

# Notice of variation and consolidation with introductory note

**The Environmental Permitting (England & Wales) Regulations 2016**

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Systagenix Wound Management Manufacturing Limited

Gargrave Foam Dressing Manufacturing Site

Airebank Mill

Gargrave

North Yorkshire

BD23 3RX

**Variation application number**

EPR/SP3535GM/V005

**Permit number**

EPR/SP3535GM

# Gargrave Foam Dressing Manufacturing Site

## Permit number EPR/SP3535GM

### 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 operator is transferring equipment and operations from their site in Dunstable to Airebank Mill. Consequently this variation adds a new production line for the manufacture of adhesive coated foam products. The line comprises two sections known as Coater 1A (foam production) and Coater 1B (adhesive coating). Chemicals (powders and liquids) are combined to form a liquid mixture, either polyurethane (PU) or polyvinylchloride (PVC) and then pumped to the head of Coater 1A. Here the mixture is applied to casting papers via a knife-over roller and transferred to a drying oven. On exiting the oven, the product is cooled on chilled rollers before either passing directly to Coater 1B or being wound onto bulk rolls as an intermediate product. Adhesive ingredients, which are all pre-formulated, are pumped directly to the head of Coater 1B. The adhesive is then applied to the foam paper, which then passes through a second drying oven.

As with the operator's existing foam production process, Coater 1A is permitted under Section 4.1 A(1)(viii) of EPR2016:

Section 4.1 A(1)(viii)      Producing organic chemicals such as plastic materials (for example polymers, synthetic fibres and cellulose-based fibres)

The majority of the output from Coater 1A is directly fed into Coater 1B; Coater 1B is therefore permitted as a directly associated activity to Coater 1A as well as falling under Section 6.4 B(a)(iv) of EPR2016:

Section 6.4 B(a)(iv)      A process for applying to a substrate, or drying or curing after such application, coating material where the process may result in the release into the air of particulate matter or of any volatile organic compound and is likely to involve the use in any 12-month period of 5 or more tonnes of organic solvents

Annual solvent consumption for the new activities is estimated to be approximately 28 tonnes and the adhesive coating activity (Coater 1B) falls under Schedule 14 of EPR2016 (solvent emission activities). The operator is therefore required to submit an annual solvent management plan in order to demonstrate compliance with the requirements of the Industrial Emissions Directive.

Volatile organic compounds (VOC) emissions arise principally from the drying of the adhesive coating, but also from the drying of PU foams, as a result of organic solvent use.

Off-gases from both coater lines are drawn to a common abatement plant (regenerative thermal oxidiser – RTO) with final release to atmosphere at a new emission point A4.

As a result of the new activities the installation boundary is extended to include:

- Building extension to accommodate new activity
- A relocated hazardous waste area
- New chemical storage units.

The operator's registered office address is updated to reflect the record held at Companies House.

The installation is located within the Systagenix Wound Management site at Airebank Mill in Gargrave, North Yorkshire. It is bounded to the south by the River Aire and to the east by Eshton Beck. Beyond the water courses and around the remainder of the site lies agricultural land. The town of Gargrave is located 0.5 km to the west of the site.

There are three European designated conservation sites within 10 km of the installation: North Pennine Moors Special Area of Conservation (SAC)/Special Protection Area (SPA), Craven Limestone Complex SAC and North Pennine Dales Meadows SAC. There are eight Ancient Woodlands (AW) within 2 km of the installation. The closest is Rom Side/Lords Wood approximately 1.2 km to the North East of the site.

The operator currently produces polyurethane foam for use in medical dressings. The foam components are mixed and then spread onto a casting bed, where it is cured and passed through an oven. The foam is then incorporated into medical dressings which are assembled and packed for despatch.

Emissions to air from this process comprise isocyanates and volatile organic compounds from emission points A1 (hydropolymer manufacturing line), A2 (pre-polymer product preparation room) and A3 (methanol store).

Process waste water arising from the reverse osmosis de-ionisation plant is discharged to sewer at emission point S1. Uncontaminated surface water from the site is discharged to Mill Race, which flows to the River Aire, at emission point W1.

