



**Pollution Prevention and Control Act 1999
Local Authority Pollution Prevention and Control
The Environmental Permitting Regulations 2016**

**Automotive Cleaning Chemicals Ltd
4 Hadenham Road
Gisleham
Lowestoft
Suffolk
NR33 7NF**

REF – 08/00018/B/V2

**Section One
Introductory Note
&
Description of Permitted
Installation**

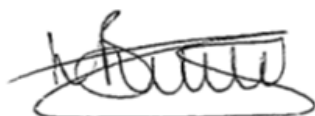
Permit Details

REF – 08/00018/B/V2

Permit Holder: Automotive Cleaning Chemicals Ltd. (A)	
Installation Address:	4 Hadenham Road (B) Gisleham Lowestoft Suffolk NR33 7NF
Registered Address of Company:	Automotive Cleaning Chemicals Ltd Amber House Showground Road Bridgewater Somerset TA6 4AJ

Provenance	Date
Application for Permit	1 December 2004
Permit Issued	8 February 2008
Permit Reviewed	8 February 2008
Permit Reviewed	15 June 2021
Permit Varied	15 June 2021
Permit Varied	7 June 2022

Automotive Cleaning Chemicals Ltd. is hereby permitted by East Suffolk Council to carry on the process of Manufacture of Coating Materials, as prescribed in Part B of Schedule 1, The Environmental Permitting Regulations 2016 at the above installation as indicated on the attached map at reference 652968E,289524N and in accordance with the conditions detailed in Section 2 of this Permit.



Signed 7 June 2022
Environmental Health Officer

Introductory Note

[This introductory note does not form a part of the Permit]

The following Permit is issued under the Environmental Permitting (England and Wales) Regulations 2016 to operate an installation carrying out activities covered by the descriptions contained in the Regulations, to the extent authorised by the Permit:

Aspects of the operation of the installation which are not regulated by conditions of the Permit are subject to the Operator using the best available techniques for preventing or, where that is not practicable, reducing emissions from the installation.

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

The Permit Conditions require the Operator to use Best Available Techniques (BAT), in each of the aspects of the management of the installation, to prevent and where that is not practicable to reduce emissions. The Conditions do not provide a definitive explanation of 'BAT'; In determining 'BAT', the Operator should pay particular attention to relevant sections of the Process Guidance Note PG6/44, and other relevant guidance.

Process Description

The process consists of the manufacture and packaging of cleaning materials for the automotive industry. Such products include detergents for bodywork, wheels and engine bays through to polishes and plastic trim protectors. The products are sold to the trade and commercial valeting companies. It is a defined Solvent Emissions Directive activity.

- Bulk Storage

The products manufactured can consist of either solvent based or water based cleaning products. Powder products are also added to manufacture products such as polishes or paint cutting compounds.

Solvents are delivered to the site by bulk road tanker. The different types of solvents are stored in six bulk storage tanks at the installation. The solvents used in the process are White Spirit, Odourless Kerosene, Isopropanol, Heptane and Xylene. The tanks are fitted with level indicators which are maintained and calibrated on an annual maintenance contract. The tanks are sited in a bund which can contain 30,000 litres, greater than the volume of the largest capacity tank. The tanks are fitted with a pressure and vacuum release valve on the roof.

The road tanker connection points are always kept locked and delivery can only take place in the presence of a component person from ACC Ltd to check the delivery quantities and the correct tank to be discharged to.

- Manufacture of Products

Metered solvents from the bulk storage tanks are pumped through steel pipes to the mixing vessels located in the main production building. Powdered materials are added by hand to the top of the mixing vessel. The powdered materials such as fillers and oxides are stored in 20kg bags. The product is mixed in the vessel for approximately 20 to 30 minutes before it is then discharged to semi pneumatic filling machines which can fill a variety of different closed container types in accordance with the customer's requirements.

The mixing vessels are kept lidded when mixing takes place. The number of full mixes a day can vary from between 2 to 6 each day. The mixing times in total may vary from between 1 to 5 hours.

