Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Steelstrip Services Limited

Servosteel
Pensnett Road
Dudley
West Midlands
DY1 2HA

Variation application number

EPR/KP3732PL/V004

Permit number

EPR/KP3732PL

Servosteel
Permit number EPR/KP3732PL

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 variation changes are as follows:

- Addition of new chemical process schedule activity S4.2 A (1) (a) (iv) production of inorganic salts for ferrous chloride production. In main utilising existing facilities within existing installation boundary. New facilities include three new process vessels within current facility bund. A reactor (8cum3) to dissolve the steel, a base tank (18cum3) for heating the hydrochloric acid/ferrous chloride mixture and hot water tank. Main process emission is hydrogen chloride which is vented via existing A1 emission point.
- Updating company name and registered address; company registration number and hence legal entity is unchanged.
- Activities table S1.1 has been updated with new chemical scheduled activity and the main 2.3 A (1) (a) activity is unchanged with this variation (opportunity taken to define installation vat volume capacity in m3). The table includes the addition of a scheduled activity S5.3 A(1) (a) (ii) updated to reflect historic effluent treatment , previously listed as a directly associated activity but in reality above scheduled activity threshold of 10 tonnes per day treatment capacity.
- There are no new emissions to sewer or surface water with this variation application
- Table S1.3 improvement programme table has been updated to clarify all improvement programme now completed.
- Monitoring and reporting requirements have been updated to confirm removal of requirement for cadmium and mercury monitoring and associated annual emission limit value assessments.S1 flow monitoring requirement in original permit KP3732PL has now started after successful completion of relevant improvement condition IC13.

Installation

The surface treatment installation is operated by Steelstrip Services Limited. The grid reference for the centre of the site is SO 92274 89120, based in Dudley, West Midlands.

Activities

There are three specific scheduled activity linked to this installation as follows:

- S2.3 Part A(1) (a) Surface treating of metals
- S4.2 Part A(1) (a) (iv) Inorganic chemical production of salts
- S5.3 Part A (1) (a) (ii) Disposal of hazardous waste.

The key activity performed is surface treatment of metals by chemical means, via a Coil Pickle Line. The Coil Pickle Line is used to immerse Hot Rolled Steel Coils in Hydrochloric Acid heated to 80 centigrade, which has the purpose of chemically dissolving iron oxide scale which is formed during steel manufacture and subsequent storage. The Ferrous Chloride that is produced is a co-product of the pickling process

Ferrous Chloride production involves usage of a reactor (8cum3) to dissolve the steel, a base tank (18cum3) for heating the hydrochloric acid/ferrous chloride mixture and hot water tank. Hydrochloric Acid is circulated over steel to produce Ferrous Chloride. Additionally there is a small water tank to aid with pre-heating of the water. These three vessels will all be located within the large process bund of the Coil Pickle Line.

There is one SAC habitat site within 10 km of the installation, four Sites of Special Scientific Interest within 2km and thirty nine other conservation sites within 2 km.

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 PPC/KP3732PL	15/07/04	-
Response to request for information dated 06/09/04	Response received 11/10/04	-
Response to request for information dated 16/09/04	16/09/04	-
Response to request for information dated 06/10/04	29/10/04	-
Response to request for information dated 11/11/04	26/11/04	-
Response to request for information dated 07/12/04	05/01/05	-
Response to request for information dated 03/02/05	03/02/05	-
Request to extend determination dated 15/11/04	Response received 19/11/04	-
Request to extend determination dated 17/01/05	18/01/05	-
Permit determined	10/02/05	-
Variation application EPR/KP3732PL/V002	Duly made 10/07/09	Application to add six ferrous chloride storage tanks.
Response to request for further information dated 12/11/09	17/11/09	-
Variation issued	10/12/09	-
Variation application EPR/KP3732PL/V003	Duly made 05/09/17	Application for the addition of extra storage capacity for Ferrous Chloride and update of company name.
Variation determined EPR/KP3732PL (PAS Ref. PP3531YF)	27/09/17	Varied permit issued.

