

Sandwell Stripping Ltd.  
Unit 3  
Gupta Trading Estate  
West Bromwich Street  
Oldbury  
West Midlands  
B69 3AP  
United Kingdom

Sandwell Metropolitan Borough Council  
Public Health Department  
P.O. Box 15888  
Oldbury  
West midlands  
B69 9EN

Dear whom it may concern,

Please find a copy of a permit application for Sandwell Stripping Limited to operate under the Environmental Permitting (England & Wales) Regulations 2016. You will find the completed permit application and a Part B Application form attached.

I look forward to receiving your response.

Regards,

Sandwell Stripping Ltd.

**Application For Permitting Of A Metal Cleaning Process  
Under the Pollution Prevention and Control Act 1999 and Environmental  
Permitting (England & Wales) Regulations 2016**

**for**

**Sandwell Stripping Limited**

**Unit 3  
Gupta Trading Estate  
W Bromwich Street  
Oldbury  
West Midlands  
B69 3AP**

### **A1.1 APPLICATION SUMMARY**

The installation is as follows; -

**Sandwell Stripping Limited**

### **A1.2 INSTALLATION ADDRESS**

The address of the installation is as follows;-

**Unit 3  
Gupta Trading Estate  
W Bromwich Street  
Oldbury  
West Midlands  
B69 3AP**

### **A1.3 EXISTING PERMITS**

The Pollution Prevention and Control Regulations (England and Wales) 1999 and Environmental Permitting (England & Wales) Regulation 2016 place duties, via regulations, upon the operators of specified processes.

The processes used at Sandwell Stripping Limited encompass the use of surface cleaning technologies as used in the stripping of painted components, which are currently detailed in the above regulations for permitting and control by Sandwell Metropolitan Borough Council, Environmental Health and Trading Standards

This permit application is made in accordance with those provisions detailed by Local Authority and Guidance Note PG 6/45 (11). The assessments of these processes and their environmental effects are detailed within this application.

**At present the site has no existing permit(s).**

### **A2.1 OPERATOR DETAILS**

The operator is; -

**Sandwell Stripping Limited**

The Registered Office is; -

**Unit 3  
Gupta Trading Estate  
W Bromwich Street  
Oldbury  
West Midlands  
B69 3AP**

### **A2.2 HOLDING COMPANIES**

There is no holding company involved with the installation.

**A3.1** The site contact is - Manager.

**B1.1** Installation table for new permit

<b>COLUMN 1a</b>	<b>COLUMN 2a</b>
<b>Activities in the Stationary Technical Unit</b>	<b>Schedule 1 References</b>
Surface Cleaning of Metal	Section
<b>COLUMN 1b</b>	<b>COLUMN 2b</b>
<b>Directly associated activities</b>	<b>Schedule 1 References</b>

### **B1.2 REASON FOR THE APPLICATION**

The reason why the application is being made is that metal cleaning and treatment activities operated at the site will be encompassed under the provisions of Pollution Prevention and Control Regulations, Process Guidance Note PG 6/45, and the Solvent Emissions Directive, in respect of releases of volatile organic compounds (VOCs) including chlorinated hydrocarbons.

### B1.3 SITE LOCATION

The facility is located in an industrialised area located at Gupta Trading Estate, W Bromwich Street, Oldbury, West Midlands, OS grid reference SO9882890052.

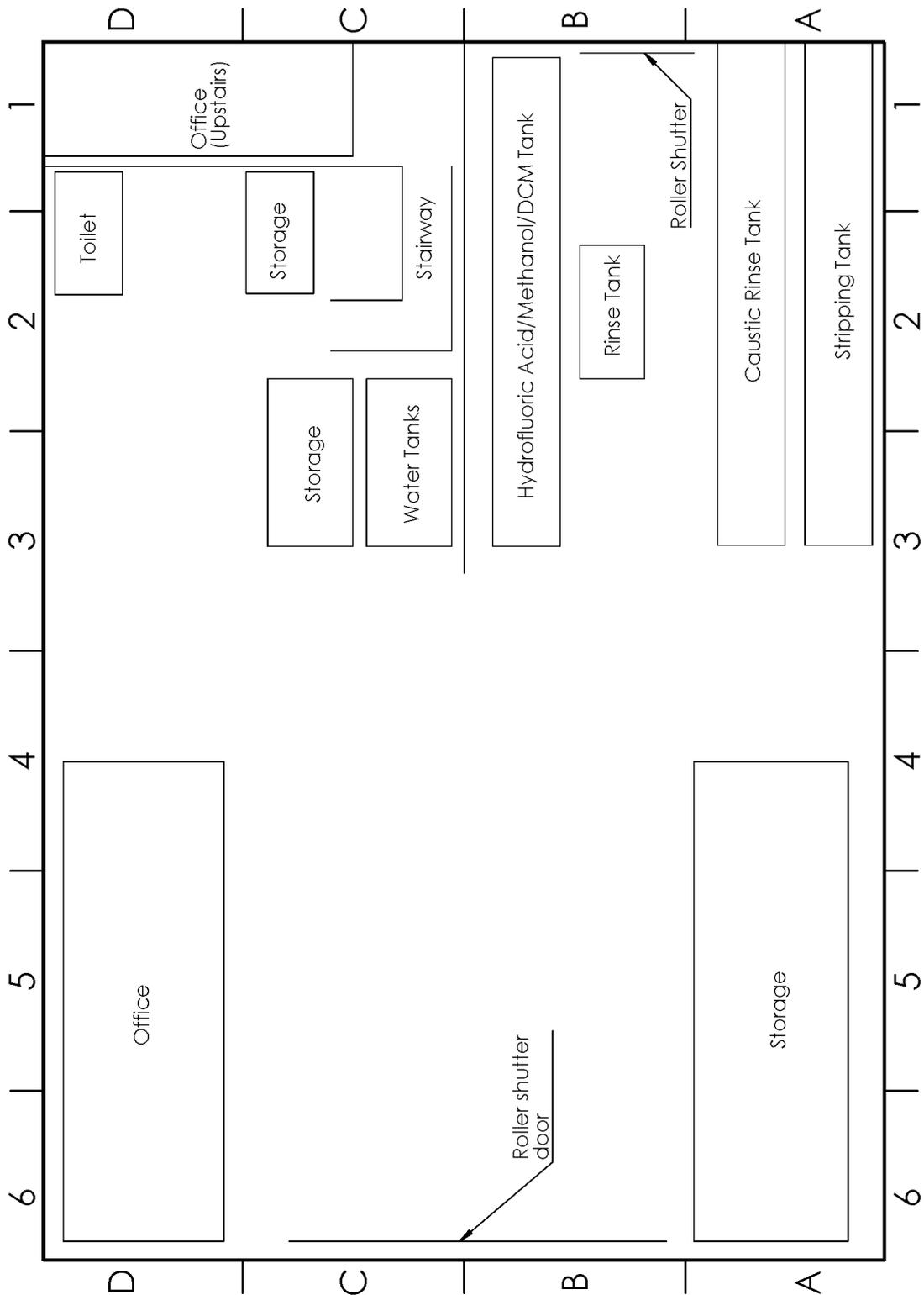
A section of the current OS map is included herein.



