PPC Permit ref: 058
Variation ref: 001

Coventry City Council
The Pollution Prevention and Control (England and Wales) Regulations 2000 Regulation 17

# Variation Notice

To: **Stadco Ltd**
**Harlecott Lane**
**Shrewsbury**
**Shropshire**
**SY1 3AS**

Coventry City Council ("the Council"), in the exercise of the powers conferred upon it by regulation 17 of the Pollution Prevention and Control (England and Wales) Regulations 2000[1] ("the 2000 Regulations") hereby gives you a notice as follows-

The Council has decided to vary the conditions of permit reference **058** granted under regulation 9(1) of the 2000 Regulations in respect of the operation of the installation/mobile plant at:

**Stadco Coventry Ltd**
**Holbrook Lane**
**Coventry**
**CV6 4AW**

The variation of the conditions of the permit and date [s} on which they are to take effect are specified in Schedule 1 to this notice. A consolidated permit as varied by this notice is set out in Schedule 2.

Signed on behalf of Coventry City Council

…… Date 5th December 2006
Environmental Health Officer
An authorised officer of the Council

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

PPC Permit ref: **058**
Variation ref: **001**

Schedule 1

| Variation to the conditions of the permit | Date(s) on which the variation is to take place |
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| **In Document A, Brief Description of the Installation Regulated by this Permit, insert a new definition as follows:**<br>**"Regulator** shall mean the body responsible for the enforcement of the conditions contained within this Permit." | Immediately |
| **In Document A, Brief Description of the Installation Regulated by this Permit, delete the following sentence:**<br>"The general location of the Authorised Process is marked in red on the attached plan PPC/058/A page X. The Installation boundary is marked in red on the attached plan."<br>**And replace with the following:**<br>"The general location, installation boundary and internal layout of the Authorised Process is shown on the attached plan PPC/058/A page 21" | Immediately<br><br>Immediately |
| **In Document A, Brief Description of the Installation Regulated by this Permit, delete the following sentence:**<br>"Note to Officers and Operator: Due to proposed changes that will affect the contents of this Permit, the contents have not been reviewed. A complete review of the contents of this document must be undertaken before the end of 2005." | Immediately |
| **In Document A, Description of Installation, delete the following phrase:**<br>"can be coated in one of several areas"<br>**And replace with the following:**<br>"are either coated in the electrophoretic dip area, or the sealer booth" | Immediately<br><br>Immediately |
| **In Document A, Description of Installation, Electrophoretic Dip Area delete the following words:**<br>"pack primer"<br>**And replace with the following:**<br>"component (pigment/resin)" | Immediately<br><br>Immediately |
| **In Document A, Description of Installation, after the Electrophoretic Dip Area section, insert the following:**<br>**Tedak Operations**<br>A percentage of the E-coated product passes through this facility | Immediately |

<table>
<tr><td>i.e. taxi and MG body shells. These products are inspected for any defects i.e. dirt, E-Coat drips and contamination. If any defects are identified, they are repaired using an orbital sander. All areas that have broken through to bare metal are then repaired using an etch primer.</td><td></td></tr>
<tr><td>In Document A, Description of Installation, Surfacer Spraying Area (Sealer Booth),delete the following word:<br>"hot"</td><td>Immediately</td></tr>
<tr><td>In Document A, Description of Installation, Surfacer Spraying Area (Sealer Booth), after the words<br>“in order to aid adhesion”<br>Insert the following:<br>“The paint products used are water based. Particulates from the paint spraying process are entrained in treated circulating water air using a wet scrubber system.”</td><td>Immediately<br>Immediately</td></tr>
<tr><td>In Document A, Description of Installation, Surfacer Spraying Area (Sealer Booth), after the words<br>“around 150°C to 160°C”<br>Insert the following:<br>“The exhausted air is discharged direct to atmosphere.”</td><td>Immediately<br>Immediately</td></tr>
<tr><td>In Document A, Description of Installation, delete all text under the heading of “Prototype Area”</td><td>Immediately</td></tr>
<tr><td>In Document A, Table 1, row 4, column 2, after the word<br>“incinerator”<br>Insert the following:<br>“(abatement plant)”</td><td>Immediately<br>Immediately</td></tr>
<tr><td>In Document A, Table 1, row 4, column 5, delete the word<br>“None”</td><td>Immediately</td></tr>
<tr><td>In Document A, Table 1, row 5, column 5, delete the word<br>"water"<br>And replace with the word<br>"wet"</td><td>Immediately<br>Immediately</td></tr>
<tr><td>In Document A, Table 1, delete row 7.</td><td>Immediately</td></tr>
<tr><td>In Document A, Table 1, insert new row 8:<br><table><tr><td>8</td><td>Tedak Area</td><td>VOCs and particulates</td><td>None</td><td>Vacuum plant</td></tr></table></td><td>Immediately</td></tr>
<tr><td>In Document B, Emission Limits and Controls, Clause 1.1 delete the words</td><td>Immediately</td></tr>
</table>

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| "Local Authority Inspector"<br>**And replace with**<br>" Regulator" | Immediately |
| **In Document B, Emission Limits and Controls, insert new clause 1.2a:**<br>**"**Emissions shall be free from visible smoke, free from droplets, and except in the case of water vapour shall be free from visible emissions." | Immediately |
| **In Document B, Emission Limits and Controls, delete clause 1.3.** | Immediately |
| **In Document B, Emission Limits and Controls, insert new clause 1.3a:**<br>"Emissions from combustion processes shall, during normal operations be free from visible smoke and in any case shall not exceed the equivalent of Ringlemann Shade 1 as described in British Standard BS 2742: 1969" | Immediately |
| **In Document B, Emission Limits and Controls, insert new clause 1.3b:**<br>"In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions, or adverse results from any monitoring activity the Operator must investigate the cause immediately and undertake corrective action. A record of events shall be made in the site logbook described in Clause 2.13 below. If the emission is likely to affect the local community, or if it is as a result of the failure of key arrestment plant, then the Regulator must be informed immediately." | Immediately |
| **In Document B, Emission Limits and Controls, insert new clause 1.3c:**<br>"In cases of non-compliance causing immediate danger to human health, operation of the activity shall be suspended. All of the following criteria shall be taken into account:<br>• The toxicity and amount of the substances being released<br>• The location of the installation; and<br>• The sensitivity of the receptors" | Immediately |
| **In Document B, Emission Limits and Controls, clause 1.4, delete the following words:**<br>"except in accordance with clause 2.4 of this permit" | Immediately |
| **In Document B, Emission Limits and Controls, clause 1.4a, delete the following words:**<br>"and prototype"<br>**And change the units of measurement to:**<br>"mg/$Nm^3$ (as a 30 minute mean)" | Immediately<br>Immediately |
| **In Document B, Emission Limits and Controls, clause 1.4b, change the units of measurement to:** | Immediately |