Status log of the permit		
Description	**Date**	**Comments**
Variation application EPR/KP3732PL/V004	Duly made 18/08/21	
Variation determined EPR/KP3732PL (PAS Ref WP3508SQ)	15/10/21	Variation 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/KP3732PL

Issued to

Steelstrip Services Limited ("the operator")

whose registered office is

Servosteel
Pensnett Road
Dudley
West Midlands
DY1 2HA

company registration number **04797346**

to operate a regulated facility at

Servosteel
Pensett Road
Dudley
West Midlands
DY1 2HA

to the extent set out in the schedules.

The notice shall take effect from 15/10/2021

Name	**Date**
Anne Lloyd	**15/10/21**

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/KP3732PL

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/KP3732PL/V004

authorising,

Steelstrip Services Limited (“the operator”)

whose registered office is

Servosteel
Pensnett Road
Dudley
West Midlands
DY1 2HA

company registration number **04797346**

to operate a regulated facility at

Servosteel
Pensett Road
Dudley
West Midlands
DY1 2HA

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

Name	**Date**
Anne Lloyd	**15/10/2021**

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, so far as is reasonably practicable, including those risks 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 the permit.

1.2 Energy efficiency

1.2.1 The operator shall:

(a) take appropriate measures to ensure that energy is used efficiently in the activities; and

(b) maintain records of fuel and energy consumption used in the activities;

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; and

(b) maintain records of raw materials and water used in the activities;

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

1.4.1 The operator shall take appropriate measures to ensure that the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities and that;

(a) 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

(b) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

2 Operations

2.1 Permitted activities

2.1.1 The only activities authorised by the permit are the activities specified in schedule 1 table S1.1 (the “activities”).

2.2 The site

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

2.3 Operating techniques

2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.

2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation ("plan") specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan , and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.

2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.

2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:

(a) the nature of the process producing the waste;

(b) the composition of the waste;

(c) the handling requirements of the waste;

(d) the hazardous property associated with the waste, if applicable; and

(e) the waste code of the waste.

2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 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.

3.4.2 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 and S3.2 unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Reporting

4.1.1 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 March (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 performance parameters set out in schedule 4 table S4.2 using the forms specified in table S4.3 of that schedule.

4.1.2 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 S4.3 ; and

(c) giving the information from such results and assessments as may be required by the forms specified in those tables.

4.1.3 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 Notifications

4.2.1 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.

4.2.2 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.

4.2.3 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.

4.2.4 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.

4.2.5 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.

Schedule 1 Operations

Table S1.1 activities			
Activity reference	**Activity listed in Schedule 1 of the EP Regulations**	**Description of specified activity**	**Limits of specified activity**
A1	S2.3 Part A(1)(a)	Surface treating of metals using an electrolyte or chemical process where the aggregated volume of the treatment vats is more than 30m3.	From receipt of raw materials to assembly of surface treated finished parts and despatch of finished parts. Total installation vat volume capacity **66 m3**
A2	S4.2 Part A(1) (a) (iv)	Inorganic chemical production : Ferrous chloride chemical production	From receipt of raw materials to dispatch of products from site
A3	S5.3 Part A (1) (a) (ii)	Treatment of hazardous waste for disposal with a capacity exceeding 10 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC concerning urban waste-water treatment—physico-chemical treatment	From receipt and storage of effluent, effluent treatment, recycling of cleaned water and final effluent despatch from site. **Total treatment capacity 172.8 m3 per day (7.2 m3 per hour)**
	Directly Associated Activity		
A4	Directly associated activity	Discharge of surface water	From collection to dispatch into site surface drain and removal from site
A5	Directly associated activity	Handing and dispatch of wastes	From generation of waste to dispatch off site
A6	Directly associated activity	Combustion Plant < 20 MW thermal input capacity	From receipt of fuels to emission of combustion gases.

