

APPLICATION FOR AUTHORISATION UNDER
SECTION 6 OF THE ENVIRONMENTAL PROTECTION ACT 1990

1. Either Name and address of applicant*
UNIPART EBERSPÄCHER EXHAUST SYSTEMS LTD,
BERESFORD AVENUE,
COVENTRY, CV6 5LZ

Or Name, number and registered office of applicant company* (if applicable)

* the person/company who will operate the process. not for example the person/consultant who is writing the application on the operator's behalf.

2. Name and address of premises where process is or will be carried on (not applicable to mobile processes).

AS ABOVE

3. Address for correspondence if different from 1.

AS ABOVE

4. List of maps or plans enclosed with the application showing the location of the premises where the process is or will be carried on.

LOCATION OF PREMISES

LOCATION OF PAINT PLANT & STORE

LAYOUT OF PAINT PLANT & STORE.

STACK LAYOUT OF PAINT PLANT.

Where the process is or will be carried on, only part of the premises whose address is given at 2 above, either describe which part of the premises or list the plan(s) which identifies these parts.

THE FACTORY COMPRISES OF BLOCKS 'A' TO 'L'.

THE PROCESS WILL BE CARRIED OUT IN BLOCK 'A'.

received 27th November 2001

5. List of attached documents comprising part of the application**.

MATERIAL DATA SHEETS - FUEL TANK PAINT 3200-5-7

MATERIAL DATA SHEETS - EXHAUST PAINT 2700-5-6.

MATERIAL DATA SHEETS - EXHAUST PAINT 3600-5-1.

MATERIAL DATA SHEETS - TOGOPLAST QR84T ANTICHIP.

MATERIAL DATA SHEETS - RIDOLINE S07 AQUEOUS CLEANER.

MATERIAL DATA SHEETS - QUASETEC 7770 BOOTH WATER ADDITIVE.

UBES ENVIRONMENTAL POLICY, COPY OF ISO14001 ACCREDITATION CERTIFICATE.

(use continuation sheet if necessary)
COPY OF: DI CAL'N FOR STACK HEIGHT, MONITORING FOR SPRAY BOOTH, STACK HEIGHT CONFIRMATION
** MAINTENANCE SCHEDULE.

Regulation 2 of the Environmental Protection (Applications, Appeals and Registers) Regulations 1991 requires that all applications must include the following information *for guidance on these requirements, see general Guidance Note No. 3 - "Secretary of State's Guidance: Application and Registers", HMSO 1991):

Description of the prescribed process.

List of prescribed substances (and any other substances which might cause harm if released into the air) used in connection with or resulting from the prescribed process.

Description of the techniques to be used for preventing releases into the air of such substances for reducing such substances to a minimum and for rendering harmless any such substances that are released.

Details of any proposed release of such a substance into the air and an assessment of the environmental consequences.

Proposals for monitoring any release of such substances, the environmental consequences of any such release and the use of techniques for prevent or control releases.

The matters on which the applicant relies to establish that the objectives in Section 7(2) of the Act will be achieved and that they will be able to comply with the condition implied by Section 7(4) of the Act.

The applicant may also supply any other information they wish the Local Authority to take into account in considering the application.

Fee enclosed (Cheque to be made payable to Coventry City Council) £1280

Please contact Environmental Protection on 831834 to be advised of the current application fee

I hereby certify that all the information contained in this application is, to the best of my knowledge, correct.

Signature:  Date 26/11/01

Status of Signatory above QUALITY/ENVIRONMENTAL MANAGER

UNIPART EBERSPACHER EXHAUST SYSTEMS

APPLICATION TO OPERATE A PRESCRIBED PROCESS

ENVIRONMENTAL PROTECTION ACT 1990 PART 1

The Environmental Protection (prescribed processes and substances) Regulations 1991 SI

The Environmental Protection (applications, appeals and registers) Regulations 1991 SI

APPLICATION FOR AUTHORISATION UNDER SECTION 6 OF THE
ENVIRONMENTAL PROTECTION ACT 1990.

