

THE ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2016
REGULATION 20

NOTICE OF VARIATION OF PERMIT

To **Ramsden and Whale Limited**
Harrold Street
Great Bridge
Tipton
West Midlands
DY4 0JF

Sandwell Metropolitan Borough Council (hereafter known as "The Council") in exercise of the powers conferred on it by Regulation 20 of the Environmental Permitting (England & Wales) Regulations 2016¹ ("the 2016 Regulations") hereby gives you notice as follows-

The Council has decided to vary conditions of Permit Reference Number: PPC91978 dated 15 July 2005 granted under regulation 9(1) of the Pollution Prevention and Control (England and Wales) Regulations 2000, in respect of the operation of the regulated facility at:

Harrold Street
Great Bridge
Tipton
West Midlands
DY4 0JF

The variation of the conditions of the permit and the date on which they are to take effect are specified in the Schedule 1 to this Notice.

A consolidated permit, as varied by this Variation Notice (ref: PPC91978 – V3) is set out in Schedule 2.

Signed on behalf of Sandwell Metropolitan Borough Council

DATED: 22 July 2024

Signed 

Liann Brookes-Smith
Interim Director of Public Health
An Authorised Officer of the Council

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¹ S.I. 2016 No. 1154 to which there are amendments relevant to this variation notice.

Schedule 1

The requirements of the variations shall come into effect on the date indicated or if no date is indicated shall take effect immediately.

ALL REFERENCES TO THE PERMIT SHALL REFER TO PERMIT REFERENCE NUMBER PPC91978

VARIATIONS

Variation to the Conditions of the Permit	Date on which the variation is to take place
All existing conditions of the Permit shall be deleted and replaced with new conditions as set out in the Consolidated Permit attached to this Notice. PPC91978-V3	With Immediate effect

Guidance for operators receiving a Variation Notice

(This guidance does not form part of the Variation Notice, but it is for the guidance of those served with the notice.) Further guidance can be found in the PPC General Guidance Manual at:

<http://www.defra.gov.uk/industrial-emissions/las-regulations/guidance/>

Dealing with a Variation Notice

This notice varies the terms of the permit specified in the Notice by amending or deleting certain existing conditions and/or adding new conditions. The Schedules attached to the notice explain which conditions have been amended, added or deleted and the dates on which these have effect.

The Council may have included a 'consolidated permit', which takes into account these and previous variations. Where a consolidated permit is not included this variation notice must be read in conjunction with your permit document.

Offences

Failure to comply with a Variation Notice is an offence under regulation 38(2) of the 2016 Regulations. A person guilty of an offence under this regulation could be liable to (i) a fine of up to £50,000 or imprisonment for a term not exceeding 6 months or both; or (ii) to an unlimited fine or imprisonment for a term not exceeding 5 years or both, depending on whether the matter is dealt with in the Magistrates or Crown Court.

Appeals

Under regulation 31 and Schedule 6 of the 2010 Regulations operators have the right of appeal against the conditions attached to their permit by a variation notice. The right to appeal does not apply in circumstances where the notice implements a direction of the Secretary of State/Welsh Ministers given under regulations 61 or 62 or a direction or when determining an appeal.

Appeals against a Variation Notice do not have the effect of suspending the operation of the Notice. Appeals do not have the effect of suspending permit conditions, or any of the mentioned notices.

Notice of appeal against a Variation Notice must be given within **two months** of the date of the variation notification, which is the subject matter or the appeal.

The Secretary of State/Welsh Ministers may in a particular case allow notice of appeal to be given after the expiry of this period, but would only do so in the most compelling circumstances.

How to appeal

There are no forms or charges for appealing. However, for an appeal to be valid, appellants (the person/operator making the appeal) are legally required to provide the Secretary of State or Welsh Minister with the following (see paragraphs 2(1) and (2) of Schedule 6 of the 2010 Regulations):

- **written notice of the appeal**
- **a statement of the grounds of appeal;**
- **a copy of any relevant application;**
- **a copy of any relevant environmental permit;**
- **a copy of any relevant correspondence between the appellant and the regulator;**
- **a copy of any decision or notice which is the subject matter of the appeal; and**
- **a statement indicating whether the appellant wishes the appeal to be in the form of a hearing or dealt with by way of written representations.**

Appellants should state whether any of the information enclosed with the appeal has been the subject of a successful application for confidentiality under regulation 48 of the 2010 Regulations and provide relevant details – see below. Unless such information is provided all documents submitted will be open to inspection.

