



Application for a Part B Permit

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

Introduction

When to use this form

This environmental permitting regime is known as and referred to as Local Authority Pollution Prevention and Control ('LAPPC'). Installations permitted under this regime are known as Part 'B' installations. Use this form if you are sending an application for a 'Part B' permit to a Local Authority under the Environmental Permitting (England and Wales) Regulations 2010 ("the EPR").

Before you start to fill in this form

You are strongly advised to read relevant parts of the Defra general guidance manual issued for LA-IPPC and LAPPC, republished in 2010 and available at:

<http://www.defra.gov.uk/environment/ppc/localauth/pubs/guidance/manuals.htm>.

This contains a list of other documents you may need to refer to when you are preparing your application, and explains some of the technical terms used. You will also need to read the relevant sector guidance note, BREF note or Process Guidance note as relevant. The EP Regulations can be obtained from The Office of Public Sector Information, or viewed on their website at <http://www.opsi.gov.uk/stat.htm>.

Which parts of the form to fill in

You should fill in as much of this form as possible. The appropriate fee must be enclosed with the application to enable it to be processed further. When complete return to: **Environment Services, Maldon District Council, Princes Road, Maldon, Essex CM9 5DL**

Other documents you may need to submit

There are number of other documents you may need to send us with your application. Each time a request for a document is made in the application form you will need to record a document reference number for the document or documents that you are submitting in the space provided on the form for this purpose. Please also mark the document(s) clearly with this reference number and the application reference number, if you have been given one, which will be at the top of the form overleaf. If you do not have either of these, please use the name of the installation.

Using continuation sheets

In the case of the questions on the application form itself, please use a continuation sheet if you need extra space; but please indicate clearly on the form that you have done so by stating a document reference number for that continuation sheet. Please also mark the continuation sheet itself clearly with the information referred to above.

Copies

Please send the original and 3 copies of the form and all other supporting material, to assist consultation. If you are submitting your application electronically, a single paper copy of the application must accompany your electronic data.

If you need help and advice

We have made the application form as straightforward as possible, but please get in touch with us at the local authority address given above if you need any advice on how to set out the information we need.

LAPPC Application Form: to be completed by the operator		
For Local Authority use		
Application Reference:	Officer Reference:	Date received:

A1.1 Name of the installation

A1.2 Please give the address of the site of the installation

Postcode

Telephone

Ordnance Survey national grid
reference 8 characters

T	L	9	0	0	1	1	3
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A1.3 Existing authorisations:

Please give details of any existing LAPPC or LA-IPPC authorisation for the installation, or any waste management licences or water discharge consents, including reference number(s) and type(s):

NIA

Please provide the information requested below about the "Operator", which means the person who it is proposed will have control over the installation in accordance with the permit (if granted)

A2.1 The Operator – Please provide the full name of company or corporate body

UNIVERSAL SERVICES

Trading/business name (if different)

Registered Office address

BECKINGHAM BUSINESS PARK,
TOLLESHUNT MAJOR, MALDON, ESSEX

Postcode: CM9 8LZ

Principal Office address (if different)

Postcode: _____

Company registration number

A2.2 Holding Companies

Is the operator a subsidiary of a holding company within the meaning of Section 1159 of the Companies Act 2006?

No

Yes name of ultimate holding company _____

Registered office address

Postcode _____

Principal Office address (if different)

Postcode _____

Company registration number: _____

A3.1 Who can we contact about your application?

It will help to have someone who we can contact directly with any questions about your application. The person you name should have the authority to act on behalf of the operator. This could be an agent or consultant rather than the operator.

Name JOHN ROYCE

Position GENERAL MANAGER

Address UNIVERSAL SERVICES, BECKINGHAM BUSINESS PARK,
TOLLESHUNT MAJOR Postcode CM9 8LZ

Telephone number 01621 868700

Fax number 01621 860697

E. Mail address john.royce@universalservicesuk.co.uk

B1.2 Why is the application being made?

- The installation is new.
- The installation is an existing installation that now requires a Permit.
- The installation is existing, but changes to the installation or to the EPR means that an LAPPC Part B permit is now required.

B.1.3 Site Maps

Please provide:-

* A suitable map showing the location of the installation clearly defining extent of the installations in red

Doc Reference

Attachment 2

* A suitable plan showing the layout of activities on the site, including bulk storage of materials, waste storage areas and any external emission points to atmosphere

Doc Reference

Attachment 3

B2 The Installation

Please provide written information about the aspects of your installation listed below. We need this information to determine whether you will operate the installation in a way in which all the environmental requirements of the EPR are met.

B2.1 Describe the proposed installation and activities and identify the foreseeable emissions to air from each stage of the process (this will include any foreseeable emissions during start up, shut down and any breakdown/abnormal operation)

The use of process flow diagrams may aid to simplify the operations

Doc Reference:

Attachment 4

B2.2 Once all foreseeable emissions have been identified in the proposed installation activities, each emission should be characterised (including odour) and quantified.

