

Dear Mr. Weston

**Environmental Permitting (England and Wales) Regulations 2016**

**Application reference: EPR/YP3126SE/A001**

**Operator: VECTOR AEROSPACE INTERNATIONAL LIMITED (VAIL)**

Thank you for your application received on 05/03/2024. The following is to confirm our conversation of 02/12/2024.

1. Unfortunately, the application payment you sent is incorrect. The correct application charge is £15,588. This leaves a balance of £2,066 to pay.

This is calculated as follows:

- S5.4 Part A(1)(a)(ii) = £13,984 (Charging scheme reference, 1.16.2.2).
- S2.3 Part B = £825 (50% of 1.18.2)
- Habitats assessment fee = £779 (1.19.2).

There is no separate charge from the permitting of the medium combustion plant (MCP) as this will be done through the installation charges. The MCP will not be permitted as a standalone MCP but rather as a directly associated activity (DAA) to the permitted installation.

This excludes any payments for our assessments of other management plans that might become necessary on review of your response to this request for further information.

**(a) Please pay a further £2,066.**

**(b) Please pay any outstanding charges from enhanced pre-application invoice, 332484, issued 16/02/2024, for £900 (+VAT).**

2. The application documents submitted included the operations to be carried out by both VAIL and H+S Aviation Limited (H+S) on the Gosport site. We have decided, based on review of the Environmental Permitting Regulations, our Core Guidance and RGN2 (Understanding the meaning of regulated facility) that the operations carried out by H+S and VAIL require separate permitting – VAIL (one permit incorporating S5.4 Part A and S2.3 Part B and standalone Medium Combustion Plant (MCP) activities) and H+S (one permit incorporating an S2.3 Part B activity to be determined and issued by the relevant local authority).

**Please remove all references to, and environmental impacts of, the H+S operations from application documents and resubmit these documents (and site plans) which reference only the VAIL activities and operations.**

3. The application forms applicable to the VAIL activities only must be submitted.

**(a) Please resubmit application form, A, to reflect only an application from VAIL.**

**(b) Please resubmit application form, F1, to reflect the correct payments and activities being charged.**

**(c) Please resubmit application forms, B2 and B3, to reflect the correct activities for which the application is made - changing sections such as Technical Standards, for example, in application form B3.**

**- Note requirement in B3, Appendix 1, Question 13 on MCP**

**(d) Please submit application form B6 which is required for an application involving a point source discharge to receiving waters.**

**(e) Please submit application form B2.5 which is required for medium combustion plant.**

4. Application Form B2, Question 3d requires submission of a summary of your environmental management system (EMS). You have submitted a copy of your ISO14001 certificate but not a summary of the EMS.

The scope of the EMS must reflect the activities/operations which are included in the environmental permit. It is not evident that the scope of the certified EMS, *"The maintenance, repair, overhaul and testing (including flight test) of helicopters, gas turbine engines and associated electrical and mechanical support equipment including power plant, in accordance with original equipment manufacturers or other suitably approved data. The design, manufacture and proof installation of design authority modifications for both aircraft and non-aircraft parts. Fault and damage investigation and associated design, manufacture and repair of helicopter, fixed wing, engine and non-aircraft parts. Storage of helicopters, engines and associated ground and support equipment, aircraft and non-aircraft parts and material"*.

**(a) Submit a summary of your EMS.**

**Please note that, as a guide, the summary should cover all of the points in: [Develop a management system: environmental permits](#).**

**(b) Demonstrate that the scope of the certified EMS fully covers the activities being authorised in the environmental permit – surface treatment, waste treatment and operation of medium combustion plant.**

5. As you are applying for a new bespoke permit, you must submit a Site Condition Report (SCR) which meets the requirements of our guidance (the guidance was submitted to you separately on 26/11/2024). You must ensure that you fully assess the expected condition of soil/groundwater under the site and the risks to these from storage, handling and use of raw materials, intermediates, wastes etc. which may contain potentially polluting materials (particularly relevant hazardous substances).