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| "mg/Nm$^3$ (as a 30 minute mean)" | |
| **In Document B, Emission Limits and Controls, clause 1.4c, change the units of measurement to:**<br>"mg/Nm$^3$ (as a 30 minute mean)" | Immediately |
| **In Document B, Emission Limits and Controls, delete clause 1.4 d.** | Immediately |
| **In Document B, Emission Limits and Controls, clause 1.5, replace the word** | Immediately |
| "authorisation"<br>**With the word**<br>"permit" | Immediately |
| **And replace the word**<br>"should" | Immediately |
| **With the word**<br>"shall" | Immediately |
| **In Document B, Emission Limits and Controls, clause 1.6, delete the words**<br>"except in the case of the prototype booth (where high volume-low-pressure guns shall be utilised) and" | Immediately |
| **And replace with the word**<br>"or" | Immediately |
| **In Document B, Emission Limits and Controls, insert new clause 1.7:**<br>"By 31st October 2007 the tank containing electrocoat resin shall be enclosed as far as possible to minimise breathing losses. Where practicable it shall be back vented to the delivery tank during filling. Where this is impracticable, displaced air shall be vented in such a way as to prevent offensive odours being detected off site." | Immediately |
| **In Document B, Emission Limits and Controls, insert new clause 1.8:**<br>"By 31st October 2007 all potentially odorous waste materials shall be stored in suitable closed containers or bulk storage vessels, where appropriate vented to suitable arrestment plant." | Immediately |
| **In Document B, Emission Limits and Controls, insert new clause 1.9:**<br>" Coatings containing VOC shall be stored in closed storage containers to minimise emissions of VOCs." | Immediately |
| **In Document B, Emission Limits and Controls, insert new clause 1.10:**<br>"All processes / activities shall use fuel containing not more than 1% wt/wt sulphur in fuel. Where gas oil is used it shall contain not more than 0.2% wt/wt sulphur in fuel until 31st December 2007 and after that date not more than 0.1% wt/wt sulphur in fuel. Evidence shall be | Immediately |

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| demonstrated of compliance with this Clause by making available to the Regulator copies of the certification from the supplier using test method ASTM D86 distillation." | |
| **In Document B, Emission Limits and Controls, insert new clause 1.11:**<br>"Waste materials that are likely to contain particulate matter shall be stored in sealed bags or containers whilst awaiting disposal." | Immediately |
| **In Document B, Monitoring Sampling and Measurement of Emissions, re-write clause 2.1 to read:**<br>"Emissions monitoring shall not take place without prior approval from the Regulator." | Immediately |
| **In Document B, Monitoring Sampling and Measurement of Emissions, clause 2.2, delete the words**<br>"Local Authority"<br>**and replace with the word**<br>"Regulator" | Immediately<br><br>Immediately |
| **In Document B, Monitoring Sampling and Measurement of Emissions, re-write clause 2.3 to read:**<br>"The results of non-continuous emissions monitoring to comply with clause 1.4 (a) to (c) shall be submitted to the Regulator electronically within 8 weeks of the sampling taking place." | Immediately |
| **In Document B, Monitoring Sampling and Measurement of Emissions, delete clause 2.4** | Immediately |
| **In Document B, Monitoring Sampling and Measurement of Emissions, clause 2.5, delete the full stop at the end of the clause and insert the following in its place:**<br>"subject to the monitoring results obtained in respect of clause 2.6b below." | Immediately |
| **In Document B, Monitoring Sampling and Measurement of Emissions, clause 2.6, after the words**<br>"oven incinerator shall be"<br>**Insert the words**<br>"used as a surrogate measure to demonstrate the adequate destruction of VOCs. It shall be"<br>**And replace the words**<br>"Local Authority Inspector"<br>**With the word**<br>"Regulator" | Immediately<br><br>Immediately<br><br>Immediately<br><br>Immediately |
| **In Document B, Monitoring Sampling and Measurement of Emissions, insert new clause 2.6a:**<br>"The Continuous temperature monitoring readings shall be on display to appropriately trained operating staff. The instruments shall be fitted with audible and visual alarms, situated appropriately to warn the | Immediately |

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| Operator of abatement plant failure or malfunction. The monitor shall be set to provide a baseline output when the plant is known to be operating under the best possible conditions. An output level shall be set at approximately 75% of the theoretical emission limit (calculated as part of the solvent management plan) to trigger an alarm. The activation of such alarms shall be automatically recorded." | |
| **In Document B, Monitoring Sampling and Measurement of Emissions, insert new clause 2.6b:**<br>"Emissions of VOC (expressed as mass concentration of total gaseous organic carbon) from the electrocoat oven incinerator shall be monitored annually in order to assess the amount of VOCs emitted from the exhaust stack following abatement. This data shall be used to assess whether the installation complies with the target emission value in Clause 6.2, and shall also be used to set an efficient temperature for the destruction of VOCs. The continuous flame ionisation detector method EN 13526 shall be used and at least three readings must be obtained during each measurement exercise." | Immediately |
| **In Document B, Monitoring Sampling and Measurement of Emissions, insert new clause 2.6c:**<br>"All new continuous monitoring equipment shall be designed for less than 5% downtime over any 3-month period." | Immediately |
| **In Document B, Monitoring Sampling and Measurement of Emissions, clause 2.7 delete the words**<br>"and prototype" | Immediately |
| **And after the words**<br>"Clause 1.4" | Immediately |
| **Insert**<br>"(a)" | Immediately |
| **In Document B, Monitoring Sampling and Measurement of Emissions, clause 2.8, after the words**<br>"Clause 1.4" | Immediately |
| **Insert**<br>"(b) and (c)" | Immediately |
| **In Document B, Monitoring Sampling and Measurement of Emissions, delete clause 2.9** | Immediately |
| **In Document B, Monitoring Sampling and Measurement of Emissions, delete clause 2.10** | Immediately |
| **In Document B, Monitoring Sampling and Measurement of Emissions, insert new clause 2.11:**<br>"The Operator shall ensure that adequate facilities for sampling are provided on vents and ducts. Sampling points on all new plant shall be designed to comply with the relevant British or equivalent standard." | Immediately |
| **In Document B, Monitoring Sampling and Measurement of** | Immediately |