Where to send your appeal documents

Appeals should be despatched on the day they are dated, and addressed to:

The Planning Inspectorate
Environmental Appeals Team
Room 3/25 Hawk Wing
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN

If an appeal is made, the main parties will be kept informed about the next steps and will also normally be provided with additional copies of each other's representations.

To withdraw an appeal – which may be done at any time - the appellant must notify the Planning Inspectorate in writing and copy the notification to the local authority who must in turn notify anyone with an interest in the appeal.

Costs

The operator and local authority will normally be expected to pay their own expenses during an appeal. Where a hearing or inquiry is held as part of the appeal process, by virtue of paragraph 5(6) of Schedule 6, either the appellant or the authority can apply for costs. Applications for costs are normally heard towards the end of the proceedings and will only be allowed if the party claiming them can show that the other side behaved unreasonably and put them to unnecessary expense. There is no provision for costs to be awarded where appeals are dealt with by written representatives.

Confidentiality

An operator may request certain information to remain confidential, ie not be placed on the public register. The operator must request the exclusion from the public register of confidential information at the time of supply of the information requested by this notice or any other notice. The operator should provide clear justification for each item wishing to be kept from the register. The onus is on the operator to provide a clear justification for each item to be kept from the register. It will not simply be sufficient to say that the process is a trade secret.

The test of whether information is confidential for the purposes of being withheld from the public register is complex and is explained, together with the procedures, in chapter 8 of the PPC General Guidance Manual.

National security

Information may be excluded from the public register on the grounds of National Security. If it is considered that the inclusion of information on a public register is contrary to the interests of national security, the operator may apply to the Secretary of State/Welsh Ministers, specifying the information and indicating the apparent nature of risk to national security. The operator must inform the local authority of such an application, who will not include the information on the public register until the Secretary of State/Welsh Ministers has decided the matter.

SCHEDULE 2

PERMIT REFERENCE NUMBER: PPC91978
AS VARIED BY THIS VARIATION NOTICE REFERENCE: PPC91978 – V3



Permit Reference Number PPC91978

Original Authorisation Application Received: 28 September 1992

Original Authorisation Reference Number: 91978

THE POLLUTION PREVENTION AND CONTROL ACT 1999

ENVIRONMENTAL PERMITTING (ENGLAND & WALES) REGULATIONS 2016

SI 2016 No. 1154

Sandwell Metropolitan Borough Council (hereafter known as “the Council”) under Regulation 13 of the Environmental Permitting (England & Wales) Regulations SI 2016 No. 1154, hereby authorises:

Ramsden and Whale Limited
Harrold Street
Great Bridge
Tipton
West Midlands
DY4 0JF

at the above address, to operate coating activities as prescribed in Chapter 6, Section 6.4 Part B(a)(iv) of Schedule 1 and Schedule 14 activity of SI 2016 No. 1154 in accordance with the conditions as detailed on pages 7 to 17

STATUS LOG			
DETAIL	REFERENCE	DATE	COMMENTS
Permit Issued	PPC91978	15 July 2005	
Permit Variation Issued	PPC91978 – V1	2 September 2008	
Permit Variation Issued	PPC91978 – V2	01 April 2015	
Permit Variation issued	PPC91978 – V3	22 July 2024	Relocation of spray booth (Drum lid lacquering line)

Installation Description

The external and internal coating of metal drums of 205 litres capacity or less in connection with a drum re-conditioning and manufacturing operations using more than 5 tonnes of organic solvent in any twelve-month period. The process comprises the following operations.

1. The shot blasting of drums in two automatic "Barrel Blaster" machines, emissions from which discharge to the internal environment after passing through one of two cyclones;
2. The application of paint to metal drums in two dry back spray booths with automated spray guns.
3. The application of lacquer to metal drums and lids in two dry back spray booths with automated spray guns.
4. The drying of coatings in 4 drum ovens which are heated by gas fired burners.
5. The storage of paints and solvents in containers of 205 litres or less.

Table A - List of Process Areas within the Installation and Associated Emission Points, Pollutants of Concern and Abatement Plant Required.