**Submit an updated Site Condition Report, based on only the installation boundary to be occupied by VAIL, that meets all requirements of our guidance.**

*Please note that the SCR report should:*

- 1. Identify 'Relevant Hazardous Substances (RHS)' – by consideration of the chemical and physical properties of each hazardous substance [composition, solubility, toxicity, mobility, physical state (solid, liquid or gas)] and determine whether any of these substances are capable of causing soil and/or groundwater contamination.*
- 2. Include a Stage 1- 3 assessment within the SCR (as part of the application). Further details of the Stage 1 – 3 assessment are set out within EC Commission Guidance on baseline reporting (2014/C 136/03) dated 6th May 2014. This is in accordance with Schedule 7 (paragraph 5*

*[m]) of the EPR regulations 2016 / Article 22 of IED. It is also referred to in the draft H5 guidance.*

3. *Include baseline reference data within the SCR where the outcomes from the Stage 1 – 3 assessment have concluded that RHS pose a risk to soil and / or groundwater. However, for the purposes of duly making only items 1 and 2 above are requirements but this can be advised to the customer if applicable.*

6. Application Form, B2, Question 5c, requires submission of a non-technical summary (NTS) that includes a reasonable amount of information to enable public understanding.

Section 6 in application document, “Part A Permit Application Notes for Vector Aerospace International Ltd & H+S Aviation Limited” states “The following is a non-technical summary of directly associated activities which have a technical connection with the main treatment processes identified within section 5.0”.

This is not a NTS that meets our guidance requirements.

**Please submit a Non-Technical Summary.**

Note this should include a summary of your operations and a summary of the key technical standards and control measures arising from your risk assessment. As a guide, this summary document should be no more than one to two pages in length.

7. Application Form, B3, Question 3a, requires submission of process flow diagrams where required. Although there are process descriptions and information on the contents of the vats in the various process lines, there are not process flow diagrams showing the process of surface treatment activities within solely the VAIL process.

**Please submit process flow drawings for the surface treatment lines within the VAIL process.**

8. Application Form, B3, Question 3a, requires detail on the infrastructure of the site to minimise potential for leaks/spillages and to mitigate their environmental impact should they occur.

There is insufficient information included in the application on infrastructure and bunding.

**Please submit a demonstration of how the operation of vats containing chemicals and chemical storage and handling facilities are designed to prevent leaks/spillages or mitigate their consequences.**

Please note you must include capacities of all bunds and demonstrate they meet the requirements of CIRIA C736 (Containment systems for the prevention of pollution. Secondary, tertiary and other measures for industrial and commercial premises). Where buildings are being used as tertiary containment, you must demonstrate how their capacity, construction and maintenance allows them to serve this process.

9. Application form, B3, Question 3a requires evidence of the technical standards against which the VAIL process will operate.

Because of the addition of new operations that were not included in the original application, you have not demonstrated compliance against Technical Standards (including BAT requirements) for the three processes to be permitted – S5.4A waste treatment, S2.3B surface treatment and MCP operation.

**Please submit a demonstration that VAIL operation meets all BAT standards required.**

Please note that this must include assessment and compliance against the following standards:

- The Surface Treatment of Metals and Plastics by Electrolytic and Chemical Processes (EPR 2.07).
- Process Guidance Note 4/01(13). Statutory guidance for processes and installations for the surface treatment of metals. Revised: July 2013’.

Please note that other standards may also be applicable, and you should ensure you have addressed all relevant standards in your response.

Please note that demonstration of BAT is required for MCP that are parts of Part A or Part B environmental permits, and, in those cases, BAT should be assessed against the relevant standards for the Part A or Part B process themselves and any other combustion guidance that is applicable.

**10.** Application Form, B3, Question 3a, requires assessment of resource efficiency. The use of raw materials and water, for example use of water in rinsing activities, is a particular potential environmental effect from surface treatment operations. Document, “Part A Permit Application Notes for Vector Aerospace International Ltd & H+S Aviation Limited”, includes discussion on setting targets to minimise water use which is also noted in Appendix E, “Raw Materials Inventory”.

Appendix E, and the discussion on water usage, will also reflect the water used in the H+S operation which is no longer relevant to the current environmental permit application.

- (a) Demonstrate how water use is minimised, particularly through efficient rinsing techniques.**
- (b) Demonstrate how the least harmful chemicals and metals are used in the VAIL operations.**
- (c) Demonstrate how the chosen techniques for minimisation of water usage or use of hazardous chemicals, represent BAT.**

**11.** Application Form, B3, Question 3a, requires assessment of waste recovery, recycling and disposal techniques. Hazardous wastes, potentially metal hydroxide sludges and filter cakes, are a significant proportion of the waste produced by a surface treatment process.

- (a) Confirm the waste types, waste quantities, storage/handling operations, disposal routes and minimisation techniques for wastes arising from the VAIL operations.**
- (b) Demonstrate how chosen techniques for waste recovery, recycling and disposal represent BAT.**

**12.** Application Form, B3, Question 6a, requires submission of an assessment of energy usage and energy efficiency techniques/measures.