- atmospheric emissions should be categorised under the following
- (i) point source, (e.g. chimney / vent, identified by a number and detailed on a plan)
 - (ii) fugitive source (e.g. from stockpiles / storage areas).

If any monitoring has been undertaken please provide the details of emission concentrations and quantify in terms of mass emissions. If no monitoring has been undertaken please state this.

(Mass Emission - the quantification of an emission in terms of its physical mass per period of time. Eg. Grams per hour, tonnes per year)

B2.3 For each emission identified from the installations' activities describe the current and proposed technology and other techniques for preventing or, where that is not practicable reducing the emissions. If no techniques are currently used and the emission goes directly to the environment, without abatement or treatment this should be stated

Doc Reference: _____ Attachment **5**

B2.4 Describe the proposed systems to be used in the event of unintentional releases and their consequences. This must identify, assess and minimise the environmental risks and hazards, provide a risk-based assessment of any likely unintentional releases, including the use of historical evidence. If no assessments have been carried out please state.

Doc Reference: _____ Attachment **6**

B2.5 Describe the proposed measures for monitoring all identified emissions including any environmental monitoring, and the frequency, measurement methodology and evaluation procedure proposed. (e.g. particulate matter emissions, odour etc). Include the details of any monitoring which has been carried out which has not been requested in any other part of this application. If no monitoring is proposed for an emission please state the reason.

Doc Reference: _____ Attachment **7**

B2.6 Provide detailed procedures and policies of your proposed environmental management techniques, in relation to the installation activities described.

Doc Reference: _____ Attachment **8**

B3 Impact on the Environment

B3.1 Provide an assessment of the potential significant local environmental effects of the foreseeable emissions (for example, is there a history of complaints, is the installation in an air quality management area ?)

Doc Reference: _____ Attachment **9**

B3.2 Are there any sites of special scientific interest (SSSIs) or European Sites which are within either:

- 2 kilometres for an installation which includes Part B combustion, incineration (but not crematoria), iron and steel, and non-ferrous metal activities, or,
- 1 kilometre for Part B mineral activities and cement and lime activities, or,
- ½ a kilometre for all other Part B activities.

No

Yes *please give names of the sites:*

B3.3 Provide an assessment of whether the installation is likely to have a significant effect on such sites and, if it is, provide an assessment of the implications of the installation for that site, for the purposes of the Conservation (Natural Habitats etc) Regulations 1994 (see appendix 2 of Annex XVIII of the General Guidance Manual).

Doc Reference:

NIA

B4 Environmental Statements

B4.1 Has an environmental impact assessment been carried out under The Town and Country Planning (Environmental Impact Assessment)(England & Wales) Regulations 1999, or for any other reason with respect to the installation?

No **NOT REQUIRED**

Yes Please supply a copy of the environmental impact assessment and details of any decision made:

Doc Reference:

B5 Additional information

Please supply any additional information which you would like us to take account of in considering this application.

Doc Reference

PHOTO'S OF PLANT

Attachment 10

C1 Fees and Charges

The enclosed charging scheme leaflet gives details of how to calculate the application fee. Your application cannot be processed unless the application fee is correct and enclosed.

C1.1 Please state the amount enclosed as an application fee for this installation.

£ 1579.00 Cheques should be made payable to: **Maldon District Council**

We will confirm receipt of this fee when we write to you acknowledging your application.

C1.2 Please give any company purchase order number or other reference you wish to be used in relation to this fee.

C2 Annual charges

If we grant you a permit, you will be required to pay an annual subsistence charge, failure to do so will result in revocation of your permit and you will not be able to operate your installation.

C2.1 Please provide details of the address you wish invoices to be sent to and details of someone we may contact about fees and charges within your finance section.

JOHN ROYCE

Postcode: CM9 8LZ

Telephone: 01621 - 868700

C3 Commercial confidentiality

C3.1 Is there any information in the application that you wish to justify being kept from the public register on the grounds of commercial confidentiality?

No

Yes

Please provide full justification, considering the definition of commercial confidentiality within the PPC regulations.

Doc Reference _____

C3.2 Is there any information in the application that you believe should be kept from the public register on the grounds of national security ?

No

Yes

Do not write anything about this information on the form. Please provide full details on separate sheets, plus provide a copy of the application form to the Secretary of State for a Direction on the issue of National Security.

C4 Data Protection

The information you give will be used by the Local Authority to process your application. It will be placed on the relevant public register and used to monitor compliance with the permit conditions. We may also use and or disclose any of the information you give us in order to:

- consult with the public, public bodies and other organisations,
- carry out statistical analysis, research and development on environmental issues,
- provide public register information to enquirers,
- make sure you keep to the conditions of your permit and deal with any matters relating to your permit
- investigate possible breaches of environmental law and take any resulting action,
- prevent breaches of environmental law,
- offer you documents or services relating to environmental matters,
- respond to requests for information under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 (if the Data Protection Act allows),
- assess customer service satisfaction and improve our service.

