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LONDON BOROUGH OF MERTON

Permit With Introductory Note Pollution Prevention and Control Act 1999

Installation Address

Cappagh Public Works Ltd
8 Waterside Way, Wimbledon, London, SW17 0HB

Permit Reference Number

PPC74/19/V1

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Appendix 1 - Site Plan

1 Introductory Note

This does not form a part of the Permit.

The following Permit is issued under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016 (as amended) ("the EP Regulations") to operate an installation carrying out an activity listed in Schedule 1, Part 2 of those Regulations, to the extent of the Permit.

General Statutory Requirements

Appeal against permit conditions

Anyone who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State for the Environment, Food and Rural Affairs. Appeals must be made in accordance with the requirements of Regulation 31.

Appeals should be received by the Secretary of State for the Department for Environment, Food and Rural Affairs. The address is as follows:

The Planning Inspectorate
Environmental Pollution Appeals
Room 4/19 Temple Quay House
2 The Square, Temple Quay
Bristol
BS1 6PN

Proposed change in the operation of the installation

It is a requirement of Regulation 20 of the EP Regulations that if the Operator proposes to make a change in the operation of the installation, the London Borough of Merton shall be notified within 14 days prior to making the change. If the proposed change requires any Permit conditions to be varied, an application for variation will have to be made to London Borough of Merton.

Surrender of the permit

Where an Operator intends to cease the operation of an installation (in whole or in part) the London Borough of Merton shall be informed in writing, such notification must include the information specified in Regulation 24 of the EP Regulations.

Transfer of the permit or part of the permit

Before the Permit can be wholly or partially transferred to another person, a joint application to transfer the Permit has to be made by both the existing and proposed holders, in accordance with Regulation 21 of the EP Regulations. A transfer will not be allowed unless the Regulator considers that the proposed holder will not be the person who will have control over the operation of the installation, or will not ensure compliance with the conditions of the transferred Permit. The London Borough of Merton shall be notified in writing 14 days prior to any change in the Operator's trading name, registered name or registered company address.

Enforcement and Offences

If the London Borough of Merton are of the opinion that you have contravened, or are contravening or likely to contravene a Condition of the Permit it may serve an Enforcement Notice; in accordance with Regulation 36 of the EP Regulations.

If the London Borough of Merton are of the opinion that the operation of an installation or mobile plant involves a risk or serious pollution it must, in certain circumstances, serve a Suspension Notice; in accordance with Regulation 37 of the EP Regulations

The offences detailed in Regulation 38 of the EP Regulations include failing to comply with or to contravene a Condition in a Permit, failing to comply with an enforcement or suspension notice, intentionally to make a false entry in any records to be kept under a condition of a permit.

A person guilty of an offence, upon summary conviction, could be liable (i) to the maximum penalty of a fine exceeding £50,000 and/or six months imprisonment, or (ii) upon conviction to an unlimited fine and/or two years imprisonment.

Confidentiality

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

Responsibility under workplace health and safety legislation

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

Contacting the London Borough of Merton

If you wish to contact the local authority regarding any matters related to this permit contact:

London Borough of Merton, 14th Floor Civic Centre, Morden, Surrey, SM4 5DX

Email: ehhealth@merton.gov.uk

Phone: 020 8545 3025

Fax: 020 8545 4025

End of Introductory Note

2 Permit To Operate A Part B Installation

LONDON BOROUGH OF MERTON

**The Environmental Permitting (England and Wales) Regulations 2016
(as amended)**

Permit Reference Number: PPC74/19/V1

London Borough of Merton ("the Regulator") in exercise of the powers under Regulation 10 of the The Environmental Permitting (England and Wales) Regulations 2016 (as amended) hereby permits:

Cappagh Public Works Ltd ("the Operator") whose registered office address is Cappagh House, Waterside Way, Wimbledon, London, SW17 0HB.

to operate a concrete batching activity falling within Section 3.1 Part B (b) of Schedule 1 of the The Environmental Permitting (England and Wales) Regulations 2016 subject to the conditions of this Permit at the following installation address:

8 Waterside Way, Wimbledon, London, SW17 0HB.

Signed



An Authorised Officer of the London Borough of Merton

Date

6th March 2019

3. Description of Permitted Installation

Cappagh Public Works Ltd is permitted to operate the loading, unloading and use of a cement silo at the site situated at Waterside Way, Wimbledon, London, SW17 0HB.

