

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Robert Stuart Limited

Robert Stuart Plating Shop
10/11 Edinburgh Way
Harlow
Essex
CM20 2DH

Variation application number

EPR/BP4356IN/V005

Permit number

EPR/BP4356IN

Robert Stuart Plating Shop

Permit number EPR/BP4356IN

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. Only the variations specified in schedule 1 are subject to a right of appeal.

Brief Description of the process

The installation will remain as a surface treatment facility with associated on site effluent treatment facilities

The installation is operated by Robert Stuart Limited at a facility in Harlow centred on National Grid Reference TL 46635 12009. Robert Stuart Ltd. occupies a factory located approximately 3 km Northeast of Harlow Town.

The installation consists of the following scheduled activities

- Section 2.3 A1(a) Surface treatment activity, unless falling within Part A(2) of this Section, surface treating metals and plastic materials using an electrolytic or chemical process where the aggregated volume of the treatment vats is more than 30m³.
- Section 5.4 A(1) (a) (ii) Disposal of non-hazardous waste in a facility with a capacity of more than 50 tonnes per day by physico-chemical treatment specifically.

The installation also includes a solvent emission activity under EPR regulations schedule 14 and a total of five directly associated activities

The installation is a specialist in metal coating and finishing activities, offering a variety of finishing services from its site in Harlow, the company is accredited to NADCAP, AS 9100 Rev D, ISO 9001 and ISO 14001. The aggregated volume of treatment tanks within installation for surface treatment activity is 150 m³.

There are two European /Ramsar sites within 10 km of installation, and twenty three other conservation sites within 2 km of installation.

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

Changes introduced by this variation notice

The variation is linked to following key changes

- Addition of a new paint shop within an extension to installation boundary. This has led to addition of 8 new air emissions. The painting activity is a directly associated activity and there are no changes to effluent or surface water discharges from the installation. The old painting plant air emission points are removed.

- Change of vapour degreasing solvent from trike to perchloroethylene. Vapour degreasing system is contained and therefore old A3 air emission is removed.
- Reduction of usage of Hydrogen Fluoride within installation
- Review and updating of S1.1 Activities table to ensure accurate reflection of installation ; this includes confirmation that existing on site non cadmium process effluent treatment plant is a scheduled activity above relevant threshold and not a directly associated activity
- Addition of W6 and W7 uncontaminated surface water discharges linked to new paint shop land extension to installation
- Changes to monitoring and reporting for S1 sewer discharge emission point to remove parameters no longer required to be monitored.

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 BP4356IN (A001) (EPR/BP4356IN/A001)	Duly made 10/08/04	
Permit determined (EPR/BP4356IN/A001)	21/12/04	
Variation UP3237SV (V002) (EP/BP4356IN/V002)	(1)	Admin changes linked to monitoring requirements and improvement condition requirements
Variation issued (EPR/BP4356IN/V002)	01/09/05	
Notified of change of company name (V003)	21/03/13	Name changed to Robert Stuart Ltd.
Variation issued EPR/BP4356IN/V003	19/04/13	Varied permit issued to Robert Stuart Ltd.
Variation application EPR/BP4356IN/V004	Returned, not duly made 16/05/19	Not duly made
Variation application EPR/BP4356IN/V005 plus all supporting documentation and duly making responses	Duly made 17/08/22	Addition of new paint shop
Additional information responses	12/09/22	
Additional information responses	16/09/22	
Additional information responses	20/09/22	
Additional information request responses	20/09/22	
Additional information request responses	20/10/22	
Additional information request responses	12/12/22	
Variation issued EPR/BP436IN/V005 (Billing reference CP3123PK)	02/02/23	Varied and consolidated permit issued

(1) No data available for duly making date

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/BP4356IN

Issued to

Robert Stuart Limited ("the operator")

whose registered office is

10/11 Edinburgh Way

Harlow

Essex

CM20 2DH

company registration number **00398525**

to operate an installation at

Robert Stuart Plating Shop

10/11 Edinburgh Way

Harlow

Essex

CM20 2DH

to the extent set out in the schedules.

The notice shall take effect from 02/02/23

Name	Date
Anne Lloyd	02/02/23

Authorised on behalf of the Environment Agency

Schedule 1

All conditions have been varied by the consolidated permit EPR/BP436IN as a result of the application made by the operator.

