

Torfaen County Borough Council



Permit with introductory note

**The Pollution Prevention and Control Act 1999
The Environmental Permitting (England & Wales)
Regulations 2016**

Part B Permit for: **Safran Seats GB Ltd.**
Kestrel House
Lakeside
Llantarnam Industrial Estate
Cwmbran
Torfaen
UK
NP44 3HQ

Permit Reference TCBC EPA B36

SURFACE CLEANING INSTALLATION

Address for Communication:

**Planning and Public Protection Department
Ty Blaen Torfaen
Panteg Way
New Inn
Pontypool
Torfaen
NP4 0LS**

No table of contents entries found.

Contents

<i>Permit with introductory note</i>	1
<i>Introductory note</i>	3
<i>Brief description of the installation regulated by this Permit</i>	3
<i>Talking to us</i>	3
<i>Confidentiality</i>	3
<i>Variations of the Permit</i>	3
<i>Surrender of the Permit</i>	4
<i>Transfer of the Permit</i>	4
<i>Offences</i>	4
<i>Enforcement</i>	4
<i>Revocation</i>	4
<i>Suspension</i>	4
<i>Appeals</i>	5
<i>Powers of entry</i>	5
<i>Status Log</i>	6
<i>The Permitted Installation</i>	8
<i>Table 1</i>	8
<i>Permit Conditions</i>	9
<i>Emission Limits and Controls</i>	9
<i>Table 2</i>	9
<i>Solvent Management Plan</i>	10
<i>Monitoring, Investigations and Recording</i>	10
<i>Further Information Required by Torfaen County Borough Council</i>	10
<i>Abnormal Events</i>	11
<i>Calibration and Compliance Monitoring</i>	11
<i>Varying Monitoring Frequency</i>	11
<i>Sampling Provisions</i>	12
<i>VOC Handling, Storage and Odour Control</i>	12
<i>Stacks, Vents and Process Exhausts</i>	13
<i>Training</i>	13
<i>Maintenance</i>	14
<i>Changes to Process</i>	14
<i>References</i>	15
<i>SCHEDULE A</i>	16
<i>APPENDIX 1 - Definitions</i>	19
<i>APPENDIX 2 Process Boundary</i>	20
<i>APPENDIX 3 Site Plans Showing Emission Points, Solvent Stores & Waste stores</i>	22

Introductory note

This introductory note does not form part of the Permit

This Permit authorises the operation of an activity listed in Part 2 to Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2016 to the extent specified in the Permit and shall be treated as having been granted under Regulation 13(1) of those Regulations. It must not be taken to replace any responsibilities under The Health and Safety at Work (Etc.) Act 1974 and associated legislation.

Brief description of the installation regulated by this Permit

The installation involves the manual surface cleaning of various kinds of aircraft seat component parts prior to manual application of adhesives and in some cases, the component parts are also coated and dried.

Talking to us

To speak to an officer concerned with this permit please contact Peter Oates on 01633 647290 or peter.oates@torfaen.gov.uk.

In the event of an emergency occurring outside of normal office hours you should contact 01495 762200 and ask for the Environmental Health Officer.

Confidentiality

The Permit requires the Operator to provide information to the Council. The Council will place the information onto the public registers in accordance with the requirements of the EP Regulations. If the Operator considers that any information provided is commercially confidential, it may apply to the Council to have such information withheld from the register as provided in the EP Regulations. To enable the Council to determine whether the information is commercially confidential, the Operator should clearly identify the information in question and should specify clear and precise reasons.

Variations of the Permit

This Permit may be varied in the future in accordance with Regulation 20 of the EP Regulations. The Status Log within the Introductory Note to any such variation will include summary details of this Permit, variations issued up to that point in time and state whether a consolidated version of the Permit has been issued.

Surrender of the Permit

Before this Permit can be wholly or partially surrendered, an application to surrender the Permit has to be made in accordance with Regulation 24 of the EP Regulations.

Transfer of the Permit

Before the Permit can be wholly or partially transferred to another person, a joint application to transfer the Permit has to be made by both the existing and proposed holders, in accordance with Regulation 21 of the EP Regulations. A transfer will be allowed unless the Council considers that the proposed holder will not be the person who will have control over the operation of the installation or will not ensure compliance with the conditions of the transferred Permit.

Any change in the activities covered by this permit must be notified to the Council for approval prior to implementation.

Offences

Regulation 38 of the EP Regulations defines the offences that may arise as a result of non-compliance with the regulations or conditions contained within this permit. You are advised to be familiar with this regulation since a person guilty of an offence could be fined up to £50,000 and/or be subject to imprisonment for a term not exceeding 12 months.

Enforcement

If the conditions attached to this Permit are not adhered to, then an enforcement notice may be served upon the operator in accordance with Regulation 36 of the EP Regulations. This notice will specify the contraventions and the steps to be taken to remedy the situation. It is an offence not to comply with such an Enforcement Notice (see above).

Revocation

The Permit may be revoked at any time by the enforcing Local Authority in accordance with Regulations 22 & 23 of the EP Regulations. This will particularly be considered if fees are not paid or enforcement notices are not complied with, in accordance with Regulation 65(5).

