



Name of site: Holbrook, Coventry Operator/ Permit holder: Meggitt Aircraft Braking Permit ref no: BN7109IH

Officer: I Kelcey, E Plass Date: 20 08 09 Area/office: Central/ Fradley

Regime/activity: PPC/ Gasification Time in/out: 10:00 – 12:30 Event type: ☒ Routine ☐ Incident response ☐ Other

Assessment type: ☒ Site inspection ☒ Audit ☐ Check monitoring/sampling ☐ Report / data review ☐ Procedure review

Site life status: ☒ Operational ☐ Pre-operational ☐ Post-operational

Which part(s) of the permit were assessed? Energy

Compliance assessment summary

Key to completion: A = Assessed/Assessed in part (no evidence of breach)

NA = Not Applicable

C1, C2, C3, C4 = CCS cat 1–4 breach

ATL = Approach to limit

N = Not assessed

Conditions breached

a) Permitted activities	1 A					
b) Infrastructure	1 A	2 N	3 N	4 A	5 A	
c) General management	1 A	2 A	3 N	4 A		
d) Incident management	1 N	2 N				
e) Emissions	1 A	2 N	3 N	4 N	5 N	
f) Amenity	1 A	2 A	3 X	4 X	5 X	
g) Monitoring and records, maintenance and reporting	1 A	2 N	3 N	4 N		
h) Resources efficiency	1 A	2 A				

Any breach(es) listed above may constitute one or more offences under the relevant legislation. (Delete as applicable)

Pollution Prevention & Control Regulations 2000

WARNING ONLY

☒

I have noted any breaches indicated above. You should take immediate action to rectify each breach and return to compliance. You should prevent any repetition of the breaches. Breaches of conditions as indicated above can result in criminal prosecutions and/or suspension or revocation of a licence or other permit. We will now consider if further enforcement action will be taken.

☐

Review of Directly Applicable Legislation : Key:

A = Assessed, N = Not assessed, NA = Not Applicable, C1, C2, C3, C4 = CCS cat 1–4 breach.

☐ N

Report delivery method:

☐ copy left on site

☐ posted

☒ emailed

☐ faxed

Date: 20 08 09

Energy Audit- see separate report.

Please send the following documentation in support of this audit:-

Summary of major energy users

Presentation from R Gorman

CCA number and confirmation of Specific Energy Measure used in CCA calculations.

Summary of audit findings

As a result of this audit please review the compressed air and steam checklists contained in the Agency's H2 Guidance. By 31st October 2009 please confirm whether you propose to make any changes in order to continue to meet Best Available Techniques (BAT) in these areas.

Site inspection

No compliance issues were noted

Officer's signature

I Kelcey

Internal review

(initials & date)

Approved for Public Register

Recipient's name or position within company

K Young, Technical Manager CVD

Continuation sheet used

☐ Yes

☒ No

CCS record number

Notes to the recipient

This compliance report form may highlight non-compliance with your permit or directly applicable legislation as observed by the Environment Agency officer. This does not relieve the site operator of their responsibility to ensure that they comply with the permit and to prevent pollution of the environment. You are also reminded that:

- you should comply with the conditions of the permit at all times
- compliance with the permit does not remove your obligation to comply with other legislative provisions which may apply.

Understanding the Compliance Assessment Summary

a) Permitted activities	1	Specified by permit
b) Infrastructure	1	Engineering for prevention and control of emissions
	2	Closure and decommissioning
	3	Site drainage engineering (clean and foul)
	4	Containment of stored materials
	5	Plant and equipment
c) General management	1	Staff competency/training
	2	Management system and operating procedures
	3	Materials acceptance
	4	Storage, handling, labelling and segregation
d) Incident management	1	Site security
	2	Accident, emergency and incident planning
e) Emissions	1	Air
	2	Land and groundwater
	3	Surface water
	4	Sewer
	5	Waste
f) Amenity	1	Odour
	2	Noise
	3	Dust/fibres/particulates and litter
	4	Pests, birds and scavengers
	5	Deposits on road
g) Monitoring and records, maintenance and reporting	1	Monitoring of emissions and environment
	2	Records of activity, site diary/journal/events
	3	Maintenance records
	4	Reporting and notification to the Environment Agency
h) Resource efficiency	1	Efficient use of raw materials
	2	Energy efficiency

The term 'permit' for the purposes of this form includes: licences, authorisations and consents.

Understanding your non-compliance scores

Non-compliance findings are classified using our published Compliance Classification Scheme, (CCS).

This scheme categorises breaches of permit conditions based on their potential for environmental impact as shown below. If you wish to discuss further any comments made by the officer on this form, contact your local area office or for more details of the CCS scheme, see the Environment Agency's website or contact your local office.

CCS category	Description
1	A non-compliance which has a potentially major environmental effect
2	A non-compliance which has a potentially significant environmental effect
3	A non-compliance which has a potentially minor environmental effect
4	A non-compliance which has no potential environmental effect

Corrective action

We have various options to ensure that you correct actual or potential non-compliance:

- We may advise on corrective actions, verbally or in writing
- We may require you to take specific actions, by letter or by issuing a notice
- We may require you to review your procedures or management systems
- We may change some of the conditions of your permit
- We may decide to undertake a full review of your permit

Any breach of a permit is an offence, and we may take legal action:

- We may serve a warning on site or by letter. The officer will complete the site warning declaration on this form if necessary. A site warning is our minimum enforcement response, it does not preclude other enforcement action including the serving of a notice.
- For more serious offences we may issue a formal caution or prosecute. Depending on the offence, the penalties imposed by a Court can include substantial fines and even imprisonment.