- Potential releases from Atmosphere

The potential sources for release of pollutants to atmosphere are relatively small due to the short mixing time and the mixing vessels being lidded. There is no direct extraction to atmosphere from over the top of the mixing vessels to the outside of the building for most of the vessels on the installation. Two new vessels have been fitted with hood extraction for use when the vessel is being loaded, before the lid is closed into place. This is only running for a very short period and again does not have a significant impact on emissions to atmosphere from the process.

Section Two

Permit Conditions

Pollution Prevention and Control Act 1999

The Environmental Permitting (England and Wales) Regulations 2016

Permit Reference No. 08/00018/B

The conditions contained within this Permit are based upon Guidance Note/s: **PG6_44 - Manufacture of Coating Materials**

Emission Limits, Controls and Monitoring

1. All emissions to air, other than steam or water vapour shall be colourless, free from visible mist and free from visible fume and droplets.
2. All emissions shall be free from offensive odour outside the installation boundary as indicated in red on the attached plan PPC/18/Plan. This will be monitored daily downwind of the installation boundary.
3. If offensive odour emissions are detected, immediate action shall be taken to determine the cause of the emission and to resolve the malfunction responsible for the emission. Contingency arrangements shall be instigated to prevent or reduce to a minimum, any further odour emissions caused by the malfunction. The regulator shall be notified of any such occurrence as soon as practicable.

Solvent Emissions Directive

4. The following Total Emission Limit Value shall apply to VOC releases from the installation as Permitted in SE Box 6 of the guidance.

Throughput of Solvent used	Total Emission Limit Value
Organic solvent consumption of 100 tonnes or more and less than 1000 tonnes	5% of organic solvent input
Organic solvent consumption of 1000 tonnes or more.	3% of organic solvent input

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 PLUS the fugitive releases.

Total emission = O1 + 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 plant

Organic solvent input (I) - I1 + I2

Compliance with the total emission limit value is achieved if:

Total emission X 100
Organic solvent input

is equal to or < the total emission limit value

5. An inventory of organic solvent consumption, the total mass of organic solvent Inputs minus any solvents sent for reuse/recovery off-site shall be kept and forwarded to East Suffolk Council annually. The inventory shall be in the form of a mass balance in order to determine the Annual actual consumption of organic solvent (C).

(Appendix 1 details definitions for the calculation below).

Where: C = I1 - O8

I1 is the total quantity of organic solvents, or their quantity in preparations purchased which are used as input into the process/activity.

O8 is the organic solvents contained in mixtures recovered for reuse but not as input into the process/activity.

A calculation of the purchased organic solvent Input (I1) to the process/activity, is carried out by recording:

- The mass of organic solvent contained in raw materials and preparations in the initial stock (IS) at the start of the accounting period; plus
- The mass of organic solvent contained in raw materials and preparations in the purchased stock (PS) during the accounting period.
- 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 (I1) = IS + PS - FS

6. The operator shall identify:-

- Products or materials which are VOC's and are designated risk phrase R45, R46, R49, R60 and R61 (from 1st June 2015 hazard statement H340, H350, H350i, H360D or H360F) and
- Products or materials that are/contain Halogenated VOCs with the risk phrase R40 and R68 (from 1st June 2015 hazard statement H341 and H351)

and implement a timetable to replace, control and limit these designated risk phrase/ hazard statement materials as soon as possible, as agreed by the Environmental Protection Team at East Suffolk Council.

Monitoring, Sampling and Measurement of Emissions

7. A solvent management plan shall be used to demonstrate the Total Emission Limit Value as required by condition 4. The plan shall detail the consumption, actual solvent emission, fugitive emission and total emission by using a method such as the British Coatings Federation VOC workbook. The solvent management plan shall be submitted to East Suffolk Council every twelve months.

