

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:

**Cyril Luff (Metal Decorators) Ltd
Unit 56-58 Springvale Industrial Estate
Cwmbran
Torfaen
NP44 5BD**

Permit Reference TCBC/EPA B11

Address for Communication:

**Planning and Public Protection Department
Floor 4
County Hall
Cwmbran
Torfaen
NP44 2WN**

Table of Contents

Cyril Luff (Metal Decorators) Ltd.....	1
Unit 56-58 Springvale Industrial Estate	1
Cwmbran	1
Torfaen	1
NP44 5BD	1
Planning and Public Protection Department.....	1
Floor 4	1
County Hall	1
Cwmbran	1
Torfaen	1
NP44 2WN	1
Table of Contents	2
Introductory note	4
Brief description of the installation	4
Talking to us.....	5
Confidentiality.....	5
Variations of the Permit.....	5
Surrender of the Permit	5
Transfer of the Permit.....	5
Offences.....	5
Enforcement	6
Revocation.....	6
Suspension.....	6
Appeals.....	6
Powers of entry.....	6
Status Log	7
Permit	8
The Permitted Installation	9
Table 1	9
Permit Conditions	10
Emission Limits and Controls	10
Table 2.....	10
Monitoring, Sampling and Measurement of Emissions.....	11
Table 3.....	12
Stacks and Ductwork.....	12
Notifications	12
Reporting Requirements.....	13
Materials Handling and Processing	13
General Operations.....	14
Appendix 1 - Definitions	16
Appendix 2 - Site Plan.....	17

Appendix 4 Emission Monitoring Protocol 18
VOC Monitoring 18

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 [the EP Regulations] 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

The process consists of a metal coating process followed by the lithographic printing onto the metal substrate, usually tin but can also be mild steel and aluminium. Line 1 is a printing line which is oven cured. Lines 6, 8 and 9 are printing lines and are cured by ultra violet light. Line 2 is a coating line which is water based and cured by ultra violet light. Lines 4 and 5 are coating lines. and emit to atmosphere via the Exothermic Eclipse thermal oxidiser. The oxidiser must be interlocked with the ovens on coating lines 4 and 5 so that both are in full operating condition before solvent based processing takes place. Emergency bypass stacks are installed so that in the event of oxidiser malfunction, the exhaust air from the ovens can be safely discharged to atmosphere at which point an alarm is activated so the process lines can be shut down safely.

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 Emergency 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 Protection Act 1990 Authorisation	08.09.1992	
EPA 1990 Authorisation Issued	10.11.1992	
Transfer of authorisation to Permit.	11.03.2008	Implementation of The Pollution Prevention and Control (England & Wales) Regulations 2000
Transfer of PPC Permit to Environmental Permit and minor variation.	22.08.2011	Implementation of The Environmental Permitting (England & Wales) Regulations 2010 Varied to include new oxidiser
Permit Varied as per application	31.05.2017	Removal of old oxidiser. Line 2 now UV cured water based coatings.
Permit Varied as per application	29.06.2021	Removal of Katec oxidiser and replacement with Exothermic Eclipse oxidiser.

Permit

The Environmental Permitting (England & Wales) Regulations 2016

Permit

Permit number: **TCBC/EPA B11**

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

Cyril Luff Metal Decorators Ltd. (“the operator”)

Of/whose Registered Office is

56-58 Springvale Industrial Estate
Cwmbran
Torfaen
NP44 5BD

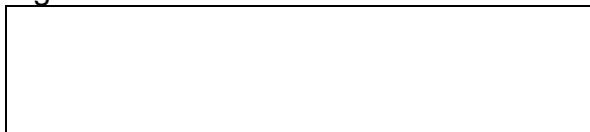
Company Registration Number: 1411397

to operate an installation at

Cyril Luff Metal Decorators Ltd.
56-58 Springvale Industrial Estate
Cwmbran
Torfaen
NP44 5BD

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

29 June 2021

The Permitted Installation

The Operator is authorised to carry out the activities and/or the associated activities specified in Table 1

Table 1

Activity under Schedule 1 of the Regulations	Schedule 1 Activity Reference	Description of Specified Activity
Chapter 6 – Other Activities	Section 6.4 – Coating Activities, Printing and Textile Treatments	Part B (a) (iv) >15 tonnes solvent Used for the printing and coating of metal packaging.