The installation is a 26 tonne capacity cement silo. The activities identified with foreseeable emission are:

- Bulk Cement delivery
- Cement distribution
- Maintenance of the cement silo

Bulk cement shall be delivered by a contractor. The hoses used during the delivery of cement are supplied by the contractor.

Bulk cement and other cementitious materials will be stored in the silo. The silo will be fitted with audible high-level alarms to warn of overfilling. Venting of air from tankers during delivery shall be at a rate which will avoid overpressurisation of the silo. Venting of air from the tanker at the end of a delivery shall be through the silo.

Cement is distributed from cement silo into the distribution vehicle on an unspecified number of occasions per day dependent upon workload requirements.

Transfer of cement, other than delivery to site storage, shall be by means of enclosed auger screw through a shoot that is kept to a height that reduces the dust from escaping. Charging the silo will be made means of hose couplings sealed to stop discharge.

The silo is fitted with filters to reduce the escape of dust while loading and unloading.

The location and site boundary of the installation is attached as Annex 1.

4 Conditions of the Permit

Extent of the Installation

1. The Permitted Installation shall be limited within the installation boundary as outlined in red on the site plan (LBM/EPA/074) attached as Annex 1.

Management Techniques

Operational Matters

2. The Permitted Installation shall be managed in an efficient and effective manner that facilitates the reduction and prevention of emissions to air. A structured environmental management system shall be established and implemented at the installation. This can be a published standard or a tailor made in-house management system (see explanatory notes).

3. All staff, in particular those who supervise the installation, shall be fully conversant with the requirements of the Permit. A copy of this permit shall be made available at all times for reference by all staff carrying out work subject to the requirements of the Permit.

Training

4. Staff at all levels shall receive the necessary training, supervision and instruction in their duties relating to the Permit. Training shall include:

- (a) Awareness of their responsibilities under the permit
- (b) All potential environmental effects from normal and abnormal operations
- (c) Operating instructions, in particular reverse air jet filter units and the cement silo management system
- (d) Procedures to minimising emissions during start up, shutdown and abnormal events operation silo overfilling or over-pressurisation.

A record of training shall be provided for each person who has duties relating to the permit in accordance with Condition 8.

Maintenance

5. All plant, equipment and technical means shall be used in operating the Permitted Installation shall be maintained in good operational condition.

6. Appropriate preventative maintenance shall be employed on all plant, buildings and equipment concerned with the control of emissions to air. A written maintenance schedule shall be established for the installation to include the maintenance of pressure relief valves, reverse air jet filters and high-level warning systems. Maintenance records shall be kept in accordance with Condition 8.

7. Essential spares and consumables shall be held (or available locally at short notice) for all plant and equipment concerned with the control of emissions to air. Alternatively:

- (a) A service contract for the plant, which includes a priority attendance requirement for arrestment plant failure, shall be held with a suitable contractor; or
- (b) The Company shall employ a mobile service and repair engineer carrying essential spares and consumables.

Record Keeping

8. Records shall be kept in a logbook of all visual assessments, abnormal emissions, staff training, maintenance, equipment inspections and malfunctions. Records shall include the time and date of the assessments and inspections, the result, and the name of the person undertaking the assessment or inspection. The records shall be:

- (a) Maintained in a legible and orderly fashion
- (b) Located on site
- (c) Kept by the operator for at least two years
- (d) Made available for inspection by an authorised officer of the London Borough of Merton during compliance inspections.

