6.4/06919JT



## POLLUTION PREVENTION AND CONTROL ACT 1999 ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS as amended 2010

# Permit Number: 6.4/06919/JT

Installation Address: HTC Plant Limited Grange Mill Lane Sheffield S9 1HW

In accordance with Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010 as amended, HTC Plant Limited is hereby permitted to operate a scheduled activity at the address detailed above, namely a Coating Activity as described in Schedule 1, Part 2, Chapter 6, Section 6.4, Part B, subsection (a)(iv) and Section 7, Part B subsection (a) and subject to the following conditions.

Signed

November 22nd 2012

Assistant Manager Authorised by Sheffield City Council to sign on their behalf

The Secretary of State's Guidance note PG 6/23 (11) for Coating of Metal and Plastic Processes has provided the framework for the conditions in this permit.

#### Name & Address of Operator:

HTC Plant Limited Grange Mill Lane Sheffield S9 1HW

#### **Contacts:**

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Company registration number: 04441421

## **Registered Office:**

HTC Plant Limited 171-173 Grays Inn Road London WC1X 8UE

## Address of Permitted Installation:

HTC Plant Limited Grange Mill Lane Sheffield S9 1HW

## Holding Company:

PC Harrington Holdings Limited 171-173 Grays Inn Road London WC1X 8UE

## **Principal Office Address:**

19 Whitley Gardens Southall Middlesex UB2 4ES

## Talking to Us

Any communication with Sheffield City Council should be made to the following address quoting the Permit Number:

ENVIRONMENTAL PROTECTION SERVICE SHEFFIELD CITY COUNCIL 2-10 CARBROOK HALL ROAD CARBROOK SHEFFIELD S9 2DB

Telephone: (0114) 273 4651

Alternatively Email: <a href="mailto:epsadmin@sheffield.gov.uk">epsadmin@sheffield.gov.uk</a> or <a href="mailto:ippc@sheffield.gov.uk">ippc@sheffield.gov.uk</a>

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#### Explanatory Note to Pollution Prevention and Control Permit for Part B Installations. (This note does not form a part of the Permit)

The following Permit is issued under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010 (S.I. 2010 No.675), as amended, ("the EP Regulations") to operate an installation carrying out activities covered by the description in Part 2, Chapter 6, Section 6.4, Part B (a) (iv) Coating Activities and Section 7, Part B (a) SED Activities of Schedule 1 of those Regulations, to the extent authorised by the Permit.

## **Process Changes**

Under the provisions of the EP Regulations, you are required to notify the Council of any proposed change in operation at least 14 days before making the change. This must be in writing and must contain a full description of the proposed change in operation and the likely consequences. Failure to do so is an offence.

If you consider that a proposed change could result in the breach of the existing permit conditions or is likely to require the variation of permit conditions then you may apply in writing under Regulation 20(1) of the EP Regulations. Additionally, if this involves a SUBSTANTIAL CHANGE to the installation you will be required to submit an application, pay the relevant fee and advertise the application accordingly. You may serve a Notice on the Council requesting that they determine whether any change that is proposed would constitute a substantial change before you proceed with application.

#### Variations to the Permit

The Permit may be varied in the future by the Council serving a Variation Notice on the Operator. If the Operator wishes any of the Conditions of the Permit to be changed, a formal Application must be submitted.

## Surrender of the Permit

Where the operator of a Part B installation or mobile plant ceases or intends to cease the operation of the activity the operator may notify the regulator of the surrender of the whole permit, in any other case, notify the regulator of the surrender of the permit in so far as it authorises the operation of the installation or mobile plant which he/she has ceased or intends to cease operating. The notification shall contain information as described in Regulation 24 or 25 of the EP Regulations.

## Transfer of the Permit or Part of the Permit

Before the Permit can be wholly or partially transferred to another person, a joint application to transfer the Permit has to be made by both the existing and proposed holders, in accordance with Regulation 21 of the EP Regulations. A transfer will be allowed unless Sheffield City Council considers that the proposed holder will not be the person who will have control over the operation of the installation or will not ensure compliance with the conditions of the transferred Permit.