We may pass on the information to agents/ representatives who we ask to do any of these things on our behalf. It is an offence under Regulation 38 of the EP Regulations, for the purpose of obtaining a permit (for yourself or anyone else) to:

- make a false statement which you know to be false or misleading in a material particular,
- recklessly make a statement which is false or misleading in a material particular.

If you make a false statement:

- we may prosecute you, and
- if you are convicted, you are liable to a fine or imprisonment (or both).

C5 Declaration: previous offences (delete whichever is not applicable)

I/We certify that:

EITHER

No offences have been committed in the previous five years which are relevant to my/our competence to operate this installation in accordance with the EP Regulations.

OR

The following offences have been committed in the previous five years which may be relevant to my/our competence to operating this installation in accordance with the Regulations:

Signature



Name

JOHN ROYCE

Position

GENERAL MANAGER

Date

7/7/10

UNIVERSAL SERVICES
DOCUMENT REVIEWED
[Signature]
AUTH SIGNATURE DATE 170806.

SAFETY DATA SHEET

Page 1 of 4

VAPOSOL UNI.

*g = arranged
j = unarranged*
REVISIONS BY DATE (WAS 2003/1)

Revision

0

Revision date

1. IDENTIFICATION OF THE SUBSTANCE / PREPARATION AND THE COMPANY

Product name VAPOSOL UNI. *Acetone concentrate min. now 3 (WAS 2.5)*

Company Stowlin Limited
Radnor Road
South Wigston
Leicester
LE18 4XY
United Kingdom

Telephone +44 (0)116 278 5373

Fax +44(0)116 277 2616

2. COMPOSITION / INFORMATION ON INGREDIENTS

Hazardous ingredients

	Conc.	CAS	EINECS	Symbols/Risk phrases
Acetone ✓	③ 10%	67-64-1	200-662-2	F; R11 Xi; R36 R66 R67
Dichloromethane ✓	90 - 100%	75-09-2	200-838-9	Carc Cat 3; R40
Ionic Surfactant and Solvent Stabilisers ✓	0 - 2.5%			

3. HAZARDS IDENTIFICATION

Main hazards Limited evidence of a carcinogenic effect. ✓

Other hazards Irritating to eyes and skin. ✓

4. FIRST AID MEASURES

Skin contact May cause irritation to skin. May cause dermatitis. Wash off immediately with plenty of soap and water. Remove contaminated clothing. Seek medical attention if irritation or symptoms persist.

Eye contact May cause irritation to eyes. Rinse immediately with plenty of water for 15 minutes holding the eyelids open. Seek medical attention if irritation or symptoms persist.

Inhalation Harmful by inhalation. Inhalation may cause nausea and vomiting. May cause dizziness and headache. Move the exposed person to fresh air. Seek medical attention.

Ingestion Harmful if swallowed. Ingestion may cause nausea and vomiting. Ingestion is irritating to the respiratory tract and may cause damage to the central nervous system. DO NOT INDUCE VOMITING. If swallowed, seek medical advice immediately and show this container or label.

5. FIRE FIGHTING MEASURES

Extinguishing media Use as appropriate: carbon dioxide (CO₂), dry chemical, foam.

Fire hazards Burning produces irritating, toxic and obnoxious fumes.

Protective equipment Self-contained breathing apparatus. Wear protective clothing.

VAPOSOL UNI.

Revision 0
Revision date**6. ACCIDENTAL RELEASE MEASURES**

Personal precautions	Ensure adequate ventilation of the working area. Wear suitable protective equipment.
Environmental precautions	Do not allow product to enter drains. Prevent further spillage if safe.
Clean up methods	Absorb with inert, absorbent material. Transfer to suitable, labelled containers for disposal. Clean spillage area thoroughly with plenty of water.

7. HANDLING AND STORAGE

Handling	Avoid contact with eyes and skin. Ensure adequate ventilation of the working area. Adopt best Manual Handling considerations when handling, carrying and dispensing.
Storage	Keep in a cool, dry, well ventilated area. Keep containers tightly closed.

8. EXPOSURE CONTROLS / PERSONAL PROTECTION**Exposure limits**

Acetone	WEL 8-hr limit ppm: 500 WEL 15 min limit ppm: 1500	WEL 8-hr limit mg/m3: 1210 WEL 15 min limit mg/m3: 3620
Dichloromethane	WEL 8-hr limit ppm: 100 WEL 15 min limit ppm: 300	WEL 8-hr limit mg/m3: 350 WEL 15 min limit mg/m3: 1080

Engineering measures	Ensure adequate ventilation of the working area.
Respiratory protection	Self-contained breathing apparatus. Wear protective clothing.
Hand protection	Chemical resistant gloves (PVC)
Eye protection	Approved safety goggles.
Protective equipment	Wear chemical protective clothing.

