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

EP Permit ref: B11/06 Variation ref: PPC 02/12

Variation Notice

From: Huntingdonshire District Council ("the Council")

To: [1]

Anglo Interiors Limited
Unit 3 Bellbrook Enterprise Centre
Bell Lane
Uckfield
East Sussex TN22 1QL

Huntingdonshire District Council ("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 B11/06 granted under regulation 13(1) of the 2010 Regulations in respect of the operation of the installation~~/mobile plant~~ at

Anglo Interiors Ltd
20 Little End Road
Eaton Socon
St Neots
PE19 8JH

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 26 April 2012 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 2010/675, as amended
(3) 1995 c.25.

Delete words in square brackets which do not apply.

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EP Permit ref: B11/06

Variation ref: PPC 02/12

Schedule 1

Variation to the conditions of the permit	Date(s) on which the variation is to take place
Transfer permit to new operator	26 April 2012
Vary all permit conditions	26 April 2012

Signed on behalf of Huntingdonshire District Council

Dated 26 April 2012

Signed

Designation Head of Environmental and Community Health Services

An authorised officer of the Council

Schedule 2

Permit reference B11/06 as varied by this notice ~~and variation notices~~

~~[and~~]

(Insert amended or full consolidated permit).

Huntingdonshire
DISTRICT COUNCIL

PERMIT

Pollution Prevention and Control Act 1999

Environmental Permitting (England and Wales) Regulations 2010

Permit Reference: B11/06

Huntingdonshire District Council (the regulator) hereby permits Anglo Interiors Limited Unit 3 Bellbrook Enterprise Centre Bell Lane Uckfield East Sussex TN22 1QL to operate a timber and wood coating process as defined in Part 2 of Schedule 1 to the EP Regulations Section 6.6 Part B(a) and Section 6.4 Part B(a), respectively, and as described below in accordance with the following conditions which shall apply forthwith.

Address of permitted activity: Anglo Interiors Ltd
20 Little End Road
Eaton Socon
St Neots
PE19 8JH

Location plan can be seen on B11/06 (a) Location plan

Description of Activity

The above company manufacture bespoke joinery display items primarily for the retail sector. The majority of items are manufactured from wood based products which are coated to the desired specifications.

Timber is delivered to the site and are cut, shaped, bored to size on specialist equipment. All timber equipment is connected to a purpose designed dust extraction system which extracts dust and chippings directly to a skip which is removed by a licensed contractor.

The coating activities are undertaken in two dedicated spraybooths. Both spraybooths have filters fitted to the exhausts which are changed on a regular basis. The exhausts terminate above the rood ridge to aid dispersion. Paints are stored in a dedicated storage compound and paints are not mixed on site. Waste paint is collected by a licensed contractor. Coated products are dried in the booth with the extractor fan running.

Other activities on site which do not require permitting is powder coating which is under the required levels for permitting and metal working.

Conditions

Emissions, testing and record keeping:

	Pollutant	Source	Emission limit	Type of monitoring	Frequency of monitoring
1.	Particulate matter	Whole site	No visible emissions	Visual observations	At least 3 times a day
2.	Particulate matter	Arrestment plant	No visible emissions	Visual observations	On start up and on at least two more occasions during the working day.
3.	Particulate matter	Spraybooths	50mg/Nm^3 as minute mean for contained sources (1).	Manual extractive testing	Annual (2)
4.	Isocyanates	Spraybooths (only when coating activities uses isocyanates)	0.1mgNm^3 as a 15 minute mean for contained sources excluding particulate and expressed as NCO (1).	Manual extractive testing	Annual (2)
5.	VOC	Whole Site	Total VOC Consumption	Total VOC Consumption Calculation (3)	Annual
6.	VOC	Whole site	Target emission figure of total mass of solids x 1.6	Solvent reduction scheme calculation (4)	Annual

(1) The reference conditions are: 273.1K, 101.3kPa, without correction for water vapour content.
(2) Monitoring frequency can be varied if it meets the parameters set out in B11/06(b) Varying Monitoring Frequency.
(3) As described in B11/06(c) Solvent Consumption
(4) As described in B11/06(d) Solvent Reduction Scheme.

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

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

9. The operator shall keep records of inspections, tests, monitoring, including all non-continuous monitoring, inspections and visual assessments and maintenance. The records shall be:
   (a) Kept on site.
   (b) Kept by the operator for at least two years.
   (c) Made available for the regulator to examine.

10. The operator shall produce a list of key arrestment plant and shall have written procedures for its use and failure. These procedures shall be provided to the regulator upon request.