## Annual Subsistence Fee

In accordance with Regulation 65 of the EP Regulations, the holder of a permit is required to pay a fee for the subsistence of the Permit. This fee is payable annually on 1<sup>st</sup> April. You are advised that under the provisions of Regulation 65 (5) of the EP Regulations, if you fail to pay the fee due promptly, Sheffield City Council may revoke the Permit. You will be contacted separately each year in respect to this payment.

## Public Register

The Council is required by Regulation 46 of the EP Regulations to maintain a Public Register containing information on all LAPPC installations and mobile plant. The register is available for inspection by the public free of charge during office hours (Monday to Friday 9.00 am to 5.00 pm) at the following address:

Environmental Protection Service Sheffield City Council 2-10 Carbrook Hall Road Carbrook Sheffield S9 2DB

Tel: 0114 273 4651 or email <u>epsadmin@sheffield.gov.uk</u> or ippc@sheffield.gov.uk

#### Confidentiality

Sheffield City Council has a duty to consider the question of confidentiality of information supplied to it. If any information supplied is considered confidential, a statement of which information this applies to and the reasons why it is considered confidential should be specified. The Operator is reminded that he may apply to Sheffield City Council for the exclusion of information from the public register under the provisions of the Environmental Permitting (England and Wales) Regulations 2010 as amended.

#### Appeals

Under Regulation 31 of the EP Regulations operators have the right of appeal against the conditions attached to their permit. Schedule 6 of the EP Regulations sets out the detailed procedures.

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.

Notice of appeal against the conditions attached to the permit must be given within six months of the date of the Notice, which is the subject matter of the appeal.

#### 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:

- Written notice of the appeal;
- A statement of the grounds of appeal;
- A statement indicating whether the appellant wishes the appeal to be dealt with by written representations procedure or a hearing – a hearing must be held if either the appellant or enforcing authority requests this, or if the Planning Inspector or the Secretary of State decides to hold one.
- (Appellants must copy the above three items to the local authority when the appeal is made)
- A copy of any relevant application;
- A copy of any relevant permit;
- A copy of any relevant correspondence between the appellant and the regulator; and
- A copy of any decision or notice, which is the subject matter of the appeal.

#### Where to Send Your Appeal Documents

Appeals should be addressed to:

The Planning Inspectorate Environmental Appeals Administration Room 4/19 – Eagle Wing Temple Quay House 2 The Square Temple Quay Bristol BS1 6PN

In the course of an Appeal process the main parties will be informed of procedural steps by the Planning Inspectorate.

To withdraw an appeal the appellant must notify the Planning Inspectorate in writing and copy the notification to the local authority.

## **Description of Activities**

HTC Plant Limited cleans and re-paints sections of cranes prior to rental. Total solvent consumption is currently in excess of 5 tonnes in any twelve month period. When required, crane sections are cleaned by shotblasting prior to re-painting.

This Permit covers the following activities carried out at the installation;

#### Shotblasting.

The cleaning by shotblasting of metallic crane sections in one purpose built shotblast room. Shot is directed onto the substrate via a nozzle which is held by the operative. Used shot and dislodged materials such as rust are collected by an under floor conveyor where it is separated. Good shot is recycled for re-use, spent unusable shot and large particulates drop into a collection bin. Fine dust created by this process is filtered through a bag filter unit before being discharged to the external air via a square grille opening.

#### Application of Coatings in a Spraybooth.

Coatings containing volatile organic compounds (VOC's) are applied to metal cranes inside a dedicated purpose built "spray and bake" spraybooth, using GRACO 30:1 President Air Assisted Spray Unit with GRACO G40 Air Assisted Spray Guns.

During spraying activities, the residual dust and fume is extracted via an under floor pit to the external extraction system, additional air is fed by a ground level fan via ducting in the roof of the booth. During the bake cycle, typically 30-60 minutes at 30°C, dampers automatically re-direct the majority of the air to re-circulate through the booth, with 10% air bleed to atmosphere.

Emissions of particulates and VOC's from spraying and baking activities are passed through filters prior to being exhausted directly to atmosphere via 2 x 9 metre high stacks.

Typically, one coat of paint is required. The paint currently used is Ultrimax, supplied by Finishline which has a solids content of 55%.

