

# Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Day International (U.K.) Limited

Flint Group Varn House North Bank Industrial Park Brinell Drive Manchester M44 5BL

#### **Permit number**

EPR/HP3736DD

# Flint Group Varn House Permit number EPR/HP3736DD

## Introductory note

### This introductory note does not form a part of the permit

The main features of the permit are as follows.

The permit allows the operation of a Low Impact Installation (LII) for the manufacture of polymerised silicon oil under Section 4.2 (Inorganic chemicals) Part A(1)(a)(v) of Schedule 1 of the Environmental Permitting Regulations 2016.

The process comprises the manufacture of polymerised silicon oil. The process is a chemical reaction where the base raw material is heated under vacuum, a catalyst is added, and the product is then distilled and cooled which results in a thick silicon oil being produced. The plant is capable of producing different grades of silicon based products namely silicon oil, silica, antifoam emulsions and silicon emulsions. These products are supplied to different industries including, the printing, paper and pulp, food products, cosmetics, oil and gas, and pharmaceutical industries. A kerosene boiler provides heat for the reactors with the rated thermal input of 0.45 MWth.

The main production activity is to be carried out within a building. The only aqueous waste generated is during clean down procedures. This is reused for four washing cycles. The water from floor washing is collected in a stainless steel sump and transferred to intermediate bulk containers (IBCs) for disposal. Waste water is stored in IBCs inside the silicon plant and collected for off-site disposal by a waste management contractor. No waste water or effluent discharges to drains from the silicon manufacturing procedure.

Clean surface water run-off, from areas external to the silicon plant, is discharged via a drain into an interceptor which flows into the surface water system along the roadways on the site boundary. Surface water eventually discharges to the Manchester Ship Canal. Penstock valves have been fitted to the surface water discharge points to prevent discharge of spillages.

Any spillage will be cleaned up and contained within the building. There is a storage area for raw material to the northeast of building on the external concrete area with double bunding.

There are no non-permitted activities undertaken within the proposed permit boundary. However the larger site has other non-permitted activities carried out, operated by the same Operator.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application EPR/HP3736DD/A001	Duly made 06/03/17	Application for a bespoke Low Impact Installation permit to produce silicon oil.
Additional information received	26/05//17	Response to question 1 – Site Condition Report; 2 – Site plan; 3 – Environmental Risk Assessment; 4 – Environmental Statement; 5 – Technical description of the activity; 6 – Technical standard; and 7 – Effective stack height of schedule 5 notice dated 28/04/2017.
Additional information received	16/06/17	Response to question 1 g) – Updated drawings; 2 – Site plan; and 3 – Environmental Risk Assessment of schedule 5 notice dated 28/04/2017.
Additional information received	06/07/17	Response to question 1 g) - Updated drawings; 2 – site plan; 4 - Environmental Statement; and 7 –

Status log of the permit					
Description	Date	Comments			
		Effective stack height of schedule 5 notice dated 28/04/2017.			
Additional information received	11/07/17	Response to request for further information: revised H1 assessment; confirmation of thermal input and of increased stack height.			
Additional information received	13/07/17	Response to request for further information: confirmation of efflux velocity.			
Additional information received	28/07/17	Response to request for further information: confirmation of other non-permitted sites.			
Additional information received	02/08/17	Response to request for further information.			
Permit determined EPR/HP3736DD	30/08/17	Permit issued to Day International (U.K) Limited.			
(PAS Billing ref. HP3736DD).					

End of introductory note

### **Permit**

## The Environmental Permitting (England and Wales) Regulations 2016

#### Permit number

#### EPR/HP3736DD

The Environment Agency hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016

Day International (U.K.) Limited ("the operator"),

whose registered office is

Flint Group Works Old Glamis Road Dundee DD3 8HN

company registration number SC031497

to operate an installation at

Flint Group Varn House North Bank Industrial Park Brinell Drive Manchester M44 5BL

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Tom Swift	30/08/2017

Authorised on behalf of the Environment Agency

## **Conditions**

## 1 Management

#### 1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
  - in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
  - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

## 1.2 Energy efficiency

- 1.2.1 The operator shall:
  - (a) take appropriate measures to ensure that energy is used efficiently in the activities;
  - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
  - (c) take any further appropriate measures identified by a review.