Table A				
	Area/Machinery Identification	Pollutants Emitted	Emission Limit Conditions in Permit	Abatement Plant
1	Waste gases from spray booth (New Drum line)	Particulate	Condition 2.1	Dry Back Filtration
2	Waste gases from spray booth (Reconditioning Line)	Particulate	Condition 2.1	Dry back filtration
3	Waste gases from lacquer booths (Drum lid)	Particulate	Condition 2.1	Dry Back Filtration
4	Waste gases from lacquer booth (Drum body)	Particulate	Condition 2.1	Dry Back Filtration

CONDITIONS

The requirements of the conditions attached to this Permit shall come into effect on the date indicated in the individual condition or if no date is indicated shall take effect forthwith.

1.0 The Permitted Installation

- 1.1 The permitted installation shall be comprised of the activities and associated activities specified in Table 1.1

Table 1.1	
Activity listed in Schedule 1 and Schedule 14 of the regulations or Directly Associated Activity	Description of specified activity
Section 6.4 – Coating Activities, Part B (a) (iv)	The application of paint involving the use 5 tonnes or more of organic solvent in any 12-month period.
Schedule 14 activity	Any activity in which a single or multiple application of a continuous film of a coating is applied to metallic and plastic surfaces;
Directly Associated Activity	Operation of 4 gas fired drum drying ovens

- 1.2 The activities permitted under condition 1.1 shall not extend beyond the site, being the area outlined as hatched on the Site Plan PPC94028/A in Appendix 1 to this Permit.

- 1.3 If the operator proposes to make a change in operation of the installation, the Council must be notified in writing at least 28 days before the change is made. The notification must contain a description of the proposed change in operation. In this condition “change in operation” means a change in the nature or functioning, or an extension of the installation, which may have a negative effect on human health or the environment. A change in the nominal capacity of volatile organic compounds (VOC) usage, if likely to lead to an increase of emissions of volatile organic compound of more than 10%, or total solvent input is more than 20 tonnes per annum shall be classed as a change for the purposes of this condition.
- 1.4 The best available techniques shall be used to prevent or, where that is not practicable, reduce emissions from the installation in relation to any aspect of the operation which is not regulated by any other condition of this permit

2.0 Solvent Emission Controls

- 2.1 The operator shall achieve the ‘Target Emission’ relating to the Solvent Reduction Scheme Compliance route as detailed in PG6/15(14) Secretary of State’s Guidance for Coating in Drum Manufacturing and Reconditioning.
- 2.2 For installations where the annual solvent use is between 5-15 tonnes in any 12-month period or more than 15 tonnes in any 12-month period, the Total Annual Solvent Emission from the coating activity shall not exceed the Target Emission where:

Coating Activity (Annual Solvent Usage)	Target Emission =
Non-food coating (5-15 tonnes)	Total Mass of Solids x 0.6
Food contact coating (5-15 tonnes)	Total Mass of Solids x 0.93
Non-food coating (15 tonnes or more)	Total Mass of Solids x 0.37
Food contact coating (15 tonnes or more)	Total Mass of Solids x 0.58

The ‘Total Mass of Solids’ being the annual consumption of all materials in coatings, inks etc that become solid as a result of curing, polymerisation, or the evaporation of the water or solvent i.e. the non-volatile content of the coating or ink. All ingredients other than water and organic solvent should be assumed to form part of the solid coating.

- 2.3 In order to demonstrate compliance with this condition a calculation of the “Annual Solvent Emission” and the “Total Mass of Solids” and “Target Emission” shall be carried out annually in accordance with Appendix 2 – Solvent Management Plan for the Solvent Reduction Scheme, where the terms “Annual Solvent Emission” and “Total Mass of Solids” are defined.
- 2.4 The accounting period shall be each calendar year unless separately agreed in writing with the Council. These calculations shall be submitted to the Council within three months of the end of the accounting period.

2.5 At no time shall the operator introduce any substance or preparation into the installation that because of their VOC content have been assigned the following Hazard Statement (H340, H341), H350, H351, H350i, H360D or H360F) without the prior written consent of the Regulator.