Coatings may also be applied using electrostatic coating methods. This takes place in the spraybooth using specialist guns and a coating agent. Emissions of particulates and VOC's from spraying and baking activities are passed through the spraybooth filters prior to being exhausted directly to atmosphere via 2 x 9 metre high stacks. Following coating application the crane components are baked.

#### Paint Storage.

Paints are stored in a locked storage area and records are kept of the quantities used.

## Paint Decanting Station.

Thinners are added to the paint being used in this room, if required. Residual fumes are exhausted via the stack which discharges vertically.

#### Gun Cleaning.

Spray gun cleaning is undertaken within the spraybooth when a change in paint colour is required. The waste paint and gun cleaner is pumped through the system and sprayed into a drum. The contents of the drum are then transferred to a 45 gallon disposal drum and placed in the disposal area.

This permit also applies to the receipt of raw materials, the handling, storage and transport on site of waste materials within the installation boundary as highlighted in Schedule 2 of this Permit.

## **Conditions of Permit.**

#### Section 1. Upgrading

1.1 Works to increase the height(s) of the spraybooth stacks HTC 2A and HTC 2B by 2m, in accordance with the results in the D1 Calculation Report submitted by Middlewood Environmental Limited, shall be undertaken and completed within 12 weeks of the date of this Permit.

#### Section 2. Plant and Equipment

- 2.1 Permitted activities shall only be carried on using the plant and equipment as detailed in the Description of Activities on pages 8 and 9 of this Permit.
- 2.2 Permitted activities shall only be carried out within the installation boundary as detailed in purple in Schedule 2 of this Permit.
- 2.3 The Permit holder shall inform Sheffield City Council's Environmental Protection Service of any proposed changes to the installation which may have an impact on the emissions to atmosphere. This includes, but is not restricted to, changes to plant or equipment or changes to substances used. The information shall be submitted in writing at least 14 days before the changes take place.
- 2.4 No plant or equipment used for any activity shall be operated with an extraction point direct to atmosphere unless specifically noted within this Permit or specifically agreed in writing with Sheffield City Council's Environmental Protection Service.

#### Section 3. Emission Limits and Controls.

- 3.1 All emissions to the external air, other than steam or condensed water vapour, shall be free from droplets and free from persistent mist and persistent fume.
- 3.2 All emissions shall be free from offensive odour beyond the installation boundary, as perceived by an officer of Sheffield City Council's Environmental Protection Service.
- 3.3 There shall be no persistent visible emission from any activity within the installation boundary.
- 3.4 During start up and shut down, emissions from combustion processes shall not exceed the equivalent of Ringelmann Shade 1, as described in BS 2742:2009. Emissions shall be free from smoke during normal operation.

- 3.5 The Permit holder or operator shall ensure that no coatings containing isocyanates are used in the installation.
- 3.6 The Permit holder or operator shall ensure that no coatings containing lead chromate are used in the installation.
- 3.7 The Permit holder or operator shall ensure that no Designated "Risk Phrase" or "Hazard Statement"<sup>1</sup> coatings are used in the installation.
- 3.8 The use of odour masking agents is not permitted. Where offensive odour is detected at the installation boundary, counteractants may be used only by agreement in writing by Sheffield City Council's Environmental Protection Service.
- 3.9 There shall be no burning of materials in the open air in connection with the installation.
- 3.10 Paint application shall only be carried on inside the dedicated spraybooth with the booth doors closed and the extraction running.
- 3.11 Where the solvent consumption of the coating of metal activity is 5 to 15 tonnes per annum, the following fugitive emission value shall apply:

Activity	Fugitive Emission Limit	Calculation
Coating Activity	25% of the solvent input	Calculation to be undertaken in accordance with PG6/23 (11).

<sup>&</sup>lt;sup>1</sup> Materials designated, because of their VOC content: Until 1 Jun 2015: risk phrase R45, R46, R49, R60 or R61. From 1 Dec 2010: hazard statement H340, H350, H350i, H360D or H360F. Materials designated because of their halogenated VOC content: Until 1 Jun 2015: risk phrase R40, or from 1 Dec 2010 until 1 Jun 2015, risk phrase R68. From 1 Dec 2010: hazard statements H341 or H351. As from 1<sup>st</sup> Dec 2010 "risk phrase" materials will also be known as "hazard statement" materials. Either term will apply until 1 Jun 2015, when only the term "hazard statement" materials will apply.

