

# Notice of variation and consolidation with introductory note

**The Environmental Permitting (England & Wales) Regulations 2016**

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NGF Europe Limited

NGF Europe  
Lea Green Road  
St Helens  
Merseyside  
WA9 4PR

## **Variation application number**

V/NGF/24/01

## **Permit number**

STHP/09/12/24

# NGF Europe

## Permit number STHP/09/12/24

### Introductory note

#### **This introductory note does not form a part of the notice**

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 2 of the notice comprises a consolidated permit which reflects the variations being made. All the conditions of the permit have been varied and are subject to the right of appeal.

Article 21(3) of the Industrial Emissions Directive (IED) requires the Regulator to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication of updated decisions on Best Available Techniques (BAT) Conclusions. We have reviewed the permit for this installation against the revised BAT Conclusions for surface treatment using organic solvents including preservation of wood and wood products with chemicals published on 9<sup>th</sup> December 2020. Only activities covered by this BAT Reference Document have been reviewed and assessed.

This variation makes the below changes following the review under Article 21(3) of the IED and the consolidation of the Environmental Permitting Regulations that came into force on the 4 January 2017:

- Revised emission limits and monitoring requirements for emissions to air applicable from 9<sup>th</sup> December 2024 in table S3.1 (BREF Limits);
- The operator has elected to meet BAT-associated emission levels (BAT-AELs) for total emissions of VOCs;
- An update to the process following meeting the improvement condition listed in the previous permit; and
- Inclusion of improvement conditions 1-7, this requests the operator to provide a report to demonstrate:
  - a review of their Environmental Management System (EMS);
  - a management plan for the prevention and control of leaks and spillages
  - a review whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use;
  - a review of its operating techniques for the capture, recovery and treatment of VOCs;
  - a review of its operating techniques for the capture, recovery and treatment of particulate matter or dust;
  - a review of energy efficiency; and
  - a review of the avoidance, recovery and disposal of wastes.

The rest of the installation is unchanged and continues to be operated as follows:

#### **Brief description of the process**

NGF Europe operate an organic solvent overcoating process with a consumption capacity of more than 300 tonnes per year. Various cord types are processed via the Secondary coating plants, where the solvent vapour emissions are processed in Regenerative Thermal Oxidisers (RTOs). The RTOs are an air pollution control system that destroys various hazardous emissions and odours converting the emissions to CO<sub>2</sub> & H<sub>2</sub>O via the combustion process which is then released to atmosphere from the process stack.

NGF Europe designs and manufacture a specialised glass cord products used in synchronous drive applications. Carbon Fibre, Aramid and Hybrid cords are also part of the company's portfolio. They mix raw materials to produce a batch powder which is used in the production of High Tensile Strength glassfibre (HTS). The next stage of processing is the primary dip coating processes where a water-based latex coatings made in-house to coat different fibre strands such as glass, carbon, and aramid fibres is used. Water based coatings are a mixture of chemicals which are reacted during the mixing and dip coating process. The strands are then plied to form various cord types. These cords are then processed using a secondary dip process where solvent based coatings are used to further coat different fibre-based (glass, carbon, and aramid) cords. Solvent based coatings are a mixture of chemicals including solvent that are reacted during the secondary coating process.

NGF Europe produces year on year approximately 1500T of finished cord, employs 230 people and is a part of the NSG Group. The cords are despatched globally to the belt manufacturers primarily used in the automotive industry, NGF cord is also used in belts for domestic appliances as well as industrial machinery, office equipment and power tools

NGF Europe is a manufacturing business which produces a variety of waste emissions to Air, Land and Water. The emissions to air from the processes have a variety of control measures implemented to reduce their impact on air quality and meet legal obligations/limits. Other emissions to air include vapours, fumes and noise from our internal processes. Waste materials are produced at every stage of the business, these are segregated into hazardous, non-hazardous and recyclable and collected by waste providers and taken offsite for further treatment. Trade Effluent is generated during the washing of plant and equipment and discharged to the public sewer; this process is monitored for compliance with the Consent to discharge permit, the discharge is then treated at the Wastewater Treatment Works.

NGF is located in a small business park. The closest human receptors are around 200m and there are no environmental sites of importance within 2km of the facility.

