

Gloucester City Council

Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Permali Gloucester Limited
170 Bristol Road
Gloucester
GL1 5TT

Permit Reference Number

23/00006/A2

PERMALI GLOUCESTER LIMITED

Permit Reference number 23/00006/A2

Introductory note

This introductory note does not form a part of the permit

This permit is granted by Gloucester City Council (The Council) under Regulation 13 of the Environmental Permitting (England & Wales) Regulations 2016 to operate an installation involving the surface treating of substances, objects or products using organic solvents with a consumption capacity of more than 200 tonnes per year of solvents.

Brief description of the process

- Section 6.4 Part A (2) and Schedule 14 Solvent Emission Activities
- The process involves impregnation with preformulated resins of wide-web woven glass fibre cloths and tissue and subsequent conversion to a composite laminate material. Subsequent stages of cutting, pressing and curing followed by machining to shape produce the products which are either packed for shipping or subject to a final spray-coating in proprietary spray booths.
- VOC emissions from the preformulated resin mixing, impregnation and curing activity and cleaning processes are extracted to a gas fired regenerative thermal oxidiser (RTO) and activated carbon filter. Particulate matter emissions from cutting and machining activities are extracted to filtration systems. The principal releases from the installation comprise VOC, NO_x and CO emissions from the RTO, VOC emission from the carbon filter unit, abated particulate emissions from cutting and machining activities, and noise from external plant / equipment. Waste streams associated with the installation include Solvent, Oil / Water mix, wood, Garnett sand (used as a cutting abrasive, cardboard, filter system particulate matter and waste product from the machining / pressing activities. There are Four on-site gas fired boilers, (2 classed as Medium Combustion Plant and regulated by the EA) supplying heat and steam for running the presses, emitting products of combustion.
- The site is located adjacent to the Gloucester and Sharpness Canal. To the East and West of the site are residential properties, there are no SSSI's within 2km of the facility.
- Schedule 7 details the site location and boundary, the site layout and emission points to air.

The Installation is operated by Permal Gloucester Limited and is located at 170 Bristol Road, Gloucester, Gloucestershire, GL1 5TT, England.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

| Status log of the permit | | |
|--------------------------------------|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Date | Comments |
| Application received 03/03/23 | Duly made 03/05/2023 | Application for an A2 solvent coating activity namely the impregnation of textiles in a plant with a consumption capacity of more than 200 tonnes per year. |
| Additional Information notice served | 27/7/2023 | Further information in respect of noise and odour management plans, Update site plan including carbon filtration unit, emission results from RTO and unabated emission sources. |
| Additional information received | 4/10/2023 | Updated site plan showing all emission to air points, emission results from RTO, Carbon filter and unabated emission sources. Noise action and management plan and odour management plan. |
| Permit determined 23/00006/A2 | 21/11/2023 | Permit Issued |

End of introductory note

Permit to Operate

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

23/00006/A2

Operator Name: **Permali Gloucester Limited**

whose registered office is 170 Bristol Road, Gloucester, GL1 5TT

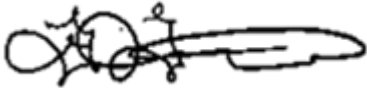
company registration number 03546214

to operate an installation at

170 Bristol Road, Gloucester, GL1 5TT

to the extent authorised by and subject to the conditions of this permit.

Signed:



Name

Gupti Gosine

An Authorised Officer of The Council

Dated

21/11/2023

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written environmental management system (EMS) that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out

1.2 Energy efficiency

- 1.2.1 The operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
 - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
 - (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

- 1.3.1 The operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
 - (b) maintain records of raw materials and water used in the activities;
 - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
 - (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and

- (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in Schedule 1 table S1.1 (the “activities”).

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in red on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 For the activities referenced in schedule 1, table S1.1 the activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Regulator.
- 2.3.2 If notified by the Regulator that the activities are giving rise to pollution, the operator shall submit to the Regulator, for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Regulator.
- 2.3.3 The operator shall
- (a) identify the process areas, sections or steps that make the greatest contribution to VOC emissions and energy consumption, which have the greatest potential for improvement;
 - (b) identify and implement actions to minimise VOC emissions and energy consumption;
 - (c) review progress and update actions on an annual basis.
- 2.3.4 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.
- 2.3.6 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Regulator.
- 2.4.2 Except in the case of an improvement which consists only of a submission to the Regulator, the operator shall notify the Regulator within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in Schedule 3 tables S3.1, The limits given in Schedule 3 shall not be exceeded.
- 3.1.2 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.
- 3.1.3 The operator shall
- (a) maximise the availability and performance of equipment critical to the protection of the environment;
 - (b) record all periods of other than normal operation conditions (OTNOC), their cause and duration and where possible their effect on emissions.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise those emissions.
- 3.2.2 The operator shall:
- (a) if notified by the Regulator that the activities are giving rise to pollution, submit to the Regulator for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Regulator.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Monitoring