3.12 Where the solvent consumption of the coating of metal activity is 5 to 15 tonnes per annum, the following emission concentration limits shall apply from contained sources:

Substance	Emission limits	Type of monitoring	Monitoring frequency	Stack Numbers
VOC expressed as total mass of organic carbon	100mg/Nm <sup>3</sup>	Manual extractive testing	Annually*	HTC 2A HTC 2B (spraybooth)
Particulate Matter	50mg/Nm <sup>3</sup>	Manual extractive testing	Annually*	HTC 2A HTC 2B (spraybooth)

\*one stack to be tested annually, both stacks to be tested at least once every two years.

3.13 Where the solvent consumption of the coating of metal activity is 15 tonnes or more per annum, the following fugitive emission value shall apply:

Activity	Fugitive Emission Limit	Calculation
Coating Activity	20% of the solvent input	Calculation to be undertaken in accordance with PG6/23 (11).

3.14 Where the solvent consumption of the coating of metal activity is 15 tonnes or more per annum, the following emission concentration limits shall apply from contained sources:

Substance	Emission Limits	Type of Monitoring	Monitoring frequency	Stack Numbers
VOC expressed as total mass of organic carbon	75mg/Nm <sup>3</sup>	Manual extractive testing	Annually	HTC 2A HTC 2B (spraybooth)
Particulate Matter	50mg/Nm <sup>3</sup>	Manual extractive testing	Annually	HTC 2A HTC 2B

- 3.15 The introduction of dilution air to achieve emission limits is not permitted.
- 3.16 A minimum discharge velocity of 15m/s shall be applicable to all stacks, which shall discharge vertically upwards.

- 3.17 Shotblasting shall only occur in the dedicated shotblast booth with the extraction and filters running.
- 3.18 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.

#### Section 4 – Monitoring, Sampling and Measurement of Emissions.

- 4.1 The Permit holder or operator shall ensure that a detailed inventory of all solvent usage is kept. This inventory shall include cleaning solvent usage, use of thinners, and the solvent or organic compound content of coatings used, stored and purchased. The inventory shall also include all solvents removed from the site as waste and any quantities recovered for re-use. The inventory shall be kept on site and submitted to Sheffield City Council's Environmental Protection Service by 14<sup>th</sup> January each year and shall cover the period 1<sup>st</sup> January to 31<sup>st</sup> December of the previous year.
- 4.2 A calculation of the organic solvent consumption; the total mass of organic solvent inputs minus any solvents sent for recovery or re-use off site, shall be completed. The calculation of solvent consumption shall be by a mass balance method to determine the annual actual consumption of organic solvent. The mass balance calculation shall be carried out in accordance with Process Guidance Note 6/23(11). The consumption details shall be forwarded to Sheffield City Council's Environmental Protection Service by 14<sup>th</sup> January each year and shall cover the period 1<sup>st</sup> January to 31<sup>st</sup> December of the previous year.
- 4.3 A system to monitor and record the consumption of organic solvents used for coating against the quantity of items sprayed shall be used and maintained to minimise the amount of excess organic solvent used.
- 4.4 A summary of the records produced for the spraying monitoring system required by condition 4.3 of this Permit shall be submitted to Sheffield City Council's Environmental Protection Service by 14<sup>th</sup> January each year.
- 4.5 The Permit holder shall ensure that a visual assessment of emissions from the stack serving the bag filter unit in the shotblasting room is carried out once a week when shotblasting is being carried out. The assessments shall last for a duration of at least one minute. The results of the visual assessments shall be recorded in the log book kept in accordance with this Permit.
- 4.6 The Permit holder shall ensure that an odour assessment of emissions from the spraybooth is carried out at least once a day for a period of at least two minutes when spraying is being undertaken. The assessment shall be made down wind of the spraybooth stacks at a point on the installation boundary. The results of these assessments shall be recorded in the log book kept in accordance with this Permit.

