

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

Our Ref: ECS/DJB/PPC/30496

9 July 2008

Dear Mr G Ford

**The Pollution Prevention and Control Act 1999
The Environmental Permitting (England and Wales) Regulations 2007**

Reference: B01/02
Operator: Paxford Composites Ltd
Installation: 2-4 Redwongs Way, Huntingdon, PE29 7HB

Thank you for meeting with me and discussing the way forward to ensuring the above installation is fully compliant with its permit. The following points were discussed which require action taken.

Please confirm, in writing, that your company name is Paxford Composites Ltd.

Conditions 4 & 18

These two conditions make it a requirement to calculate your annual use of organic solvents and undertake yearly emission monitoring from your three spray booths to ensure that you are achieving the emission limits set out in the permit. The emission limit for organic solvents is dependant on the amount of organic solvents used. I am aware that you are currently keeping records on your organic solvent usage but an emission monitoring test has not been undertaken since 2006. Therefore, please organise an emissions test as soon as possible.

Condition 28 & 30

These two conditions make it a requirement to undertaken maintenance of equipment which contributes to your emissions to air, for example the spray-booths. Currently the spray booths are serviced twice a year by an external company and spray-booth filters are changed by yourselves after a certain number of hours used. Please ensure that records are kept for all maintenance, including filter changes.

Condition 34

The above condition makes it a requirement for staff whose roles may affect your emissions to air to receive training. Please ensure that all staff are trained to the degree required for their duties.

Procedures

It is apparent that the main reason for the current non compliance of your permit conditions is due to the lack of clarity of roles, responsibilities and actions in relation to the permissible activities. To avoid this problem you should develop a series of procedures which can be used by both managers and employees to ensure their work is being undertaken appropriately. Procedures should be developed on the following themes operation, maintenance, monitoring and training.

Operation: There should be an overview of how your product(s) is made i.e. from material entering the facility to an end product leaving the facility, including waste generation and training requirements. Each separate piece of equipment should have a procedure clearly stating how it should be used which should be readily available for employees. Whilst this section is primarily concerned over environmental releases it would be considered good practice to include information on health and safety and quality assurance within these procedures, alternatively if you have any procedures already written but doesn't currently include environmental releases then it is acceptable to modify them to include environmental issues as well.

Maintenance: All machines should be maintained to ensure that they working correctly and safely. The procedures should include the type, frequency and who does the maintenance. If the maintenance is undertaken by an external body then also include whose responsibility it is to organise this. It is also necessary to keep information on when the maintenance has been carried out and any problems highlighted or certificates issued.

Monitoring: It is necessary to have a procedure of what monitoring is required, its frequency and who is responsible either to undertake the monitoring, contact any external bodies and pass the results to the regulator. It is also necessary to keep records of all monitoring results.

Training: As certain machines or operations require specific qualifications to be operated it is a requirement to keep training records of any relevant staff.

As you are aware your site is currently classed as a high risk site, consequently you are required to have a minimum of three inspections a year by this department. I intend on inspecting your premise again in November or December 2008. I expect you to have made considerable improvements by the time I undertake my inspection and have a timetable prepared for the completion of any outstanding issues.

If you have any questions please contact myself on the numbers below.

Yours sincerely

Dave Bass
Environmental Protection Officer
Environmental Health Services Division
Huntingdon District Council

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If you would like a translation of this letter, or would like a large text version or an audio version, please contact the Environmental Health Admin Team on 01480 388302 and we will try to accommodate your needs.