokinetically on an annual basis.

Recommendations:

The PCT requests that the regulator considers if the plan for the drainage system to discharge to a surface water drain the best available technique for disposal of water that could be easily contaminated.

The PCT requests that the regulator considers if they agree with the applicant that testing of the stack and surface water emissions only requires testing for contamination an annual basis.

Any information arising from these recommendations should be sent to the Primary Care Trust for consideration when it becomes available. Such information could affect the comments made in this response.

The response outlined in this representation is based on the following general assumptions:

- the permit holder shall be using 'best available techniques' in accordance with Article 2(11) of the IPPC Directive;
- information about any breach of permit condition(s) which could result in adverse health effects to the local population is reported to the Primary Care Trust.

Yours sincerely

Dr Liz Robin

Director of Public Health NHS Cambridgeshire

CC:

Dr Lincoln Sargeant, Consultant in Public Health Medicine, NHS Cambridgeshire Dr Kate King, Health Protection Agency, Kingfisher House, Huntingdon Mr Chris Banks, Chief Executive, NHS Cambridgeshire