Suspension

The Regulator has a duty to serve a suspension notice in accordance with Regulation 37 of the EP Regulations if it is considered that there is a risk of serious pollution to the environment, whether or not there has been a breach of the Permit.

Appeals

Any person who has been refused a Permit, is aggrieved by the conditions attached to the Permit, has been refused a variation of a Permit on application or has had a Permit revoked may appeal against the decision of the Regulator to the Welsh Ministers.

Powers of entry

Any duly authorised officer of the Regulator may enter premises to inspect activity at all reasonable times. On entry of the premises the officer also has powers to take any equipment or materials with him for which the power of entry is being exercised, to make such examination and investigation as may be necessary, to take such photographs, measurements or samples and seek any other assistance necessary to assist him in his duties.

Status Log

Detail	Date	Comment
Application for an Environmental Permit	Duly Made 7th January 2013	
Draft Environmental Permit Issued	14th January 2013	
Environmental Permit Issued	19th February 2013	
Environmental Permit Varied	9th October 2017	Additional point sources for adhesive spray booths and coating booth
Environmental Permit Varied	27th January 2019	Company name change from Zodiac Seats to Safran Seats

Current PG Note – PG 6/45 (11)

PG notes are under review please contact the DEFRA website for the latest version.

<http://www.defra.gov.uk/environment/quality/industrial/las-regulations/guidance/>

Permit

The Environmental Permitting (England & Wales) Regulations 2016

Permit number: **TCBC/EP B36**

Torfaen County Borough Council (“the Regulator”) in exercise of its powers under Regulation 13 of the Environmental Permitting (England & Wales) Regulations 2016, hereby permits

Safran Seats GB Ltd. (“the operator”)

Of/whose *Registered Office* is

Kestrel House
Lakeside
Llantarnam Industrial Estate
Cwmbran
Torfaen
NP44 3HQ

to operate an installation at

Kestrel House, Henry Thomas House, Talgarth House and Kyle Adams House (Units 57 & 58)
Llantarnam Industrial Estate
Cwmbran
Torfaen
NP44 3HQ

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

Signed



Peter Oates: Senior Environmental Health Officer

Authorised to sign on behalf of Torfaen County Borough Council

Date

27 February 2019

The Permitted Installation

The Operator is authorised to carry out the activities and/or the associated activities specified in Table 1, within the boundary of the site as shown in red in Appendix 2 to this permit.

Table 1

Activity under Schedule 1 of the Regulations	Schedule 1 Activity Reference	Description of Specified Activity
IED Activities	Industrial Emissions Directive VII Parts 1 & 2	Manual surface cleaning of aircraft seating components process, where organic solvent is applied by means of a cloth
	Directly Associated Activity	The application of adhesive coating of aircraft seating components, where the adhesive is applied by brush.
	Directly Associated Activity	The application of adhesive coating of aircraft seating components, where the adhesive is applied by spray applicator.
	Directly Associated Activity	The mixing, application and drying of paint coatings for aircraft seating components using a spray applicator and gas oven.
	Directly Associated Activity	The storage and handling of raw materials
	Directly Associated Activity	The storage and handling of solid and liquid wastes

Permit Conditions

Emission Limits and Controls

1. All releases to air in normal operation, including start up and shut down, other than condensed water vapour, shall be free from persistent visible emissions.
2. All emissions shall be free from offensive odour outside the installation boundary, as perceived by authorised officers of Torfaen County Borough Council.
3. Emissions from combustion processes shall, during normal operation, be free from visible smoke and in any case shall not exceed the equivalent of Ringelmann Shade 1 as described in British Standards BS 2742: 2009.
4. All pollutant concentrations shall be expressed at reference conditions, 273 K, 101.3 kPa without correction for water vapour content.
5. The following Table 2 shows the specified emission limits, monitoring method and frequency for any point source emissions. No result obtained from monitoring exercises shall exceed these emission limits.

Table 2

Row Number	Pollutant	Concentration Limit Value	Monitoring Method & Frequency	Fugitive Emission Values
1	VOC expressed as total mass of organic carbon	75 mgCarbon/Nm³	Annual Manual Extractive BS EN 13526	20% of solvent input

Test methods are continually being reviewed and updated and Operators are advised to check the Environment Agency website for information on the latest approved test methods.

<http://www.environment-agency.gov.uk/business/regulation/31831.aspx>

6. The introduction of dilution air to achieve an emission concentration limit is not permitted.
7. All appropriate precautions must be taken to minimise emissions during start-up, shut down and emergency shut downs.

Solvent Management Plan

8. The Operator shall produce a Solvent Management Plan that shall be updated and submitted annually. The Solvent Management Plan shall be produced using the definitions and calculations set out in Clauses 4.9, 4.10, 4.11 and 4.12, of PG 6/45(11) reproduced in Schedule A to this Permit.