The Introduction section was also updated to reflect the changes above

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/BP4356IN

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/BP4356IN/V005 authorising,

Robert Stuart Limited ("the operator"),

whose registered office is

10/11 Edinburgh Way

Harlow

Essex

CM20 2DH

company registration number **00398525**

to operate an installation at

Robert Stuart Plating Shop

10/11 Edinburgh Way

Harlow

Essex

CM20 2DH

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

Name	Date
Anne Lloyd	02/02/23

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 blue 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 substances 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 performance parameters set out in schedule 4 table S4.2 using the forms specified in table S4.3 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 S4.3 ; 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 send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.6 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

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR 1	Section 2.3 A (1) (a)	<p>Surface treating metals and plastic materials using an electrolytic or chemical process where the aggregated volume of the treatment baths are > 30 m3 volume.</p> <p>2.2.1.4 Hard Chrome plating</p> <p>2.2.1.5 chromate conversion coatings</p> <p>2.2.1.6 cyanide based processes, cadmium electroplating, zinc electroplating, copper and silver electroplating, gold electroplating</p> <p>2.2.1.7 cadmium plating</p> <p>A10-1 sulphuric acid anodising</p> <p>A10-2 chromic acid anodising</p> <p>A10-3 barrel plating, zinc plating, nickel plating, tin plating</p> <p>A10-4 cadmium plating including chromate passivation</p> <p>A10-5 Vat Plating, zinc plating, copper plating, nickel plating, tin plating</p> <p>A10-6 precious metals plating, silverplating, copperplating, nickel plating, electroless nickel plating, gold-plating.</p>	From receipt of raw materials and prepared work to despatch of products.
AR 2	Section 5.4 A(1) (a) (ii)	Disposal of non-hazardous waste in a facility with a capacity of more than 50 tonnes per day by physico-chemical treatment specifically.	<p>Limited to aqueous effluent from non-cadmium process areas discharging to foul sewer</p> <p>Treatment capacity peak 300 m3/day based on Thames Water discharge consent limit</p>
Other Activities			
	Activities under Schedule 14 to EP Regulations	Description of specified activity	Limits of specified activity
AR 3	Solvent emission activities	Surface cleaning using substances or preparations which because of their content of volatile organic compounds are assigned or need to carry one or more of the risk phrases R45, R46, R49, R60 or R61 or halogenated VOC's which are	From receipt of raw materials to completion of prepared work; usage of single solvent perchloroethylene.

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
		assigned or need to carry the risk phrase R40. Vapour degreasing using only perchloroethylene solvent above one tonne per annum usage limit.	
Directly Associated Activity			
AR 4	Directly Associated Activity	Stove enamelling / dry film lubrication	From receipt of prepared work to production of finished product.
AR 5	Directly Associated Activity	Mechanical treatment – grit blasting only.	From receipt of raw materials to completion of prepared work.
AR 6	Directly Associated Activity	Storage and disposal of waste	From generation of waste to dispatch off site.
AR 7	Directly Associated Activity	Disposal of surface water	From collection of surface water to dispatch to overflow ditch.
AR 8	Directly Associated Activity	Treatment and disposal of effluent from cadmium process via evaporation.	From receipt of waste to effluent treatment and recycling to surface treatment facilities. Treatment capacity 70 litres/hour

Table S1.2 Operating Techniques		
Description	Parts	Date Received
Original Application BP4356IN (A001)	The response to section 2.1, 2.2,2.9 and 2.10 given in sections 2.2,2.4 ,2,9 and 2.02 of application form	20/04/04
Minor operational change	Layout and number of vat changes linked to plating and anodising tanks with potential change of associated local ventilation.	21/10/08
Variation application EPR/BP4356IN/V005	Application forms and all application supporting documents plus duly making response	Duly made 17/08/22
Additional information request responses	Additional information response	12/09/22
Additional information request responses	Additional information response	16/09/22
Additional information request responses	Additional information response; vapour degreasing containment and mercury emission controls	20/09/22
Additional information request responses	Site drainage plan including W6 and technical information on containment linked to new paint shop area	20/10/22
Additional information request responses	Final site drainage plan including W7	12/12/22

