



FUGITIVE EMISSIONS MANAGEMENT PLAN

Environmental and sustainability solutions provided to
PLATER CHEMICALS GROUP LTD

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1.0 INTRODUCTION

1.1 Site Address

Plater Chemicals Group Ltd
High Street West
Glossop
Derbyshire
SK13 8ES

1.2 Operational Location

Site Grid Reference: Easting 402439, Northing 394290

1.3 Site Description

The site is located in Glossop, North Derbyshire and supplies the R&D, manufacturing, spray drying, packaging and blending operations of the Plater Group. The site is just North of the A57 and less than 500m southeast from Dinting train station. Glossop Brook runs on the southern perimeter of the site. The site is located approximately 1km west of Glossop town centre. Directly to the east of the facility is a Tesco Extra (approximately 100m away). The site is situated in an industrial area with residential areas nearby to the southeast and north. Access to the depot is via Dinting Lane off the A57, there is also a visitor entrance turning directly off the A57 through a gap in a terraced house and over a small bridge over the Glossop Brook.

The site currently consists of; site offices, a weighbridge, laboratory, production area, loading area, and warehousing.

The manufacturing activities undertaken on site could give rise to fugitive emissions which require management to prevent production and release to the environment and local sensitive receptor. This management plan outlines the steps taken to mitigate the release of the fugitive emissions identified.

1.4 Fugitive Emissions Management Requirements

The preparation of this document has been undertaken using the guidance outlined in EA guidance documents, Develop a management system: environmental permits, and Control and monitor emissions for your environmental permit. The typical condition regarding emissions of substances not controlled by emissions limits (fugitive emissions) on a permit is as follows:

“Emissions of substances not controlled by emissions 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.”

The operator shall:

“If notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan. Implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.”

1.5 Fugitive Emissions

This Management Plan addresses the need to manage the potential for fugitive emissions from the operations that may be considered as an environmental impact and a nuisance to neighbouring businesses and operations. Fugitive releases include; dust, odour, noise, mud, litter and fugitive releases to water and ground.

Fine dusts, fumes and volatile organic compounds can potentially lead to serious health impacts and fugitive leaks to ground or water can have serious effects on water supplies and aquatic ecosystems. You need to prevent or minimise these, no matter how near or far people or other receptors may be.

Other pollutants, such as coarse dust, mud and litter may be only a localised nuisance. However, you do not have the right to cause pollution or nuisance outside your site due to your activities. Your neighbours have a right to expect that your activities will not detract from their quality of life.

They have a right to expect that their environment will be free from emissions caused by your activities either on a continuous basis or at frequent intervals.

Examples of common sources of fugitive emissions are:

- The loading and unloading of containers;
- Transferring/bulking up of material from one vessel to another;

- Conveyor systems;
- Pipework and ductwork systems (e.g. pumps, valves, flanges, catchpots, drains);
- Poor building containment and extraction;
- Potential for by-pass of abatement equipment (to air or water);
- Spillages;
- Accidental loss of containment from failed plant and equipment;
- Tanker and vessels manhole openings and other access points;
- Displaced vapour from receiving tanks;
- Cleaning or replacing of filters;
- Wastewater storage;
- Drum storage;
- Tank cleaning; and
- Tanker washing.

2.0 MANAGEMENT PLAN

The Fugitive Emissions Management Plan will identify sources and potential sources of fugitive emissions and will consider the risk to sensitive receptors. The Fugitive Emissions Management Plan has been produced with the intention to reduce fugitive emission causing activities as low as is practicably possible.

The Fugitive Emissions Management Plan contains:

- An assessment of the risks of fugitive emissions problems, from normal and abnormal situations, including worst case scenarios, for example of weather, temperature or breakdowns and accidents.
- The appropriate controls (both physical and management) needed to manage those risks.
- Suitable monitoring.
- Actions, contingencies and responsibilities when problems arise.
- Regular review of the effectiveness of fugitive emissions control measures.

2.1 References

The following documents are to be viewed in conjunction with the Fugitive Emissions Management Plan:

- Environmental Management System
- Accident Management Plan

- Climate Change Risk Assessment
- Non-Technical Summary
- BAT Assessment
- Environmental Risk Assessment

3.0 SENSITIVE RECEPTORS

3.1 Personnel on Site

Personnel/operatives working on site are the closest receptors to any fugitive emissions produced on site, however due to consistent working conditions it may be unlikely that operatives would be particularly sensitive to fugitive emissions or to changes/fluctuations in fugitive emissions. All operatives shall be made aware of the issue of fugitive emissions on site and should be fully conversant with the contents of the environmental elements of the Environmental Management System and this Fugitive Emissions Management Plan.