The site operates under a Climate Change Levy Agreement and in accordance with an ISO14001 accredited environmental management system.

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.

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application NP3230LC	Duly made 11/04/2006	
Additional information received	Requested on: 16/08/2006 and 19/09/2006	Responses received: 12/09/2006, 13/09/2006, 11/10/2006, 17/10/2006 and 18/10/2006
Permit determined NP3230LC/A001	15/11/2006	
Transfer application SP3535GM/T001	Duly Made 07/10/2008	
Transfer notice determined	27/11/2008	
Application EPR/SP3535GM/V002	Duly Made 26/10/2012	
Variation notice EPR/SP3535GM/V002 determined	20/12/2012	
Agency variation determined EPR/SP3535GM/V003	26/02/2014	Agency variation to implement the changes introduced by IED
Application EPR/SP3535GM/V004	Duly made 15/12/2014	Variation to include a regenerative thermal oxidiser
Variation determined EPR/SP3535GM/V004	17/02/2015	Varied permit issued

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application EPR/SP3535GM/V005 (variation and consolidation)	Duly made 28/10/2019	Application to vary and update the permit to modern conditions.
Additional information received Response to email dated 14/02/2020	Response received 20/02/2020	Confirmation that all adhesives used in Coater 1B are pre-formulated and that drainage alterations outlined in application have not been undertaken.
Variation determined EPR/SP3535GM	01/04/2020	Varied permit issued.

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/SP3535GM

### Issued to

**Systagenix Wound Management Manufacturing Limited** (“the operator”)

whose registered office is

**997 Manchester Road**

**Ashton-Under-Lyne**

**Lancashire**

**OL7 0ED**

company registration number 06682392

to operate a regulated facility at

**Gargrave Foam Dressing Manufacturing Site**

**Airebank Mill**

**Gargrave**

**North Yorkshire**

**BD23 3RX**

to the extent set out in the schedules.

The notice shall take effect from 01/04/2020

Name	Date
Sifelani Mpofu	01/04/2020

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/SP3535GM**

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/SP3535GM/V005 authorising,

**Systagenix Wound Management Manufacturing Limited** (“the operator”),

whose registered office is

**997 Manchester Road  
Ashton-Under-Lyne  
Lancashire  
OL7 0ED**

company registration number 06682392

to operate an installation

**Gargrave Foam Dressing Manufacturing Site  
Airebank Mill  
Gargrave  
North Yorkshire  
BD23 3RX**

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

Name	Date
Sifelani Mpofo	01/04/2020

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 following activities referenced in schedule 1, table S1.1: AR2, AR3 and AR7 shall not be brought into operation until the measures specified in schedule 1 table S1.4 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 Total annual emissions of a substance listed in schedule 3 table S3.4 shall not exceed the relevant limit in table S3.4.
- 3.1.4 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, 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.
- 4.2.5 The operator shall submit an annual solvent management plan in order to demonstrate compliance with the requirements of the Industrial Emissions Directive, by 31 January each year in respect of the previous year.

## 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.
- 4.3.7 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

<b>Table S1.1 activities</b>			
<b>Activity reference</b>	<b>Activity listed in Schedule 1 of the EP Regulations</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
AR1	Section 4.1 A(1)(a)(viii) Producing organic chemicals such as - plastic materials (for example polymers, synthetic fibres and cellulose-based fibres)	Production of polyurethane foams for use in medical dressings	From receipt of raw materials, production of foam to storage of waste materials
AR2	Section 4.1 A(1)(a)(viii) Producing organic chemicals such as - plastic materials (for example polymers, synthetic fibres and cellulose-based fibres)	Production of polyurethane or polyvinylchloride foam (Coater 1A)	From receipt of raw materials to transfer of product either to intermediate bulk rolls to Coater 1B  Includes mixing, pumping and application of chemicals, drying and cooling of foam, cleaning of equipment and storage of raw and waste materials
AR3	Section 6.4 B(a)(iv) Unless falling within Part A(1) or Part A(2) of this Section or Part A(2)(c) of Section 2.1, any process (other than for the re-painting or re-spraying of, or of parts of, aircraft or road or railway vehicles) for applying to a substrate, or drying or curing after such application, printing ink or paint or any other coating material as, or in the course of, a manufacturing activity, where the process may result in the release into the air of particulate matter or of any volatile organic compound and is likely to involve the use in any 12-month period of— (iv) 5 or more tonnes of organic solvents in respect of any activity not mentioned in subparagraph (iii)	Production and application of coating adhesive (Coater 1B)	From receipt of raw materials and substrate to production of coated product  Includes mixing, pumping and application of chemicals and drying of product, cleaning of equipment and storage of raw and waste materials
<b>Directly Associated Activity</b>			
AR4	Dressing assembly and storage area	Assembling medical dressings	Use of polyurethane foam in medical dressings
AR5	Water de-ionisation	De-ionisation of water	De-ionisation of water for use in the listed activity
AR6	VOCs abatement	Use of two regenerative	From receipt of exhaust gas to