- 3.3.1 The operator shall, unless otherwise agreed in writing by the Regulator, monitor total and fugitive VOC emissions by compiling, at least on an annual basis, a solvent mass balance of the solvent inputs and outputs of the plant, as defined in Part 7(2) of Annex VII to Directive 2010/75/EU.

The solvent mass balance shall include:

- identification and documentation of solvent inputs and outputs, (e.g. emissions in waste gases, emissions from each fugitive emission source, solvent output in waste);

- substantiated quantification of each relevant solvent input and output and recording of the methodology used (e.g. measurement, calculation using emission factors, estimation based on operational parameters);
- identification of the main sources of uncertainty of the aforementioned quantification, and implementation of corrective actions to reduce the uncertainty;
- regular update of solvent input and output data.

The solvent mass balance calculation methodology shall be agreed in writing by the Regulator.

3.3.2 The operator shall, unless otherwise agreed in writing by the Regulator, undertake the monitoring specified in the following tables in schedule 3 to this permit:

- (a) point source emissions specified in tables S3.1,
- (b) process monitoring specified in table S3.3;

3.3.3 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

3.3.4 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.3.2 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Regulator.

3.3.5 Permanent means of access shall be provided to enable sampling / monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, unless otherwise agreed in writing by the Regulator.

3.4 Odour

3.4.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Regulator. The operator shall implement the approved and incorporated Odour Management Plan as detailed in S1.2.

3.5 Noise and vibration

3.5.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Regulator, The operator shall implement the approved and incorporated Noise Management Plan as detailed in S1.2.

4 Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by the Regulator, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:

- (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.
- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Regulator.

4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Regulator using the contact details supplied in writing by the Regulator.
- 4.2.2 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Regulator, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
 - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4 ; and
 - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.3 A report or reports on the performance of the activities over the previous year shall be submitted to the Regulator by 31 January (or other date agreed in writing by the Regulator) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
 - (b) the annual production / treatment data set out in schedule 4 table S4.2; and
 - (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Regulator, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 The operator shall submit an annual solvent management plan in order to demonstrate compliance with the requirements of the Industrial Emissions Directive, by 31 January each year in respect of the previous year.

4.3 Notifications

- 4.3.1 In the event:
- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform the Regulator,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
 - (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Regulator, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;

- (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Regulator has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Regulator when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Regulator at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Regulator shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (c) any change in the operator's name or address; and
 - (d) any steps taken with a view to the dissolution of the operator.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
 - (a) the Regulator shall be notified at least 14 days before making the change; and
 - (b) the notification shall contain a description of the proposed change in operation.
 - 4.3.6 The Regulator shall be given at least 14 days' notice before implementation of any part of the site closure plan.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately" in which case it may be provided by telephone.

Schedule 1 – Operations

| Table S1.1 activities | | |
|------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| Activity listed in Schedule 1 of the EP Regulations | Description of specified activity | Limits of specified activity and waste types |
| S6.4 A(2) (a) and Schedule 14 | Impregnation with preformulated resins of wide-web woven glass fibre cloths and tissue and subsequent conversion to a composite laminate material., in plant with a consumption capacity of more than 150kg or more per hour or 200 tonnes per year. | Application of resins onto substrates to produce composite product. |
| Directly Associated Activities | | |
| Storage and handling of raw materials | Storage of solid and liquid materials in drums and IBCs, bags and other containers | Receipt and storage of raw materials to transfer to process areas |
| Storage, handling and dispatch of finished products, waste & other materials | Storage of finished products. Process waste segregation and storage | Internal storage of finished products, storage of waste in designated areas and loading for transit off site |
| Machining of products arising from impregnation process | Machining of products | Extraction and collection of particulate matter in filtration systems |
| Spray coating of product | Final spray coating of specific product with solvent containing substrate | Storage of solvent containing coatings, their application and disposal of solvent containing wastes |