3.2 Neighbours

Neighbouring buildings, businesses and residential areas are likely to be the most sensitive receptors to fugitive release nuisances. Dust, fumes, noise, odour and litter will be particularly noticeable to neighbouring activities. Good relationships with neighbouring businesses are essential in order to anticipate potential problems and avoid them, where possible, before official complaints are made. Plater Chemicals Group Ltd (hereon referred to as "Plater Chemicals") shall ensure:

- That all the neighbouring sites know how to contact the site if they consider fugitive emissions to be a problem (contact details will be clearly visible on the site sign along with the Environment Agency details); and
- That any complaints are recorded and that problems, where possible, are dealt with promptly.

3.3 Sites of Special Scientific Interest

There are no Sites of Special Scientific Interest (SSSIs) within 500m of the site. The nearest one is Dark Peak SSSI located approximately 3km to the east of the site.

4.0 CONTROL MEASURES

4.1 Aerial Emissions of Dusts, Fibres and Particulates

There are a few activities on site that may create dust which could possibly drift off-site and cause an amenity nuisance. Such activities include:

- Delivery vehicle movements (vehicles may kick up dust brought onto the sealed road during dry weather).

Site staff supervising individual material handling operations shall, during the carrying out of those operations, undertake visual monitoring of aerial emissions. On detection or notification of visible aerial emissions that are likely to be transported beyond the site boundary, immediate action shall be taken to stop the material handling operations giving rise to the emission and to suppress the aerial emission from the material. The incident and the remedial action will be recorded via the site's online system.

To mitigate the potential of these risks occurring in the first instance, the operator will ensure the site is kept clean and tidy. If any risk of dust presents itself, the operator will dampen the area down. The majority of material transported to the site is delivered in sealed vehicles which also reduces the likelihood of dust generation.

4.2 Odour

Most of the liquids that are received by Plater Chemicals are delivered in sealed tankers. The liquids are then pumped into storage tanks via sealed pipes with carbon filters before being transferred to the production vessels again via sealed pipes. This means that the liquids are never directly exposed to the atmosphere, thus reducing the chances of odour being detected outside the site boundary.

Further to this, most production takes place within buildings. All doors and entrances are kept closed when not in use. The buildings therefore serve to contain any odorous air should it be released. The vents inside the tanks are passive vents which means that air is not constantly being released to the atmosphere, rather the air is only released to the atmosphere when the production process requires. Again, this reduces the likelihood of odour being detected outside the site boundary.

In the event that an odour complaint is received, Plater Chemicals will carry out an investigation including doing a sniff-test of their own at the complainant's property (please see the complaint report form in Annex A below). Should the test conclude that the complaint is valid, an investigation into the cause of the odour will be carried out and documented, along with any corrective measures.

4.3 Control of Pest Infestations

Measures shall be implemented and maintained throughout the operational life of the site to control and monitor the presence of pests on the site. On this type of site, insects are likely to be the biggest problem although rodents could also be a problem if control measures aren't upheld. There are a number of measures in place to prevent infestations occurring. The site has door control within operational areas. This means that doors are only open for the minimum amount of time required reducing the chances of insects from outside entering the production area. Operational areas also have insectocutors in them which attract flying insects to them before electrocuting them. The site also has regular cleaning schedules to prevent the build-up of materials that may attract insects. An inspection of the facility for pest infestations is carried out monthly by a third-party pest controller as part of a contract and shall be recorded in the appropriate location. The contract covers 8 routine visits and 4 specialist microbiologist visits per year. Rodents, flying insects and Stored Product Insects (SPI's) are covered in this contract.

On detection or notification of pest infestations, or evidence of such, immediate action shall be taken to secure the attendance of a professional pest control contractor, to eliminate the pest infestation. The incident and the remedial action shall be recorded.

4.4 Control of Scavenging Birds and Other Scavengers

Measures shall be implemented and maintained throughout the operational life of the site to control and monitor the presence of scavenging birds and other scavengers. This includes a weekly cleaning rota for site including the removal of litter from across the site.

On detection or notification of scavenging animals or flocks of scavenging birds, immediate action shall be taken to remove or deter them from the site. The incident and the remedial action shall be recorded.

4.5 Control of Litter

Plater Chemicals' production activities are centred around chemical manufacturing and as such the ingredients are mainly liquids which arrive on site in sealed tankers and are transferred around site via sealed pipes. There is very little litter or waste associated with this process. The packaging and bottling of finished products have the potential to create waste but this process occurs indoors and there are door control systems which limit the amount of time that doors are open. There is a daily housekeeping inspection on site which includes the removal of litter from across the site. Details of site cleaning activities are recorded. In the

event that litter does escape from the site, it shall be retrieved as soon as is practicable, and no later than one hour after the end of the working day.

Litter barriers are not currently employed on site due to operational control of litter generation. However, should in future it be deemed that barriers are required, fixed and mobile netting may be introduced around core litter generating areas of site.

