



Variation reference number: 281/24

## Schedule 2

<b>Operator</b>	<b>Acousta Foam Limited</b>
<b>Installation Address</b>	Unit D Halesfield 10 Telford TF7 4QP
<b>Permit reference</b>	126/210624
<b>Grid reference</b>	SJ71484 04135
<b>Registered office</b>	Acousta Foam Ltd 3 Hagley Court North The Waterfront Dudley West Midlands DY5 1XF
<b>Registered number</b>	1494707

Acoustafoam Ltd is hereby permitted by Telford & Wrekin Council to carry out an activity using di-isocyanate or partly polymerised di-isocyanate as defined under Schedule 1, part 2, Section 4.1, Part B(a) of The Environmental Permitting (England and Wales) Regulations 2016 ("The Regulations") and other activities as listed and described below within the installation boundary marked in red on the attached plan in Appendix 1 and in accordance with the conditions within this permit.

**Signed:**

**Name: Clair Travis**  
**Environmental Health Consultant**

**Date: 21 June 2024**

**Authorised by the Borough of Telford and Wrekin to sign in that behalf**

## Status Log

Provenance	Relevant Dates
Date Permit First Issued	07.01.13
Variation	27.11.18
Variation	28.03.19
New permitted activity and variation	31.03.20
Variation – installed new equipment	30.11.21
Variation – remove coating activity conditions	21.06.24

**Introductory Note – This Introductory note does not form part of the permit.**

## Description of the Installation

### Di-isocyanate activity

Acousta Foam Ltd manufacture polyurethane foam that can be used as interior acoustic lining and interior parts for commercial and industrial vehicles. The installation uses more than 5 tonnes per annum of di-isocyanate within the activity which is a regulated activity under Schedule 1, Part 2, Section 4.1, part B(a) of the Regulations.

Diphenyl methane di-isocyanate (MDI) and polyol are supplied drums and individual bulk containers. These are placed in the material store before being transferred to the various workstations as required. It is extremely important that the chemical species are kept entirely separate to avoid uncontrolled reactions between them.

MDI and polyol resins are transferred to the dispensing machines and then to the various moulds via separate (blue or black) delivery lines. The mixing of the polyol and di-isocyanate (MDI only) resins takes place externally to the gun head and body, essentially the two chemicals being mixed as each component exits the spray gun tip.

There are currently 10 spraying booths. These are dry type extraction booth fabricated from galvanised sheet steel. Booth performance is calculated dependent upon size and product used. The fan assembly is sized to achieve regulation airflow to HSG 258 COSHH accreditation. Stack exhaust set to achieve 15ms/sec for

monitoring VOC emission checks MCERTS. Booths are fitted with Andraee concertina filters.

At each spray booth there is one polyurethane dispensing machine and one waste bin. The machines are numbered M/C1 – M/C10 . The machines are an enclosed system and the mixing of the MDI and Polyol occurs inside. The mixed material is then gun sprayed into the mould located at the spraybooth.

The polyol and di-isocyanate react almost instantaneously within the spray stream to produce a polyurethane reaction product. Both resin components are supplied at a pre-defined rate. The two components mix and almost instantaneously begin to react to produce a polyurethane resin. The reaction is also assisted by an additional reaction with moisture in the atmosphere.

The polyol – di-isocyanate chemical reaction takes place at ambient temperature, no additional heating of curing process is necessary. A wax release agent is used to line the moulds with prior to moulding, to inhibit the foam sticking to the mould.

Each polyurethane dispensing machine is cleaned through a flushing operation (DC Flush) after every use, into a bin using an enclosed system. Each of the nine flushing waste bins is connected to extraction ducting that exits to the atmosphere at emission point 1.

The flashings around the manufactured rigid polyurethane castings and polyurethane foam mouldings are trimmed to shape by a knife into the finished product. There is no dusty emissions related to this activity.

Raw materials are stored in a separate building and are kept on bunds. Waste materials and waste drums are kept outside to the side of this building. All drums in this area are closed and are kept on bunds.

