



# **Decision Document**

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

***Decision: Permit application***

***Universal Services  
Beckingham Business Park  
Tolleshunt Major  
Maldon  
Essex  
CM9 8LZ***

**Date of decision:      *8<sup>th</sup> April 2011***

***ehrc.org.uk***

**Environmental Health Resource Centre Limited, 13 Oak Lodge, Eversley Park Road, London N21 1JL  
tel. 07802 349 581      fax. 0871 6611321      email. [info@ehrc.org.uk](mailto:info@ehrc.org.uk)      web. [www.ehrc.org.uk](http://www.ehrc.org.uk)**

## 1. Application

Standard part B application form was received along with maps and a separate supplementary information document.

- The form was signed
- The correct fee was paid
- Information received was not of sufficient detail to assess the application, because the emissions monitoring undertaken was not considered to be adequate.

**Decision:** Further information requested on 9<sup>th</sup> August 2010 as follows:

- Details of Operator (i.e. partnership, Ltd Co. etc)
- Stack emissions monitoring in accordance with PG6/45.

The additional information requested was received on 1<sup>st</sup> December 2010 and was considered adequate to progress with the permitting process.

**Decision:** Application 'duly made'.

## 2. Guidance

The relevant statutory guidance is:

- Secretary of State's Guidance for Local Air Pollution Control Process Guidance Note 6/45(04) and draft process guidance note 6/45(10) Surface Cleaning.
- No other statutory guidance is applicable.
- No other relevant guidance need be considered.

**Decision:** Use Secretary of State's Guidance for Local Air Pollution Control Process Guidance Note 6/45(04) and draft process guidance note 6/45(10) Surface Cleaning in the determination of the application.

## 3. Consultation

The relevant national consultees are the Mix Essex Primary Care Trust.

Public consultees were made aware of the application by means of local notice displayed outside the installation.

Mid Essex Primary Care Trust did not provide a consultation response.

**Decision:** Site-specific conditions derived from EPR2010 and Guidance Note 6/45(04) and draft process guidance note 6/45(10) Surface Cleaning will represent BAT.

#### 4. Draft Permit

A bespoke permit was produced in the Maldon permit style. All conditions were derived from guidance note 6/45(04) and draft process guidance note 6/45(10) 'Surface Cleaning'. Specific decisions made in relation to conditions used in the permit are as follows:

Condition	Narrative
1.1.1	Description of permitted activities and directly associated activities.
1.1.2	Requirement for Operator to notify the Regulator on proposed changes.
1.1.3	Definitions of substantial change from PG6/45 SED Box 3.
1.1.4	New definitions relating to certain Hazard Phrase Materials.
1.1.5	New definitions relating to certain Hazard Phrase Materials.
1.2.1	Description of the installation and activities undertaken.
1.2.2	Description of plant and equipment comprising the installation.
1.2.3	Specification of emission release points.
1.2.4	Specification for emission release points.
1.2.5	Specification of emission release points.
1.3.1	Improvement plan timetable: <ul style="list-style-type: none"><li>12 calendar months from the date of permit issued for compliance with emission limits.</li></ul>
1.3.2	Compliance notification condition.
1.3.3	Alternative compliance notification condition.
2.1.1	Requirement to operate the installation/activity in accordance with the permit application.
2.1.2	Residual BAT condition as recommended by defra General Guidance Manual.
2.2.1	Emission limits from PG6/45 SED Box 5 & SED Box 7.
2.2.2	Derived from paragraph 4.16 PG6/45.
2.2.3	Derived from PG6/45.
2.2.4	Derived from PG6/45 and modified for clarity of requirements.
2.2.5	Derived from PG6/45 and modified for clarity of requirements.
2.2.6	Derived from PG6/45 and modified for clarity of requirements.
2.2.7	From paragraph 4.14 PG6/45.
2.2.8	From paragraph 4.24 PG6/45.
2.2.9	From paragraph 4.25 PG6/45.
2.2.10	Bespoke condition to ensure representative monitoring.
2.2.11	From paragraph 4.33 PG6/45.
2.2.12	From paragraph 4.32 PG6/45.