The installation boundary is shown outlined in red.



The following site map details the main activities and areas of the installation; -



The area immediately surrounding the site consists of industrial premises to the north, south and west. The area immediately east of the site is characterised by dense overgrowth.

The installation has no additional tenants or subtenants nor any other permanent third party businesses.

## **B2 THE INSTALLATION**

### **B2.1 INSTALLATION AND ACTIVITIES**

The installation used a range of chemical processes to strip organic based finishing coating for a wide range of supplied components and assemblies.

The stripping and cleaning process may include immersion in solvents (dichloromethane and methanol), mineral acids, (hydrofluoric and hydrochloric) or caustic (sodium hydroxide) containing tanks. These chemicals attack and degrade the organic finishes to the point where mechanical adhesion to the substrate is lost and they can be removed completely by physical means or by assisted pressure washing.

The site will operate the process on a 10-hour day system, 5 days/week for 48 weeks per annum. There may be some limited weekend working as required at times. The process will be operated by 4 personnel.

All activities encompassed within the stripping processes operated at the installation are supported by specific equipment specifications, process controls, planned maintenance, quality assurance and product verification procedures.

Each stage of the stripping process has cycle times at all stages, planned preventative maintenance programs, and in built breakdown criteria.

The building in which the processes take place are maintained at ambient temperature during production hours.

The following flow chart outlines process activities;-

#### **Operational Plan**

Details below describe the process of work received at Sandwell Stripping Limited through the paint stripping process from collection to delivery.

- 1 Upon arrival at Sandwell Stripping Limited the driver is asked to report to the office with an official purchase order with which a job card will be issued, offload is either manual or by FLT.
- 2 The work will be uploaded to the goods inwards area where it is marked with the customers' name and job number, which stays with the work until completed.
- 3 The work will be checked against the purchase order for quantity, size, paint type and damage if any, of which any discrepancies would be reported to the customer for further advice. All work is scheduled in for the appropriate date and time of processing.
- 4 Once the above has been determined, the work will be placed by hand, in the appropriate tanks for the stripping process.
- 5 Sandwell Stripping Limited use different chemicals for the removal of different types of paint, see data sheets attached.
- 6 Paint stripping times vary due to the thickness of paint, usual stripping times are up to 1 hour per coat.
- 7 All stripping tanks are monitored on a regular basis for alkalinity / acidity and specific gravities which may also be a cause for slowing the stripping process.
- 8 Upon removal from the stripping tank, work is washed down with clean water through a high pressure gun and then left to dry in the drying off area. Once the work is dry, it is then inspected and if there are any rejects they will be placed back into the tank for re-processing.

- 9 When the job is completed, the work is again inspected for quantity, size and damage, where any discrepancies will be reported to the office and then the customer.
- 10 The work will then be removed for packing in the appropriate customers packaging where it is clearly marked with the customers name and address. The job number is now removed and taken to the office.
- 11 Once the job number has arrived in the office, the relevant documentation is then removed from the job rack. The customer is then notified of work completion upon which the delivery note and invoice can then be raised.
- 12 When the goods are available for delivery, the driver will report to the office, collect the delivery note and the goods will be despatched to the vehicle.

All process deliveries will enter the site via the Goods Inwards.

All process material deliveries will be off loaded in a dedicated, purpose built, bunded area.

#### **(i) Chemical Delivery, Use, Storage and Disposal**

The installations chemical storage is located within the site's existing buildings on substantial, reinforced concrete.

In establishing suitable control measures for the delivery of raw materials site management ensure that; -

1. All containment vessels are bone fide, purpose built.
2. All containment structure is purpose built in accordance with engineering specifications.
3. All bunding is subject to scheduled inspection record and corrective action.
4. All bunds are visually monitored using documentation.
5. All containment and bunding losses are subject to a site "Spillage & Containment" procedures.
6. All containment and bunding is subject to internal audit and services.
7. Bulk containment and enclosures are subject to British Standards in respect of suitable materials.
8. Spillage control kits are maintained on site.
9. All materials supplied to site require submission of appropriate material environmental and health & safety data sheets prior to commencement of supply.
10. All materials supplied to site are delivered in appropriate containers albeit 5, 10, 25, 50, 100, 1000 litre packages.
11. Dry materials are supplied in suitable bags.
12. Assessments of adequacy of containment are undertaken by competent personnel.
13. All localised spillages are subject to appropriate address by the site management and supervision.
14. Significant spillages are subject to immediate, formal notification of the Environment Agency.
15. All containers of product are visually inspected / examined as part of the acceptance process. Damaged containers are rejected.

16. All 25kg dry sacks are to UN standard 5H4.
17. All 1000lt IBCs are to UN Standard 31 HA1.
18. All 25lt Polyethylene containers are to UN standard 3H1 or RH1.
19. All loading / unloading activities take place on hardstanding.
20. All procedures outlined in the site's EMS are subject to 3<sup>rd</sup> party audit on a pre-scheduled basis.
21. All FLT drivers are formally made aware of what to do in the event of an accident, incident or unauthorised release of product during delivery, storage or general transport.

In regard to Pollution Prevention and Control site management have established; -

- (i) site drainage.
- (ii) site awareness training in respect of drain status.
- (iii) emergency contact numbers in the event of an incident occurring.
- (iv) specific management roles and responsibilities to deal with incidents and accidents.

The site includes maintenance areas in which machine coolants, lubricants, oils and greases, various compressed gases and fuel oils are stored on site in dedicated storage areas.

The initiatives have been developed to ensure that once process materials are in use, storage or ongoing as intermediates, plant and equipment is effectively maintained to ensure its integrity. These initiatives have been developed to be plant specific and general in application.

These measures are consistent with the site's pollution prevention practices and Pollution Prevention Guidance Notes.

Site management will pursue the lidding and containment of process vessels in respect of spill minimisation and pollution prevention and loss of chemicals to atmosphere.

Site management will assess on a schedule basis the capability in respect of emergency preparedness and score the outcome.

All non - conformances determined by inspection will be review by site management.

The site is in due process of establishing formal documentation specifically for the recording and forward planning of critical environmental performance monitoring. This documentation will be maintained for a period of no less than 4 years.

Site management are in due process of acquiring training media including the Shot In The Dark CD "Tanks, Drums, Bunds and Drains"

Site personnel will receive this presentation as a pro-active approach to awareness of integrity and containment.

