PPC Permit ref:**082**
Variation ref:**001**

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

Variation Notice

To: **Mr M Taylor**
Wyndon Motors Keresley Ltd
1 Shopping Way
Sandpits Lane
Keresley
Coventry
CV6 2FR

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 **PPC 082** granted under regulation 9(1) of the 2000 Regulations in respect of the operation of a Part B installation involving a coating activity at:

Wyndon Motors Keresley Ltd
1 Shopping Way
Sandpits Lane
Keresley
Coventry
CV6 2FR

The variation of the conditions of the permit and date 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……..
[Position]
An authorised officer of the Council

PPC Permit ref: **082**

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

Variation ref: **001**

Schedule 1

Variation to the conditions Of the permit	**Dates on which the variation Is to take place**
In Document B of the permit, condition 1.2, delete the words 'PG6/34 (97) as amended' and replace with 'PG6/34(04) as amended'.	Immediately
In Document B of the permit, condition 1.6, delete '10mg/m^3' and replace with '10mg/Nm^3'.	Immediately
In Document B of the permit, delete condition 2.3.	Immediately
In Document B of the permit, condition 2.4, delete the words 'described in clause 2.3'.	Immediately
In Document B of the permit, condition 2.12, delete the words 'described in clause 2.3'.	Immediately
In Document B of the permit, delete existing condition 5.1 and replace with new condition 5.1 'Effective preventative maintenance shall be employed on all aspects of the activity including all plant, buildings and 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.'	Immediately
In Document B of the permit, delete condition 5.3 and replace with the following which shall constitute condition 5.8 '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 of the permit, after condition 5.8 insert the following condition which will constitute condition 5.9 '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.'	Immediately
In Document B of the permit, after condition 5.9 insert the following which will constitute condition 5.10 'Operators shall put in place some form of structured 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

Signed on behalf of Coventry City Council

……
Date…….
[position]
An authorised officer of the Council

Schedule 2

PPC Permit ref: **082**
Variation ref: **001**

Permit reference **082** as varied by this notice

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

DOCUMENT A : PERMIT

Wyndon Motors

Reference Number **PPC/082**

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:

Wyndon Motors Keresley Ltd

Whose registered office is:

Wyndon Motors Keresley Ltd
1 Shopping Way
Sandpits Lane
Keresley
Coventry
CV6 2FR

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:

Wyndon Motors Keresley Ltd
1 Shopping Way
Sandpits Lane
Keresley
Coventry
CV6 2FR

The permit is subject to the conditions specified in this document consisting of 16 pages and comprising documents A, B and C, plans PPC/082/A and PPC/082/B and Appendix 1.

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 Respraying of Road Vehicles PG 6/34 (04)
- 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:	Phil Parkes

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 (e.g. 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 premises and the installation boundary are marked in red on the attached plan PPC/082/A page 15. The internal layout of the paint shop is shown on the attached plan PPC/082/B page 16.

1.0 DESCRIPTION OF PROCESS

1.1 This permit is for the re-spraying of motor vehicles, as prescribed in Schedule 1, Section 6.4 (B)(b) of the Pollution Prevention and Control (England and Wales) Regulations 2000 (as amended) within the site and process boundaries, as shown on the attached plan marked PPC/082/A, where the process boundary is outlined in red. The process consists of the following stages:

The majority of work undertaken is the repair of crash-damaged passenger cars and light commercial vans. Electric arc welding fumes, and dust from the sanding of body fillers is extracted at source. Following any necessary structural repairs, the vehicle is prepared for painting by masking with paper and adhesive tape.

Paint, diluents and cleaning solvents are delivered to and stored in the paint mixing room as shown on the plan marked PPC/082/B.Vehicles are painted in either the Spraybake Spray Booth or one of the two Burntwood spray booths. The paint is mixed using electronic equipment in the ventilated mixing room which has sealed, self closing doors to prevent fugitive emissions of solvent escaping into the workshop.

Paint is applied using High Velocity Low Pressure (HVLP) sprayguns, which are either suction or gravity fed.

Following painting, there is an initial 'flash off' period after which the extraction rate of the booth is reduced and the air re-circulated through the booth heating system. The usual baking period is 40 minutes at 80° C. When the vehicle is cool, the masking is removed and it is removed from the booth.

The extracted air from the spraybooths is discharged via stainless steel flues pipe to two stacks on the roof of the building labelled "A" (Spraybake booth) and "B" (Burntwood booth) on the attached plan marked PPC/082/B.

Prior to cleaning, the sprayguns are drained of all unused paint. The receptacle is a sealable drum which, when full is removed by a specialist licensed contractor, for recycling. After use the guns are cleaned in a totally-enclosed machine which recirculates the cleaning solvent. The spray guns are partly stripped and the components placed over the cleaning nozzles within the gun washer. An air-operated pump recirculates the solvent through the nozzles, thus effecting the cleaning. At the end of the cycle a small amount of thinners is used as a final rinse and blown through the gun. The waste solvent from this process is recycled directly by the company, using a solvent reclaiming machine.

Empty containers and drums that have contained organic solvents, and waste contaminated with organic solvent is collected by licensed waste carriers.

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	Preparation Area	Particulates	**No visible emissions**	Dry backed filter system
2	Spraybooths	VOCs, Isocyanates and particulates	10 mg/m^3 for particulates	Dry backed filter system
3	Mixing Area	VOCs, Isocyanates	No emission limit (control by the use of compliant coatings)	None required

DOCUMENT B

CONDITIONS

All conditions shall have immediate effect unless stated otherwise.