3.0 Emission Limits

3.1 The limits for emissions to air, set out in Table 3.1, shall not be exceeded:

Row	Source	Emission	Limit / Provision	Type of Monitoring	Frequency of Monitoring
1	Waste gases from spray booth (New Drum line)	Particulate	50 mg /Nm ³ as 30-minute mean for contained sources	Manual extractive testing. See 3.3 to 3.6.	At least once every two years
2	Waste gases from spray booth (Reconditioning Line)	Particulate	50 mg /Nm ³ as 30-minute mean for contained sources	Manual extractive testing. See 3.3 to 3.6.	At least once every two years
3	Waste gases from lacquer booths (Drum lid)	Particulate	50 mg /Nm ³ as 30-minute mean for contained sources	Manual extractive testing. See 3.3 to 3.6.	At least once every two years
4	Waste gases from lacquer booth (Drum body)	Particulate	50 mg /Nm ³ as 30-minute mean for contained sources	Manual extractive testing. See 3.3 to 3.6.	At least once every two years

A layout of the process, is contained in Appendix 3

3.2 All pollutant concentrations shall be expressed at reference conditions, 273.15K, 101.3kPa, without correction for water vapour content and the results shall be expressed as mg/m³.

3.3 Emissions from the sources detailed in Table 3.1 (Condition 3.1) shall be monitored at least once every two years, to ensure compliance against the emission limits specified in that table.

3.4 The introduction of dilution air to achieve or maintain any emission concentration limit or standard contained in this permit shall not be permitted. If emission concentration limits are being met or do not apply, dilution air shall be permitted to render harmless a visible or an odorous emission.

3.5 All emissions to the air from the stacks serving the drying oven and spray booths shall be colourless and free from persistent mist, other than steam or water vapour, free from droplets and free from persistent fume.

- 3.6 Emissions from any process exhaust point or building opening shall in normal operation be free from visible smoke and in no circumstances shall exceed the equivalent of Ringlemann Shade 1 as described in British Standard BS 2742:2009.
- 3.7 All emissions to air from any part of the process shall be free from offensive odour outside the site boundary of the installation, as perceived by an authorised Inspector of the Council.
- 3.8 Odour masking agents and counteractants shall not be used unless agreed in writing with the Council.
- 3.9 There shall be no emissions to the air of visible dust or particulate matter from building openings and process exhaust points.

4.0 Monitoring of Emissions and Process Operation

- 4.1 Emission monitoring as specified in any condition of this permit for particulate matter shall be conducted in accordance with the main procedural requirements of BS ISO 9096:2017 or as agreed in writing with the Council, with averages taken over operating periods excluding start-up and shut down.
- 4.2 The proposed test methods for measuring compliance with the emission concentration limits detailed in this permit shall be forwarded to the Council at least 21 days prior to commencement of sampling, and testing shall not be commenced until the Council approve the proposed test methods in writing.
- 4.3 The results of all emission testing carried out in accordance with this permit shall be notified to the Council in writing within 8 weeks of the completion of sampling.
- 4.4 Any adverse results from any monitoring exercise shall be investigated by the operator as soon as the monitoring data has been obtained / received. The Operator shall:
- a) Notify the Council of the failure
 - b) Identify the cause of the failure and take corrective action
 - c) Record as much detail as possible regarding the cause and extent of the problem and any corrective action taken by the Operator to rectify the situation
 - d) Re-test, where appropriate, to demonstrate compliance as soon as possible
 - e) Record the above details in accordance with the requirements of condition 8.5.
- 4.5 Emissions from the shot blast unit serving the two automatic "Barrel Blaster" machines shall discharge to the internal environment after passing through one of two cyclones.

5.0 Operational Controls and Material Handling

- 5.1 Spillages shall be cleared as soon as possible, and where the spilled materials are potentially odorous, the materials should be placed into a closed container. Liquid spillages shall be contained and removed by the use of a suitable absorbent material. Where the spilled materials are finely divided and potentially dusty, cleaning shall be carried out using vacuum cleaning or wet methods.
- 5.2 All drummed raw materials shall be inspected for leakage on delivery and at least once per day. All drummed waste materials shall be inspected for leakage at least once per day. Any leakage identified shall be dealt with immediately, and the actions taken recorded in the log book required in accordance with condition 8.5.
- 5.3 All potentially odorous materials or materials containing organic solvents (including waste materials), shall be stored in closed containers.
- 5.4 All reasonable steps shall be taken to minimise the amount of residual organic solvent bearing material left in drums and other containers after use.
- 5.5 Cleaning of equipment shall be undertaken in such a way as to minimise fugitive emissions of solvents. Where practicable, fixed equipment shall be cleaned in-situ, and such equipment shall be kept enclosed whilst cleaning is carried out.
- 5.6 All potentially dusty materials and wastes which are stored outside the building shall be stored in covered or enclosed skips or containers or in a dust reduced form to prevent the fugitive emission of dust.
- 5.7 Equipment for the spray application of all coatings shall be applied with air assisted airless, centrifugal, high volume low pressure (maximum atomization pressure of 69KPa (10Psi)), electrostatic application, or any other application equipment approved in writing by the Council, which can achieve a paint transfer efficiency of at least 65%.