Operational Controls

8. All potentially odorous waste materials shall be stored in suitable closed containers or bulk storage vessels.
9. The bulk solvent storage tanks shall only be refilled under constant supervision by suitably trained personnel. The tanks, where practicable (as detailed in PG6/44) shall be back vented to the delivery tank during filling.
10. Delivery connections to bulk storage tanks shall be located within the bunded area marked "unloading equipment / area" on the attached plan and shall be locked when not in use.
11. All **new** VOC bulk storage tanks shall be fitted with a pressure vacuum relief (PVR) valve. The tank shall only vent to atmosphere in the event of the pressure in the headspace of the tank exceeding 20 mbarg. In case of a failure of the PVR valve, the tank shall be fitted with a bursting disk and flame trap that shall only operate in the event of an emergency, where the pressure in the headspace exceeds 0.1 barg.
12. In the event of such an emergency the operator shall notify the Environmental Protection Team at East Suffolk Council immediately and shall take the necessary remedial action. The incident, including the remedial action taken shall be recorded in the site logbook.
13. The exterior of all external bulk storage tanks shall be light coloured were possible to reduce the solar absorbency.
14. All process vessels shall be fully closed where practicable when blending / mixing to minimise VOC emissions, the exception being when charging, or sampling when the vessel portholes are opened.
16. Emissions from the emptying of mixing vessels and transfer of materials shall where practicable be contained using closed transfer systems.
17. All other solvents shall be stored on site in sealed drums, within the site's flammable material storage and cold storage areas.
18. All organic solvents used in the process shall be delivered to the batch mixing area either by direct delivery or transfer in sealed drums using fork-lift trucks.

19. During the cleaning of all mixing vessels with organic solvents the vessels shall where practicable remain closed and shall not be extracted to atmosphere (clean in place system).
20. Cleaning operations involving organic solvents shall be reviewed at least one every two years, to identify opportunities for reducing volatile organic compound emissions.
21. The amount of residual organic solvent bearing material left in drums and other containers shall be minimised. Prior to disposal, empty containers and drums that have contained organic solvents shall be closed to minimise emissions. All drums shall be stored in a suitable bunded area.
22. Suitable organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas.
23. Any spillage of solvent from drums or direct line delivery shall be cleaned up as soon as practicable utilising absorbent granules and cleaning equipment. Any leakage from delivery lines shall be repaired as soon as possible.
24. The results of all inspections, tests, periodic monitoring and maintenance shall be recorded and retained by the operator for a minimum of 2 years and made available for examination by the Environmental Protection Team at East Suffolk Council. Adverse results shall be investigated immediately and, in all cases, shall be recorded. The operator shall ensure that the cause of such adverse results has been identified and corrective action taken, and this action recorded.

General Operations

25. The permitted installation shall consist only of that plant and equipment stated in the process description as detailed in Section One of this Permit. No other plant or equipment shall be used without the prior written notification/consent of the regulator.
26. Regular cleaning and effective preventative maintenance in accordance with the manufacturer's instructions shall be employed on all plant and equipment concerned with the emission, capture, transport and control of any emissions to atmosphere. Cleaning and maintenance schedules for such plant and equipment shall be in place and records kept of compliance to the maintenance and cleaning schedule.

Spares shall be available at short notice so that plant breakdowns can be rectified rapidly.

27. Any malfunction or breakdown leading to abnormal emissions shall be dealt with promptly and process operations adjusted until normal operations can be restored. All such malfunctions or breakdowns shall be recorded.
28. In the event of any malfunction or accident which leads to the escape of volatile organic compounds in such quantities as to affect the occupiers of other premises in the neighbourhood, the process operator shall immediately notify Environmental Protection Team at East Suffolk Council, by telephone or facsimile message within one hour, with details of the nature of the problem, the action taken so far, and the proposed action to deal with the situation.

29. A high standard of housekeeping shall be maintained.
30. Staff at all levels shall receive the necessary formal training and instruction in their duties relating to control of the process and emissions to air. A record of each person's training and instruction shall be kept for the duration of their employment connected with the equipment described within this Permit.
31. A responsible person shall be nominated to act on behalf of the company to be responsible for ensuring that; tests, emission monitoring and maintenance measures, required by this Permit are carried out.
32. Complete and immediate access to the premises shall be granted upon request to any duly authorised officer of the Environmental Protection Team at East Suffolk Council.
33. Where possible the process shall operate and adhere to the provisions of an appropriate Environmental Management System, such as ISO 14001.
34. The installation operator shall notify the Council at least 28 days in advance of any intention to cease the operation of all or part of the installation.
35. A copy of this permit shall be located on site such that all operatives involved in the process have unrestricted access to it.