11. Adverse results from any monitoring activity shall be investigated by the operator as soon as the monitoring data has been obtained or 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. Where in the opinion of the regulator, there is evidence of airborne dust/particulate matter or odour from the process off the site, the operator shall make their own inspection and assessment, and where necessary undertake ambient monitoring with the aim of indentifying those process operations giving rise to the dust/particulate matter or odour.

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

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 arrestment plant.

Timber:

15. Wood dust shall be stored in enclosed containers.

16. The transportation and handling of wood dust and wood particles shall be carried out using pneumatic or enclosed handling systems.

17. All wood dust storage and transportation systems shall be visually inspected regularly to indentify damaged or worn ductwork and any build up of wood dust or particles shall be removed and the source of fugitive emissions repaired.

18. Wood waste shall be removed from site in totally enclosed containers. Where vehicles are filled directly from the arrestment plant, the extraction system shall be turned off or a discharge pipe shall be fitted with a two-way valve so that vehicles can be changed over with emissions occurring.

19. All spillages shall be cleared as soon as possible using methods to prevent wood dust from escaping off site.

Coating:

20. The operator shall ensure that relevant stacks or ducts are fitted with facilities for sampling which allow compliance with the sampling standards.

21. No coatings with the materials designation, because of the VOC content, H340, H341, H350, H350i, H351, H360D or H360F shall be used.

22. Coatings containing VOC shall be stored in closed storage containers.

23. Spray coatings shall be applied using one of the following methods:
    (a) Air-assisted airless.
    (b) Centrifugal.
    (c) High Volume Low-Pressure (HVLP).
    (d) Hot airless.
    (e) Electrostatic systems.
    (f) A system capable of achieving a transfer efficiency of at least 65%.

24. Application of cleaning solvents shall be:
    (a) From a contained device or automatic systems.
    (b) Dispensed by piston type dispenser or similar contained device when used on wipes.

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

26. Cleaning operations involving organic solvents shall be reviewed at least once every two years to identify opportunities for reducing VOC emissions. The regulator shall be provided with a report of the conclusions upon request.

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

28. Nominally empty drums or drums containing waste contaminated with VOC awaiting disposal shall be stored in accordance with the requirements for full or new containers.

Maintenance:

29. A written preventative maintenance programme shall be written with respect to pollution control equipment. A copy of the programme shall be provided to the regulator upon request.

30. A record of such maintenance shall be made available for inspection by the regulator.

31. Spares and consumables – in particular, those subject to continual wear – shall be held on site, or shall be available at short notice from guaranteed local suppliers, so that plant breakdowns can be rectified rapidly.

Training:

32. Training of all staff with responsibility for operating the process shall include:
    (a) Awareness of their responsibilities under the permit; in particular, notifications to the regulator and daily checks.
    (b) Minimising emissions on start up and shut down.
    (c) Action to minimise emissions during abnormal conditions.

33. The operator shall maintain a statement of training requirements for each operational post and keep records 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.

General:

34. 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.

35. 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: 26 April 2012

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.

B11/06(a) Location plan

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B11/06 (b) Varying Monitoring Frequency

Where non-continuous quantitative monitoring is required, the frequency may be varied. W here there is consistent compliance with emission limits, regulators may consider reducing the frequency. However, any significant process changes that might have affected the monitored emission should be taken into account in making the decision.

The following should be considered when deciding whether compliance is consistent:

(a) The variability of monitoring results, for example, results which range from 15 – 45 mg/m^3, against a emission limit of 50 mg/m^3might not qualify for a reduction in monitoring.
(b) The margin between the results and the emission limit for example, results which range from 45 – 50 mg/m^3 when the limit is 50 mg/m^3 might not qualify for a reduction in monitoring.

Consistent compliance should be demonstrated using the results from at least;

(a) Three or more monitoring exercises within two years or;
(b) Two or more monitoring exercises in one year supported by continuous monitoring.

Where a new or substantially changed process is being commissioned, or where emission levels are near to or approach the emission concentration limits, regulators should consider increasing the frequency of testing.

Where continuous quantitative or indicative monitoring is required it is not appropriate that reduced monitoring be applied as the monitoring is required to demonstrate either compliance with emission limits on an ongoing basis or to demonstrate correct functioning of arrestment equipment.

B11/06 (c) 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.

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. This should be in the form of a mass balance in order to determine the annual consumption of organic solvent (C):
Where: $\mathbf{C = I_1 - O_8}$ (See definitions below)

Definitions:
Inputs of Organic Solvent in the time frame over which the mass balance is being calculated (**I**).

$\mathbf{I_1}$ The quantity of organic solvents or their quantity in mixtures purchased which are used as input into the process/activity (including organic solvents used in the cleaning of equipment but not those used for cleaning the products).

$\mathbf{I_2}$ The quantity of organic solvents or their quantity in mixtures 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**).

$\mathbf{O_1}$ Emissions in waste gases.

