

Permalite FAQ June 2023

What is the Permit Application About?

Permalite Gloucester Limited, 170 Bristol Road, Gloucester, GL1 5TT has applied to Gloucester City Council for an Environmental Permit to operate a solvent-based activity which involves:

- **the use of more than 200 Tonnes of solvents per annum which is highly regulated to ensure minimal emissions to air, (*The 200 tonnes relates to the threshold of solvent usage per annum to warrant the A2 permit and not the emissions to air*)**
- **under Section 6.4 A2 & Schedule 14 the Environmental Permitting Regulations.**

Why is there a Public Consultation?

Public Consultation

- Gloucester City Council must take the steps it considers appropriate to inform public consultees of the application within 30 working days of it having been duly made, and where and when it can be inspected free of charge.
- This must include an invitation to make representations on the application, specifying the deadline for comments and where to send them.
- Local authorities must take into account any representations made by consultees during the allowed time periods
- Consultation serves to inform the public (and other interested bodies) so that they can make better informed comments to the local authority allowing the regulator to make better decisions.
- Consultation can provide the authority with relevant facts and views that it might not otherwise have from the application, to help with its determination. This applies to applications for permits and for a substantial change to existing permits.

What Laws Regulate the Process?

Legislation & Key Considerations:

- Pollution Prevention & Control Act 1999
- Environmental Permitting (England & Wales) Regulations 2016 (as amended)
- Regulation 13 & Schedule 5 Paragraph 6

How will the Site be Regulated or Inspected to ensure the permit is complied with?

The site would be regulated by Worcester Regulatory Services on behalf of Gloucester City Council, and in line with an approved Environmental Management System and permit conditions relating to this under the Environmental Permitting (England & Wales) Regulations 2016, to ensure that emissions, including fugitive emissions, from the factory are suitably abated and minimised to

ensure that nearby sensitive receptors are not adversely impacted. Emissions from the factory will be annually monitored to demonstrate compliance with the VOC and particulate matter emission limits of the Industrial Emissions Directive <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:334:0017:0119:EN:PDF> / Best Available Techniques Conclusions for the surface treatment using solvents activity (STS) <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32020D2009> .

Local Authority Integrated Pollution Prevention and Control (LA-IPPC)

- applies an integrated environmental approach to the regulation of certain industrial activities (known as “A2” or “Part A2” installations).
- It involves determining the appropriate controls for industry to protect the environment through a single permitting process.
- This means that emissions to air, water (including discharges to sewer) and land, plus a range of other activities with an environmental impact, must be considered together.
- It also means that local authorities, if they approve an application for an environmental permit, must set permit conditions to achieve a high level of protection.

These conditions must be based on the use of the ‘Best Available Techniques’ (BAT), which balances the costs to the operator against the benefits to the environment.

For Reference here are some information Links:

[General Guidance Manual on Policy and Procedures for A2 and B Installations](#)
[Sector Guidance Note SG6 \(11\), Secretary of State’s Guidance for Surface Treatment Using Solvents](#)

If A2 application is granted, Permali can produce over 200 tonnes of emissions per annum and will be legally bound on levels of emission (refer to slides once received).?

The 200 tonnes relate to the threshold of solvent usage per annum to warrant the A2 permit not the emissions. Through the terms of the permit including use of the solvent will be a fraction of that.

Annual Emissions testing will be a requirement of the permit and continuously monitor temperatures to ensure destruction of the Oxidised emissions.

What is Permali doing to reduce odour?

Permali have purchased and are installing new fume abatement equipment which is much better at reducing emissions than the current equipment. This equipment will be installed, tested and commission during Summer and Autumn of 2023.

Will Permali’s emissions of VOC’s of increase if the A2 permit is granted?

Emissions will not increase, as part of this expansion Permali has committed to investing in additional fume treatment equipment which is currently being installed to ensure that VOC concentrations are significantly lower than they currently are.

Identify legal decibel levels permitted from industrial units and compare this against the A2 application documents. ?

There is no legal limit for industrial noise other than Noise at Work so the A2 permit level will be based on BS4142 relative to the background noise.

How can this be monitored by residents without high-tech equipment, and are we expected to accept Permali's word that they are within levels.?

All equipment used to assess noise is calibrated by third parties and it is criminal offence to falsify records etc.

What is Permali doing to minimise noise?

Permali has installed sound enclosures around noisy equipment. Permali is also investigating further technical solutions such as secondary barriers to reduce noise further from some of this equipment.

If Dimaorph were to breach the limit on emissions, what course of action would the council take to ensure that the residents don't have to breath the fumes whilst still enjoying their homes and gardens and what would the council do to reverse any impact on the natural environment?

In the event of a leak, accident, or breach of the emissions limit, how would residents be informed so they can close windows or temporarily leave the area?

For both above it is the legal responsibility of Permali/Dimorph to report incidents to the City Council, accidental emissions are not expected to be this detrimental, had this been the case they would have to apply for a different type of permit and a regulatory structure under the Environment Agency and the Health & Safety Executive not the district authority.