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| **Emissions, insert new clause 2.12:**<br>"No monitoring result shall exceed the emission concentration limits specified, except where either:<br>(a) Data is obtained over at least 5 sampling hours in increments of 30-minutes or less; or<br>(b) At least 20 results are obtained where sampling time increments of more than 30-minutes are involved; AND in the case of (a) or (b)<br>(c) No daily mean of all 30-minute mean emission concentrations shall exceed the specified emissions concentrations limits during normal operation (excluding start up and shut down); and<br>(d) No 30-minute mean emission concentration shall exceed twice the specified emission concentration limits during normal operation (excluding start up and shut down) | |
| **In Document B, Monitoring Sampling and Measurement of Emissions, insert new clause 2.13:**<br>"The Operator shall keep records of inspections, tests and monitoring, including all non-continuous monitoring, inspections and visual assessments. The records shall be kept on site by the Operator for a period of at least two years and shall be made available to the Regulator to examine on request. This shall be known as the site logbook." | Immediately |
| **In Document B, Operational Controls delete clause 3.1** | Immediately |
| **In Document B, Operational Controls, Clause 3.2, after the words:**<br>"wet scrubber" | Immediately |
| **Insert the words**<br>"solids entrainment system" | Immediately |
| **And after the words**<br>"anti foaming" | Immediately |
| **Insert the words**<br>"coagulation and flocculation" | Immediately |
| **And make the word "agent" plural** | Immediately |
| **In Document B, Operational Controls Clause 3.3, after the words:**<br>"wet scrubber" | Immediately |
| **Insert the words**<br>"solids entrainment system" | Immediately |
| **And after the words**<br>"anti foaming" | Immediately |
| **Insert the words**<br>"coagulation and flocculation" | Immediately |
| **And make the word "agent" plural** | Immediately |
| **In Document B, Operational Controls, clause 3.4, after the words:**<br>"wet scrubber" | Immediately |
| **Insert the words**<br>"solids entrainment system" | Immediately |
| **And delete the words:**<br>"a process logbook" | Immediately |

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| **And replace with the words**<br>"the site logbook as described in clause 2.13 above." | Immediately |
| **In Document B, Operational Controls, clause 3.5, after the words:**<br>"wet scrubber" | Immediately |
| **Insert the words**<br>"solids entrainment system" | Immediately |
| **And delete the words:**<br>"Any such failures shall be recorded in a process logbook detailing the cause of the failure and the remedial action taken. The logbook shall be available to the Local Authority Inspector on request" | Immediately |
| **And replace with:**<br>"Details of any such failures, the cause of the failure and the remedial action taken shall be recorded in the site logbook as described in clause 2.13 above." | Immediately |
| **In Document B, Operational Controls, delete clause 3.6.** | Immediately |
| **In Document B, Operational Controls, clause 3.7, after the words**<br>"wet scrubber" | Immediately |
| **Insert the words**<br>"solids entrainment system" | Immediately |
| **And delete the words:**<br>", and the prototype booth" | Immediately |
| **In Document B, Operational Controls, clause 3.7, delete the following words:**<br>"shall be kept including any faults noted and remedial action taken, and retained on site for a minimum of 2 years, being made available to the Local Authority Inspector on request" | Immediately |
| **And replace with:**<br>"including any faults noted and remedial action taken shall be recorded in the site logbook as described in clause 2.13 above." | Immediately |
| **In Document B, Operational Controls, clause 3.8 after the words**<br>"other equipment" | Immediately |
| **Insert the words**<br>"associated with the surfacer spray booth" | Immediately |
| **Delete the words**<br>"through the use of a closed loop cleaning system" | Immediately |
| **And replace them with:**<br>"using water based cleaners within the spray booth and whilst the wet filtration system is operating." | Immediately |
| **In Document B, Operational Controls, insert new clause 3.8a:**<br>"Residual coating materials contained in parts of the application equipment shall be removed prior to cleaning." | Immediately |
| **In Document B, Operational Controls, insert new clause 3.8b:**<br>"Where practicable, fixed equipment shall be cleaned in-situ, and such equipment shall, where practicable, be kept enclosed whilst cleaning is | Immediately |

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| carried out." | |
| **In Document B, Operational Controls, insert new clause 3.8c:**<br>"Where equipment is cleaned off-line, cleaning shall be carried out using enclosed cleaning systems. These shall be sealed to prevent emissions whilst in operation, except during purging at the end of the cleaning cycle. If this is not possible, emissions shall be contained and vented to abatement plant where necessary." | Immediately |
| **In Document B, Operational Controls, insert new clause 3.8d:**<br>"The application of cleaning solvents shall be from a contained device or automatic system when applied directly (in the case of fixed manufacturing equipment) or dispensed by piston type dispenser or similar contained device when used on wipes." | Immediately |
| **In Document B, Operational Controls, insert new clause 3.8e:**<br>"Cleaning operations involving organic solvents shall be reviewed at least one every two years, to identify opportunities for reducing volatile organic compound emissions. The conclusions of the review shall be submitted to the Regulator in writing within 8 weeks of it taking place." | Immediately |
| **In Document B, Operational Controls, delete clause 3.9.** | Immediately |
| **In Document B, Operational Controls, clause 3.11, delete the full stop after the words**<br>"lidded containers"<br>**And replace with the following:**<br>"and be labelled such that anyone handling them is aware of their contents and hazardous properties." | Immediately<br><br>Immediately |
| **In Document B, Operational Controls, clause 3.13 before the words**<br>"bulk storage tank"<br>**Insert the word**<br>"electrocoat"<br>**After the words**<br>"electrocoat bulk storage tank"<br>**Insert the words**<br>"and delivery connections" | Immediately<br><br>Immediately<br><br>Immediately<br><br>Immediately |
| **In Document B, Operational Controls, re write clause 3.14 to read:**<br>" By 31st October 2007 the connections to the electrocoat bulk storage tank shall be fixed and locked when not in use." | Immediately |
| **In Document B, Operational Controls, delete clauses 3.15 and 3.16.** | Immediately |
| **In Document B, Operational Controls, clause 3.17, delete the words:**<br>"such as spent filters including the carbon filters serving the prototype booth" | Immediately |

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| **In Document B, Operational Controls, insert a new clause 3.18:** "The Operator shall provide the Regulator with a list of key abatement plant and shall have a written plan for dealing with its failure in order to minimise any adverse effects." | Immediately |
| **In Document B, Operational Controls, insert a new clause 3.19:** "When organic solvent is used on wipes:<br>• Pre-impregnated wipes shall be held within a closed container prior to use<br>• Where practicable no organic solvent cleaning fluids or significantly less volatile organic solvents cleaning fluids shall be used (with or without the addition of mechanical, chemical or thermal enhancements)" | Immediately |
| **In Document B, Operational Controls, insert a new clause 3.20:** "By 31st October 2007, prior to disposal, used wipes and other items contaminated with organic solvent shall be placed in a suitably labelled metal bin fitted with a self-closing lid." | Immediately |
| **In Document B, Operational Controls, insert a new clause 3.21:** "All measures shall be taken to minimise the emissions of VOCs during mixing and transfer of materials – for example by the use of closed transfer systems and/or by ensuring that containers are kept covered." | Immediately |
| **In Document B, Operational Controls, insert a new clause 3.22:** "By 31st October 2007 the consumption of coatings / organic solvents against product produced shall be monitored to minimise excess solvent / coating use." | Immediately |
| **In Document B, Operational Controls, insert a new clause 3.23:** " Suitable organic solvent containment and spillage equipment shall be ready available in all organic solvent handling areas." | Immediately |
| **In Document B, Operational Controls, insert a new clause 3.24:** "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." | Immediately |
| **In Document B, Operational Controls, insert a new clause 3.25:** "All appropriate precautions shall be taken to minimise emissions during start-up and shutdown." | Immediately |
| **In Document B, Operational Controls, insert new clause 3.26:** Particulate emissions from the sanding of defective coated surfaces shall be extracted at source and collected into the filter bag dust collection system. Used filter bags shall be changed as required and securely bagged or stored in enclosed containers whilst awaiting disposal. | Immediately<br>I |