NGF Europe have implemented an Environmental Management System (EMS) certified by BSI to the requirements of ISO14001:2015. The standard is integrated with our other ISO standards and is overseen by the Compliance Team who report to the Compliance & Supply Chain manager. Senior management have endorsed an Environmental policy which is made available upon request. The business is committed to reducing its environmental impact and protecting the environment. The business has implemented and maintains systems and processes for the management of our emissions with monitoring to ensure compliance with our obligations both legal and non-legal.

#### Abatement systems applied to point source emission points.

##### Secondary Coating (SC):

- Twin RTOs treating waste gas from 4 SC lines.
- Extraction from 4 mixing system treated by twin RTOs.
- Extraction from 4 bath booths treated by twin RTOs.

##### Primary Coating (PC):

- 3 Primary Coating lines (PC123) exhaust gas to atmosphere via 30m stack for odour control.
- 4 Primary Coating lines (PC4567) exhaust gas to atmosphere via 30m stack for odour control.
- Extraction system above impregnation baths exhausted to atmosphere at low level (no stack).

##### Solvent cleaning

The Secondary Coating adhesive baths and mixing systems are covered by the extraction system which is abated via RTO. During the cleaning process Xylene is flushed through the system and reused in the process.

NGF Europe (the Installation) is permitted by St Helens Council and is located in St Helens, England.

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

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application	July 2008	Application for an A2 solvent coating activity for the use of 200 or more tonnes of solvent (xylene) per annum.
Permit Issue	2008	Reference - STHP/08/12/19
Permit Review	August 2017	Reference - STHP/17/08/12
Variation	October 2017	Reference - V/NGF/17/01
Consolidated permit	October 2017	Reference- STHP/17/10/12
Permit Review	09/12/2024	Reference- STHP/09/12/24  Statutory review of permit – surface treatment using organic solvents including preservation of wood and wood products with chemicals BAT Conclusions published on 9/12/2020.  Varied and consolidated permit issued. Effective from 09/12/2024.

End of introductory note

# Notice of variation and consolidation

## The Environmental Permitting (England and Wales) Regulations 2016

St Helens Council, in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

### Permit number

**STHP/17/10/12**

### Issued to

**NGF Europe Limited** ("the operator")

of/ whose registered office is/ whose principal office is

Lea Green Road  
St Helens  
Merseyside  
WA9 4PR


company registration number 25864670her

to operate a regulated facility at

**NGF Europe**  
**Lea Green Road**  
**St Helens**  
**Merseyside**  
**WA9 4PR**

to the extent set out in the schedules.

The notice shall take effect from 09/12/2024

Name	Date
<p><b>Mike Petersen</b> Principal Environmental Health Officer</p> 	<p><b>09/12/2024</b></p>

Authorised on behalf of St Helens Council

## **Schedule 1**

All conditions have been varied by the consolidated permit as a result of a Regulator initiated variation

## **Schedule 2 – consolidated permit**

Consolidated permit issued as a separate document.

# Permit

## The Environmental Permitting (England and Wales) Regulations 2016

### Permit number

STHP/09/12/24

This is the consolidated permit referred to in the variation and consolidation notice for application STHP/09/12/24/V00X authorising,

**NGF Europe Limited** (“the operator”),

of/whose registered office is/whose principal office is

**Lea Green Road  
St Helens  
Merseyside  
WA9 4PR**

company registration number [2586467]

to operate an installation at

**NGF Europe  
Lea Green Road  
St Helens  
Merseyside  
WA9 4PR**

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

Name	Date
Emma Woodrow	09/12/2024

Authorised on behalf of the Regulator.

# Conditions

## 1 Management

### 1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
  - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

### 1.2 Energy efficiency

- 1.2.1 The operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
  - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
  - (c) take any further appropriate measures identified by a review.

### 1.3 Efficient use of raw materials

- 1.3.1 The operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
  - (b) maintain records of raw materials and water used in the activities;
  - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
  - (d) take any further appropriate measures identified by a review.

### 1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
  - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
  - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.



- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

## 2 Operations

### 2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

### 2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

### 2.3 Operating techniques

- 2.3.1 For the activities referenced in schedule 1, table S1.1 the activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Regulator.
- 2.3.2 If notified by the Regulator that the activities are giving rise to pollution, the operator shall submit to the Regulator for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Regulator.
- 2.3.3 The operator shall
- (a) identify the process areas, sections or steps that make the greatest contribution to VOC emissions and energy consumption, which have the greatest potential for improvement;
  - (b) identify and implement actions to minimise VOC emissions and energy consumption;
  - (c) review progress and update actions on an annual basis.
- 2.3.4 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.5 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 table S2.1; and  
it conforms to the description in the documentation supplied by the producer and holder.
- 2.3.6 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
  - (b) the composition of the waste;
  - (c) the handling requirements of the waste;
  - (d) the hazardous property associated with the waste, if applicable; and
  - (e) the waste code of the waste.

- 2.3.7 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

## **2.4 Improvement programme**

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by St Helens Council.
- 2.4.2 Except in the case of an improvement which consists only of a submission to St Helens Council, the operator shall notify St Helens Council within 14 days of completion of each improvement.

## **3 Emissions and monitoring**

### **3.1 Emissions to water, air or land**

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Where a substance is specified in schedule 3 table S3.2 but no limit is set for it, the concentration of such substance in emissions to water from the relevant emission point shall be no greater than the background concentration.
- 3.1.4 Total and fugitive annual emissions from the emission point(s) set out in schedule 3 tables S3.1, S3.2 of a substance listed in schedule 3 table S3.4 shall not exceed the relevant limit in table S3.4.
- 3.1.5 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.
- 3.1.6 The operator shall
- (a) maximise the availability and performance of equipment critical to the protection of the environment;
  - (b) record all periods of other than normal operation, their cause and duration and where possible their effect on emissions.

### **3.2 Emissions of substances not controlled by emission limits**

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
- (a) if notified by St Helens Council that the activities are giving rise to pollution, submit to St Helens Council for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
  - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by St Helens Council.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures

to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

### 3.3 Monitoring

- 3.3.1 The operator shall, unless otherwise agreed in writing by St Helens Council, monitor total and fugitive VOC emissions by compiling, at least on an annual basis, a solvent mass balance of the solvent inputs and outputs of the plant, as defined in Part 7(2) of Annex VII to Directive 2010/75/EU.

The solvent mass balance shall include:

- identification and documentation of solvent inputs and outputs, (e.g. emissions in waste gases, emissions from each fugitive emission source, solvent output in waste);
- substantiated quantification of each relevant solvent input and output and recording of the methodology used (e.g. measurement, calculation using emission factors, estimation based on operational parameters);
- identification of the main sources of uncertainty of the aforementioned quantification, and implementation of corrective actions to reduce the uncertainty;
- regular update of solvent input and output data.

The solvent mass balance calculation methodology shall be agreed in writing by the Regulator.

- 3.3.2 The operator shall, unless otherwise agreed in writing by St Helens Council, undertake the monitoring specified in the following tables in schedule 3 to this permit:

- (a) point source emissions specified in tables S3.1, S3.2 and S3.3;
- (b) point source emissions specified in table S3.4;
- (c) process monitoring specified in table S3.5;

- 3.3.3 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

- 3.3.4 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.3.2 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Regulator.

- 3.3.5 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by the Regulator.

### 3.4 Odour

- 3.4.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of St Helens Council, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

- 3.4.2 The operator shall:

- (a) if notified by the Regulator that the activities are giving rise to pollution outside the site due to odour, submit to the Regulator for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
- (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Regulator.

## **3.5 Noise and vibration**

- 3.5.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer at St Helens, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.5.2 The operator shall:
  - (a) if notified by the Regulator that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Regulator for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
  - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Regulator.

## **4 Information**

### **4.1 Records**

- 4.1.1 All records required to be made by this permit shall:
  - (a) be legible;
  - (b) be made as soon as reasonably practicable;
  - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
  - (d) be retained, unless otherwise agreed in writing by St Helens Council, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
    - (i) off-site environmental effects; and
    - (ii) matters which affect the condition of the land and groundwater.
- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by St Helens Council.

