

BAE SYSTEMS

Part B Environmental Permit PPC/B/05

LAPPC Annual Report 2013

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Executive Summary

BAE Systems Maritime – Submarines (BAES) use a Solvent Reduction Scheme for preventing and minimising emissions of Volatile Organic Compounds (VOC) and are required to submit an annual report each year, accompanied by two Solvent Management Plans (SMP), in order to demonstrate compliance with the Part B Environmental Permit issued by the Local Authority.

For the period 1st November 2012 – 31st October 2013, the annual actual solvent emission determined from the SMP's are both less than the target emission, demonstrating compliance with the Solvent Reduction Scheme.

1. Introduction

BAE Systems Maritime – Submarines (BAES) is an installation regulated under the statutory Local Air Pollution Prevention and Control (LAPPC) Regime for Coating and Adhesive Processes. The annual solvent consumption of activities at the site is greater than 5 tonnes and therefore requires a Part B Environmental Permit, issued under the Environmental Permitting (England and Wales) Regulations 2010 (EPR10), by the Local Authority.

The activities covered by the Permit include the cleaning and painting of surfaces during the manufacture of submarines, and the use of adhesive coatings, as defined in Sections 6.4 Part B and Section 7 Part B (a) of Schedule 1 of EPR10. Surface preparation and shot blasting are directly associated activities and controlled under the Permit.

BAES also operate a Di-isocyanate process regulated under Section 4.1 Part B of Schedule 1 of EPR10; however an exemption was granted on the grounds of triviality as the process emits prescribed substances to air in such small quantities that they are incapable of causing harm. This activity is therefore not regulated by the Permit, although conditions on the judgement of the exemption are to be complied with.

Both BAES and the Integrated Outfit Package (IOP) arrangement (Redhall Marine/Barrier) are responsible for ensuring compliance with the Permit.

2. Non VOC Emissions Limits

The annual monitoring of non-VOC emissions, namely Particulate Matter, was conducted in August 2013 with the report issued to the Local Authority, within the specified period, on the 16th September 2013. All results were found to be within the specified limits.

3. Reduction Scheme

BAES complies with the LAPPC Regime and the EU Industrial Emissions Directive through the Solvent Reduction Scheme. This requires BAES to determine solvent consumption in the manufacturing process and to achieve emission reductions to a 'target emission' that is equivalent to those which would have been achieved if the concentration limits had been applied. The Solvent Management Plan (SMP) for 2013 contains data for the period 1st of November 2012 - 31st October 2013.

The SMP calculates a target emission for VOC by multiplying the total mass of solids in coatings, over a 12 month period, with the Target Emission Figure (0.6 – Paints / 1.2 - Adhesives) for solvent consumption between the 5 – 15 tonne threshold.

3.1. Coating of Metal and Plastic Processes (Painting)

The target emission for the reporting period for the coating of metal and plastic processes was 14,163 tonnes. The actual emission was 8,322 tonnes with a difference of 5,841 tonne, demonstrating compliance with the reduction scheme.

3.2. Adhesive Processes

The target emission for the reporting period for the adhesive processes was 907 tonnes. The actual emission was 465 tonnes with a difference of 422 tonnes, demonstrating compliance with the reduction scheme.

4. Future Reduction Options

The permit also requires, in addition to complying with the target emission, that future reduction options are considered and included in the annual report. This includes mechanisms to decrease the average solvent content of the total input and/or systems to increase the efficiency in the use of solids to achieve a reduction of the total emissions from the installation.

BAES use coatings that are based on performance requirements, VOC and health and safety criteria of the Ministry of Defence (MOD).

The MOD makes it a requirement for low VOC materials, and paint manufacturers and suppliers are reminded that any formulation changes to their existing products must be advised. They will then be required on request, to provide the Institute of Naval Medicine (INM), with full product formulation data. Failure to do so will automatically result in the withdrawal of MOD acceptance.

For the benefit of New-Building Specifications, if a paint system can offer cost benefits but one part of it has a VOC level higher than the MOD target value, the actual VOC value must be equal to or less than the current stated value. Data will be required supporting the case, including a statement that the total VOCs' to be given off to the atmosphere during application, will be equal to or less than when applying a paint scheme fully in accordance with the MOD target values.

Warpaint (MOD, 2012) remains the main guidance document of acceptable paint coatings for in-service and new-build Royal Naval Vessels.

BAES also intend to upgrade the paint mixing/waste paint area, and although compliance is through the Reduction Scheme, consideration is being given to the use of carbon filters to minimise VOC emissions. BAES will notify the Local Authority once plans have been confirmed and submit the variation application.

5. Control Techniques

BAES adhere to the control techniques specified in the permit to minimise fugitive releases, where the SHE department conduct annual audits on areas regulated by the Permit.

6. Air Quality

All of the emission stacks on site continue to meet the requirements of the permit.

7. VOC Cleaning Review

BAES currently uses various solvents containing volatile organic compounds (VOCs) for the purpose of cleaning. This section looks at the processes and substances used, to identify ways for BAES to decrease its solvent emissions. The two processes under the permit that require the use of cleaning solvents are the coating of metal and plastic processes, and adhesive coatings.

BAES uses Methylene Chloride which is a designated risk phrase material (R40) as part of the cleaning process for the di-isocyanate activity to remove residues of polyurethane from the casting machines only. Although the di-isocyanate activity falls within the scope of the Environmental Permitting (England) Regulations 2010, this is exempt under triviality. Alternatives to Methylene Chloride have been explored in the past but BAES are bound by Ministry of Defence (MoD) technical specifications and, at present, no suitable alternative has been identified.

Dissolvit FD1000 is a citrus based degreasing agent that BAES continues to use. It has been brought into the degreasing process as a result to reduce the use of Bostik M501, which is both highly volatile and flammable, and therefore had benefits in terms of fire safety and environmental impact. It is not possible to use Dissolvit FD1000 for all applications as the citrus content leaves a residue that is not permitted in some quality aspects.

For the period 2012-2013, for both Painting and Adhesive processes, BAES are well within the Target Emission Factor set by the Reduction Scheme, although there has been an increase in solvent consumption related to the painting processes. The solvent consumption for cleaning of equipment however, has not increased. The vast majority of the thinners are used to clean spray guns.

Many of the cleaning solvents used are required by MoD specifications so there is limited scope to change.

8. Appropriate Management Systems

BAES operate an Environmental Management System, accredited to the international standard, ISO 14001, in addition to both Health and Safety (18001) and Quality (9001) Management Systems. Our EMS requires the company to continually improve its practises to remain certified. LRQA audit the company on several occasions throughout the year and re-certify every 3 years. Re-certification is due on 1st January 2015.

References

MOD (2012) Warpaint. Defence Equipment and Support. Available:
<https://www.gov.uk/government/publications/warpaint>