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| **In Document B, Stacks, Ducts and Process Exhausts, clause 4.2, after the word:**<br>"downdraught"<br>**Delete the word**<br>"water"<br>**And replace with**<br>"wet"<br>**And after the word**<br>"scrubber"<br>**Insert the words:**<br>"solids entrainment"<br>**And delete the word**<br>"filtration"<br>**And after the words**<br>"within the stack"<br>**Insert the words**<br>"serving the wet-scrubber solids entrainment system"<br>**And after the words**<br>"9m/sec"<br>**Insert the words**<br>"in order to minimise droplet emissions." | Immediately<br><br>Immediately<br><br>Immediately<br><br>Immediately<br><br>Immediately<br><br>Immediately<br><br>Immediately<br><br>Immediately<br><br>Immediately<br><br>Immediately |
| **In Document B, Stacks, Ducts and Process Exhausts, delete clause 4.3.** | Immediately |
| **In Document B, Stacks, Ducts and Process Exhausts, rewrite clause 4.4 to read:**<br>"The spray booth, the electrophoretic dip line, the ovens and their associated stacks and process vents shall be inspected at least once in every 12-month period for damage, wear and tear, accumulations / deposits and correct functioning. Records of such tests including any faults noted and remedial action taken shall be recorded in the site logbook as described in clause 2.13 above." | Immediately |
| **In Document B, Stacks, Ducts and Process Exhausts, insert new clause 4.5:**<br>"Adequate insulation shall be provided on the incinerator stack to minimise the cooling of waste gases and prevent liquid condensation." | Immediately |
| **In Document B, Stacks, Ducts and Process Exhausts, insert new clause 4.6:**<br>"Stacks and ducts shall discharge vertically and shall not have any restrictions such as plates, caps or cowls. The discharge velocity from stacks and ducts shall be sufficient to avoid aerodynamic down wash." | Immediately |
| **In Document B, General Operations, clause 5.1, after the words**<br>"all plant"<br>**Insert the word**<br>"ducts,"<br>**Delete the following phrase** | Immediately<br><br>Immediately<br><br>Immediately |

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| "kept on site and made available to the local authority inspector on request"<br>**And replace with:**<br>"recorded in the site logbook as described in clause 2.13 above. | Immediately |
| **In Document B, General Operations, re write clause 5.3 to read:**<br>"The Operator shall maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment. These documents shall be made available to the Regulator on request" | Immediately |
| **In Document B, General Operations, insert new clause 5.3a:**<br>"The training of all staff with responsibility for operating the activity shall include:<br>• Awareness of their responsibilities under the Permit; in particular how to deal with conditions likely to give rise to emissions, such as in the event of spillage;<br>• Minimising emissions on start up and shut down; and<br>• Action to minimise emissions during abnormal conditions" | Immediately |
| **In Document B, General Operations, delete clauses 5.4 and 5.5.** | Immediately |
| **In Document B, General Operations, insert new clause 5.8:**<br>"Effective preventative maintenance shall be employed on all aspects of the activity including all plant, buildings and the equipment concerned with the control of emissions to air. In particular; a written maintenance programme shall be available to the Regulator with respect to pollution control equipment, and a record of such maintenance shall be made available for inspection by the Regulator." | |
| **In Document B, General Operations, insert new clause 5.9:**<br>"By 30th September 2007 Operators shall put in place some form of structural environmental management system (EMS), whether by adopting published standards (ISO 14001 or the EU Eco Management and Audit Scheme [EMAS]) or by setting up an EMS tailored to the nature and size of the particular process." | Immediately |
| **In Document B, Compliance With Solvent Emissions Regulations, clause 6.1, after the words**<br>"and R61"<br>**Insert the following:**<br>"and formulate and implement a timetable to (by 31st October 2007) replace, control and limit them as defined and agreed by the Regulator."<br>**And delete the following:**<br>"products or materials that are / contain Halogenated VOCs with the risk phrase R40 | Immediately<br><br>Immediately<br><br>Immediately |
| **In Document B, Compliance With Solvent Emissions Regulations,** | Immediately |

**insert new clause 6.1a:**
"The Operator shall identify products or materials that are / contain Halogenated VOCs with the risk phrase R40 and formulate and implement a timetable to (by 31st October 2007) control and limit them as defined and agreed by the Regulator."

Immediately

**In Document B, Compliance With Solvent Emissions Regulations, re write clause 6.2 to read:**
"The Operator shall demonstrate compliance with the Solvent Emissions (England & Wales) Regulations 2004 by 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: and is equivalent to those that would have been achieved if the concentration emission limits had been applied:"

| **Solvent Consumption** | **Existing Installations at 31/10/05** | **Existing Installations at 31/10/07** |
|---|---|---|
| 5 – 15 tonnes | Total mass of solids x0.9 | Total mass of solids x 0.6 |
| 15 tonnes or more | Total Mass of Solid x 0.56 | Total Mass of Solid x 0.37 |

Immediately

**In Document B, Compliance With Solvent Emissions Regulations, the following text shall be referred to as clause 6.2a:**
"An Emission Reduction Plan shall be submitted to the Regulator, which shall include, in particular: Decreases in the average solvent content of the total input and/or increased efficiency in the use of solids to achieve a reduction of the total emissions from the installation."

Immediately

**In Document B, Compliance With Solvent Emissions Regulations, insert new clause 6.3:**
" A determination of the organic solvent consumption, the total mass of organic solvents minus any solvents sent for reuse / recovery off site shall be submitted annually for publication on the Public Register, preferably to coincide with the Operator's stock taking requirements, in the form of a mass balance in order to determine the annual actual consumption of organic solvent. (C). Where: $\mathbf{C = I_1 - O_8}$"

Immediately

**In Document B, Compliance With Solvent Emissions Regulations, insert new clause 6.4:**
"In the event that the Operator considers that solvent consumption data is classed as commercially confidential they shall apply to the Regulator for an exclusion."

