

PERMIT REFERENCE: PPC 108

Sytner Holdings Ltd, t/a Guy Salmon Landrover

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

Process Address	Birmingham Road Coventry CV5 9GY
Process Type	Respraying of Road Vehicles
Current Operator	Sytner Holdings Ltd t/a Guy Salmon Landrover Woodcote House Harcourt Way Meridian Business Park Leicester
Previous Operator	n/a
Date of Application	1 st April 2004
Date Permit Issued	11 th March 2005

**POLLUTION PREVENTION & CONTROL ACT 1999
POLLUTION PREVENTION & CONTROL (ENGLAND AND WALES)
REGULATIONS 2000**

DOCUMENT A : PERMIT

Guy Salmon Land Rover

Reference Number **PPC/108**

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:

Guy Salmon Landrover

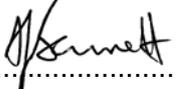
Whose registered office is:

**Sytner Holdings Ltd.
Woodcote House
Harcourt Way
Meridian Buisness Park
Leicester
Registered in England No. 2681878**

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:

**Sytner Holdings Ltd.
T/A Guy Salmon Land Rover
Birmingham Road
Coventry
CV5 9GY**

The permit is subject to the conditions specified in this document consisting of 13 pages and comprising documents A, B and C, plans PPC/108/A, PPC/108/B and Appendix 1.

Signed.....

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

Dated11 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 PG 6/34(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: John Southall

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/108/A in addition to the installation boundary that is marked by a red-hatched line. The internal layout of the paint shop is shown on the attached plan PPC/ 108/B.

Description of Installation

- the delivery and storage of paints, diluents and cleaning solvents used for the preparation and spraying of motor vehicles.
- the dry sanding of body panels using orbital sanding systems and associated local ventilation.
- the mixing of paints within the paint mixing room.
- the spray painting of car body panels and subsequent oven curing of vehicles in 2 combination spray and bake booths.
- The application of wax underseal and panel sealants by brush or injection 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	2 combination Spray and bake booths	Particulates VOC's	1.2,1.3	Dry filters
2	C-Air Dust Extraction System	Particulates	3.2	No extract 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 atmosphere from stacks S1, S2, S3, S4, S5, S6, and S7 as shown on plan numbered PPC/108/B shall be free from persistent fume, mist and droplets, other than steam or condensed water vapour.
- 1.2 Emissions from the gas burners serving the booths shall be free from visible smoke during normal operation, except during the first minute of start up when emissions shall not exceed the equivalent of Ringelmann shade 1 as described in British Standards BS2742:1969.
- 1.3 The emission concentration of particulate matter from stacks S1 and S2 as shown on plan numbered PPC/108/B shall not exceed 10mg/m³.
- 1.4 The introduction of dilution air to achieve the emission concentration limits specified in Clause 1.3 is not permitted.
- 1.5 The spray application of all coatings shall be carried out using gravity fed high volume low-pressure spray guns.
- 1.6 The spray booths shall be fitted with a pressure gauge, audible alarm and automatic shutdown system that shall operate in the event of booth over pressure. In the event of booth shutdown spraying or curing operations shall not commence until the cause of the shut down has been identified and rectified. Any remedial action taken shall be recorded in the activity logbook.
- 1.7 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 State's Guidance Note 6/34(04).
- 1.8 The cleaning of spray guns and other equipment shall only be carried out in the fully enclosed gun wash machine.
- 1.9 The testing of any spray guns following cleaning shall only be carried out in the spray booths whilst the extraction system is in operation and in proper working order. Spray-out shall be collected into a separate receptacle for disposal and not sprayed directly into the booth.
- 1.10 The spraying of paint shall only be carried out in the spray booths and whilst the extraction system is in operation.
- 1.11 All full and partially full containers that hold or have held materials consisting of organic solvents shall be lidded whilst not in use and must be stored in the paint mixing area.
- 1.12 Dry particulate filters in the spray booths and the dust collection bags in the C-Air dust extraction system shall be changed on a regular basis according to manufacturers instructions. Any such changes made shall be recorded in the process log book and where appropriate service records provided by the service contractor.

- 1.13 Used dry filters shall be stored in an enclosed container or sealed bags whilst awaiting disposal. Dust collection bags shall be securely sealed whilst awaiting disposal.

2.0 MONITORING, SAMPLING AND MEASUREMENT OF EMISSIONS

- 2.1 The spray booths shall be serviced on a six monthly basis. Service records shall detail the booth serviced, any faults noted or repairs completed, and include the testing of the pressure gauge, audible alarm and booth extract shutdown system. Service records shall be retained on site for a minimum of two years and be made available to the Local Authority on request.
- 2.2 In the absence of the servicing required by Clause 2.1, emissions of particulate matter from stacks S1 and S2 shall be tested every twelve months to demonstrate compliance with Clause 1.3
- 2.3 At least 7 days in advance of any monitoring to demonstrate compliance with Clause 1.3 this local Authority shall be notified in writing of the provisional date and time of the monitoring along with the pollutants to be tested for and the methods to be employed.
- 2.4 Results of any monitoring carried out shall be submitted to this local Authority within 8 weeks of being undertaken.
- 2.5 A detailed record shall be kept of all organic solvents used in the permitted process, 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 the Secretary of States Guidance Note PG 6/34(04) Respraying of Road Vehicles, e.g. gun-wash, top-coat (2 coat)
 - b) the amount of solvent in each product in grams per litre of product
 - c) the total amount of product used in the previous 12 month 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 forwarded to the local authority once in every 12-month period.

3.0 STACKS, DUCTS AND PROCESS VENTS

- 3.1 The emissions from the spraying or curing of coatings in the Nova Verta booths shall only be emitted to atmosphere via the dry filtration system and stacks S1 and S2 as shown on plan PPC/108/B.
- 3.2 Emissions from the C – Air dust extraction system shall not be emitted to atmosphere but be directed into sealed collection bags and back into the workplace.

- 3.3 The height of the stacks S1 and S1 shall terminate a minimum of 3 metres above the roof ridge level.
- 3.4 Stacks S1 and S2 shall not be fitted with a plate, cap cowl or similar device except by prior written approval from this Local Authority in the case of high velocity discharge cones.

4.0 GENERAL OPERATIONS

- 4.1 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.
- 4.2 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.
- 4.3 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.
- 4.4 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.
- 4.5 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.
- 4.6 The operator shall make available on demand and without charge any of the records required to be kept by this permit.
- 4.7 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.

5.0 SOLVENT EMISSIONS REGULATIONS

- 5.1 The operator shall identify products or materials that are/contain risk phrased substances/materials 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.

5.2 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 compliant coatings and controlled and monitored use of gunwash and thinners	

The operator shall notify the local authority of his intention to comply with the solvent reduction scheme by 31st October 2005.

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).

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/108 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/108/A Styner Holdings Ltd.



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