

Notice of variation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

GKN Aerospace Services Limited

GKN Aerospace Services Limited - Filton
PO Box 500
Golf Course Lane
Filton
Bristol
BS34 9AU

Variation application number

EPR/MP3132XB/V002

Permit number

EPR/MP3132XB

GKN Aerospace Services Limited - Filton

Permit number EPR/MP3132XB

Introductory note

This introductory note does not form a part of the notice

The following notice gives notice of the variation of an environmental permit.

This variation permits the following changes:

- The addition of a tartaric acid anodising line to the permit as the following listed activity:
 - Section 2.3 Part A(1)(a) surface treating metals and plastic materials – tartaric acid line.
- The addition of the following directly associated activities (DAAs):
 - water heating;
 - chemical storage; and
 - hazardous waste disposal.
- The removal of emission points A31, A32 and A51 from table 2.2.1.
- The addition of emission points A42, A43 and A44 associated with the new tartaric acid line to table 2.2.1.
- The updating of the regulated facility address.

The new tartaric acid line has a lower environmental impact and risk than the existing chromic acid anodising line, which it is intended to replace in the near future.

The schedules specify the changes made to the original permit.

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

Status log of the permit		
Description	Date	Comments
Application BV6153IA	Received 09/07/2004	
Effluent Analysis	Request dated 12/08/2004	Response dated 25/08/2004 by e-mail
Surface water details requested during site visit.	Request dated 02/09/2004	Letter received 16/09/2004
Sand filter proposal for effluent treatment plant.	Request dated 03/09/2004	Letter dated 14/09/2004
Permit determined	22/09/2004	
Transfer Application MP3132XB	Received 18/03/2008	
Request to Extend Determination	Received 04/06/2008	
Transfer Application Determined	01/09/2008	Transfer effective 05/01/2009
Application EPR/MP3132XB/V002 (variation and consolidation)	Duly made 01/02/2017	Application to vary the permit
Additional information received	16/03/2017	Response to Schedule 5 Notice dated 03/03/17
Additional information received	23/03/2017	Response to Schedule 5 Notice dated 03/03/17
Variation determined EPR/MP3132XB/V002	22/05/2017	Varied permit issued.

End of introductory note

Notice of variation

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPR/MP3132XB

Issued to

GKN Aerospace Services Limited ("the operator")

whose registered office is

**Ferry Road
East Cowes
Isle of Wight
PO32 6RA**

company registration number 00355922

to operate a regulated facility at

**GKN Aerospace Services Limited - Filton
PO Box 500
Golf Course Lane
Filton
Bristol
BS34 9AU**

to the extent set out in the schedules.

The notice shall take effect from 22/05/2017

Name	Date
Mike Jenkins	22/05/2017

Authorised on behalf of the Environment Agency

Schedule 1 – conditions to be deleted

None.

Schedule 2 – conditions to be amended

The following conditions are amended as a result of the application made by the operator.

Table 1.1.1, as referenced in condition 1.1.1, is amended as follows:

Table 1.1.1		
Activity listed in Schedule 1 of the PPC Regulations / Associated Activity	Description of specified activity	Limits of specified activity
Section 2.3 Part A(1)(a) Surface Treating Metals and Plastic Materials	Surface Treatment of Metals	From receipt of raw materials to despatch of products and waste. Chromic acid line.
Section 2.3 Part A(1)(a) Surface Treating Metals and Plastic Materials	Surface Treatment of Metals	From receipt of raw materials to despatch of products and waste. Tartaric acid line.
Directly Associated Activity	Effluent Treatment	Treatment of process effluent prior to discharge to public sewer.
Directly Associated Activity	Water Heating	Heating of process water using a gas fired water heater.
Directly Associated Activity	Chemical Storage	Storage of chemical products for use in the production process.
Directly Associated Activity	Hazardous Waste Disposal	Hazardous waste disposal of solids from effluent treatment activities.

Table 1.4.1, as referenced in condition 1.4.1, is amended as follows to include improvement conditions 12 and 13:

Table 1.4.1: Improvement Programme		
Reference	Requirement	Date
1	Submit a methodology, including timescales, to the Agency in writing for the implementation of alternative technical measures to control emissions including, but not limited, to the following areas: <ul style="list-style-type: none"> ▪ Treatment tank temperature control ▪ Treatment tank chemical concentration ▪ Treatment tank levels and freeboard depth ▪ Treatment tank agitation methods LEV system exhaust and extraction rate	31/01/2005
2	Implement alternative technical measures as defined by the approved methodology proposed in response to IP1.	As agreed in response to IP1
3	Provide to the Agency a report detailing improvements to the rinse techniques used and also the installation effluent treatment unit in terms of reducing both the water usage and the emissions to sewer from S1. The report shall include a BAT justification for the techniques used and where necessary the report should also include the details for upgrading or replacement of current techniques. The report shall provide a plan with time-scales for the implementation of the improvements identified that shall be agreed by the Agency in writing.	30/04/2005
4	The operator shall complete the improvements identified in IP3 relating to rinse techniques and the installation effluent treatment plant.	As agreed in response to IP3