1. Name and address of applicant.

***UNIPART EBERSPACHER EXHAUST SYSTEMS LTD
BERESFORD AVENUE
COVENTRY
CV6 5LZ***

2. Name and address of premises where process will be carried out

***UNIPART EBERSPACHER EXHAUST SYSTEMS LTD
BERESFORD AVENUE
COVENTRY
CV6 5LZ***

3. Address for correspondence

***UNIPART EBERSPACHER EXHAUST SYSTEMS LTD
BERESFORD AVENUE
COVENTRY
CV6 5LZ***

4. list of maps and plans enclosed with application

Map 1 - location of premises

Map 2 - location of paint plant & store

Map 3 - layout of paint plant & store

Map 4 - stack layout of paint plant.

List of attachments also enclosed with application

Material data sheets - fuel tank paint 3200-5-7

Material data sheets - exhaust paint 2700-5-6

Material data sheets - exhaust paint 3600-5-1

Material data sheets - Togoplast QR84T antichip

Material data sheets - Ridoline 507 aqueous cleaner

Material data sheets - quasetec 77170 booth water additive

Copy of D1 calculation for stack height.

Copy of monitoring for spray booth

Copy of stack height confirmation and maintenance procedure.

Copy of UEES Environmental policy.

Copy of ISO 14001 accreditation.

UNIPART EBERSPACHER EXHAUST SYSTEMS

APPLICATION TO OPERATE A PRESCRIBED PROCESS

BACKGROUND.

Unipart Eberspacher Exhaust Systems (UEES) have been painting a small quantity of exhaust systems at the Beresford Avenue site in Coventry, but due to the drop in volume, authorisation has no longer been required as the quantity of material used was well below the 5 tonne per year threshold.

Oxford Automotive Components (OAC) have been painting metal fuel tanks at the Woodstock road site in Oxford with an authorisation from Oxford city council [ref. No. EPA/14A/97 dated 15/05/1997]. The basis for the authorisation is that the process uses water base paint i.e. a compliant material as per guidance note PG6/23(97).

Due to the closure of OAC at the end of 2001, the metal fuel tank manufacture will be transferred to UEES. This means that a new paint facility will be installed at UEES to paint both exhausts and metal fuel tanks. This new facility needs to commence production in January 2002. This process requires authorisation as a part B process under the Environmental Protection Act reference guidance notes PG6/23(97).

PROCESS OUTLINE.

Fuel tanks and exhausts are hung on the paint conveyor (see plant layout map 3) and pass through the cleaning process. This consists of two banks of sprays of hot (60 °C) diluted (1 to 2%) aqueous cleaner Ridoline 507 followed by 3 water rinses. Excess water is removed by an air knife blow followed by an oven dry. The fuel tanks are then coated on one side with Togoplast QR84T antichip material, this is a high solids low solvent compliant material (see page 3) VOC content 21 gms/litre. The material is applied manually using an airless spray system in a dry filter booth. The other side of the fuel tanks are then coated with a water based paint (see page 3) which is a compliant material having a VOC content of 181 gms/litre. The coating is carried out using manual HVLP (high volume low pressure) spray guns in a water washed spray booth. The exhausts are also painted in this booth using HVLP manual spray and compliant water based paints (see page 3). The fuel tanks and exhausts are then stoved in an oven for 25 minutes reaching 160 °C, after cooling they are removed from the conveyor for final assembly and despatch.

UNIPART EBERSPACHER EXHAUST SYSTEMS

APPLICATION TO OPERATE A PRESCRIBED PROCESS

MATERIALS

1) Fuel tank paint (water based)

Spencer coatings Nuaqua Tank Black 3200-5-7 see attached H & S data sheets.
V.O.C. Content 181 gms/litre i.e. Compliant material ref. Clause 20 c (ii).
Quantity used approximately 40,000 litres per year supplied in 200 litre drums.

2) Exhaust paints (water based)

(a) Spencer coatings Nuaqua H/R Matt Black 2700-5-6 see H & S data sheets.
V.O.C. Content 244 gms/litre i.e. Compliant material ref. Clause 20 c (ii).
Quantity used approximately 9,600 litres per year supplied in 200 litre drums.

(b) Spencer coatings Nuaqua H/R Grey/ Black 3600-5-1 see H & S data sheets.
V.O.C. Content 297 gms/litre i.e. Compliant material ref. Clause 20c(ii).
Quantity used approximately 5,000 litres per year supplied in 200 litre drums.
NOTE - This will be a new paint used at UEES, this painting process is currently carried out by Malcolm's Ltd of Wednesbury.

