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Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Meggitt Aerospace Limited
Carbon Brake Facility, Coventry
Holbrook Lane
Coventry
Warwickshire

Variation application number

EPR/BN7109IH/V008

Permit number

EPR/BN7109IH

CV6 4AA

Carbon Brake Facility, Coventry Permit number EPR/BN7109IH

Introductory note

This introductory note does not form a part of the notice

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. All the conditions of the permit have been varied and are subject to the right of appeal.

The changes permitted by this variation are summarised as follows:

- The installation of an additional carbonisation furnace operated in parallel to the existing carbonisation furnace already included in the permit prior to this variation;
- Due to the additional capacity of the carbonisation process, the installation of a new thermal oxidiser unit (new 'Lesni thermal oxidiser') to abate pollutants in the carbonisation exhaust gas, primarily consisting of volatile organic compounds (VOC), hydrogen cyanide and ammonia, generated from the two carbonisation furnaces operating in parallel under the new permitted configuration. The abated flue gases from the new thermal oxidiser are emitted from a new emission point (A22). Upon completion of the commissioning activities for the new thermal oxidiser, this will replace the existing thermal oxidiser (existing emission point A1). The main pollutants emitted by the new thermal oxidiser (emission point A22) are oxides of nitrogen, carbon monoxide and hydrogen cyanide.

The new thermal oxidiser consists of best available technology (BAT) including low NOx burners and design of the combustion chamber to achieve sufficient residence time and operating temperatures to ensure thermal destruction of VOC and hydrogen cyanide and promote the selective non-catalytic reduction of nitrogen oxides generated in the combustion process, by effect of the ammonia concentrations available in the exhaust gases emitted from the carbonisation furnaces. Improvement conditions (IC16, IC17 and IC18) have been imposed to ensure that proposed design concept is further validated and optimised, based on actual monitoring data during the commissioning and early stages of operations of the new thermal oxidiser.

- The inclusion of three new emission points to air consisting of air extractors fitted with cartridge filters for abetment of dust from the manufacturing activities (emission points A23, A24 and A25).
- The installation of two new cooling towers to replace the existing units which have reached the end of their economic life and associated new discharge point to sewer (S3) for the cooling towers blowdown effluent stream
- The installation of a storage system for liquefied natural gas (LNG) which is used during the start-up period in the existing carbon vapour deposition (CVD) furnaces.
- The inclusion of an existing building (DAIPC building) used for indoor storage of the installation main raw material (oxidised polyacrylonitrile fibre) in the permit boundary.
- The expansion of the permitted boundary the north of the installation to include the yard allocating the new cooling towers and LNG tank and the abovementioned DAIPC building.

Also, the following administrative changes to the permit have been made as part of this variation and consolidation of the permit:

- The primary activity carried out at the installation ('carbonisation of carbonaceous materials') has been amended as S1.2 A1 (f) to reflect the change of scheduled activity within the Environmental Permitted Regulations;

- The description of activities AR2, AR3 and AR4 in Table S1.1 of the permit have been amended to make them more clear, even if these activities are unchanged as a result of this variation;
- Emission point A2, denoted as 'RK thermal oxidiser' has been removed as it has been confirmed to be no longer operational;
- Emission point from the 'paint spraying booth' has been renumbered as A26 to correct an historical numbering mistake;
- Historical improvement conditions have been marked as completed.

The environmental risk associated with the increased emissions to air of pollutants permitted by this variation has been assessed according to the Environment Agency's H1 methodology and air dispersion modelling.

The installation is located approximately 8 km from Ensor's Pool SAC site, protected under the Conservation of Habitats and Species Regulations 2017. The installation is not located within the specified distance of any SSSI sites. The site is subject to a Climate Change Agreement and operates an environmental management system externally accredited to ISO 14001.

The rest of the installation continues to operate unchanged as follows:

Meggitt Aerospace Limited operates the Carbon Brake Facility, Coventry. The site is located to the north of Coventry City centre, in the Whitmore Park area. The main purpose of the activity is the production of brake discs for aircraft through the vapour deposition of carbon through the cracking of natural gas or other hydrocarbons onto material formers. The process takes oxidised polyacrylonitrile (OPAN) fibre and converts it into a carbon fibre through mechanical and heat treatment (carbonisation process). The fibre is converted to disc shaped formers for the disc production through cutting to the required shape. The carbon formers are then turned into carbon discs through the vapour deposition of carbon onto the fibre formers in six furnaces, utilising natural gas and other hydrocarbons. They are then heat treated converting the carbon structures into graphite before finishing processes such as machining are undertaken. The processes operate on a batch basis. Finished discs are painted with anti-oxidant paint before dispatch.

