COVENTRY CITY COUNCIL



ENVIRONMENTAL PROTECTION ACT 1990, SECTIONS 8(8), 12

NOTICE OF REVOCATION



To: Marvic-Empe Ltd Bodmin Road COVENTRY CV2 5DY

Coventry City Council ("the Council"), in exercise of the powers conferred on it by section 8(8), 12 of the Environmental Protection Act ("the Act"), hereby gives you notice as follows:

(for section 12(1) notices)

1. The authorisation reference 047 is hereby revoked with effect from 5th November 1997.

Signed on behalf	of Coventry	y City Council	
City Environmer The officer appo		t purpose	
City Environmen The officer appo		t purpose	

Date: 10th Celaber 1997



CERTIFICATE OF SERVICE BY HAND

Signed

EH/EP/MHK (em) M Hardy-King 831807 10th March 1994

THE ENVIRONMENTAL PROTECTION ACT 1990

The Environmental Protection (Prescribed Processes and Substances) Regulations 1991, SI 472.

The Environmental Protection (Application, Appeals and Registers) Regulations 1991, SI 507.

Authorisation No: 047

Application Received: 28th September 1992

Notice is hereby given that under the Environmental Protection Act 1990 Coventry City Council (hereafter called the Authority) gives authorisation to:

Marvic Empe Ltd Bodmin Road Coventry CV2 5DY

Register in England No: 1905434

For the coating of veneered wood as described on Page 2 at:

Unit 1
Marvic Empe Ltd
Bodmin Road
Coventry
CV2 5DY

subject to the conditions specified on the attached pages, Nos 1 to , and within the process boundary as indicated on Plan No. 1.

1. DESCRIPTION OF PROCESS

- 1.1 This authorisation is for the coating of veneered wood, as described in the Environmental Protection (Prescribed Processes and Substances) Regulations 1991, SI472, Section 6.5 Part B paragraph (b) within the process boundary outlined in red on the attached Plan numbered 1 and specifically relates to the processes outlined below.
- 1.2 The delivery and storage of lacquers, thinners, sealers, blotters and cleaning solvents in the General store as shown in the Plan numbered 1.

1.3 PROCESS A

- 1.3.1 The sealing of sanded parts using hand wiping application and spray application of blotter for edges.
- 1.3.2 The repair of parts with filler, then sanding and resealing by hand.
- 1.3.3 The spraying of parts with an acrylic gloss coating employing an automatic sprayline.
- 1.3.4 The ultra violet curing of the lacquer.
- 1.3.5 The sanding by hand or autosander of the parts employing suitable arrestment equipment and the adjoining of fixings to the rear of the parts.
- 1.3.6 The spraying of parts with acrylic top coat employing suitable spraying techniques.
- 1.3.7 The Ultra Violet curing of the lacquer.
- 1.3.8 Final denibbing and polishing to make the part ready for despatch.

1.4 PROCESS B

- 1.4.1 The staining of the components with a water and oil based stain in the staining/sealing spraybooth employing a hand spraying technique.
- 1.4.2 The sealing of the components with a seal in the staining/ sealing spraybooth employing a hand spraying technique.
- 1.4.3 Necessary faults are repaired by hand brush or air brush application of paint in the touching in area.
- 1.4.4 The spraying of 4 coats of a polyester coating wet on wet, followed by 3 day air curing.
- 1.4.5 The sanding of parts by hand or belt sander employing suitable arrestment equipment.

- 1.4.6 The final polishing of the parts for inspection and packaging.
- 1.5 Any change to the above descriptions must not take place without the prior consent from this Authority.

2. EMISSION LIMITS AND CONTROLS

- 2.1 All emissions to air shall be free from offensive odour outside the process boundary, as perceived by the local Authority Inspector.
- 2.2 There shall be no emissions of particulate matter noticeable beyond the process boundary.
- 2.3 All pollution concentrations shall be expressed at standard conditions of 273K and 101.2Kpa without correction for water vapour content.
- 2.4 The introduction of dilution air to achieve the emission concentration limits in this authorisation is not permitted. Exhaust flow rates should be consistent with the efficient capture of emissions.