| Table S1.2 Operating techniques | | |
|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| Description | Parts C=Compliant NC=Non Compliant | Date Received |
| Review of Environmental Management System | Summary of BAT review (BAT 1,2, and 13) <i>Assessment of BAT conclusion requirements doc 1,2 NC EMS systems under development IP008-001-009</i> 13 C | 13/6/2023 |
| | Summary of the BAT review (BAT 3) Selection of raw materials <i>Assessment of BAT conclusion requirements doc NC EMS to include procedures</i> | 13/6/2023 |
| BAT Reviews | Summary of the BAT review (BAT 4 and 5) <i>Assessment of BAT conclusion requirements doc 4. C Working with suppliers and customers to reduce VOCs where feasible. 5 NC – Storage/mixing area proposals being implemented 2023</i> | 13/6/2023 |
| | Summary of the BAT review (BAT 6 to 9) <i>Assessment of BAT conclusion requirements</i> | 13/6/2023 |

| Table S1.2 Operating techniques | | |
|---------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| Description | Parts C=Compliant NC=Non Compliant | Date Received |
| | <i>doc 6</i> NC New dedicated solvent mixing area being installed. <i>7</i> C Coating techniques <i>8</i> . NC Drying system to be upgraded . <i>9</i> . C Techniques to minimise solvent based cleaning agents | |
| | Summary of the BAT review (BAT 14 to 17) Assessment of BAT conclusion requirements <i>doc 14</i> . C Techniques used. <i>15</i> . C RTO Techniques <i>16</i> . C RTO Process controls <i>17</i> . C RTO Process controls | 13/6/2023 |
| | Summary of the BAT review (Bat 18) Assessment of BAT conclusion requirements <i>doc 14</i> C | 13/6/2023 |
| Energy Efficiency | Energy Efficiency Plan (BAT 19) NC EEP to be developed | 13/6/2023 |
| Odour management plan | Odour management plan (BAT 23) C | 4/10/2023 |
| Noise management plan | Noise management plan C | 4/10/2023 |

| Table S1.3 Improvement programme requirements | | |
|------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| Reference | Requirement | Date |
| IP1 | The operator will submit their Environmental Management System (EMS) against the requirements of BAT 1 of the STS BAT Conclusions for approval. | 6 Months from the issue date of this permit |
| IP2 | The operator shall submit for approval a management plan for the prevention and control of leaks and spillages, which meets the requirements of BAT 3 of the STS BAT conclusions. | 6 Months from the issue date of this permit |
| IP3 | The operator will carry out a review as to whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use (as described in condition 1.3.1 (c)), taking account of BAT 5 and 20 of the STS BAT conclusions. | 6 Months from the issue date of this permit |
| IP4 | The operator will carry out a review for the drying and curing operations, against the requirements of BAT 8 of the STS BAT conclusions. The operator will produce a report describing how the installation is BAT, in particular where techniques other than those described in BAT 8 are used, how these achieve an equivalent level of performance. | 6 Months from the issue date of this permit |
| IP5 | The operator will carry out a review of energy efficiency (as described in condition 1.2.1 (b)), taking account of BAT 19 and Table 18.3 of the STS BAT conclusions. | 6 Months from the issue date of this permit |

Schedule 2 – Waste types, raw materials and fuels

| Table S2.1 Raw materials and fuels | |
|-------------------------------------------|----------------------|
| Raw materials and fuel description | Specification |
| Natural gas fuel for RTO | Natural gas |