## **(ii) The Waste Storage Compound**

Process wastes from the general site activities, will be stored in the installation's Waste Management Compound.

The compound is constructed using chemically resistant, re-enforced concrete in the bund and base. The exposed concrete surfaces are coated with a chemically resistant paint to ensure that impermeability is maintained.

The facility has a small sump to permit the pumping out of collected rainwater on a routine basis. The facility has locked access and maintains a fence to limit intrusion.

### **(iii) Effluent Catch Pit**

There is no authorised discharge of any process materials to storm or foul systems.

The site has a dedicated catch pit and this is routinely pumped out. The site is routinely subject to statutory inspection via the Environment Agency and STWA.

As defined in process guidance note PG 6/45, clauses and conditions are specifically detailed to encompass the following aspects of the site's extraction systems with regard to: -

- (i) Local topography
- (ii) Effective stack / chimney height
- (iii) Minimum stack / chimney height
- (iv) Chimney vent restrictors
- (v) Minimum point of exit mean velocity

The VOCs releases sourced from site activities will be discharged to atmosphere via dedicated LEV systems.

The significance of dark or black smoke will be addressed by formal procedure and by use of Ringlemann Shade Cards.

Abatement equipment, where required, will meet; -

- (i) All work place COSHH exposure limit provisions.
- (ii) All PG 6/45 emission limit provisions.
- (ii) D1 calculation provisions.

Site management are looking at prevention at source via the use of hydrogen peroxide based cleaners.

### **(iv) Ongoing Pollution Prevention and Control Activities**

Releases are minimised via the use of:

- (i) continuous monitoring of process activities
- (ii) annual compliance monitoring of VOC releases
- (iii) annual compliance monitoring of mean efflux velocity
- (iv) planned equipment maintenance
- (v) shift by shift QA/QC with respect to process control
- (vi) routine scheduled cleaning of plant and equipment
- (vii) use of trained operating and maintenance personnel

- (viii) use of best available technology
- (ix) dedicated storage facilities
- (x) dedicated primary and secondary containment
- (xi) dedicated operation control procedures and documentation
- (v) Process Controls Documents

## **B2.2 FORESEEABLE EMISSIONS**

The tanks detailed in the site map are associated with the installations activities. Any foreseeable emissions are managed by on site extraction.

### **B2.2.1 EMISSION MONITORING**

**To date there have been no specific release monitoring studies undertaken, however the installation has significant H&S monitoring data regarding the workplace environment.**

A specific study of emissions sourced from the installations' activities will be undertaken when fully operational in line with the provisions of PG 6/45.

This programme will encompass; -

Measurement of particulates using method BS 13284.

Measurement of mean efflux velocity using method BS 9096.

Measurement of VOC as C using BS 12619.

Monitoring will be undertaken by an STA member specialist company. Monitoring will be undertaken by trained and competent personnel.

The date, procedures and personnel who undertake the monitoring will be formally notified to Local Authority in accordance with PG 6/45 provisions.

All reports and data provided by the consultancy will be sent to Local Authority personnel within 8 weeks of receipt by site management.

## **B2.3 MANAGEMENT AND PREVENTION TECHNIQUES**

Site management are targeting the following initiatives and actions to achieve and maintain compliance with the provisions of the Regulations.

These include specifics with regard to ;-

- (i) Monitoring Schedules
- (ii) Preventative Maintenance Schedules
- (iii) Process Related Developments – Chemical Products
- (iv) Process Related Developments – Plant/Equipment
- (v) “Environmental” Training

## PROPOSALS FOR FUTURE MONITORING SCHEDULES

It is the continued intent of **Sandwell Stripping Limited** to comply with all monitoring procedures, continuous and non-continuous, as defined in Guidance note PG 6/45

These procedures will include the following objectives:-

- (i) Monitoring of specified analytes defined in guidance note PG 6/45
- (ii) Implementation of visual and olfactory assessment based upon daily scheduling including colour assessment of emission discharges to atmosphere.
- (iii) Documents reporting via log books, electronic data.
- (iv) Maintenance and submission (to the relevant authority) of organic chemical inventories as defined in guidance note PG 6/45
- (v) Implementation of reporting procedures to encompass exceeding of agreed and or defined permit discharge limits relevant to atmospheric emissions.
- (vi) Implementation of scheduled reassessment and review for monitoring procedures as defined in guidance note PG 6/45
- (vii) Implementation of appropriate procedures via an audit to assess compliance with the objectives of the proposals defined in this section.

## PROPOSALS FOR FUTURE PREVENTATIVE MAINTENANCE PROCEDURES

These procedures will include the following objectives:-

- (i) Continuation of existing site based preventative maintenance plan schedules.
- (ii) Continuation of preventative maintenance schedules to assess the compliance of all exhaust/extraction equipment and duct work to achieve compliance with the provision of guidance note PG 6/45 and also with the provision of the Control of Substances Hazardous to Health (COSHH) Regulations.

This work will be scheduled via a specified subcontractor.

These schedules will incorporate existing records and documentation relating to LEV (Local Exhaust Ventilation) data.

- (iii) Documented reporting via appropriate data/results logs.
- (iv) Continuation of procedures via audit to assess compliance with the objectives of the proposals defined in this section.
- (v) Continued assessment of the plant maintenance programs.
- (vi) Continued assessment of specialised sub-contract maintenance of the premises' process related plant and ancillary systems.

## **PROPOSALS FOR FUTURE PROCESS RELATED DEVELOPMENTS-CHEMICAL PRODUCTS**

Ongoing initiatives include:-

- (i) Assessment of alternative process technologies.

Options under discussion include: -

- a) Energy minimisation.
- (b) Replacement of dichloromethane “wet” strippers.

## **PROPOSALS FOR FUTURE PROCESS RELATED DEVELOPMENTS – PLANT**

- (i) It is the continued intent of site management to give full consideration to the application of BAT when developing proposals relating to plant and equipment.
- (ii) It is the continued intent of site management to give full consideration to the implementation of BPEO when developing proposals relating to plant and equipment.
- (iii) Electronic monitoring via on stream telemetry of specific process related plant.
- (iv) Commission of compliant abatement plant where appropriate.
- (v) Compliance with the provisions of the Solvent Emissions Directive.

This will encompass; -

- Defined targets for VOC reduction.
- Management strategy for planned compliance with ongoing review.
- Ascribed responsibility for aspects of conformance.
- Awareness training in respect of SED compliance.
- Disclosure of SED driven VOC inventories.

## **PROPOSALS FOR FUTURE “ENVIRONMENTAL” TRAINING**

It is the continued intent of site management to comply with the provisions of Guidance note PG 6/45 in providing relevant Training of the work force.