### **Raw materials used**

#### ***Foam***

Diphenyl methane di-isocyanate (MDI)  
Polyol

#### ***Release Agent***

INT200COD64 (methylene chloride)  
LR10050B (Heptane)  
HS9845-A30 (solvent)  
G08 - (non-solvent)  
HIS W 2517 (non-solvent)

#### ***Blowing Agent***

Methyl Formate

#### ***Cleaning***

DC flush cleaning agent (non-solvent)  
AS0032 cleaning fluid (non-solvent)  
MMSC cleaning agent (non-solvent)



### **Coating Activity**

Acousta Foam Ltd use adhesive coatings containing volatile organic solvents (VOCs). As of May 2024, the total annual solvent consumption has reduced and is now significantly under the threshold. The operator has surrendered this part of the permit and will re-apply for a permit should they exceed the 5 tonne annual threshold.

### **Monitoring reduction**

The Operator has demonstrated over a period of emission monitoring that the Di-Isocyanates and particulate matter are significantly under the emission limits. Therefore, the decision to remove the emission monitoring for these species has been made and emission monitoring from stacks 1-10 and 16 will not be required.

### **End of Introductory Note**

## Permit Conditions

### General

1. The best available techniques shall be used to prevent, or where that is not practicable, reduce the emissions from the installation in relation to any aspect of the activity which is not specifically regulated by any condition of this permit.
2. An appropriate person (and deputy) shall be appointed as the primary point of contact with the regulator. The regulator shall be informed in writing of the appointed person (and deputy). In the event of a different person being appointed, the regulator shall be informed without delay.
3. A copy of this permit shall be kept at the installation. All relevant staff shall be made aware of its content and shall be told where it is kept.
4. If the operator proposes to make a change in the operation of the installation, they must, at least 14 days before making the change, notify the regulator on the appropriate form. The notification must contain a description of the proposed change in operation. A 'change in operation' means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.
5. All records required to demonstrate compliance with any conditions of this Permit shall be kept in an organised manner. The records shall be kept electronically or in paper form. Records:
  - a) Must be legible and any amendment entered into a record shall be made in such a way as to leave the original clear and legible.
  - b) Records shall be kept for a period of 3 years, unless otherwise stated.
  - c) Records shall be kept on-site for a minimum of 12 months. Records kept off-site, must be made available within 7 days of any request by the regulator.
6. All documentation required to be submitted to the regulator to demonstrate compliance with relevant conditions, shall be submitted in an electronic format. Submissions shall be sent to: [environmentalprotectionteam@telford.gov.uk](mailto:environmentalprotectionteam@telford.gov.uk)

**Permitted activity**

7. Acousta Foam Ltd is permitted to operate an installation for the activities listed within Table 1 below, subject to the conditions of this permit.

<b>Activities listed in Environmental Permitting Regulations 2016</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
Diphenyl methane di-isocyanate activity using 5 tonnes or more as defined under Schedule 1, Part 2, Section 4.1, Part B,(a)	The manufacture of rigid foam using Diphenyl methane di-isocyanate	From receipt of raw materials, through to the disposal and processing of waste materials. This includes treating, handling and storage of any materials used, cleaning of plant and equipment, and the finishing and treating of products at the installation.

**Emissions and monitoring**

8. Only the plant and equipment listed in Table 2 and within appendix 2 below shall be used for the permitted activity.

<b>Plant and equipment</b>	<b>Emission points</b>
Flushing waste bins 1-9	Stack 1
Moulding spray booth 1	Stack 2
Moulding spray booth 2	Stack 3
Moulding spray booth 3	Stack 4
Moulding spray booth 4	Stack 5
Moulding spray booth 5	Stack 6
Moulding spray booth 6	Stack 7
Moulding spray booth 7	Stack 8
Moulding spray booth 8	Stack 9
Moulding spray booth 9	Stack 10
Moulding spray booth 10	Stack 16
MDI/polyol spray machine M/C 1	N/A
MDI/polyol spray machine M/C 2	N/A
MDI/polyol spray machine M/C 3	N/A
MDI/polyol spray machine M/C 4	N/A
MDI/polyol spray machine M/C 5	N/A
MDI/polyol spray machine M/C 6	N/A
MDI/polyol spray machine M/C 7	N/A
MDI/polyol spray machine M/C 8	N/A
MDI/polyol spray machine M/C 9	N/A
MDI/polyol spray machine M/C 10	N/A



9. There shall be no emissions of odour or visible emissions beyond the site boundary detailed in Appendix 1 as perceived by the Regulator.
10. In the case of abnormal emissions as perceived by the Regulator and/or by the operator, and/or malfunction or breakdown leading to abnormal emissions, the operator shall:
  - a. investigate and undertake remedial action immediately;
  - b. adjust the process or activity to minimise those emissions; and
  - c. promptly record the events and actions taken.
11. The regulator shall be informed without delay if there is an emission that is likely to have an effect on the local community.