9. PHYSICAL AND CHEMICAL PROPERTIES

Description	Liquid. ✓
Colour	Clear. ✓
Odour	Mild. ✓
pH	N/A ✓
Boiling point	42°C ✓
Vapour pressure	385mm Hg @ 20°C ✓
Relative density	1.3 - 1.32 g/ml @ 20°C ✓
Water solubility	slightly soluble in water. ✓
Autoignition temperature	550°C ✓

10. STABILITY AND REACTIVITY

Stability	Stable under normal conditions. ✓
Conditions to avoid	Heat, sparks and open flames. Light. Moisture. ✓
Materials to avoid	Alkali metals. Caustics. Finely powdered metals. Oxidising agents. Strong bases. ✓
Hazardous decomposition products	Carbon oxides. Hydrogen chloride. Phosgene. ✓

VAPOSOL UNI.

Revision 0
Revision date**11. TOXICOLOGICAL INFORMATION**

Acute toxicity	Headache, nausea and vomiting. In severe cases, may cause loss of consciousness. Ingestion is irritating to the respiratory tract and may cause damage to the central nervous system. Inhalation is irritating to the respiratory tract and may cause damage to the central nervous system.
Corrosivity	Irritating to eyes and skin. May cause degreasing of the skin. May cause dermatitis.
Sensitization	The substance has not been tested at all for this end point, so its hazardous property in this regard is not known.
Repeated or prolonged exposure	Repeated or prolonged exposure may cause damage to liver, kidneys and central nervous system.
Mutagenic effects	No mutagenic effects reported.
Reproductive toxicity	No embryo-fetotoxicity at non-toxic maternal doses (Rat/inhalation)

12. ECOLOGICAL INFORMATION

Ecotoxicity	Toxicity to aquatic life is expected to be low.
Mobility	Rapid evaporation.
Bioaccumulation	Does not bioaccumulate.

13. DISPOSAL CONSIDERATIONS

General information	Dispose of in compliance with all local and national regulations.
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14. TRANSPORT INFORMATION

ADR/RID

UN 2810	Packing group III
Class 6.1	Hazard ID 60
Proper Shipping Name N.O.S.	TOXIC LIQUID, ORGANIC,

IMDG

UN 2810	Packing group III
Class 6.1	Marine pollutant
EmS Code F-A S-A	

IATA

UN 2810	Packing group III
Class 6.1	Subsidiary risk -
Packing Instruction 618 (Cargo)	Maximum quantity 220 L
Packing Instruction 611 (Passenger)	Maximum quantity 60 L

15. REGULATORY INFORMATION

Labelling The product is classified in accordance with 67/548/EEC.

Symbols Xn - Harmful



Risk phrases R40 - Limited evidence of a carcinogenic effect.

Safety phrases S9 - Keep container in a well-ventilated place.
S16 - Keep away from sources of ignition - No smoking.
S23 - Do not breathe gas/fumes/vapour/spray.
S24/25 - Avoid contact with skin and eyes.
S36/37 - Wear suitable protective clothing and gloves.

VAPOSOL UNI.Revision 0
Revision date**16. OTHER INFORMATION****Text of risk phrases in
Section 2**

R11 - Highly flammable.
R36 - Irritating to eyes.
R40 - Limited evidence of a carcinogenic effect.
R66 - Repeated exposure may cause skin dryness or cracking.
R67 - Vapours may cause drowsiness and dizziness.