- 4.7 The Permit holder or operator shall ensure that a log book containing all results of inspections and assessments made in accordance with Permit conditions is kept. The records shall include the date and time, the nature, colour, persistency and intensity of any emission and the name of the person carrying out the inspection. Adverse results shall be investigated immediately and in all cases shall be recorded in the log book. The log book shall be kept on the premises and made available for inspection by authorised officers of Sheffield City Council's Environmental Protection Service. Such records shall be kept for a minimum of two years and shall be furnished in writing to Sheffield City Council on demand.
- 4.8 All pollutant concentrations shall be expressed at reference conditions, 273K, 101.3 kPa with no correction for water vapour content.
- 4.9 Sheffield City Council's Environmental Protection Service shall be advised at least 7 days in advance of any periodic stack monitoring exercise. The site specific monitoring protocols shall be submitted and include the stacks to be tested, pollutants to be monitored, methods to be used and the competencies of the consultants undertaking the testing.
- 4.10 Results of any stack monitoring exercise shall be forwarded to Sheffield City Council's Environmental Protection Service within 8 weeks of completion of the exercise.
- 4.11 Adequate facilities for stack monitoring, in line with British or equivalent standards, shall be provided, and maintained, on vents or ducts to enable monitoring to determine compliance with Permit conditions.
- 4.12 Emissions of volatile organic compounds from spraybooth stacks HTC 2A and HTC 2B shall be monitored at least once in every twelve month period.
- 4.13 Emissions of total particulate matter from spraybooth stacks HTC 2A and HTC 2B 1 shall be monitored at least once in every twelve month period.
- 4.14 Non-continuous emissions monitoring of particulate matter from the spraybooth and shotblast booth shall be carried out in accordance with the main procedural requirements of BS ISO12141:2002 or BS EN 13284:Part 1 with averages taken over operating periods excluding start up and shut down, or by another method agreed in writing by Sheffield City Council Environmental Protection Service.. Sampling equipment should be capable of collecting particulate matter of 0.1 microns diameter or less, with an efficiency of at least 75%.
- 4.15 Monitoring shall be carried out in accordance with methods described in M1 "Sampling requirements for monitoring stack emissions to air from industrial installations"<sup>2</sup> and M2 "Monitoring of stack emissions to air", or by another method agreed in writing by Sheffield City Council's Environmental Protection Service.

<sup>2</sup>The Environment Agency's Monitoring Certification Scheme http://www.mcerts.net

- 4.16 Results of non-continuous monitoring shall include details of process conditions at the time of monitoring, monitoring uncertainties, any deviations from the procedural requirements of standard reference methods and any error invoked from such deviations.
- 4.17 In any case where the measured stack emissions exceed the emission limits specified in conditions 3.12 or 3.14 of this Permit, the Environmental Protection Service at Sheffield City Council shall be notified within one day of the operator receiving the results.
- 4.18 In the event of results from any stack monitoring activity demonstrating a breach of emission limit or other condition of Permit, the Permit holder shall undertake the following actions:
  - Cease using the plant identified as in breach of the emission limit immediately;
  - Investigate the cause immediately;
  - Carry out corrective action as soon as is practicably possible;
  - Record in the recording system required by condition 4.7 as much detail as possible regarding the cause and extent of the problem and the action taken to rectify the situation;
  - Notify Sheffield City Council's Environmental Protection Service in accordance with condition 4.17;
  - Undertake emissions re-testing following corrective action as soon as can be arranged;
  - Only re-start the process found to be responsible for the breach when it can be demonstrated to comply with emission limits and Permit requirements;
  - Notify Sheffield City Council's Environmental Protection Service within one day of becoming aware of the re-test results.
- 4.19 The Permit holder shall inform Sheffield City Council's Environmental Protection Service immediately in cases where:
  - An emission is likely to have an effect on neighbouring premises; or
  - There is a failure of any arrestment plant.

The report to Sheffield City Council's Environmental Protection Service shall include:

- The date and time of the incident;
- The cause and nature of the incident;
- Details of any abnormal emissions;
- Details of remedial action taken.

- 4.20 In cases of non-compliance causing immediate danger to human health, operation of the activity must be suspended. All of the following criteria shall be taken into account:
  - The toxicity of the substance being released;
  - The amount released;
  - The location of the installation;
  - The sensitivity of the receptors.