#### **Operational controls**

12. The receipt, handling and storage of di-isocyanates and other potentially odorous or harmful substances shall be carried out in such a way that emissions are prevented, or where not practicable due to process characteristics, minimised and rendered harmless.
13. Di-isocyanates that are stored in portable, non-pressurised containers shall be stored according to the manufacturers' recommended storage temperatures and allowed to acclimatise to working temperatures before use. These containers shall not be pressurised. All such containers, whether full, partially empty, or empty, shall be kept securely lidded.
14. All IBCs and drums containing di-isocyanates or other materials containing VOCs, shall be stored in the external storage area detailed in appendix 2. The IBCs and drums shall be completely contained by bunding, which is sealed and resistant to the chemicals in storage and capable of holding 110% of the capacity of the largest storage container within the bund or 25% of the total capacity of all the containers within the bund, whichever is the greatest.
15. Where spillages of liquid occur, they shall be immediately cleaned up and contaminated material shall be held in a suitable container. Sufficient supplies of decontaminant and a suitable absorbent material shall be kept at all times.
16. The number of start-ups and shutdowns shall be kept to the minimum that is reasonably practicable.
17. Cleaning operations, cleaning techniques and cleaning substances shall be reviewed every two years to identify:
  - a. steps which could be eliminated or automated;
  - b. substances which can be substituted;
  - c. the technical and economic feasibility of changing to different non-VOC cleaning solutions.

A short summary of the conclusions of each assessment shall be made available to the regulator upon request.



18. Any solvents used for cleaning shall be kept in enclosed containers whilst not in active use.
19. Wiping cloths or brushes shall be impregnated with cleaning solvent in a controlled manner, using a dispenser or similar device.
20. All solvent contaminated clothes or brushes shall be stored in closed containers prior to disposal.
21. Empty di-isocyanate containers shall be sealed and stored in an area with an impervious surface.
22. Waste materials containing di-isocyanates shall be kept sealed and within a bunded area.
23. A high standard of housekeeping shall be maintained.

#### **Training**

24. All staff whose functions could impact on air emissions from the activity shall receive appropriate training on those functions. This shall include:
  - a. awareness of their responsibilities under the permit
  - b. steps that are necessary to minimise emissions during start up and shut down
  - c. actions to take when there are abnormal conditions, or accidents or spillages that could, if not controlled, result in emissions.
25. The operator shall maintain a statement of training requirements for each post with the above-mentioned functions and keep a record of the training received by each person. These documents shall be made available to the regulator on request.

#### **Maintenance**

26. The operator shall have the following available for inspection by the regulator:
  - a. A written maintenance programme for all pollution control equipment;  
and
  - b. A record of maintenance that has been undertaken.





