



Simplified Permit

**Pollution Prevention and Control Act 1999
Environmental Permitting (England and Wales) Regulations 2010**

***Benchmark Fabrications Limited
Jubilee House
Jubilee Road
Letchworth Garden City
Hertfordshire
SG6 1WU***

**Regulated activity:
*Powder Coating***

**Permit Number:
*EPA/01861/13/P1***

Permit Issued by:

North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

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The address for all correspondence in relation to this permit

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Permit Status Log

Detail	Date	Comment
<i>EPA/01861/13</i>	<i>28th November 2013</i>	<i>Application Duly Made</i>
<i>EPA/01861/13/P1</i>	<i>7th March 2014</i>	<i>Draft simplified permit</i>
<i>EPA/01861/13/P1</i>	<i>14th March 2014</i>	<i>Issued</i>

Introductory Note

These introductory notes are not Environmental Permit conditions; however they do provide useful information about the Environmental Permitting Regulations:

The following Permit is issued under Regulation 13(1) of the Environmental Permitting (England and Wales) Regulations 2010 (S.I 2010 No.675) (as amended), ("the EPR") to operate a scheduled installation carrying out an activity, or activities covered by the description in section 6.4B(a) of Part 2 to Schedule 1 of the EPR, to the extent authorised by the Permit.

Conditions within this Permit detail Best Available Techniques (BAT), for the management and operation of the installation, to prevent, or where that is not practicable, to reduce emissions.

In determining BAT, the Operator should pay particular attention to relevant sections of the LAPPC Process Guidance note (PG6/31(13)), and any other relevant guidance. Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Note that the Permit requires the submission of certain information to the Regulator, and in addition, the Regulator has the power to seek further information at any time under Regulation 60 of the EPR Regulations provided that the request is reasonable.

Public Registers

Information relating to Permits, including the application, is available on public registers in accordance with the EPR. Certain information may be withheld from the public registers where it is commercially confidential, or if it is in the interest of national security to do so.

Variations to the Permit

The Regulator may vary the Permit in the future, by serving a variation notice on the Operator. Should the Operator want any of the conditions of the Permit to be changed, a formal application must be submitted to the Regulator (the relevant forms are available from the Regulator). The Status Log includes a summary of the Permits and variations issued up to that point in time and state whether a consolidated version of the Permit has been issued.

Transfer of the Permit or part of the Permit

Before the Permit can be wholly or partially transferred to another Operator, an application to transfer the Permit has to be made jointly by the existing and proposed Operators. A transfer will not be approved if the Regulator is not satisfied that the proposed Permit holder will be the person having control over the operation of the installation, or will not comply with the conditions of the transferred Permit. In addition, if the Permit authorises the Operator to carry out a specified waste management activity, the transfer will not be approved if the Regulator does not consider the proposed Permit holder to be a 'fit and proper person' as required by the EPR.

Talking to us

Please quote the permit number if you contact the Regulator about this permit. To give a notification under this permit, please use the contact details on the front cover.

Description of the installation and regulated activity

This description of the installation and the regulated activity are not environmental permit conditions, however they do provide useful information about the installation and the activities undertaken. It also provides a reference point in relation to any substantial or non-substantial changes.

Benchmark Fabrications Limited is a manufacturer of retail display products, and operates a powder coating activity as part of that process.

Powder coating is the technique of applying dry 'paint' in powder form to the item to be coated, then curing the item in an oven to melt the powder into a continuous film coating.

Items to be coated are hung on jigs and manually loaded onto an automated conveyor line. Surface contaminants and grease are removed from the items to be coated in a three stage iron phosphate pre-treatment system.

The cleaned and treated items are ready for coating after they have been dried in a drying oven.

The drying oven is fired using natural gas, and is operated at around 165°C. Coating powder is applied in a spray booth using manually operated and reciprocating electrostatic spray guns within a cyclone extraction and recovery system. Recovered coating powder is re-used as far as possible.