3) Cleaning Solvents

Spencer coatings T95 used for cleaning spray guns and equipment only see attached H & S data sheets. VOC content 850 gms/litre. Quantity used 500 litres per year, used dirty solvent disposed via licensed waste contractor as special waste.
NOTE - water is used for flushing through paint lines and guns.

4) Antichip Coat

EFFTEC Togoplast QR 84T, this is a high solids (98.4%) mixture of P.V.C., inert filler, pigment, plasticiser and a very small amount of solvent see attached H & S data sheet.
V.O.C. Content 21 gms/litre [non volatile content 98.4%].
Quantity used approximately 60,000 litres per year supplied in 200 litre drums.

5) Aqueous Cleaner

Henkle Technologies Ridoline 507, this is a neutral aqueous cleaner see attached H & S data sheet, the material is used diluted between 1.0 & 2.0 % and heated to 60°C.
The material is supplied in returnable 1,000 litre plastic cage/tanks.

6) Booth Water Additive

Quasetec 77170, this is a cationic polymer solution see attached H & S data sheet. The material is dosed into the spray booth water of the water washed booth. Its function is to de-nature the paint build up in the water due to overspray so that the system cannot clog up and remains fully efficient. The material is supplied in returnable 1,000 plastic cage/tanks.
In addition a small quantity of hydrated lime (1 kg per day) is added to the booth water to enable the Quasetec 77170 to work more efficiently holding the paint particles in suspension.

UNIPART EBERSPACHER EXHAUST SYSTEMS

APPLICATION TO OPERATE A PRESCRIBED PROCESS

STORAGE

The cleaning solvent T95 is stored in a flammable material container. The paint and antichip is stored in the paint plant area on spill retention stands. The chemicals are also stored in the paint plant area where they are used.

HANDLING

All deliveries of paint are received on pallets, they are transported to the storage area by fork lift truck. Suitable spill kits are sited and available in the event of an accident, employees are trained in their use as per the emergency procedure in the company's environmental management system.

DISCHARGES

a) Discharges to sewer

Rinse water from the spray cleaning process which contain a small quantity of cleaner is discharged to the sewer in accordance with the consent to discharge from Severn Trent Water.

b) Discharges to air

There are 8 discharge points to atmosphere from the paint plant (see map 4 & copy of D1 calculation).

- (1) Outlet from the paint spray booth.
- (2) Spray clean - excess steam and fine water spray/vapour from the spray tunnel.
- (3) Outlet from the stoving oven.
- (4) Outlet from the antichip spray booth.
- (5) Blow off after clean - fine water spray/vapour from the spray tunnel..
- (6) Outlet from stoving oven air seal.
- (7) Outlet from drying oven air seal.
- (8) Outlet from drying oven air seal.

c) Disposal of waste

The waste will always be stored in a designated area on spill retention stands.

- (i) Antichip spray booth - the antichip overspray is collected in drums and disposed as special waste by a licensed contractor.
- (ii) Paint spray booth - periodically when the paint solids content of the booth water builds up it is gulped out by a licensed waste contractor and disposed of as non-special liquid waste.
- (iii) Any dry paint solids removed and disposed of as non-special waste via a licensed waste contractor.
- (iv) Any waste/used and dirty spray gun cleaning solvent is collected in a 200 litre drum and disposed of as special waste by a licensed waste contractor.
- (v) The empty paint and antichip drums are collected by a licensed drum recycling contractor.
- (vi) The cleaner solution and rinses are discharged to sewer as per the Severn Trent consent to discharge.

UNIPART EBERSPACHER EXHAUST SYSTEMS

APPLICATION TO OPERATE A PRESCRIBED PROCESS

MALFUNCTIONS

- a) Gas supply - when gas pressure falls below a preset limit the gas burners will shut down automatically.
- b) Gas burner failure - all the burners are designed to shut down in a safe fashion when a component fails or there is a power failure.
- c) Extraction and Recirculating fans - all the systems are interlinked so that the plant will stop if a fan motor fails and the burners will automatically shut down. The booth extraction fans have pressure sensors such that the spray equipment will not function if an extraction fan fails (see attached copy of e-mail)
- d) Fire - both the water based paint and the antichip are not fire hazards.
- e) Spillage - all materials are stored on spill retention stands and in addition spill kits are sited in the area and personnel are trained in emergency procedures.