Table S1.2 Operating techniques		
Description	**Parts**	**Date Received**
Application KP3732PL	The response to question 2.1 and 2.2 given in section 2.3 (page 18-31) and 2.4 (page 32) of the application.	15/07/04
Application KP3732PL	Section 2.10.1.2 of the application.	15/07/04
Further information (Document Reference Servo02/10)	Figure 1 (Issue 1, 10/09/2004), ‘’Abatement Scrubber, Monitoring and Control – Servosteel Dudley’’	11/10/04
Application for Variation EPR/KP3732PL/V002	Responses provided in sections C1b, C1c, C1h, C2a, C2b, C6a - f and Appendix 3 of the application and technical report (Document Reference Servo02/01).	26/06/09
Response to Request for further information	Further information provided identifying: • Surface water drainage systems • Spill diverter arrangements • Accident Management Plan • Environmental Risks and Prevention Measures - Spill Response Procedure.	17/11/09

Table S1.2 Operating techniques		
Description	**Parts**	**Date Received**
Application Variation EPR/KP3732PL/V003	Response to questions on application form C3, Questions 3a, 3c (operating techniques), and 6c (Climate Change Agreement)	11/07/17
Response to request for further information dated 23/08/17	Response to question 1b in relation to the following: • Site Protection and Monitoring Programme (SPMP)	05/09/17
Variation Application EPR/KP3732PL/V004	Application forms C2 and C3 plus all referenced supporting documents and all duly making responses	Duly Made 18/08/21

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
IC1	The operator shall submit to the Agency written procedures for the control of raw material deliveries/collections from the installation, and for accidents associated with these activities.	Complete
IC2	The operator shall submit to the Agency details of the proposed improvements to the bulk acid storage area and agree with the agency the timetable for implementation.	Complete
IC3	The operator shall submit to the agency in writing describing the operation of the caustic scrubber abatement system leading to air emission point A1 including, but not limited to, a justification of the pH control range of the scrubber liquor. The report shall also include proposals for methods of monitoring, frequency of recording and reporting parameters from the abatement system (e.g. pH of scrubber solution, liquor flow) to demonstrate effective control of the abatement system. Any improvements identified and timetables for implementation should be included in the report to be agreed with the Agency.	Complete
IC4	The operator shall provide a written report to be agreed with the Agency, describing the monitoring, logging system and calibration of the Cerebus Stack Gas Monitor system for hydrogen chloride associated with the caustic scrubber abatement system leading to air emission point A1. The report shall also include details of a programme for monitoring this data, to a frequency and procedure to be agreed with the Agency, for a period of no less than 6 months.	Complete
IC5	Obtain full ISO14001 certification for the operators EMS as detailed on the application.	Complete
IC6	The operator shall provide in writing to be agreed with the Agency a methodology for the identification of hazards associated with the installation and activities. The operator shall provide to the Agency in writing, based on the hazard identification above, a revised accident management and mitigation plan.	Complete
IC7	The operator shall submit in writing to the Agency details of procedures and methods used to ensure that the bulk acid storage tank is restricted to 80% of storage capacity.	Complete
IC8	The operator shall provide to the Agency a report detailing the measures and techniques employed to minimise air emissions at source from the acid pickling tanks and justification for their use (referring to IPPC S2.07). Where necessary the report shall include details of upgrading or replacement of techniques where feasible and a plan detailing the timetable for implementation. The operator shall complete the improvements identified in the report to the timetable agreed with the Agency.	Complete
IC9	The operator shall provide to the Agency a written report detailing improvements to the rinse techniques used and also the installation effluent treatment unit in terms of reducing both the water usage and emissions to sewer. The report shall include justification for the techniques used (with reference to IPPC S2.07) and where necessary the report should also include the details for upgrading or replacement of these. The report shall provide a plan with time-scales for the implementation of the improvements identified that shall be agreed by the Agency in writing. The report shall include details of the proposed baselines to be developed as part of the EMS for water use, raw materials and the generation of waste as described in Appendix 8 of the Application. This report shall also make reference to items identified as Waste Minimisation Opportunities in the 'Further Information' as part of the Application. The operator shall complete the improvements identified in the report to the timescales agreed with the Agency.	Complete