The coating is cured in a natural gas fired stoving oven set to between 195°C and 205°C, where the coating melts, flows out and chemically reacts to form a high molecular weight polymer in a network-like structure of the final set coating.

Cured coated items are removed from the conveyor jig and are used in the relevant display construction.

The equipment in use at the installation is as follows:

Activity	Plant & equipment	Notes
Pre-treatment	Chemetall pre-treatment plant	<ul style="list-style-type: none">➤ Iron phosphate pre-treatment.➤ No chromate conversion or pickling activities are undertaken.➤ External venting
Coating	Air Master MJC 801661314 Booth and Air Master Standard powder coating spray booth with filtration system and coating powder fed gun	<ul style="list-style-type: none">➤ No external venting
Coating	Wet curtain booth	<ul style="list-style-type: none">➤ External venting
Curing	Curing oven	<ul style="list-style-type: none">➤ External venting

Authorisation



Permit Reference Number:
EPA/01861/13/P1

North Hertfordshire District Council (“the Regulator”) in exercise of its powers under Regulation 13(1) of the Environmental Permitting (England and Wales) Regulations 2010 (SI 2010 No 675) (as amended), hereby authorises **Benchmark Fabrications Limited** (“the Operator”).

Whose registered office is:

Benchmark Fabrications Limited
Jubilee House
Jubilee Road
Letchworth Garden City
Hertfordshire
SG6 1WU

Company registration number: **2980858**

To operate an installation at:

Benchmark Fabrications Limited
Jubilee House
Jubilee Road
Letchworth Garden City
Hertfordshire
SG6 1WU

The Operator is authorised to carry out the following activities* to the extent authorised by and subject to the conditions of this Permit.

1. Powder Coating where the use of coating material (which is applied in solid form) in any 12-month period is likely to be 20 tonnes or more as described in Section 6.4B(a) ‘Coating Activities’ of the Environmental Permitting (England and Wales) Regulations 2010 (as amended).

And the following associated activities:

1. None

This Permit shall be subject to replacement, variation or amendment as may be considered appropriate by North Hertfordshire District Council, at any time, according to the provisions of Regulation 20 of the EPR.

* This Permit is given in relation to the requirements of the Environmental Permitting Regulations. It must not be taken to replace any responsibilities you may have under Workplace Health and Safety legislation. Nothing in this Permit grants or implies any consent under the Town and Country Planning Act.

Signed

Dated this day

14th March 2014

David Carr
Environmental Protection Officer
The Authorised Officer for this purpose

Conditions

The following are Environmental Permit conditions and are legal requirements.

Emissions

1. No visible particulate matter shall be emitted beyond the installation boundary marked in red in schedule 1.

Process controls

2. Odour emissions shall be minimised by:
 - controlling curing oven temperatures (temperature not exceeding 210°C);
 - not using curing ovens to clean jigs.

Bulk, loose, dry material – storage and loading

3. Dusty materials (including dusty wastes) shall only be stored in closed containers, and in the powder coating plant, identified as the area edged in blue on the plan attached as Schedule 1 to this permit and their storage and transfer shall be subject to suppression and management techniques to minimise dust emissions. No potentially dusty materials (including wastes) or finished products shall leave the site other than by use of closed containers or sealed wrappings.

Monitoring provisions

4. The emission requirements and methods and frequency of monitoring set out in **Table 1** shall be complied with. Sampling shall be representative.
5. Any continuous monitor fitted to show compliance with **Row 1** of **Table 1** of this permit shall be equipped with a visible and/or audible alarm warning of abatement failure or malfunction. Alarms shall activate when emissions reach 75% of the relevant emission limit in **Table 1** and each alarm activation shall be automatically recorded. *Where fitted as a requirement of this condition, alarms shall be tested at least once a week.*
6. Oven temperatures shall be continuously monitored. Alarms shall activate when temperatures reach the maximum specified in condition 1.
7. Any monitoring display required for compliance with the permit (including temperature displays) shall be visible to operating staff at all times. Corrective action shall be taken immediately if any periodic monitoring result exceeds a limit in **Table 1**, or if there is a malfunction or breakdown of any equipment which might increase emissions. Monitoring shall be undertaken or repeated as soon as possible thereafter and a brief record shall be kept of the main actions taken.
8. All plant and equipment capable of causing, or preventing, emissions and all monitoring devices, including thermocouples, shall be calibrated and maintained in accordance with the manufacturer's instructions. *Records shall be kept of such maintenance*.
9. The Operator shall, in the case of abnormal emissions, inform the regulator without delay if there is an emission likely to have an effect on the local community.