ABATEMENT TECHNIQUES

The filters in the antichip booth will significantly reduce particulates from being discharged to atmosphere. The wet back paint booth also reduces discharge of particulates to atmosphere to well below the prescribed limits (see attached report of monitoring from similar booth).

MAINTENANCE

UEES in conjunction with the paint plant manufacture DURR will write a planned maintenance schedule (see attached maintenance schedule from Durr) for the paint plant and obtain and store all critical spares.

ENVIRONMENTAL

UEES has an established environmental policy (see attachment) and has been accredited to ISO 14001 (see attached certificate).

UNIPART EBERSPACHER EXHAUST SYSTEMS

APPLICATION TO OPERATE A PRESCRIBED PROCESS

PRESCRIBED SUBSTANCES

Although the particulate matter produced during spraying is a prescribed substance, the booth filter system will maintain a level below the prescribed limit of 50 gms/m³; the solvent content is also below the limit of 350 gms/liter of V.O.C. There are no other prescribed substances which could cause harm if released into the air. It is not proposed to introduce any other substances in the foreseeable future.

MONITORING

UEES will undertake to monitor (by employing an accredited contractor) the output from the spray booths to confirm the emissions are within the prescribed limits. Both spray booth outlets will be fitted with monitoring access ports as per BS 3405, UEES will provide safe access to the exterior of the roof for a contractor to monitor the outlets.

We hereby certify that all the information contained in this application is to the best of my knowledge correct.