**Appendix 1. Location of Installation Plan**

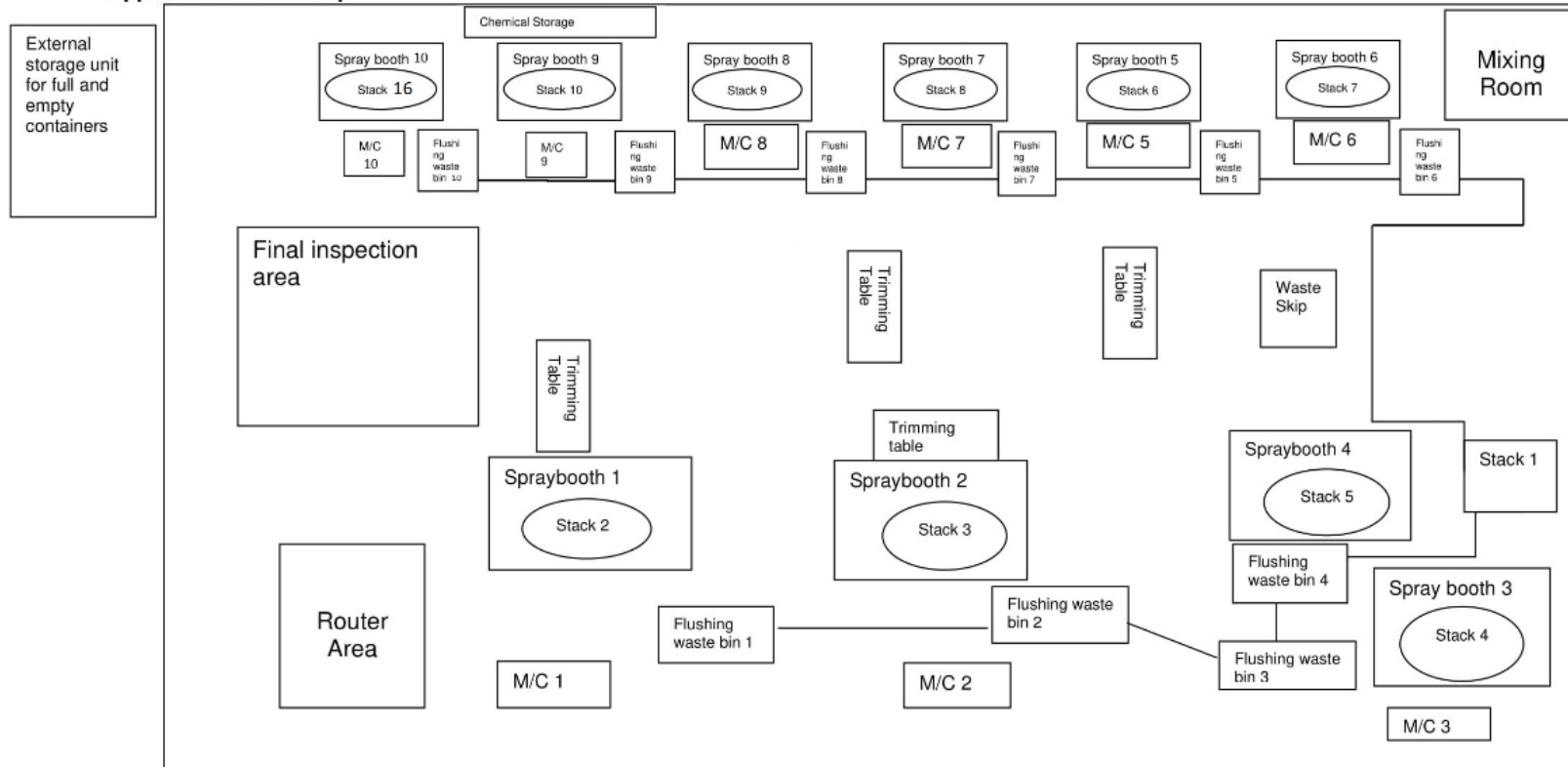


<p>Public Protection 80 Duffry House PO BOX 214 Telford TF3 4LE</p>		<p><b>Acoustafoam Telford Installation Boundary</b></p> <p><small>Represented from the Ordnance Survey mapping with the permission of the Controller of the Majesty's Stationery Office &amp; Crown Copyright. Unauthorised reproduction, in whole or in part, is prohibited and may lead to prosecution or civil proceedings through Telford &amp; Wrekin Council The Stationery Office, 2008</small></p>	<p>Scale: 1:500 0 1 2 Meters 024 8 1216</p> <p>Date: 7/8/2013 Drawn By: Chris Last</p>	
---	--	--	--	--