#### Section 5 – Materials Handling and Storage.

- 5.1 All spillages of solvents and particulates shall be cleared as soon as possible in accordance with a written Spill Procedure.
- 5.2 An adequate number of Spill Kits shall be provided and located in suitable areas in order to tackle spillages.
- 5.3 Spill Kits shall be checked frequently and the stocks maintained in order to ensure they are capable of tackling a spillage.
- 5.4 Clearance of dusty materials shall be achieved by the use of vacuum cleaning, wet methods, or other appropriate techniques. Dry sweeping is not permitted.
- 5.5 Dusty wastes shall be stored in closed containers and handled in a manner that prevents emissions of VOC's.
- 5.6 All organic solvents shall be stored in sealed containers prior to use.
- 5.7 Emissions from the emptying of storage and mixing vessels and the transfer of coating to the application area shall be contained by the use of covered or closed delivery systems.
- 5.8 All potentially odorous waste materials, for example, waste cleaning solvents, shall be stored in suitable enclosed containers in order to minimise emissions.
- 5.9 All reasonable efforts shall be made to minimise the amount of residual organic solvent bearing material left in drums and other containers after use.
- 5.10 Waste contaminated with solvents such as wiping cloths, gloves, overalls or material used to clear spillages shall be disposed of in a suitably labelled metal bin fitted with a self-closing lid.
- 5.11 Prior to disposal, empty drums and containers contaminated with organic solvent should be lidded to minimise emissions from residues during storage prior to disposal.
- 5.12 Drums or vessels containing solvent waste shall be labelled so that all persons handling the waste are aware of their contents.

- 5.13 All vessels or containers of organic solvents shall be stored in a bunded zone which shall extend to completely surround the container, be impervious and resistant to the liquids in storage and be capable of holding 110% of the capacity of the largest container.
- 5.14 Empty drums or drums containing solvent contaminated waste shall be stored in a secure and well ventilated area.
- 5.15 All steps shall be taken by the spraying operatives to ensure that overspray is prevented.
- 5.16 The use of thinners shall be controlled and monitored.

#### Section 6 – Management, Training and Maintenance.

- 6.1 Effective, preventative maintenance shall be employed on all plant and equipment concerned with the control of emissions to air.
- 6.2 Plant and equipment shall be operated and maintained in accordance with the manufacturer's recommendations.
- 6.3 Any malfunction or breakdown, such as arrestment plant failure, leading to abnormal emissions shall be dealt with promptly and process operations shall be adjusted until normal operations can be restored. All such malfunctions shall be recorded in the log book kept in accordance with condition 4.7 of this Permit.
- 6.4 An audit of items of pollution abatement plant and equipment shall be undertaken. The audit shall identify all plant and equipment that is critical to prevent, reduce or control emissions from the installation, including but not limited to filters, alarms, detection systems, sprayguns, bunds and Spill Kits. A copy of the audit shall be submitted to Sheffield City Council's Environmental Protection Service for written approval within 8 weeks of the date of this Permit.
- 6.5 A preventative maintenance schedule shall be produced for all plant and equipment identified from the audit required by condition 6.4. A copy of the maintenance schedule shall be submitted to Sheffield City Council's Environmental Protection Service for written approval within 8 weeks of the date of this Permit.
- 6.6 Records of breakdowns and plant failure shall be kept and analysed in order to eliminate common failures. The records shall be made available for inspection by officers of Sheffield City Council's Environmental Protection Service on demand.