Emission Limits, Monitoring And Other Requirements

Visible Emissions

9. There shall be no visible emissions arising from the process beyond the site boundary.

10. A visual assessment of emissions shall be made frequently and at least once per day during operations. The time, location and results of the assessment shall be recorded in the site logbook as required by Condition 8. The abnormal emissions procedure detailed in Condition 13 shall be adhered to in the event of a visible emission.

11. A visual assessment of any particulate matter emissions shall be made during each cement delivery from the storage silo inlet and outlet. The start and finish time of the delivery and results of the visual assessment should be recorded in the site logbook as required by Condition 8. The abnormal emissions procedure detailed in Condition 13 shall be adhered to in the event of a visible emission.

Emissions from arrestment plant

12. New or replacement arrestment plant with an exhaust flow of over 110 m³/min should be designed to achieve the limit of 50 mg/m³ for particulate matter when functioning correctly.

Abnormal Emissions

13. In the case of abnormal events, malfunction or breakdown leading to visible emissions the operator shall adopt the following procedure:

- (a) Investigate and undertake remedial action immediately;
- (b) Adjust the process or activity to minimise those emissions; and
- (c) Promptly record the events and action taken in the site logbook.

The Environmental Health Manager of the London Borough of Merton shall be informed without delay if there is an emission that is likely to have an effect on the local community or in the event of the failure of key abatement plant.

Process Operations

Silo

14. Bulk cement and other cementitious material shall only be stored in a single storage silo.

15. The Operator shall maintain a cement silo management system, which continuously monitor for the correct operation of silo dust arrestment units, pressure relief devices, and high-level alarms. Staff shall receive training related to the operating procedures associated with the cement silo management in accordance with Condition 4.

16. The vents associated with the cement storage silo shall be fitted with suitably sized reverse air-jet cartridge filter units for the arrestment of particulate matter. The cleaning operation of the reverse air jet filters shall be interlocked to ensure their operation during charging of the silo. The silo shall not be filled without the arrestment plant fitted and operational.

17. The reverse air-jet cartridge filter units serving the cement silo shall be inspected at least once a month for correct operation and shall be maintained in accordance with manufacturers' instructions. Where defects occur, corrective action shall be taken as soon as practicable and no delivery to the silo shall take place until the arrestment equipment is operating correctly. A record of this inspection and any remedial action shall be made in the site logbook in accordance with Condition 8.

18. All practical measures to prevent the over-pressurisation of the silos shall be undertaken. The seating of the pressure relief valves fitted to the cement silo shall be inspected at least once a month or in the event of any adverse emissions from the cement silos. Should it appear that the valve has become unseated, the delivery shall cease and no further delivery shall take place until the valve has been re-seated. The results of the check, together with any remedial action, shall be detailed in the logbook in accordance with Condition 8.

19. The high-level indicators and alarm systems fitted to the cement silo shall be maintained in working order to prevent overfilling. A record of all alarm triggers shall be kept in the logbook in accordance with Condition 8. Alarm testing shall be included in the installation maintenance programme.

20. The unloading of cementitious material into storage silo shall be supervised at all times by a competent member of staff. In the event of the high-level alarm system associated with the storage silo being activating during unloading, the tank driver shall cease unloading immediately. Unloading shall only continue once normal operating conditions reconvene.

21. Transfer lines for pressure delivery of powders to the cement silos shall be checked for correct and secure connection prior to any discharge of materials. Tank drivers shall be made aware of this procedure and what measures to follow in the event of abnormal emissions by clearly legible signs situated next to all filling connections.

22. If visible emissions of particulate matter arise from ducting, pipe work, pressure relief valves or dust arrestment units during silo filling, the operation shall cease. The abnormal emission procedure detailed in Condition 13 shall be adopted.

23. The silo shall be installed with automatic protection systems to control the delivery of material from the tanker to the silo thereby reducing incidences of over-pressurisation.

24. The reverse air-jet cartridge filters units to be fitted to the cement storage silos shall be designed to operate to an emission standard of less than 10 mg/m³ for particulate matter. The local authority shall be informed in writing of any new or replacement silo filter unit being installed. The technical specifications of the filter unit shall be provided.