Section Four

Explanatory Notes

And

Appeals Procedure

EXPLANATORY NOTE

These notes are provided for the operator of an installation or mobile plant to assist in the interpretation of their duties under the provisions of the Environmental Permitting (England and Wales) Regulations 2016. These notes do not form part of the Permit or conditions attached to it.

1. FEES

An application fee has been paid for this permit. In accordance with Environmental Permitting Regulations, the holder of a permit is required to pay an annual subsistence charge, which is subject to variation by Central Government. This charge is payable to this Council to ensure this Permit remains in force. An invoice will be sent for the appropriate subsistence charge each year.

2. TRANSFER OF PERMITS

Where you wish to transfer the Permit to another person (the proposed transferee) then the operator and the proposed transferee shall jointly make an application to the Council. The council will determine the transfer application providing it considers that the proposed holder will be the person who will have control over the operation of the installation and will ensure compliance with the conditions of the transferred Permit. A fee is also available. For further details on this please contact the Council.

3. PROCESS CHANGES

This Permit may be varied by the Council in future to take in changes recommended within updated Process Guidance notes. If at any time the process or any aspect of the activity regulated by this permit changes such that the conditions no longer reflect the activity and require alteration. You must notify the Environmental Protection Team at The Council. A summary log of all permit variation will be included.

If the change could result in a breach of the existing permit conditions or is likely to require a SUBSTANTIAL CHANGE to the installation you will be required to submit an application and pay the relevant fee. You should notify the Council 14 days before undertaking any such changes in the installation operation. If you have any doubt as to the changes being substantial you should seek the opinion of the Council before you proceed with application.

4. SURRENDER OF THE PERMIT

Where an Operator intends to cease the operation of an installation (in whole or in part) the Environmental Protection Team at East Suffolk Council should be informed in writing, such notification must include the information specified in the Environmental Permitting (England and Wales) Regulations.

5. APPEALS

Anyone who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State for the Environment. Appeals must be made in accordance with the requirements of Regulation the Environmental Permitting (England and Wales) Regulations. The right to appeal does not apply in circumstances where a notice implements a Direction of the Secretary of State.

Appeals must be received by the Appeal Body at the following address no later than 2 months from the date of the Notice being appealed against.

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

Tel: 0117 372 8812
Fax: 0117 372 6093

If an appeal is made, the main parties will be kept informed about the next steps, and will also normally be provided with additional copies of each other's representations.

To withdraw an appeal, which may be done at any time, the appellant must notify the Planning Inspectorate in writing and copy the notification to the local authority who must in turn notify anyone with an interest in the appeal.

The appeal must be in the form of a written notice or letter stating that the person wishes to appeal against the conditions of the Permit. The following items must be included:-

- a written notice;
- a statement of the grounds of appeal;
- a statement indicating whether the appellant wishes the appeal to be dealt with by written representations procedure or hearing;
- a copy of the relevant permit;
- a copy of any relevant correspondence between the appellant and the regulator; and
- a copy of any decision or notice, which is the subject matter of the appeal.
- a statement indicating whether the appellant wishes the appeal to be in the form of hearing or dealt with by way of written representations.

Appellants should state whether any of the information enclosed with the appeal has been the subject of a successful application for commercial confidentiality the Environmental Permitting (England and Wales) Regulations, and provide relevant details, see below. Unless such information is provided, all documents submitted will be open to inspection.

An appeal will not suspend the effect of the Permit.

The Permit must still be complied with.

Apportioning Costs

Guidance from the Planning Inspectorate states that operator and regulator would be normally expected to pay their own expenses during an appeal. Where a hearing or enquiry is held as part of the appeal process, by virtue of the Environmental Permitting (England and Wales) Regulations, either the appellant or the local authority can apply for costs. Applications for costs are normally heard towards the end of the proceedings and will only be allowed if the party claiming them can show that the other side behaved unreasonably and put them to unnecessary expense. There is no provision for costs to be awarded where appeals are dealt with by written representatives.

6. COMPLIANCE

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.
