

William Tracey Ltd
60 Main Street
Paisley
PA3 1QJ

24 March 2010

FAO: Scott Cairns

Dear Sir

**POLLUTION PREVENTION AND CONTROL ACT 1999
POLLUTION PREVENTION AND CONTROL (SCOTLAND) REGULATIONS 2000 ("the Regulations")
APPLICATION BY: WILLIAM TRACEY LTD
SITE: 60 MURRAY STREET, PAISLEY, PA3 1QJ
PERMIT REFERENCE NUMBER: PPC/A/1016807**

Further to your application for a variation to the above permit under regulation 13 of the Regulations, I enclose your notice of variation.

Should you be unhappy with any of the conditions attached you have the right to appeal to the Scottish Ministers providing the conditions have not been applied as a result of a Direction to SEPA from Scottish Ministers. The procedures to be followed in the event of any appeal are set out in Regulation 22 and Schedule 8 to the Regulations. Your appeal must be made in writing to the Scottish Ministers no later than 6 months from the date of this letter in accordance with the procedures specified in Schedule 8 of the above Regulations. A guidance note is attached to this letter for your assistance.

Particular attention should also be paid to the Explanatory Notes attached to the Permit

If you have any queries relating to this letter please contact Andrew Lang at the East Kilbride office, telephone number 01355 574200.

Yours faithfully



Janice Smith
Senior Registry Officer

Enc



Chairman
David Sigsworth

Chief Executive
Dr Campbell Gemmell

East Kilbride Office

Redwood Crescent, Peel Park, East Kilbride G74 5PP
tel 01355 574200 fax 01355 574688
www.sepa.org.uk

GUIDANCE NOTES

Under regulation 22 of the Pollution Prevention and Control (Scotland) Regulations 2000, a person who is aggrieved by the conditions attached by SEPA to a Variation Notice may appeal to the Scottish Ministers. Any person who wishes to appeal under regulation 22 must do so by notice in writing to:

The Scottish Ministers
Scottish Government
c/o Air, Climate & Engineering Unit
Determinations Team
Area 1-G (North)
Victoria Quay
Edinburgh, EH6 6QQ

Appeals must be notified within six months from the date of SEPA's decision. Scottish Ministers may in a particular case allow a longer period for the giving of notice of an appeal.

Any notice of appeal must be accompanied by the following information:-

- a) a statement of the grounds of appeal;
- b) a copy of the relevant application;
- c) A copy of any relevant Permit;
- d) a copy of any relevant correspondence between the appellant and SEPA;
- e) a copy of the decision or notice which is the subject matter of the appeal; and
- f) a statement indicating whether the appellant wishes the appeal to be in the form of a hearing or to be determined on the basis of written representations;

A copy of any appeal notice must also be served on SEPA together with copies of the documents mentioned at paragraphs a) and f) above. Should the appellant wish to withdraw an appeal, they should do so by notifying Scottish Ministers in writing sending a copy of that notification to SEPA.

On determining an appeal, Scottish Ministers will notify the appellant in writing of their decision.

Reference Number: PPC/A/1016807/VN02

SCOTTISH ENVIRONMENT PROTECTION AGENCY

POLLUTION PREVENTION AND CONTROL ACT 1999

**POLLUTION PREVENTION AND CONTROL (SCOTLAND) REGULATIONS 2000
("THE REGULATIONS")**

NOTICE OF VARIATION TO PERMIT

PERMIT No: PPC/A/1016807 (As Varied)

To: William Tracey Limited

**Address: 49 Burnbrae Road
Linwood
Renfrewshire
PA3 3BD**

The Scottish Environment Protection Agency ("SEPA"), in exercise of its powers under Regulation 13(5) of the Regulations, hereby gives you notice that it has decided, following application by you, to vary permit PPC/A/1016807 (As Varied) granted under Regulation 7 of the Regulations in respect of the operation of an installation on a site at 60 Murray Street, Paisley, PA3 1QJ.

The variations are specified in the Schedule to this notice and take effect on 24 March 2010.


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Authorised to sign on behalf of the
Scottish Environment Protection Agency

Date: 24 March 2010

Right of Appeal

Under Regulation 22 of the Regulations you are entitled to appeal to the Scottish Ministers against the conditions attached to this Notice within six months of the date of this Notice, except where SEPA has served this Notice to implement a direction to SEPA of the Scottish Ministers. The bringing of an appeal will not have the effect of suspending the operation of the conditions attached to this Notice. The procedures for the making of an appeal are set out in Schedule 8 of the Regulations.

SCOTTISH ENVIRONMENT PROTECTION AGENCY

POLLUTION PREVENTION AND CONTROL ACT 1999

**POLLUTION PREVENTION AND CONTROL (SCOTLAND) REGULATIONS 2000
("THE REGULATIONS")**

SCHEDULE TO NOTICE OF VARIATION UNDER REGULATION 13(5)

Operator: William Tracey Ltd
Permit Number: PPC/A/1016807 (As Varied)
Date of Permit: 26 October 2007
Variation No: 02