Ongoing initiatives will include the following objectives:-

- (i) Implementation of “PPC Awareness” training procedures of employees as to the implications of Environmental legislation.
- (ii) Implementation of training procedures relating to improved work place practices with regard to reducing emissions to atmosphere.
- (iii) Implementation of clauses (i) and (ii) will be reflected in Training Records.
- (iv) Training documentation is in due process of compilation, this to be circulated to the work force at the earliest opportunity.

## **B2.4 UNINTENTIONAL RELEASES AND THEIR CONSEQUENCES.**

In the event of abnormal operating circumstances at the site; -

- (i) all process plant can be shut down with immediate effect with regard to permitted activities.
- (ii) all burners would go into "low fire" mode and then be shut down.
- (iii) all production activities would cease within the metal treatment locality.
- (iv) site management would implant spillage and containment controls where appropriate.
- (v) site management would notify the regulator of the event, its date/time of occurrence.
- (vi) site management would isolate/evacuate the premises.
- (vii) site management would compile an "event" log and formally record all appropriate controls required.

The significant process controls operated at the site would ensure that all process releases would be terminated in the shortest possible period of operation and that secondly, the process would not be restarted until any fault had been repaired/remediated.

As such limited unauthorised releases, other than a catastrophic scenario, would be dealt with by rapid response and minimisation of environmental consequences.

In the event of a catastrophic situation such as a major fire, site management would implement their emergency procedures and leave the site to the appropriate personnel.

The relative risk and hazards presented at the site by abnormal unauthorised releases to atmosphere are considered to be of limited consequences due to: -

- (i) The low levels of VOC, combustion fume and inorganic compounds releases discharged to atmosphere even in a short - term "unintentional" event.
- (ii) The current "event driven" systems, procedures and practices operated on site, including "emergency response" initiatives.
- (iii) The level of awareness of management of the implications of environment legislation and its significance.
- (iv) The high level of awareness of the management team to the environmental implications of legislation.

***The site has no significant history of unauthorised releases.***

## **B3 IMPACT ON THE ENVIRONMENT**

### **B3.1 ASSESSMENT OF THE ENVIRONMENTAL CONSEQUENCES OF RELEASES TO THE ATMOSPHERE**

The requirements of the regulations are that a critical assessment of the environmental consequences of potential releases should be made, and these can be summarised as follows: -

The site maintains ongoing Technical and EH&S Data Sheets on all products used on inline process operations in defined locations.

The principal components of site-sourced releases, detailed in PG 6/45, are detailed below with specific reference to their potential impact in the event of potential release to the atmosphere.

The Environmental Consequences of releases to the atmosphere by those analytes defined in Guidance note PG 6/45 have been addressed in specific detail.

The main components of the stripping process releases will be the volatile organic compounds, dichloromethane and methanol.

#### **Dichloromethane – Environmental Impact**

Large quantities of dichloromethane are used each year, primarily in aerosols, paint removers and chemical processing.

The major route of human exposure is from air, which can be high near sources of emission, and contaminated drinking water. Most of the dichloromethane will be released to the atmosphere where it will degrade by reaction with photochemically produced hydroxyl radicals with a half-life of a few months. It will be subject to direct photolysis.

Releases to water will primarily be removed by evaporation. Biodegradation is possible in natural waters but will probably be very slow compared with evaporation. It will not be expected to significantly adsorb to sediment or to bio-concentration in aquatic organisms.

Releases to soil will evaporate rapidly from near-surface soil and partially leach into groundwater where its fate is unknown.

Dichloromethane is not expected to bio-concentrate in the food chain,

#### **Dichloromethane – Environmental fate**

**Terrestrial Fate:** When spilled on land, dichloromethane is expected to evaporate from near surface soil into the atmosphere because of its high vapour pressure. Although little work has been done on its absorptivity, it is probable that it will leach through subsoil into groundwater. Degradation in groundwater is unknown. Hydrolysis in soil or groundwater is not an important process under normal environmental conditions.

**Aquatic Fate:** Dichloromethane will be primarily lost by evaporation to the atmosphere which should take several hours depending on wind and mixing conditions. When released into a river, dichloromethane levels were non-detectable 3-15 miles from the source(1-2).

Biodegradation is possible in natural waters but will probably be very slow compared with evaporation.

Little is known about adsorption or bio-concentration in aquatic organisms to sediment but these are not likely to be significant processes.

Hydrolysis is not an important process under normal environmental conditions.

**Atmospheric Fate:** Dichloromethane released into the atmosphere will degrade by reaction with hydroxyl radicals with a half life of several months (1-3). It will not be subject to direct photolysis. A small fraction of the chemical will diffuse to the stratosphere where it will rapidly degrade by photolysis and reaction with chlorine radicals (1,5).

A moderately soluble chemical such as dichloromethane will be expected to partially return to earth in rain.

### **Methanol– Environmental Impact**

Methanol will enter the environment as emissions from use on site. It naturally occurs as a plant volatile, microbial degradation product of animal wastes, and in natural fermentation of carbohydrates. When spilled on land it is apt to volatilize, biodegrade, and leach into the ground water, but no data on the rates of these processes could be found.

Its fate in ground water is unknown. When released into water it will volatilize and probably biodegrade. It would not be expected to adsorb to sediment or bio-concentrate in fish. Although no data on its biodegradation in natural waters could be found, laboratory tests suggest that it may readily biodegrade and its detection in water systems may be due in part to its extensive use in industry with possible relatively steady and large levels of discharges. When released to the atmosphere it will photodegrade in hours (polluted urban atmosphere) to an estimated range of 4 to 6 days in less polluted areas. Rainout should be significant.

Human exposure will be primarily in occupational atmospheres and consumption of products containing ethanol. Exposure will also occur from other contaminated atmospheres especially in proximity to industries and cities, and ingestion of contaminated drinking water, as well as proximity to sources of natural release.

### **Methanol– Environmental Fate**

**Terrestrial Fate:** When spilled on soil, Methanol will both evaporate and leach into the ground due to the relatively high vapour pressure and low adsorption in soil. It will biodegrade in soil, probably to acetic acid and formaldehyde. If degradation is not rapid, it will leach into groundwater.

**Aquatic Fate:** When released into water, Methanol will volatilize (estimated half life is 6 days) and biodegrade. It will not sorb to sediment or bio-concentrate in aquatic organisms. Although it readily biodegrades in laboratory tests, no data on its rate of degradation in natural waters could be found.

**Atmospheric Fate:** When released into the atmosphere, Methanol will photodegrade with a half-life ranging from hours in polluted urban atmospheres to approximately 6 days in cleaner atmospheres (based on a hydroxyl radical concentration of  $8 \times 10^6$  moles/cu cm). Due to its solubility in water, rainout may be an important process.