The installation also contains the boiler house where four boiler units are used to generate steam. The partially cracked gas from the chemical vapour deposition furnaces is used as fuel with natural gas makeup. Furnace No. 9 is the only exception to this where the gas is flared. The steam is fed through steam ejectors to generate a vacuum, used in the furnaces during the carbon vapour deposition process. Emission control to air for the carbonisation process is undertaken through a gas-fired thermal oxidiser. In addition there are indirect discharges to sewer and one indirect discharge to surface water. The site does not have an effluent treatment plant.

The schedules specify the changes made to the 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 EPR/BN7109IH/A001	Duly made 19/09/06	
Additional information received	05/09/06 02/03/07 15/03/07 21/03/07 02/04/07	
	31/05/07	
Permit determined EPR/BN7109IH	07/06/07	
Variation EPR/BN7109IH/V002	Withdrawn 02/04/08	Application withdrawn

Status log of the permit		
Description	Date	Comments
Variation determined EPR/BN7109IH/V003	20/06/08	
Variation application EPR/BN7109IH/V004	Duly made 21/03/11	
Variation determined EPR/BN7109IH/V004	24/03/11	
Agency initiated variation determined EPR/BN7109IH/V005	28/05/13	Environment Agency initiated variation to implement the changes introduced by IED.
Variation application EPR/BN7109IH/V006	21/04/18	Application returned as not duly made.
Part surrender application EPR/BN7109IH/S007	Duly made 10/05/19	Application to surrender the permitted area occupied by Building D4 (old boiler house) and storage containers on car park area.
Part surrender determined EPR/BN7109IH/S007	31/05/19	Part surrender complete.
Application EPR/BN7109IH/V008 (variation and consolidation)	Duly made 10/05/19	Application to vary and update the permit to modern conditions, including: installation of a new carbonisation furnace and a new thermal oxidiser; installation of new cooling towers; installation of an LNG storage system; expansion of the permit boundary to accommodate the new cooling towers, the new LNG storage and a new area for storage of raw materials.
Application EPR/BN7109IH/V008 Response to Schedule 5 Notice issued 30/05/19	Received 01/07/19	Revised air impact assessment report.
Application EPR/BN7109IH/V008 Response to Schedule 5 Notice issued 02/07/19	Received 12/08/19	Additional information on existing emission points, commissioning strategy for the new equipment, design measures to prevent accidental impacts, noise impact assessment and noise management plan.
Application EPR/BN7109IH/V008 Additional information	Received 30/08/19	Updated noise management plan
Application EPR/BN7109IH/V008 Additional information	Received 09/09/19	Additional information on existing emission point A4.
Application EPR/BN7109IH/V008 Additional information	Received 19/11/19	Additional information on inputs to noise impact assessment.
Application EPR/BN7109IH/V008 Response to Schedule 5 Notice issued 17/12/19	Received 06/01/2020	Revised noise impact assessment.
Application EPR/BN7109IH/V008 Response to Schedule 5 Notice issued 17/12/19	Received 09/01/2020	Updated noise management plan.

Status log of the permit		
Description	Date	Comments
Variation determined EPR/BN7109IH	13/01/2020	Varied permit issued.
(PAS Billing Ref. DP3335QR)		

End of introductory note

Notice of variation and consolidation

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/BN7109IH

Issued to

Meggitt Aerospace Limited ("the operator")

whose registered office is

Atlantic House Aviation Park West Bournemouth International Airport Christchurch Dorset BH23 6EW

company registration number 03477890

to operate a regulated facility at

Carbon Brake Facility, Coventry Holbrook Lane Coventry Warwickshire CV6 4AA

to the extent set out in the schedules.

The notice shall take effect from 13/01/2020

Name	Date
Simon Hunt	13/01/2020

Authorised on behalf of the Environment Agency

Schedule 1

All conditions have been varied by the consolidated permit as a result of the application made by the operator.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/BN7109IH

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/BN7109IH/V008 authorising,

Meggitt Aerospace Limited ("the operator"),

whose registered office is

Atlantic House Aviation Park West Bournemouth International Airport Christchurch Dorset BH23 6EW

company registration number 03477890

to operate an installation at

Carbon Brake Facility, Coventry Holbrook Lane Coventry Warwickshire CV6 4AA

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

Name	Date
Simon Hunt	13/01/2020

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:
 - (a) 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.

2.5 Pre-operational conditions

2.5.1 The operations specified in schedule 1 table S1.4 shall not commence until the measures specified in that table have been completed.

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 tables S3.1, S3.2 and S3.3.
- 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.

3.5 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, S3.2 and S3.3;
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by the Environment Agency.