3. MONITORING SAMPLING AND MEASUREMENT OF EMISSIONS

- 3.1 A visual assessment of particulate emissions from the spray booths area shall be carried out at least once a day while spraying operations are in progress. This shall be carried out by making an assessment of paint deposits beyond the process boundary.
- 3.2 An olfactory assessment of emissions of volatile organic compounds shall be carried out at least once a day from the position marked x on the Plan numbered 1.
- 3.3 The results of monitoring to comply with 3.1 and 3.2 shall be recorded in a log book. This shall include the date, time, wind strength and direction, the name of the observer and an assessment of the emissions. This log book shall be retained, on site, for a minimum of four years.
- 3.4 Any adverse results from the monitoring required in 3.1 and 3.2 shall be followed up immediately by the investigation of the cause of the emission and any corrective action taken, with this also being recorded in the log book.
- 3.5 A detailed record shall be kept of all organic solvents used in the prescribed processes. This shall include cleaning solvent usage, diluent solvent usage and solvents contained within coatings used. This inventory shall be forwarded to the local Authority at least once every six months and shall include a determination for the total organic solvent usage for that period.

4. MATERIALS HANDLING

- 4.1 The cleaning of spray guns and other equipment shall only be carried out in the waterwash spraybooth.
- 4.2 The mixing of coatings shall only be carried out in the coating mixing area.
- 4.3 spray gun testing, following cleaning shall only be carried out in the spray booths. This shall only be undertaken while the spray booths are in proper working order.
- 4.4 All full, partially full and nominally empty containers which hold or have held materials which contain organic solvents must be stored in the pre-determined store and have lidded containers.

5. CHIMNEYS, VENTS AND PROCESS EXHAUSTS

PROCESS A

- 5.1 Emissions from the hand wiping of sealant shall only be emitted via the ducted extraction system.
- 5.2 Emissions from the application of blotter shall only be emitted via the waterwash spraybooth and then ducted to atmosphere.
- 5.3 Emissions from the application of acrylic gloss shall only be emitted via the water bath and filters and then ducted to atmosphere.
- 5.4 Emissions from the U.V. curing of coatings shall only be emitted via ducting to atmosphere.
- 5.5 Emission from the sanding of parts shall be via a dust extraction system and vented to atmosphere via dust arrestment equipment.

PROCESS B

- 5.6 Emissions from the spraying of sealant shall be emitted via a water bath and so ducted to atmosphere.
- 5.7 Emissions from the spraying of the polyester coatings shall be emitted via a water butt and so ducted to atmosphere.
- 5.8 Emissions from the sanding of parts shall be via dust extraction and vented to atmosphere via dust arrestment equipment.

6. **GENERAL OPERATIONS**

6.1 Any mechanical malfunction or spillage of material shall be attended to and remedied as soon as possible. Any incident likely to give rise to atmospheric emissions shall be noted in detail in the process log book as described in 3.3.

- 6.2 Any incidents likely to give rise to emissions which may have an impact on neighbouring residents shall be reported immediately to this Authority.
- 6.3 A copy of this authorisation shall be displayed so it can be conveniently read by persons having duties which are or maybe affected by this authorisation.
- 6.4 The operator shall supply, to this Authority, on demand and without charge, a copy of all or part of the monitoring records kept in accordance with this authorisation.

7. UPGRADING OF THE PROCESS

7.1 No later than six months from the date of this authorisation, a programme for upgrading the process shall be submitted to this Authority. The upgrading programme shall have regard to the Secretary of State's Guidance:

Wood Coating Processes PG 6/33(92).

7.2 Any proposed methods for non-continuous emission sampling for the purposes of complying with the authorisation must be agreed in writing with this Authority.