Monitoring, Investigations and Recording

9. The operator shall keep records of inspections, tests and monitoring, including all non-continuous monitoring, inspections and visual assessments. The records shall be:
 - kept on site
 - kept by the operator for at least two years; and
 - made available for authorised officers of Torfaen County Borough Council to examine

Further Information Required by Torfaen County Borough Council

10. Torfaen County Borough Council shall be advised at least 7 days in advance of any periodic monitoring exercise to determine compliance with emission limit values set out in condition 5 above. In particular, the Council shall be informed about the provisional time and date of monitoring, the pollutants to be tested and the methods to be used.
11. The results of non-continuous emission testing shall be forwarded to Torfaen County Borough Council within 8 weeks of the completion of sampling.
12. Adverse results from any monitoring activity (both continuous and non-continuous) shall be investigated by the operator as soon as the monitoring data has been received/obtained. The operator shall:
 - identify the cause and take corrective action
 - record as much detail as possible regarding the cause and extent of the problem, and the action taken by the operator to rectify the situation
 - re-test to demonstrate compliance as soon as possible: and
 - notify Torfaen County Borough Council

Abnormal Events

13. In the case of malfunction or breakdown leading to abnormal emissions the operator shall:

- Investigate and undertake remedial action immediately
- Adjust the process or activity to minimise those emissions; and
- Promptly record the events and the action taken

14. Where overnight working is being carried on, the operator shall ensure that there is a fully trained staff member on duty to take appropriate action in the event of a malfunction or breakdown leading to abnormal emissions.

15. Torfaen County Borough Council shall be informed without delay:

- If there is an emission that is likely to have an effect on the local community; or
- In the event of the failure of key abatement plant

Calibration and Compliance Monitoring

16. Non-continuous monitoring of the pollutants detailed in condition 5. above shall be carried out at least once a year.

17. No results shall exceed the emission concentration limits specified in Condition 5 above.

18. For the periodic monitoring of VOCs, at least three readings must be obtained during each measurement exercise. VOC emission limit values shall be considered to be complied with if, in one monitoring exercise:

- a) the average of all the readings does not exceed the emission limit values in condition 5 above
- b) none of the hourly averages exceeds the emission limit value by more than a factor of 1.5

19. Calibration and compliance monitoring for all substances shall be carried out using the methods detailed in Condition 5 above.

Varying Monitoring Frequency

20. The frequency of non-continuous monitoring may be varied where consistent compliance is demonstrated using the results from:

- Three or more monitoring exercises carried out within two years; or
 - Two or more monitoring exercises in one year supported by continuous monitoring
21. Any significant process changes which might have affected the monitored emissions shall be taken into account

Sampling Provisions

22. The operator shall ensure that adequate safe facilities for sampling are provided on stacks or ducts which allow compliance with the sampling standard.
23. Sampling points on new plant shall be designed to comply with the British standard or equivalent standards.
24. Where monitoring is not in accordance with the main procedural requirements of the relevant standard, deviations should be reported as well as an estimation of the likely error.

VOC Handling, Storage and Odour Control

25. All potentially odorous materials shall be stored in suitable closed containers.
26. Raw materials containing VOC should be stored in closed storage containers.
27. All measures must be taken to minimise VOC emissions during the mixing of paint.
28. All spillages shall be cleared as soon as possible; solids by vacuum cleaning, wet methods, or other appropriate techniques.
29. Dry sweeping of dusty materials is not permitted.
30. Cleaning operations involving organic solvents shall be reviewed at least once every two years to identify opportunities for reducing VOC emissions. Torfaen County Borough Council shall be provided with a report on the conclusions of the review within 8 weeks of production.
31. A programme to monitor and record the consumption of organic solvents against product produced shall be used to minimise the amount of excess organic solvent used.
32. All reasonable practicable efforts shall be made to minimise the amount of residual organic solvent bearing material left in drums and other containers after use. All organic solvent contaminated waste shall be stored in closed containers.

33. Prior to disposal, empty drums and containers contaminated with organic solvent shall be closed to minimise emissions from residues during storage prior to disposal and labelled, so that all that handle them are aware of their contents and hazardous properties.
34. Nominally empty drums or drums containing waste contaminated with VOC awaiting disposal, shall be stored in accordance with the requirements for full or new containers.
35. Prior to disposal used wipes and other items contaminated with organic solvent shall be placed in a suitably labelled metal bin fitted with a self-closing lid.
36. For materials that may undergo spontaneous combustion, special bins that allow air to circulate beneath and around them to aid cooling, are advised or other bins specifically designed for this purpose.

Note: From a health and safety point of view it is advised that bins should be emptied at least daily, as they not only present a fire hazard, they may also undergo spontaneous combustion.
37. Suitable organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas.
38. A high standard of housekeeping shall be maintained at all times.

Stacks, Vents and Process Exhausts

39. Adequate insulation shall be provided to minimise the cooling of waste gases and prevent liquid condensation by keeping the temperature of the exhaust gases above the dew point.
40. Stacks and ductwork shall be cleaned to prevent accumulation of materials as part of the routine maintenance programme.

Training

41. Staff at all levels shall receive formal training and instruction in their duties relating to control of the installation and emissions to air. Training of all staff who work with solvents shall include:
 - Awareness of their responsibilities under this permit; in particular how to deal with conditions likely to give rise to VOC emissions, such as in the event of spillage.
Note: Training records and requirements may be addressed within the operator's environmental management system.