Immediately

**In Document B, Compliance With Solvent Emissions Regulations, insert new clause 6.5:**
"A Solvent Management Plan shall be used to determine the actual

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| emissions annually. The definitions used in PG 6/23 shall be used in all calculations relating to the Solvent Management Plan. The Solvent Management Plan shall be submitted to the Regulator annually." | |
| **In Document B, Compliance With Solvent Emissions Regulations, the following shall be referred to as clause 6.6:**<br>"Compliance with the Reduction Scheme is achieved if the annual actual solvent emission determined from the Solvent Management Plan is less than or equal to the Target Emission" | Immediately |
| **At the end of the above, insert the following phrase:**<br>",where the annual actual solvent emission is: **$I_1 - O_8 - O_7 - O_6$ (- $O_5$ if abatement has been used)**" | Immediately |
| **In Document B, Compliance With Solvent Emissions Regulations, insert new clause 6.7:**<br>"The Operator shall not replace existing coating system products with those of a higher solvent content, or introduce high solids formulations which have no beneficial effect on the product but which increase the amount of solids used, except where a reduction in the overall VOC emissions can be demonstrated. The Regulator shall be notified 8 weeks in advance of any proposals to make such changes and the notification shall include reasons why lower organic solvent systems are not considered technically appropriate or practicable." | Immediately |
| **After clause 6.7 insert document C entitled Residual Duty** | Immediately |
| **Replace plan PPC/058/A with amended plan PPC/058/A** | Immediately |

Signed on behalf of Coventry City Council

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[Environmental Health Officer]
An authorised officer of the Council

Date 5th December 2006

Schedule 2

Permit reference [058] as varied by this notice.

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

# DOCUMENT A : PERMIT

**Stadco Coventry Ltd**

**Reference Number PPC/058**



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:

**Stadco Coventry Ltd**

Whose registered office is:

**Stadco Ltd**
**Harlescott Lane**
**Shrewsbury**
**Shropshire**
**SY1 3AS**

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:

**Stadco Coventry Ltd**
**Holbrook Lane**
**Coventry**
**CV6 4AW**

The permit is subject to the conditions specified in this document consisting of 21 pages and comprising documents A, B and C, and plan PPC/058/A.

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

Dated ……

## 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:** **Michelle Muller**
**Permit Checked By:** **Daniel Rowlson**

## 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
- **Regulator** shall mean the body responsible for the enforcement of the conditions contained within this Permit.
- **"m"** means metre
- **"m/s"** means metres per second



The general location, installation boundary and internal layout of the Authorised Process is shown on the attached plan PPC/058/A page 21

**Description of Installation**

Materials containing volatile organic solvents such as coatings, or cleaning solvents, are delivered in sealed containers to the central paint store or directly to their point of use.

Metal components are either coated in the electrophoretic dip area, or the sealer booth depending on the model type.

**Electrophoretic Dip Area**

Metal components are loaded onto an automatic line and cleaned with an alkali degreaser, phosphate spray, cold water rinse and a trivalent chrome rinse. This prepares the components for coating in the dip plant.



Components are then dip painted in a large dipping tank with water based two-component (pigment/resin) paint. Electrophoretic dip painting is a process where by the metal components and the paint are electrically charged at opposite polarities (i.e. positive and negative), thus they are attracted to each other aiding adhesion.

Components are automatically removed from the dip tank and the paint dried ("stoved") at a metal temperature of 180°C in the stoving ovens. The emissions from the stoving oven are passed through a gas-fired incinerator before discharge to atmosphere.

**Tedak Operations**

A percentage of the E-coated product passes through this facility i.e. taxi and MG body shells. These products are inspected for any defects i.e. dirt, E-Coat drips and contamination. If any defects are identified, they are repaired using an orbital sander. All areas that have broken through to bare metal are then repaired using an etch primer.

**Surfacer Spraying Area (Sealer Booth)**

Metal components are loaded onto an automatic line and manually sprayed within the Surfacer Spray booth employing hot airless electrostatic spraying techniques. Again this technique uses opposite polarity charging to attract the paint particles to the component, in order to aid adhesion. The paint products used are water based.

Particulates from the paint spraying process are entrained in treated circulating water using a wet scrubber system.

Following spraying, the components are automatically transferred to the curing ovens to be heated to a metal temperature around 150°C to 160°C. The exhausted air is discharged direct to atmosphere.

**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 | None | None | None |
| 2 | Electrophoretic Dip Plant | VOC's | None | None |
| 3 | Stoving Oven | VOC's | None | None |
| 4 | Incinerator (abatement plant) | Nitrogen oxides<br>VOC's<br>Carbon monoxide | 1.4 | |
| 5 | Surfacer booth | Particulates<br>VOC's | 1.4 | Wet filtration system |
| 6 | Curing Oven | VOC's | None | None |
| Deleted | | | | |
| 8 | Tedak Area | VOCs and particulates | None | Vacuum plant |

**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 Regulator.

1.2 There shall be no emissions of particulate matter noticeable beyond the installation boundary.

1.2a Emissions shall be free from visible smoke, free from droplets, and except in the case of water vapour shall be free from visible emissions.



1.3 Deleted

1.3a Emissions from combustion processes shall, during normal operations be free from visible smoke and in any case shall not exceed the equivalent of Ringlemann Shade 1 as described in British Standard BS 2742: 1969

1.3b In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions, or adverse results from any monitoring activity the Operator must investigate the cause immediately and undertake corrective action. A record of events shall be made in the site logbook described in Clause 2.13 below. If the emission is likely to affect the local community, or if it is as a result of the failure of key arrestment plant, then the Regulator must be informed immediately.

1.3c In cases of non-compliance causing immediate danger to human health, operation of the activity shall be suspended. All of the following criteria shall be taken into account:

- The toxicity and amount of the substances being released
- The location of the installation; and
- The sensitivity of the receptors

1.4 The following emission limits shall not be exceeded:

a) Total particulate matter from the surfacer spray booths: 50mg/$Nm^3$ (as a 30 minute mean)

b) Carbon monoxide from the electrocoat oven incinerator: 100mg/$Nm^3$ (as a 30 minute mean)

c) Nitrogen oxides (measured as nitrogen dioxide) from the electrocoat oven incinerator: 100mg/$Nm^3$ (as a 30 minute mean)

d) Deleted

The reference conditions for emission limits are 273.15K, 101.3Kpa, without correction for water vapour.

1.5 The introduction of dilution air to achieve the emission concentration limits in this Permit is not permitted. Exhaust flow rates shall be consistent with the efficient capture of emissions.

1.6 All coatings shall be applied using airless electrostatic spraying techniques or the electrophoretic dip plant.

1.7 By 31st October 2007 the tank containing electrocoat resin shall be enclosed as far as possible to minimise breathing losses. Where practicable it shall be back vented to the delivery tank during filling. Where this is impracticable, displaced air shall be vented in such a way as to prevent offensive odours being detected off site.