The main inorganic components potentially sourced from process activities are sodium hydroxide and hydrofluoric acid.

### **Sodium Hydroxide – Environmental Impact**

Sodium Hydrogen can exist as an aerosol or mist, which may dissolve in clouds, fog, rain, dew, or snow. In clouds and moist air it will travel along the air currents until it is deposited as wet acid deposition (acid rain, acid fog, etc). In waterways it readily mixes with the water.

It can exist as an aerosol or mist in the air if released to the atmosphere. It dissolves when mixed with water. Insufficient data are available to predict the short-term or long-term effects of sodium hydroxide fluoride on aquatic life, plants, birds or land animals.

Concentrated caustic solution is very corrosive and would badly burn any plants, birds or land animals exposed to it. The concentrations of caustic solutions found in close proximity to sources may adversely affect some species of plants. Small quantities of caustic will be neutralised by the natural acidic media of aquatic systems. Larger quantities may lower the pH for extended periods of time. Caustic is not expected to bioaccumulate.

#### **Sodium Hydroxide – Environmental fate**

- Sodium hydroxide released to the atmosphere breaks down readily by reacting with other chemicals.
- Sodium hydroxide separates in water to sodium cations (positively charged sodium atoms) and hydroxide anions (negatively charged oxygen and hydrogen atoms), which ultimately decrease the acidity of the water.
- If released to soil, sodium hydroxide will separate into sodium cations and hydroxide anions when it comes into contact with moisture.
- Sodium hydroxide does not accumulate in the food chain.

#### **Hydrofluoric Acid – Environmental Impact**

Hydrogen fluoride can exist as an aerosol or mist, which may dissolve in clouds, fog, rain, dew, or snow. In clouds and moist air it will travel along the air currents until it is deposited as wet acid deposition (acid rain, acid fog, etc). In waterways it readily mixes with the water.

Hydrogen fluoride can exist as an aerosol or mist in the air if released to the atmosphere. It dissolves when mixed with water. Insufficient data are available to predict the short-term or long-term effects of hydrogen fluoride on aquatic life, plants, birds or land animals. Concentrated hydrogen fluoride is very corrosive and would badly burn any plants, birds or land animals exposed to it. The concentrations of hydrogen fluoride found in close proximity to sources may adversely affect some species of plants. Small quantities of hydrogen fluoride will be neutralised by the natural alkalinity of aquatic systems. Larger quantities may lower the pH for extended periods of time. Fluorides are not expected to bioaccumulate.

#### **Hydrofluoric Acid – Environmental fate**

Hydrogen fluoride may enter the air during production, use and transportation. The gas dissolves in clouds, fog, rain or snow. This enters the environment as wet acid deposition ('acid rain'). In the environment it will react with other chemicals (ammonia, magnesium, calcium) to form salts, neutralising the acid.

#### **Combustion Fume**

Combustion fume results from the use of natural gas in the process burner systems and is made up on several components as follows; -

#### **Sulphur Dioxide and Oxides of Nitrogen**

Sulphur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO, NO<sub>2</sub> and NO<sub>3</sub>), along with other chemical compounds, are released during the combustion of natural gas, these gases react in the atmosphere with water, oxygen, and other chemicals, they form acidic compounds.

Sunlight increases the rate of most of these reactions.

The resulting substances are wet (acid rain, snow, or fog) or dry (acidic gases or particulates) and may drift far from the original source before falling to the earth. The negative effects of these acidic deposits include damage to forests, soil, and aquatic ecosystems, damage to infrastructure and human health, and reduced visibility.

### **Carbon dioxide (CO<sub>2</sub>)**

Carbon dioxide is one of the most common greenhouse gases in the atmosphere and is regulated through the natural carbon cycle, where carbon dioxide is emitted into the air and reabsorbed by vegetation and water. This cycle is upset by the emission of additional carbon dioxide from human activities.

Because natural cycles cannot absorb these additional emissions, a large portion of carbon dioxide remains in the atmosphere and increases climate change. The primary human source of carbon dioxide is the burning of fossil fuels for electricity, heat, and transportation.

### **Carbon Monoxide (CO):**

This gas is created when the carbon in natural gas is not entirely burned during combustion and can have serious impacts on human health. The majority of carbon monoxide emissions come from the use of fossil fuels in transportation.

When released into the air, carbon monoxide can exacerbate heart disease and damage the human nervous system.

Carbon monoxide also has an indirect effect on global climate change, and is a criteria pollutant.

The relative risk and hazards presented at the site are considered to be of limited consequences due to :-

- (i) The extremely low levels of VOC and inorganic compounds releases discharged to atmosphere.
- (ii) The current systems, procedures and practices operated on site, including "environmental quality resource" initiatives.
- (iii) The level of awareness of management of the implications of environment legislation and its significance.
- (iv) The commitment to future development to reduce environmental emissions, by addressing new technology and application options.
- (v) The high level of awareness of the management team to the environmental implications of legislation.

### **B3.2 IMPACT UPON SSSIs / EUROPEAN PROTECTED SITES**

Operating the process is not anticipated to have adverse effects on any SSSI, ANOB, built heritage, sensitive receptor, surface or ground water, nor be a contributor to contamination of any surrounding land.

### **B3.3 IMPACT UPON THE CONSERVATION (HABITATS REGULATIONS).**

Operating the process is not anticipated to have adverse effects on any local conservation habitat.

### **B4 ENVIRONMENTAL STATEMENTS**

There are no supporting environmental statements supporting this application however a copy of the Company's Environmental Policy is included here.

### **B5 ADDITIONAL INFORMATION**

#### **ENVIRONMENTAL POLICY**

The Company currently operates its own Environmental Policy a copy of this is included within this application.

# ENVIRONMENTAL POLICY

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## ENVIRONMENTAL POLICY

The company has established environmental policies as a means of providing a focus and direction for the company's environmental initiatives.

The Policies provide a framework for setting and reviewing objectives and targets by which the company management intend making short and long term improvements in environmental performance.

It is implemented, maintained and communicated to all employees within the company and is also available to the general public upon request.

The Policies are reviewed on a regular basis by senior management to ensure it remains appropriate for the company's current position and future plans.

# COMPANY POLICY

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The management team of Sandwell Stripping have recognised that good environmental practice is vital to the survival and posture of both company and that of customers and suppliers and combined prosperity.

In order to take full advantage of the potential this offers, the company has implemented and maintains an Environmental policy and sub policies.