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
IC10	The operator shall provide to the Agency a copy of the Energy Efficiency Plan and agree with the Agency the timetable for implementation.	Complete
IC11	The operator shall submit a written procedure to the Agency describing the actions taken to prevent discharges via the water emissions point W1 in the event of an emergency.	Complete
IC12	The operator shall provide to the Agency a noise management plan (to include the provisions for the assessments of the impact of new or replacement equipment at the installation). Where improvements are identified, a written report (including timescales for implementation) shall be submitted to the Agency.	Complete
IC13	The operator shall provide a written report to the Agency on the feasibility of continuous measurement of effluent flow at S1, having regard to EN, ISO and BS standards. This report shall include details of any improvements with a timetable for implementation to be agreed with the Agency. This report shall include an assessment as to how the proposed improvements meet with the requirements given in MCERTS standard 'Minimum requirements for the self-monitoring of effluent flow' version 2, Aug 2004.	Complete
IC14	The operator shall submit a written report to the Agency on the feasibility of continuous measurement of pH on the effluent discharge to water discharge point S1. The report shall include details of any improvements with a timetable for implementation to be agreed with the Agency. This report shall also include an assessment as to how the proposed improvements meet with the performance standards given in MCERTS document 'Continuous Water Monitoring Equipment Part 2, v1 February 2003'.	Complete
IC15	The operator shall submit a written report to the Agency summarising the data from the monitoring programme agreed under IC4 along with details of calibrations, and the results of other intrusive measurements taken for HCL at air emission point A1 during the monitoring period.	Complete
IC16	The operator shall provide a written report to the Agency of the results of an investigation of the potential for the use of filter cake other than landfill. The report shall detail any resulting actions arising from this investigation.	Complete
IC17	Submit a written report to the Environment Agency for approval. The report must contain the following in three parts: (a) Results of integrity testing of the tank farm bund and spill diverter arrangements and associated transfer pipework to and from the storage tanks and identify any improvements required. (b) Results of an assessment of the ability of the spill diverter system, wall and door behind the storage tanks to contain released chemicals and divert the flow to the process bunded area. (c) Details of the inspection regime for the surface water drains in the ferrous chloride storage tanks area, including the inspection and maintenance of the resin sealant. The report shall provide evidence that the resin sealant provides adequate protection for the surface water drains and that the sealant will be maintained to prevent degradation over time. For each part above, the operator shall have regard to indicative BAT requirements given in the following documents: EPR 1.00. How to comply with your environmental permit: Getting the basics right. EPR S2.07. Guidance for the Surface Treatment of Metals and Plastics by Electrolytic and Chemical Processes IPPC S5.06. Guidance for the recovery and disposal of hazardous and non hazardous waste. CIRIA C598 – Chemical Storage Tank Systems – good practice. The report shall identify any improvements required. The report must contain dates for the implementation of individual measures. The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the report.	Complete

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	**Parameter**	**Source**	**Limit (including unit)**	**Reference Period**	**Monitoring frequency**	**Monitoring standard or method**
A1 as on Emission Points at Servosteel DY1 2HA September 2004 " submitted 11/10/04	Hydrogen chloride	Exhaust from caustic scrubber	10 mg/m3	Minimum one hour sample	Every two months or as agreed in writing by the Environment Agency	EN1911 or as agreed in writing by the Environment Agency
A2 as on Emission Points at Servosteel DY1 2HA September 2004 " submitted 11/10/04	No parameters set	Exhaust from boiler house	No limits set	-	-	-

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	**Parameter**	**Source**	**Limit (incl. unit)**	**Reference Period**	**Monitoring frequency**	**Monitoring standard or method**
W1 on "Servosteel Site Drainage Plan; Location of Water and Sewer Emission Points February 2005" Submitted 03/02/05.	No parameters set	Uncontaminated surface water from installation storm water drains	-	-	-	-

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	**Parameter**	**Source**	**Limit (incl. Unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
S1 on "Servosteel Site Drainage Plan; Location of Water and Sewer Emission Points February 2005" Submitted 03/02/05.	Zinc and its compounds, expressed as zinc (Total Zn)	Effluent treatment plant discharge	2 mg/l	Spot sample	Quarterly	
	Flow m3/day		No limit set	Not applicable.	Continuous	Mcerts certified flow meter
	pH		6 -10 (based on weekly average)	Spot sample	Daily	BS ISO 10523 or as agreed in writing by the Environment Agency