The current process guidance note for this installation is PG 6/7(11)

Permit Conditions

Emission Limits and Controls

1. All emissions to air other than condensed water vapour shall be free from persistent visible emissions and free from droplets.
2. Emissions from the combustion process in normal operation shall be free from visible smoke and no emission from the stack shall exceed the equivalent of Ringelmann Shade 1 as described in British Standard BS 2742:1969.
3. There shall be no offensive odour beyond the site boundary as perceived by the Regulator.
4. No result obtained from a non continuous monitoring exercise, carried out to comply with the Emissions Monitoring Protocol contained in Appendix 3, shall exceed the specified emission limits values as detailed below in Table 2.

Table 2

Row Number	Pollutant	Source	Concentration Limit Value	Monitoring Type & Frequency
1	Volatile Organic Compounds (VOC) Other than from mixing vessels, organic solvent cleaning or degreasing operations or chemical stripping operations	Oxidation Plant	VOC (expressed as total carbon excluding particulate matter) 50mg/m³	Annual Manual Extractive
2	Volatile Organic Compounds (VOC) From mixing vessels, organic solvent cleaning or degreasing operations or chemical stripping operations where a) The individual source gives rise to a mass emission of non-chlorinated volatile organic compounds which exceed 1kg in any 8-hour period b) The individual source gives rise to a mass emission of chlorinated volatile organic compounds which exceeds 1% of the total solvent holding capacity of the equipment in any 8-hour period	Contained Sources	VOC (expressed as total carbon excluding particulate matter) 50mg/m³	Annual Manual Extractive
3	Carbon Monoxide	Oxidation Plant	100 mg/m³ 15 minute mean	Annual Manual Extractive
4	Oxides of Nitrogen (measured as nitrogen dioxide)	Oxidation Plant	100 mg/m³ 15 minute mean	Annual Manual Extractive

Monitoring, Sampling and Measurement of Emissions

5. Emissions from oxidiser shall be continuously monitored and recorded for temperature
6. Each instrument required for Condition 5 above shall be fitted with visual and/or audible alarms that activate at a reference level that has been agreed in writing with the Regulator. Emission events that lead to activation of the alarms shall be electronically recorded.
7. The continuous temperature monitoring equipment shall be operated, maintained, serviced, calibrated or referenced in accordance with the manufacturer's instructions. Details of manufacturer's calibration/reference recommendations shall be made available to the Regulator.
8. All continuous monitoring results shall be on immediate display to operating staff. Continuous temperature monitoring results, charts or records shall be retained by the operator for a minimum of 2 years and made available for examination within seven working days of any request by the Regulator
9. Any order for the replacement of continuous monitoring equipment with new equipment shall specify the requirement for less than 5% downtime over any 3 month period of operation.
10. Visual and olfactory assessments of emissions from the oxidiser stack shall be made at least once per day under normal operating conditions and recorded in a log book. The log book shall be retained by the operator for a minimum of 2 years and made available for examination within seven working days of any request by the Regulator.
11. The monitoring point for visual assessment of emissions required by Condition 10 above shall be as marked on the site plan detailed in Appendix 2.
12. The concentration of pollutants, listed in Table 2 above, in emissions to air from the Exothermic Eclipse oxidiser stack shall be determined at least once annually, unless otherwise requested by the Regulator. The test methods as specified in Table 3 below, or other methods that can be demonstrated to be equivalent, shall be used.
13. All pollutant concentrations to be expressed at reference conditions 273K, 101.3kPa, without correction for water vapour content unless stated otherwise.
14. The introduction of dilution air to achieve an emission concentration limit is not permitted.
15. The use of odour masking agents and counteractants is not permitted.