Permit number PPC/A/1016807 (As Varied) has been varied as follows:-

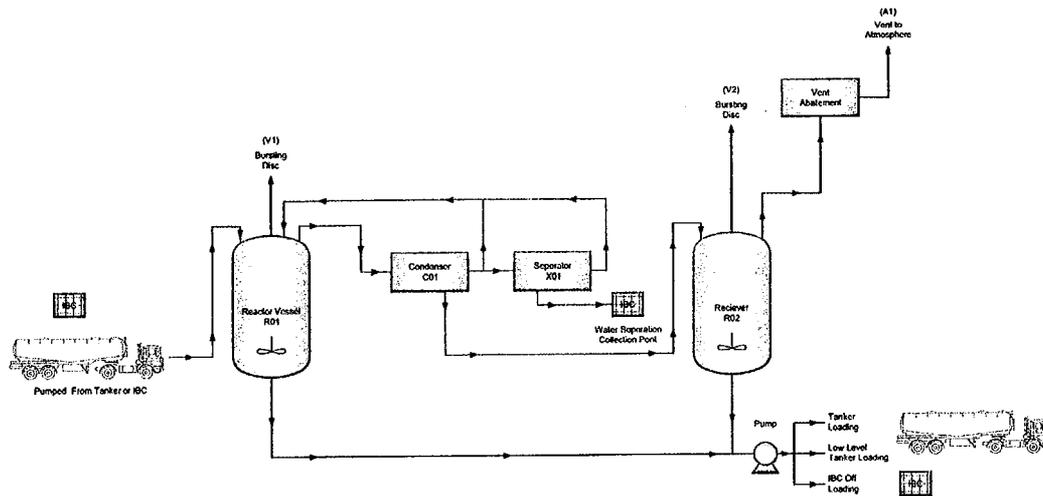
1. The following numbered conditions have all been removed:-

"

1.1.3.3 Recovery by distillation any oil or organic solvent being an activity falling within paragraph (a) of Part A of Section 5.4 of Schedule 1 of the Regulations.

1.1.4.2 Facilities for the recovery of solvent from aqueous waste streams (included for reference purposes only on Figure 1.1). These comprise a 10 tonne (nominal) stainless steel distillation vessel with solid charging facilities, stirrer and sparge, a 15 m² water cooled condenser, a glass condenser trap, a 10 tonne (nominal) stainless steel receiving vessel and associated pumps and pipework. The distillation unit is operated under vacuum (minimum 10 mm Hg) using a liquid ring vacuum pump vented to atmosphere.

Figure 1.1

Waste Solvent Distillation
Flow Diagram

5.9 General rules governing recovery of solvents from aqueous waste.

5.9.1 No aqueous waste stream may be processed in the facilities for the recovery of solvent from aqueous waste streams at the Permitted Installation except where an assessment has been carried out sufficient to demonstrate that:-

- a) the normal boiling point of any substance to be recovered is greater than 60 degrees Centigrade;
- b) any residues arising from the process are thermally stable;
- c) any liquid effluents arising from processing may be discharged in accordance with the terms and conditions of this Permit;
- d) the release of any substance to air from the site does not give rise to a ground level concentration at the site perimeter or beyond in excess of the Environmental Assessment Level specified for that substance in IPPC H1: Environmental Assessment and Appraisal of BAT (ISBN 0 11 3101082);
- e) the release of any substance to air from the process is unlikely to give rise to a concentration in excess of the odour threshold for that substance at the boundary of the premises.

- 5.9.2 Details of all tests and analyses carried out in pursuance of conditions 5.9.1 shall be recorded.
- 5.9.2.1 All assessments undertaken in pursuance of condition 5.9.1 shall be recorded.
- 5.9.2.2 The methods of estimating maximum ground level concentrations shall be as required by condition 5.9.1(d).
- 5.9.3 The total quantity of aqueous wastes that may be recovered in the solvent recovery plant shall not exceed 3,000 tonnes in any year.
- 5.9.4 Aqueous waste streams processed by the solvent recovery facility shall only contain the soluble organic solvents listed in Table 5.1:-

Table 5.1 – Permitted solvent types

Type of Solvent	Variety of Solvent Type
Alcohols	Methyl alcohol, ethyl alcohol, propyl alcohol
Ketones	Methyl iso-butyl ketone (MIBK), methyl ethyl ketone (MEK)
Glycols	Mono-ethylene glycol, di-ethylene glycol, tri-ethylene glycol, mono-propylene glycol
Acetates	Ethyl acetate, iso-propyl acetate
Amines	N,N di-methylaniline, mono-ethanolamine, tri-ethanolamine
Amides	Di-methyl formamide, N-methyl pyrrolidone
Acids	Napthenic acid
Hydrocarbons	Toluene, xylene, white spirits, mixed hydrocarbons (e.g. crude petroleum)

5.9.5 Volatile Organic Compounds

5.9.5.1 The Operator shall estimate the mass of each volatile organic compound (or group of similar volatile organic compounds) released into the atmosphere from the solvent recovery plant during each calendar year. The estimate(s) shall include any release(s) arising from the cleaning of items of process plant after the cessation of a campaign of that recovery.

5.9.5.2 Each estimate required to be made by condition 5.9.5.1 shall be recorded, along with a description of how it has been calculated. Any monitoring work carried out to provide data for the establishment or calibration of a calculation methodology, and any results thereof, shall also be recorded.

5.9.5.3 The Operator shall relate the estimates required to be calculated by condition 5.9.5.1 to production levels by calculating specific release rates for each process (expressed in terms of mass emission per tonne of waste organic solvent processed) for each calendar year. The said estimates shall be recorded and available for inspection.

5.9.6 Condenser Performance

5.9.6.1 The Operator shall establish, maintain and implement a procedure for ensuring that all condensers with a duty to condense organic solvent vapours perform as effectively as is reasonably achievable.

5.9.6.2 The procedure required by Condition 5.9.6.1 shall be documented in writing and, as a minimum, shall address:

- (a) the maintenance of appropriate cooling medium temperatures;
- (b) the maintenance of appropriate cooling medium flow-rates;
- (c) the minimisation and management of the fouling of heat transfer surfaces; and
- (d) if a cooling medium is at a temperature of less than 0 °C, the potential for ice formation on heat transfer surfaces.

5.9.6.3 The implementation of the procedure required by Condition 5.9.6.1 (including any process monitoring data) shall be recorded.”