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.

4.3 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 (a)(i), or 4.3.1 (b)(i) where the information relates to the breach of a limit specified in the permit, 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.
- 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.
- 4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
 - (a) a decision by the Secretary of State not to re-certify the agreement;
 - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
 - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

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 reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	S1.2 A1 (f)	Activities involving the carbonisation of carbonaceous materials, including: - Preparation of raw materials; - Carbonisation of prepared raw material in two carbonisation electrically powered furnaces; - Carbon vapour deposition (CVD) in 6 electrically powered furnaces.	From receipt and storage of raw materials to storage of intermediate product and waste disposal.
AR2	S6.2 A1 (a)	Producing carbon by means of graphitisation: preparation and heat treatment of carbon brake discs.	From intermediate product storage to final product dispatch and waste disposal, including product machining and assembly.
	Directly Associate	ed Activity	
AR3	Steam generation	Generation of steam in 4 boilers (existing Medium Combustion Plants) fired on natural gas and waste gas recycled from the carbon vapour deposition process.	Includes natural gas receipt, waste gas recycling from the carbon vapour deposition process, demineralised water plant and emission of flue gases through emission points A10, A11, A12 and A13
AR4	Thermal oxidiser abatement plant	Abatement of exhaust gases emitted from two carbonisation furnaces in a thermal oxidiser.	From the outlet of carbonisation furnaces including all ancillary ducting to Lesni thermal oxidiser, emitting to air through emission point A22. Use of existing Lesni thermal oxidiser emitting through emission point A1 is permitted until completion of commissioning of the new thermal oxidiser emitting through emission point A22.
AR5	Propane storage and use	Storage and use of propane as a raw material for the carbon vapour deposition furnaces.	From receipt of propane to use in the furnaces.
AR6	LNG storage and distribution system	Storage and use of liquefied natural gas (LNG) as a raw material for the carbon vapour deposition furnaces.	From receipt of LNG, its storage in 8 tonnes capacity tank, to use in the CVD furnaces.
AR7	Cooling system	Process cooling in two evaporative cooling towers.	Primary cooling system consisting of closed loop system exchanging heat within an open evaporative cooling system.

Table S1.2 Operating techniques			
Description	Parts	Date Received	
Application	The response to section B2.1 and B2.2, including the appendix to the application B2 Technical Description.	25/08/06	
Receipt of additional information to the application (from actions on site visit/meeting report).	Explanation of current abatement equipment modifications and requirements for a post commissioning report to allow limit setting.	15/01/07	
Further information received from actions post site visit.	Responses to questions 2, 4, 5 and 6.	02/03/07	
Further information regarding operations within permit installation and corrections to application.	Complete response.	21/03/07	
Further information regarding position and operation of CVD furnace emergency gas vents.	Complete response.	02/04/07	
Application for Variation EPR/BN7109IH/V003 (PAS No. HP3832XH)	Documents J1 and S1.	17/03/08	
Application for Variation EPR/BN7109IH/V004	Response to question 3a on application form C3.	17/03/11	
Application for Variation EPR/BN7109IH/V008	The following sections of 'Supporting Information Document' submitted with the application: - Section 2 – Description of changes - Section 3 - Environmental Risks and Effects - Section 4 - Best Available Techniques (BAT) Assessment As complemented and amended by subsequent responses to requests for information and Schedule 5 Notices.	24/12/18	
Application for Variation EPR/BN7109IH/V008 Response to request for additional information	Document titled 'Response to further information request – May 2019' (all sections and appendices, except Appendix C).	10/05/19	
Application for Variation EPR/BN7109IH/V008 Response to Schedule 5 Notice dated 30/05/19	Document titled 'Air Impact Assessment'.	01/07/19	
Application for Variation EPR/BN7109IH/V008 Response to Schedule 5 Notice dated 02/07/19	Document titled 'Application for Variation of Environmental Permit Reference EPR/BN7109IH, Meggitt Aerospace Limited - Response to Schedule 5 Notice – August 2019' including additional information on existing emission points, commissioning strategy for the new equipment, design measures to prevent accidental impacts (all responses to Schedule 5 Notice dated 02/07/19 and attached appendices, except noise impact assessment, Appendixes B and D).	12/08/19	

Table S1.2 Operating techniques			
Description	Parts	Date Received	
Application for Variation EPR/BN7109IH/V008 Response to Schedule 5 Notice dated 17/12/19	Document titled 'Updated noise impact assessment of new cooling towers', implementing revised proposal for noise mitigation of new cooling towers.	06/01/2020	
	Updated Noise Management Plan implementing revised proposal for noise mitigation of new cooling towers to consist of 'whisperer quiet fan' model, approved by the Environment Agency.	09/01/2020	

