



## **Permit with Introductory Note**

**Environmental Permitting (England and Wales)  
Regulations 2010 (as Amended)**

**Installation address**

**Autoglym Limited  
Works Road  
Letchworth  
Hertfordshire  
SG6 1LU**

**Permit Reference: EPA/00675/03/P2**

Permit and introductory note LA-PPC



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## Introductory Note

*This introductory 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 one or more of the activities listed in Part B to Schedule 1 of those Regulations, to the extent authorised by the Permit.

The Permit includes conditions that have to be complied with. It should be noted that aspects of the operation of the installation which are not regulated by specific conditions are subject to the Best Available Techniques condition placed in the permit, that the Operator shall use the best available techniques for preventing or, where that is not practical, reducing emissions from the installation.

Please note techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

### Brief description of the installation regulated by this permit:

Installation for the manufacture of coating and waxes as prescribed by Schedule 1, Part B Section 6.5 and Section 7 of the Environmental Permitting Regulations 2010 (As Amended), utilising the preparation areas and plant (edged in red) on the attached plan and involving the delivery and storage of raw materials, dispensing of raw materials, premixing, pigment dispersion and milling, dispersion, filtering, process equipment cleaning and storage/removal of waste.

Process Guidance Note used for this installation: PG6/44(11)

Superseded Licences/Consents/Permits relating to this installation		
Holder	Reference Number	Date of Issue
Autoglym Limited	DB/01/CM/12/01	03/09/02
Autoglym Limited	EPA/00675/03	26/04/05
Autoglym Limited	EPA/00675/03/P1	04/01/07

### Confidentiality

The Permit requires the Operator to provide information to North Hertfordshire District Council. The Council will place the information onto the public registers in accordance with the requirements of the EP Regulations. If the Operator considers that any information provided is commercially confidential, it may apply to North Hertfordshire District Council to have such information withheld from the register as provided in the EP Regulations. To enable North Hertfordshire District Council to determine whether the information is commercially confidential, the Operator should clearly identify the information in question and should specify clear and precise reasons.

### Variations to the permit

Your Attention is drawn to the Variation Notification Procedure condition in the permit. This Permit may be varied in the future. If at any time the activity or any aspect of the activity regulated by the following conditions changes such that the conditions no longer reflect the activity and require alteration, the Regulator should be contacted.



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### **Surrender of the permit**

Where an Operator intends to cease the operation of an installation (in whole or in part) the Regulator should be informed in writing, such notification must include the information specified in regulation 24, or in accordance with Regulation 25 of the EP Regulations for Permits to which Regulation 24 does not apply.

### **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 the Authority 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.

### **Responsibility under workplace health and safety legislation**

This Permit is given in relation to the requirements of the EP regulations. It must not be taken to replace any responsibilities you may have under Workplace Health and Safety legislation.

### **Appeal against permit conditions**

Anyone who is aggrieved by the conditions attached to a Permit can appeal to the Appropriate Authority, (Secretary of State for the Environment, Food and Rural Affairs, in England and the Welsh Ministers in Wales) Appeals must be made in accordance with the requirements of Regulation 31 and Schedule 6 of the EP Regulations.

Appeals should be received by the Secretary of State for Environment, Food and Rural Affairs or the Welsh Ministers at the following addresses:

The Planning Inspectorate  
Environment Team, Major and Specialist Casework  
Room 4/04 Kite Wing  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol BS1 6PN

Or for appeals in Wales:

The Planning Inspectorate  
Crown Buildings  
CathaysPark  
CARDIFF  
CF10 3NQ

### **Please Note**

An appeal brought under Regulation 31 (2) (b), (c) and Schedule 6, in relation to the conditions in a permit 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 either to vary any of these other conditions or to add new conditions.

Our enforcement of this permit will be in accordance with the Regulators' Compliance Code. A copy is on the Business, Innovation and Skills Department website: <http://www.bis.gov.uk/files/file45019.pdf>.

**End of introductory note**



**Permit issued under the Environmental Permitting  
(England and Wales) Regulations 2010 (as Amended)**

**Permit Reference: EPA/00675/03/P2**

North Hertfordshire District Council (the Regulator) in exercise of its powers under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010 (S.I. 2010 No. 675) hereby permits:

**Autoglym Limited** (“the Operator”)

Whose principal office is:

**Autoglym Limited  
The Altro Group Plc  
Works Road  
Letchworth  
Hertfordshire  
SG6 1NW**

**Company Number: 01480449**

To operate an installation at:

**Autoglym Limited  
Works Road  
Letchworth  
Hertfordshire  
SG6 1LU**

to the extent authorised by and subject to the description and boundaries within the conditions of this Permit.