<b>Table S1.1 activities</b>			
<b>Activity reference</b>	<b>Activity listed in Schedule 1 of the EP Regulations</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
		thermal oxidisers to abate emissions of VOCs	emissions to air via release points A1 and A4
<b>Activity reference</b>	<b>Activity listed in Schedule 14 of the EP Regulations</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
AR7	Schedule 14 Solvent Emission Activity	Adhesive coating activities in accordance with Annex VII Part 1 of Directive 2010/75/EU	From receipt of solvent to collection of waste solvent or discharge to atmosphere

<b>Table S1.2 Operating techniques</b>		
<b>Description</b>	<b>Parts</b>	<b>Date Received</b>
Application	The response to section 2.1 and 2.2 in the Application	11/04/2006
Response to request for additional information Requested 16/08/2006	Response to questions 3 and 4 regarding site chemical storage onsite zoning	12/09/2006
Response to request for additional information Requested 19/09/2006	Response to question regarding changes in chemical storage on site	18/10/2006
Application for variation EPR/SP3535GM/V004	Parts C2 and C3 of the application documents and all associated supporting information.	15/12/2014
Variation application EPR/SP3535GM/V005	Application forms Parts C2 and C3 and all associated supporting information.	14/08/2019
Response to email – request for further information dated 14/02/2020	Confirmation that all adhesives used in Coater 2 are pre-formulated.	20/02/2020

<b>Table S1.3 Improvement programme requirements</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
IC1	<p>A written plan shall be submitted to the Agency for approval detailing the results of a survey of hard-standing, kerbing and secondary containment for the waste drum storage yard and the measures needed to comply with the requirements of section 2.2.5 of TGN S4.02. Where appropriate the plan shall contain dates for the implementation of individual measures. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the plan.</p> <p>The plan shall be implemented by the operator from the date of approval by the Agency.</p>	Completed

<b>Table S1.3 Improvement programme requirements</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
IC2	The operator will install bunding that meets the requirements of section 2.2.5 of TGN S4.02 for all chemicals stored or used (including process tanks) within the main production area of the installation.	Completed
IC3	<p>The operator shall investigate the best available techniques for containment of firewater on site with reference to section 2.8 of TGN S4.02. A written report detailing all the techniques identified and the option chosen (with justification) shall be submitted to the Agency for approval. The report shall include a timetable for implementation of the improvements identified. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report.</p> <p>The report shall be implemented by the operator from the date of approval in writing by the Agency.</p>	Completed
IC4	<p>The operator shall develop procedures in relation to integrity testing of subsurface structures and bunding with regard to Section 2.2.5 of Environment Agency TGN S4.02. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the procedure.</p> <p>The procedure shall be implemented by the operator from the date of approval in writing by the Agency</p>	Completed
IC5	The operator shall install a shut off valve at W1. Written confirmation shall be supplied to the Agency on completion of the work.	Completed
IC6	<p>The operator shall ensure that the installation's Environmental Management System (EMS) meets all the aspects of Section 2.3 of Sector Guidance Note IPPC S4.02, April 2003 and make changes to the EMS accordingly.</p> <p>A written report detailing any changes made to the EMS 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.</p>	Completed
IC7	The operator shall submit a report to the Environment Agency demonstrating that the bioreactor has been commissioned and emissions from release point A1 are within the ELVs set in Table S 4.1.	Completed
IC8	<p>The operator shall carry out a monitoring study to verify the assumptions made in application EPR/SP3535GM/V005 in relation to the releases of pollutants to air via emission point A4 during normal operation, having regard to the Environment Agency guidance Monitoring emissions to air, land and water (MCERTS) published 07 April 2014, last updated 19 December 2019.</p> <p>As a minimum, two separate monitoring campaigns in a year shall be completed (one monitoring survey six months following commissioning of the coater lines and RTO).</p> <p>The pollutants to be monitored shall include:</p> <ul style="list-style-type: none"> <li>• Speciated total volatile organic compounds</li> <li>• oxides of nitrogen</li> <li>• carbon monoxide.</li> </ul>	Within 12 months of effective date of notice V005, or otherwise agreed in writing by the Environment Agency.