Table S1.3 I	Table S1.3 Improvement programme requirements		
Reference	Requirement	Date	
IC1	The operator shall submit a written proposal, for approval by the Agency, specifying the structure, content and submission date of a report detailing the commissioning of the Lesni abatement plant.	Completed (Variation V003)	
IC2	The operator shall submit the report specified in IC1 above to the Agency in writing. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report.	Completed (Variation V003)	
IC3	The operator shall submit a report in writing to the Agency detailing the emissions to air from the RK abatement plant. The report shall include a justification for the retention of the equipment and where planned, any improvements to the equipment and its operation. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report. The improvements shall be implemented from the date of approval by the Agency in writing.	Completed (Variation V003)	
IC4	The operator shall establish the impact on air quality of emissions from the installation through the use of an appropriate assessment methodology, following the completion of IC3. The results of the review and assessment shall be submitted to the Agency in a written report. Using the assessed impacts, where appropriate, the report should include a review of options for reducing emissions to air, ensuring that the impact is reduced to acceptable levels in accordance with air quality standards. Where improvements are required to reduce emissions, these shall be detailed in the report together with a timetable for their implementation, for approval by the Agency. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report. The proposals shall be implemented by the operator from the date of approval by the Agency in writing.	Completed (Variation V003)	
IC5	The operator shall develop a written site closure plan, having regard to the requirements set out in Section 2.11 of the Agency IPPC Sector Guidance Note Combustion Activities. Upon completion of the plan a summary of the document shall be submitted to the Agency in writing.	Completed (Variation V003)	
IC6	The operator shall submit a written report to the Agency detailing the results of a survey of hard-standing, kerbing and secondary containment for raw material, intermediate product and waste storage areas having regard to section 2.2.9 of the Agency IPPC Sector Guidance Note Combustion Activities. Where appropriate the report shall contain proposals for remedial measures, together with a timetable for their implementation, for approval by the Agency.	Completed (Variation V003)	

Reference	Requirement	Date
	The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the plan. The proposals shall be implemented by the operator from the date of approval by the Agency.	
IC7	The Operator shall develop a written accident management plan having regard to the requirements set out in Section 2.8 of Agency IPPC Sector Guidance Note Combustion Activities. The plan shall include a review of the compatibility of raw material storage, minimising accident potential. A copy of the accident management plan shall be submitted in writing to the Agency for approval.	Completed (Variation V003)
IC8	The Operator will undertake an assessment of subsurface structures (including the water reservoirs). The assessment will take into account the requirements of section 2.2.9 of the Agency IPPC Sector Guidance Note Combustion Activities. A written report summarising the findings of the investigations and a timescale for implementation of any improvements shall be submitted to the Agency.	Completed (Variation V003)
IC9	The operator shall submit a report in writing to the Agency, reviewing the operation of the Lesni abatement plant following the completion of commissioning. An assessment of the adequacy of the control and maintenance procedures should be included as well as a risk assessment of equipment availability.	Completed (Variation V003)
	The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report.	
	The measures shall be implemented from the date of approval in writing by the Agency.	
IC10	The operator shall submit a report to the Agency, reviewing the emissions from the heat treatment facilities used in the graphitisation of the carbon brake discs. The review shall include the releases to air and the minimisation of carbon black usage.	Completed (Variation V003)
	Where improvements are identified a timetable for their implementation shall be submitted to the Agency for approval.	
	The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report.	
	The measures shall be implemented from the date of approval in writing by the Agency.	
IC11	The operator shall submit a report in writing to the Agency reviewing the efficient use of energy at the installation following the requirements of section 2.7 of Agency IPPC Sector Guidance Note Combustion Activities. A review of the improvements undertaken as well as further improvements should be included in the report. Where improvements are identified in line with BAT, a timetable for their implementation shall be submitted to the Agency for approval.	Completed (Variation V004)
	The reporting of specific energy usage per unit output should also be defined as part of the report and agreed in writing by the Agency.	
	The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report.	
	The improvements shall be implemented from the date of approval in writing by the Agency.	
IC12	The operator shall undertake an assessment of all waste stored on site and include a waste minimisation audit. The assessment shall take into account the requirements of sections 2.4.2 and 2.5 of Agency IPPC Sector Guidance Note Combustion Activities. A written report summarising the findings of the assessment and a timescale for	Completed (Variation V004)

