Bath & North East Somerset Council

Hereby permits:

Beechcraft Limited, Units 27/28, Westfield Industrial Estate, Midsomer Norton, Bath BA3 4BS

To operate a Part B installation at:

Beechcraft Limited, Units 27/28, Westfield Industrial Estate, Midsomer Norton, Bath BA3 4BS

Under the provisions of:

POLLUTION PREVENTION AND CONTROL ACT 1999

ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2016

Permit reference:

EP 021/3

Signed on behalf of Bath and North East Somerset Council

Signed:  Date: 10th March 2025

Anna Szrajbman

Specialist Officer – Water & Environmental Permitting
An authorised officer of the Council

INTRODUCTORY NOTE

This introductory note does not form part of the permit.

This Environmental Permit (the Permit) is issued by Bath and North East Somerset Council (the Council) under Regulation 13(1) of the Environmental Permitting (England and Wales) Regulations 2016 (S.I. 2016 No.1154), to operate an installation prescribed in Schedule 1, Part 2, Section 6.4, Part B of those regulations to the extent specified in the conditions of this permit.

The requirements of this Permit shall be effective from the date of service unless otherwise specified within the Permit. Where a Variation Notice has been served, the conditions contained within that Variation Notice shall be effective from the date that the Notice is served, unless a specific implementation date is allocated to specific conditions.

For the purpose of this Permit, the legal operator of the installation is **Beechcraft Limited, Units 27/28, Westfield Industrial Estate, Midsomer Norton, Bath BA3 4BS.**

This Permit contains specific conditions that must be complied with. It shall be noted that aspects of the operation of the activity which are not regulated by Permit conditions are subject to the guidance and recommendations detailed within the **Process Guidance Note 6/23 (11) (Revised June 2014) Statutory guidance for coating of metal and plastic processes.** The Operator shall use the best available techniques for preventing or, where that is not practicable, reducing emissions from the installation.

DESCRIPTION OF AUTHORISED ACTIVITY

The coating of metal and plastic process is as prescribed by Section 6.4 of the Environmental Permitting (England and Wales) Regulations 2016, where solvent consumption of the coating activity is 5 tonnes or more in any 12 month period.

The installation manufactures, paints and silk screens Rigid Polyurethane (RIM Technology) mouldings which are used as covers/enclosures mainly within the medical and scientific sectors.

The installation is split into four main production areas:

1. Production;
2. Trimming, filling and pre-paint inspection;
3. Spray shop; and
4. Silk screening and quality assurance.

Raw materials are delivered to the relevant production area.

Production

Mouldings are produced by four Canon PU dispensing machines using a mixture of **polyol resin** and **isocyanates** within a contained pressurised system.

Methylene chloride is used to clean the head of the Canon B15 PU machine.

A water-based release agent is used so that the mouldings can be detached from the moulding tool.

Empty polyol resin and isocyanate drums are drums are sealed and placed in a locked storage area. They are palletised, shrink-wrapped and collected by an appropriate licensed waste carrier.

Empty methylene chloride drums are collected by Barrettine (the manufacturer of the product) for recycling.

Trimming, filling and pre-paint inspection

The raw mouldings are trimmed of flash, sandblasted, filled using **Upol polyester filler, Polyfilla and acrylic red putty**, sanded utilising two dry back booths, then checked for imperfections and masked up if required prior to painting.

Spray shop

The mouldings are spray painted. The spray booth contains three individual manual booths each using solvent based coatings - **primer, RFI and topcoat**. There is one electric paint drying oven within the facility. The spray booths operate using a Binks wet back arrestment system served by two stacks leading to atmosphere. The wet back systems arrest VOC and particulate matter, and the sludge produced is periodically collected using an appropriate licensed waste carrier. The system is subject to continuous monitoring and annual manual extractive testing.

Empty paint and solvent tins are sealed and then placed into a locked storage area. They are palletised, shrink-wrapped and collected by an appropriate licensed waste carrier.

Silk screening and Quality assurance

The painted mouldings are de-masked and any additional fittings applied. The mouldings are silk screened if required using **specialist silk screening ink**.
Empty ink tins are sealed and then placed in the same waste stream as the empty paint tins.

Final inspection takes place before the goods are packaged and dispatched to the customer.

The company is accredited to ISO 9001.

STATUS LOG

The status log sets out the permitting history.

