

PERMIT REFERENCE: PPC 095
RAC AUTOMOTIVE SOLUTIONS

Pollution Prevention and Control Act 1999
Pollution Prevention and Control (England and Wales)
Regulations 2000 as amended

Process Address	RAC Automotive Solutions Stonebridge Trading Estate Rowley Drive Coventry CV3 4FG
Process Type	Respraying of Road vehicles
Current Operator	RAC Motoring Services 1 Forest road Feltham Middlesex TW13 7RR
Previous Operator	Midland Car Refurbishers Ltd Address same as above
Date of Application	1 st April 2004
Date Permit Issued	24 th March 2005

**POLLUTION PREVENTION & CONTROL (ENGLAND AND WALES)
REGULATIONS 2000**

DOCUMENT A : PERMIT

RAC Automotive Solutions

Reference Number **PPC/095**.

Coventry City Council ("the Council") in accordance with Section 10(2) of the Pollution Prevention & Control (England and Wales) Regulations 2000 ("The Regulations"), hereby permits:

RAC Automotive Solutions

Whose registered office is:

**RAC Motoring Services
1 Forest Road
Feltham
Middlesex
TW13 7RR
Registered in England No: 1437767**

to operate a Part B installation involving a coating activity, as prescribed in Section 6.4 Part B of Schedule 1 to The Regulations, at:

**RAC Automotive Solutions
Stonebridge Trading Estate
Rowley Drive
Coventry
CV3 4FG**

The permit is subject to the conditions specified in this document consisting of 12 pages and comprising documents A, B and C, plans PPC/095/A, PPC/095/B, PPC/095/C and Appendix 1.

Signed..........

Alan Bennett, Head of Environmental Health
A person authorised to sign on behalf of the Council

Dated24 March 2005.....

SCOPE

The installation comprises not just any relevant unit carrying out a Part B activity listed in Schedule 1 to the Regulations, but also directly associated activities which have a technical connection with that activity and which could have an effect on pollution.

All pollutant concentrations shall be expressed at reference conditions of 273K and 101.3kPa, without correction for water vapour content.

Technical Guidance documents used in the preparation of this document:

- Secretary of States Guidance Note PG6/34(04) – Respraying of Road Vehicles
- Secretary of State’s Guidance – General Guidance Manual on Policy and Procedures for A2 and B installations. ISBN 0-85521-028-1

Date Annual Fee Required: 1st April of each financial year

Date For Full Compliance: Date permit issued

Permit Prepared By: Ayeisha Mann
Permit Checked By: Rachel King

LEGISLATION

1. Pollution Prevention and Control Act 1999.
2. Pollution Prevention and Control Regulations 2000 as amended, schedule 1 as amended

BRIEF DESCRIPTION OF THE INSTALLATION REGULATED BY THIS PERMIT

Definitions referred to in this permit

- An **Activity** is an industrial activity forming part of an installation. Different types of activity are listed within Schedule 1 of the PPC Regulations and are broadly broken down into industrial sectors. Other “associated” activities may also form part of an installation.
- An **Installation** comprises not just any relevant unit carrying out a B activity listed within Schedule 1 to the PPC Regulations, but also directly associated activities which have a technical connection with a schedule 1 activity and which could have an effect on pollution.
- An **Operator** is the person (eg a company or individual) who has control over the operation of an installation.
- **Volatile organic compound (VOC)** shall mean any organic compound having at 293K a vapour pressure of 0.01 kPa or more, or having a corresponding volatility under the particular conditions of use.
- **Organic solvent** shall mean any VOC which is used alone or in combination with other agents, and without undergoing a chemical change, to dissolve raw materials, products or waste materials, or is used as a cleaning agent to dissolve contaminants, or as a dissolver, or as a dispersion medium, or as a viscosity adjuster, or as a surface tension adjuster, or a plasticiser, or as a preservative.
- **Stack** includes structures and openings of any kind from or through which substances may be emitted to air.
- **Duct** includes enclosed structures through which gaseous substances may be conveyed.
- **Process vent** includes open terminations of ducts.
- **Authorised Officer** shall mean an officer authorised to carry out duties under the Pollution Prevention and Control Act 1999 and subordinate regulations
- **Logbook** shall mean any electronic or paper means of storage of the required information as agreed by the regulator
- **Local Authority** shall mean Coventry City Council
- "m" means metre
- "m/s" means metres per second