Our policy statement towards the effective management of the environment is as follows:

- We will, at all times, comply with mandatory legal requirements for all activities carried out and use whatever influence we can to promote the same to all suppliers and sub-contractors performing activities on our behalf, whether on or off site.
- We intend as a primary objective to continually reduce and, wherever possible, prevent pollution resulting from the company's activities and processes.
- We will utilise the full potential of the work force by providing all necessary training and a working environment that promotes safe and clean working practices.
- We shall continually monitor our activities and processes in order to ensure efficient use of resources and to identify actual or potential sources of pollution with a view to implementing controls and necessary emergency response procedures thus minimising waste generation, environmental impact and nuisance to neighbours.
- On an annual basis, we will review the environmental performance of the company in order to:
  - i) ensure compliance with the requirements of legislation and this policy;
  - ii) identify areas for improvement, set specific objectives for the company and, wherever possible, target dates for achievement.

In addition to this policy being displayed and distributed to all our employees, copies will be made available to any organisations or individuals without prejudice who make such a request.

**Position**

**Signed**

**Date**

## COMPANY POLICY

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Sandwell Stripping recognises that we can only achieve our business objectives if the operational performance of our activities, along with the services we supply, reflect the changing environmental priorities of the societies we serve.

For the development of the business, products and services, we will be guided by overall environmental impact criteria and social values relating to those activities. We will engage in the activities listed below.

1. Establish compliance with the national legislation assigned by the relevant regulators with regard to Pollution Prevention Control and Environmental permitting of site activities.
2. Work actively with industry bodies, suppliers and customers to develop methods to conserve and protect the environment.
3. Develop processes and procedures to prevent pollution and reduce levels of harmful emissions.
4. Progressively improve levels of environmental protection and reduce the waste generated by the operations and commercial activities of the company, promoting recycling or reuse, promoting the use of energy efficient low pollution technology, and ensuring that the methods of disposal for unusable waste are safe and create no long term environmental impact.
5. Make information on environmental performance with respect to air quality available to staff and to any other responsible body having reasonable need for it.
6. Minimise the risks of environmental accidents and in conjunction with the appropriate authorities ensure an emergency response capability to deal with accidental pollution.
7. Provide the necessary training and support to staff to ensure that they are able to fulfil the commitments given in the statement of company policy.
8. Ensure that any operational location, which is relinquished, is in an environmentally acceptable state, and fully consider the impact on the environment before committing capital expenditure or entering into any new business venture.

## **ENVIRONMENTAL ORGANISATION**

Specific environmental responsibilities are already defined in the company's management activities, and are defined in the Director's function as the nominated environmental signatory.

## **WASTE MANAGEMENT AND MINIMISATION**

The site's Waste Management is directly under the control of the Directors who have responsibility for the disposal of all "special" and general wastes.

The site operates a fully documented procedure for the disposal of waste, as defined under the Control of Pollution Regulations I and II. Full documentation is maintained in accordance with Section 17 protocols and the Special Waste Regulations in accordance with Section 62 protocols and Hazardous Waste Regulations.

Ongoing site initiatives for the minimisation of these wastes include a review of plant and abatement techniques. Several schemes are undergoing feasibility studies at the time of submission.

Wastes generated from site activities are dealt with via approved and licensed Waste Contractors. Environmental auditing of the waste contractors will form part of the Company's "Cradle to Grave" monitoring initiative.

All wastes which may contain traces or residues of process materials will be stored on site in a dedicated, fenced storage compound prior to disposal via an approved contractor.

## **POLLUTION CONTROL INITIATIVES**

In accordance with pollution prevention and control initiatives as part of the precept of resource minimisation, the Company have established ongoing procedures to comply with this aspect of regulation. This includes routine environmental audit.

## **SPILLAGE AND CONTAINMENT**

Site management have implemented specific spillage and containment procedures to deal with potential incidents.

### **C1.1 APPLICATION FEE**

The application fee is as follows; -

### **C1.2 ORDER NUMBER**

**The application does not carry an order number**

### **C3.1 COMMERCIAL CONFIDENTIALITY**

For the purpose of the provisions of this application it is the intent of Sandwell Stripping Limited to request the process detail and chemical components information contained herein not to be encompassed initially by Commercial Confidentiality.

However, should more specific data or information be required to support this application, Sandwell Stripping Limited reserves the right to revoke this and reassess the Commercial Confidentiality clause proviso.

### **C3.2 PUBLIC REGISTER**

For the purpose of the provisions of this application it is the intent of Sandwell Stripping Limited to request the process detail and chemical components information contained herein not to be placed on the Public Register.

### **C4 DATA PROTECTION**

For the purpose of the provisions of this application it is the intent of Sandwell Stripping Limited to request the process detail and chemical components information contained herein data protection legislation in its disclosure.

For Sandwell Shipping



Metropolitan Borough Council

## Part B Application form

### Application for a permit

#### Local Authority Pollution Prevention and Control Pollution Prevention and Control Act, 1999 Environmental Permitting (England and Wales) Regulations 2016

#### Introduction

##### When to use this form

This environmental permitting regime is known as and referred to as Local Authority Pollution Prevention and Control ('LAPPC'). Installations permitted under this regime are known as Part 'B' installations. Use this form if you are sending an application for a 'Part B' permit to a Local Authority under the Environmental Permitting (England and Wales) Regulations 2016 ("the EP Regulations"), SI 2016 No.1154.

##### Before you start to fill in this form

You are strongly advised to read relevant parts of the Defra General Guidance Manual issued for LA-IPPC and LAPPC.

This contains a list of other documents you may need to refer to when you are preparing your application and explains some of the technical terms used. You will also need to read the relevant Process Guidance Note(s) as relevant. The EP Regulations can be obtained from The Office of Public Sector Information, or viewed on their website at:

<http://www.legislation.gov.uk/ukxi/2010/675/contents/made>

##### Which parts of the form to fill in

You should fill in as much of this form as possible. The appropriate fee must be enclosed with the application to enable it to be processed further. When complete return to:

**Sandwell MBC  
Public Health Directorate  
Pollution Control  
PO Box 2374  
Sandwell Council House  
Oldbury B69 3DE**

**Email:** [pollution\\_control@sandwell.gov.uk](mailto:pollution_control@sandwell.gov.uk)

### **Other documents you may need to submit**

There are number of other documents you will need to send us with your application. Each time a request for a document is made in the application form you will need to record a document reference number for the document or documents that you are submitting in the space provided on the form for this purpose. Please also mark the document(s) clearly with this reference number and the application reference number, if you have been given one, which will be at the top of the form overleaf. If you do not have either of these, please use the name of the installation.

### **Using continuation sheets**

In the case of the questions on the application form itself, please use a continuation sheet if you need extra space; but please indicate clearly on the form that you have done so by stating a document reference number for that continuation sheet. Please also mark the continuation sheet itself clearly with the information referred to above.

### **Copies**

If you are submitting a paper application, please send the original and 2 copies of the form and all other supporting material, to assist the Authority in conducting any necessary consultation process.