Schedule 3 – Emissions and monitoring

| Table S3.1 Point source emissions to air – emission limits and monitoring requirements | | | | | | |
|----------------------------------------------------------------------------------------|-------------------------------------|---------------------------------------------------------------------------|------------------------|----------------------------------|-------------------------------------------------------------------|-------------------------------|
| Emission point ref. & location | Source | Parameter | Limit (including unit) | Reference period | Monitoring frequency | Monitoring standard or method |
| Point 32 on site plan in Schedule 7.2 | Thermal Oxidiser | Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂) | 130 mg/Nm ³ | Average over the sampling period | Minimum of once per year | BS EN 14792 |
| Point 32 on site plan in Schedule 7.2 | Thermal Oxidiser | TVOC | 20 mg/Nm ³ | Average over the sampling period | Minimum of once per year | BS EN 12619 |
| Point 31 on site plan in Schedule 7.2 | Carbon Filtration Unit | TVOC | 20 mg/Nm ³ | Average over the sampling period | Minimum of once per 6 month period | BS EN 12619 |
| Points 28 and 29 on site plan in Schedule 7.2 | Machine Shop Dust Abatement Systems | Particulate matter (Dust) | 20 mg/Nm ³ | Average over the sampling period | Continuous Indicative monitoring and Minimum of once per year | BS EN 13284-1 |
| SPRAYBOOTHS Points 18-22 on site plan in Schedule 7.2 | Coating of product | TVOC | 50 mg/Nm ³ | Average over the sampling period | Minimum of once per year | BS EN 12619 |
| SPRAYBOOTHS Points 18-22 on site plan in Schedule 7.2 | Coating of product | Particulate matter (Dust) | 50 mg/Nm ³ | Average over the sampling period | By guarantee from manufacturer or by annual extractive monitoring | BS EN 13284-1 |

Note 1: Certification to the MCERTS performance standards indicates compliance with BS EN 15267-3

| Table S3.2 Annual limits for fugitive emissions | | |
|-------------------------------------------------|----------|---------------------------|
| Substance | Medium | Limit (including unit) |
| TVOC | Fugitive | < 5% of the solvent input |

| Table S3.3 Process monitoring requirements | | | | |
|----------------------------------------------------------------------------------|--------------------------------|-----------------------------|--------------------------------------|-----------------------------------------------------------|
| Emission point reference or source or description of point of measurement | Parameter | Monitoring frequency | Monitoring standard or method | Other specifications |
| Thermal oxidiser Emission Point 32 | Combustion Temperature | Continuous | | Audible and visual alarm if temperature drops below 800°C |
| Thermal oxidiser Emission Point 32 | Carbon Monoxide | Continuous | | Audible & Visual Alarms >150mg/Nm ³ |
| Particulate Filtration Systems 28 and 29 | System Pressure Drop indicator | Continuous | | Audible & Visual Alarms |

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

| Table S4.1 Reporting of monitoring data | | | |
|---------------------------------------------------------------|------------------------------------------------------------|-------------------------|----------------------|
| Parameter | Emission or monitoring point/reference | Reporting period | Period begins |
| Emissions to air Parameters as required by condition 3.1.1 | (Dust plants 28,29), (Carbon Filter 31) and (RTO 32) | Every 12 months | 1 January |

| Table S4.2: Annual production/treatment | |
|------------------------------------------------|----------------------------------|
| Parameter | Units |
| Area of coated surface | m ² of coated surface |
| Mass of Solvent Consumed | kg |

| Table S4.3 Performance parameters | | |
|------------------------------------------|--------------------------------|--------------------------------------|
| Parameter | Frequency of assessment | Units |
| Specific energy consumption | Annually | kWh/m ² of coated surface |

| Table S4.4 Reporting forms | | |
|-----------------------------------|----------------------------------------------|---------------------|
| Media/parameter | Reporting format | Date of form |
| Emission to Air | Format as agreed in writing by the Regulator | |
| Performance parameters | Format as agreed in writing by the Regulator | |
| Ground water | Format as agreed in writing by the Regulator | |
| Soil | Format as agreed in writing by the Regulator | |

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

| | |
|--------------------------------|--|
| Permit Number | |
| Name of operator | |
| Location of Facility | |
| Time and date of the detection | |

| | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| (a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution | |
| To be notified within 24 hours of detection | |
| Date and time of the event | |
| Reference or description of the location of the event | |
| Description of where any release into the environment took place | |
| Substances(s) potentially released | |
| Best estimate of the quantity or rate of release of substances | |
| Measures taken, or intended to be taken, to stop any emission | |
| Description of the failure or accident. | |

| | |
|-------------------------------------------------------------------------------------|--|
| (b) Notification requirements for the breach of a limit | |
| To be notified within 24 hours of detection unless otherwise specified below | |
| Emission point reference/ source | |
| Parameter(s) | |
| Limit | |
| Measured value and uncertainty | |
| Date and time of monitoring | |

| | |
|-------------------------------------------------------------------------------------|--|
| (b) Notification requirements for the breach of a limit | |
| To be notified within 24 hours of detection unless otherwise specified below | |
| Measures taken, or intended to be taken, to stop the emission | |

| | |
|------------------------------------------------------------------------------------------------|--|
| (c) Notification requirements for the breach of permit conditions not related to limits | |
| To be notified within 24 hours of detection | |
| Condition breached | |
| Date, time and duration of breach | |
| Details of the permit breach i.e. what happened including impacts observed. | |
| Measures taken, or intended to be taken, to restore permit compliance. | |

| | |
|--------------------------------------------------------------------------------------------------------|--|
| (d) Notification requirements for the detection of any significant adverse environmental effect | |
| To be notified within 24 hours of detection | |
| Description of where the effect on the environment was detected | |
| Substances(s) detected | |
| Concentrations of substances detected | |
| Date of monitoring/sampling | |