### **4.2 Reporting**

- 4.2.1 The operator shall send all reports and notifications required by the permit to St Helens Council using the contact details supplied in writing by St Helens Council.
- 4.2.2 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by St Helens Council, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
  - (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;

- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4 ; and
  - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.3 A report or reports on the performance of the activities over the previous year shall be submitted to St Helens Council by 31 January (or other date agreed in writing by St Helens Council) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
  - (b) the annual production/treatment data set out in schedule 4 table S4.2; and
  - (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to St Helens Council, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 The operator shall submit an annual solvent management plan in order to demonstrate compliance with the requirements of the Industrial Emissions Directive, by 31 January each year in respect of the previous year.

### 4.3 Notifications

- 4.3.1 In the event:
- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
    - (i) inform St Helens Council,
    - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
    - (iii) take the measures necessary to prevent further possible incidents or accidents;
  - (b) of a breach of any permit condition the operator must immediately—
    - (i) inform St Helens Council, and
    - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
  - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where St Helens Council has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform St Helens Council when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to St Helens Council at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 St Helens Council shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (c) any change in the operator's name or address; and
- (d) any steps taken with a view to the dissolution of the operator.

In any other case:

- (e) the death of any of the named operators (where the operator consists of more than one named individual);
  - (f) any change in the operator's name(s) or address(es); and
  - (g) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
- (a) St Helens Council shall be notified at least 14 days before making the change; and
  - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 St Helens Council shall be given at least 14 days' notice before implementation of any part of the site closure plan.
- 4.3.7 Where the operator has entered into a climate change agreement with the Government St Helens Council shall be notified within one month of:
- (a) a decision by the Secretary of State not to re-certify the agreement;
  - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
  - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

## 4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately" in which case it may be provided by telephone.

# Schedule 1 – Operations

<b>Table S1.1 activities</b>		
<b>Activity listed in Schedule 1 of the EP Regulations</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
S6.4 A(2) (a)	Surface treating substances, objects or products using organic solvents, in particular for dressing, printing, coating, degreasing, waterproofing, sizing, painting, cleaning or impregnating, in plant with a consumption capacity of more than 150kg or more per hour than 200 tonnes per year.	From receipt of raw materials to finished goods.
Section 6.7 Part B (a), (b)	(a) Unless falling within Part A(1) or Part A(2) of any section, the mixing, milling or blending of – (i) natural rubber, or (ii) synthetic organic elastomers, if carbon black is used  (b) Any activity which converts the product of an activity falling within paragraph (a) into a finished product if related to an activity falling within that paragraph.	From receipt of raw materials to finished goods.
<b>Directly Associated Activities</b>		
Storage, handling and dispatch of intermediates, finished products, waste & other materials	Storage of intermediates and finished products. Process waste segregation and storage	Waste handling and storage
Control & abatement systems for emissions to air	Abatement of releases to air (using RTO)	Emissions control plant for the on line coating processes.

<b>Table S1.2 Operating techniques</b>		
Description	Parts	Date Received
Review of Environmental Management System	In order to improve the overall environmental performance, BAT is to elaborate and implement an Environmental Management System (EMS). (BAT 1)	09/12/2025
	Overall performance of the plant, in particular concerning VOC emissions and energy consumption (BAT 2)	
BAT Reviews	Reduce water consumption and waste water generation (BAT 20). Please refer to the NGF EMS document which contains details of their ISO1 14001	09/12/2025
	Management plan for the prevention and control of leaks and spillages (BAT 3)	09/12/2025
	Reduce solvent consumption, VOC emissions and the overall environmental impact of the raw materials used (BAT 4). Prevent or reduce fugitive emissions during storage and handling of solvent-containing materials and/or hazardous materials (BAT 5).	09/12/2025
Energy Efficiency	Distribution of raw materials in order to reduce raw material consumption and VOC emissions (BAT 6)	09/12/2025
	In order to reduce raw material consumption and VOC emissions (BAT 9)	09/12/2025
	Summary of the BAT review (BAT 18)	09/12/2025
	Energy Efficiency Plan (BAT 19)	09/12/2025