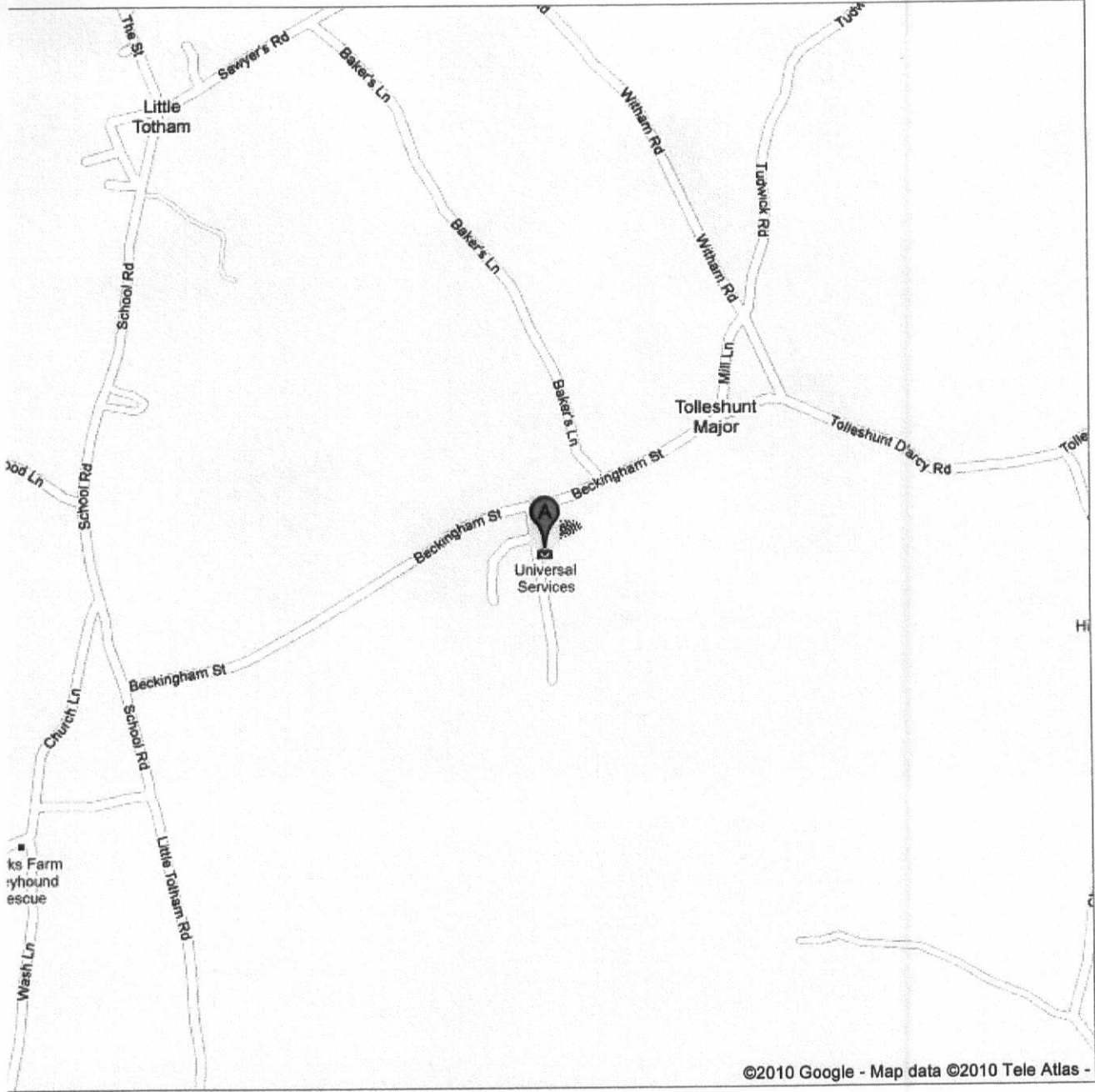
Further information

The information supplied in this Safety Data Sheet is designed only as guidance for the safe use, storage and handling of the product. This information is correct to the best of our knowledge and belief at the date of publication however no guarantee is made to its accuracy. This information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any other process.

Google maps
UK

Address Maldon, Essex CM98LZ
UK

Attachment 2



©2010 Google - Map data ©2010 Tele Atlas -

B2 The Installation

B2.1 The installation, activities and foreseeable emissionsThe Installation and Activities

Universal services produce high quality institutional sports equipment using metal and timber.

Metal:

Raw metal is machined to size and welded to form components

Metal components are degreased in preparation for powder coating

Metal components are powder coated

Components are assembled and wrapped for dispatch

INPUTS	USE	OUTPUTS
Solvent in →	Solvent stored	
	↓	
	Tank filled →	Empty or part full drums stored
	↓	
Metal work in	Metal cleaned	Clean metal out
	↓	
	Tank emptied of dirty solvent	Waste solvent disposal

Foreseeable emissions to air from each stage of the process

Foreseeable emissions to air from each stage of the process are detailed below. The table includes for all foreseeable emissions during start up, shut down and break down and identifies the foreseeable emissions at each stage of the process.

ACTIVITIES	FORESEEABLE EMISSIONS
Receipt of Solvent	Solvent emission
Storage of Solvent	Solvent emission
Filling tank with Solvent	Solvent emission
Solvent on materials	Solvent emission
Solvent on basket	Solvent emission
Solvent escaping from open tank	Solvent emission
During emptying of tank	Solvent emission
Leaking from tank	Solvent emission
Solvent going up stack	Solvent emission
Metal work in	None
Clean metal out	None

B2.2 Characterisation and quantification of emissions

Characterisation of emissions

The activities and their relative foreseeable emissions to air detailed above are characterised as either point source emissions or fugitive emissions in tables below.

<u>Foreseeable point source emissions to air</u>
Solvent emission to air through stack

<u>Foreseeable fugitive emissions to air</u>
Receipt of Solvent
Storage of Solvent
Filling tank with Solvent
Solvent on materials
Solvent on basket
Solvent escaping from open tank
During emptying of tank
Leaking from tank

Quantifications of emissions

At this stage no emission monitoring has been carried out we are in the process of trying to arrange this. There are no visible signs of solvent vapour rising above lowest set of cooling pipes in tank. There are no signs of vapour release and we have had no complaints to our knowledge of vapour smells.