42. The operator shall maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment. These documents shall be made available to authorised officers of Torfaen County Borough Council on request.

Maintenance

43. Effective preventative maintenance shall be employed on all aspects of the process including all plant, buildings and the equipment concerned with the control of emissions to air. In particular:

- A written maintenance programme shall be provided to Torfaen County Borough Council with respect to pollution control equipment; and
- A record of such maintenance shall be made available for inspection by Torfaen County Borough Council

Changes to Process

44. If the operator proposes to make a change in operation of the installation, he must, at least 14 days before making the change, notify the regulator in writing. The notification must contain a description of the proposed change in operation. It is not necessary to make such a notification if an application to vary this permit has been made and the application contains a description of the proposed change. In this condition 'change in operation' means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.

END OF PERMIT CONDITIONS

SCHEDULE A

Note: Schedule A is taken from Process Guidance Note 6/45 (11)

Determination of Solvent Consumption

4.7 Construction of inventories of materials consumed and disposed of may involve the identification of individual organic solvents, or solids. This may give rise to an issue of commercial confidentiality. Information supplied must be placed on the public register, unless exclusion has been granted on the grounds of commercial confidentiality or national security. (Further information can be found in the appropriate chapter of the relevant General Guidance Manual)

4.8 A determination of the organic solvent consumption, the total mass of organic solvent Inputs minus any solvents sent for reuse/recovery off-site, should be made and submitted to the regulator annually, preferably to coincide with the operators stocktaking requirements. This should be in the form of a mass balance in order to determine the annual actual consumption of organic solvent (C):

Where: $C = I_1 - O_8$ (See paragraph 4.12 below).

Solvent Management Plan

4.9 Operators buy solvents to replace those lost during the process or included in the product. There are both environmental and cost savings from reducing the losses. The Solvent Emissions Directive requires an SMP to be produced to determine fugitive emissions (SED Box 5), identify future reduction options and give the public access to information about solvent consumption etc.

4.10 The SED provides guidance on what constitutes a solvent input and an output (see paragraph 4.12 below). This can be described more simply as needing data on:

Inputs:

How much solvent is:

- Bought, whether in pure form or contained in products
- Recycled back into the process

Outputs

How much solvent is:

- Emitted to air, whether directly or via abatement equipment
- Discharged to water, whether directly or via water treatment
- Sent away in waste
- Lost by spills, leaks etc
- Leaving the installation in the product

4.11 There is guidance on the [Government archive website about solvent management](#)

4.12 The definitions in Annex III of the SED are as follows and are shown diagrammatically in **Figure 4.1**.

Inputs of Organic Solvent in the time frame over which the mass balance is being calculated (I)

I1 The quantity of organic solvents or their quantity in mixtures purchased which are used as input into the process/activity (including organic solvents used in the cleaning of equipment, but not those used for the cleaning of the products).

I2 The quantity of organic solvents or their quantity in mixtures recovered and reused as solvent input into the process/activity. (The recycled solvent is counted every time it is used to carry out the activity.)

Outputs of Organic Solvents in the time frame over which the mass balance is being calculated (O)

O1 Emissions in waste gases.

O2 Organic solvents lost in water, if appropriate taking into account waste water treatment when calculating O5.

O3 The quantity of organic solvents which remains as contamination or residue in products output from the process/activity.

O4 Uncaptured emissions of organic solvents to air. This includes the general ventilation of rooms, where air is released to the outside environment via windows, doors, vents and similar openings.

O5 Organic solvents and/or organic compounds lost due to chemical or physical reactions (including for example those which are destroyed, e.g. by thermal oxidation or other waste gas or waste water treatments, or captured, e.g. by adsorption, as long as they are not counted under O6, O7 or O8).