The general location of the Permitted Process is shown on the attached plan PPC/095/A. The Installation boundary is marked in red on the attached plan PPC/095/B. The internal layout of the paint shop is shown on the attached plan PPC/095/C.

Description of Installation

The installation involves the delivery and storage of paints, diluents and cleaning solvents to the paint store indicated on the attached plan referenced PPC/095/C. The paints are subsequently mixed on the Stadox mixing machine using self sealing pouring facilities.

Vehicles to be resprayed are subject dry sanding employing air operated sanding machines coupled to two Betex dust collection units.

The vehicles are then subjected to the application of primers and curing of vehicles in one of the Dalby 10k spraybooths indicated as spraybooth F on plan PPC/067/C. The vehicles are subject to the spraying of top coats and the curing of vehicles in three Dalby 12K combination spraybooths indicated as spraybooths A, B and C and one of the Dalby 10K spraybooths indicated as the 'Fast Track' spraybooth E on the attached plan referenced plan PPC/095/C. Spraying is undertaken using De Vilbiss HVLP guns. Also wax underseal and panel sealants are applied by brush or injections methods.

Table 1
List of Process Areas within the Installation and Associated Emission Points, Pollutants of Concern and Abatement Plant Required

Row Number	Area/Machinery Identification	Pollutants Emitted	Emission Limit in Permit	Abatement Plant Required
1	Dalby 12K combination spraybooth marked as A on Plan PPC/095/C	Particulates, VOC	Particulates – see Clause 1.3 VOC– see Clause 1.4	Dry Filtration
2	Dalby 12K combination spraybooth marked as B on Plan PPC/095/C	Particulates, VOC	Particulates – see Clause 1.3 VOC– see Clause 1.4	Dry Filtration
3	Dalby 12K combination spraybooth marked as C on Plan PPC/095/C	Particulates, VOC	Particulates – see Clause 1.3 VOC– see Clause 1.4	Dry Filtration
4	Dalby 10K combination spraybooth marked as E on Plan PPC/095/C	Particulates, VOC	Particulates – see Clause 1.3 VOC– see Clause 1.4	Dry Filtration
5	Dalby 10K combination spraybooth marked as F on Plan PPC/095/C	Particulates, VOC	Particulates – see Clause 1.3 VOC– see Clause 1.4	Dry Filtration
6	Betex Dust Extracton System	Particulates	See Clause 1.8	Bag collection system- not extracted to atmosphere

DOCUMENT B

CONDITIONS

All conditions shall have immediate effect unless stated otherwise.

1.0 EMISSION LIMITS AND CONTROLS

- 1.1. All emissions to air shall be free from offensive odour outside the installation boundary, as perceived by the Local Authority Inspector.
- 1.2. There shall be no visible emissions of particulate matter noticeable from the process when it is viewed from beyond the process boundary.
- 1.3. The concentration of total particulate matter in the final discharge to air from each of the five Dalby spraybooths shall not exceed 10mg/m³.
- 1.4. All paints, diluents and cleaning solvents used in the process shall comply with the organic solvent specification as detailed in table 5 of the Secretary of States Guidance Note 6/34(04).
- 1.5. Coatings shall be applied using High Volume Low Pressure spray guns.
- 1.6. The pressure gauge, audible alarm and booth extract shutdown systems installed on the ovens shall all be in good working order and in operation at all times when the booths are in use.
- 1.7. The introduction of dilution air to achieve the emission concentration limits in this permit is not permitted. Exhaust flow rates should be consistent with the efficient capture of emissions.
- 1.8. Dry sanding and welding of vehicles shall only be carried out when resulting fumes and dust are controlled using the local extract ventilation equipment. Arisings of particulate matter from sanding activities shall be collected in the bag filtration system and not extracted directly to atmosphere.