Table S1.3 Improvement programme requirements		
Reference	Description	Date
IC1	<p>The operator shall review the risk assessment for the site specifically with regard to</p> <ul style="list-style-type: none"> - The movement of chemicals and waste around the site - The delivery of materials to the site <p>The risk assessment shall identify the hazard, probability, consequences and measures to reduce the risk</p> <p>The measures to reduce the risk shall include but not be limited to</p> <ul style="list-style-type: none"> - Procedures to protect surface water drains - Redesign of the collection of waste systems in the process area to avoid manual movement of wastes around the site - Redesign of the containment area for the delivery of chemicals <p>The operator will provide the Environment Agency with a written report of this review with a plan with timescales for the implementation of the improvements identified</p>	Complete
IC2	<p>The operator shall provide a report on the proposed remediation works to be carried out to repair cracks in the concrete at the rear of the factory as identified in improvement 18 in Appendix 8 of the application</p> <p>The report shall include a firm timescale when the works will be completed, which shall be agreed in writing with the Environment Agency.</p> <p>The works shall be completed in accordance with agreed timescale</p> <p>Within one month of the completed of the works the operator shall provide a report of the construction quality assurance of the impermeable pavement, which forms the sites containment and drainage systems, which demonstrates it is fit for purpose in its design and construction. The report shall include details of the independent engineer undertaking this assessment</p>	Complete
IC3	<p>The operator shall complete a review of the emissions to sewer, compared to benchmark figures and where these are not met, an investigation into reducing these to meet benchmarks shall be conducted.</p> <p>This investigation shall include, but not be limited to, an investigation into the source of the Cadmium present in the discharge to sewer and proposals for ensuring this is reduced to benchmark levels.</p> <p>The outcome of this review shall be submitted in a report to the Agency and contain a plan with time-scales for the implementation of the improvements identified and shall be agreed in writing with the Environment Agency.</p>	Complete
IC4	<p>The operator shall provide the Environment Agency with a report detailing the proposals for the operator to meet the requirements of the SED regulations as set in improvement condition 11 below.</p>	Complete
IC5	<p>The operator is to review all the sampling and analytical methods and procedures used to monitor discharges to both air and water, with a view to ensuring systems that are acceptable to the Environment Agency are employed. This review should include the methods used both in-house and those employed by external parties and be extended to include the monitoring of surrogate methods which are used to control emissions. The operator shall have regard for the Environment Agency's general guidance on emissions to air, M1 and M2, and for the Environment Agency's sector guidance for surface treatment (IPPC 2.07), and the methods detailed therein.</p> <p>To be acceptable, the methods used must be accepted by MCERTS or UKAS if MCERTS does not cover the system.</p> <p>The operator shall provide the Environment Agency with a written report of this review. Where it is intended to make changes, a firm timescale for these changes should be included in the report. Where potential improved methods are identified as available but it is not proposed to use them, full justification for this must be included in the report.</p>	Complete

Table S1.3 Improvement programme requirements		
Reference	Description	Date
IC6	<p>The operator shall review the potential for minimising emissions to air both via specific emission points and fugitive releases as identified in improvement 14 in Appendix 8 in the application. This review shall cover the use or replacement of abatement equipment, and in terms of releases from tanks should refer to section 2.2.1 of the sector guidance.</p> <p>This review shall also include analysis of xylene, butyl acetate and toluene at local exhaust vents from the spray booths and dry film lubricating equipment. The impact of these emissions shall be quantified using the H1 tool or equivalent.</p> <p>The operator shall provide the Environment Agency with a written report of the reviews. Where it is intended to make improvements, time-scales for the implementation of the improvements should be included in the report.</p> <p>Where potential alternatives are identified as available, but it is not proposed to use them, full justification for this is to be included in the report.</p>	Complete
IC7	<p>The operator shall provide the Environment Agency with a report on the substitution of raw material for less hazardous alternatives as identified as improvements in Appendix 8 of the application and provide a justification where this is not feasible. This report shall include: -</p> <ul style="list-style-type: none"> - The replacement of solvents with aqueous alternatives, or where this is not possible, the substitution by a less hazardous solvent. - The replacement of any substance of any substance (particularly metals) with a less harmful alternative. - The replacement of chromium (VI) as detailed in the sector guidance. <p>Where it is intended to make changes, a firm timescale for these changes should be included in the report.</p>	Complete
IC8	<p>The operator shall undertake a review and provide a cost benefit analysis with regard to the reduction or re-use of metal hydroxide filter cake as identified in improvements 15 and 16 of Appendix 8 of the application. This shall include but not be limited to detail of the monitoring of drainage times on process lines to optimise minimisation of drag out as identified in improvement 5 of Appendix 8 of the application and the use of ion exchange technology.</p> <p>The operator shall provide the Environment Agency with a written report of this review including a plan with timescales for the implementation of the improvements identified.</p>	31/03/24
IC9	<p>The operator shall undertake a review and provide a cost benefit analysis for the re-oxidation of chromium III to chromium VI for re-use. This review shall include the potential use of electrodialysis technology.</p> <p>The operator shall provide the Environment Agency with a written report of this review including a plan with timescales for the implementation of the improvements identified.</p>	Complete
IC10	<p>The operator shall review the rinse techniques used with a view to reduce both the water usage and emissions to sewer as identified as improvements 6 and 7 in Appendix 8 of the application. This review shall include a justification for the techniques used and where necessary include details for upgrading or replacement of these. The operator shall provide the Environment Agency with a written report of this review including a plan with timescales for the implementation of the improvements identified.</p> <p>This report shall also include details and timetables for the installation of water meters on all process lines to check and compare water consumption whilst maintaining adequate rinse ratios as identified in the Appendix 8 of the application.</p>	Complete
IC11	<p>The operator shall provide the Environment Agency with a report confirming that the operator has fully met the requirements of the SED regulations</p>	Complete

