

Environment Agency permitting decisions

Variation

We have decided to issue the variation for Tiverton Textile Manufacturer operated by Heathcoat Fabrics Limited.

The variation number is [EPR/BM2772IK/V006](#)

The application was duly made on 23/02/15 and completed as a normal variation to the permit.

This variation authorises the following changes to the Permit:

- Addition of an odour abatement system on the Dipping Unit Stenter, creating a new emission point to air, A15.
- Table S1.1 has been updated to remove discharge point W3 and emission points to air A6, A8 and A10 to reflect current operations and decommissioning of the Santex unit.
- Table S1.1 has been amended to reflect the operations on site by including the following activity;
Section 5.4 A(1) (a)(i) Disposal of non-hazardous waste in a facility with a capacity exceeding 50 tonnes per day involving biological treatment.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Structure of this document

- Key issues
- Annex 1 the decision checklist

Key issues of the decision

New emission point to air (A15)

The has operator identified Volatile Organic Compounds (VOCs), Formaldehyde and oil mist as the main emissions to atmosphere from the dipping unit facility, post abatement. Formaldehyde and oil mist have been assessed previously as emissions from A12. The emission limit values assigned to these compounds remain at the current levels.

The operator has completed an H1 risk assessment of the VOC emissions to air from the new abatement process to screen the short-term and long-term process contributions against relevant standards. Using the Environment Agency guidance 'H1 Annex F – Air Emissions' process contributions can be screened out as insignificant if:

- The long term process contribution (PC) is < 1% of the long term environment standard.
- The short term process contribution is <10% of the short term environmental standard.

The initial assessment assumes worst case dispersion conditions, with no allowances for thermal or momentum plume rise. The results of the initial H1 assessment are shown in the table below. The input data used within the H1 risk assessment was 75mg/m³ for VOCs, which is significantly above the results recorded pre and post abatement monitored within the emissions monitoring survey carried out by Environmental Compliance Limited on the 10th December 2014. The monitoring results showed a maximum concentration of less than 20 mg/m³ for total VOCs.

Parameter	Short Term			Long Term		
	EAL µg/m ³	PC µg/m ³	% PC of EAL	EAL µg/m ³	PC µg/m ³	% PC of EAL
VOCs Class B ¹	181,000	14.2	0.1	14,500	265	0.15

Note 1: The short and long term EALs have been taken from the Environment Agency's guidance document H1 Annex F for Butane.

From the table above the emissions of VOCs can be screened out as insignificant in that the PC is < 1% of the long term EQS/EAL and <10% of the short term EQS/EAL;

Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/ notice.

Aspect considered	Justification / Detail	Criteria met
Operator		
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.	✓
European Directives		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓
The site		
Extent of the site of the facility	<p>The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility</p> <p>An updated site plan has been provided with the application showing the new emissions to air.</p> <p>A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.</p>	✓
Biodiversity, Heritage, Landscape and Nature Conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat .</p> <p>The following sites are located within 2,000m of the installation boundary:</p> <ul style="list-style-type: none"> • Two local nature reserves are located: Palmerston Park Wood and Grand Western Canal Country Park. • Thirteen local wildlife sites • Two ancient woodland sites: Garden Copse and The Guoil. <p>A full assessment of the application and its potential to affect the sites has been carried out as part of the</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>permitting process. We consider that the application will not affect the features of the sites.</p> <p>We have not formally consulted on the application. The decision was taken in accordance with our guidance.</p>	
Environmental Risk Assessment and operating techniques		
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p> <p>The assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment, all emissions may be categorised as environmentally insignificant.</p> <p>See key issues for further information.</p>	✓
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.</p> <ul style="list-style-type: none"> • EPR 6.05 How to comply with your environmental permit; additional guidance for the textile sector. • EPR 4.02 How to comply with your environmental permit; additional guidance for speciality organic chemicals sector. • Technical Guidance Note M2: Monitoring of stack emissions to air. <p>The proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs and BAT Conclusions.</p>	✓
The permit conditions		
Updating permit conditions during consolidation.	<p>We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation. The new conditions have the same meaning as those in the previous permits.</p> <p>The operator has agreed that the new conditions are acceptable.</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Incorporating the application	<p>We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p>	✓
Emission limits	<p>We have decided that emission limits should be set for the parameters listed in the permit.</p> <p>The new emission point to Air (A15) has limits set for;</p> <ul style="list-style-type: none"> • Total VOCs (75 mg/m³) • Formaldehyde (20 mg/m³) in accordance with the existing limit for the emission point A12. 	✓
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.</p> <p>Annual monitoring requirements have been incorporated into the permit for the new emission point to air, A15.</p> <p>The frequency of ammonia monitoring for W2 has been changed to a monthly requirement (previously the permit stated no frequency) to coincide with the other monitoring requirements for emission point W2.</p>	✓
Reporting	<p>We have specified reporting in the permit.</p> <p>The existing borehole reporting requirements have been added to table S4.1.</p> <p>The reporting requirements for emission points to air A1, A9 and A12 have been changed to a 4 year period to reflect the actual requirements within table S3.1.</p> <p>The annual reporting requirements for the new emission point to air (A15) have been added to table S4.1.</p>	✓

Aspect considered	Justification / Detail	Criteria met Yes
Operator Competence		
Environment management system	There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.	✓
Relevant convictions	<p>The National Enforcement Database has been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found.</p> <p>The operator satisfies the criteria in RGN 5 on Operator Competence.</p>	✓