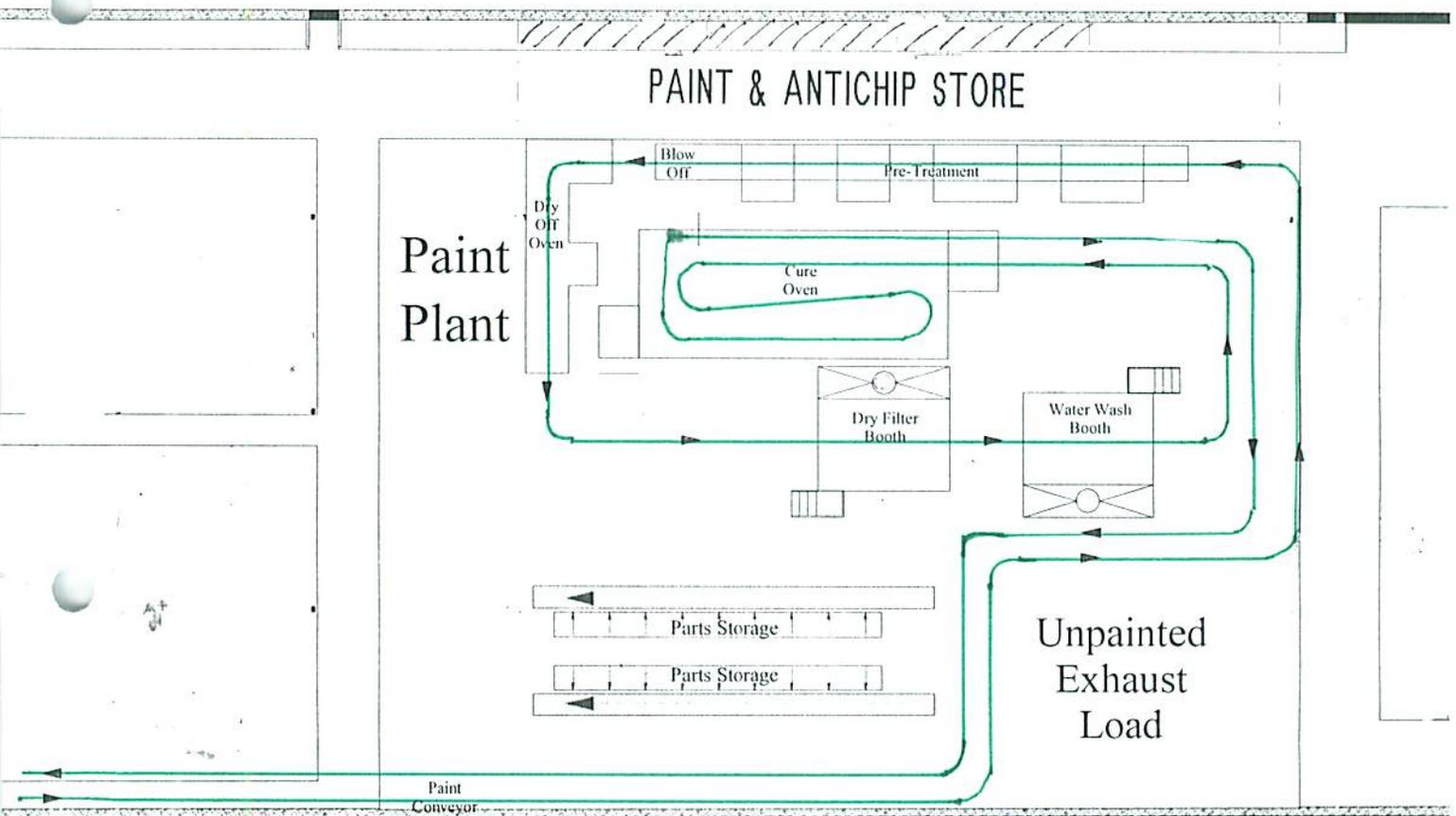
Signature 

Position *QUALITY/ENVIRONMENTAL MANAGER*

Date *26/11/01*

Please also find enclosed a cheque for £1,280 made payable to Coventry City Council.

MAP.3 LAYOUT OF PAINT PLANT





Coventry City Council

158

PERMIT REFERENCE: PPC 165

Unipart Eberspacher Exhaust Systems Ltd

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

Process Address	Beresford Avenue Coventry CV6 5LZ
Process Type	Metal Coating
Current Operator	Unipart Eberspacher Exhaust Systems Ltd Beresford Avenue Coventry CV6 5LZ
Previous Operator	n/a
Date of Application	1 st April 2004
Date Permit Issued	10 th February 2005

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

DOCUMENT A : PERMIT

Unipart Eberspacher Exhaust Systems Ltd

Reference Number PPC/158

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:

Unipart Eberspacher Exhaust Systems Ltd

Whose registered office is:

**Beresford Avenue
Coventry
CV6 5LZ**

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:

**Unipart Eberspacher Exhaust Systems Ltd
Beresford Avenue
Coventry
CV6 5LZ**

The permit is subject to the conditions specified in this document consisting of 13 pages and comprising documents A, B and C, plans PPC/158/A, PPC/158/B and Appendix 1.

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

Dated ...1.01.2005.....

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 PG6/23(04) – The Coating of Metal and Plastic
- 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: Rachel King
Permit Checked By: Susan Simmons

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/041/A in addition to the Installation boundary that is marked in red. The internal layout of the paint shop is shown on the attached plan PPC/ 041/B.

Description of Installation

- The delivery to and storage of paints, and cleaning solvents in the paint store
- The degreasing of metal components using dilute aqueous cleaner and rinsing with town water, and oven drying in the oven
- The spraying of metal components in the dry filter spray booth employing airless spray guns for all applications
- The spraying of metal components in the water wash spray booth employing High Volume Low Pressure guns for all applications
- The oven curing of metal components in the curing oven

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	Pre-treatment Line and Oven	None	None	None
2	Dry filter spray booth	VOC's Particulates	1.3, 1.5	Dry filters
3	Water wash spray booth	VOC's Particulates	1.3, 1.5	Water wash filtration system
4	Post coating Curing Oven	VOC's	1.5	None

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 process boundary, as perceived by the local Authority Inspector.
- 1.2 There shall be no emissions of particulate matter noticeable beyond the installation boundary.
- 1.3 The following emissions to atmosphere, expressed as fifteen-minute mean shall not be exceeded
 - (a) Total particulate matter from the stacks serving the dry filter booth, and waster wash booth 50mg/m³.
- 1.4 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.
- 1.5 All paint, diluents and cleaning solvents used in the process shall comply with the solvent specifications of appendix 3 of the Secretary of State's process guidance note PG6/23(04) – "Coating of Metal and Plastics"

2.0 MONITORING, SAMPLING AND MEASUREMENT OF EMISSIONS

- 2.4 Emissions from the dry filter booth and water wash filter booth shall be tested for particulates at least once every 12 months.
- 2.5 The Authority shall be notified 7 days in advance of any periodic monitoring to demonstrate compliance with clause 1.3. This notification shall include the provisional date, and time of the monitoring, pollutants to be tested, and the method to be used
- 2.6 The results of the monitoring to demonstrate compliance with clause 1.3 shall be forwarded to this Local Authority within 8 weeks of the monitoring taking place.
- 2.9 A record shall be kept of all organic solvents used in the process. A summary shall be forwarded to the local authority every 12 months and shall include
 - (a) The name of the product and product type according to the categories outlined in appendix 3 of the Secretary of State process guidance note PG6/23(04)-Coating of Metal and Plastics.