Table S1.3 Improvement programme requirements		
Reference	Description	Date
IC12	<p>The operator shall provide the Environment Agency with a report providing an action plan to address site infrastructure improvements for complete installation, with time scales for improvements, and need to cover but not limited to the following aspects:</p> <p>Infra-structure containment measures including secondary and tertiary containments, and proposals for infrastructure improvements, including:</p> <ol style="list-style-type: none"> 1) The identification of any compromised infrastructure, including cracked concrete/infrastructure, incompatible infrastructure containment measures etc (for all raw materials used on site and wastes produced by the permitted processes), 2) The identification of compatible infrastructure improvements, 3) The review of infrastructure strength for vehicular movements, with time scales for improvements. <p>The report shall include details of the compatibility of materials to be used on the infrastructure improvements, and its suitability in relation to raw materials used on site and wastes produced by the permitted processes</p> <p>The operator shall submit such an action plan for approval in writing by the Environment Agency</p>	30/04/23
IC13	<p>The operator shall provide the Environment Agency with a report providing evidence of completion of action plan linked to IC12 as approved in writing by the Environment Agency and to the timescales agreed.</p> <p>The operator shall submit such a report for approval in writing by the Environment Agency.</p>	Two months after completion of work and within timescale agreed by the Environment Agency for compliance with IC12

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 (1)	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 (Point 1 on air emissions plan 1 in schedule 7)	Alkaline descaler	No parameters set	No limits	-	-	-
A2 (Point 2 on air emissions plan 1 in schedule 7)	Hydrochloric acid pickle	No parameters set	No limits	-	-	-
A4 (Point 4 on air emissions plan 1 in schedule 7)	Enstrip	No parameters set	No limits	-	-	-
A5 (Point 5 on air emissions plan 1 in schedule 7)	Electroless Nickel	No parameters set	No limits	-	-	-
A6 (Point 6 on air emissions plan 1 in schedule 7)	Stoving Ovens 5,6	No parameters set	No limits	-	-	-
A7 (Point 7 on air emissions plan 1 in schedule 7)	Main Extractor No2	No parameters set	No limits	-	-	-
A8 (Point 8 on air emissions plan 1 in schedule 7)	Stoving Oven no. 10	No parameters set	No limits	-	-	-
A9 (Point 9 on air emissions plan 1 in schedule 7)	Stoving Oven no. 9	No parameters set	No limits	-	-	-
A10 (Point 10 on air emissions plan 1 in schedule 7)	Gas boiler	No parameters set	No limits	-	-	-
A11 (Point 11 on air emissions plan 1 in schedule 7)	Main gas boiler	No parameters set	No limits	-	-	-
A12 (Point 12 on air emissions plan 1 in schedule 7)	Laboratory Spectrophotometer	No parameters set	No limits	-	-	-
A13 (Point 13 on air emissions plan 1 in schedule 7)	Activax alkaline cleaner	No parameters set	No limits	-	-	-
A14 (Point 14 on air emissions plan 1 in schedule 7)	Gas fired Vat heater	No parameters set	No limits	-	-	-
A15 (Point 15 on air emissions plan 1 in schedule 7)	Laboratory Annexe Fume cupboard	No parameters set	No limits	-	-	-
A16 (Point 16 on air emissions plan 1 in schedule 7)	Dry film lubrication	No parameters set	No limits	-	-	-
A17 (Point 17 on air emissions plan 1 in schedule 7)	Cyanide copper plating	No parameters set	No limits	-	-	-