6.0 Arrestment Equipment

- 6.1 Emissions from all spray booths and lacquer booths shall be contained by the use of extract ventilation vented to arrestment plant capable of meeting the requirements specified in conditions 2.1 and 3.1.
- 6.2 Emissions from the shot blast machine shall be contained by the use of extract ventilation vented to suitable arrestment plant capable of meeting the requirements specified in condition 3.1.
- 6.3 Residues collected by particulate matter control equipment shall be removed from the equipment on a regular basis to prevent the accumulation of material in the equipment adversely affecting the equipment performance.
- 6.4 Residues collected by the particulate matter control equipment shall be discharged into a sealed container and remain contained until removed from site for disposal. The removal of residues shall only take place when the extraction is not in use.

7.0 Chimneys

- 7.1 All ovens, chimneys and duct work shall be leakproof if under negative pressure and gas tight if under positive pressure.
- 7.2 Chimney flues and duct work shall be inspected at least once every 6 months and where the inspection reveals it necessary, the chimney flues and duct work shall be cleaned and / or repaired. The inspection and any remedial action taken shall be recorded in the log book required to be kept in accordance with condition 8.5.
- 7.3 Chimneys and vents shall not be fitted with any restriction at the final opening, such as a plate, cap or cowl.
- 7.4 The final discharge height of the stacks serving the spray booths shall be vertical, unrestricted and sufficient to prevent offensive odour beyond the process site boundary as perceived by an Authorised Inspector of the Council.
- 7.5 The final discharge height of the stacks serving the gas fired drum ovens shall be vertical and unrestricted to ensure dispersion of emissions is not impaired. Stack height is calculated by following the methodology in Technical Guidance D1 “Guidelines on Discharge Stack Heights for Polluting Emissions (as amended to take account of current air quality objectives and locally measured background concentrations).

8.0 General Operations

- 8.1 Any malfunction or breakdown leading to abnormal emission should be dealt with promptly and process operations adjusted until normal operations can be restored. All such malfunctions must be recorded in the log book referred to in condition 7.1 together with the corrective action taken. Should such malfunction or breakdown have any effect outside the process boundary, the Council must be informed as soon as possible by email to pollution_control@sandwell.gov.uk
- 8.2 The Operator shall maintain and implement written procedures to ensure that regular cleaning and effective preventative maintenance in accordance with the manufacturer's instructions is employed on all plant, equipment and technical means concerned with the production, capture, transport, control and exhaust of emissions which could lead to an adverse impact on the environment. This shall include procedures for the replacement of filters in the dry back spray booths, maintenance of the water curtain to the wet back spray booths and particulate arrestment plant serving the shot blast equipment. A record of relevant maintenance shall be maintained in accordance with Condition 8.5
- 8.3 Spares and consumables, particularly those subject to continual wear shall be held on site or shall be available at short notice from guaranteed suppliers, so that spray booth plant breakdowns can be rectified rapidly.

- 8.4 The Installation shall be supervised by suitably trained staff who are fully conversant with the requirements of this Permit. All such staff shall be fully conversant with those aspects of the Permit conditions, which are relevant to their duties and shall be provided with adequate professional technical development and training and written operating instructions to enable them to carry out their duties. The Operator shall maintain a record in accordance with Condition 8.5 of the skills and training requirements for all staff whose tasks in relation to the Installation may have an impact on the environment and shall keep records of all relevant training.
- 8.5 The Operator shall ensure that all records required to be made by this Permit and other records made by it in relation to the operation of the Installation shall:
- (a) be made available for inspection by the Council at any reasonable time;
 - (b) be supplied to the Council on demand and without charge;
 - (c) be legible;
 - (d) be made as soon as reasonably practicable;
 - (e) indicate any amendments which have been made and shall include the original record wherever possible; and
 - (f) be retained at the Installation, or other location agreed by the Council in writing, for a minimum period of 4 years from the date when the records were made, unless otherwise agreed in writing.