<u>Foreseeable emissions</u>	<u>Expected emissions</u>
Receipt of Solvent	No emission
Storage of Solvent	No emission
Filling tank with Solvent	No emission
Solvent on materials	No visible emission
Solvent on basket	No visible emission
Solvent escaping from open tank	No visible emission
During emptying of tank	No emission
Leaking from tank	No emission
Solvent going up stack	No visible emission

B2.3 Current Technology and other Techniques

Receipt of Solvent

Solvent is delivered in drums secured to pallets these are transported by pallet truck or fork lift

Storage of Solvent

Solvent is stored in a locked steel cabinet with suitable drip tray to contain any leaks. Cabinet is located in a open air area safe from collision by vehicular movement.

Filling Tank

Tank is filled by means of a pump that attaches to drum and a pipe going directly into tank. This pipe is to be extended to bottom of tank well below condensing coils.

Solvent on materials, Solvent on basket, Solvent escaping from open tank

As soon as the vapour reaches the condensing coils, the plant is ready for operation. The work to be cleaned is lowered into the tank in the baskets to rest on the floor plates the basket is manufactured solid bars with no tubing to avoid trapping solvent.

The raise and lower speeds do not exceed 3 metres per minute to avoid forcing vapour out of the tank.

Closed end articles are loaded so that the solvent can drain.

Remote controlled shutters are closed during degreasing process and only opened for removing or loading of materials.

When a large amount of work is loaded into the plant it absorbs the heat in the vapour and reduce the vapour level. As the vapour level is restored, it will be seen to condense onto and run off the workload. Once the vapour level has returned to the coils and condensation on the work has ceased (meaning that the work is at vapour temperature) it can be removed from the plant.

During withdrawal, the workload is held in the freeboard zone - that is between the coils and the rim, to allow for drainage and any excess vapour to be drawn off by the fan.

Regular checks are made of the solvent level to make sure that it does not fall too low.

A solvent level device is mounted in the sump of the plant to monitor the solvent level.

Should the solvent fall below the predetermined level, the heating will be automatically switched off and the LOW SOLVENT lamp will illuminate. This device is not be used as an indication of when to add solvent. The level is visually checked daily and topped up as required when cold.

Solvent is not added when the plant is hot.

Contaminated materials are not put in the tank.

During emptying of tank

The tank is equipped to remove clean chemicals. Our contract with Stowlin Croftshaw our solvent supplier gives use on site assistance advice during removal of old contaminated solvent and this is returned to the for processing.

Leaking from tank

The tank has maintained yearly and is checked internally on a regular basis.

Floor area in vicinity of tank to be painted in solvent resistant paint.

Solvent going up stack

Height of stack from floor level is 10.5m there is 2m above roof level

Extraction is independently checked yearly.

B2.4 Unintentional releases

The combination of plant design, emissions monitoring, regular external inspections, internal inspections and operating procedures. Will ensure the risk of unforeseen or uncontrolled emission remains as low as possible.

See document D_04_2 attached

This D_04 has been temporarily modified to accommodate an outline environmental assessment of Universal Services premises

ISSUE STATUS	ISSUE DATE	NATURE OF CHANGE
1	11-09-03	First issue following environmental checklist completed on 29/08/03.
2	14/06/2010	Updated.

Attachment 6

Severity (SEV)	Probable Frequency (Occ)
1	Improbable occurrence
2	Possible occurrence
3	Occasional occurrence
4	Frequent occurrence
5	Regular occurrence
6	Common occurrence

Action on Risk Priority Numbers (RPN's)
Up to and including 2
Greater than 2

ITEM & LOCATION	POTENTIAL HAZARD(S)/ CONDITION	EFFECT ON ENVIRONMENT	S E V	P O T E N T I A L / A C T U A L C A U S E(S)	K N O W N C U R R E N T C O N T R O L S	R E C O M M E N D E D A C T I O N S
1) Purchase	Various impacts from supplier of plating process	Unknown	-	Ineffective/no supplier controls	Environmental Management details received from supplier of plating process.	None
2) Assembly & Despatch	Water course contaminated with degreaser solvent	Toxic drinking water affecting health of animals and humans and condition of plant life	6	Solvent soaked through floor in vicinity of degreasing plant, into watercourse via subsoil	None at 11/09/03 and 14/06/2010.	Seal floor with solvent-resistant coating in relevant vicinity of coating plant
3) Assembly & Despatch	Drains contaminated with paint by-products	Toxic drinking water affecting health of animals and condition of plant life	4	Waste water and sludge from wet spray booth poured into drains	Drained water and sludge put into containers for removal by specialist contractor (rubbish skip)	None

B2.5 Emission monitoring

The table below details the nature of foreseeable emissions, type of monitoring and the frequency.