Signed

**David Carr  
Authorised to sign on behalf of  
North Hertfordshire District Council**

Dated



**PERMIT CONDITIONS**

**EXTENT AND LIMIT OF THE INSTALLATION**

1. If the Operator proposes to make a change in the 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.
2. 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 dry cleaning facility which is not regulated by any other condition of this permit.

**3. The Permitted Installation**

3.1 The Operator is authorised to carry out the activities and/or the associated activities specified in Table A.

<b>Table A</b>			
<b>Activities under Schedule 1 of the Regulations/Associated Activity</b>	<b>Description of specified activity</b>	<b>Schedule 1 activity Reference (if Applicable)</b>	<b>Limits of specified activity</b>
Storage and Handling of raw materials	Storage of waxes resins pigments and solvents	Directly associated activity	Receipt and storage of raw materials.
Preparation activities	Preparation of coating materials including milling and dispersion	Directly associated activity	Preparation activities within the buildings outlined in 3.2 below only.
Formulation and production of coating materials	Coating manufacture	6.5 Part B and 7	Manufacture within the buildings outlined in 3.2 below only.
Storage and handling of solid and liquid wastes including cleaning.	Storage of waste solvents and coatings including solvent for recycling.	Directly associated activity	From cleaning and the separation of waste to dispatch from installation.

3.2 The activities authorised under condition 3.1 shall not extend beyond the boundary of the site shown in red.



**Site Location**



**4. Emission limits, monitoring and other provisions**

**Non VOC Emission Limits**

4.1 The installation shall comply with the emission limits in Table B below;

Substance	Source	Emission limits/provisions	Type of monitoring	Monitoring frequency
Particulate matter	From contained sources	50 mg/Nm <sup>3</sup> as 8 hour mean where non-continuous monitoring is undertaken for contained sources.	Manual Extractive testing in accordance with BS ISO 9096:2003 (where not internally vented.)	Regarded as achieved where previous testing has shown less than 25% of the emission limit, or where abatement plant vents internally, or vents via bag filtration plant designed to achieve the emission limit, otherwise annually.

**Total Emission Limit Value (No VOC Abatement)**

4.2 The total emission limit value set out in table C below shall be met

VOC in waste gases	Total Emission Limit Values/ Requirements	Monitoring Annual manual extractive testing
Site consumption less than 1000 tonnes.	5% of organic solvent input.	Fugitive emission limits determined in accordance with Schedule A to this Permit.

4.3 The total emission from the activity expressed as a percentage of the organic solvent input into the activity shall be equal to or less than the total emission limit value.



### **Solvent Management Plan**

- 4.4 The Operator shall produce a Solvent Management Plan that shall be updated annually and submitted to the Regulator annually. The Solvent Management Plan shall be produced using the definitions and calculations set out in Schedule A (reproduced from PG Note 6/44(11)) of this Permit.

### **Other provisions**

#### **Monitoring, investigation and recording**

- 4.5 The Operator shall keep records (log book) of inspections, tests and monitoring, including all non-continuous monitoring, inspections and visual assessments. The records should be:
- kept on site
  - kept by the Operator for at least two years and
  - made available for the Regulator to examine
- 4.6 If any records are kept off site they should be made available for inspection within one working week of any request by the Regulator.
- 4.7 A written plan for the maintenance and inspection of the tank farm and production plant shall be implemented and maintained. For the production plant; maintenance and checks shall be incorporated into the company's standard operating procedures.

#### **Visible and odorous emissions**

- 4.8 Emissions from any combustion process shall be free from visible smoke in normal operation and in any case shall not exceed the equivalent of Ringelmann Shade 1 as described in BS2742:2009.
- 4.9 All releases to air, other than condensed water vapour, should be free from persistent visible emissions.
- 4.10 All emissions to air shall be free from droplets.
- 4.11 There shall be no offensive odour beyond the site boundary, as perceived by the Regulator.