#### 1.3 Efficient use of raw materials

- 1.3.1 The operator shall:
  - (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities:
  - (b) maintain records of raw materials and water used in the activities;
  - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
  - (d) take any further appropriate measures identified by a review.

# 1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
  - (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
  - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
  - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

## 2 Operations

#### 2.1 Permitted activities

2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").

#### 2.2 The site

2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

### 2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation ("plan") specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan , and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
  - (a) the nature of the process producing the waste;
  - (b) the composition of the waste;
  - (c) the handling requirements of the waste;
  - (d) the hazardous property associated with the waste, if applicable; and
  - (e) the waste code of the waste.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

## 2.4 Improvement programme

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.
- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

## 3 Emissions and monitoring

#### 3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 table S3.1 and S3.2.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

### 3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
  - (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
  - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

#### 3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
  - (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
  - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

#### 3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
  - (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;

(b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

### 3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
  - (a) point source emissions specified in tables S3.1 and S3.2.

#### 4 Information

#### 4.1 Records

- 4.1.1 All records required to be made by this permit shall:
  - (a) be legible;
  - (b) be made as soon as reasonably practicable;
  - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
  - (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
    - (i) off-site environmental effects; and
    - (ii) matters which affect the condition of the land and groundwater.
- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

## 4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
  - (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
  - (b) the annual production /treatment data set out in schedule 4 table S4.2; and
  - (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.
- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
  - (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
  - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
  - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter, if during that quarter the total amount accepted exceeds 100 tonnes of non-hazardous waste or 10 tonnes of hazardous waste.

#### 4.3 Notifications

#### 4.3.1 In the event:

- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
  - (i) inform the Environment Agency,
  - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
  - (iii) take the measures necessary to prevent further possible incidents or accidents;
- (b) of a breach of any permit condition the operator must immediately—
  - (i) inform the Environment Agency, and
  - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

(a) the death of any of the named operators (where the operator consists of more than one named individual);

- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
  - (a) the Environment Agency shall be notified at least 14 days before making the change; and
  - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.

#### 4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately" in which case it may be provided by telephone.

# Schedule 1 – Operations

Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
S4.2 A1 (a) (v) Producing inorganic chemicals such as nonmetals, metal oxides, metal carbonyls or other inorganic compounds (for example calcium carbide, silicon, silicon carbide, titanium dioxide).	Production of silicon oil.	From receipt and storage of raw materials to the reaction and storage, and dispatch of the finished product.
Directly Associated Activity		
Kerosene boiler	Operation of 1 kerosene boiler with an aggregated thermal rated input not exceeding 0.45 MWth, for heating requirements of the reactor.	From receipt of raw materials and fuels, to release of combustion products to air and associated wastes removed from site.
Storage and handling	Storage and handling of waste from silicon oil manufacture.	From receipt, storage and handling, to despatch or reuse in silicon oil manufacture.

Table S1.2 Operating techniques				
Description	Parts	Date Received		
Application	Part B2 of the application document(s) provided in response sections 2d, 3, 4a, 5a, b and c, 6 and Appendix 1, and in support of Part B3 of the application form.	Duly Made 06/03/2017		
Response to Schedule 5 Notice dated 28/04/2017	Response to question 1 c) detailing installation of chemical resistant coating within brick bund; 1 d) detailing the chemical delivery and transfer system from tank to building; 1 e) detailing protection of drains during delivery and transfer of chemicals; 1 h) details of secondary containment; 5 Technical description of the activity; and 6 Technical Standard.	26/05/2017		
Response to Schedule 5 Notice dated 28/04/2017	Response to question 1 g) and question 2 Updated drawings including drainage and site plan.	06/07/2017		
Response to further information request dated 01/08/2017	Response to question 2 a) Confirmation of deadline for completion date of installation stack height; question 3 a) and b) Confirmation of detection system; question 4 a) Confirmation of frequency of HAZOP study; question 5 a) Emission points drawing; question 6 a) and b) Clarification of capacity of secondary containment for building and intermediate and raw material tanks.	02/08/2017		