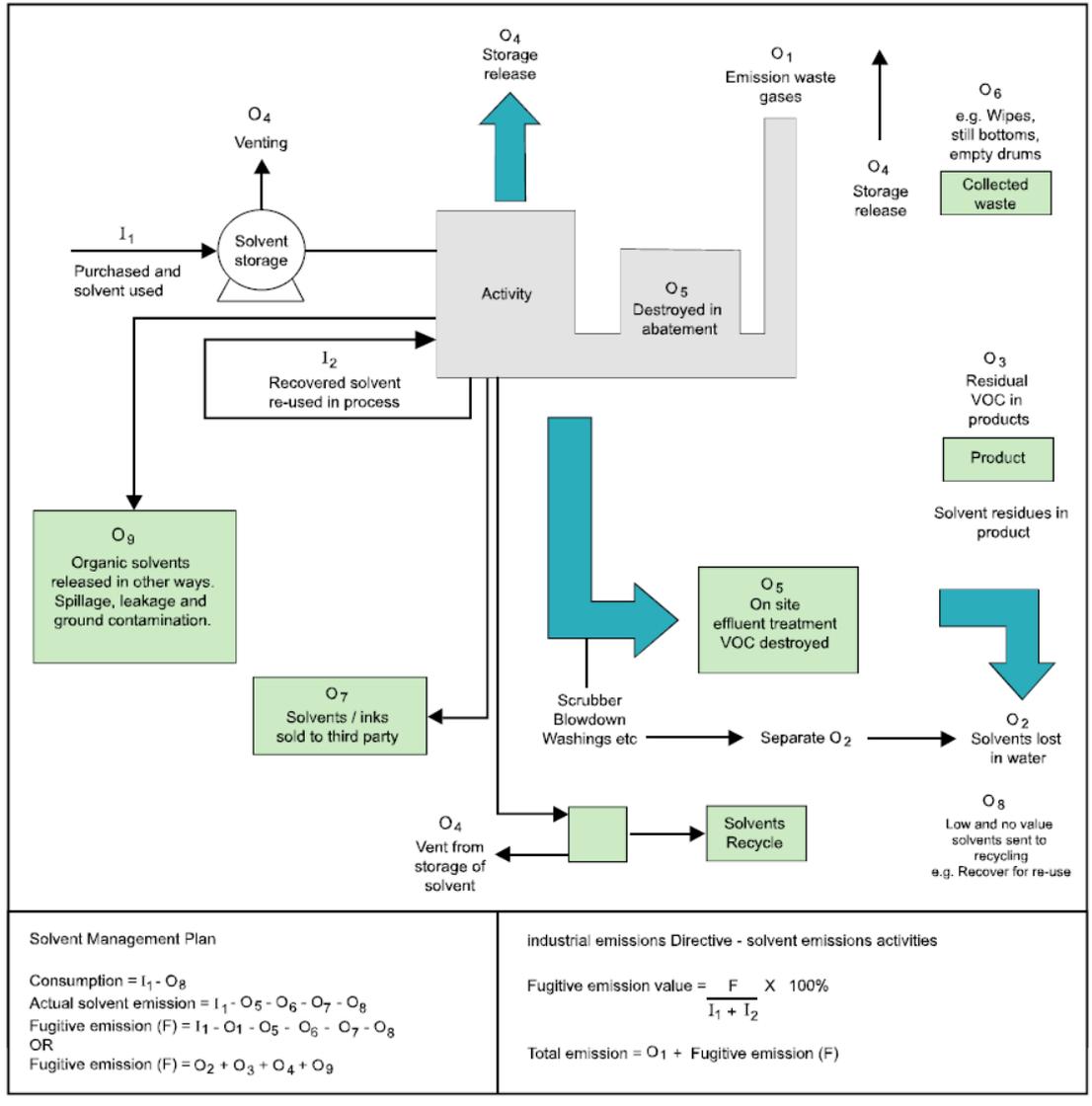
O6 Organic solvents contained in collected waste.

O7 Organic solvents, or organic solvents contained in mixtures, which are sold or are intended to be sold as a commercially valuable product.

O8 Organic solvents contained in mixtures recovered for reuse but not as input into the process/activity, as long as not counted under O7.