### **If you need help and advice**

We have made the application form as straightforward as possible, but please get in touch with us at the local authority address given above if you need any advice on how to set out the information we need.

### **Please get in touch with us by:**

**Email:** [pollution\\_control@sandwell.gov.uk](mailto:pollution_control@sandwell.gov.uk)

*End of Introduction*

**LAPPC application form: to be completed by the operator**

For Local Authority use		
Application reference	Officer reference	Date received

**A1 Applicant details**

**A1.1 Name of the installation**

SANDWELL STRIPPING LIMITED

**A1.2 Please give the address of the site of the installation**

UNIT 3 GUPTA INDUSTRIAL ESTATE B69 3AP  
WEST BOMNICH STREET OLDBURY WEST MIDLANDS

Postcode B69 3AP Telephone \_\_\_\_\_

The Ordnance Survey national grid reference 8 characters, for example, SJ 123 456 (can be obtained from typing postcode into one of the on-line mapping sites).

50988900

**A1.3 Existing permits:**

Please give details of any existing LAPPC or LA-IPPC authorisation for the installation, or any waste management licences or water discharge consents, including reference number(s) and type(s):

THERE ARE NO EXISTING PERMITS

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Please provide the information requested below about the "Operator", which means the person who it is proposed will have control over the installation in accordance with the permit (if granted)

Trading/business name (if different)

SANDWELL STRIPPING LIMITED

Registered Office address

AS ABOVE

Postcode:

Principal Office address (if different)

Postcode:

Company registration number

4213639

## A2.2 Holding Companies

Is the operator a subsidiary of a holding company within the meaning of section 1159 of the Companies Act 2006?

No

Yes  *name of ultimate holding company*

Registered office address

Postcode

Principal Office address (if different)

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Postcode

Company registration number: \_\_\_\_\_

**A3.1 Who can we contact about your application?**

*It will help to have someone who we can contact directly with any questions about your application. The person you name should have the authority to act on behalf of the operator - This can be an agent or consultant.*

\_\_\_\_\_

Position \_\_\_\_\_ Address UNIT 3  
GURIA INDUSTRIAL ESTATE WEST BEAMWICH  
ST OLBURY

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**B1 About the installation**

Please fill in the table below with details of all the current activities in operation at the whole installation.

In **Column 1, Box A**, please identify all activities listed in Schedule 1 to the EP Regulations that are, or are proposed, to be carried out in the stationary technical unit of the installation.

In **Column 1, Box B** please identify any directly associated activities that are, or are proposed, to be carried out on the same site which:

- \* have a technical connection with the activities in the stationary technical unit
- \* could have an effect on pollution

In **Column 2, for Boxes A and B** please quote the Chapter number, Section number, then paragraph and sub-paragraph number as shown in Part 2 of Schedule 1 to the EP Regulations [For example, *Manufacturing glass and glass fibre where the use of lead or any lead compound is involved*, would be listed as Chapter 3, Section 3.3, Part B(b)].

**B1.1 Installation table for new permit application**

COLUMN 1	COLUMN 2
<b>Box A</b> Activities in the stationary technical unit	Section in Schedule 1 to the EP Regulations
INDUSTRIAL PAINT STRIPPING	
<b>Box B</b> Directly-associated activities	Schedule 1 references (if any)

### B1.2 Why is the application being made?

- The installation is new
- A "substantial change" is proposed to the installation
- The installation is existing, but changes to the installation or to the EP Regulations means that an LAPPC Part B permit is now required.

### B.1.3 Site Maps

Please provide:-

\* A suitable map showing the location of the installation clearly defining extent of the installations in red

Doc Reference REFER TO SUPPORTING DOCUMENT 1.3

\* A suitable plan showing the layout of activities on the site, including bulk storage of materials, waste storage areas and any external emission points to atmosphere

Doc Reference REFER TO SUPPORTING DOCUMENT 1.3

**B2.1** Describe the proposed installation and activities and identify the foreseeable emissions to air from each stage of the process (this will include any foreseeable emissions during start up, shut down and any breakdown/abnormal operation)

*The use of process flow diagrams may aid to simplify the operations*

Doc Reference: REFER TO SECTION 2.1 OF SUPPORTING DOCUMENT

**B2.2** Once all foreseeable emissions have been identified in the proposed installation activities, each emission should be characterised (including odour) and quantified.

**Atmospheric emissions** should be categorised under the following

- i. point source, (e.g. chimney / vent, identified by a number and detailed on a plan)
- ii. fugitive source (e.g. from stockpiles / storage areas).

If any monitoring has been undertaken please provide the details of emission concentrations and quantify in terms of mass emissions. If no monitoring has been undertaken please state this.

*(Emission concentration = e.g. milligrams per cubic metre of air; mass emission = e.g. grams per hour, tonnes per year)*

**B2.3** For each emission identified from the installations' activities describe the current and proposed technology and other techniques for preventing or, where that is not practicable, reducing the emissions into the air. If no techniques are currently used and the emission goes directly to the environment, without abatement or treatment then this should be stated.

Doc Reference: REFER TO SECTION 2.3 OF SUPPORTING DOCUMENT

**B2.4** Describe the proposed systems to be used in the event of unintentional releases and their consequences. This must identify, assess and minimise the environmental risks and hazards, provide a risk based assessment of any likely unintentional releases, including the use of historical evidence. If no assessments have been carried out please state.

Doc Reference: REFER TO SECTION 2.4 OF SUPPORTING DOCUMENT

**B2.5** Describe the proposed measures for monitoring all identified emissions including any environmental monitoring, and the frequency, measurement methodology and evaluation procedure proposed (e.g. particulate matter emissions, odour etc). Include the details of any monitoring which has been carried out which has not been requested in any other part of this application. If no monitoring is proposed for an emission please state the reason.

Doc Reference: REFER TO SECTION 2.2 OF SUPPORTING DOCUMENT

**B2.6** Provide detailed procedures and policies of your proposed environmental management techniques, in relation to the installation activities described.

Doc Reference: REFER TO SECTIONS 2.3 AND 2.4 OF SUPPORTING DOCUMENT

## **B2 The Installation**

Please provide written information about the aspects of your installation listed below. We need this information to determine whether you will operate the installation in a way in which all the environmental requirements of the EP Regulations are met.

**B2.1** Describe the proposed installation and activities and identify the foreseeable emissions to air from each stage of the process (this will include any foreseeable emissions during start up, shut down and any breakdown/abnormal operation)

*The use of process flow diagrams may aid to simplify the operations*

Doc Reference: REFER TO SECTION 2.1 OF SUPPORTING DOCUMENT

**B2.2** Once all foreseeable emissions have been identified in the proposed installation activities, each emission should be characterised (including odour) and quantified.

