



Our Ref: EP 67/21

Your Ref:

15 December 2021

By Email:

Dear

**ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2016, AS AMENDED
ITW LIMITED, ITW IMAGEDATA, FACTORY LANE, BRANTHAM, MANNINGTREE, CO11 1NL**

I refer to my inspection of the permitted installation at the above address on 12 October 2021. My colleague Andy Rutson-Edwards also attended this inspection. This was the first inspection to be conducted since the Permit was transferred to the Local Authority as the Regulator.

The inspection consisted of a general site tour to outline the operations.

I note that the Permit has not been updated to reflect the current steam generator and regenerative thermal oxidiser, and the emissions monitoring that is required from these. However, the correct monitoring is being conducted and I will vary the Permit when possible. Thank you for sending the emissions reports to me, which all show compliance. I note that emissions monitoring was not conducted during the first half of 2020 due to Covid-19 restrictions, but I have received the reports for the second half of 2020 and the first half of 2021. I understand that monitoring will be conducted next week for the second half of 2021.

During the inspection, we discussed that waste solvent from washing down goes into a yellow tank and then into a grey tank that is removed from site. I understand that the yellow tank has a high level alarm, and may be useful as a holding tank, but you were going to consider whether it was still necessary. Also in this area, there was a channel with a small volume of flowing water with an oily film. You agreed to look into where this is from and where it flows to. Please could you provide an update on this by **Friday 14 January 2022**. I would also ask that you ensure that all containers with solvent containing liquids are stored on an appropriately sized spillage tray. During the inspection, there were four drums containing a thick resin in the dry material storage area but not on a tray. I understand that the dry material storage area will not always contain liquid in drums, but when it does, they should be appropriately stored.

Following an inspection, the Council is obliged to 'risk rate' the installation based on guidance issued by the Department for Environment, Food and Rural Affairs (DEFRA). Please find enclosed a copy of the risk rating for the installation, which takes into account the findings of my inspection. However, as I have not been able to consider all matters during this initial inspection, there may be scorings that are currently zero (i.e. I have not penalised you) which may become five or ten if I look into these areas further and



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find that the relevant information is not available. We will discuss more matters over time, and hopefully the site will remain low risk. The risk rating is used to determine the frequency of inspections made by the Council. To encourage good environmental practice, the amount payable each year for the subsistence of a permit is also linked to the risk rating score. The risk rating method and the current fees and charges scheme can be found at:

<https://www.babergh.gov.uk/environment/environmental-permits/permits/>

Thank you for your time and co-operation during my visit.

Please do not hesitate to contact me if you wish to discuss any of the points raised or require further information.

Yours sincerely



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