Application document, “Part A Permit Application Notes for Vector Aerospace International Ltd & H+S Aviation Limited”, includes Section 8.4 (Energy). This section includes energy used in the H+S processes. This application must include only the VAIL operation.

**Submit an assessment of energy usage at the VAIL processes and how energy efficiency techniques are implemented in the VAIL process to minimise energy usage.**

**13.** The application documentation submitted includes Air Quality Assessment dated 17/06/2024. This assessment does not include all the potential discharges to air from all the processes that will be regulated under the proposed environmental permit (S5.4A + S2.3B + MCP).

**(a) Submit an updated air quality assessment report that includes all emissions to air from the VAIL operations and their potential impact on all relevant human health and ecological receptors.**

**Note that there are Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites, Sites of Special Scientific Interest (SSSI), Local Wildlife Sites (LWS) and Ancient Woodlands within their respective screening distances for assessment.**

**(b) Submit the air quality modelling data files that generate the data used within the air quality assessment.**

Please note that assessment should follow the methodology set out in Environment Agency guidance Air emissions risk assessment for your environmental permit - GOV.UK and Environmental permitting: air dispersion modelling reports.

**14.** The application documentation submitted includes an Environmental Risk Assessment. This is not detailed and does not include assessment of the generic risks from all the operations to be carried out at only the VAIL site.

**Submit an updated Environmental Risk Assessment for only the VAIL operation that includes consideration of the impact from all potential scenarios including:**

- **Leaks/spillages.**
- **Accidents/incidents.**
- **Noise/dust/odour.**
- **Abnormal scenarios.**
- **Flood**
- **Vandalism etc.**

Note that the ERA should be, as a minimum, submitted in accordance with Risk assessments for your environmental permit - GOV.UK.

**15.** The application documentation submitted included a Noise Assessment. It is not certain if any potential noise sources at H+S were included.

**(a) Revise and resubmit, if required, the Noise Assessment to include only VAIL noise sources.**

**Note: ensure the Noise Assessment includes - Description/list of proposed noisy activities, including their locations; details of mitigation measures; map showing sensitive receptors and background monitoring locations; BS4142 assessment**

**(b) Submit the noise modelling data files.**

**16.** The potential environmental impact of pollutants discharged into receiving waters after on-site treatment in the effluent treatment plant (S5.4 Part A activity) must be assessed and impacts

screened out as insignificant using either the Environment Agency's H1 risk assessment tool or water quality modelling, where appropriate.

Application document, "Part A Permit Application Notes for Vector Aerospace International Ltd & H+S Aviation Limited" discusses the results of previous H1 assessments carried out in 2009 but some of the factors used in that assessment were not correct, for example, in the absence of water quality data on the receiving watercourse, 50% of the relevant environmental quality standard should be used rather than assuming the background concentration of pollutants to be insignificant.

**Submit an assessment of the impact of aqueous discharges on the receiving waters using the Environment Agency's H1 risk assessment tool or water quality modelling as required.**

Note that the assessment should initially be carried out on H1 using guidance... [Surface water pollution risk assessment for your environmental permit - GOV.UK](#).

Note, in this guidance, the data that are required for the assessment and the number of analytical data sets of pollutants that are necessary for valid assessments.

Due to problems in the new Excel H1 version, it cannot be used to assess the impact of aqueous discharges. To assess these, we are asking applicants to revert to the former Access database. A copy of this database and explanatory letter are attached to this request for further information.

**17.** Effluent from H+S Aviation Limited will be accepted into the VAIL effluent treatment plant to be regulated under this current bespoke permit application. There will be requirements in the VAIL permit for receiving waste (in this case, effluent) onto the VAIL site from an external source (in this case, the separately permitted H+S Aviation Limited operation).

VAIL will be required to understand fully the composition of the effluent that it is receiving from H+S Aviation Limited and how it will be treated within the VAIL effluent treatment process.

**Submit the European Waste Catalogue (EWC) Code for the waste effluent to be accepted from H+S Aviation Limited and an assessment of its composition.**

Please submit a complete response to all the requirements listed in this letter by **17<sup>th</sup> December 2024.**

Please send your response to [\*\*john.mcclean@environment-agency.gov.uk\*\*](mailto:john.mcclean@environment-agency.gov.uk).

Yours sincerely,

John McClean  
Senior Permitting Officer.