#### **Abnormal events**

- 4.12 Where abnormal emissions, malfunctions or breakdowns leading to abnormal emission occur the Operator shall;
- investigate **immediately** and undertake corrective action
  - adjust the process or activity to minimise those emissions; and
  - promptly record (within one working day) the events and actions taken.
- 4.13 The Regulator should be informed without delay whether or not there is related monitoring showing an adverse result:
- If there is an emission that is likely to have an effect on the local community; or
  - In the event of the failure of key arrestment plant, for example, bag filtration plant or scrubber units

### **5. Control Techniques**

#### **VOC and odour control; storage**





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- 5.1 Coatings containing VOC's (including thinners and cleaning solvents) shall be stored in closed storage containers.
- 5.2 Bulk storage tanks for organic solvents and organic solvent containing liquids should wherever practicable be back vented to the delivery tank during filling. Where this is impracticable, displaced air vents should be sited in such a way as to prevent the arising of offensive odour beyond the site boundary.

### **VOC control; operational**

- 5.3 The written procedure for the handling of bulk solvents shall be followed during delivery handling onto the site (see Schedule B) and movement of solvents whilst on the site.
- 5.4 All fixed tanks shall be fitted with high level alarms or volume indicators to warn of overfilling. Where practicable the filling systems should be interlocked to the alarm system to prevent overfilling.
- 5.5 All new bulk storage tanks containing organic solvent with a vapour pressure that is likely to exceed 0.4kPa at 20°C shall be fitted with pressure vacuum relief valves.
- 5.6 All pressure vacuum relief valves shall be examined for signs of contamination, incorrect seating, and be cleaned/and or corrected as required every 6 months.
- 5.7 The delivery connections to the above ground tank farm shall be within the bunded area.
- 5.8 By 31<sup>st</sup> December 2013, all outdoor tanks containing any organic solvent and organic solvent-borne coating material, inks and adhesives must be painted in a light colour or stainless steel.
- 5.9 The bunding to the above ground tank farm shall-
  - i. completely surround the bulk liquid storage tanks,
  - ii. be impervious and resistant to the liquids in storage, **and**
  - iii. be capable of holding 110% of the capacity of the largest storage tank.

### **VOC Handling**

- 5.10 All measures shall be taken to minimise VOC emissions during mixing, i.e. the use of covered or closed mixing vessels.
- 5.11 Emissions from the emptying of mixing vessels and transfer of materials shall be adequately contained, preferably by the use of closed transfer systems. This may be achieved by the use of closed mobile containers, containers with close-fitting lids, or, preferably, closed containers with pipeline delivery.
- 5.12 Wherever practical in relation to occupational safety and explosion hazards, continuous extraction of air from vessels should be avoided for example, by the use of an interlock to ensure that extraction can only commence when the vessel inspection hatch or manhole is opened.

### **VOC Cleaning**

- 5.13 Where cleaning operations involve the use of organic solvents the dispensing of cleaning solvents should be:
  - in the case of fixed manufacturing equipment from a contained device or automatic system when applied directly;
  - dispensed by piston type dispenser or similar contained device, when used on wipes



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- 5.14 Where organic solvent is used on wipes:
- pre-impregnated wipes should be held within enclosed container prior to use
  - where practicable no organic solvent cleaning fluids or significantly less volatile organic solvents cleaning fluids should be used (with or without the addition of mechanical, chemical or thermal enhancements)
- 5.15 Where practicable, fixed equipment should be enclosed be cleaned in-situ and such equipment should, where practicable, be kept enclosed whilst cleaning is carried out.
- 5.16 Any cleaning operations involving organic solvents should be periodically reviewed, normally at least every two years to identify opportunities for reducing VOC emissions (e.g. cleaning steps that can be eliminated or alternative cleaning methods). The Regulator should be provided with a report on the conclusions of the review.

### VOC Control Waste

- 5.17 Drums shall be sealed unless opened for dispensing solvent or receiving waste solvent. Containers should be labelled so that all persons handling them are aware of their contents and hazardous properties.
- 5.18 Empty pots shall be lidded or drained and dried.
- 5.19 Dirty solvent and coatings shall be recycled on or off site and copies of any receipts shall be kept for 3 years.
- 5.20 Prior to disposal used wipes and other items contaminated with organic solvent should be placed in a suitably labelled metal bin fitted with a self-closing lid.  
**Note:** from a health and safety point of view it is advised that bins should be emptied at least daily, as they not only present a fire hazard, they may undergo spontaneous combustion.
- For materials that may undergo spontaneous combustion special bins that allow air to circulate beneath and around them to aid cooling are advised or other bins specifically designed for this purpose.