Condition	Narrative
2.2.13	From paragraph 4.18 PG6/45.
2.2.14	From SED Box 8 PG6/45.
2.2.15	From paragraph 4.14 PG6/45.
2.3.1	From SED Box 7 PG6/45.
2.3.2	Bespoke condition requiring degreasing machines to be upgraded or replaced where the emission limit is not met. Shortest possible time detailed by improvement plan in condition 1.3.1.
2.3.3	Bespoke condition to reference relevant emission limits and compliance monitoring.
2.3.4	From paragraph 5.6 PG6/45.
2.3.5	Bespoke condition to cover materials that become designated risk phrase materials after the permit has been issued.
2.3.6	From SED Box 7 & paragraph 5.7 PG6/45.
2.3.7	Bespoke condition to prohibit and therefore minimise losses from bulk storage of VOC.
2.3.8	From paragraph 5.4 PG6/45.
2.3.9	From paragraph 5.8 PG6/45.
2.3.10	From paragraph 5.6 PG6/45.
2.3.11	From paragraph 5.7 PG6/45.
2.3.12	From paragraph 5.7 PG6/45.
2.3.13	From paragraph 5.7 PG6/45.
2.3.14	From paragraph 5.7 PG6/45.
2.3.15	From paragraph 5.7 PG6/45.
2.3.16	From paragraph 5.7 PG6/45.
2.3.17	From paragraph 5.8 PG6/45.
2.3.18	From paragraph 5.8 PG6/45.
2.3.19	From paragraph 5.8 PG6/45.
2.3.20	From paragraph 5.8 PG6/45.
2.3.21	From paragraph 5.8 PG6/45.
2.3.22	From paragraph 5.8 PG6/45.
2.3.23	From paragraph 5.11 PG6/45.
2.3.24	From paragraph 5.11 PG6/45.

Condition	Narrative
2.3.25	From paragraph 5.11 PG6/45.
2.4.1	From paragraph 5.17 & 5.18 PG6/45.
2.5.1	From paragraph 5.19 PG6/45.
3	Record keeping conditions common to all permits.
4	Reporting conditions common to all permits.
5	Notification conditions common to all permits.
6	Explanatory notes common to all permits.

## 5. Decision – draft permit

It is considered that modifications to the plant are unlikely to deliver compliance with the emission limit, however the Operator will be given the opportunity to try and demonstrate compliance within 12-months of the date of granting the permit, and to replace the equipment within 12-months of the date of granting the permit if compliance with the emission limit cannot be demonstrated.

The outcome of the permit application process has resulted in the decision to **grant** the permit for Universal services. A draft permit was issued to the Operator on 13<sup>th</sup> February 2011.

## 6. Inspection

The permitting inspection was undertaken on 25<sup>th</sup> February 2011 in the presence of John Royce and Colin Rhodes from Universal Services, Fay Rushby (EHRC) and Shirley Hall (Maldon Council).

The installation was as described in the permit application.

The following points were specifically discussed:

- Emissions monitoring results  
Results indicate the activity does not comply with the emission limit concentration.  
Results indicate the activity does not comply with the fugitive emission limit.
- Timetable for demonstrating compliance with existing equipment  
Modifications to the degreasing tank are proposed, and should be completed in April/May 2011  
A full 12-months is needed to demonstrate compliance following the modifications.
- Timetable for demonstrating compliance with replacement equipment  
To demonstrate compliance with the emission limit within 18-months of the date of granting the permit.  
To replace the degreasing equipment within 24-months of the date of granting the permit where compliance with the emission limit cannot be demonstrated.

- Procedures, instruction and training  
Procedures and record sheets were discussed, and examples were subsequently provided.  
Training should include awareness of the environmental permit and permit conditions.

## 7. Final permit

Minor permit amendments were made following the inspection process, these being:

Condition	Narrative
1.3.1	Improvement plan timetable: <ul style="list-style-type: none"><li>▪ 18 calendar months from the date of permit issued for compliance with emission limits.</li><li>▪ 24 calendar months from the date of permit issued to replace equipment where compliance with emission limits cannot be demonstrated.</li></ul>