STATUS LOG			
DETAIL	**REFERENCE**	**DATE**	**COMMENTS**
Permit Issued	EPA 021/V1	28.09.2000	Permit issued to Beechcraft Limited
Variation Notice & Permit	EPA 021/V2	30.04.2003	
Variation Notice & Permit	LAPPC 021	08.10.2007	
Variation Notice & Permit	EP 021	07.10.2008	
Variation Notice & Permit	EP 021/2	05.05.2017	Variation following permit review
Variation Notice & Permit	EP 021/3	10.03.2025	Variation to deadline of annual monitoring data report submission

End of Introductory Note

PERMIT CONDITIONS

Emission limits and monitoring

1. The following emission concentration limits shall apply, as detailed in Table 1 and Table 2 below. Monitoring frequencies shall also follow that stated in Table 1 and Table 2, and annual monitoring data shall be sent to the regulator by the end of April each year.

Table 1 – Non VOC emission limits and monitoring

Substance	Source	Emission limits	Monitoring frequency
Particulate matter	All processes / activities	50mg/Nm^3 as 30 minute mean for contained sources	Annual manual extractive testing
Isocyanates	All processes / activities	0.1mg/Nm^3 as a 30 minute mean for contained sources excluding particulate and expressed as NCO	Annual manual extractive testing

Table 2 – VOC emission limits and monitoring

Substance	Source	Emission limits	Monitoring frequency
VOC	All processes / activities, particularly the spray booth	VOC expressed as total mass of organic carbon 100mg C/Nm^3	1. Continuous monitoring and recording 2. Annual manual extractive testing
VOC	Fugitive emissions	25% of organic solvent input	Calculated annually as part of the Solvent Management Plan

Solvent management plan

2. The operator shall submit an annual Solvent Management Plan (SMP), as per Appendix II of this permit. The SMP shall include the calculation for fugitive VOC emissions as required by Table 2, and be submitted to the regulator no later than the end of April each year.

Monitoring, investigating and reporting

3. The operator shall keep records of inspections, tests and monitoring, including all non-continuous monitoring, inspections and visual assessments. Records shall be :

    - kept on-site;
    - kept by the operator for at least two years; and
    - made available for the regulator to examine.

4. If any records are kept off-site they shall be made available for inspection within one working week of any request by the regulator.

Information required by the regulator

5. The operator shall notify the regulator at least 7 days before any periodic monitoring exercise to determine compliance with emission limit values. The operator shall state the provisional time and date of monitoring, pollutants to be tested and the methods to be used.

6. The results of non-continuous emission testing shall be forwarded to the regulator within 8 weeks of completion of the sampling.

7. 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 obtained. The operator shall:

    - identify the cause and take corrective action;
    - clearly record as much detail as possible regarding the cause and extent of the problem, and the remedial action taken;
    - re-test to demonstrate compliance as soon as possible; and
    - inform the regulator of the steps taken and the re-test results.

Visible emissions

8. Emissions from combustion processes in normal operation shall be free from visible smoke. During start up and shut down, the emissions shall not exceed the equivalent of Ringelmann Shade 1 as described in British Standard BS 2742.

9. All other releases to air, other than condensed water vapour, shall be free from persistent visible emissions.

10. All emissions to air shall be free from droplets.

Emissions of odour

11. There shall be no offensive odour outside the site boundary, as perceived by the regulator.

Abnormal events

12. In the case of abnormal emissions, 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 actions taken.

13. The regulator shall be informed without delay, whether or not there is related monitoring showing an adverse result:

    - 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 arrestment plant, for example, bag filtration plant or scrubber units.

14. The operator shall provide a list of key arrestment plant, and shall have a written procedure for dealing with its failure, in order to minimise any adverse effects.

15. In cases of non-compliance causing immediate danger to human health, or threatening to cause an immediate significant adverse effect upon the environment, operation of the activity must be suspended. All of the following criteria shall be taken into account:

    - the toxicity of the substances being released;
    - the amount released;
    - the location of the installation; and
    - the sensitivity of the receptors.

Continuous monitoring

16. All continuous monitoring readings shall be on display to appropriately trained operating staff.

17. Instruments shall be fitted with audible and visual alarms, situated appropriately to warn the operator of arrestment plant failure or malfunction.

18. The activation of alarms shall be automatically recorded.

19. All continuous monitors shall be operated, maintained and calibrated (or referenced, in the case of indicative monitors) in accordance with the manufacturers' instructions, which shall be made available for inspection by the regulator.

20. The relevant maintenance and calibration (or referencing, in the case of indicative monitors) shall be recorded.

21. Emission concentrations may be reported as zero when the plant is off and there is no flow from the stack. If required, a competent person shall confirm that zero is more appropriate than the measured stack concentration if there is no flow.