Records and training

10. Written or computer records of all tests and monitoring shall be kept by the Operator for at least 24 months. They shall be made available for examination by the Regulator. *Records shall be kept of operator inspections, including those for visible and odorous emissions.*
11. Staff at all levels shall receive the necessary training and instruction to enable them to comply with the conditions of this permit. *Records shall be kept of relevant training undertaken*.

Best available techniques

12. 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.
13. 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.

Interpretations and Explanatory Notes

These interpretations and explanatory notes does not form part of your Environmental Permit conditions, however they do provide useful information about the Environmental Permitting Regulations:

In relation to this Permit, the following expressions shall have the following meanings:

<i>“Activity”</i>	An activity listed in Part 2 of Schedule 1 to the EP Regulations which will form part of an EP installation or be a mobile plant
<i>“The EPR / EP Regulation”</i>	Means the Environmental Permitting (England and Wales) Regulations 2010 S.I. 2010 No.675 (as amended) and words and expressions defined in the EPR shall have the same meanings when used in this Permit save to the extent they are explicitly defined in this Permit.
<i>“Change in Operation”</i>	In relation to an installation or mobile plant, a change in its nature or functioning or an extension which may have consequences for the environment.
<i>“Enforcement notice”</i>	A notice served by a local authority to enforce compliance with the permit conditions or require remediation of any harm following a breach of any condition.
<i>“Installation”</i>	A stationary technical unit where one or more activities listed in Part 2 of Schedule 1 to the EP Regulations are carried out and any other location on the same site where any other directly-associated activities are carried out. and any activities that are technically linked. The terms ‘regulated facility’ and ‘installation’ are, in effect, interchangeable for A(2) and B activities.
<i>“Operator”</i>	The person who has control over the operation of the installation/regulated facility (EP Regulation 7).
<i>“Permit”</i>	A permit granted under EP Regulation 13 by a local authority allowing the operation of an installation subject to certain conditions.
<i>“Pollution”</i>	Any emission as a result of human activity which may be harmful to human health or the quality of the environment, cause offence to any human senses, result in damage to material property, or impair or interfere with amenities and other legitimate uses of the environment (EP Regulation 2(1)).
<i>“Revocation notice”</i>	A notice served by the Regulator under EP regulation 22 revoking all or part of a permit.
<i>“Permitted Installation”</i>	Means the activities and the limits to those activities described in this Permit.
<i>“Monitoring”</i>	Includes the taking and analysis of samples, instrumental measurements (periodic and continual), calibrations, examinations, tests and surveys.
<i>“MCERTS”</i>	Means the Environment Agency’s Monitoring Certification Scheme.
<i>“Fugitive Emission”</i>	Means an emission to air or water (including sewer) from the Permitted installation that is not controlled by an emission limit imposed by a condition of this Permit.
<i>“Regulator”</i>	Means any officer of North Hertfordshire District Council who is authorised 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(1) of that Act.
<i>“Best Available Techniques (BAT)”</i>	<p>Best available techniques means the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing in principle the basis for emission limit values designed to prevent, and where that is not practical, generally to reduce emissions and the impact on the environment as a whole.</p> <p>For those purposes: "Available techniques" means those techniques which have been developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the cost and advantages, whether or not the techniques are used or produced inside the United Kingdom, as long as they are reasonably accessible to the Operator;</p> <p>"Best" means, in relation to techniques, the most effective in achieving a high general level of protection of the environment as a whole;</p> <p>"Techniques" includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned. Schedule 2 of the Regulations shall have effect in relation to the determination of best available techniques.</p>

Where any condition of this Permit refers to the whole or parts of different documents, in the event of any conflict between the wording of such documents, the document with the most recent publication date shall be taken to be the most appropriate document to be used.