<b>Table S1.3 Improvement programme requirements</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
IC1	The operator shall review their Environmental Management System (EMS) against the requirements of BAT 1 of the STS BAT Conclusions. The operator shall produce and implement an action plan to address those improvements required as a result of the review.	09/12/2025
IC2	The operator shall submit for approval a management plan for the prevention and control of leaks and spillages, which meets the requirements of BAT 3 of the STS BAT conclusions.	09/12/2025
IC3	The operator shall carry out a review whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use (as described in condition 1.3.1 (c)), taking account of BAT 4, 5 and 20 of the STS BAT conclusions.	09/12/2025
IC4	The operator shall carry out a review of its operating techniques for the capture, recovery and treatment of VOCs, against the requirements of BAT 14 to 17. The operator shall produce a report describing how the installation is BAT, in particular where techniques other than those described in BAT 14 to 17 and Tables 11, 15, 17, 19, 21, 24, 27,30, 32 and 35 are used, how these achieve an equivalent level of performance. An example would be focusing on solvent recovery and reuse of the solvent in the process.	09/12/2025
IC5	The operator shall carry out a review of its operating techniques for the capture, recovery and treatment of particulate matter or dust, against the requirements of BAT 18 of the STS BAT conclusions. The operator shall produce a report describing how the installation is BAT, in particular where techniques other than those described in BAT 18 are used, how these achieve an equivalent level of performance.	09/12/2025
IC6	The operator shall carry out a review of energy efficiency (as described in condition 1.2.1 (b)), taking account of BAT 19 and Table 3 of the STS BAT conclusions.	09/12/2025
IC7	The operator shall carry out a review of the avoidance, recovery and disposal of wastes (as described in condition 1.4.2), taking account of BAT 22 of the STS BAT conclusions.	09/12/2025

## Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification

## Schedule 3 – Emissions and monitoring

<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (including unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
S1, S2 & S3	Primary & Secondary Coating (including RTO)	Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	100 mg/Nm <sup>3</sup>	Average over the sampling period	Minimum of once per year	BS EN 14792
S1, S2 & S3	Primary & Secondary Coating (including RTO)	Carbon monoxide	100 mg/Nm <sup>3</sup>	Average over the sampling period	Minimum of once per year	BS EN 15058
S1, S2 & S3	Primary & Secondary Coating (including RTO)	TVOC	20 mg/Nm <sup>3</sup> from 09/12/2024	Daily Average	Continuous if mass emission is ≥ 10 kg C/h	BS EN 15267-3
S1, S2 & S3	Primary & Secondary Coating (including RTO)	Particulate matter (Dust)	3 mg/Nm <sup>3</sup> from 09/12/2024	Average over the sampling period	Minimum of once per year	BS EN 13284-1

Note 1: Certification to the MCERTS performance standards indicates compliance with BS EN 15267-3

Note 2: In the absence of an EN standard, the measurement includes the DMF contained in the condensed phase.

<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (incl. unit)</b>	<b>Reference Period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
W1	External site drainage to Pendlebury Brook	Total Hydrocarbon Oil	No visible oil film	24-hour flow proportional composite sample	Quarterly	Operators observations
W1	External site drainage to Pendlebury Brook	Latex binder	No visible emulsion	24-hour flow proportional composite sample	Quarterly	Operators observations

<b>Emission point ref. &amp; location</b>	<b>Parameter</b>	<b>Source</b>	<b>Limit (incl. Unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
B1	United utilities plc	Effluent from		24-hour flow proportional	Quarterly	EN ISO 10304-3 or

	Lea Green Road	binder process treatment plant		composite sample		EN ISO 23913
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Table S3.4 Annual limits for total and fugitive emissions		
Substance	Medium	Limit (including unit)
TVOC	Fugitive	10% of solvent input
TVOC	Total	20 mg/Nm <sup>3</sup>

Table S3.5 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Thermal Oxidiser 1	Combustion Temperature	Continuous	Thermacouple	With alarm if temperature drops below 750 °C
Thermal Oxidiser 2	Combustion Temperature	Continuous	Thermacouple	With alarm if temperature drops below 750 °C

## Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters as required by condition 3.3.2	S1, S2 & S3	Every 12 months	1 January
Emissions to water or sewer Parameters as required by condition 3.3.2	W1 & B1	Every 12 months	1 January

Table S4.2: Annual production/treatment	
Parameter	Units
Solvent Consumption	tonnes
Solvent Mass Balance (SMB) as required by condition 3.3.1	As required in SMB

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Specific energy consumption	Annually	Kg/year