Emission point ref. & location (1)	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A20 (Point 24 on air emissions plan 1 in schedule 7)	Hard sulphuric anodising	No parameters set	No limits	-	-	-
A23 (Point 25 on air emissions plan 1 in schedule 7)	Sulphuric anodising	No parameters set	No limits	-	-	-
A24 (as identified as V001 on air emissions plan 2 in schedule 7)	New Painting line spray booth 1	No parameters set	No limits	-	-	-
A25 (as identified as V002 on air emissions plan 2 in schedule 7)	New Painting line spray booth 2	No parameters set	No limits	-	-	-
A26 (as identified as V003 on air emissions plan 2 in schedule 7)	New Painting line spray booth 3	No parameters set	No limits	-	-	-
A27(as identified as V004 on air emissions plan 2 in schedule 7)	New Painting line spray booth 4	No parameters set	No limits	-	-	-
A28 (as identified as V005 on air emissions plan 2 in schedule 7)	New Painting line spray booth 5	No parameters set	No limits	-	-	-
A29 (as identified as V006 on air emissions plan 2 in schedule 7)	New Painting line spray booth 6	No parameters set	No limits	-	-	-
A30 (as identified as V007 on air emissions plan 2 in schedule 7)	New Paint shop Ovens 4,5 and 6	No parameters set	No limits	-	-	-
A31(as identified as V008 on air emissions plan 2 in schedule 7)	New Paint shop Ovens 1,2 and 3	No parameters set	No limits	-	-	-

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 Figure 32 of the original application BP4356IN	No parameters set	Uncontaminated surface water from site drainage via interceptor at Maple Park Industrial Estate Park.	-	-	-	-
W2 on Figure 32 of the original application BP4356IN	No parameters set	Uncontaminated surface water from site drainage via interceptor at Maple Park Industrial Estate Park.	-	-	-	-

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
W3 on Figure 32 of the original application BP4356IN	No parameters set	Uncontaminated surface water from site drainage via interceptor at Maple Park Industrial Estate Park.	-	-	-	-
W4 on Figure 32 of the original application BP4356IN	No parameters set	Uncontaminated surface water from site drainage via interceptor at Maple Park Industrial Estate Park.	-	-	-	-
W5 on Figure 32 of the original application BP4356IN	No parameters set	Uncontaminated surface water from site drainage via interceptor at Maple Park Industrial Estate Park.	-	-	-	-
W6 on Site drainage plan 1 in schedule 7	No parameters set	Uncontaminated surface water from extension area car park next to new paint shop	-	-	-	-
W7 on Site drainage plan 1 in schedule 7	No parameters set	Roof water from new paint shop	-	-	-	-

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 (including unit)	Reference Period	Monitoring frequency	Monitoring standard or method
S1 on Figure 32 of the original application BP4356IN	Effluent treatment plant discharge (non-cadmium treatment plant only)	Total cadmium	0.01 mg/l	Spot sample	Annual	BS EN ISO 5961
		Free cyanide	0.2 mg/l	Spot sample	Annual	BS EN 14403-2

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 Effluent	S1 emissions Free cyanide and cadmium	Annually	02/02/23

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 S1 or other form as agreed in writing by the Environment Agency	02/02/23
Waste Return	Form water 1 or other form as agreed in writing by the Environment Agency	03/09/12
Water usage	Form WU 1 or other form as agreed in writing by the Environment Agency	26/01/22
Energy usage	Form E1 or other form as agreed in writing by the Environment Agency	26/01/22

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	
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 breach of permit conditions not related to limits	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

(d) 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.

“annually” means once every year.

“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 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.

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

“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.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“year” means calendar year ending 31 December.