2.0 MONITORING, SAMPLING AND MEASUREMENT OF EMISSIONS

- 2.1 A detailed record shall be kept of all organic solvents used in the prescribed processes including cleaning solvents, diluent solvents and solvents contained within coatings themselves. The record shall include
 - a. The name of each product and its use in accordance with the Secretary of States' Guidance Note PG6/34(04) Respraying of Road Vehicles e.g. Gunwash, Top coat (2 coat).
 - b. The amount of solvent in each product in grams per litre of product as applied.
 - c. The total amount of product used in the previous 12 months period.
 - d. The total amount of solvent used in the process in the previous 12 month period, to include all products containing organic solvents.

This record shall be submitted to this Local Authority once in every 12 months period.

- 2.2 A manufacturer's certificate of guarantee with suitable test data has been submitted and approved by this Local Authority. Maintenance service inspections for the Dalby spraybooths shall take place every three months. The service inspection shall include the testing of the pressure gauge; audible alarm and booth extract shutdown systems installed on the ovens. Service records shall include date of service, faults identified and corrective maintenance action taken. These records shall be kept for a minimum of 3 years.
- 2.3 In the absence of records of regular maintenance required by clause 2.2 of the Dalby spraybooths, the operator shall carry out monitoring of emissions from the Dalby spraybooths on a yearly basis to demonstrate compliance with clause 1.3. In addition, the testing of the pressure gauge; audible alarm and booth extract shutdown systems installed on the ovens shall be tested every 3 months.
- 2.4 The Local Authority shall be notified at least 14 days in advance of any periodic monitoring to determine compliance with Clause 1.3. This notification shall include the provisional time and date of monitoring, the Pollutants to be tested and methods to be used.
- 2.5 Periodic monitoring in to demonstrate compliance with the permits stack emission limit shall not take place without prior approval from this Local Authority.
- 2.6 The results of periodic emissions testing shall be forwarded to the Local Authority within 8 weeks of completion of the monitoring.

3.0 OPERATIONAL CONTROLS

- 3.1 The cleaning of spray guns and other equipment shall only be carried out in the gun wash machine in the gun clean area and paint mixing room as shown on the plan referenced PPC/095/C.
- 3.2 The mixing of paint shall only be carried out in the paint mixing room as shown on the plan referenced PPC/095/C. This shall only be done while the extractor fan is in operation.
- 3.3 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. Sprayout shall be collected into a separate receptacle for later disposal, and not sprayed directly into the booth.
- 3.4 All full and partially full containers which hold materials containing organic solvents shall be lidded, whilst not in use. All paints that are partially full must be stored on the Standocryl paint mixing rack.
- 3.5 Solvent soaked wiping cloths or brushes shall be stored in lidded containers or sealed bags whilst awaiting disposal.
- 3.6 Spraying operations shall only be carried out in the spraybooths which shall be in proper working order.
- 3.7 All arising of dry, dusty materials must be securely bagged and stored within closed bins or skips before removal from the site.

4.0 STACKS, DUCTS AND PROCESS VENTS

- 4.1 Emissions from the spraying or curing of coatings in the five spraybooths shall only be emitted to atmosphere via the two stage dry arrestment filters.
- 4.2 The termination points of the stacks serving the spraybooths shall be 3 metres above the roof ridge height of the process premises and shall achieve an efflux velocity of 15m/s.
- 4.3 The discharge stacks serving the five spraybooths shall not be fitted with any restriction, plate, cap or cowl at the final opening.
- 4.4 Emissions from local extraction ventilation system must only be ducted via the Betex dust collection units to be returned into the workshop.