<b>Table S1.3 Improvement programme requirements</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
	The monitoring reports shall be submitted in writing to the Environment Agency for review.	
IC9	<p>Following the completion of IC8, if the results of the monitoring study are higher than those provided in the application assessment, the operator shall undertake an environmental impact risk assessment of all point source releases to air to demonstrate that the emissions will not result in a significant impact. The assessment shall use the information obtained through the emissions monitoring undertaken for IC8.</p> <p>The environmental impact risk assessment shall, as a minimum, include:</p> <ul style="list-style-type: none"> <li>• reports showing details of the monitoring undertaken and the results obtained;</li> <li>• results of the assessment of long and short term impacts from the emissions in accordance with Environment Agency guidance – Air emissions risk assessment for your environmental permit, published 01 February 2016, last updated 02 August 2016; and</li> <li>• a completed H1 assessment, or equivalent.</li> </ul> <p>In the event emissions cannot be screened out as insignificant using the H1 assessment criteria, the operator shall undertake detailed modelling in accordance with Environment Agency guidance - Environmental permitting: air dispersion modelling reports, published 01 November 2014, last updated 24 May 2019.</p> <p>The environmental impact risk assessment report and all associated monitoring reports and assessments shall be submitted in writing to the Environment Agency for review.</p> <p>If the environmental impact risk assessment shows potential long or short term impacts from the emissions, the operator shall submit an action plan to the Environment Agency for review. The action plan shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>• proposals for amendments to existing procedures and/or for the implementation of additional measures to reduce the impacts of the substances identified; and</li> <li>• a proposed timetable for completion of any changes or works.</li> </ul> <p>The operator shall implement any necessary improvements to a timetable agreed in writing with the Environment Agency.</p>	<p>Within 15 months of effective date of notice V005, or otherwise agreed in writing by the Environment Agency.</p>

<b>Table S1.4 Pre-operational measures for future development</b>		
<b>Reference</b>	<b>Operation</b>	<b>Pre-operational measures</b>
PO1	Commissioning of infrastructure for Coaters 1A and 1B	<p>At least four weeks before commencement of commissioning of Coaters 1A and 1B, the operator shall provide a written commissioning plan, including timescales for completion, for approval by the Environment Agency.</p> <p>The commissioning plan shall include, but is not limited to the following:</p>

<b>Table S1.4 Pre-operational measures for future development</b>		
<b>Reference</b>	<b>Operation</b>	<b>Pre-operational measures</b>
		<ul style="list-style-type: none"> <li>• the expected emissions to the environment during the different stages of commissioning,</li> <li>• the expected durations of each stage of the commissioning activities and the actions to be taken to protect the environment,</li> <li>• any sampling and testing to be undertaken, and</li> <li>• the mechanism for reporting to the Environment Agency in the event that actual emissions exceed the expected emissions.</li> </ul> <p>Commissioning shall be carried out in accordance with the commissioning plan as approved.</p>