SUPPLEMENTARY NOTES

THESE NOTES ARE NOT PART OF THE AUTHORISATION

- Your attention is drawn to your obligation under Section 7(2) of the Environmental Protection Act 1990 to ensure that the best available techniques, not entailing excessive cost (BATNEEC) for:
 - A) preventing the release of prescribed substances into the air or where that is not practicable by such means, for reducing the release into the air of such substances to the minimum and for rendering harmless any such substances that are so released

and

- B) for rendering harmless any other substances which might cause harm if released into the air.
- 2. The authority for contact purposes should be taken to mean the head of the Environmental Protection Section, Tel 831810 during office hours, 832222 outside office hours.
- 3. You will note that condition 7.1 of the authorisation requires you to submit a schedule of works for approval by this Authority, within six months of the issue date. This schedule must describe the procedures and improvements that you intend to implement in order to meet the requirements of the relevant guidance note referenced within the authorisation. From observations and inspections of the process I would recommend that the following topics are specifically included.
 - a) The results of non-continuous emission sampling of emissions from the Spraybooths to indicate what improvements (if any) are required to ensure compliance with the emission limits stated in the Process Guidance Note.
 - b) The proposed frequency of further non-continuous emission sampling, taking into account the results of the initial monitoring exercise.
 - c) The adoption of electrostatic or other spraying techniques.
 - d) The increase in height of the final discharge points from the Spraybooths and other exhausts according to the requirements of the Process Guidance Note. This should include a calculation of the proposed ground level pollutant concentration around the prescribed process.
 - e) An initial indication of the intended options for emissions of volatile organic compounds to be pursued according to Clause 19 of the Process Guidance Note.



Environmental Protection Act 1990

Application For Authorisation To Carry

Out A Prescribed Process At Unit 1

Contents

- 1. Application Form
- 2. Location Plan
- Ouline Description of Processes Process A
 Process B
 Related Information
- 4. List of materials used in the processes (Q8)
- Data sheets Relating to acrylic lacquer process
 Relating to polyester process
- 6. Description of techniques used to minimise emissions to atmosphere (Q9).
- 7. Calculation of anticipated emissions (Q10).
- 8. Response to question 15.

ENVIRONMENTAL PROTECTION ACT 1990, Part I

The Environmental Protection (Prescribed Processes and Substances) Regulations 1991 The Environmental Protection (Applications, Appeals and Registers) Regulations 1991

See Notes on pages 3 and 4 <u>before</u> completing this form.

APPLICATION FOR AUTHORISATION to carry out prescribed process under section 6 of the Environmental Protection Act 1990

Name	and address of applicant (2) (in the case of a registe	red:Company; name; number and registered
fice)	Marvic-Empe Ltd.	Reg No. 1905434
	Bodmin Road Coventry CV2 5DY	Tel.No.0203 611180
Name	e and address of premises where process is or will be car	rried on (not applicable to mobile processes)
	Unit 1 of the above premises	Tel.No.
In the	case of mobile plant, name and address of the principal	place of business:
	N/A	
		Tel.No.
Addre	ess for correspondence relating to the application	
	As above	
ontac	tname Mr M Wilson	Tel.No. as above
liet	of mans or plans enclosed with the application showi	ing the location of the premises where the
List o	of maps or plans enclosed with the application showing is or will be carried on.	
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L L Where lescrit	TITLE Cocation Plan Scale 1: 2500 Cayout Plan Unit 1 The process is or will be carried on on only part of the be which part of the premises and list the plan(s) which is	premises whose address is given at 2 abovidentif(y)(ies) this part or these parts.

			•		
7When was the plant first installed? 1986				•	
Please also give the details and dates of any major	r modifications	or improv	ements v	vhich have	been carri
out. •	•				
None			:		
	. •			-	24773244
					•
B-List the prescribed substances (and any other with or which might be released into the air result					n connecti
See enclosed list of material	ls_used in	the pr	ocess	e de la companya de La companya de la co	
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See attached sheet					
				· · · · ·	
10. Give details of the source, nature and amoun process. (use a continuation sheet if necessary)	nt of current ar	d/or antic	pated én	nissions. to	air from (
See attached sheet					
11 Give the assessment of the likely environ continuation sheet if necessary)	mental conse	quences o	f the en	nissions t	o air. (us
continuation sheet if necessary)					o air. (us
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12 What monitoring is or will be carried out of emissions to air?