Receipt of Solvent	Visual assessment	At time of deliveries
Storage of Solvent	Visual assessment	Weekly
Filling tank with Solvent	Visual assessment	At time of filling
Solvent on materials	Visual assessment	During use
Solvent on basket	Visual assessment	During use
Solvent escaping from open tank	Visual assessment solvent level Visual inspection shutters Check for odours Air sampling	At least daily At least daily At least daily As required
During emptying of tank	Visual assessment	At time of emptying
Leaking from tank	Visual assessment	Weekly
Solvent going up stack	Check for odours Air sampling	Weekly As required

Air sampling was last carried out 31st October 2007 by Stowlin Croftshaw we have arranged for this to be carried out again shortly.

B2.6 Environmental management techniques

All operators are trained to use of the plant and operation instructions are displayed by the plant. See attached.

Plant is independently inspected and certified yearly by Allianz Engineering in conjunction with our insurers.

Plant is independently serviced by IP&PS yearly.

During tank emptying we have on site support from Stowlin Croftshaw chemical provider.

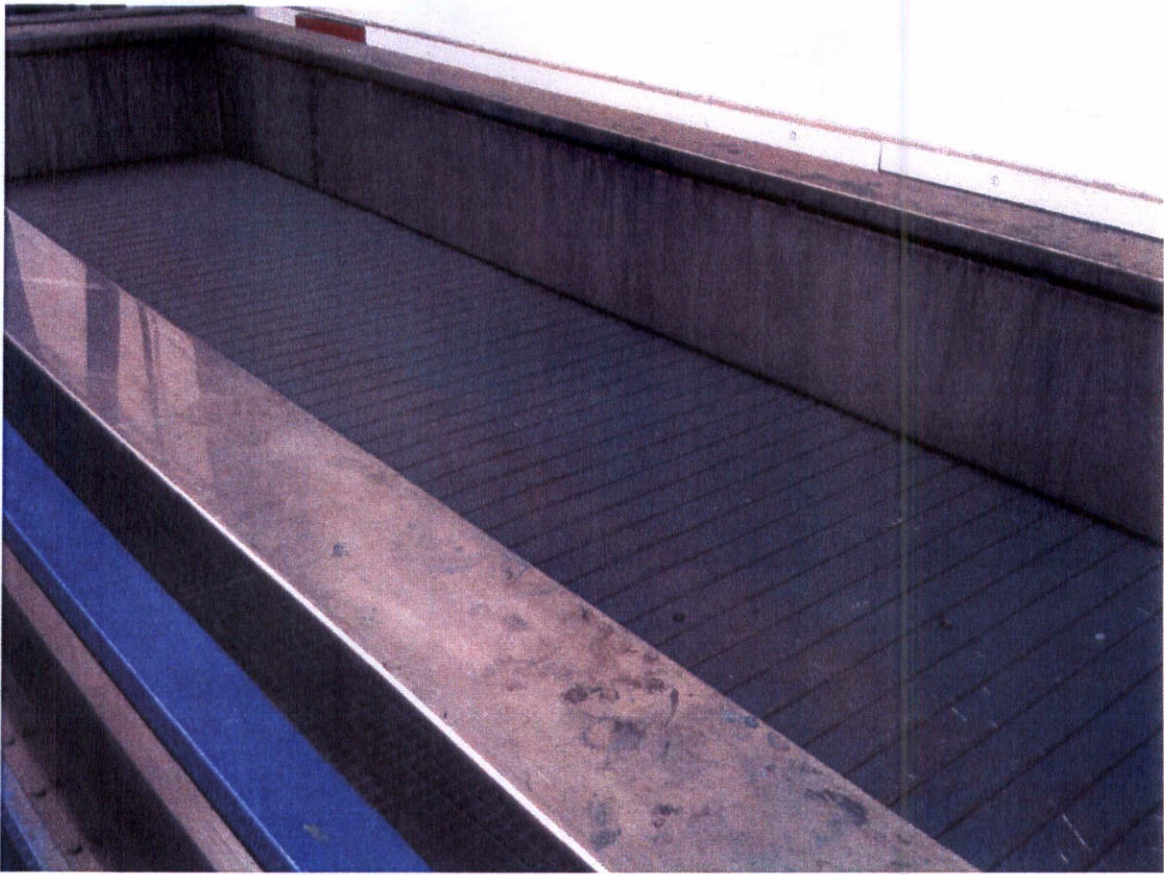
OPERATING THE DEGREASER PLANT

- As soon as the vapour reaches the condensing coils, the plant is ready for operation. The work to be cleaned is lowered into the tank in the baskets to rest on the floor plates.
- The raise and lower speeds must not exceed 3 metres per minute to avoid forcing vapour out of the tank.
- Closed end articles should be loaded so that the solvent can drain.