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	implementation of any improvements shall be submitted to the Agency for approval.	
	The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report.	
	The improvements shall be implemented from the date of approval in writing by the Agency.	
IC13	The operator shall submit a report in writing to the Agency reviewing the efficiency of water use at the installation following the requirements of section 2.4.3 of Agency IPPC Sector Guidance Note Combustion Activities. In line with the requirements of BAT, process mapping and mass balances shall form part of the report. Where improvements are identified a timetable for their implementation shall be submitted to the Agency for approval.	Completed (Variation V004)
	The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report.	
	The improvements shall be implemented from the date of approval in writing by the Agency.	
IC14	The operator shall submit a report to the Agency reviewing options for abatement of NOx releases from the Lesni thermal oxidiser. The review shall include cost, practicality and effectiveness, together with the significance of the releases. Where improvements are identified a timetable for their implementation shall be submitted to the Agency for approval.	Completed (Variation V004)
	The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report.	
IC15	The operator shall amend the Environmental Management System to include the changes brought in through this variation. This shall include any changes relating to accident risk.	Completed (Variation V008)
IC16	The operator shall carry out a review of the emissions of nitrogen oxides (as NO ₂) emitted from the new thermal oxidiser (emission point A22) and submit a technical report for approval by the Environment Agency documenting the results of this review.	By 12 months from the start of commercial operations of the
	The review shall be informed by the results of representative monitoring campaigns of NOx carried out during the commissioning and early months of operations, consisting of a sufficient number of periodic samples of emissions of NOx for a representative period of time.	new Lesni thermal oxidiser (emission point A22)
	This review shall be aimed at confirming whether the design of the thermal oxidiser is such that the concentrations of ammonia in the offgas from the carbonisation furnaces are sufficient to achieving the selective non-catalytic reduction of nitrogen oxides in the thermal oxidiser explained by the operator in the application documents for variation V008.	
	As part of this improvement condition, the operator shall identify opportunities to reduce emissions of NOx below the emission limit for NOx from A22 set in Table 3.1, and agree an emission reduction target in writing with the Environment Agency.	
IC17	Should the results of the review undertaken for IC16 show that additional abatement is needed to ensure that the emissions of nitrogen oxides (as NO2) from emission point A22 are reduced to the target agreed with the Environment Agency, the operator shall develop a plan committing to the implementation of such additional abatement measures within an agreed timeframe.	By 6 months from the approval of IC16
	The plan shall include:	

Reference	Requirement	Date
	- A technical description of the design of the proposed additional abatement technique;	
	- A justification for the proposed abatement implementation timeframe.	
	The plan, where required, shall be approved in writing by the Environment Agency. The Operator shall provide to the Environment Agency periodic updates on the progress of the plan implementation until the installation and start-up of any additional abatement equipment/technique is confirmed.	
IC18	The operator shall undertake a risk assessment for emissions of ammonia from the operation of the thermal oxidiser (emission source A22) to confirm that the ammonia slip is negligible as stated in the application documents for variation V008 and that the environmental risk for emissions of this pollutant is insignificant according to the Environment Agency's H1 methodology and assessment criteria or air dispersion modelling where appropriate.	By 12 months from the start of commercial operations of the new Lesni thermal oxidiser (emission point A22)
	The review shall be informed by the results of representative monitoring campaigns of ammonia carried out during the commissioning and early months of operations, consisting of a sufficient number of periodic samples.	
	Where the results of this assessment should demonstrate that the emissions of ammonia are negligible and the risk is insignificant, the operator may propose a reduced monitoring frequency for approval by the Environment Agency.	
	Where the results of this assessment should demonstrate that the environmental risk associated with emissions of ammonia are not insignificant, the operator shall develop and propose a plan to reduce these emissions to non-significance levels and propose an emission limit for approval by the Environment Agency.	
	Where, as a result of IC17, additional ammonia dosing should be selected by the operator as additional abatement technique to promote further reduction of nitrogen oxides in a Selective Non-catalytic Reduction abatement system, the operator shall repeat the risk assessment for ammonia emissions, based on the final configuration of the plant and measurements of ammonia slip and propose an emission limit for approval by the Environment Agency.	
	The risk assessment report (or reports) submitted to comply with this improvement condition will require written approval by the Environment Agency.	