1.8 By 31st October 2007 all potentially odorous waste materials shall be stored in suitable closed containers or bulk storage vessels, where appropriate vented to suitable arrestment plant.

1.9 Coatings containing VOC shall be stored in closed storage containers to minimise emissions of VOCs.

1.10 All processes / activities shall use fuel containing not more than 1% wt/wt sulphur in fuel. Where gas oil is used it shall contain not more than 0.2% wt/wt sulphur in fuel until 31st December 2007 and after that date not more than 0.1% wt/wt sulphur in fuel. Evidence shall be demonstrated of compliance with this Clause by making available to the Regulator copies of the certification from the supplier using test method ASTM D86 distillation.

1.11 Waste materials that are likely to contain particulate matter shall be stored in sealed bags or containers whilst awaiting disposal.

## 2.0 MONITORING, SAMPLING AND MEASUREMENT OF EMISSIONS

2.1 Emissions monitoring shall not take place without prior approval from the Regulator.

2.2 The Regulator shall be notified at least 14 days in advance of any monitoring to demonstrate compliance with clause 1.4. This notification

shall include the proposed date and time of monitoring, the pollutants to be tested for, and the methods to be used.

2.3 The results of non-continuous emissions monitoring to comply with clause 1.4 (a) to (c) shall be submitted to the Regulator electronically within 8 weeks of the sampling taking place.

2.4 Deleted

2.5 The incineration temperature of the electrocoat oven incinerator shall be continuously monitored. The temperature of the incinerator shall remain above 700°C subject to the monitoring results obtained in respect of clause 2.6b below.

2.6 The continuous temperature monitoring equipment serving the electrocoat oven incinerator shall be used as a surrogate measure to demonstrate the adequate destruction of VOCs. It shall be calibrated to ensure correct functioning at least once in every 12-month period. Records of this calibration shall be retained on site for a minimum of 2 years and shall be made available to the Regulator on request.



2.6a The continuous temperature monitoring readings shall be on display to appropriately trained operating staff. The instruments shall be fitted with audible and visual alarms, situated appropriately to warn the Operator of abatement plant failure or malfunction. The monitor shall be set to provide a baseline output when the plant is known to be operating under the best possible conditions. An output level shall be set at approximately 75% of the theoretical emission limit (calculated as part of the solvent management plan) to trigger an alarm. The activation of such alarms shall be automatically recorded.

2.6b Emissions of VOC (expressed as mass concentration of total gaseous organic carbon) from the electrocoat oven incinerator shall be monitored annually in order to assess the amount of VOCs emitted from the exhaust stack following abatement. This data shall be used to assess whether the installation complies with the target emission value in Clause 6.2, and shall also be used to set an efficient temperature for the destruction of VOCs. The continuous flame ionisation detector method EN 13526 shall be used and at least three readings must be obtained during each measurement exercise.

2.6c All new continuous monitoring equipment shall be designed for less than 5% downtime over any 3-month period.

2.7 Emissions from the surfacer spray booth shall be tested for total particulate matter at least once a year in accordance with the main

procedural requirements of BS ISO 9096:2003 to demonstrate compliance with Clause 1.4 (a) above.

2.8 Emissions from the electrocoat oven incinerator shall be tested for carbon monoxide and nitrogen oxides at least once a year to demonstrate compliance with Clause 1.4 (b) and (c). The following standards shall be used: ISO 12039 and ISO 10849 respectively.

2.9 Deleted

2.10 Deleted

2.11 The Operator shall ensure that adequate facilities for sampling are provided on vents and ducts. Sampling points on all new plant shall be designed to comply with the relevant British or equivalent standard.

2.12 No monitoring result shall exceed the emission concentration limits specified, except where either:

(b) Data is obtained over at least 5 sampling hours in increments of 30-minutes or less; or

(b) At least 20 results are obtained where sampling time increments of more than 30-minutes are involved; AND in the case of (a) or (b)

(c) No daily mean of all 30-minute mean emission concentrations shall exceed the specified emissions concentrations limits during normal operation (excluding start up and shut down); and

(d) No 30-minute mean emission concentration shall exceed twice the specified emission concentration limits during normal operation (excluding start up and shut down).



2.13 The Operator shall keep records of inspections, tests and monitoring, including all non-continuous monitoring, inspections and visual assessments. The records shall be kept on site by the Operator for a period of at least two years and shall be made available to the Regulator to examine on request. This shall be known as the site logbook.

## 3.0 OPERATIONAL CONTROLS

3.1 Deleted

3.2 The liquor of the wet scrubber solids entrainment system serving the surfacer spray booth shall be continually dosed automatically with anti-foaming, coagulation and flocculation agents in accordance with the manufacturers instructions.

3.3 Any fresh water used to replace the liquor of the wet scrubber solids entrainment system serving the surfacer spray booth shall be dosed with anti-foaming, coagulation and flocculation agents in accordance with the manufacturers instructions prior to its use.

3.4 The level of the liquor in the wet -scrubber solids entrainment system serving the surfacer spray booth shall be manually checked once per day and manually increased if the liquor level is below the level required for correct working order of the scrubber. The manual checks and any water additions made shall be recorded in the site logbook as described in clause 2.13 above.

3.5 The circulation of the liquor in the wet scrubber solids entrainment system serving the surfacer spray booth shall be continually monitored. In the event of pump failure, an audible alarm shall be activated and the spraying of coatings shall cease and not recommence until the cause of the failure has been identified and remedied. Details of any such failures, the cause of the failure and the remedial action taken shall be recorded in the site logbook as described in clause 2.13 above.

3.6 Deleted

3.7 The automatic shutdown and alarm systems of the wet scrubber serving the surfacer spray booth shall be tested for correct working order at least once every 4 weeks. Records of such tests including any faults noted and remedial action taken shall be recorded in the site logbook as described in clause 2.13 above.



3.8 The cleaning of spray guns and other equipment associated with the surfacer spray booth shall only be carried out using water based cleaners within the spray booth and whilst the wet filtration system is operating.

3.8a Residual coating materials contained in parts of the application equipment shall be removed prior to cleaning.

3.8b Where practicable, fixed equipment shall be cleaned in-situ, and such equipment shall, where practicable, be kept enclosed whilst cleaning is carried out.

3.8c Where equipment is cleaned off-line, cleaning shall be carried out using enclosed cleaning systems. These shall be sealed to prevent emissions whilst in operation, except during purging at the end of the cleaning cycle. If this is not possible, emissions shall be contained and vented to abatement plant where necessary.

3.8d The application of cleaning solvents shall be from a contained device or automatic system when applied directly (in the case of fixed manufacturing equipment) or dispensed by piston type dispenser or similar contained device when used on wipes.