- 6.7 The Permit holder or operator shall ensure that all abatement plant, such as spraybooth filters and shotblast arrestment plant is serviced at least once in every 12 month period by a competent person. Details of the maintenance shall be kept on site and made available for inspection by authorised officers of Sheffield City Council's Environmental Protection Service.
- 6.8 Essential spares and consumables such as filters shall be held on site or available at short notice from guaranteed suppliers, in order to rectify a breakdown rapidly.
- 6.9 The Permit holder or operator shall ensure that a visual inspection of the condition of the extraction systems, filters, associated housing and ductwork is carried out at least once a week for the spraybooth and shotblast booth. Any faults, accumulations, deposits, damaged or clogged filters or any other defect shall be rectified without delay. The result of these inspections and any remedial action taken shall be recorded in the log book kept in accordance with this Permit.
- 6.10 Records of maintenance checks and work shall be kept for at least 2 years. The programme and records shall be made available to Sheffield City Council's Environmental Protection Service upon request.
- 6.11 Staff at all levels shall receive the necessary training in their duties relating to control of the process and emissions to air. The training shall include:
  - i. awareness of responsibilities under this Permit with particular emphasis on conditions likely to give rise to VOC emissions such as spillages;
  - ii. minimising emissions at start-up and shut-down;
  - iii. actions to minimise emissions during abnormal operations.
- 6.12 The Permit holder or operator shall retain a statement of training requirements for each operational post. A training record shall be kept for each person whose actions may have an impact on the environment. These documents shall be made available to Sheffield City Council's Environmental Protection Service upon request.
- 6.13 Chimney flues and ductwork shall be inspected at least once every 6 months and cleaned as necessary in order to prevent accumulation of material both on the internal ducting and on external ledges. Details of the inspection and any cleaning necessary as a result of the inspection shall be recorded in the log book kept in accordance with Condition 4.7 of this Permit.
- 6.14 The Permit holder or operator shall review cleaning operations involving organic solvents at least once in every 2 years to identify opportunities for reducing VOC emissions. The conclusions of the review shall be forwarded to Sheffield City Council's Environmental Protection Service. The first submission shall be made by 14th January 2013.

- 6.15 Where manual cleaning using organic solvents is unavoidable:
  - a) cleaning solvents shall be kept in enclosed containers while not in use;
  - b) Wiping cloths or brushes shall be pre-impregnated using a dispenser or similar device;
  - c) used cloths or brushes shall be stored in sealed containers pending recovery or disposal; and
  - d) where possible it shall be done within a spray booth served by an extraction system.

#### Section 7 – Substitution Plan

- 7.1 Designated "Risk Phrase" or "hazard statement" materials<sup>1</sup>, used in the installation must be replaced, or controlled and limited, as set out in PG 6/23(11).
- 7.2 The Permit holder or operator shall maintain a register of designated "risk phrase" or "hazard statement" materials<sup>1</sup> used in the installation. The register shall be made available for inspection by Sheffield City Council's Environmental Protection Service upon request.
- 7.3 The Permit holder or operator shall submit a substitution plan to Sheffield City Council's Environmental Protection Service by 1<sup>st</sup> December 2012. The plan shall describe how the operator is replacing designated substances assigned with Risk Phrase R45, R46, R49, R60 or R61. If replacement of the Risk Phrase substance is not practical, the plan shall include details of the reasons for this, and details of how the operator is controlling and limiting the use of these substances. The substitution plan shall also contain details of how the use of R40 designated substances is being limited and controlled. The plan shall be updated as necessary and updates shall be forwarded to Sheffield City Council's Environmental Protection Service.
- 7.4 The operator shall inform Sheffield City Council's Environmental Protection Service in writing of any proposed changes to the Risk Phrase register at least 7 days prior to the changes taking place.

<sup>&</sup>lt;sup>1</sup> Materials designated, because of their VOC content: Until 1 Jun 2015: risk phrase R45, R46, R49, R60 or R61. From 1 Dec 2010: hazard statement H340, H350, H350i, H360D or H360F. Materials designated because of their halogenated VOC content: Until 1 Jun 2015: risk phrase R40, or from 1 Dec 2010 until 1 Jun 2015, risk phrase R68. From 1 Dec 2010: hazard statements H341 or H351. As from 1<sup>st</sup> Dec 2010 "risk phrase" materials will also be known as "hazard statement" materials. Either term will apply until 1 Jun 2015, when only the term "hazard statement" materials will apply.

### Section 8 – Solvent Management Plan

- 8.1 By 1<sup>st</sup> December 2012 the operator or Permit holder shall produce and submit a Solvent Management Plan to Sheffield City Council's Environmental Protection Service. The Solvent Management Plan shall be produced in accordance with PG 6/23 (11) and include details of the fugitive emissions.
- 8.2 The Solvent Management Plan shall be reviewed at least annually. Review records and updates to the Solvent Management Plan shall be forwarded to Sheffield City Council's Environmental Protection Service annually by 14<sup>th</sup> January. The first submission is required by 14<sup>th</sup> January 2013.
- 8.3 The operator or Permit holder shall submit details to Sheffield City Council's Environmental Protection Service for written approval any proposal to carry out any of the following activities:
  - Replacement of low or no VOC solvent coating systems with conventional high VOC content coating systems;
  - Introduction of conventional high VOC content coating systems into the process;
  - Introduction of conventional high VOC content coating systems onto products where it was not previously used;
  - Introduction of high solids formulations which have no beneficial effect on the product but increase the solids used, except where a reduction in the overall VOC emissions can be demonstrated.