5.0 GENERAL OPERATIONS

- 5.1 The operator shall undertake regular cleaning and preventative maintenance including inspection and repair/replacement on all plant and equipment concerned with the emission, capture, transport and control of emissions to atmosphere. Where necessary manufacturers guidelines shall be used to determine the regularity of maintenance. Records of preventative maintenance including inspections and any works undertaken shall be kept on site and made available to the local authority inspector on request.
- 5.2 Spares and consumables for plant and equipment used in the installation in particular that subject to continual use or wear shall be held on site or shall be available at short notice. Such plant or equipment shall not be used unless that plant or equipment is capable of working in accordance with the conditions of this permit.
- 5.3 Staff at all levels shall receive the necessary training and instruction in their duties relating to control of the activities and emissions to air. Records shall be kept which details all relevant training provided to staff, and these records shall be kept for a minimum of 2 years.
- 5.4 Any malfunction of plant or spillage of solvent based materials shall be remedied as soon as possible and process operations altered whilst the necessary work is undertaken.
- 5.5 Any incident likely to give rise to adverse atmospheric emissions or emissions that may have an impact on the local community shall be notified to the local authority immediately, and the details of incident including remedial action taken recorded in the process log book.
- 5.6 The operator shall make available on demand and without charge any of the records required to be kept by this permit.
- 5.7 If there is any intention to change any aspect of the prescribed installation from the description contained in the beginning of this permit, or any other aspect which may affect the substances or concentration or amount of substances being emitted to atmosphere, the operator shall notify the regulator of the proposed changes at least 4 weeks in advance before the changes take place.

6.0 Solvent Emissions Regulations

- 6.1 The operator shall identify products or materials that are/contain risk phrased substances/materials R40, R45, R46, R49, R60 and R61 and formulate and

implement a timetable to replace, control and limit designated risk phrase materials as soon as possible, as defined and agreed by the Local Authority.

6.2 Compliance for general VOC emissions shall be demonstrated by one of the following methods

1. The use of a solvent reduction scheme to demonstrate the achievement of a target emission. The emission targets are as follows:

Target emission all existing installations by 31/10/05	Target emissions all existing installations from 31/10/07
All new installations until 31/10/04	And target emission all new installations from 31/10/04
Total mass of solids x1.8	Total mass of solids x1.2
To be met using compliance coatings and controlled and monitored use of gunwash and thinners	

Or

2. By meeting emission and fugitive limits by 31 October 2007 as follows: -

Emission limits /provision	Type of monitoring
50mg/Nm ³ as	Annual manual extractive testing
2 minute mean for spraying operations	
15 minute mean for baking operation	

The above emission limit values do not apply where compliant coatings are used. Compliant coatings are listed within Table 5 of Secretary of States Guidance for Respraying of Road Vehicles, Process Guidance Note 6/34(04).

The Solvent Emissions Directive (SED) applies to this process however, following the introduction of AQ14 (04) by DEFRA, demonstrating that you use compliant coatings is sufficient to meet the requirements of SED, until this Local Authority is advised otherwise by DEFRA.

DOCUMENT C

RESIDUAL DUTY

In relation to any aspect of the process not regulated by specific conditions in this permit, then Best Available Techniques shall be used:

For the purposes of the Pollution Prevention and Control (England and Wales) Regulations 2000, “best available techniques” means the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing in principle the basis for emission limit values designed to prevent and, where practicable, generally to reduce emissions and the impact on the environment as a whole; and for the purpose of this definition –

- a) “available techniques” means those techniques which have been developed on a scale which allows implementation in the relevant industrial sector, in the economically and technically viable conditions, taking into consideration the cost and advantages, whether or not the techniques are used or produced inside the United Kingdom, as long as they are reasonably accessible to the operator;
- b) “best” means, in relation to techniques, the most effective in achieving a high general level of protection of the environment as a whole;
- c) “techniques” includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

SUPPLEMENTARY NOTES

These notes do not comprise part of the Permit PPC/095 but contain guidance relevant to the Permit.