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 sewer Parameters as required by condition 3.5.1	S1	Quarterly or as agreed in writing with the Environment Agency	1 January
Emissions to air Parameters as required by condition 3.5.1	A1	Six monthly	1 January

Table S4.2 Performance parameters		
Parameter	**Frequency of assessment**	**Units**
Water usage	Annually	tonnes
Energy usage	Annually	MWh
Waste return	Annually	tonnes

Table S4.3 Reporting forms		
Media/parameter	**Reporting format**	**Date of form**
Sewer	Form sewer 1 or other form as agreed in writing by the Environment Agency	12/02/10
Water usage	Form WU1 or other form as agreed in writing by the Environment Agency	01/01/05
Energy usage	Form E1 or other form as agreed in writing by the Environment Agency	01/01/05

Table S4.3 Reporting forms		
Media/parameter	**Reporting format**	**Date of form**
Waste return	Form R1 or other form as agreed in writing by the Environment Agency	01/01/05

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	

(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	
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 the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be 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.
“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 or background concentration 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 as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“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.

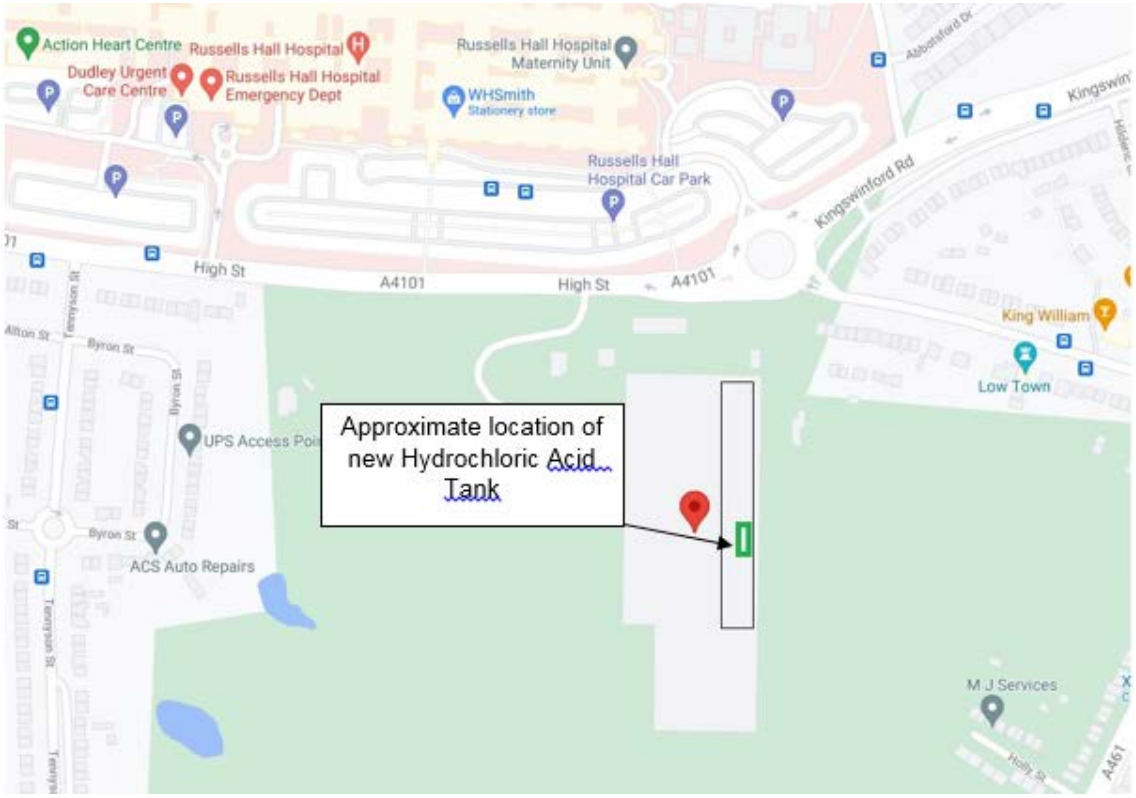
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

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.

Schedule 7 – Site plan

Installation Boundary Plan



END OF PERMIT