- (b) The total amount of solvent in each product in grams of solvent per litre of product
- (c) The total amount of each product used in the previous 12 months
- (d) The total amount of solvent used in the process in the previous 12 months

3.0 OPERATIONAL CONTROLS

- 3.1 The application of coatings shall only take place within the dry filter and wet wash spray booths and shall only take place when the booths and associated filtration and extraction systems are functioning correctly.
- 3.2 Spray guns shall only be cleaned and tested in the dry filter and wet back spray booth using the direct delivery of solvents through sealed pipework. Sprayout shall be collected into a separate receptacle for recycling or re-use, and shall not be sprayed directly into the booth.
- 3.3 The water of the wet wash spray booth shall be automatically dosed with a flocculating agent in accordance with manufacturers instructions.
- 3.4 A supply of dry filters for use in the dry filter spray booth shall be kept on site at all times, and shall be readily available for use.
- 3.5 All waste filters which contain particulate matter shall be stored in sealed bags or enclosed containers whilst waiting for disposal
- 3.6 Storage drums that hold or have held organic solvents shall be sealed whilst not in use or awaiting disposal.
- 3.7 The air flow in the dry filter and wet wash spraybooths shall be controlled by maintaining a negative pressure in the spray areas. Continuous monitoring of the air balance shall take place to ensure emissions are contained. Any imbalance shall be remedied before the next use of the booth. Any faults and repairs shall be recorded in the process logbook. Records of inspection shall be kept for a minimum of two years and shall be made available to the Local Authority Inspector on request.
- 3.8 Organic solvent materials such as coating or cleaning solvents shall be delivered directly to the dry spray booth and wet wash spray booth using sealed pipe work. The pipe work shall be inspected for wear, tear and leakage every 12 months. The inspection and any faults noted and repairs undertaken shall be recorded in the logbook. Records of inspection shall be kept for a minimum of two years and shall be made available to the Local Authority Inspector on request.

4.0 STACKS, DUCTS AND PROCESS VENTS

- 4.1 Emissions from all spraying operations in the dry filter spray booth shall only be emitted to atmosphere via the dry filters.
- 4.2 Emissions from all spraying operations in the wet wash spray booth shall only be emitted to atmosphere through the wet back spray filter.
- 4.3 The final discharge height of stacks serving the dry filter and wet wash spray booth shall be at least 2.4 metres above the roof ridge level.
- 4.4 Chimney or process vents shall not be fitted with a plate, cap, or cowls or other restrictions unless by prior written approval with this local authority.

5.0 GENERAL OPERATIONS

- 5.1 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.
- 5.2 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.
- 5.3 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.
- 5.4 The operator shall make available on demand and without charge any of the records required to be kept by this permit.
- 5.5 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 COMPLIANCE WITH SOLVENT EMISSIONS REGULATIONS

- 6.1 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.

6.2 The operator shall demonstrate compliance with the Solvent Emissions (England & Wales) Regulations 2004 by one of the following methods:

- 1) By 31st October 2007 achieve the following VOC emission limits expressed as total excluding particulate matter over a 30 minute mean:

Release Point	Emission Limit
Waste gases from oxidation plant	50 mg/Nm ³
Waste gases from turbines reciprocating engines or boilers used as abatement plant	150 mg/Nm ³ till 2013 50 mg/Nm ³ after 2013 for drying processes 50 mg/Nm ³ after 2013 for other processes
Any other waste gases	75 mg/Nm ³

Fugitive Emission Limit Value = 20 % of solvent input

Or

- 2) The use of a Solvent Reduction Scheme to demonstrate the achievement of a Target Emission which is calculated by identifying the total amount of solids used in coating material in a 12 month period (all ingredients other than water and organic solvents should be assumed to form part of the solid coating. The Target Emission is as follows:

Existing Installations at 1/12/98	Existing Installations at 31/10/05	Existing Installations at 31/10/07
Total Mass of Solid x 1	Total Mass of Solid x 0.56	Total Mass of Solid x 0.37

Written notification that the operator wishes to comply with the solvent reduction scheme shall be sent to the Local Authority by 31st October 2005.