## 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 5 on site plan reference: MERS/MSE/38 35-4, dated 31/07/2019]	Hydropolymer manufacturing line via thermal oxidiser	Total volatile organic compounds (expressed as carbon)	75 mg/m <sup>3</sup>	Hourly average (minimum 30 minute sampling time)	Annual	BS EN 12619
		Isocyanates	50 µg/m <sup>3</sup>	Instantaneous sample	Annual	US EPA CTM 36 (sampling), CTM 36 A (analysis)
A2 [Point 6 on site plan reference: MERS/MSE/38 35-4, dated 31/07/2019]	TDI pre-polymer product preparation room	Isocyanates	50 µg/m <sup>3</sup>	Instantaneous sample	Annual	US EPA CTM 36 (sampling), CTM 36 A (analysis)
		Total Volatile Organic compounds (expressed as carbon)	75 mg/m <sup>3</sup>	Hourly average (minimum 30 minute sampling time)	Annual	BS EN 12619
A3 [Point 7 on site plan reference: MERS/MSE/38 35-4, dated 31/07/2019]	Methanol store	Total volatile organic compounds (expressed as carbon)	75 mg/m <sup>3</sup>	Hourly average (minimum 30 minute sampling time)	Annual	BS EN 12619
A4 [Point 8 on site plan reference: MERS/MSE/38 35-4, dated 31/07/2019]	Coater 1A and Coater 1B via RTO stack	Total volatile organic compounds (expressed as carbon)	50 mg/m <sup>3</sup>	Hourly average (minimum 30 minute sampling time)	Annual	BS EN 12619

<b>Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements</b>						
<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (incl. unit)</b>	<b>Reference Period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
W1 [Point 9 on site plan reference: MERS/MSE/3835-4, dated 31/07/2019] emission to Mill Race flowing to the River Aire	Uncontaminated surface water	No parameters set	-	-	-	-

<b>Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements</b>						
<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (incl. Unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
S1 [Point 10 on site plan reference: MERS/MSE/3835-4, dated 31/07/2019] emission to on-site effluent treatment plant	Domestic effluent, water de-ionisation plant	No parameters set	-	-	-	-

<b>Table S3.4 Annual limits</b>		
<b>Substance</b>	<b>Medium</b>	<b>Limit (including unit)</b>
Solvents (fugitive releases)	Air	5-15 tonnes solvent input per year - fugitive emission limit value: 25 percent of solvent input.
		>15 tonnes solvent input per year - fugitive emission limit value: 20 percent of solvent input.

## Schedule 4 – Reporting

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

<b>Table S4.1 Reporting of monitoring data</b>			
<b>Parameter</b>	<b>Emission or monitoring point/reference</b>	<b>Reporting period</b>	<b>Period begins</b>
Emissions to air Parameters as required by condition 3.5.1.	A1, A2, A3, A4	Every 12 months	1 January

<b>Table S4.2: Annual production/treatment</b>	
<b>Parameter</b>	<b>Units</b>
Foam	tonnes

<b>Table S4.3 Performance parameters</b>		
<b>Parameter</b>	<b>Frequency of assessment</b>	<b>Units</b>
Water usage	Annually	m <sup>3</sup>
Energy usage	Annually	MWh
Total raw material used	Annually	tonnes
Fugitive emissions as a percentage of solvent input	Annually	-

<b>Table S4.4 Reporting forms</b>		
<b>Media/parameter</b>	<b>Reporting format</b>	<b>Date of form</b>
Air	Form air 1 or other form as agreed in writing by the Environment Agency	01/04/2020
Water usage	Form water usage 1 or other form as agreed in writing by the Environment Agency	26/10/2006
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	26/10/2006
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	01/04/2020

# 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	

<b>(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution</b>	
<b>To be notified within 24 hours of detection</b>	
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>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

<b>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Measures taken, or intended to be taken, to stop the emission	

<b>Time periods for notification following detection of a breach of a limit</b>	
<b>Parameter</b>	<b>Notification period</b>

<b>(c) Notification requirements for the detection of any significant adverse environmental effect</b>	
<b>To be notified within 24 hours of detection</b>	
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 soon as practicable

Any more accurate information on the matters for notification under Part A.	
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	

\* 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.