### General Control Techniques

#### Dust and spillage control

- 5.21 Suitable organic solvent containment and spillage equipment shall be available in all organic solvent handling areas.
- 5.22 Dry sweeping of dusty materials should not normally be permitted unless there are environmental or health and safety risks in using alternative techniques.
- 5.23 Dusty wastes should be stored in closed containers and handled in a manner that avoids emissions.
- 5.24 A high standard of housekeeping shall be maintained

## 6. Management

### Appropriate management systems

- 6.1 Staff at all levels shall receive the necessary training and instruction in their duties relating to the control of the process emissions to air. Training shall include;
- a. Awareness of their responsibilities under the permit.
  - b. Minimising emissions on start-up and shutdown.



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c. Action to minimise emissions during abnormal conditions.

6.2 The Operator shall maintain a statement of training requirements for each post with the above mentioned functions and keep a record of the training received by each person. These documents should be made available to the Regulator on request.

## 7. Maintenance

7.1 Effective preventative maintenance shall be employed on all aspects of the process including plant, buildings and the equipment concerned with the control of emissions to air.

The Operator should have the following available for inspection by the Regulator:

- A written maintenance programme for all pollution control equipment; **and**
- A record of maintenance that has been undertaken

## End of Conditions

### SCHEDULE A (reproduced from Process Guidance Note 6/44(11))

#### Compliance with the Total Emission Limit Values

Compliance is achieved if the total emission from the activity expressed as a percentage of the organic solvent input to the activity is equal to or less than total emission limit value:

- where total emission is equal to the mass of organic solvent released in the waste gases (see SED Box 9 of PG 6/44(11)) **PLUS** the fugitive releases

Total emission =  $O_1 + \text{Fugitive}$

And organic solvent input is equal to the quantity of organic solvents purchased and used in the process **PLUS** the quantity of organic solvents recovered and reused as organic solvent input into the process as determined as part of the solvent management plan.

Organic solvent input (I) =  $I_1 + I_2$

Compliance with the total emission limit value is achieved if:

$\frac{\text{Total emission}}{\text{Organic solvent input}} \times 100$  is equal or less than Total emission limit value

The "VOC workbook" follows the compliance requirements above and provides suitable methods for determining both the contained and fugitive releases from an installation and may be used as a tool for demonstrating compliance with the Total emission limit value.

#### Determination of Solvent Consumption (from PG 6/44 (11))

4.7 Construction of inventories of materials consumed and disposed of may involve the identification of individual organic solvents, or solids. This may give rise to an issue of commercial confidentiality. Information supplied must be placed on the public register, unless exclusion has been granted on the grounds of commercial confidentiality or national security. (Further guidance can be found in the appropriate chapter of the relevant General Guidance Manual)



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- 4.8 A determination of the organic solvent consumption, (the total mass of organic solvent Inputs minus any solvents sent for reuse/recovery off-site), should be made, and submitted to the Regulator annually, preferably to coincide with the Operator's stocktaking requirements, in the form of a mass balance in order to determine the annual actual consumption of organic solvent (C):

Where:  $C = I_1 - O_8$  (see 4.11 below)

### Solvent Management Plan

- 4.9 The Solvent Management Plan provides definitions and calculations to demonstrate compliance with the VOC requirements of this note. The use of the standard definitions and calculations also ensures consistency of VOC compliance across installations with an industrial sector.
- 4.10 The SED provides guidance on what constitutes a solvent input and an output (see paragraph 4.11 below). This can be described as needing data on:

#### Inputs:

How much solvent is:

- Bought, whether in pure form or contained in products
- Recycled back into the process

#### Outputs:

How much solvent is:

- Emitted to air, whether directly or via abatement equipment
- Discharged to water, whether directly or via water treatment
- Sent away in waste
- Lost by spills, leaks etc
- Leaving the installation in the product

The "VOC workbook", provides a suitable method for determining the solvent consumption. Ref: VOC Workbook (date of publication December 2003), British Coating Federation, James House, Bridge Street, Leatherhead, KT22 7EP. (Tel. 013722 360660; email: enquiry@bcf.co.uk) and www.coatings.org.uk

There is guidance on the Business Link website about solvent management

### 4.11 Definitions:

The following definitions provide a framework for the mass balance calculations used in determining compliance.

**Inputs of Organic Solvent** in the time frame over which the mass balance is being calculated (I)

- I<sub>1</sub> The quantity of organic solvents, or their quantity in preparations purchased which are used as input into the process/activity (including organic solvents used in the cleaning of equipment, but not those used for the cleaning of the products).