$\mathbf{O_2}$ Organic solvents lost in water, if appropriate taking into account waste water treatment when calculating O5.

$\mathbf{O_3}$ The quantity of organic solvents which remains as contamination or residue in products output from the process/activity.

$\mathbf{O_4}$ Uncaptured emissions of organic solvents to air. This includes the general ventilation or rooms, where air is released to the outside environment via windows, doors, vents and similar openings.

$\mathbf{O_5}$ 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 treatments, captured, e.g. by adsorption, as long as they are not counted under $\mathbf{O_6}$, $\mathbf{O_7}$ or $\mathbf{O_8}$).

$\mathbf{O_6}$ Organic solvents contained in collected waste.

$\mathbf{O_7}$ Organic solvents, or organic solvent contained in mixtures, which are sold or are intended to be sold as a commercially valuable product.

$\mathbf{O_8}$ Organic solvents contained in mixtures recovered for reuse but not as input into the process/activity, as long as not counted under $\mathbf{O_7}$

$\mathbf{O_9}$ Organic solvents released in other ways.

B11/06 (d) Solvent Reduction Scheme

The reduction scheme is a method of preventing and minimising emissions of VOC, using non-abatement techniques such as:

- Water borne coatings (low organic solvent content)
- Higher solids content coatings
- Powder coatings
- Organic solvent free liquid coatings
- Radiation cured coatings (for example, ultra violet and electron beam).

The reduction scheme means an installation achieves emission reductions to a "Target Emission" equivalent to those which would have been achieved if the concentration emission limits had been applied.

The following scheme should operate for installations for which a constant solid content of product can be assumed and used to define the reference point for emission reductions.

The operator should forward an emission reduction plan, which includes in particular:

- Mechanisms to decrease in the average solvent content of the total input; and/or
- Systems to increase efficiency in the use of solids to achieve a reduction of the total emissions from the installation.

The Target Emission from an installation should be calculated by multiplying the total mass of solids in the quantity of coatings used in a year with the relevant figure given in Table 1 below. In determining the total mass of solids:

- Solids are all materials in coatings that become solid as a result of curing, polymerisation, or the evaporation of the water or solvent (usually available from the supplier in g/l or non-volatile % mass by weight) and
- All ingredients other than water and organic solvents should be assumed to form part of the solid coating.
- In cases of doubt, the reference standard for the determination of non-volatile % mass by weight is BS EN ISO 3251 (also numbered BS 3900:B18). The test conditions may need to be adjusted for the particular conditions of use or when assessing chemically or radiation cured coatings, where otherwise volatile components react to form part of the dry solid coating.

Table 1: Reduction scheme: Target Emission Figures.

Coating activity	Wood Coating 5-15 tonnes	Total mass of solids x 1.6
	Wood Coating Over 15 tonnes	Total mass of solids x 1.0

Compliance with the Reduction Scheme is achieved if the annual actual solvent emission determined from the Solvent Management Plan is less than or equal to the Target Emission.

Where the annual solvent emission is:
Annual actual solvent emission = $I_1 - O_8 - O_7 - O_6$ (- O_5 if abatement has been used) (See Definitions below)

The flexibility inherent in this compliance route should be taken to encourage:

- The replacement of a low or no organic solvent coating system with a conventional high organic solvent coating system.

- The introduction of such a conventional high organic solvent coating system into a process/activity.
- The introduction of such a conventional high organic solvent system onto a product where it was not in use before.
- The introduction of high solids formulations which have no beneficial effect on the product but increase the solids used, where a reduction in overall VOC emissions can be demonstrated.

Regulators should seek prior notification of any proposal to introduce such systems, which should include reasons why lower organic solvent systems are not considered technically appropriate or practicable.

Definitions:

Inputs of Organic Solvent in the time frame over which the mass balance is being calculated (**I**).

I_1 The quantity of organic solvents or their quantity in mixtures purchased which are used as input into the process/activity (including organic solvents used in the cleaning of equipment but not those used for cleaning the products).

I_2 The quantity of organic solvents or their quantity in mixtures 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**).

O_1 Emissions in waste gases.

O_2 Organic solvents lost in water, if appropriate taking into account waste water treatment when calculating O5.

O_3 The quantity of organic solvents which remains as contamination or residue in products output from the process/activity.

O_4 Uncaptured emissions of organic solvents to air. This includes the general ventilation or 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 treatments, 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 solvent contained in mixtures, which are sold or are intended to be sold as a commercially valuable product.

O_8 Organic solvents contained in mixtures recovered for reuse but not as input into the process/activity, as long as not counted under O_7

O_9 Organic solvents released in other ways.

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, available at http://www.defra.gov.uk/environment/quality/industrial/las-regulations/guidance/.

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 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.