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If any monitoring has been undertaken please provide the details of emission concentrations and quantify in terms of mass emissions. If no monitoring has been undertaken please state this.

*(Emission concentration = e.g. milligrams per cubic metre of air; mass emission = e.g. grams per hour, tonnes per year)*

**B2.3** For each emission identified from the installations' activities describe the current and proposed technology and other techniques for preventing or, where that is not practicable, reducing the emissions into the air. If no techniques are currently used and the emission goes directly to the environment, without abatement or treatment then this should be stated.

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**B2.4** Describe the proposed systems to be used in the event of unintentional releases and their consequences. This must identify, assess and minimise the environmental risks and hazards, provide a risk based assessment of any likely unintentional releases, including the use of historical evidence. If no assessments have been carried out please state.

Doc Reference: REFER TO SECTION 2.4 OF SUPPORTING DOCUMENT

**B2.5** Describe the proposed measures for monitoring all identified emissions including any environmental monitoring, and the frequency, measurement methodology and evaluation procedure proposed (e.g. particulate matter emissions, odour etc). Include the details of any monitoring which has been carried out which has not been requested in any other part of this application. If no monitoring is proposed for an emission please state the reason.

Doc Reference: REFER TO SECTION 2.2 OF SUPPORTING DOCUMENT

**B2.6** Provide detailed procedures and policies of your proposed environmental management techniques, in relation to the installation activities described.

Doc Reference: REFER TO SECTIONS 2.3 AND 2.4 OF SUPPORTING DOCUMENT

**B3 Impact on the Environment**

**B3.1** Provide an assessment of the potential significant local environmental effects of the foreseeable emissions (e.g. is there a history of complaints and/or is the installation in an air quality management area ?)

Doc Reference: REFER TO SECTION 3.1 OF SUPPORTING DOCUMENT

**B3.2** Are there any sites of special scientific interest (SSSIs) or European protected sites which are within either

- 2 kilometres for an installation which includes Part B combustion, incineration (but not crematoria), iron and steel, and non-ferrous metal activities, or
- 1 kilometre for Part B mineral activities and cement and lime activities, or
- ½ a kilometre for all other Part B activities 2 kilometres of the installation?

No   
Yes  *please give names of the sites*

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**B3.3** Provide an assessment of whether the installation is likely to have a significant effect on such sites and, if it is, provide an assessment of the implications of the installation for that site, for the purposes of the Conservation of Habitats and Species Regulations 2010 (see appendix 2 of Annex XVII of the General Guidance Manual).

Doc Reference: REFER TO SECTION 3.3 OF SUPPORTING DOCUMENT

**B4 Environmental Statements**

**B4.1** Has an environmental impact assessment been carried out under The Town and Country Planning (Environmental Impact Assessment) Regulations 2011, or for any other reason with respect to the installation?

No   
Yes  *Please supply a copy of the environmental impact assessment and details of any decision made*

Doc Reference: \_\_\_\_\_

**B5 Additional information**

Please supply any additional information which you would like us to take account of in considering this application.

Doc Reference REFER TO SECTION 5 OF SUPPORTING DOCUMENT

## C1 Fees and Charges

Your application cannot be processed unless the application fee is correct and has been received by the Council. **Please contact the Council to find out the current fee and how to pay**

Email: [pollution\\_control@sandwell.gov.uk](mailto:pollution_control@sandwell.gov.uk)

**C1.1** Please give any company purchase order number or other reference you wish to be used in relation to this fee.

## C2 Annual subsistence charges

If we grant you a permit, you will be required to pay an annual subsistence charge, failure to do so will result in revocation of your permit and you will not be able to operate your installation.

**C2.1** Please provide details of the address you wish invoices to be sent to and details of someone we may contact about fees and charges within your finance section.

UNIT 3 GUPTA INDUSTRIAL ESTATE  
WEST BROMWICH STREET  
OLDBURY WEST MIDLANDS

Postcode: B69 3AP \_\_\_\_\_

## C3 Commercial confidentiality

**C3.1** Is there any information in the application that you wish to justify being kept from the public register on the grounds of commercial or industrial confidentiality?

No

Yes

Please provide full justification, considering the definition of commercial confidentiality within the EP regulations.

Doc Reference \_\_\_\_\_

**C3.2** Is there any information in the application that you believe should be kept from the public register on the grounds of national security?

No

Yes

Do not write anything about this information on the form. Please provide full details on separate sheets, plus provide a copy of the application form to the Secretary of State/Welsh Ministers for a Direction on the issue of National Security.

The information you give will be used by the Local Authority to process your application. It will be placed on the relevant public register and used to monitor compliance with the permit conditions. We may also use and or disclose any of the information you give us in order to:

- consult with the public, public bodies and other organisations,
- carry out statistical analysis, research and development on environmental issues,
- provide public register information to enquirers,
- make sure you keep to the conditions of your permit and deal with any matters relating to your permit
- investigate possible breaches of environmental law and take any resulting action,
- prevent breaches of environmental law,
- offer you documents or services relating to environmental matters,
- respond to requests for information under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 (if the Data Protection Act allows)
- assess customer service satisfaction and improve our service.

We may pass on the information to agents/ representatives who we ask to do any of these things on our behalf.

It is an offence under Regulation 38 of the EP Regulations, for the purpose of obtaining a permit (for yourself or anyone else) to:

- make a false statement which you know to be false or misleading in a material particular,
- recklessly make a statement which is false or misleading in a material particular.

If you make a false statement

- we may prosecute you, and
- if you are convicted, you are liable to a fine or imprisonment (or both).



**C5 Declaration: previous offences** (delete whichever is inapplicable)

I/We certify

EITHER

No offences have been committed in the previous five years which are relevant to my/our competence to operate this installation in accordance with the EP Regulations. OR

The following offences have been committed in the previous five years which may be relevant to my/our competence to operating this installation in accordance with the Regulations:

\_\_\_\_\_  
\_\_\_\_\_

**C6 Declaration**

**C6.1 Signature of current operator(s)\***

I/We certify that the information in this application is correct. I/We apply for a permit in respect of the particulars described in this application (including supporting documentation) I/We have supplied.

Please note that each individual operator must sign the declaration themselves, even if an agent is acting on their behalf.

For the application from:

Installation name: \_\_\_\_\_

Signature \_\_\_\_\_

Name \_\_\_\_\_

Position \_\_\_\_\_

Date \_\_\_\_\_

Signature \_\_\_\_\_

Name \_\_\_\_\_

Position \_\_\_\_\_

Date \_\_\_\_\_

*\* Where more than one person is defined as the operator, all should sign. Where a company or other body corporate – an authorised person should sign and provide evidence of authority from the board of the company or body corporate.*