Table S1.4 Pre-operational measures for future development					
Reference Operation Pre-operational measures					
PO1	New carbonisation furnace and new Lesni thermal	After completing the commissioning of the new carbonisation furnace and new Lesni thermal oxidiser (emission point A22) introduced by variation EPR/BN7109IH/V008, according to the submitted commissioning plan (document titled 'Commissioning Strategy – August 2019') and before the			

Table S1.4 F	Table S1.4 Pre-operational measures for future development					
Reference	Operation	Pre-operational measures				
	oxidiser (emission	start of the commercial operations of these activities, the operator shall submit a report for approval by the Environment Agency:				
	point A22)	 Confirming the final location of the sampling point for emission point A22 and that this sampling point meets the requirements of Technical Guidance Note M1 'Sampling requirements for stack emission monitoring'; 				
		 Confirming that the new carbonisation furnace, the new thermal oxidiser and the connection of the existing carbonisation furnace to the new thermal oxidiser have been the subject of a HAZOP study as proposed in the application; 				
		 Confirming the successful completion of the commissioning activities for the new carbonisation furnace, the new thermal oxidiser and the connection of the existing carbonisation furnace to the new thermal oxidiser; 				
		 Demonstrating that the commissioning tests have shown that the new thermal oxidiser is capable of consistently operating in compliance with the emission limits set in Table S3.1 for emission point A22; 				
		 Confirming that the old thermal oxidiser (emission point A1) has been decommissioned and will not be used any longer. 				

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

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 [Point A1 on emission sources plan shown in Schedule 7]	Lesni thermal oxidiser	Hydrogen Cyanide	5 mg/m3 [Note 2]	Extractive sample	6 monthly	TGN M22 or as agreed in writing with the Environment Agency
[Note 1]		Oxides of Nitrogen (NO and NO2 expressed as NO2)	1400 mg/m3 [Note 2]	Extractive sample	6 monthly	BS EN 14792 or as agreed in writing with the Environment Agency
		Total Particulates	10 mg/m3 [Note 2]	Extractive sample	6 monthly	BS EN 13284-1 and MID or as agreed in writing with the Environment Agency
		Carbon Monoxide	200 mg/m3 [Note 2]	Extractive sample	6 monthly	BS EN 15058 or as agreed in writing with the Environment Agency
		Class B VOC (expressed as toluene)	10 mg/m3 [Note 2]	Extractive sample	6 monthly	BS EN 12619 or as agreed in writing with the Environment Agency
		Oxygen			Periodic as appropriate to reference	BS EN 14789 or as agreed in writing with the Environment Agency
		Water vapour			Periodic as appropriate to reference	BS EN 14790
A4 [Point A4 on emission sources plan shown in Schedule 7]	Gas flare from CVD furnace no. 9	No parameters set				
A5, A6, A7, A8 and A9	Emergency relief vents	No parameters set				

Table S3.1 Po	oint source emiss	sions to air –	emission limi	ts and monito	oring requireme	nts
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
[Points A5, A6, A7, A8 and A9 on emission sources plan shown in Schedule 7]	from CVD furnaces					
A10, A11, A12 and A13 [Points A10, A11, A12 and A13 on emission	Boilers (individual stacks)	Oxides of Nitrogen (NO and NO2 expressed as NO2)	200 mg/m3	Extractive sample	6 monthly	BS EN 14792 or as agreed in writing with the Environment Agency
sources plan shown in Schedule 7]		Carbon Monoxide	50 mg/m3	Extractive sample	6 monthly	BS EN 15058 or as agreed in writing with the Environment Agency
		Oxygen			Periodic as appropriate to reference	BS EN 14789 or as agreed in writing with the Environment Agency
		Water vapour			Periodic as appropriate to reference	BS EN 14790 or as agreed in writing with the Environment Agency
A14 [Point A14 on emission sources plan shown in Schedule 7]	Cloth cell dust extraction	Total Particulates	No limit set	Extractive sample	Annually	BS EN 13284-1 and MID or as agreed in writing with the Environment Agency
A15 and A16 [Points A15 and A16 on emission sources plan shown in Schedule 7]	Heat treatment facility I & II	Carbon Monoxide	No limit set	Extractive sample	Annually	BS EN 15058 or as agreed in writing with the Environment Agency
A17 and A18 [Points A17 and A18 on emission sources plan shown in Schedule 7]	Heat treatment facility I & II (cooling)	No parameter set				

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A19, A20 and A21 [Points A19, A20 and A21 on emission sources plan shown in Schedule 7]	Machine room dust extraction units	Total Particulates	No limit set	Extractive sample	Annually	BS EN 13284-1 and MID or as agreed in writing with the Environment Agency
A22 [Point A22 on emission sources plan shown in	New Lesni thermal oxidiser	Hydrogen Cyanide	5 mg/m3 [Note 2]	Extractive sample	Monthly [Note 4]	TGN M22 or as agreed in writing with the Environment Agency
Schedule 7]		Oxides of Nitrogen (NO and NO2 expressed as NO2)	1400 mg/m3 [Note 2]	Extractive sample	Monthly [Note 4]	BS EN 14792 or as agreed in writing with the Environment Agency
		Total Particulates	10 mg/m3 [Note 2]	Extractive sample	Monthly [Note 4]	BS EN 13284-1 and MID or as agreed in writing with the Environment Agency
		Carbon Monoxide	200 mg/m3 [Note 2]	Extractive sample	Monthly [Note 4]	BS EN 15058 or as agreed in writing with the Environment Agency
	Class B VOC (expressed as toluene)	10 mg/m3 [Note 2]	Extractive sample	Monthly [Note 4]	BS EN 12619 or as agreed in writing with the Environment Agency	
	Ammonia	[Note 3]	Extractive sample	Monthly [Note 3]	TGN M22 or as agreed in writing with the Environment Agency	
		Oxygen			Periodic as appropriate to reference	BS EN 14789 or as agreed in writing with the Environment Agency