A calculation of the purchased organic solvent Input (I<sub>1</sub>) to the process/activity, is carried out by recording:



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- (i) The mass of organic solvent contained in raw materials and preparations in the initial stock (IS) at the start of the accounting period; plus
- (ii) The mass of organic solvent contained in raw materials and preparations in the purchased stock (PS) during the accounting period.
- (iii) Minus the mass of organic solvent contained in raw materials and preparations in the final stock (FS) at the end of the accounting period.

Total Organic Solvent Input ( $I_1$ ) = IS + PS – FS

$I_2$  The quantity of organic solvents or their quantity in preparations recovered and reused as solvent input into the process/activity. (The recycled solvent is counted every time it is used to carry out the activity.)

**Outputs of Organic Solvents** in the time frame over which the mass balance is being calculated (O)

- $O_1$  Emissions in waste gases.
- $O_2$  Organic solvents lost in water, if appropriate taking into account waste water treatment when calculating  $O_5$ .
- $O_3$  The quantity of organic solvents which remains as contamination or residue in products output from the process/activity.<sup>1</sup>
- $O_4$  Uncaptured emissions of organic solvents to air. This includes the general ventilation of rooms, where air is released to the outside environment via windows, doors, vents and similar openings.
- $O_5$  Organic solvents and/or organic compounds lost due to chemical or physical reactions. (including for example those which are destroyed, e.g. by thermal oxidation or other waste gas or waste water treatments, or captured, e.g. by adsorption, as long as they are not counted under  $O_6$ ,  $O_7$  or  $O_8$ ).
- $O_6$  Organic solvents contained in collected waste.
- $O_7$  Organic solvents, or organic solvents contained in preparations, which are sold or are intended to be sold as a commercially valuable product.
- $O_8$  Organic solvents contained in preparations recovered for reuse but not as input into the process/activity, as long as not counted under  $O_7$ .
- $O_9$  Organic solvents released in other ways.

<sup>1</sup> Not applicable to coatings manufacturing processes. Solvents in products are deliberately present.

## SCHEDULE B

### Autoglym standard operating procedure for receiving solvent deliveries to overground Storage Tanks.

- The Emergency Escape Route must be clear before the delivery is started.
- Ensure the yard and roadway is clear of obstruction.



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- Ensure that you have the correct PPE to perform operation.

**Required PPE:**

- **Safety Glasses, Gloves.Safety Shoes.**

**Ensure Delivery Driver is also wearing correct PPE before start of delivery.**

- Before starting the delivery, the earthing cable should be connected to lorry and then a sample must be taken of each solvent being delivered. These samples should be taken to the Production QC Lab. To take sample, the Driver will then dip the sample bottle into the tank. Wipe the sample bottle clean and write on it the name of solvent, supplier and date. (Different suppliers have different names for solvents; refer to Alternative Suppliers Trade Name List on notice board in Supply Office).
- Whilst samples are being tested ask the Driver to dip tanks with his dipping stick to ensure that the correct quantity is being delivered. Check that the tank is capable of accepting the delivery. This is done by checking the tank gauge for the correct storage tank.
- When samples have been cleared by Production QC. The pipes can then be connected to the storage tanks. The inlet pipes are numbered for ease of recognition and the name of the solvent in each tank is on the relevant gauge. The keys to unlock the inlet pipes are also numbered and have the solvent name on the key fob. Keys from Supply Area.
- When the hoses are being connected, check that they are connected to the correct inlet pipe, and the correct 'pot' on the tanker. The 'pots' on the tanker are numbered. The delivery note tells you what each 'pot' on the tanker contains. Once you are sure that the correct solvent will be delivered to correct storage tank.
- The delivery can now commence.
- Deliveries into the tank are pumped from the tanker. The Driver will open the valve on the tanker outlet and start the pump. Once delivery starts, check for leaks. If a leak occurs tighten connections. If persists stop delivery. (For major spill procedure refer to CIMA emergency procedure file). Drips should be caught in a bucket and retained for later disposal.
- The tanks are fitted with high level warning devices. If a warning sounds then shutdown the fill procedure immediately and refer to the Site Manager.
- When delivery has finished, the Driver will disconnect the hoses. Drain any residue into a bucket and dispose into the solvent waste IBC. Replace caps on end of inlet pipes. Lock off inlet pipe and return key to Supply Area.
- Complete the form of certificate for licensee Controlled Deliveries. Keep one copy of the Controlled Delivery form and give one to the Driver. Also retain a copy of the Delivery Note.
- Booking into stock refer to goods in procedure.

**End of Permit**