3.8e Cleaning operations involving organic solvents shall be reviewed at least one every two years, to identify opportunities for reducing volatile organic compound emissions. The conclusions of the review shall be submitted to the Regulator in writing within 8 weeks of it taking place.

3.9 Deleted

3.10 Spraying of components shall only be carried out in the dedicated spray booth.

3.11 The amount of residual organic solvent bearing material left in drums and other containers shall be minimised. All full, or nominally empty containers which hold or have held materials which contain organic solvents shall be stored closed in the central paint store, local paint mixing rooms or the wash store. All containers that hold or have held diluents or cleaning solvents must have lidded containers and be labelled such that anyone handling them is aware of their contents and hazardous properties.

The bulk storage tank for electrocoat resin shall be fitted with a tank contents measuring device, a visual level indicator and a high level alarm to warn of overfilling. Deliveries of electrocoat resin shall only be undertaken in the presence of a competent person.

3.12 The electrocoat bulk storage tank and delivery connections shall be sited over an impervious bund capable of holding 110% of the capacity of the storage tank.

3.13 By 31st October 2007 the connections to the electrocoat bulk storage tank shall be fixed and locked when not in use.

3.14 Deleted

3.15 Deleted



3.16 Waste materials that are likely to contain particulate matter shall be stored in sealed bags or containers whilst awaiting disposal.

3.18 The Operator shall provide the Regulator with a list of key abatement plant and shall have a written plan for dealing with its failure in order to minimise any adverse effects.

3.19 When organic solvent is used on wipes:

- Pre-impregnated wipes shall be held within a closed container prior to use

- Where practicable no organic solvent cleaning fluids or significantly less volatile organic solvents cleaning fluids shall be used (with or without the addition of mechanical, chemical or thermal enhancements)

3.20 By 31st October 2007, prior to disposal, used wipes and other items contaminated with organic solvent shall be placed in a suitably labelled metal bin fitted with a self-closing lid.

3.21 All measures shall be taken to minimise the emissions of VOCs during mixing and transfer of materials – for example by the use of closed transfer systems and/or by ensuring that containers are kept covered.

3.22 By 31st October 2007 the consumption of coatings / organic solvents against product produced shall be monitored to minimise excess solvent / coating use.

3.23 Suitable organic solvent containment and spillage equipment shall be ready available in all organic solvent handling areas.

3.24 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.

3.25 All appropriate precautions shall be taken to minimise emissions during start-up and shutdown.

3.26 Particulate emissions from the sanding of defective coated surfaces shall be extracted at source and collected into the filter bag dust collection system. Used filter bags shall be changed as required and securely bagged or stored in enclosed containers whilst awaiting disposal.



## 4.0 STACKS, DUCTS AND PROCESS VENTS

4.1 Emissions from the electrophoretic primer dip stoving oven shall only be emitted via the incinerator.

4.2 Emissions from the spraying of coatings in the surfacer spray booth shall only be emitted to atmosphere via the downdraught wet-scrubber solids entrainment system. Emissions from the 'flashing off' of components shall only be emitted via the proper process exhausts. The height of the final discharge point shall be 3m above roof ridge. The linear velocity within the stack serving the wet-scrubber solids entrainment system shall not exceed 9m/sec in order to minimise droplet emissions.

4.3 Deleted

4.4 The spray booth, the electrophoretic dip line, the ovens and their associated stacks and process vents shall be inspected at least once in every 12-month period for damage, wear and tear, accumulations / deposits and correct functioning. Records of such tests including any faults noted and remedial action taken shall be recorded in the site logbook as described in clause 2.13 above.

4.5 Adequate insulation shall be provided on the incinerator stack to minimise the cooling of waste gases and prevent liquid condensation.

4.6 Stacks and ducts shall discharge vertically and shall not have any restrictions such as plates, caps or cowls. The discharge velocity from stacks and ducts shall be sufficient to avoid aerodynamic down wash.

## 5.0 GENERAL OPERATIONS

5.1 The Operator shall undertake regular cleaning and preventative maintenance including inspection and repair/replacement on all plant, ducts, 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 recorded in the site logbook as described in clause 2.13 above.

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 The Operator shall maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment. These documents shall be made available to the Regulator on request.

5.3a The training of all staff with responsibility for operating the activity shall include:

- Awareness of their responsibilities under the Permit; in particular how to deal with conditions likely to give rise to emissions, such as in the event of spillage;
- Minimising emissions on start up and shut down; and
- Action to minimise emissions during abnormal conditions

5.4 Deleted

5.5 Deleted

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.

5.8 Effective preventative maintenance shall be employed on all aspects of the activity including all plant, buildings and the equipment concerned with the control of emissions to air. In particular; a written maintenance programme shall be available to the Regulator with respect to pollution control equipment, and a record of such maintenance shall be made available for inspection by the Regulator.

5.9 By 30th September 2007 Operators shall put in place some form of structural environmental management system (EMS), whether by adopting published standards (ISO 14001 or the EU Eco Management and Audit Scheme [EMAS]) or by setting up an EMS tailored to the nature and size of the particular process.



## 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 (by 31st October 2007) replace, control and limit them as defined and agreed by the Regulator.

6.1a The Operator shall identify products or materials that are / contain Halogenated VOCs with the risk phrase R40 and formulate and implement a timetable to (by 31st October 2007) control and limit them as defined and agreed by the Regulator.

6.2 The Operator shall demonstrate compliance with the Solvent Emissions (England & Wales) Regulations 2004 by 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: and is equivalent to those that would have been achieved if the concentration emission limits had been applied:

| **Solvent Consumption** | **Existing Installations at 31/10/05** | **Existing Installations at 31/10/07** |
|---|---|---|
| 5 – 15 tonnes | Total mass of solids x0.9 | Total mass of solids x 0.6 |
| 15 tonnes or more | Total Mass of Solid x 0.56 | Total Mass of Solid x 0.37 |

6.2a An Emission Reduction Plan shall be submitted to the Regulator, which shall include, in particular: Decreases in the average solvent content of the total input and/or increased efficiency in the use of solids to achieve a reduction of the total emissions from the installation.

6.3 A determination of the organic solvent consumption, the total mass of organic solvents minus any solvents sent for reuse / recovery off site shall be submitted annually for publication on the Public Register, preferably to coincide with the Operator's stock taking requirements, in the form of a mass balance in order to determine the annual actual consumption of organic solvent. (C). Where: $\mathbf{C = I_1 - O_8}$

6.4 In the event that the Operator considers that solvent consumption data is classed as commercially confidential they shall apply to the Regulator for an exclusion.



6.5 A Solvent Management Plan shall be used to determine the actual emissions annually. The definitions used in PG 6/23 shall be used in all calculations relating to the Solvent Management Plan. The Solvent Management Plan shall be submitted to the Regulator annually.