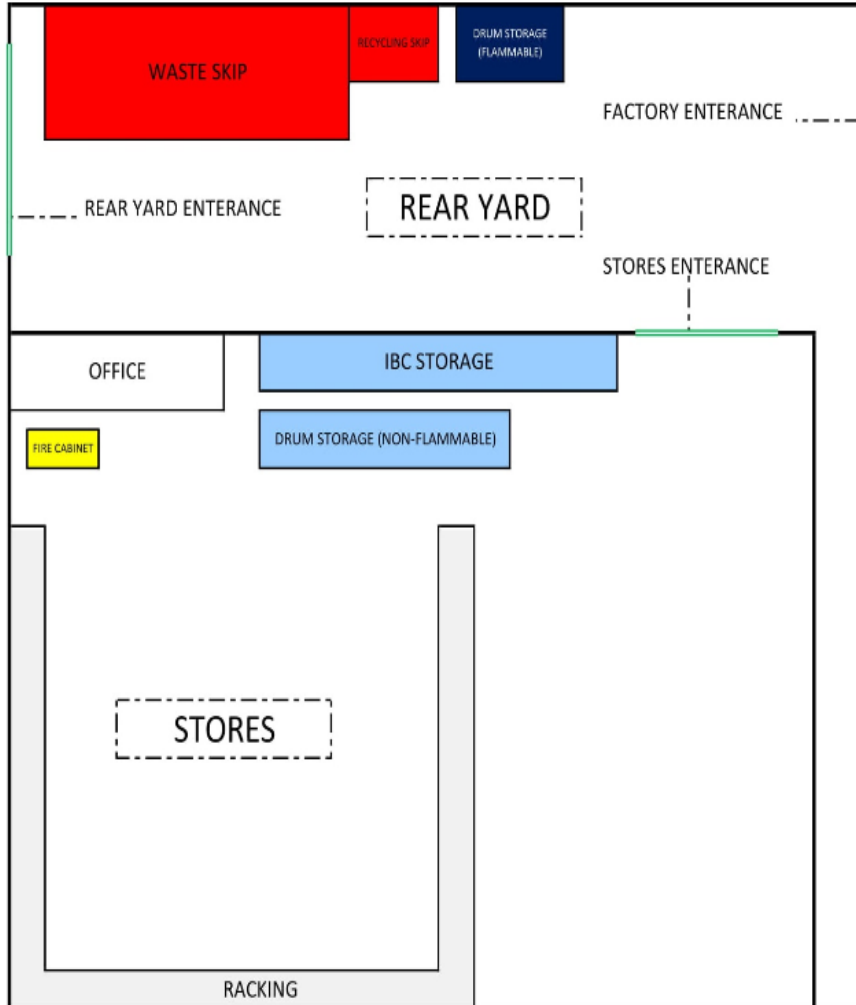
**Appendix 2. – Site Map, di-isocyanate activity**

**Appendix 2. – Site Map**





**Appendix 2 continued: Site map, External storage area and rear yard.**



**This section does not form part of the permit, but contains guidance relevant to it.**

### **Inspections**

Regular inspections will be made by officers of Telford & Wrekin Council (without prior notice), in order to check and ensure full compliance with this permit. Inspection will be carried out in accordance with a risk assessment, and/or following from any complaints or applications.

### **BAT (Best Available Techniques)**

Article 2(11) of the IPPC Directive defines “best available techniques” as follows:

*“the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing in principle the basis for emission limit values designed to prevent, and where that is not practicable, generally to reduce emissions and the impact on the environment as a whole”.*

- “techniques” shall include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned,
- “available” techniques shall mean those developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the costs and advantages, whether or not the techniques are used or produced inside the Member State in question, as long as they are reasonably accessible to the operator,
- “best” shall mean most effective in achieving a high general level of protection of the environment as a whole.

In determining the best available techniques, special consideration should be given to the items listed in Annex IV of the Directive.

### **Confidentiality**

The permit requires the operator to provide information to the regulator. The regulator will place the information onto the public register in accordance with the Regulations. If the operator considers that any information provided is commercially confidential, it may apply to the council to have such information withheld from the register as provided in the Regulations.

### **Health and Safety at Work and Other Statutory Requirements**

Compliance with this permit does not necessarily infer compliance with any other legislation.

### **Notification of Changes to the activity or Operator**

If the operator proposes to make a change in the operation of the installation, they must, at least 14 days before making the change, notify the regulator on the appropriate form. The notification must contain a description of the proposed change in operation. A ‘change in operation’ means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.

The operator may be liable to prosecution if they operate otherwise than in accordance with the conditions and plant described in this permit.