You have the right of appeal against this permit within 6 months of the date of the decision and you will normally be expected to pay your own expenses during an appeal.

You will be liable for prosecution if you fail to comply with the conditions of this permit. If found guilty, the maximum penalty for each offence if prosecuted in a Magistrates Court is £50,000 and/or 6 months imprisonment. In a Crown Court it is an unlimited fine and/or 5 years imprisonment.

Our enforcement of your permit will be in accordance with the Regulators' Compliance Code.

Appeals relating to installations in England should be received by the Secretary of State for Environment, Food & Rural Affairs. The address is as follows;

The Planning Inspectorate
Environment Team, Major and Specialist Casework
Room 4/04 – Kite Wing
Temple Quay House
2 The Square
Temple Quay
Bristol, BS1 PN

The appeal must be in the form of a written notice or letter stating that the person wishes to appeal and listing the condition(s) which is/are being appealed against. The following five items must be included;

- (a) A statement of the ground of appeal;
- (b) A copy of any relevant application;
- (c) A copy of any relevant Permit;
- (d) A copy of any relevant correspondence between the person making the appeal (“the appellant”) and the Council;
- (e) A statement indicating whether the appellant wishes the appeal to be dealt with.
 - By a hearing attended by both parties and conducted by an inspector appointed by the Secretary of State; or
 - By both parties sending the Secretary of State written statements of their case (and having the opportunity to comment upon one another’s statements).

At the same time, the notice of appeal and documents (a) and (e) must be sent to the Council, and the person making the appeal should inform the appropriate Secretary of State that this has been done.

- An appeal will not suspend the effect of the conditions appealed against; the conditions must still be complied with.
- In determining an appeal against one or more conditions, the Act allows the Secretary of State in addition to quash any of the other conditions not subject to the appeal and to direct the local authority to either vary any of these conditions or to add new conditions.

Table 1 - Emission limits, monitoring and other provisions

Row	Substance	Source	Emission limits/provisions	Type of monitoring	Monitoring frequency
1	Total particulate matter	Emissions from contained processes with an airflow greater than 50m ³ /minute	10 mg/m ³	Indicative monitoring from vents over 50m ³ /min: <ul style="list-style-type: none"> ➤ audible and visual alarms plus <ul style="list-style-type: none"> ➤ extractive test 	<ul style="list-style-type: none"> ➤ continuous plus <ul style="list-style-type: none"> ➤ annual
2	Droplets, persistent visible emissions	All releases to air (except steam and condensed water vapour).	No droplets, no persistent visible emissions	Visual observations	Daily, at the request of the regulator

Notes

a) The reference conditions for limits in Table 1 are: 273.1K, 101.3kPa, without correction for water vapour content, unless stated otherwise.

b) All periodic monitoring shall be representative and shall use standard methods.