Loading areas

25. A rubber sock chute system shall be used for loading material into truck mixers. The condition of the rubber sock shall be inspected at least once a month. The results of the inspection and any remedial action required shall be recorded in the logbook required in condition 8.

26. Regular inspection and maintenance of fitted filtration equipment shall be undertaken as part of installation maintenance schedule, with a record made in the logbook required by condition 8.

Stockpiles And Aggregate Delivery

27. All deliveries of aggregates shall be supervised by the plant supervisor and carried out so as to minimise the emission of dust.

28. Aggregate shall only be delivered and contained within four storage bays. Aggregate shall not be piled higher than the external walls of the bays and shall not be forward of the bay. Deliveries shall be undertaken in a careful manner so as to ensure dust emissions are minimised.

29. Dust suppression, through water spraying, shall be available in the storage areas where dry material is located. Water sprays shall be suitably positioned to prevent the generation of airborne dust.

30. Deliveries to silo from road vehicles should only be made using tankers with an on board (truck mounted) relief valve and filtration system. Use of alternative techniques may be acceptable provided that they achieve an equivalent level of control with regard to potential for emissions to air.

31. All transfer points shall be fully enclosed to minimise the generation of airborne dust.

32. Transfer of cement, other than delivery to site storage, shall be by no means of enclosed auger screw through a shoot that is kept to a height that reduces the dust from escaping. Charging the silo will be made by means of hose couplings sealed to stop discharge.

Conveying

33. Maintenance of conveyor systems shall be included in the installation maintenance schedule.

Roadways And Transportation

34. The access roads and trafficked areas around the installation buildings shall be hard-surfaced and kept clean by vacuum or wet cleaning to ensure that dust emissions are minimised. These areas shall be dampened whenever dry weather may result in dust emissions.

35. To prevent dust being carried off site, wheel cleaning shall take place prior to vehicles leaving the site. An adequate supply of water shall be available at installation for dust suppression.

Fugitive Emissions

36. The regular cleaning of the site shall be undertaken in accordance with the maintenance programme referred to in Condition 6.

37. Dusty waste shall be stored in closed containers.

38. The clearing of spillages and general yard cleaning shall be undertaken as necessary to prevent fugitive dust emissions. This shall be undertaken by vacuum or wet handling methods. Major spillages shall be dealt with using a vacuum cleaning system, available at short notice on the same day that the spillage occurs, provided measures to minimise emissions, such as dampening, are taken immediately. Staff shall receive suitable instruction with regard to dealing with spillages in accordance with Condition 4.

End of Conditions

5 Explanatory Notes

Environmental Management System

The adoption of an environmental management system (EMS) is recommended as a key method for controlling emissions to air and thereby achieving compliance with permit conditions. This can be a simple in-house structured system that ensures LAPPC considerations are taken into account in the day-to-day running of a process or for larger companies an accredited EMS such as ISO14001 or EMAS.

A clear structure of responsibilities for all levels of staff carrying out duties related to the Permit shall be demonstrable and ideally be documented. Operators are encouraged to create a manual containing all information pertaining to environmental matters at the Installation for example, copy of the Permit, operation procedures/work instructions with regard to controlling emissions, staff training documentation, site maintenance programme, inspection records and incident reports such as abnormal emissions or complaints. The environmental management system shall be reviewed annually to ensure a continuous level of environmental improvement.

Continuous monitoring

Maintenance of monitoring equipment shall include the correct functionality of audible and visual alarms systems.

Useful References

The Environmental Permitting (England and Wales) Regulations 2016

- The Secretary of State's Guidance PG 3/1 (12) "Blending, Packing, Loading, Unloading and Use of Bulk Cement", Department of the Environment, Food and Rural Affairs.
- Secretary of State's Guidance (England and Wales): General Guidance Manual on Policy and Procedures for A2 and Part B Installations.

APPENDIX 1

SITE PLAN

LEGEND

- POINT SOURCE EMISSIONS AREA
- SITE BOUNDARY
- PERMIT BOUNDARY