Currently as the usage of solvents is below the prescribed limit, no monitoring is carried out. If/when the situation changes a monitoring regime will be submitted to the Local Authority for approval

13 What mo	onitoring will be carried out of the environmental consequences of emissions to air?
As	Question 12
14 How will	you monitor the techniques described in the answer to question 9?
As	Question 12
15 State ho 1990 will be	w you will ensure that the objectives listed in section 7(2) of the Environmental Protection Act achieved and how the condition implied by section 7(4) of the Act will be complied with.(6)
See	attached response
16 If you h details. (use	ave any proposals for improvements which might prevent or reduce emissions, please give a continuation sheet if necessary)
Not	necessary at present
17 Give an authority in	by other additional information which you would like to be taken into account by the local considering your application.
N/A	
Department available fro PROCESS G	dance on the best available techniques not entailing excessive cost is published by the of the Environment in the process guidance notes for specific industries, copies of which are mean HMSO or can be ordered from certain bookshops. YOU ARE ADVISED TO CONSULT THE GUIDANCE NOTE FOR YOUR INDUSTRY BEFORE COMPLETING THIS FORM. YOU MIGHT ALSO SEFUL TO READ THE GENERAL GUIDANCE NOTE GG3.(7)
If you requi	ire any further information or assistance in completing this form, please contact your local he address shown below.

Please complete the final section of this form on page 4 overleaf.

I enclose the fee of £ 900 - (8). Cheques should be made payable to:

I HEREBY	CERTIFY	that all the	information	contained in this ad to sign on beha	application	is correct	to the	best	of r	my
knowledge	and belie	ef land That/	am authorise	ed to sign on beha	If of the Com	oany].				

Signature			• • • • • • • • • • • • • • • • • • • •
_	DIRECTOR		
Official title	· · · · · · · · · · · · · · · · · · ·		
Date &	1st September 19	92	

Please complete and return this form together with FOUR copies of each of the plans listed in the reply to question 5 and the required fee to:

Tel.No.

NOTES

- 1 This is the local authority in whose area the prescribed process will be carried on, or in the case of mobile plant, the local authority in whose area the applicant has his principal place of business.
- 2 Please state the person/Company who is operating or will operate the process, **not** an agent who may be completing the application on the operator's behalf.
- 3 A list of prescribed processes for local authority control is given in Appendix A, which accompanies this form. Further advice can be obtained if necessary from the local authority.
- 4 A list of prescribed substances for release into the air is given in **Appendix B**, which accompanies this form. "Harm" includes offence to the senses or harm to property.
- 5 Please list fully all pollution control measures for all stages of the process, from the receipt of raw materials to the despatch of wastes and finished products, including, for example, the height and location of any stacks or vents; the abatement technology; process control and operational data; arrangements for maintenance; the extent of supervision; the relevant qualifications and experience of the workforce; staff training; and contingency plans for breakdowns and emergencies.

All calculations should be shown, particularly for the chimney height(s). Justification for the selection of a particular abatement option should be given.

- 6 Section 7(2) and 7(4) of the Environmental Protection Act 1990 requires every operator of a prescribed process to use the best available techniques not entailing excessive cost for -
 - (i) preventing the release of prescribed substances, or where that is not practicable, for reducing the release of such substances to a minimum and rendering them harmless; and
 - (ii) rendering harmless any other substances which might be released.
- Much of the information contained in the application form will be included in a register which the local authority is required to keep for public examination in accordance with section 20 of the Environmental Protection Act 1990 and the Environmental Protection (Applications, Appeals and Registers) Regulations 1991. Sections 21 and 22 provide for certain information (affecting national security, or commercial confidentiality) to be excluded from the register. Such information should be clearly identified in this application form.
- £800 in the case of initial applications.
 £530 in the case of applications for a substantial change.
 £530 in the case of processes transferred from previous HMIP control.
 £100 for small waste oil burners.