Table 3

Pollutant	Test Method
Volatile Organic Compounds	BS EN 13526
Carbon Monoxide	BS EN 15058
Oxides of Nitrogen (measured as nitrogen dioxide)	BS EN 14792

Source: Environment Agency Technical Guidance Note M2 August 2007

1 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.

Stacks and Ductwork

- 16.** The Exothermic Eclipse oxidiser shall be permanently ducted to a flue contained within the chimney the height of which shall be 3 metres above roof ridge height of any building within a distance of 5 times the uncorrected chimney height and in any event at least 8 metres above ground level. The chimney shall discharge vertically upwards and shall not be fitted with any restriction at the final opening, such as a cap or cowl.
- 17.** Stacks and associated ductwork shall be insulated as necessary to minimise the cooling of waste gases and prevent liquid condensation on internal surfaces. Chimney flues and ductwork shall be cleaned regularly to prevent accumulation of materials.
- 18.** The operator shall ensure that adequate facilities for sampling are provided on vents and ducts.
- 19.** Chimney or process vents shall be designed for an efflux velocity of not less than 15m/sec at normal load operation when dry arrestment is used.

Notifications

- 20.** The Regulator shall be advised in writing (e-mail acceptable), at least 7 days in advance of any periodic monitoring exercise to determine compliance with emission limit values, of the provisional time and date of monitoring, pollutants to be tested and the methods to be used.
- 21.** The operator shall notify the Regulator, in writing, at least 14 days prior to implementation of any intended change to the installation, which may have an impact on emissions to air. The notification shall include an

assessment of the possible effects of the proposed change on the environment.

22. The Operator shall notify the Regulator without delay of the detection of any fugitive emission, plant malfunction/breakdown, and the failure of techniques or accident that has caused or is likely to cause air pollution.

Reporting Requirements

23. A summary of continuous temperature monitoring results for temperature shall be retained by the operator for a minimum of 2 years and made available for examination within seven working days of any request by the Regulator.
24. Results of the annual emission testing requirements as specified in Condition 12 above, together with the results of any other non continuous emission testing carried out, shall be forwarded as a report to the regulator within 8 weeks of the completion of sampling.
25. In any case where non-compliance with any specified emission limit value is identified by periodic testing, a report detailing the cause and extent of the problem and the remedial actions taken/proposed shall be submitted to the regulator within 28 days of the results being made available.
26. A detailed solvent inventory shall be kept. This shall include cleaning solvent usage, diluent solvent usage and the solvent or VOC content of, and quantity of coatings purchased. The inventory shall also include all solvents removed from site as waste, any quantities recovered for re-use, the volatile organic compounds content of any non-compliant coatings used and the quantity of any chlorinated solvents used for metal cleaning or de-greasing. The inventory shall be forwarded to the Local Authority at least once per annum.

Materials Handling and Processing

27. Spillage containment kerbs shall be provided to areas for storage of materials containing organic solvents in drums. The floor and containment kerbs shall be impervious and resistant to the liquids in storage and designed in such a way that no stored liquid can enter the drainage system.
28. The cleaning of plant and equipment shall be carried out in such a way that emissions of volatile organic compounds to air are prevented or controlled to meet the emission limits set out in Condition 4 above.