Table S3.1 Po	oint source emiss	sions to air – e	emission limit	s and monito	ring requireme	nts
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
		Water vapour			Periodic as appropriate to reference	BS EN 14790
A23 [Point A23 on emission sources plan shown in Schedule 7]	Mazak dust extraction unit	Total Particulates	No limit set	Extractive sample	Annually	BS EN 13284-1 and MID or as agreed in writing with the Environment Agency
A24, A25 [Point A24, A25 on emission sources plan shown in Schedule 7]	Chiron dust extraction unit	Total Particulates	No limit set	Extractive sample	Annually	BS EN 13284-1 and MID or as agreed in writing with the Environment Agency
A26 [Point A26 on emission sources plan shown in Schedule 7]	Paint spraying booth	No parameter set				

Notes:

- 1. Use of existing Lesni thermal oxidiser emitting through emission point A1 is permitted until completion of commissioning of the new Lesni thermal oxidiser emitting through emission point A22. A1 shall not be used after completion of pre-operational measure PO1.
- 2. Reference condition are: dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 11% dry.
- 3. Emission limit for Ammonia, if required, to be determined upon completion of IC18. Monitoring frequency for this parameter may be amended if agreed in writing by the Environment Agency as part of IC18.
- 4. Monitoring frequency may be reduced with the written agreement by the Environment Agency if the emission levels are proven to be sufficiently stable over the first 18 months of commercial operation of the Lesni Thermal Oxidiser (emission point A22), or longer period. Where the emission levels were demonstrated to be sufficiently stable, the minimum monitoring frequency, after 18 months of operation, shall not be less than one sampling / test every 6 months.

Table S3.2 Point Source emissions to water (other than sewer) – emission limits and monitoring requirements							
Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method	
W1 [Point W1 on emission	Rain water collection to culvert off site	No parameter set					

Table S3.2 Point Source emissions to water (other than sewer) – emission limits and monitoring requirements							
Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method	
sources plan shown in Schedule 7]							

Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site- emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
S1 [Point S1 on emission sources plan shown in Schedule 7]	Boiler blowdown	No parameter set				
S2 [Point S2 on emission sources plan shown in Schedule 7]	Cooling water discharge	No parameter set				
S3 [Point S3 on emission sources plan shown in Schedule 7]	Overflow from cooling water discharge	No parameter set				
S4 [Point S4 on emission sources plan shown in Schedule 7]	Cooling water discharge (new cooling towers)	No parameter set				

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

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, A10, A11, A12, A13, A14, A15, A16, A19, A20, A21, A22, A23, A24, A25	Every 6 months	01/01				

Table S4.2: Annual production				
Parameter	Units			
Brake discs	Number, tonnes			

Table S4.3 Performance parameters				
Parameter	Frequency of assessment	Units		
Operational time of emission sources A4, A5, A6, A7, A8, and A9	Annually	hours		
Water usage	Annually	tonnes		
Raw material used in CVD process: Natural gas, propane, LNG	Annually	tonnes		
Energy usage	Annually	MWh		
Total raw material used	Annually	tonnes		
Total energy usage per tonne of product	Annually	MWh/tonne		
Total waste	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	13/01/2020		
Water usage	Form water usage 1 or other form as agreed in writing by the Environment Agency	13/01/2020		
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	13/01/2020		
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	13/01/2020		

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, ince 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 brea	ch of a limit	
To be notified within 24 hours of detection	n unless otherwise specified be	low
Measures taken, or intended to be taken, to stop the emission		
Time periods for notification following de	tection of a breach of a limit	
Parameter		Notification period
(c) Notification requirements for the dete	ction of any significant adverse	environmental effect
To be notified within 24 hours of detectio	n	
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 submitted as Any more accurate information on the matte	<u> </u>	e
notification under Part A.		
Measures taken, or intended to be taken, to a recurrence of the incident	prevent	
Measures taken, or intended to be taken, to limit or prevent any pollution of the environm which has been or may be caused by the en	ent	
The dates of any unauthorised emissions fro facility in the preceding 24 months.	m the	
Name*		
Post		
Signature		
Date		

^{*} 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 2016 No.1154 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.