O9 Organic solvents released in other ways

Figure 4.1 Solvent Management Plan Inputs and Outputs

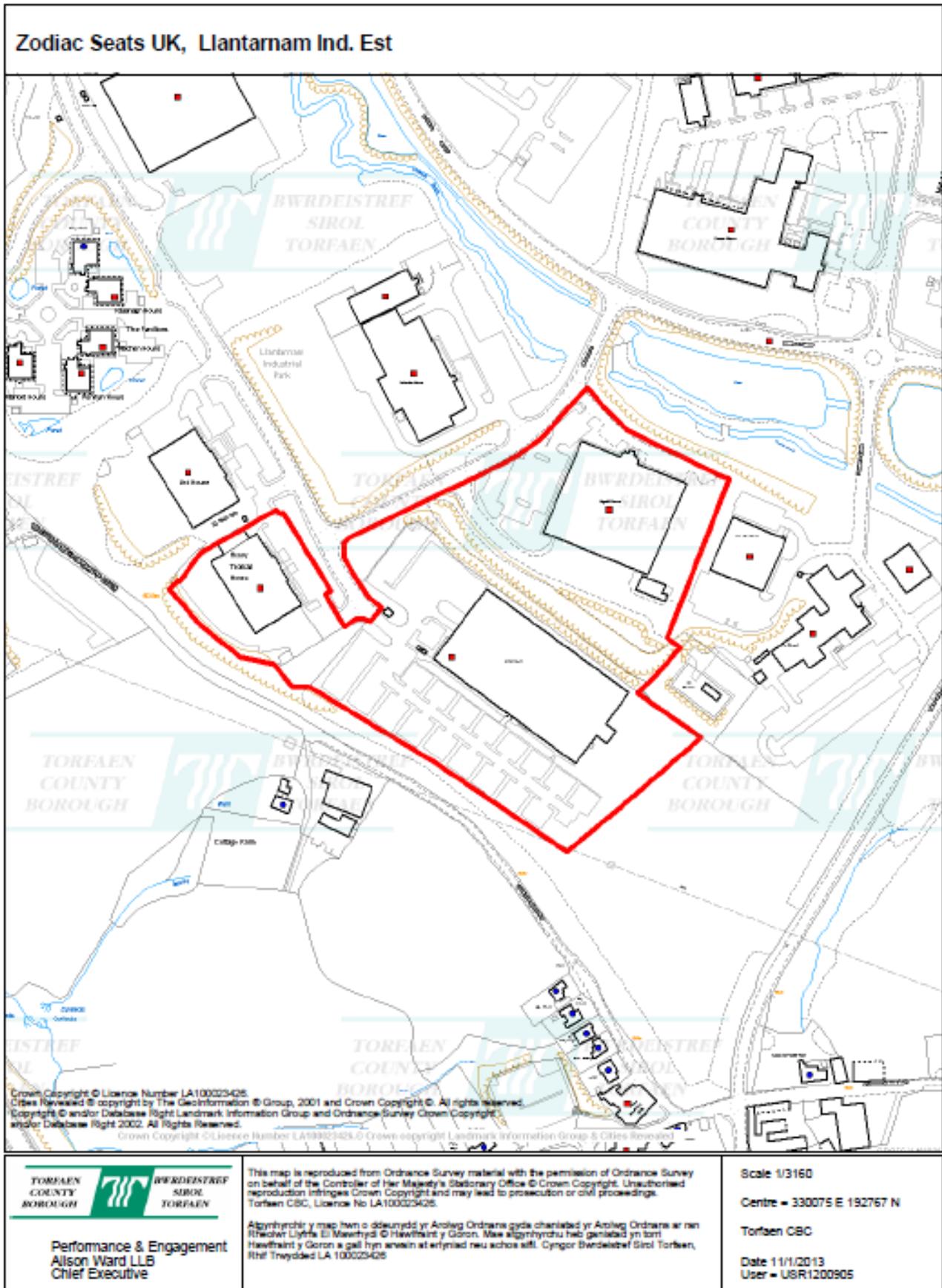


APPENDIX 1 - Definitions

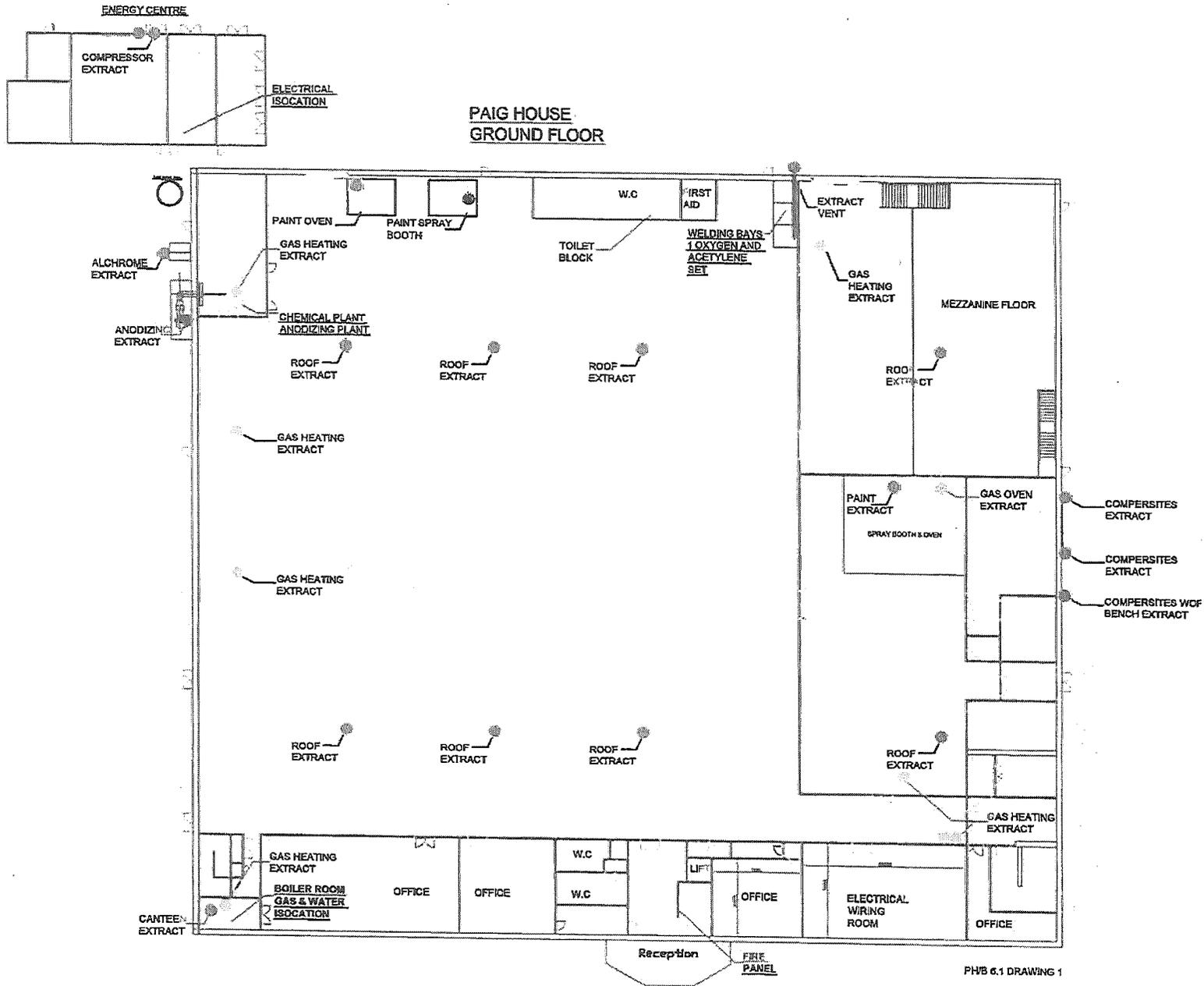
“Regulator”	Torfaen County Borough Council, Planning and Public protection Department
“Operator”	Crane Process Flow Technologies Ltd.
“Installation”	A stationary technical unit where one or more of the activities listed in Part 2 of Schedule 1 to the Environmental Permitting (England & Wales) Regulations 2010 are carried out, and, any other location on the same site where any other directly associated and technically connected activities are carried out which could have an effect on pollution.
“Activity”	An activity listed in Part 2 of Schedule 1 to the Environmental Permitting (England & Wales) Regulations 2010 and any other directly associated activity with a technical connection to the stationary technical unit which could have an effect on pollution.
“Pollution”	Emissions to air arising as a result of human activity which may be harmful to human health or the quality of the environment, cause offence to any human senses, result in damage to material property or impair or interfere with amenities and other legitimate uses of the environment.
“Pollutant”	Any substance or heat released to air as a consequence of a pollution event.
“Air”	Includes air within buildings and air within any other natural or man made structures above and below ground.
“Colourless”	Shall not be taken to mean white, grey or black emissions.