## Section 9.0 General Conditions.

- 9.1 The Permit holder or operator shall notify the following to Sheffield City Council's Environmental Protection Service, in writing, within 14 days of their occurrence:-
  - Any change in the trading name of HTC Plant Limited registered name or registered office address;
  - A change to any particulars of any ultimate holding company of HTC Plant Limited (including details of an ultimate holding company where HTC Plant Limited has become a subsidiary);
  - Any steps taken with a view to HTC Plant Limited going into administration, entering into a company voluntary arrangement or being wound up.
- 9.2 The Permit holder or operator shall give written notification to Sheffield City Council in the following instances;
  - a) Permanent cessation of the operation of any part of, or all of the Permitted Installation;
  - b) Cessation of the operation of any part of, or all of the Permitted Installation for a period, likely to exceed 1 year;
  - c) Resumption of the operation of any part of, or all of the Permitted installation after a cessation notified under (b) above.

9.3 All reports and notifications required by this Permit, or under any Regulation under the Environmental Permitting Regulations 2010, as amended, shall be sent to Sheffield City Council's Environmental Protection Service. Unless notified in writing, all reports, notifications and communications in respect of this Permit shall be sent to:

Sheffield City Council, Environmental Protection Service, 2-10 Carbrook Hall Road, Sheffield S9 2DB.

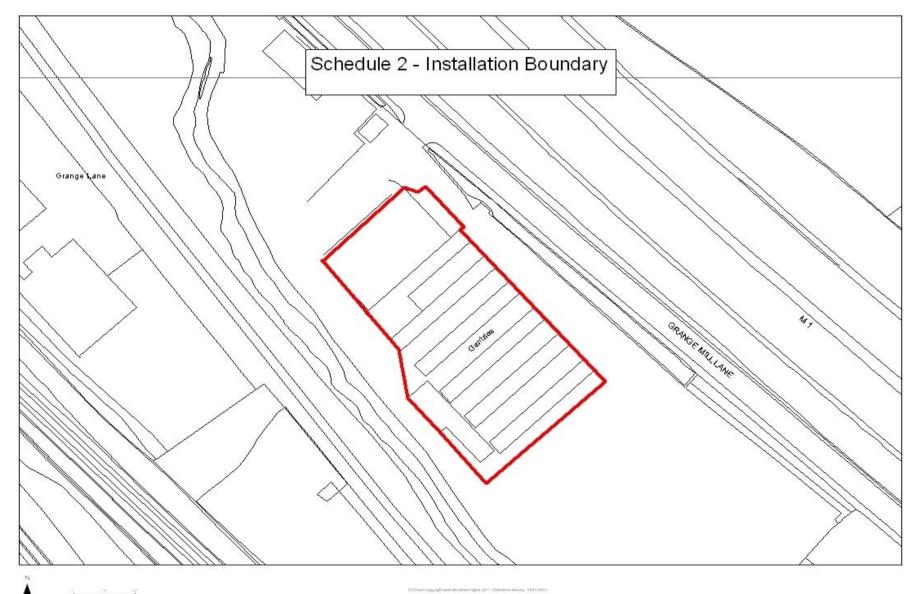
- 9.4 A record shall be made at the Permitted Installation of any complaints concerning the installation's effect or alleged effect on the environment. The record shall give the date of complaint, time of complaint, a summary of any investigation and the results of such investigation. Such records shall be made in a log kept for this purpose.
- 9.5 Records kept in accordance with this Permit shall be legible, be made as soon as reasonably practicable and indicate any amendments which have been made and shall include the original record wherever possible.
- 9.6 Chimneys, stacks or process vents shall not be fitted with any restriction at the final opening, for example, a plate, cap or cowl. A cone fitted at the chimney exit to increase efflux velocity shall be permitted.

Schedule 1 – Site Location



#### 6.4/022761/JT

## Schedule 2 – Installation Boundary



Schedule 3 – Installation Layout and Emissions Points