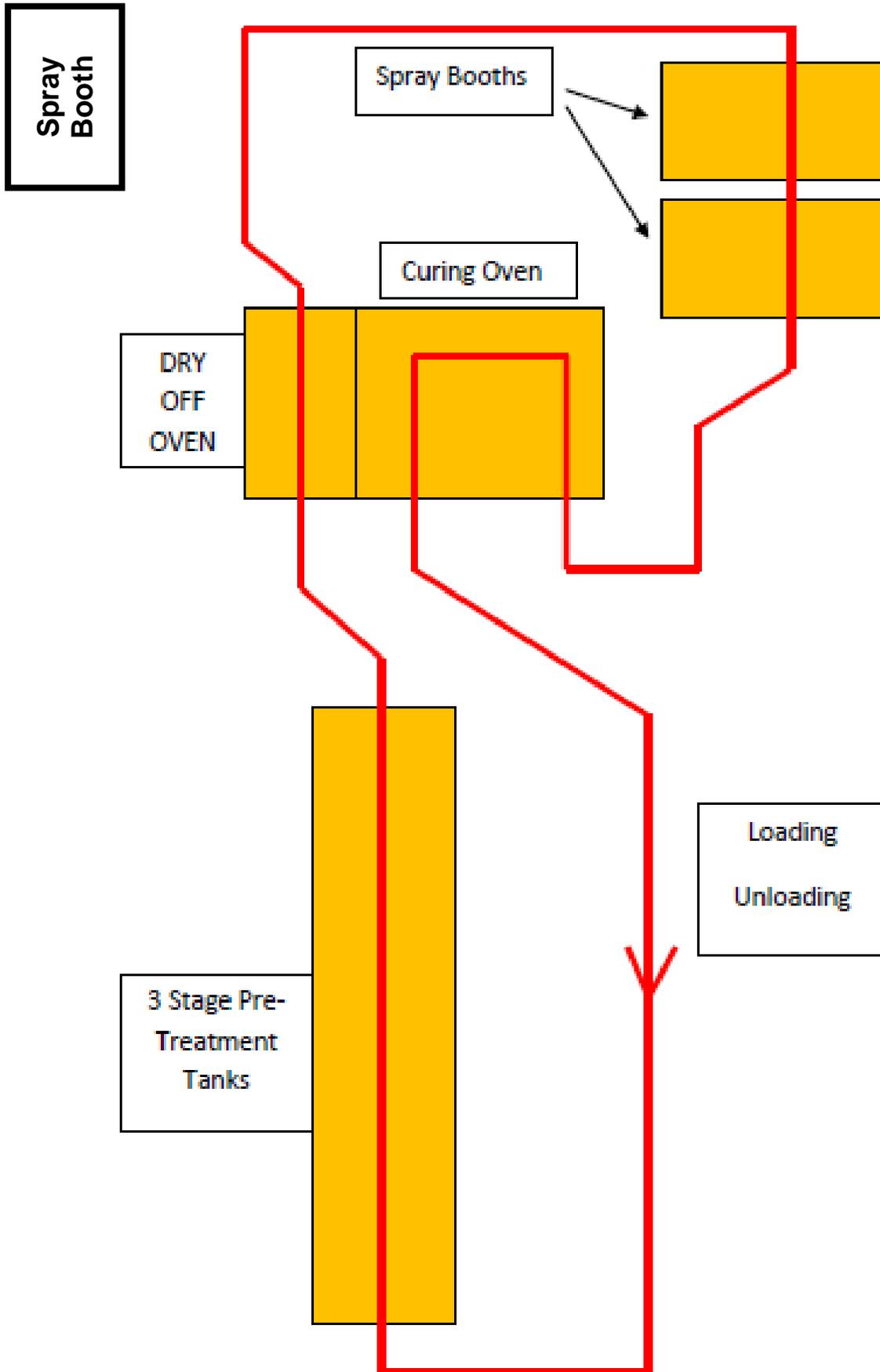
c) All periodic monitoring results shall be checked by the operator on receipt and sent to the Council within 8 weeks of the monitoring being undertaken.

d) The continuous monitoring provision should be disapplied where emissions do not exceed 10mg/m³ without the use of abatement plant. This should be demonstrated by a single representative sampling exercise. A further such monitoring exercise may be required in the event of a substantial change to the process.

e) Coating removal by heat – potential for odorous emissions – a purpose- designed oven should be used (see PG 2/9).



Site	Benchmark Fabrications Limited		
Project	Permit application		
Drawing	Schedule 1 - Location plan	No.	EPA/01861/13/P1
Date	3 rd January 2014	Scale	Not to scale



Site	Benchmark Fabrications Limited		
Project	Permit application		
Drawing	Schedule 2 - Site plan	No.	EPA/01861/13/P1
Date	3 rd January 2014	Scale	Not to scale