We have published our Enforcement and Prosecution Policy which seeks to achieve a consistent approach to enforcement across all our regulated activities.

Environment Protection Operator and Pollution Risk Appraisal (EP OPRA)

Compliance assessment findings may affect your EP OPRA score. This score determines your charge and affects the allocation of our resources to check your compliance with the permit.

Data protection notice

The Environment Agency is responsible for regulating environmental protection, flood defence, water resources and fisheries. It has a duty to discharge its functions to protect and enhance the environment and to promote conservation and recreation. The information provided will be processed by the Environment Agency to fulfil its regulatory and monitoring functions, and to maintain the relevant public register(s). The Environment Agency may also use and/or disclose it in connection with:

- offering/providing you with its literature/services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities, emergency services) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The Environment Agency may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The Environment Agency will place a copy of this report on the public register(s). However, if you consider that any information contained in this report should not be placed on the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within **twenty working days** of receipt of the assessment form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter – What can I do if I disagree with the compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with the officer's line manager, Area Environment Manager or Area Manager. If you wish to raise your dispute further, this can be done through our official Complaints and Commendations procedure phone our general enquiry number 08708 506506 (Mon to Fri 08.00–18.00) alternatively you can send an email to enquiries@environment-agency.gov.uk. If, after following our Complaints and Commendations procedure, you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the Parliamentary Ombudsman phone their helpline on 0845 015 4033.

Energy Audit vs H2 at Meggitt Aircraft Braking Ltd

Date: 20 August 2009

Climate Change Agreement

Is an agreement in place?

Yes. Reference to be supplied.

Energy Management

Where does energy fit into the EMS?

Energy is co-ordinated into the ISO14001 EMS via the aspects and impacts register. As one of the 'top 5' issues it becomes a management programme.

Who is responsible?

No single point but this has been recognised and an Environmental Issues Committee has been instituted to ensure that all relevant managers can co-ordinate actions. This meets every two months.

How is performance managed?

Annual Management Review, site wide CCA monitoring and compliance, Executive environmental committee

Examples of targets and achievement available?

Energy consumption figures and targets widely available electronically.

How are equipment specification, utilities and operations brought together to minimise overall use?

Through the above structures.

Is there any training or CPD for post holders?

Yes. Environmental and Business Improvement Techniques training

Energy use at the installation

Types of energy used.

Electricity and natural gas only. Gas used for boilers, process and building services.

How is it measured? Sub-metering employed where?

Incoming and considerable sub metering on major users

Breakdown of sources and users eg Sankey

Summary of main users to be supplied.

What are main users and what source(s) do they use?

Main gas users are furnaces (process gas) and boilers. Furnace off gas is burnt in the boilers.

Main electrical users are induction and convection heating of furnaces.

Compared on common basis? (MWh/annum, including indirects eg grid at 2.6)

Yes.

Specific measures

Is this possible?

Yes

What is used?

Tonnage of carbon out of furnace before machining

Why (not)?

Best available measure.

What do trends show?

Continual improvement

Operations

How are shift patterns/ warm up times etc optimised to reduce energy with on/off?

Plant runs with long batch times. N/A

How is the holding of material at high/ low tempd reduced?

Furnace batch times at operational minimum. Furnace loads being maximised.

How is compressed air maintained esp leakage. See H2 for checklist.

New compressor system. Sectioned across user areas. Preventative maintenance. Checklist provided.

How is steam maintained, esp leaks and traps. See H2 for checklist.

No planned maintenance of steam lines. Checklist provided.

How are fridges serviced. See H2 for checklist.

N/A

Are heat exchange surfaces regularly defouled?

Lesni heat exchanger regularly cleaned

Are items off when not used?

Yes

How are lubrication and maintenance managed?

Most operators multiskilled and maintain own plant

Are filtration systems regularly blown down/ cleaned?

N/A

How is insulation maintained?

No formal system

How are door seals etc on hot/cold maintained?

Maintenance by supplier/ specialist contractor

Building Services

Are lighting requirements, levels and efficiencies assessed and recorded?

Ongoing survey programme

Are timers used?

No

Heat/ Cool/ Vent. Assessed for efficiency. Bench marked.

Improved sectionalisation and controls planned

Water heated at point of use.

N/A

Energy Efficiency Plan

All techniques applicable but not used are identified?

Yes

Such techniques are assessed for carbon reduction?

Yes

NON-CCA ONLY. Cost benefit analysis and forward plan in place? Show.
Compare CBA to H2 examples.

NON CCA Installation extra measures

Brief discussion on these topics, mindful that CCA is in place.

CHP has been considered but there are severe supply/ demand imbalances.

No obvious waste to energy opportunity other than furnace gas recovery already in place.

Good recovery of waste heat at boilers and Lesni

Use of low energy heating (induction) on heat treatment furnaces.

Plans to optimise cooling towers with variable drive.