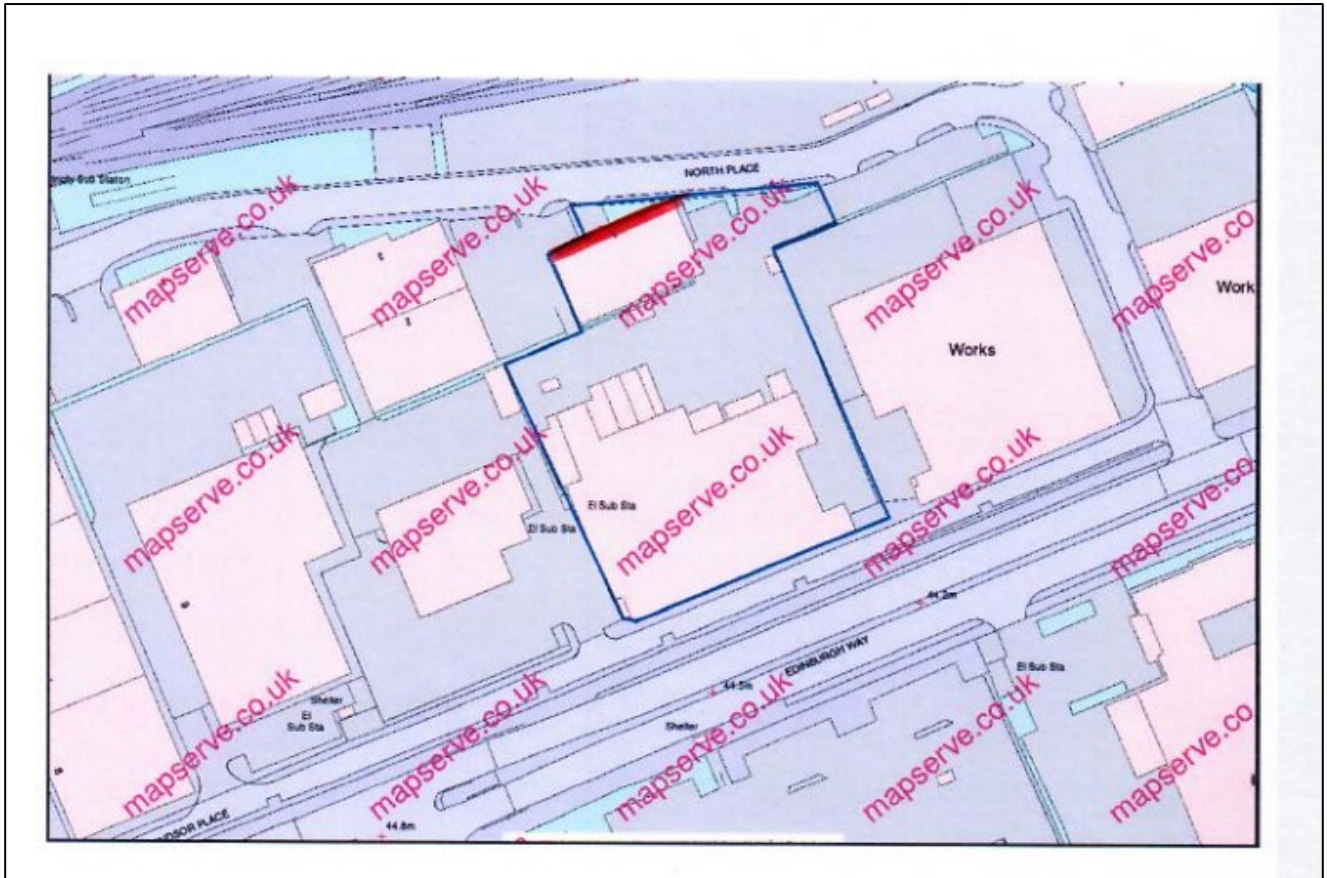
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