“Fume”	Particulate matter of less than 1 micron diameter, vapours and aerosols of colloidal particles that are visible, but excludes steam.
“Droplets”	Liquid fractions (larger than mist or fume), which are released from the rim of a stack or vent and precipitate from the emission plume within the locality of the emission source.
“Abnormal Emissions”	Any atmospheric emission outside the normal range of the installation when operating under routine conditions.
“Significant Emissions”	Any atmospheric emission visible more than 10 metres from the source
“Ringelmann Shade 1”	The meaning contained within British Standard BS2472: 1969
“Persistent”	A continuous or frequent emission or an emission remaining in the local environment as a consequence of poor dispersion.
“Inspection”	The physical examination of the installation and any associated records (written and electronic format), to assess compliance in respect of the permit.
“Monitoring”	A mechanism for assessing the performance of the process primarily from the volume and nature of the emissions in order to assess compliance with specified emission limit values contained within the permit.
“Visual Assessment”	A programme of routine visual observations and subsequent evaluation of the character of the emission
“Olfactory Assessment”	A routine programme of observation of any odour produced as a result of the process and subsequent identification of its cause if possible.
“Authorised Officer”	An officer authorised by Torfaen County Borough Council to implement the provisions of the Environmental Permitting (England & Wales) Regulations 2010