“emissions to land” includes emissions to groundwater.

“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.

“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.

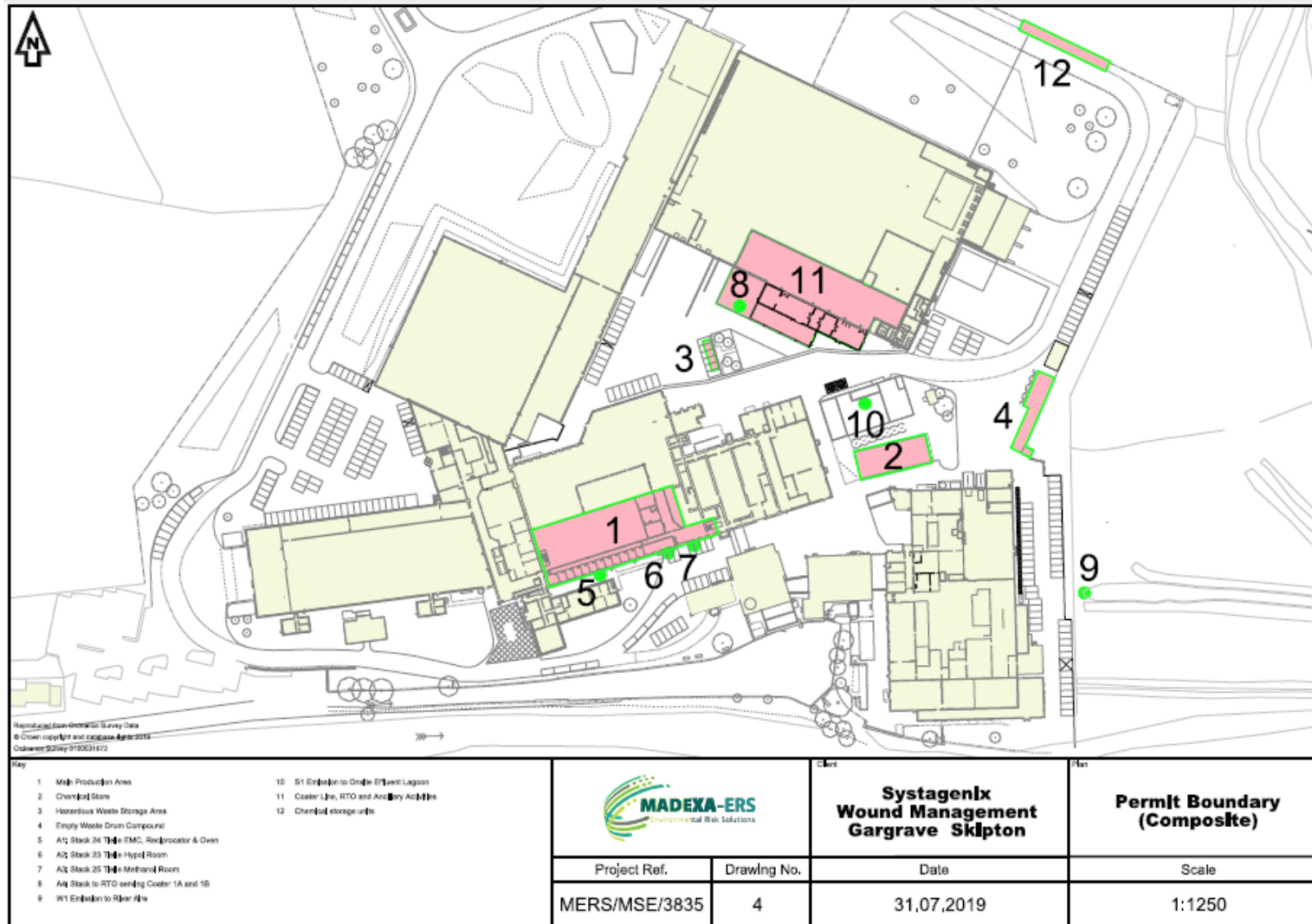
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

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



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END OF PERMIT

Permit number  
EPR/SP3535GM