5	<i>The Operator shall submit a proposal for installation of secondary containment around tanks in Centre 3: Stainless Steel and Titanium Pickling area for approval by the Agency and install secondary containment as agreed.</i>	31/10/2005
6	The Operator shall include testing of secondary containment for surface treatment tanks in Centre 5 in internal maintenance procedure EP4-6-010.	30/11/2004
7	The Operator shall submit their report, to the Agency in writing, which investigated anomalies in the trade effluent drain and agree remedial actions (If any) with the Agency.	31/01/2005
8	The Operator implement remedial actions as agreed in IP 7.	31/10/2005
9	The Operator shall provide a report, including a timetable, for the installation, commissioning of the proposed effluent treatment plant sand filter, and also following commissioning, the carrying out of a monitoring programme. This report shall be agreed with the Agency in writing.	31/10/2004
10	The Operator shall provide notification, in writing to the Agency, on the completion of the commissioning of the sand filter and commencement of the monitoring programme as detailed in IP9. The monitoring programme shall include the reporting to the Agency of results on a monthly basis for four months, or as otherwise agreed with the Agency. Within one month from the end of this monitoring programme, the results shall be used by the Operator to provide a BAT justification for the use of the sand filter to prevent the discharge of chromium to sewer in a report that shall be agreed by the Agency in writing.	As agreed in IP9
11	The Operator shall submit a report in writing to the Agency that considers and reports the mass release of cadmium and mercury from the installation to the sewer discharge at S1 on map (B1 Fig 3).	31/10/2005
12	The operator shall submit a written procedure to the Environment Agency for approval. The procedure must detail the inspection, testing and maintenance regimes for the tanks, pipes, vents and valves serving the tartaric acid anodising line. The notification requirements of condition 1.4 will be deemed to have been complied with on written approval by the Environment Agency of the procedure. You must implement the procedure as approved, and from the date stipulated by the Environment Agency.	31/08/2017
13	The operator shall submit a written procedure to the Environment Agency for approval. The procedure must detail the maintenance and management procedures for the fume extraction system serving the tartaric acid anodising line, including procedures covering the instances of system failure. The notification requirements of condition 1.4 will be deemed to have been complied with on written approval by the Environment Agency of the procedure. You must implement the procedure as approved, and from the date stipulated by the Environment Agency.	31/08/2017

Table 2.1.1, as referenced by condition 2.1.1, has been amended to the following:

Table 2.1.1: Operating techniques		
Description	Parts	Date Received
Letter received 16/09/2004 'Airbus UK Ltd., Filton, Avonmouth, Bristol, PPC Permit Application BV 6153'.	Page 2 Paragraph 4 entitled 'Discharge to Sewer (under the terms of the consent from Wessex Water)'	16/09/2004
Application.	The response to questions 2.1 and 2.2 given in pages/section 10 to 86/sections 2.1 and 2.2 of the application excluding section 2.1.2	09/07/2004
Application Documents	Document Reference MP3132XB – Var, Application for Variation of Permit MP3132XB	07/12/2016
Schedule 5 Response	Environmental Manual GKN- EM01 (Jan 2017). Emergency Response Procedures HB09, 001 to 010 (Jan 2017). HAZOP Effluent Treatment C2544-PE-HZ-001 (May 2016). HAZOP Automatic Tartaric Sulphuric Acid Anodising Plant C2581-PE-HZ-001 (Dec 2016). Maintenance of Assets PROC MF02 (Jan 2017).	16/03/2017
Email received 19/05/2017 'New TSA Facility Chemical Delivery Docs'	All Parts	19/05/2017

Table 2.2.1, as referenced in condition 2.2.1.2, is amended as follows to remove emission points A31, A32 and A51 and add emission points A42, A43 and A44.

Table 2.2.1 : Emission points to air		
Emission reference description	point or Source	Location of emission point
A35	Centre 3 Stainless Steel and Titanium Pickling Hydrofluoric / Nitric Acid Tank	A35 on site plan
A36	Centre 3 Stainless Steel and Titanium Pickling Nitric Acid Tank	A36 on site plan
A41	Centre 4 Chrome / Sulphuric Treatment Tanks via scrubber and droplet eliminator	A41 on site plan
A42	Paint Booth exhaust (Part B)	A42 on site plan
A43	Centre 4 Tartaric / Sulphuric Tanks via scrubber and droplet eliminator	A43 on site plan
A44	Water Heater exhaust	A44 on site plan

Schedule 3 – conditions to be added

None.

Schedule 4 – amended plan

Amended plan attached.