### **Transfer of the permit**

Before the permit can be wholly or partially transferred to another person, an application to transfer the permit has to be made jointly by the existing and proposed operators. A transfer will be allowed unless the regulator considers the proposed operator will not be the person who will have control over the operation of the installation or will not comply with the conditions of the transferred permit.

### **Surrender of the permit**

Where the operator intends to cease the operation of an installation (in whole or in part). In the case of Part B Permits, the operator must notify the Council on the appropriate form in accordance with Regulation 24. For A2 permits, the operator must apply for a surrender, using the appropriate form and in accordance with Regulation 25 and part 1 of Schedule 5.

### **Risk Rating**

Procedures and records shall be examined during inspections and will be referred to during the Department of Food and Rural Affairs (DEFRA) risk rating, carried out to determine the risk category: LOW, MEDIUM or HIGH which will determine the annual subsistence fee and the inspection frequency of the regulator.

### **Enforcement**

The operator will be liable to enforcement action where: -

- a) the operator fails to comply with or contravenes any permit condition;
- b) a change is made to the installation operation without prior notification of the change to the regulator;
- c) intentional false entries are made in any record required to be kept under the conditions of the permit;
- d) false or misleading statement is made.

Any enforcement action is taken in accordance with the regulator's enforcement policy.

<http://www.telford.gov.uk/NR/rdonlyres/240C3F4A-8E36-4C12-8311-E4E57A3DF8CC/26214/MicrosoftWordEnvironmentalHealthandWellbeingEnforc.pdf>

### **Annual Subsistence Charge**

An annual subsistence fee is payable in order to operate your installation. An invoice will be issued annually by the regulator which will include details of how to pay. The charges are based on the DEFRA risk rating. Details of the risk assessment can be found at

<http://www.defra.gov.uk/environment/ppc/localauth/fees-risk/risk.htm> .

You are reminded that failure to pay the subsistence fee may result on the Permit being revoked. It is an offence to operate a regulated facility without a permit and upon summary conviction liable to a maximum fine of £50,000 and/or imprisonment.

### **Appeal against Regulatory Action**

The operator can appeal against regulatory action by the regulator to the Secretary of State for Environment, Food & Rural Affairs. Appeals must be made in accordance with Regulation 31

and sent to the Secretary of State for Environment Food and Rural Affairs. The appeal for can be found at:

[http://www.planning-inspectorate.gov.uk/pins/environment/environment/environmental\\_appeals/environmental\\_permitting\\_appeal\\_form.pdf](http://www.planning-inspectorate.gov.uk/pins/environment/environment/environmental_appeals/environmental_permitting_appeal_form.pdf)

Guidance on the appeal procedure can be found at

[http://www.planning-inspectorate.gov.uk/pins/environment/environment/environmental\\_appeals/environmental\\_permitting\\_guidance\\_notes.pdf](http://www.planning-inspectorate.gov.uk/pins/environment/environment/environmental_appeals/environmental_permitting_guidance_notes.pdf)

There are time limits for making an appeal as follows:

- a) in relation to an appeal against a revocation notice, before the notice takes effect;
- b) in relation to the withdrawal of a duly-made application under paragraph 4(2) of Schedule 5, not later than 15 working days from the date of the notice served under that paragraph;
- c) in relation to a variation notification, a suspension notice, an enforcement notice or a landfill closure notice, not later than 2 months from the date of the notification or notice;
- d) in any other case not later than 6 months from the date of the decision or deemed decision.

Please note:

**An appeal will not suspend the effect of the conditions appealed against;** the conditions must still be complied with.

In determining an appeal against one or more conditions, the Act allows the Secretary of State in addition to quash any of the other conditions not subject to the appeal and to direct the local authority either to vary any of these other conditions or to add new conditions.

### **Contact Numbers for the Regulator**

The Regulator is the Public Protection Team of Telford & Wrekin Council. They can be contacted on 01925 381 818. You may also contact them by email at any time.

[environmentalprotectionteam@telford.gov.uk](mailto:environmentalprotectionteam@telford.gov.uk)

### **Correspondence Address**

All correspondence to Telford & Wrekin Council relating to this information shall be addressed to: Public Protection, Telford and Wrekin Council, Addenbrooke House, Telford, TF3 4NT.