

Our ref: WK/201311414  
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Mr D Renwick  
Bradleys (Stowmarket)  
49 Knightsdale Road  
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12 February 2014

Dear Mr Renwick

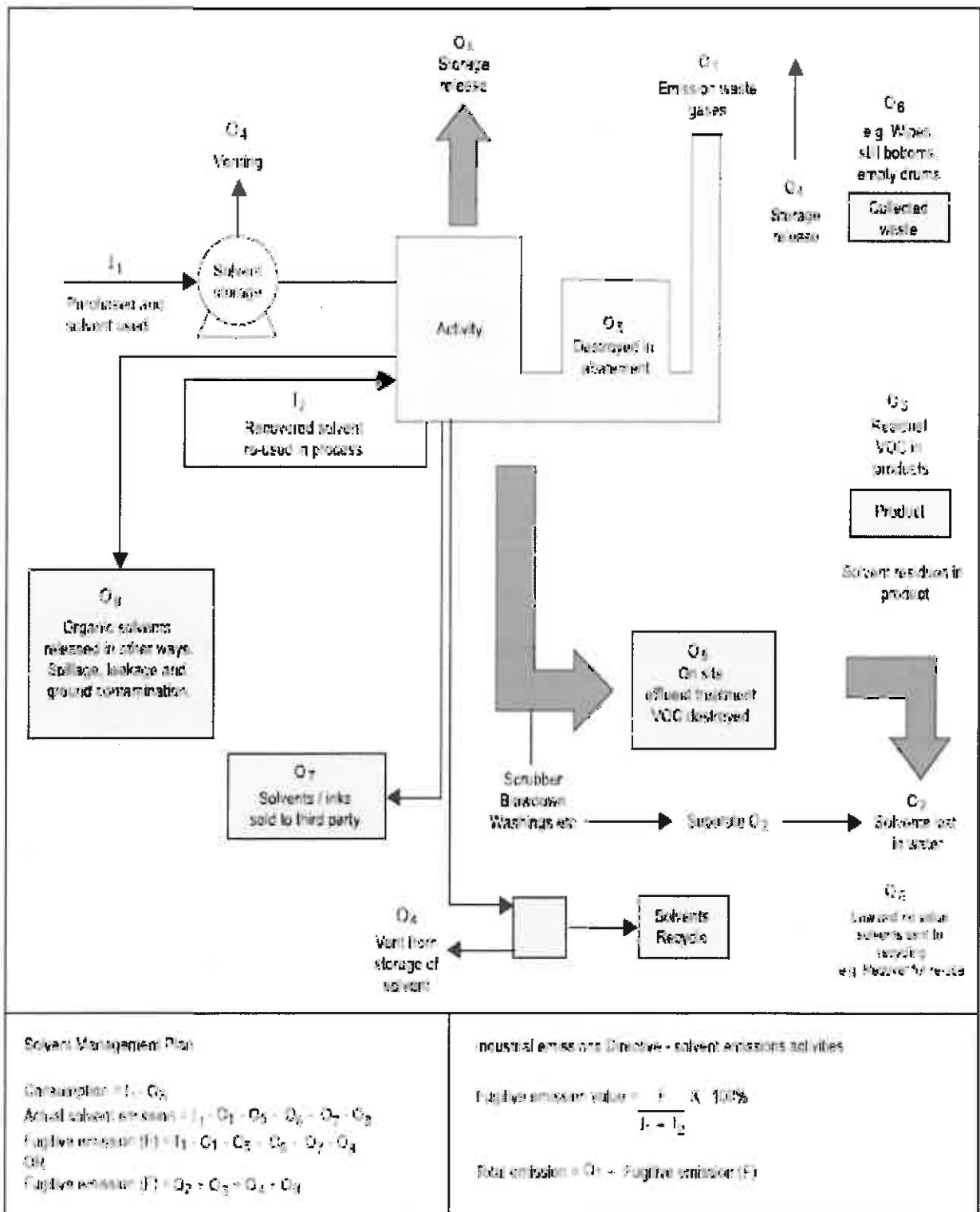
**Environmental Permitting (England and Wales) Regulations 2010, as amended.  
The Solvent Emissions Directive  
Ref: C/VPA/02/11**

I write with reference to the inspection undertaken by myself and David Rowe on Monday 10<sup>th</sup> February 2014 during which the process was audited for compliance with the permit ref: C/VPA/02/11. Under the risk based method for permitted, your installation has been assessed as MEDIUM. This will affect the frequency of inspections and the annual subsistence charge.

Condition 1 of the permit requires you to produce a yearly Solvent Management Plan (SMP) in accordance with the Solvent Emissions Directive which is used to demonstrate compliance with the volatile organic compounds (VOC's) requirements in this permit. The SMP is essentially a mass balance of inputs and outputs to/from the site. It can usefully coincide with the annual stocktaking requirements and its purpose is to serve as a method by which to demonstrate compliance with the emission limit values. Special attention must be paid to tracing, and accounting for, the delivery and consumption of solvent and solids. Items may be obtained from records (e.g. delivery notes & analytical data sheets), some may be estimates and others items may be measured.

The diagram below illustrates all the potential input and outputs that need to be considered. Once the figures have been collated for the year in question, the calculation can be applied and the fugitive emissions (F) determined. The fugitive limit is complied with if the fugitive emission value is less than or equal to 25% of solvent input.

Further guidance on the formulation of an annual SMP can be found on the Defra website or you may wish to consult an Environmental Consultant.



PGnote6/23(11)

### Degreasing and Fugitive Emissions

It was noted during the inspection that all degreasing of materials is undertaken outside. Clearly this will be a consideration when determining fugitive emission and will have an effect on your figures.

### Mixing

Condition 13 requires that all measures are taken to minimise VOC emissions during mixing. Please ensure that closed or covered vessels are used for mixing.

Waste Storage

Drums are currently being stored on a wooden pallet which provides no protection in the event of a spillage. Please ensure that this area is adequately banded.

Research Room

The newly constructed research room does not have any provision for filtered extraction and any emissions from this unit will therefore be classed as fugitive. Whilst I understand that the unit is not yet in use, consideration and mention of it must be made in the SMP so that the fugitive emissions can be accounted for. Should this area be used for storage of any paint, then it should be adequately banded in case of spillage.

**Please ensure that a Solvent Management Plan is provided to this department by 12<sup>th</sup> March 2014.**

If you have any questions, please do not hesitate to contact me on 433039.

Yours sincerely



Louise Burns  
Environmental Health Officer  
Environmental Health