Table S1.3 Improvement programme requirements				
Reference	Requirement	Date		
IC1	The operator must submit a report demonstrating that the emissions from the boiler are insignificant in line with the Environment Agency's H1 guidance. The report shall include details of any changes made to the site	31/12/2017		

Table S1.3 Improvement programme requirements				
Reference	Requirement	Date		
	in association with this requirement, for example changes in plant or infrastructure and any additional impact assessments carried out. The report shall be submitted in writing to the Environment Agency for approval.			
IC2	The operator must complete a review of the construction, integrity and secondary containment for tanks, sumps, containers and bunds against the standard set out in the relevant guidance including but not limited to:  • Environment Agency web guide Control and Monitor Emissions	31/12/2017		
	for your Environmental Permit (found on www.gov.uk); and			
	<ul> <li>CIRIA Containment Systems for the Prevention of Pollution (C736)</li> </ul>			
	A written report outlining the findings from the review including identified improvements shall be submitted in writing to the environment agency for approval. A timescale for implementation of any improvements shall be agreed in writing with the Environment Agency.			

# Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
-	-

# Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 [Point A1 on Emission points plan in Schedule 7]	Kerosene Boiler	Products of combustion	No limit set			

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location Source Parameter Unit) Reference period Monitoring frequency Standard or method					standard or	
A2 [Point A2 on Emission points plan in Schedule 7]	Clean surface water	No parameters set	No limit set			

# Schedule 4 – Reporting

There is no reporting under this schedule.

Table S4.1 Reporting of monitoring data					
Parameter	Emission or monitoring point/reference	Reporting period	Period begins		
Emissions to air Parameters as required by condition 3.5.1.	A1	Every 12 months	1 January		

Table S4.2: Annual production/treatment		
Parameter	Units	
Silicon oil produced	tonnes	

Table S4.3 Performance parameters				
Parameter	Frequency of assessment	Units		
Water usage	Annually	m <sup>3</sup>		
Energy usage	Annually	MWh		
Total raw material used	Annually	tonnes		

Table S4.4 Reporting forms				
Media/parameter	Reporting format	Date of form		
Air	Form air 1 or other form as agreed in writing by the Environment Agency	30/08/2017		
Water and Land	Form water 1 or other form as agreed in writing by the Environment Agency	30/08/2017		
Water usage	Form water usage 1 or other form as agreed in writing by the Environment Agency	30/08/2017		
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	30/08/2017		
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	30/08/2017		

# Schedule 5 - Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

### Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	
	any malfunction, breakdown or failure of equipment or techniques, nce not controlled by an emission limit which has caused, is pollution
To be notified within 24 hours of	detection
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	
(b) Notification requirements for t	the breach of a limit
To be notified within 24 hours of	detection unless otherwise specified below
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

(b) Notification requirements for the breach of a limit					
To be notified within 24 hours of	detection unless	otherwise specified bel	ow		
Measures taken, or intended to be taken, to stop the emission					
Time periods for notification follo	wing detection o	of a breach of a limit			
Parameter			Notification period		
(c) Notification requirements for	the detection of a	any significant adverse	environmental effect		
To be notified within 24 hours of	detection				
Description of where the effect on the environment was detected					
Substances(s) detected					
Concentrations of substances detected					
Date of monitoring/sampling					
Part B – to be submit		n as practicable	9		
Any more accurate information on t notification under Part A.	he matters for				
Measures taken, or intended to be taken, to prevent a recurrence of the incident					
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission					
The dates of any unauthorised emissions from the facility in the preceding 24 months.					
Name*					
Post					
Signature					
Date					

<sup>\*</sup> authorised to sign on behalf of the operator

## Schedule 6 – Interpretation

"accident" means an accident that may result in pollution.

"application" means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

"authorised officer" means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

"EP Regulations" means The Environmental Permitting (England and Wales) Regulations SI 2010 No.675 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

"emissions of substances not controlled by emission limits" means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

"groundwater" means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

"Industrial Emissions Directive" means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or
- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

"year" means calendar year ending 31 December.

# Schedule 7 – Site plan

## Site plan



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END OF PERMIT