Part B – to be submitted as soon as practicable

| | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Any more accurate information on the matters for notification under Part A. | |
| Measures taken, or intended to be taken, to prevent a recurrence of the incident | |
| Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission | |
| The dates of any unauthorised emissions from the facility in the preceding 24 months. | |
| Name* | |
| Post | |
| Signature | |
| Date | |

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“abatement system” means that equipment dedicated to the removal of polluting substances from releases from the installation to air or water media.

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Regulator under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emission of a substance not controlled by an emission limit” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

“emissions to land” includes emissions to groundwater.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005 No.894, the Hazardous Waste (Wales) Regulations 2005 No. 1806 (W.138), the List of Wastes (England) Regulations 2005 No.895 and the List of Wastes (Wales) Regulations 2005 No. 1820 (W.148).

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions as read in accordance with Schedule 1 to the Environmental Permitting (England and Wales) Regulations 2016.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“Volatile Organic Compound” (VOC) means any organic compound means any organic compound as well as the fraction of creosote, having at 293.15 K, a vapour pressure of 0.01 kPa or more, or having a corresponding volatility under the particular conditions of use.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes (England) Regulations 2005, or List of Wastes (Wales) Regulations 2005, as appropriate, and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste.

“year” means calendar year ending 31 December.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- (a) in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or
- (b) in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

Schedule 7 – Site Location, Plan and Emission Points



Imagery © 2023 CNES/airbus,getmapping PLC, Infoterra Ltd and Blue Sky, Maxar technologies, The Geoinformation group, map data © 2023.

7.1 Emission Points

PERMALI LTD PROCESS LOCATIONS
AND EMISSION POINTS



- Emission Point - Zones
1. Horizontal coating processes x 2
 2. Vertical coating process x 1
 3. Machining Shops x 4
 4. Oxidiser
 5. Paint Spraying
 6. Raw Material and waste storage

Permall Map 005
25092023

Emission Extract Points (Manufacturing)

| Extraction Point | Equipment | Process |
|------------------|---------------------|-----------------------------|
| 1 | Large RDM Oven | Post cure |
| 2 | RDM Oven | Post cure |
| 3 | Rostron Oven | Post cure |
| 4 | CPL Presses | NF |
| 5 | CPL Presses | NF |
| 6 | 48" spary booth | Spray Coating Release Agent |
| 7 | 48" press | Press |
| 8 | Op near 700te Press | Layup |
| 9 | New Boilers | Press |
| 10 | New Boilers | Press |
| 11 | Bipel Press | NF |
| 12 | Bipel Press | NF |

| | | |
|----|-------------------------------------------------------------|--------------------------------------------|
| 13 | Bipel Press | NF |
| 14 | Large Tube Wrapper | Conversion |
| 15 | Small Tube Wrapper | Conversion |
| 16 | Boiler | Press |
| 17 | Boiler | Press |
| 18 | Paint Booth | Spraying |
| 19 | Paint Booth | Spraying |
| 20 | Paint Booth | Spraying |
| 21 | Paint Booth | Spraying |
| 22 | Paint Booth | Spraying |
| 23 | STL | Drying sealed edges Alonso |
| 24 | Curing Oven | Ceramic post cure and plank bonding |
| 25 | German | Press |
| 26 | Autoclave | Pressure Relief valve to atmosphere no VOC |
| 27 | Machine shop 2 Ovens x 3 | Post curing |
| 28 | V9 | LEV extraction |
| 29 | Dust Plant 5 | LEV extraction |
| 30 | Hotwell | Water Treatment for Steam Boiler |
| 31 | Pre-impregnation plant and mixing - Carbon Filter Abatement | NF Impregnation |
| 32 | Regenerative Thermal Oxidiser | Vertical and horizontal impregnation |

END OF PERMIT