APPENDIX 2 Process Boundary

The activities authorised under the conditions in Table 1 (Page 8) shall not extend beyond the Site, being the area shown edged in red on the plans below.

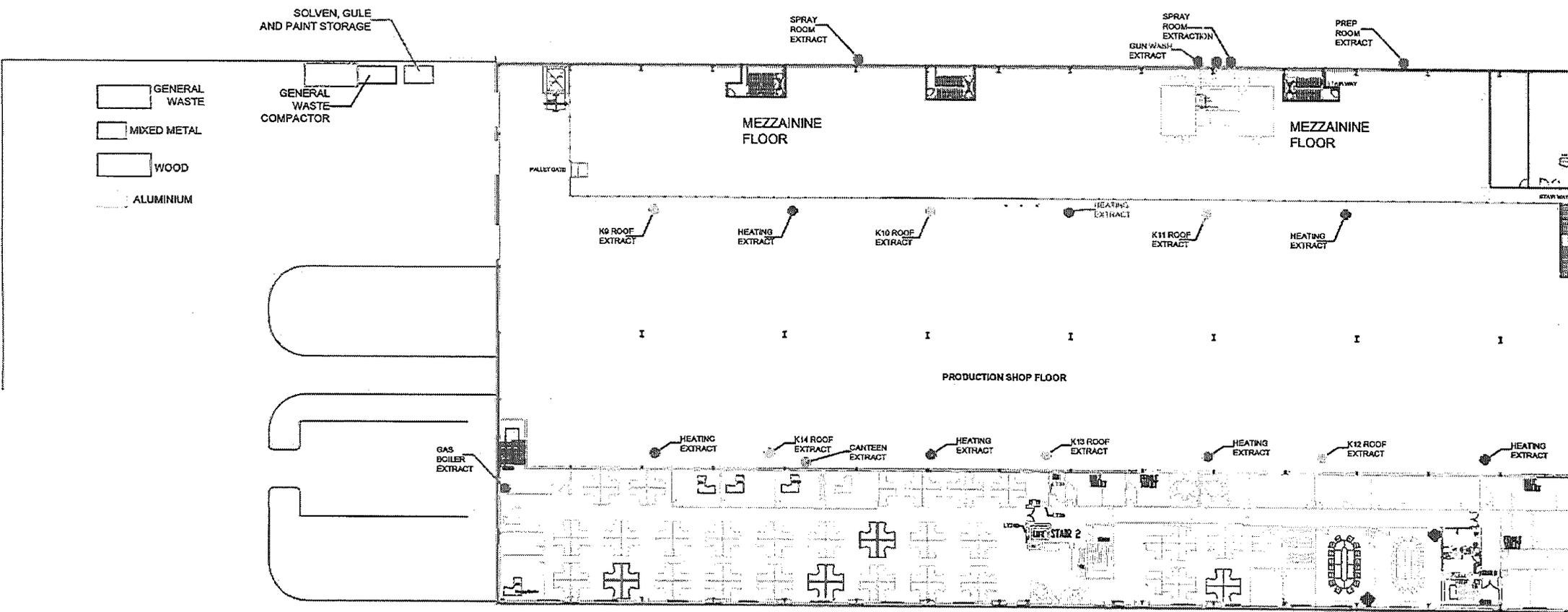


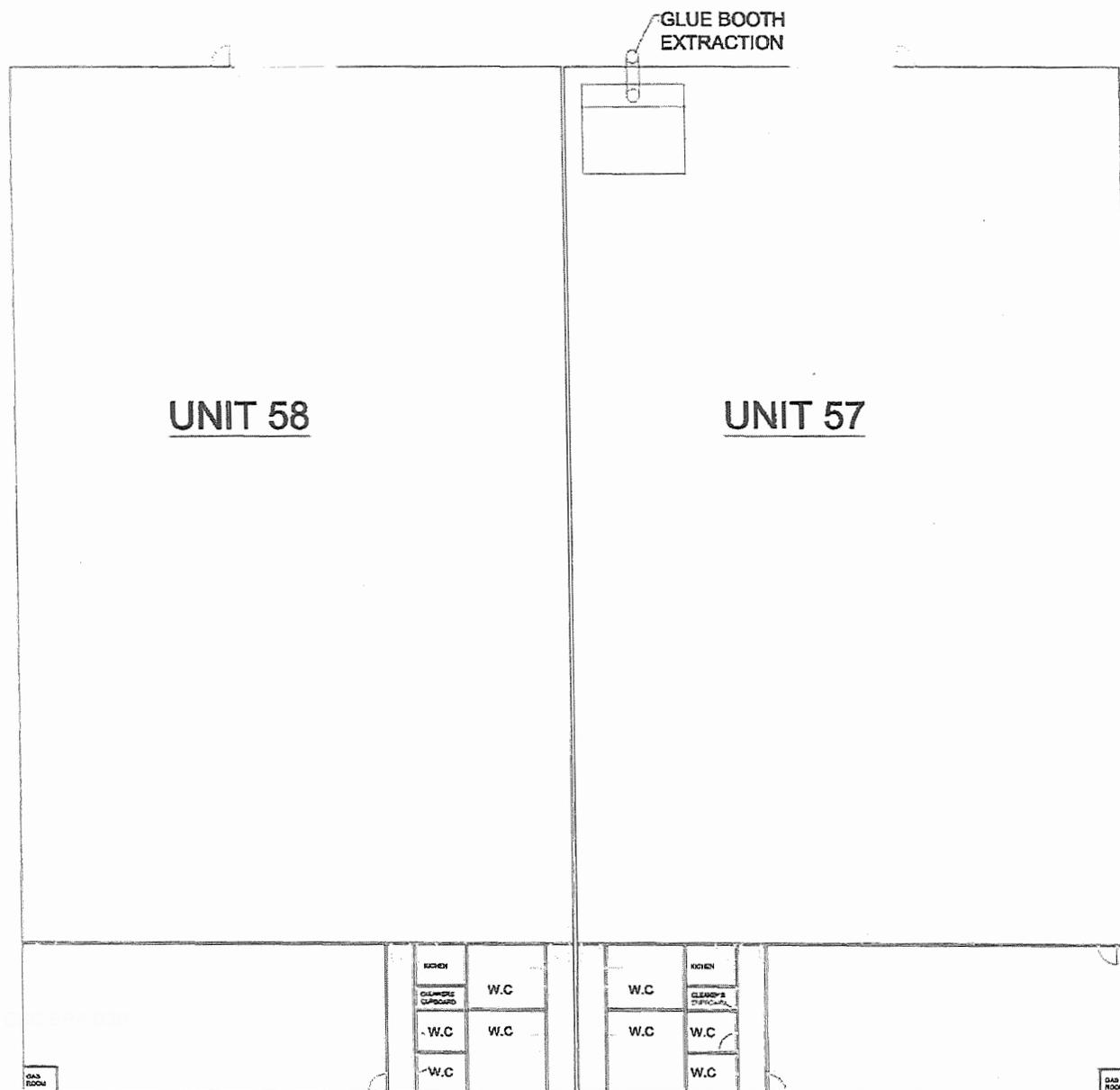
APPENDIX 3 Site Plans Showing Emission Points, Solvent Stores & Waste stores



F

KESTREL HOUSE ROOF





Permit 1