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

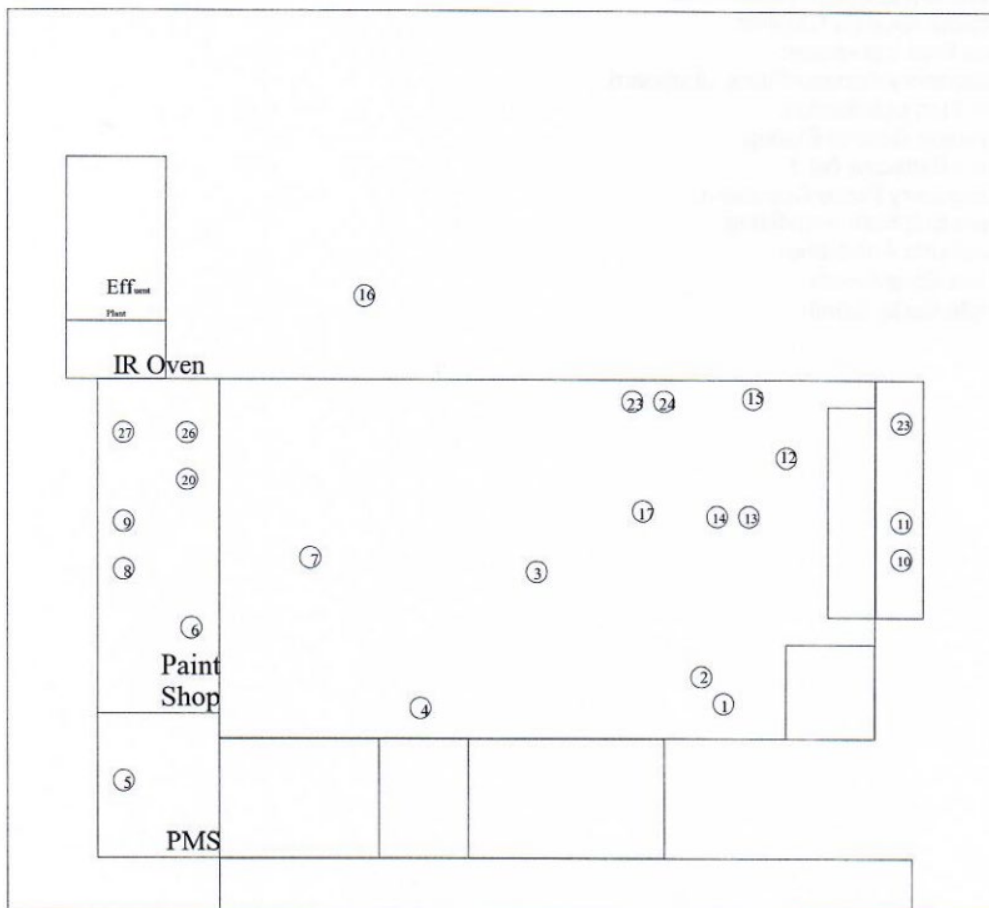
- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or
- in relation to emissions from non-combustion sources, the concentration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