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/ 158 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. The permit shall accompany such an application 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

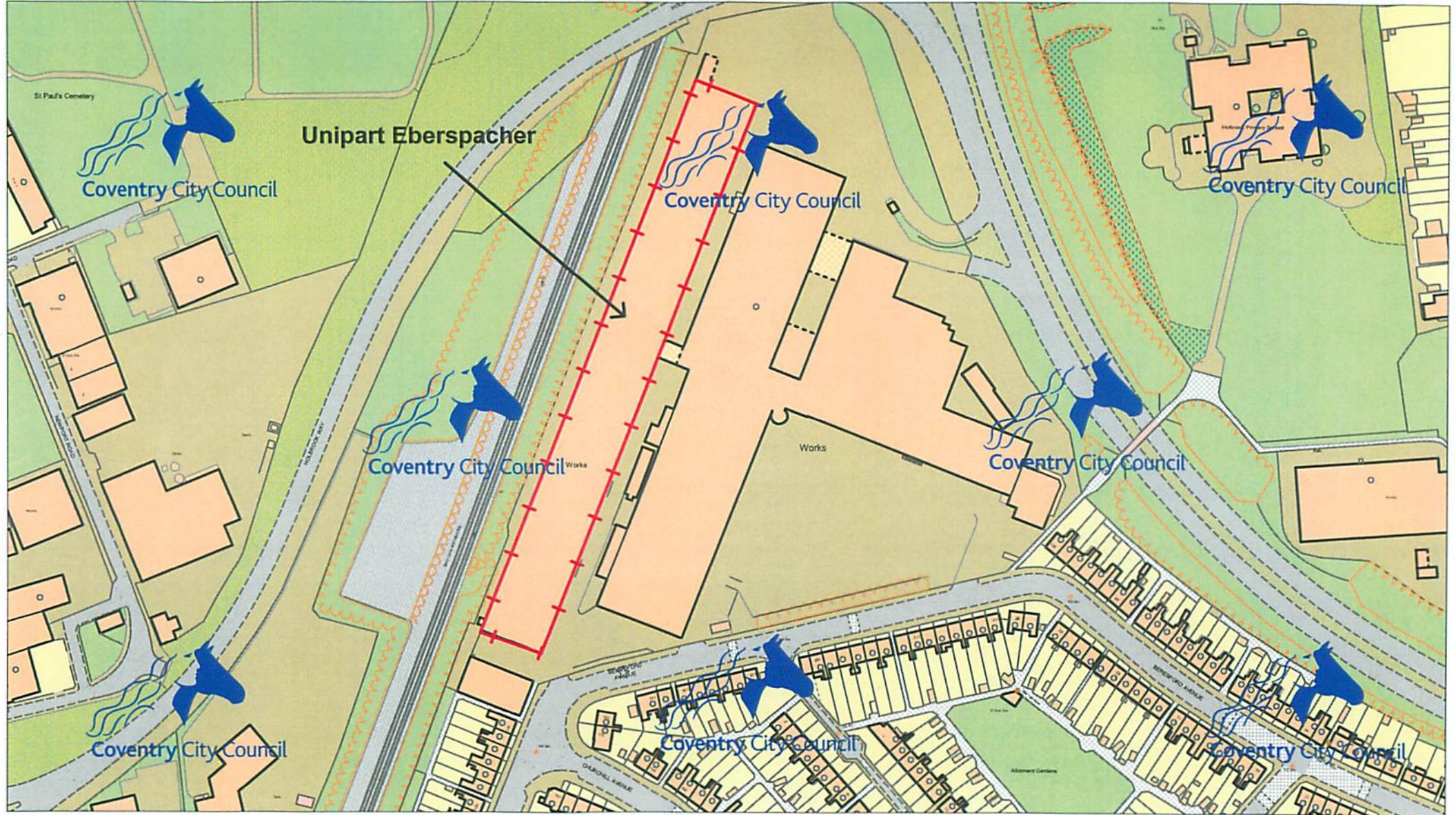
The documented procedure by which reliable and comparable results are obtained from measurements at source is known as a Protocol.