6.6 Compliance with the Reduction Scheme is achieved if the annual actual solvent emission determined from the Solvent Management Plan is less than or equal to the Target Emission, where the annual actual solvent emission is: $\mathbf{I_1 - O_8 - O_7 - O_6 (- O_5}$ **if abatement has been used)**

6.7 The Operator shall not replace existing coating system products with those of a higher solvent content, or introduce high solids formulations which have no beneficial effect on the product but which increase the amount of solids used, except where a reduction in the overall VOC emissions can be demonstrated. The Regulator shall be notified 8 weeks in advance of any proposals to make such changes and the notification shall include reasons why lower organic solvent systems are not considered technically appropriate or practicable.

# 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/ 058 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 he 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.

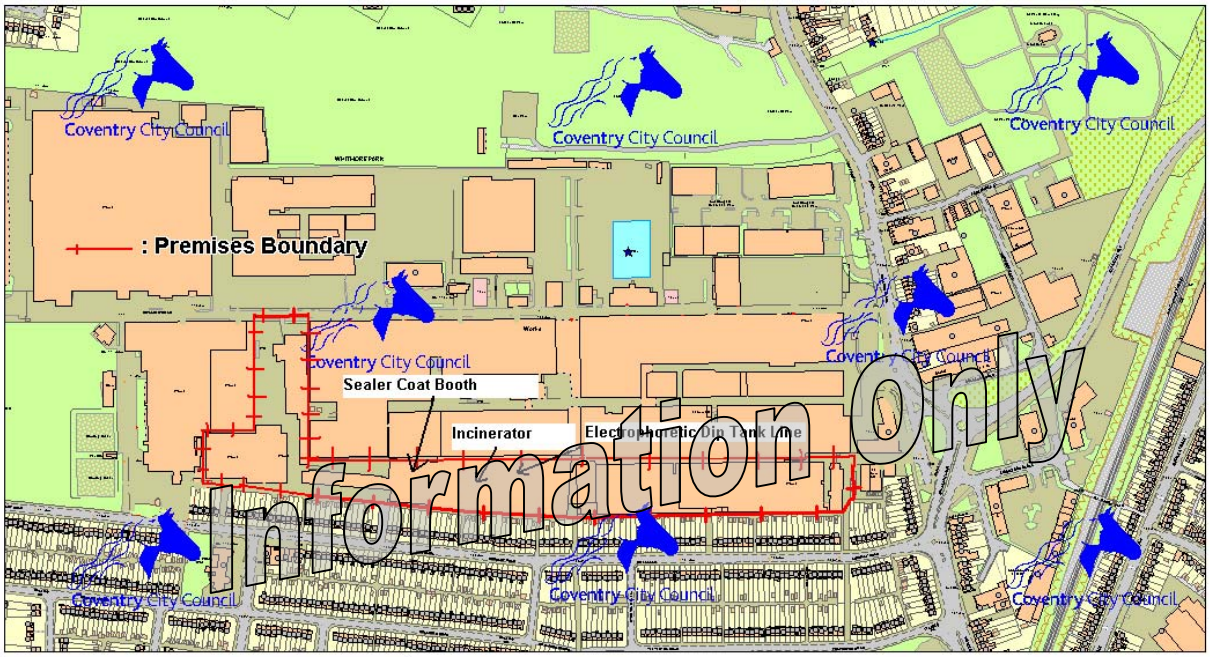
Protocols ensure that the sampling procedures are carried out correctly and that the results obtained accurately characterise the process.

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.

## Plan PPC/058/A Premises Boundary of Stadco Coventry Ltd




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

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# Guidance for Operators receiving a Variation Notice

(This guidance does not form part of the Variation Notice, but it is for the guidance of those served with the notice).

## Dealing with Variation Notice

This notice varies the terms of the permit specified in the Notice by amending or deleting certain existing conditions and/or adding new conditions. The Schedule attached to the notice explain which conditions have been amended, added or deleted and the dates on which these have effect.

The Council may have included a 'consolidated permit' which takes into account these and / or previous variations. In cases where a consolidated permit is not included this variation notice must be read in conjunction with your permit document.

## Offences

Failure to comply
With a variation notice 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 improvement for a team not exceeding 6 months or both; or (ii) to a fine or imprisonment for a term not exceeding 5 years or both, depending on whether the matter is dealt with in Magistrates Court or Crown Court.

## Appeals

Under regulation 27(2) of the 2000 Regulations operators have the right to appeal against a suspension notice. The right to appeal does not apply in circumstances where the notice implements a direction of the 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 applications for permits) or 6(6) of Schedule 7 (directions determining variation of permits).

Appeals against a variation notice do not have the effect of suspending operation of the notice. Appeals do not have the affect of suspending permit conditions, or any of the mentioned notices.

Notice of appeal against a variation notice must be given within two months of the date of the notice, which is the subject matter or the appeal. The secretary of State may in a 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 changes 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 claimed 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.

## Commercial Confidentiality

An operator may request certain information to remain confidential i.e. not be placed on the public register. The operator must request the exclusion from the public register of commercially confidential information at the time of supply of the information requested by this notice or any other notice. The operator should provide clear justification for each item wishing to be kept from the register. The amount of information excluded from the register should be kept to the minimum necessary to safeguard the operator's commercial advantage. It may assist the local authority if the information the operator considers to be commercially confidential is submitted in a way which will allow it to be easily removed should the claim be granted, for example on separate pages, marked 'claimed confidential'. The onus is on the operator to provide a clear justification for each item to be kept from the register. It will not simply be sufficient to the say that the process is a trade secret.

The general principle is that information should be freely available to the public. Information that maybe considered commercially confidential is that which if it "were being contained within the register would prejudice to an unreasonable degree the commercial interests of an individual or any other person2 (regulation 31(12) of the 2000 Regulations).

Local Authorities will also take into account whether the information at issue could be obtained or inferred from other publicly accessible sources.

The local authority will determine this request within 28 days of the date of such an application and will issue a Determination Notice detailing their decision. The notice may specify a time period over which the information is to remain commercially confidential (if not specified, it will be four years beginning with the date of the determination). The operator may appeal to the Secretary of State within 21 days of the notification of the decision.

If the application is granted the local authority will place a statement on the public register stating that certain information has been withheld and stating the reason why, plus whether the information is relevant to a permit condition, and whether the permit condition has been complied with.

The local authority may consider that certain areas of the information are commercially confidential, and others are not. If this is the case it will be stated in the determination notice. The operator may appeal against this in the normal manner.

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

**National Security**

Information may be excluded from the public register on the grounds of National Security. If it is considered that the inclusion of information on a public register is contrary to the interests of national security, the operator may apply to the Secretary of State, specifying the information and indicating the apparent nature of risk to national security. The operator must inform the local authority of such an application, who will not include the information on the public register until the Secretary of State has decided the matter.