- 29.** Cleaning operations shall be reviewed regularly to identify cleaning steps which can be eliminated.
- 30.** Where manual cleaning is unavoidable:
- (a) Cleaning solvents shall be kept in enclosed containers whilst not in active use
 - (b) Wiping cloths and brushes should be either pre-impregnated, or using a dispenser or similar device, be impregnated with cleaning solvent in a controlled manner
 - (c) Used wiping cloths and brushes shall be stored in enclosed containers pending recovery or disposal
- 31.** Emissions from curing ovens shall be adequately contained, for example by the use of end zone exhaust ventilation. Emissions from flash-off zones and coating application areas shall be adequately contained by local exhaust ventilation.
- 32.** Curing ovens, flash-off and coating application areas shall be exhausted to suitable arrestment equipment where necessary to meet the requirements of conditions 1, 3 and 4 of this authorisation.
- 33.** The oven temperature shall be controlled to minimise the emission of higher boiling organic containing breakdown products. This shall be achieved by the use of thermostatically controlled ovens incorporating burner modulation controls to ensure that the oven temperature is minimised and consistent with curing requirements of the coating.
- 34.** All potentially odorous waste materials, for example waste cleaning solvents, shall be stored in suitably enclosed containers.
- 35.** The storage of nominally empty drums which have previously contained materials containing volatile organic compounds or other odorous substances shall be affected in a manner to prevent the emission of volatile organic compounds and odours to air.
- 36.** All ovens, ductwork and ancillary equipment shall be maintained in a condition which does not allow leakage of exhaust gases from flanges, joints or areas of corrosion.
- 37.** Emissions from the emptying of mixing or storage vessels and the transfer of coating to the application area shall be contained by the use of closed delivery systems.

General Operations

- 38.** Effective preventative maintenance shall be employed on all plant and equipment concerned with the control of emissions to the air. Essential

spares and consumables, in particular those subject to continual wear, shall be held on site or be available at short notice from suppliers, in order to rectify breakdowns rapidly.

- 39.** Any malfunction or breakdown leading to abnormal emissions shall be dealt with promptly and process operations adjusted until normal operations can be restored. All such malfunctions shall be recorded in the log book. If there is likely to be an effect on the local community, Torfaen County Borough Council shall be informed without delay.
- 40.** Where malfunction, breakdown or failure of arrestment plant leads to excursion conditions a maximum period of operation under such conditions should be agreed with Torfaen County Borough Council. The time and duration of excursion conditions, causes and corrective actions should be recorded in the log book required under Condition 19 above.
- 41.** Staff at all levels shall receive formal training and instruction in their duties relating to control of the process and emissions to air. Particular emphasis shall be given to training for start-up, shut down and abnormal conditions. Staff training records shall be made available to the regulator on request.
- 42.** A high standard of housekeeping shall be maintained at all times.