"Hazardous property" has the meaning in Annex III of the Waste Framework Directive.

"Hazardous waste" has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005 (as amended).

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

"MCERTS" means the Environment Agency's Monitoring Certification Scheme.

"Medium Combustion Plant" or "MCP" means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW.

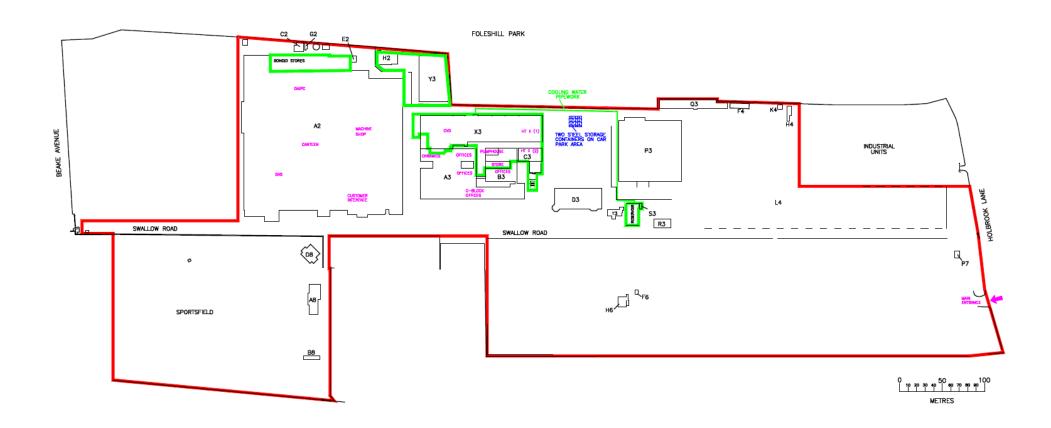
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

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 gas engines or gas turbines, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 15% dry for liquid and gaseous 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.

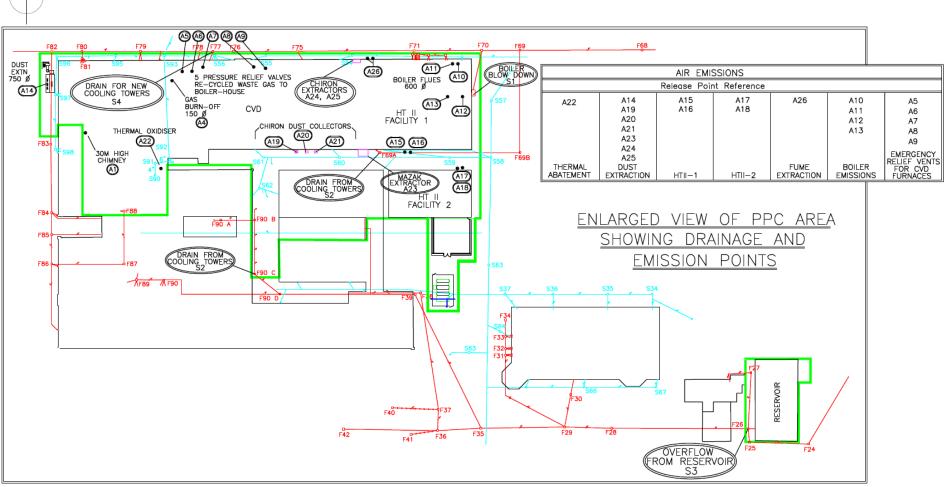
"year" means calendar year ending 31 December.

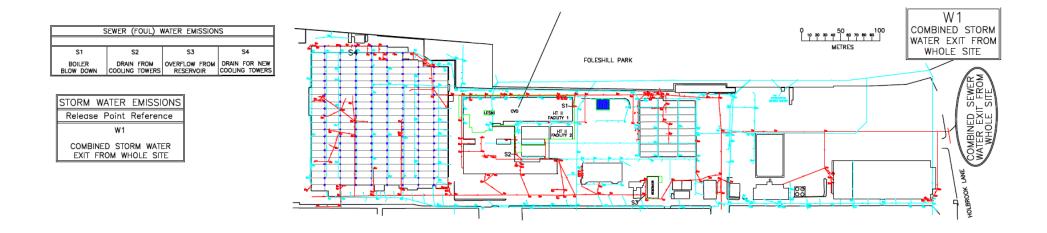
Schedule 7 – Site plan



Emission sources plan







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