END OF PERMT CONDITIONS

Signature:



Name: Liann Brookes-Smith

Position: Interim Director of Public Health
An Authorised Officer of the Council

Date: 22 July 2024.

Appendix 1



Appendix 2 - Solvent Management Plan for the Solvent Reduction Scheme

This Solvent Management Plan is the means by which compliance with the Solvent Reduction Scheme is assessed. The information detailed below shall be compiled for each accounting period and submitted to the Council within three months of the end of the accounting period:

1. Determination of Annual Solvent Consumption
2. Calculation of the Total Mass of Solids for the annual accounting period
3. Calculation of the Target Solvent Emission for the annual accounting period
4. Calculation of the Actual Solvent Emission for the annual accounting period
5. Statement of Compliance

The steps required to carry out the above calculations are provided in the following boxes Steps 1 to 5 and contain information extracted from the relevant process guidance note. In some cases the procedure will be simpler than that outlined, such as the case where there are no solvent wastes recovered for reuse.

For the purposes of consistency the various I and O parameters detailed below have been assigned numbers which correspond to those assigned to the same parameters in the “Secretary of State’s Process Guidance Note”.

Step 1: Determination of Annual Solvent Consumption

The following steps should be followed:

(1) Record the following details:

- (a) the mass of solvent contained in raw materials and preparations in the initial stock (**IS**) at the start of the accounting period, plus;
- (b) the mass of solvent contained in raw materials and preparations in the purchased stock (**PS**) during the accounting period;
- (c) the mass of solvent contained in raw materials and preparations in the final stock (**FS**) at the end of the accounting period.

(2) Calculate the total organic solvent input using the formula $I_1 = IS + PS - FS$

(3) Calculate and state the annual consumption of organic solvent (C) using the following:

$$C = I_1 - O_8$$

Where: I_1 = Total quantity of organic solvents or their quantity in preparations purchased which are used as input into the process/activity.

O_8 = Organic solvents contained in preparations recovered for reuse but not as input into the process/activity.

(4) From the calculation of total organic solvent input in (2) above, determine whether any of the products, substances or preparations are designated assigned or needs to carry the Hazard Statements (Risk Phrases) H340 (R46), H341 (R68), H350 (R45), H351 (R40), H350i (R49), H360D or H360F (R60 or R61). If any such materials are identified their individual product description, hazard statement designation, quantity (kilograms) and product use shall be detailed.

Step2: Calculation of the Total Mass of Solids

“Total mass of solids” for the annual accounting period is the **total mass of solids in the quantity of coating consumed in a year**

- solids are all materials in coatings that become solid as a result of curing, polymerisation, or the evaporation of the water or solvent
- all ingredients other than water and organic solvents should be assumed to form part of the solid coating

Step 3 Calculation of the Annual Target Emission

For installations where the annual solvent use is above 15 tonnes in any 12 month period:

Non-Food Coating Annual Target Emission = Total mass of solids used annually x 0.37

Food Contact Coating Annual Target Emission = Total mass of solids used annually x 0.58

Step 4: Calculation of the Total Annual Solvent Emission

The **annual actual solvent emission** is calculated as follows:

Annual actual solvent emission = $I_1 - O_8 - O_7 - O_6$ (– O_5 if abatement has been used)

Definitions

- I_1 The quantity of organic solvents, or their quantity in preparations purchased which are used as input into the process/activity (including organic solvents used in the cleaning of equipment, but not those used for the cleaning of the products).
- O_8 Organic solvents contained in preparations recovered for reuse but not as input into the process/activity, as long as not counted under O_7 .
- O_7 Organic solvents, or organic solvents contained in preparations, which are sold or are intended to be sold as a commercially valuable product.
- O_6 Organic solvents contained in collected waste.
- O_5 Organic solvents and/or organic compounds lost due to chemical or physical reactions. (including for example those which are destroyed, e.g. by thermal oxidation or other waste gas or waste water treatments, or captured, e.g. by adsorption, as long as they are not counted under O_6 , O_7 or O_8).

Step 5: Statement of Compliance

Compliance with the Solvent Reduction Scheme is achieved if the **Total Annual Solvent Emission** (Step 4) is less than the **Target Emission** (Step 3) for the same annual accounting period.

Appendix 3 – Layout Of Process – location of spray booths