4.6 Surface Water Control

The site is served by a complex drainage system which is covered in more detail in the site's drainage management plan. The outside tanks and production areas within buildings are served by an onsite effluent treatment plant. The capacity of the largest tank is 54,000 litres. Any liquids that are spilt are dealt with by spill kits where possible. Where the spillages are too big, the liquid flows into the on-site effluent treatment plant with a capacity of 200,000 litres. Following treatment, the effluent is discharged into the foul sewer. Therefore, should there be a catastrophic failure of even the largest tank, the effluent treatment plant has the capacity to contain it.

4.7 Noise and Vibration

Noise is essentially unwanted sounds or sound that is not desired by the recipient. The degree of annoyance and stress that can result from exposure to noise is very difficult to quantify, since responses may vary widely between individuals.

Vibration is the oscillation of a body about a reference point. The number of oscillations per second gives the frequency of vibration (Hz). Vibration can be felt as it is transmitted through solid structures directly to the human body.

Most production activities take place within the production buildings. As such, the buildings act as the main form of noise and vibration attenuation. Other control measures include a machinery maintenance schedule which will, amongst other things, highlight any items that are operating above usual noise levels. In these cases, the machine will be shut down at the next available opportunity and will have work carried out on it to bring the noise levels back to normal.

All production machinery is fixed to the floor and cannot move around the site thus controlling unwanted vibrations. Maintenance schedules are in place that will highlight any items that are operating above usual vibration levels. In these cases, the machine will be shut down at the

next available opportunity and will have work carried out on it to bring the vibration levels back to normal.

With these control measures in place, it is unlikely that noise and vibration from Plater Chemicals will cause nuisance or distress to neighbours or local residents.

4.8 Mud on the Road

Given the nature of the site, there is a requirement to keep it as clean as possible. There is a daily housekeeping inspection on site which includes inspecting the conditions of the roads on site. Should excess dirt be found on the roads, then this will either be cleaned up by site staff or measures will be taken to get the roads cleaned by a third party.

Plater Chemicals also have agreements in place with their suppliers that tanker vehicles will arrive on site clean. Should excess dust or mud be spotted on the vehicles then they will be turned away at the entrance gate and prevented from entering site until they have been cleaned. As such, the vehicles will be clean when they arrive on site and when they leave site.

It is therefore highly unlikely that mud, debris or waste arising from site will be deposited onto public areas outside the site. However, should any be noticed, the following remedial measures will be implemented immediately:

- The affected public areas outside the site shall be cleaned.
- The cause of the mud/debris escape investigated.

4.9 Adverse Weather Conditions

Heavy rainfall: Surface water is treated in the effluent treatment plant prior to discharge to foul sewer. The storage capacity of the effluent treatment plant is 200,000 litres.

Strong winds: Winds will not affect those activities which take place indoors. There are some tanks stored outside but these are sheltered from strong winds by either buildings or trees.

High temperatures: High temperatures are unlikely to affect fugitive releases.

Snow, Frost & Ice: Snowfall, frost and ice are unlikely to affect fugitive releases.

4.10 Accident Management

Accident management has been identified and accounted for in a separate document.

4.11 Housekeeping

Good housekeeping practises on site to minimise the potential for fugitive releases will include:

- Regular inspection of drainage system and cleaning when deemed necessary; and
- General housekeeping and inspection procedures maintained.

Housekeeping measures are detailed in the Environmental Management System.

4.12 Rainwater Control

Rainwater that falls on the site is directed to the on-site effluent treatment plant. Following treatment in this plant, the liquid is discharged into the foul sewer. The effluent treatment plant has a capacity of 200,000 litres.

4.13 Fugitive Emission to Groundwater

The site is situated on the Marsden Formation bedrock Secondary A aquifer. However, to counteract potential emissions to groundwater, the facility has a bunded operational area, with an impermeable concrete surface and sealed drainage system.

4.14 Monitoring

Plater Chemicals ensure, by the implementation of a monitoring plan, that fugitive emissions from the site are limited and where possible stopped. Through effective mitigation measures the impacts of any fugitive emissions shall be reduced. The monitoring of fugitive emissions shall include:

- Daily site walkovers;
- End of day litter checks/picks; and
- Prompt responses to any complaints.

Operatives shall continue to be fully conversant with the contents of the Permit, the Management System and Fugitive Emissions Management Plan. They will be relied upon to remain observant and to draw attention to any non-conformances, adverse operating conditions and any mitigation or management failure.

Records shall be kept of any monitoring/inspection carried out.

4.15 Monitoring Records

Plater Chemicals shall keep records of site inspections. Any adverse operating conditions, non-conformances, complaints, and mitigation/management failure resulting in an accident or non-compliance with the Permit shall be recorded in the site's online system.