Inspections and Powers of Entry

Regular inspections will be carried out by officers of the Council (the Local Authority Inspectors) to check and ensure full compliance with the Permit conditions and residual duties. These inspections may be carried out without prior notice.

Under section 108(6) of the Environment Act 1995 authorised Local Authority Inspectors have been granted powers of entry into any premises for the purposes of discharging relevant duties.

Reviews

The Local Authority has a statutory duty to review the permit at least once every 6 years or in the following circumstances set out in regulation 15 of the Pollution Prevention and Control regulations 2000:

- a) The pollution from the installation is of such significance that the existing emission limit values for the permit need to be revised or new emission limit values need to be included in the permit
- b) Substantial changes in BAT make it possible to reduce emissions from the installation or mobile plant significantly without imposing excessive costs; or
- c) Operational safety of the activities carried out in the installation or mobile plant requires other techniques to be used

Health and Safety

This Permit is given in relation to the requirements of the Pollution Prevention and Control (England and Wales) Regulations 2000. It must not be taken to replace any workplace responsibilities the operator has under Health & Safety legislation. Whenever emission limits quoted in this Permit conflict with occupational exposure limits set under the Health and Safety at Work Act 1974 to secure the health, safety or welfare of persons at work, the tighter limit should prevail.

Installation must be operated in order to protect persons at work as well as the environment. In achieving conditions in this Permit the operator must not adopt any course of action that would put at risk the health, safety or welfare of persons at work.

Other Statutory Requirements

This Permit does not detract from any other statutory requirement, such as the need to obtain planning permission, hazardous substances consent, discharge consent from the Environment Agency, building regulations approval, or a waste disposal licence.

This Permit does not authorise a contravention of any other enactment or any order made, granted or issued under any enactment, nor does it authorise a contravention of any rule or breach of any agreement.

The Operator is advised to consult the relevant Planning Department regarding changes that may be required as a result of this Permit (e.g. stack heights) as they may require planning permission.

Transfer of Permits

Where the operator of an installation wishes to transfer, in whole or in part, his permit to another person, the operator and the proposed transferee shall jointly make an application to the regulator to effect the transfer. Such an application shall be accompanied by the permit and any fee prescribed in respect of the transfer.

In the case of partial transfer, where the original operator retains part of the permit, the application must make clear who will retain control over the various parts of the installation. The application must include a plan identifying which parts of the site and which activities the operator proposes transferring.

The local authority will then determine whether to allow the transfer within a two-month period, unless the local authority and the applicants agree a longer period. Where the local authority approves the transfer, the transfer will take effect from the date requested by the operator or a date that may be agreed by the local authority and the applicants.

Variation to Permits

Variation to permits may be initiated either by the local authority or the operator, either in response to changes in the operation of an installation or if new conditions are needed to deal with new matters. Variations may be required in response to the following.

- Change of operation of the installation. (The operator shall notify the local authority under Section 16(1) of the Regulations.)
- In response to the findings of a periodic review of conditions.
- In response to the findings of an inspection.
- New or revised sector guidance notes

The operator should apply to the Local Authority in order to vary a permit under regulation 17 of the Regulations. The application must be in writing and, in accordance with Part 1 of Schedule 7 to the Regulations contain:

- The name, address and telephone number of the operator.
- The address of the installation.
- A correspondence address.
- A description of the proposed changes.
- An indication of the variations the operator would like to make.
- Any other information the operator wants the authority take account of.

Substantial Change

A substantial change means, in relation to an installation, a change in operation, which in the opinion of the local authority may have significant negative effects on human beings or the environment.

Where the local authority deems that a proposed variation constitutes a substantial change, the operator will be informed of the process to follow.

