

Permit Reference Number: HP3131KU

Operator: SPTS Technologies Ltd

Installation: SPTS Technologies Ltd

Form Number: L1

Reporting of Compliance with Low Impact Installation criteria for 2019



Criteria		Description	Demonstration of Compliance
Management techniques:	All of the criteria described below must be met without having to rely on significant management effort. In other words, the installation intrinsically must have only a low environmental impact, including under start up, shut down, or abnormal operating conditions.		<i>The installation uses only small amounts of any substance for the demonstration and development of processes. There are robust procedures in place for their use by well trained staff. The substances are well protected and secure with comprehensive automated alarms and shutoff procedures. Planned preventative maintenance schedules are in place for equipment and plant.</i>
Aqueous Waste:	The installation must not release more than 50 m ³ per day of water from process activities conducted at the installation giving rise to effluent. No account need be taken of the volume of water exported from the installation as product. Characterise and quantify any aqueous effluents released from the installation on a daily basis and provide justification that the installation releases no more than 50 m ³ per day of water from process activities.		<i>Domestic releases (toilets and kitchens) to sewerage drains are small. Cooling towers (for heat removal) discharge max of 1.5m³ per day. Systems relating to our process are on a recycled loop but could discharge up to 3m³ per day, (worst case). All of this equates to a site discharge of typically less than 5m³ per day.</i>
Techniques to prevent and reduce waste arising and emissions:	Abatement systems/releases to air: The installation must comply with the criteria in this guidance without having to rely on active abatement for releases to the environment outside of any buildings. Releases must not be dependent on continuing or correct operation of equipment, where failure of active pollution prevention systems could result in an unacceptable external release. For example, if the installation depends on active abatement in the form of scrubbers, filters or electrostatic precipitators to achieve the releases to the environment set out in this guidance, it is unlikely that it can be treated as having only a low potential for impact. However, abatement systems installed solely for the protection of workers (where abatement is not to attenuate external environmental releases) need not be included in this assessment.		<i>The design of the installation will not allow for any significant releases irrespective of equipment operation. Control systems are in use to protect both the environment and the employees. However, should there be a failure in the control systems this will automatically shutdown all process operations preventing any escape to the environment. Materials are used for demonstration and R&D purposes only and therefore small quantities used.</i>

Groundwater Regulations:	There must be no planned or fugitive emission from the permitted installation into the ground, or any soakaway. This does not preclude the discharge of clean rain water run-off into soakaways. Pet cemeteries may be exempt from this criterion provided certain specified conditions are met: - the landfill is not within a Groundwater Source Protection Zone 1 or 2; - there is a minimum of one metre unsaturated zone between the bottom of the buried carcass or cremated remains and the groundwater table; - there is a minimum of one metre of soil between the carcass and the surface; and - burial density shall not exceed 20 kg of carcass or cremated remains per m²	<i>There are no planned or fugitive emissions to ground.</i>
Waste Production:	The installation must not give rise to more than one tonne of Directive waste or 10 kg of hazardous waste per day, averaged over a year, with not more than 20 tonnes of Directive waste or 200 kg of hazardous waste being released in any one day. For the purpose of this application, no information is required on the proposed recovery and disposal of waste streams arising from the installation.	<i>The installation only gives rise to very small amounts of hazardous waste such that the limits referred to should not be reached or exceeded. Waste management system records all quantities and types of waste to continually monitor this.</i>
Energy Consumption:	The installation must not consume energy at a rate greater than 3 MW or, if the installation uses a combined heat and power installation to supply any internal process heat, 10 MW. These limits apply to the sum of energy imported as electricity and produced on site through the combustion of fuels.	<i>The installation does not consume energy at a rate greater than 3 MW or combined heat and power installation of 10 MW.</i>
Accident Prevention:	You must have in place satisfactory containment measures to prevent fugitive emissions to surface water, sewer or land and ensure that these are adequately maintained at all times. This requirement applies to all substances present on site and in any quantity.	<i>Very small quantities of substances are used at the installation. The installation has safe storage for substances, bunding and spill kits are in place. Furthermore oil interceptors at the installation are regularly checked to ensure their effectiveness. Employees are experienced and well trained in process procedures. Preventative maintenance schedules are in place throughout the whole site as well as safety alarm systems which are tested regularly.</i>
Noise:	There must be only a low potential for causing offence due to noise. An installation will not be considered as a low impact installation if it may give rise to noise noticeable outside the installation boundary. This requires the exercise of judgement, taking account of any history of	<i>There are no activities or processes that give rise to noise that would be noticeable outside of the installation boundary. There have never been comments or complaints from</i>

	noise complaint arising from the installation and consideration of the likely offsite noise levels and proximity of sensitive receptors. Describe the main sources of noise from the installation, the nearest noise sensitive locations and any relevant noise measurement surveys which have been undertaken; and the proposed techniques and measures for the control of noise. Provide justification that there is only a low potential for offence due to noise.	neighbours or interested parties.
Emissions of polluting substances:	Justify that there will be no likelihood of a release to the environment of any particular substance from the whole installation at a rate greater than that determined as insignificant as set out in our guidance note 'How to comply' and 'H1 Environmental Assessment'. Describe the nature, quantities and sources of foreseeable emissions from the installation.	Due to the small quantities of substances used and the process controls in place, it is unlikely that significant releases of any substance could take place.
Odour:	There must be only a low potential for giving offence due to odour. An installation will not be considered as a low impact installation if it may give rise to an offensive smell noticeable outside the installation boundary. This requires the exercise of judgement, taking account of any history of odour complaint from the installation and whether this class of activity is known by experience to give rise to smells. A significant possibility or actual history of excursions or fugitive emissions, for example from stored materials, would suggest that the installation could not be treated as having a low impact. Provide details of potential sources of odour from the installation, for example from stored materials, and justify that there is only a low potential for offence due to odour.	Chlorine and ammonia are used for process purposes within the installation however the small quantities stored/used could not give rise to any offensive odours. Internal control detection and monitoring systems would also alert (and isolate the gas) in the event of any issue thus preventing any discharge. This is done at levels below where any odour concerns may exist.

Compliance history	If any of the following enforcement actions have taken place at the same installation under the same management (and where appropriate, have not been overturned on appeal), then it will not normally be considered further as a low impact installation: • prosecution;* • formal caution;* • suspension notice;* • enforcement notice relating to an actual or potential environment incident.* * (All under EPR or the equivalent under previous environmental regimes)	No enforcement actions have ever been issued.
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“Environmental Assessment and Appraisal of BAT”

Signed  Date 31 JAN 19
 (authorised to sign as representative of the Operator)