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.**



City Services Directorate
 Environmental Health
 Environmental Protection
 Broadgate House, Broadgate
 Coventry, CV1 1NH

Tel: 024 7683 1832
 Fax: 024 7683 1840

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PPC Permit ref:- PPC/158
Revocation ref: 001

Coventry City Council
The Pollution Prevention and Control (England and Wales) Regulations 2000 Regulation 21

Revocation Notice

To The Company Secretary
Unipart Eberspacher Exhaust Systems Ltd
Beresford Avenue
Coventry
CV6 5LZ

[Coventry City] Council ("the Council), in the exercise of the powers conferred upon it by regulation 21 of the Pollution Prevention and Control (England and Wales) Regulations 2000¹ ("the 2000 Regulations") hereby gives you notice as follows-

The permit reference PPC/158 is hereby revoked with effect from 12th February 2006 (not being less than 28 days from the date of this notice).

Signed on behalf of [Coventry City} Council

.....

Date.....

An authorised officer of the Council

¹ S.I. 2000 No. 1973 to which there are amendments not relevant to this revocation notice.

Guidance for operators receiving a Revocation Notice

(This guidance does not form part of the Revocation Notice, but it is for the guidance of those serving the notice).

Dealing with a Revocation Notice

This notice revokes the permit (in whole or in part) for operation of the installation specified in the Notice.

The revocation/partial revocation takes effect from the date given in the notice. From that date onwards continuation of the operation or that part specified will constitute an offence.

Appeals

Under regulation 27(2) of the 2000 Regulations operators have the right to appeal against a revocation Notice. The right to appeal does not apply in circumstances where the notice implements a direction of Secretary of State given under regulations 12(15) (directions to regulators), 36 (general directions to regulators), paragraph (4) of regulation 27 (Appeals), paragraph 14(6) of Schedule 4 (directions determining variation of permits).

Appeals against a revocation notice will suspend the operation of the notice. Appeals do not have the effect of suspending permit conditions. Notice of appeal against a revocation notice must be given before the date specified for revocation of the permit. The Secretary of State may in particular case allow notice of appeal to be given after the expiry of this period, but would only do so in the most compelling circumstances.

How to appeal

There are no forms or charges for appealing. However, for an appeal to be valid, appellants (the person/operator making the appeal) are legally required to provide (see Schedule 8 of the 2000 Regulations, paragraph 1):

- Written notice of the appeal
- A statement of the grounds of appeal;
- A statement indicating whether the appellant wishes the appeal to be dealt with by written representations procedure or a hearing --a hearing must be held if either the appellant or enforcing authority requests this, or if the Planning Inspector or the Secretary of State decides to hold one;
- (appellants must copy the above three items to the local authority when the appeal is made)
- a copy of any relevant application;
- a copy of any relevant permit
- a copy of any relevant correspondence between the appellant and the regulator; and

- a copy of any decision or notice, which is the subject matter of the appeal.

Appellants should state whether any of the information enclosed with the appeal has been the subject of a successful application for commercial confidentiality under regulation 31 of the 2000 Regulations, and provide relevant details. Unless such information is provided all documents submitted will be open to inspection.

Further guidance on commercial confidentiality can be found in chapter 8 of the LA-IPPC and LAPPC manual.

Where to send your appeal documents

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

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

On receipt of an appeal and during the appeal process the main parties will be informed about the next steps, and will also normally be provided with additional copies of each other's representations.

To withdraw an appeal – which may be done at any time – the appellant must notify the Planning Inspectorate in writing and copy the notification to the local authority who must in turn notify anyone with an interest in the appeal.

Costs

Guidance from the Planning Inspectorate states that operator and regulator would be normally expected to pay their own expenses during an appeal. Where a hearing or enquiry is held as part of the appeal process, by virtue of Schedule 8, paragraph 4(10) of the 2000 Regulations, either the appellant or the local authority can apply for costs. Applications for costs are normally heard towards the end of the proceedings and will only be allowed if the party claiming them can show that the other side behaved unreasonably and put them to unnecessary expense. There is no provision for costs to be awarded where appeals are dealt with by written representatives.

Offences

The operation of an installation subject to LA-IPPC or LAPPC without the benefit of a permit is an offence under regulation 32 of the 2000 Regulations. A person guilty of an offence under this regulation could be liable to (i) a fine of up to £20,000 or to imprisonment for a term not exceeding 6 months or both; or (ii) to a fine or imprisonment for a term not exceeding five years or both (regulation 32).