22. Any continuous monitor used shall provide reliable data >95% of the operating time, (i.e. availability >95%). A manual or automatic procedure shall be in place to detect instrument malfunction and to monitor instrument availability.

Calibration and compliance monitoring

23. For batch processes, where the production operation is complete within, say, 2 hours, then the extractive sampling shall take place over a complete cycle of the activity.

24. For extractive testing, no result of monitoring shall exceed the emission limit concentrations specified.

25. The introduction of dilution air to achieve emission concentration limits shall not be permitted.

Continuous monitoring of VOC abated releases

26. For periodic measurements of VOC, at least three readings must be obtained during each measurement exercise.

27. VOC emission limit values shall be considered to be complied with if, in one monitoring exercise:

    - the average of all the readings does not exceed the emission limit values, and

    - none of the hourly averages exceeds the emission limit value by more than a factor of 1.5 (the hourly average of the 30 minute means value may be used to demonstrate compliance).

Representative sampling

28. Sampling points on new plant shall be designed to comply with the British or equivalent standards.

29. The operator shall ensure that relevant stacks or ducts are fitted with facilities for sampling which allow compliance with the sampling standards.

Start-up and shut-down

30. The number of start-ups and shut-downs shall be kept to the minimum that is reasonably practicable.

31. All appropriate precautions shall be taken to minimise emissions during start-up and shut-down.

Non-VOC releases control techniques

32. Operations likely to generate particulate matter shall be continuously monitored to indicate the performance of the abatement plant, by using equipment such as a pressure drop indicator.

VOC and odour control storage

33. All potentially odorous waste materials shall be stored in suitable closed containers or bulk storage vessels, where appropriate vented to suitable abatement plant.

VOC control handling

34. Raw materials containing VOC shall be stored in closed storage containers.

35. All measures shall be taken to minimise VOC emissions during mixing, i.e. the use of covered or closed mixing vessels.

36. Emissions from the emptying of mixing vessels and transfer of materials shall be adequately contained, preferably by the use of closed transfer systems. This may be achieved by the use of closed mobile containers, containers with close-fitting lids, or, preferably, closed containers with pipeline delivery.

VOC control cleaning

37. Cleaning operations involving organic solvents shall be periodically reviewed, at least once every two years, to identify opportunities for reducing VOC emissions (e.g. cleaning steps that can be eliminated or alternative cleaning methods). The regulator shall be provided with a report on the conclusions of the review.

38. Application of cleaning solvents shall be:

    - from a contained device or automatic system when applied directly onto machine rollers; and

    - dispensed by piston-type dispenser or similar contained device, when used on wipes.

39. When organic solvent is used on wipes:

    - pre-impregnated wipes shall be held within an enclosed container prior to use;

    - where practicable, no organic solvent cleaning fluids or significantly less volatile organic solvents cleaning fluids shall be used (with or without the addition of mechanical, chemical or thermal enhancements).

40. Where practicable, fixed equipment shall be cleaned in-situ and such equipment shall, where practicable, be kept enclosed whilst cleaning is carried out.

41. Where equipment is cleaned off-line (such as screens, plates, drums, rollers and coating / ink trays) cleaning shall be carried out using enclosed cleaning systems wherever possible. Enclosed cleaning systems shall be sealed to prevent emissions whilst in operation, except during purging at the end of the cleaning cycle. If this is not practicable, emissions shall be contained and vented to abatement plant where necessary.

42. Residual ink / coating contained in parts of the application equipment shall be removed prior to cleaning.

VOC control operational

43. Programmable scales shall be used during the mixing and preparation of inks / coatings to reduce organic solvent usage.

44. A programme to monitor and record the consumption of inks / coatings / organic solvent against product produced shall be used to minimise the amount of excess organic solvent / coating / ink used.

VOC control waste

45. All reasonably 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.

46. Prior to disposal, empty drums and containers contaminated with organic solvent shall be closed to minimise emissions from residues during storage, and labelled so that all personnel who handle them are aware of their contents and hazardous properties.

47. 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.

48. 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.

Dust and spillage control

49. Dusty wastes shall be stored in closed containers and handled in a manner that avoids emissions.

50. Dry sweeping of dusty materials shall not normally be permitted unless there are environmental or health and safety risks in using alternative techniques.

51. Suitable organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas.

52. A high standard of housekeeping shall be maintained.

Stacks, vents and process exhausts

53. Flues and ductwork shall be cleaned to prevent accumulation of materials, as part of the routine maintenance programme.

Management systems

54. The operator shall ensure that spares and consumables for arrestment plant are held on site, or available at short notice from guaranteed, local suppliers, so that plant breakdowns can be rectified rapidly.