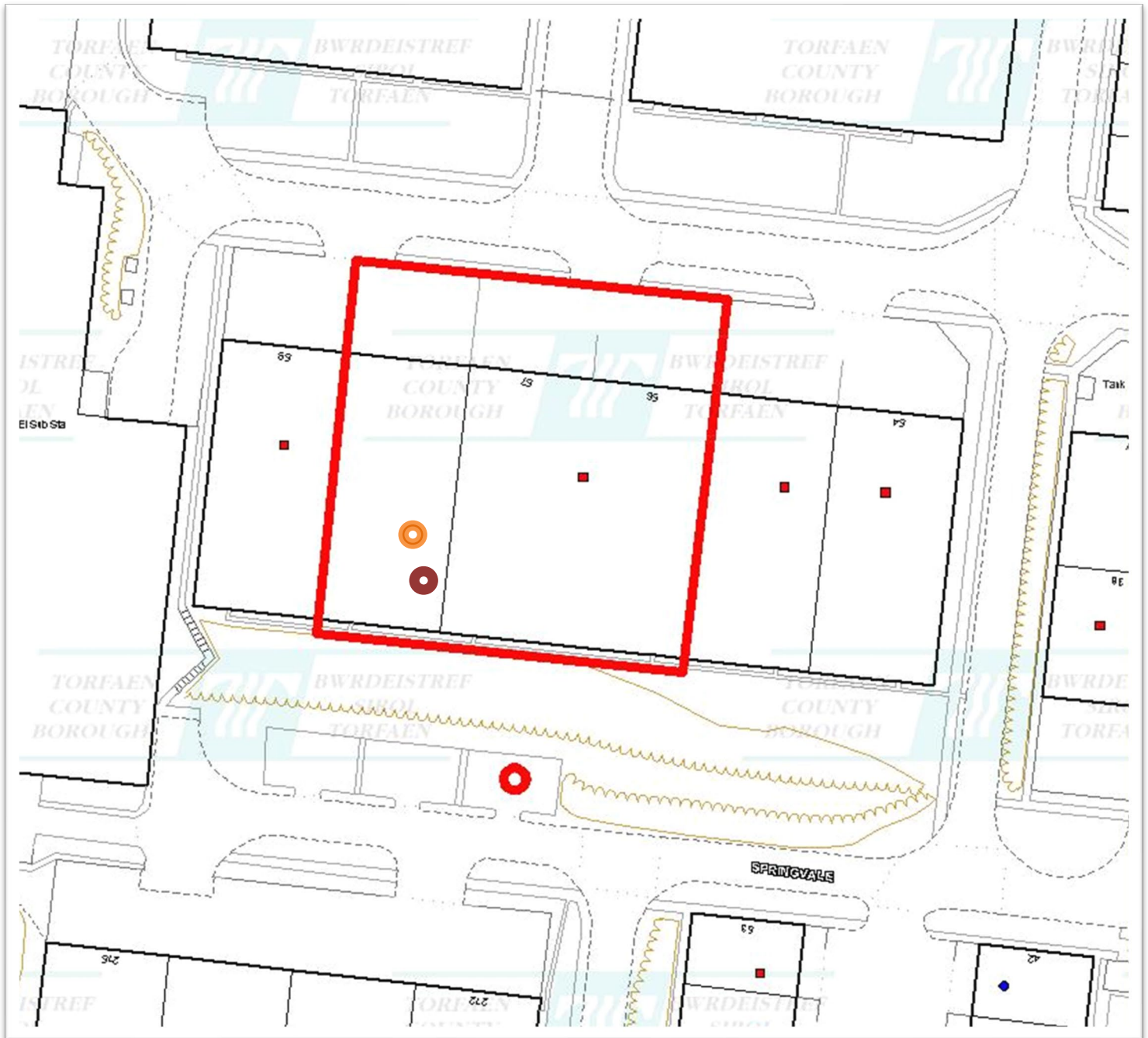
Appendix 1 - Definitions

“Regulator”	Torfaen County Borough Council, Planning and Public protection Department
“Operator”	Cyril Luff (Metal Decorators) 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 2016 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 2016 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 2016

Appendix 2 - Site Plan

The activities authorised under the conditions of this permit shall not extend beyond the Site, being the area shown edged in red on the plan below.

- Is the location for visible emissions monitoring.
- Is the location of the Exthermic Eclipse oxidiser emission point.
- Is the location of the bypass emission point.



Appendix 4 Emission Monitoring Protocol

Calibration and compliance monitoring should meet the following requirements as appropriate.

No result should exceed the emission concentration limits specified, except where either:

- (a) data is obtained over at least 5 sampling hours in increments of 15 minutes or less; or
- (b) at least 20 results are obtained where sampling time increments of more than 15-minute are involved; **AND** in the case of (a) or (b)
- (c) no daily mean of all 15-minute mean emission concentrations should exceed the specified concentration limits during normal operation (excluding start-up and shut-down); and
- (d) no 15-minute mean emission concentration should exceed twice the specified emission concentration limits during normal operation (excluding start-up and shut-down)

VOC Monitoring

For periodic measurements of VOC 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, and
- (b) none of the hourly averages exceeds the emission limit values by more than a factor of 1.5*

* the hourly average of the 15-minute means value may be used to demonstrate compliance.

END OF PERMIT