- When a large amount of work is loaded into the plant it will absorb the heat in the vapour and reduce the vapour level. As the vapour level is restored, it will be seen to condense onto and run off the workload. Once the vapour level has returned to the coils and condensation on the work has ceased (meaning that the work is at vapour temperature) it can be removed from the plant.
- During withdrawal, the workload should be held in the freeboard zone - that is between the coils and the rim, to allow for drainage and any excess vapour to be drawn off by the fan.
- Careless loading and unloading subjects the operative to high concentrations of solvent vapour, and uses excessive quantities of it. Regular checks should be made of the solvent level to make sure that it does not fall too low.
- A solvent level device is mounted in the sump of the plant to monitor the solvent level. Should the solvent fall below this device, the heating will be automatically switched off and the LOW SOLVENT lamp will illuminate. This device should not be used as an indication of when to add solvent. The level should be visually checked daily and topped up as required when cold.
- Do not add solvent when the plant is hot.
- Do not clean materials that have previously been in paint stripper.

B3.1 Impact on the Environment

We have had no complaints from local residents or company staff in relation to odour from the tank.

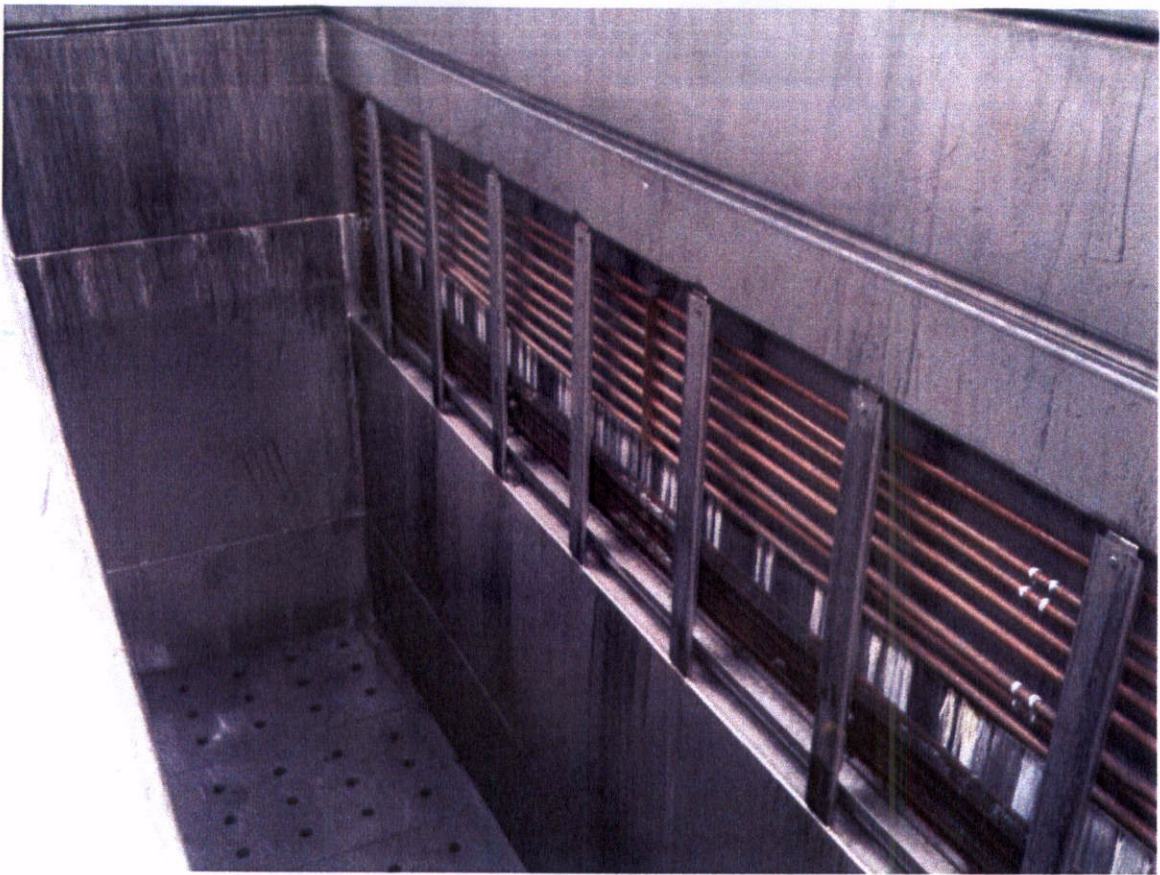
We would consider this plant a low insignificant risk to the environment.



Degreasing plant with shutters closed and top lip extraction.



Degreasing plant with automatic shutters opening.



Condensing coils and vapour clearly maintained below this point.



Solid steel basket with no tubing.