Noise

This Permit does not include reference to noise. Statutory noise nuisance is regulated separately under the provisions of Part III of the 1990 Act.

Appeals

An Appeal can be made against the conditions in, or variations to this Permit as per Part IV of the Regulations. Appeals are made to the Planning Inspectorate who acts on behalf of the Secretary of State. Appeals against conditions within a Permit must be submitted within 6 months of the date of issue of the permit. Appeals against variation notices must be submitted within 2 months of the date of issue of the notice.

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

The Planning Inspectorate
Environmental Appeals Administration
Room 4/19 – Eagle Wing
Temple Quay House
2 The Square
Temple Quay
BRISTOL
BS1 6PN

HMSO Publications

All HMSO publications can be ordered by telephone on Tel: 0870 600 5522,
Fax: 0870 600 5533 or e-mail: book.orders@tso.co.uk

Emission Monitoring Protocol

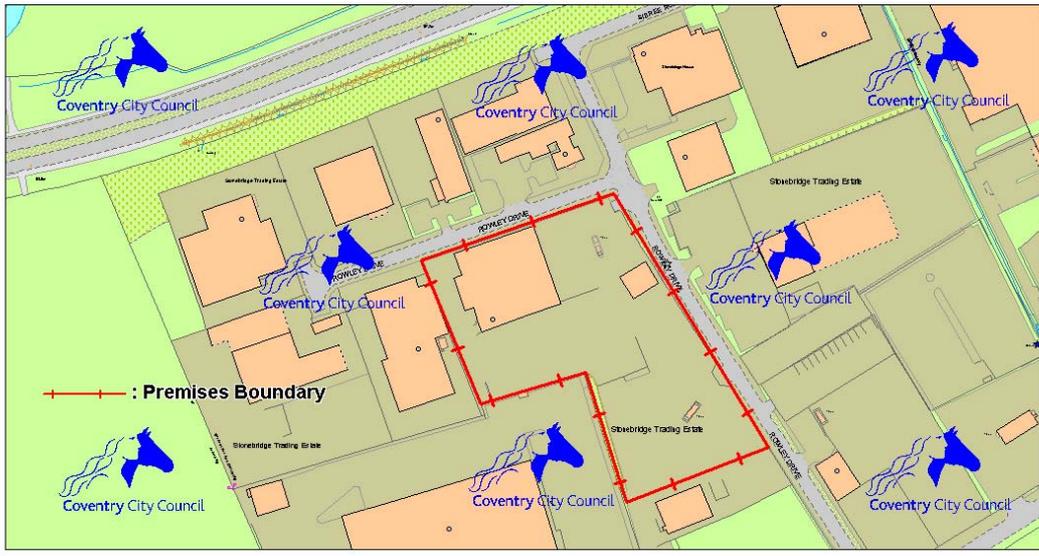
The documented procedure by which reliable and comparable results are obtained from measurements at source is known as a Protocol.

Protocols ensure that the sampling procedures are carried out correctly and that the results obtained accurately characterise the process.

The main components of a Protocol are as follows:-

1. Calibre and quality of the sampling team.
2. A reference measurement method (standard methods may not always be available)
3. A standard methodology setting out:
 - health and safety considerations
 - pollutants of interest
 - plant operating conditions required
 - selection and location of sampling position
 - sampling characteristics (e.g. isokinetic etc) and techniques
 - sampling frequency
 - sampling duration
 - number of samples
 - type (including make and model), condition and suitability of sampling equipment
 - required accuracy
 - variability of emissions
 - analytical methods including laboratory competence and NAMAS accreditation certificate copy for each pollutant of interest
 - analytical precision
 - procedures to be adopted if standard methods unavailable
 - calibration certificate(s) for sampling equipment
 - Quality Control and Quality Assurance procedures
 - Presentation of results and associated information.

Plan PPC/095/A Premises Boundary of RAC Automotive Solutions



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