MARVIC-EMPE LTD SITE LOCATION PLAN SCALE 1:2500 WEST MIDLANDS COUNTY 600 MARVIC EMPE WW 17: 2 WITH EUR MARVIC GMAF Percetion Ground

Unit 1

Process A - Outline Description of Process Using High Gloss U.V. Acrylic Lacquer

- 1. Receipt of sanded parts from unit 2.
- 4. The property of the modern april . Sealing of parts by hand-wiping application of sealer 2. and spray application of blotter for edges.
- Repair of parts with filler, sanding and reseal by 3. hand.
- Spray parts with acrylic gloss (1st coat), using culton co 4. Lostin-Colon automatic sprayline. Curing by U.V.
- Sand (Flat) parts by hand and by autosander. 5.
- 6. Apply fixings to rear of parts.
- Repair any faults with paint (touching-in). 7.
- Spray parts with acrylic gloss (2nd coat). Curing by U.V 8.
- 9. De-nibbing (sanding localised imperfections).
- 10. Polishing.
- 11. Packing and dispatch to customer.

Process B - Outline Description of Process Using High Gloss Polyester

This process is not currently in production but the process description is included to permit future flexibility in manufacturing planning.

- Receipt of bleached parts. 1.
- 2. Staining of parts.
- 3. Sealing of parts.
- 4. Repair of any faults with paint (touching-in).
- Spraying of parts with polyester. Four coats 'wet on wet' 5. followed by air curing.
- Sanding of parts (flatting) by hand and belt sanders. 6.
- Polishing of parts by column polishers. 7.
- 8. Inspection and packing.

Related Information

The application is for an existing process (Process A) as defined by the Regulations in that it is carried out currently in premises/plant and has been carried out for approximately 6 years.

Process B is an 'existing process' as defined by the Regulations in that although it is not in full production at present, a number of low volume trials have been carried out and it is to be carried out in the premises and using the plant which have been in existence on site for over 6 years.

Process A is at a level which falls below the limits prescribed and as such it is not necessary to make an application. However in order to maintain future flexibility for both process A and B we wish to seek authorisation as a prescribed process.

1. Materials

Lacquers used in the process are stored in locked outdoor steel cabinets in accordance with the HSE publication 'The Storage of Flammable Liquids in Containers'. Up to 100 litres may be stored inside the premises in similar steel cabinets for day-to-day usage.

2. Waste Materials

Overspray from lacquer and bleach application is collected in the water bath associated with the spraybooths. In the case of lacquer it is collected using a foaming agent.

The waste is removed and stored in sealed containers pending removal by an approved waste contractor under the requirements of S17 of the Control of Pollution Act.

Maintenance of Plant

Regular maintenance and housekeeping is carried out in accordance with manufacturers recommendations.

4. Supervision/Operator Skills

All operators are fully experienced and trained in their particular work activity. Each section is supervised by a team leader to ensure compliance with in-house procedures and work practices.

5. Manufacturing Method

The manufacturing method is a batch process co-ordinated to meet delivery schedules supplied by our customers.

List of Materials used in the Process

- Response to Question 8

Process A

1.	Brown Blotter	Ref. 6412
2.	Polyurethane Basecoat	54.044.3645
3.	Polyurethane Curing Agent	54.043.3460
4.	Dual Thinners	65.002.2222
5.	U.V. Acrylic Lacquer	82.090.7750
6.	Cleaning Solvent	Ref. 582
7.	Walnut stain for touching-in	Ref. 1789

Safety Data Sheets enclosed

Process B

1.	UPE Filler	10.802.0.8011
2.	Hardener	58.302.0.0000
3.	Stain	L 6801297
4.	Puridur Sealer	30513.0.0000
5.	Puridur Sealer	38020.0.0000
6.	UPE Lacquer	52 034.0.0000
7.	UPE Accelerator	59 045.0.0000
8.	UPE Ventilation	59 022.0.0000
9.	UPE Thinners	59 999.0.0000
10	. UPE Hardener	58.012.0.0000

Safety Data Sheets enclosed

Response To Question 9

The parts are sealed using a polyurethane basecoat and curing agent mix. This is carried out by hand-wiping (fadding) to prevent the airborne release of particles. Ventilation is provided by a ducted extraction system.