55. The operator shall put in place some form of structured environmental management approach.

Training

56. All staff whose functions could impact on air emissions from the activity shall receive appropriate training on those functions including:

    - awareness of their responsibilities under the permit;

- steps that are necessary to minimise emissions during start-up and shut-down;

- actions to take when there are abnormal conditions, or accidents or spillages that could, if not controlled, result in emissions.

57. The operator shall maintain a statement of training requirements for each post with the above mentioned functions, and keep a record of the training received by each person. These documents shall be made available to the regulator on request.

Maintenance

58. The operator shall have the following available for inspection by the regulator:

- a written maintenance programme for all pollution control equipment; and

- a record of maintenance that has been undertaken.

End of Conditions

FURTHER INFORMATION

Confidentiality

The Permit requires the Operator to provide information to Bath & North East Somerset Council. The information will be placed on a public register in accordance with the requirements of the EP Regulations. If the Operator considers that any information provided is commercially confidential, it may apply to Bath & North East Somerset Council to have such information withheld from the register as provided in the EP Regulations. To enable Bath & North East Somerset Council to determine whether or not the information is commercially confidential, the Operator should clearly identify the information in question and should specify clear and precise reasons.

Changes to the Operation

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.

Variations to the Permit

This Permit may be varied in the future. If at any time the activity or any aspect of the activity regulated by the Permit conditions changes such that the conditions no longer reflect the activity and require alteration, then an application form providing these details shall be submitted to the Regulator. Please contact the Regulator for an application to vary the Permit conditions.

Surrender of the Permit

Where an Operator intends to cease the operation of the installation (in whole or in part), then an application form providing these details shall be submitted to the Regulator. Please contact the Regulator for an application to surrender the Permit.

Transfer of the Permit or part of the Permit

Before the Permit can be wholly or partially transferred to another person, a joint application to transfer the Permit must 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 Local Authority 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. Please contact the Regulator for an application to transfer the permit.

Responsibility under workplace health and safety legislation

This Permit is given in relation to the requirements of the EP Regulations. It must not be taken to replace any responsibilities you may have under workplace health and safety legislation.

Appeals

Anyone who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State for the Environment or the Secretary of State for Wales, as appropriate. Appeals must be received by the appropriate Secretary of State no later than 6 months from the date of the decision (normally the date on the bottom of the Permit).

Appeals relating to processes in England and Wales should be sent to the Planning Inspectorate at the following address:

The Planning Inspectorate
Environment Appeals Team
3A Eagle Wing
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

Guidance on the appeals procedure is contained in Regulation 31 and Schedule 6 of the EP Regulations.

The appeal must be in the form of a written notice or letter stating that the Operator/person wishes to appeal, and must list the condition(s) which is/are being appealed against. For an appeal to be valid, the following items **must** be included:

a) a statement of the grounds of appeal
b) a statement indicating whether the appellant (the person making the appeal) wishes the appeal to be dealt with:
    - by a hearing attended by both parties and conducted by an Inspector appointed by the Secretary of State, or
    - by both parties sending the Secretary of State written statements of their case (and having the opportunity to comment on one another's statements)
c) a copy of any relevant application
d) a copy of any relevant permit
e) a copy of any relevant correspondence between the appellant and the Regulator
f) a copy of any decision or notice which is the subject matter of the appeal.

At the same time, the Notice of Appeal and documents a) and b) must be sent to the Council, and the appellant should inform the appropriate Secretary of State that this has been done.