<b>Table S4.4 Reporting forms</b>		
<b>Media/parameter</b>	<b>Reporting format</b>	<b>Date of form</b>
Air	Form air 1 or other form as agreed in writing by the Regulator	08/03/2021
Water	Form water 1 or other form as agreed in writing by the Regulator	08/03/2021
Sewer	Form sewer 1 or other form as agreed in writing by the Regulator	08/03/2021
Performance parameters	Form performance 1 or other form as agreed in writing by the Regulator	08/03/2021

<b>Table S4.4 Reporting forms</b>		
<b>Parameter</b>	<b>Reporting form</b>	<b>Form version number and date</b>
Point source emissions to air	Emissions to Air Reporting Form, or other form as agreed in writing by the Regulator	Version 1, 08/03/2021
Point source emissions to water (other than sewer)	Emissions to Water Reporting Form, or other form as agreed in writing by the Regulator	Version 1, 08/03/2021

# Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

## Part A

<b>Permit Number</b>	
Name of operator	
Location of Facility	
Time and date of the detection	

<b>(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution</b>	
<b>To be notified within 24 hours of detection</b>	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

<b>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

<b>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Measures taken, or intended to be taken, to stop the emission	

<b>Time periods for notification following detection of a breach of a limit</b>	
<b>Parameter</b>	<b>Notification period</b>

<b>(c) Notification requirements for the breach of permit conditions not related to limits</b>	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

<b>(d) Notification requirements for the detection of any significant adverse environmental effect</b>	
<b>To be notified within 24 hours of detection</b>	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

## Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	

Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

<b>Name*</b>	
<b>Post</b>	
<b>Signature</b>	
<b>Date</b>	

\* authorised to sign on behalf of the operator



## Schedule 6 – Interpretation

“abatement equipment” means that equipment dedicated to the removal of polluting substances from releases from the installation to air or water media.

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by St Helens Council under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“background concentration” means such concentration of that substance as is present in:

- for emissions to surface water, the surface water quality up-gradient of the site; or
- for emissions to sewer, the surface water quality up-gradient of the sewage treatment works discharge.

“calendar monthly mean” means the value across a calendar month of all validated hourly means.

“CEM” Continuous emission monitor

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

“emissions to land” includes emissions to groundwater.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“groundwater protection zones 1 and 2” have the meaning given in the document titled "Groundwater Protection: Policy and Practice" published by the Environment Agency in 2006.

“hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005 No.894, the Hazardous Waste (Wales) Regulations 2005 No. 1806 (W.138), the List of Wastes (England) Regulations 2005 No.895 and the List of Wastes (Wales) Regulations 2005 No. 1820 (W.148).

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“ISO” means International Standards Organisation.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“pollution” means emissions as a result of human activity which may—

- (a) be harmful to human health or the quality of the environment,
- (b) cause offence to a human sense,
- (c) result in damage to material property, or
- (d) impair or interfere with amenities and other legitimate uses of the environment.

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

“quarterly” for reporting/sampling means after/during each 3 month period, January to March; April to June; July to September and October to December and, when sampling, with at least 2 months between each sampling date.

“sealed drainage system” in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that:

- no liquids will run off the surface otherwise than via the system
- all liquids entering the system are collected in a sealed sump, except where liquids may be lawfully discharged

“SI” means site inspector.

“Organic Compound” means any compound containing at least the element carbon and one or more of hydrogen, halogens, oxygen, sulphur, phosphorus, silicon or nitrogen, with the exception of carbon oxides and inorganic carbonates and bicarbonates.

“Solvent Emissions Directive” means Directive 1999/13/EC (as amended by Directive 2004/42/EC) on the limitation of emissions of volatile organic compounds due to the use of organic solvents in certain activities and installations.

“STS BAT Conclusions” BAT Conclusions for surface treatment using organic solvents including preservation of wood and wood products with chemicals published on 9<sup>th</sup> December 2020

“Volatile Organic Compound” (VOC) means any organic compound means any organic compound as well as the fraction of creosote, having at 293.15 K, a vapour pressure of 0.01 kPa or more, or having a corresponding volatility under the particular conditions of use.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes (England) Regulations 2005, or List of Wastes (Wales) Regulations 2005, as appropriate, and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste.

“year” means calendar year ending 31 December.

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

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

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

# Schedule 7 – Site plan



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END OF PERMIT