The high gloss acrylic lacquer is sprayed using a purposebuilt automatic sprayline (manufactured by Charvo Ltd.). It consists of a variable speed conveyor, two pairs of automatic spray guns (only one pair used at a time) with a water-curtain bath beneath the conveyor to collect the overspray.

The overspray impacts in the water bath and air is forced through the water curtain. Baffles remove water droplets and filters remove particles before the cleaned air passes through the centrifugal fan and discharged to atmosphere. The cleaned air discharges through a 400mm square duct extending to approximately ridge height. The extraction rate is 115 m3/min.

The parts are cured under U.V. lights. Emissions from the curing process are discharged by two 175 mm diameter ducts. These two ducts extend to approximately ridge height.

The application of blotter (edge sealer) is carried out by spraying, using a waterwash spraybooth. This is a pumped system which draws water from the reservoir tank to create a water curtain at the rear of the booth. The extraction rate is 115 m3/min and the chimney is 600mm diameter extending to just below ridge height. The plant is maintained at a slight negative pressure to ensure that there are no fugitive emissions at low level; all emissions are from the chimneys/ducts at high level.

The above systems are considered to be the most effective available to minimise emissions from the process.

Response To Question 10

The current level of solvent usage is less than the prescribed limit of 5 tonnes per year. It is not therefore necessary to calculate the level of emissions. However an estimate of emissions has been calculated and is enclosed with this application.

If the quantity or type of substances used in the process change significantly further details will be forwarded to the Local Authority.

The enclosed drawing shows the position of emission points.

The estimates of maximum and 15 minute mean atmospheric emissions are calculated as follows.

The calculations are based on the following formulae:

Emissions of solids (mg/m3)

Emission of solvents (mg/m3)

= Flow rate x solvent content x SG x 10

Extraction Rate

1. Blotter

= 12.5 1/wkUsage $= 0.1 \, l/min$ Max flow rate when spraying

Mean 15mm flow rate = 0.08 1/15 min

SG 1.1 Solid content : Solvent content : 33% 67ቄ 5ቄ SG 0.9

Spraybooth loss:

Extraction rate: 115 m3/min

Solid emissions = $0.1 \times 0.33 \times 0.35 \times 0.05 \times 1.1 \times 10$ (max) 115

5.5 mg/m3

15 Min Mean $0.08 \times 0.33 \times 0.35 \times 0.05 \times 1.1 \times 10$ = 115 x 15

0.29 mg/m3

Solvent emission = $0.1 \times 0.67 \times 0.9 \times 10$ (max) 115

524 mg/m3

15 Min Mean $0.08 \times 0.67 \times 0.9 \times 10$ = 115 x 15

28 mg/m3

2. <u>U.V. Acrylic Lacquer</u>

Usage = 2001/wk
Max flow rate when spraying = 0.2 1/min
Mean 15 min flow rate = 1.25 1/15min

Solid content : 93.1% SG 1.1 Solvent content : 6.9% SG 0.9

Extraction rate : 115 m3/min

Booth losses : 10% Overspray : 50%

Solid emissions = 0.2 x 0.931 x 0.5 x 0.1 x 1.1 x 10 (max)

= 89 mg/m3

= 37 mg/m3

Solvent emissions = 0.2 x 0.069 x 0.9 x 10 (max) 115

= 108 mg/m3

 $= \underline{45 \text{ mg/m3}}$

Response To Question 15

We will have continued liaison with manufacturers of lacquer to ensure that efforts are made to develop products that will meet the requirements of the Environmental Protection Act 1990. In addition we will continue to use equipment and plant that minimises emissions to atmosphere but not entailing excessive cost.

Our products have to meet stringent specifications laid down by the automotive manufacturers. These requirements can only be met by solvent-based lacquering systems at the present time. In many cases our customers specify the actual material to be used to meet their requirements.

MARVIC-EMPE LTD SITE LOCATION PLAN Plin O SCALE 1:2500 WEST MIDLANDS COUNTY must 3 MARNIC EMPE น์พาระ 2 Moteric-Eyes WIT4 MARVIC-GHAZ Pacrastian Ground