Please Note

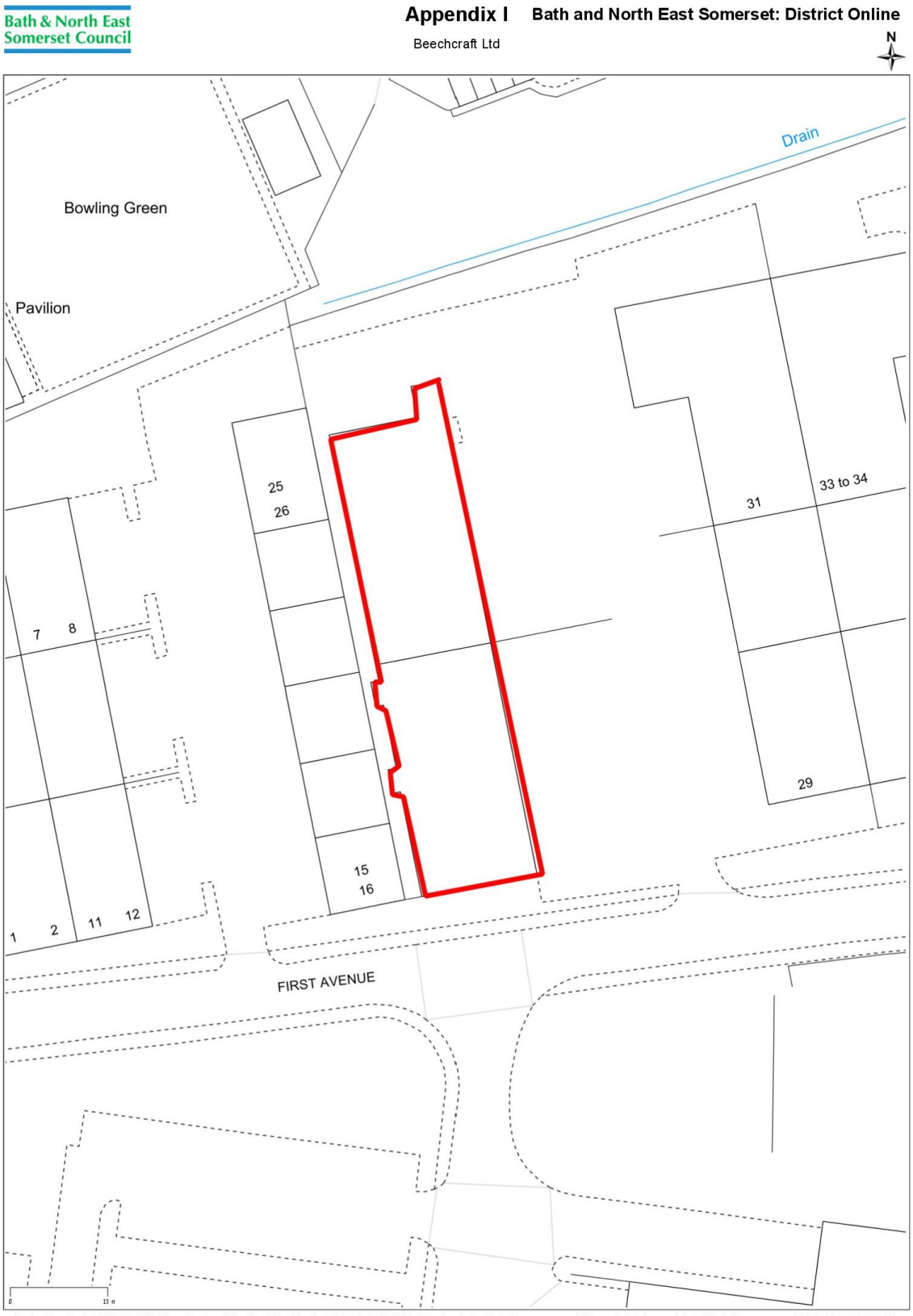
- An appeal will **not** suspend the effect of the conditions appealed against; the conditions must still be complied with.
- In determining an appeal against one or more conditions, the Act allows the Secretary of State in addition to quash any of the other conditions not subject to the appeal and to direct the Local Authority either to vary any of these conditions or to add new conditions.
- You will be liable for prosecution if you fail to comply with the conditions of this Permit. If found guilty, the maximum penalty for each offence if prosecuted in a Magistrates' Court is an unlimited fine and/or 6 months imprisonment. In a Crown Court it is an unlimited fine and/or 5 years imprisonment.

Contact details of the Regulator

Bath & North East Somerset Council
Public Protection Service
Keynsham Civic Centre
Market Walk
Keynsham
BS31 1FS

Tel: 01225 396693
Fax: 01225 477596
Email: environmental_monitoring@bathnes.gov.uk
www.bathnes.gov.uk

Appendix I: Location Plan



Appendix II: Solvent Management Plan

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 Industrial Emissions Directive requires a Solvent Management Plan to demonstrate compliance fugitive emission limits and give the public access to information about solvent consumption etc.

The Industrial Emissions Directive provides guidance on what constitutes a solvent input and an output. 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.

The definitions in Annex VII Part 7 of the Industrial Emissions Directive are as follows and are shown diagrammatically in **Figure 4.1** on page 28 of Process Guidance Note 6/23(11).

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.

Consumption = **I1** - **O8**

Actual solvent emission = **I1 – O5 – O6 – O7 - O8**

Fugitive emission (F) = **I1 – O1 - O5 – O6 – O7 - O8**
OR
Fugitive emission (F) = **O2 + O3 + O4 + O9**

Fugitive emission value = **F ÷ (I1** + **I2)** × **100%**

Total emission = **O1 + Fugitive emission (F)**