Schedule 7 – Site plan

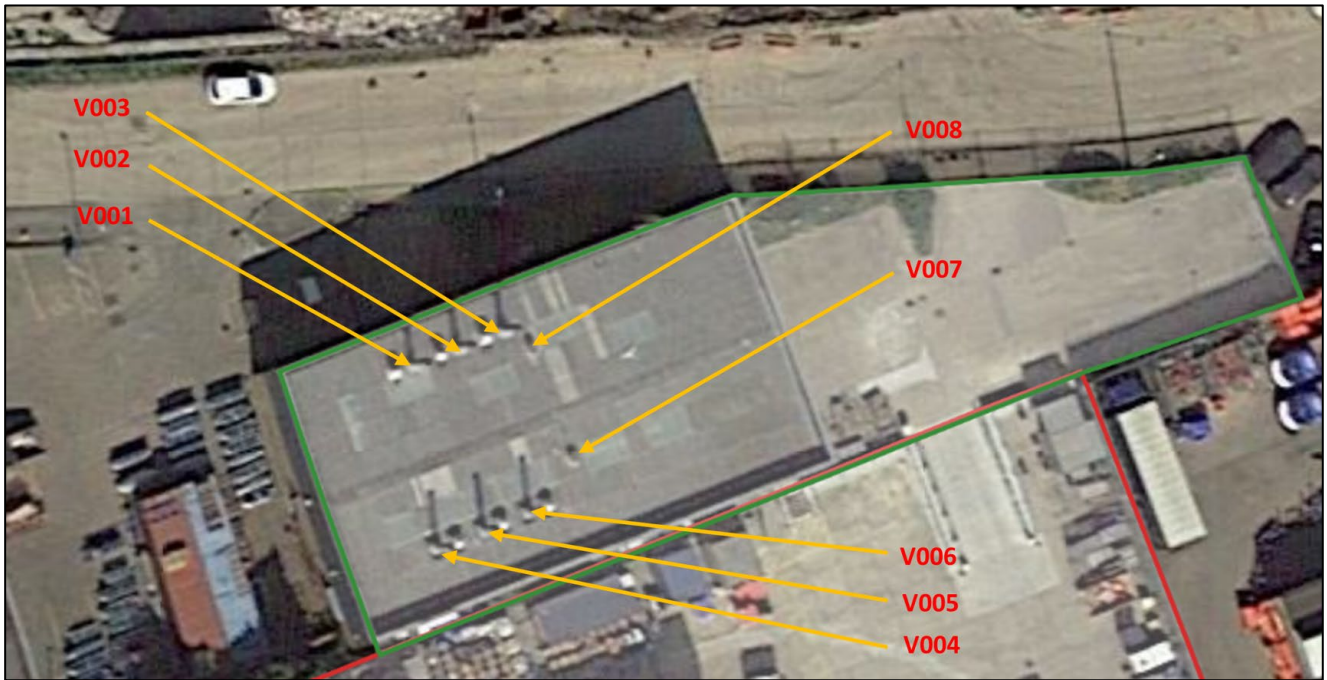
Installation Boundary Plan



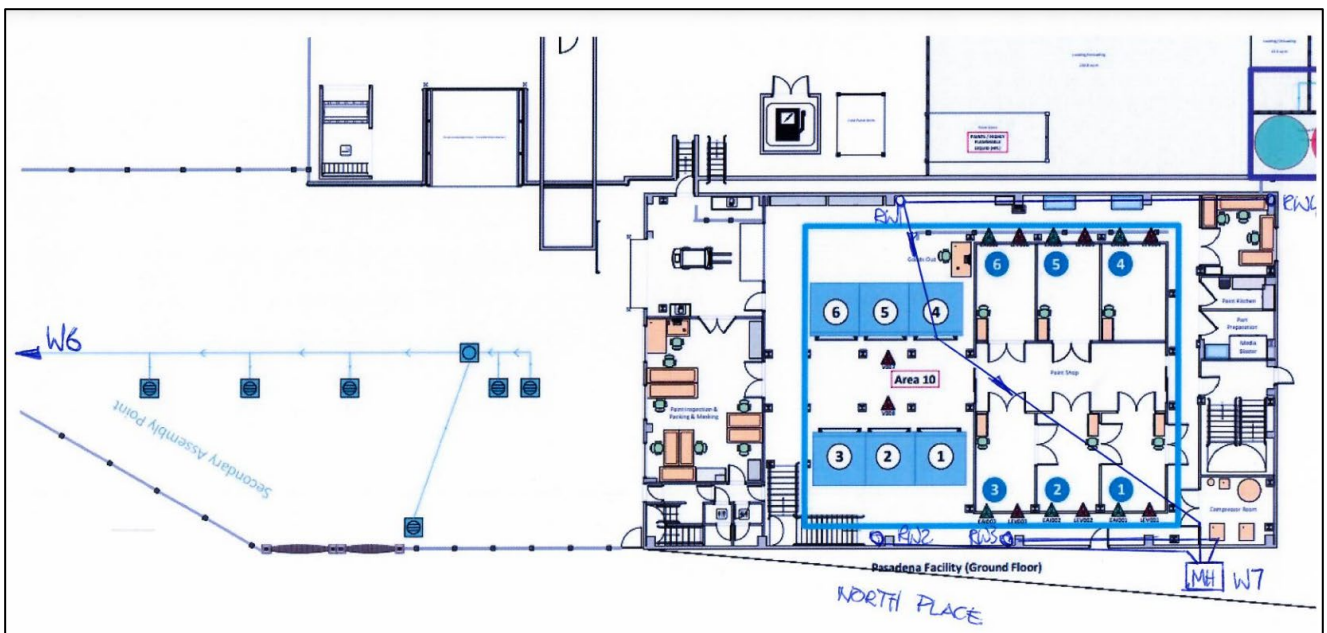
Air Emissions Plan 1



Air Emissions Plan 2



Site Drainage Plan 1



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