Note to Operator: Following guidance issued by Defra in AQ Note 31(04) "Vehicle Refinishing: Further guidance on the impact of the new EU 'Paints' Directive" The conditions contained in this permit do not incorporate the provisions of the Solvent Emissions Directive (SED). This permit will need to be varied by this Authority to incorporate the new requirements once guidance has been received.

1.0 EMISSION LIMITS AND CONTROLS

1.1 All emissions to air shall be free from offensive odours outside the process boundary, as perceived by the Local Authority Inspector.

1.2 All paint, diluents and cleaning solvents used in conjunction with the process shall comply with the solvent specifications of clause 32 of the Secretary of States Guidance Note on the respraying of Road Vehicles PG6/34(04) as amended.

1.3 There shall be no visible emissions of particulate matter noticeable beyond the process boundary.

1.4 All paint spraying operations shall be carried out in a enclosed booth so as to prevent fugitive emissions of odour and particulate matter. The Spraybake and Burntwood booths shall have automatic means to prevent spraying operations from continuing in the event of positive pressure within the booth.

1.5 All emissions to air, other than steam or condensed water vapour, should be free from droplets and from persistent mist and persistent fumes.

1.6 The concentration of the total particulate matter in the fume discharge to air from the Spraybake and Burntwood spraybooths shall not exceed 10mg/Nm^3.

1.7 The use of gas oil as a fuel in the process is only permitted if the sulphur content of the fuel is 0.2% from the date of issue of this permit, and 0.1% by 1st January 2008.

2.0 MONITORING, SAMPLING AND MEASUREMENT OF EMISSIONS

2.1 A visual assessment of particulate emissions from the spray booths shall be carried out at least once a day while spraying operations are in progress. This shall be carried out by making an assessment of paint and deposits beyond the process boundary.

2.2 An olfactory assessment of emissions of volatile organic compounds shall be carried out around the process boundary where accessible and outside at the rear of the administrative office.

2.3 Deleted

2.4 The results of monitoring to comply with clauses 2.1 and 2.2 shall be recorded in the site logbook. This shall include the date, time, wind strength and direction, the name of the observer and an assessment of the emission and any corrective action taken, with this also being recorded in the log book.

2.5 A detailed record shall be kept of all organic solvents used in the process, including cleaning and dilutent solvents and solvents contained within coatings themselves. The record shall be forwarded to the Local Authority every twelve months and shall include the following information:-

a. the name of the product and the product type according to the categories outlined in paragraph 5.6 of the Secretary of States' Guidance Note PG6/34 (04)

b. the total amount of solvent in each product.

c. the total amount of product used in the previous 12 month period.

d. the total amount of solvent used in the previous 12 month period.

2.6 To demonstrate compliance with clause 1.6 the operator shall either:-

a. provide manufacturer's guarantees and test data to demonstrate the Spraybake and Burntwood spraybooths meet the required emission concentration limit or

b. in the absence of such guarantees and test data carry out emissions monitoring on the final discharge from the stacks of the Spraybake and Burntwood spraybooths.

2.7 Monitoring to demonstrate compliance with clause 1.6 shall take place once a year in accordance with the main procedural requirements of BS ISO 9096:2003 with averages taken over operating periods excluding start-up, shutdown and periods with no spraying.

2.8 At least 7 days before monitoring takes place to demonstrate compliance with clause 1.6 the operator shall notify this Local Authority of the provisional time and date of monitoring the pollutants to be tested for and the methods to be used.

2.9 The operator shall ensure that adequate facilities are provided for sampling of stacks and ducts.

2.10 Monitoring to demonstrate compliance with clause 1.6 shall not take place without prior approval from this authority.

2.11 The results of the emissions monitoring required by clause 2.6 shall be submitted to the local authority in writing within 8 weeks of the monitoring taking place.

2.12 Adverse results from any monitoring activity shall be investigated by the operator as soon as the monitoring data has been obtained / received. The cause shall be identified, and this, along with any corrective action taken shall be recorded in the site logbook.

3.0 OPERATIONAL CONTROLS

3.1 The cleaning of spray guns and other equipment shall only be carried out in the totally enclosed machine which recirculates the cleaning solvent in the gun cleaning room as shown on the attached plan numbered PPC/082/B.

3.2 The mixing of paint shall only be carried out in the area marked 'mixing room' as shown on the attached plan numbered PPC/082/B.

3.3 Spray gun testing, following cleaning shall only be carried out in the spray booths that are shown on the attached plan numbered PPC/082/B. This shall only be undertaken while the spray booths are in proper working order.

3.4 Paint spraying shall only be carried out in the spray booths and these must be in proper working order.

3.5 All full and partially full containers that hold or have held materials that contain organic solvents must be stored in the paint mixing room and be lidded.

4.0 STACKS, DUCTS AND PROCESS VENTS

4.1 Emissions from the spraying or curing of coatings in the two paint booths shall only be emitted to atmosphere via the dry filtration system.

4.2 The height of the final discharge point for the stacks serving the Spraybake and Burntwood spraybooth shall be 3 m above the roof ridge.

5.0 GENERAL OPERATIONS

5.1 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.

5.2 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 Deleted

5.4 Any malfunction of plant or spillage of solvent-based materials shall be remedied as soon as possible and process operations altered whilst the necessary work is undertaken.

5.5 Any incident likely to give rise to adverse atmospheric emissions or emissions that may have an impact on the local community shall be notified to the local authority immediately, and the details of incident including remedial action taken recorded in the process log book.

5.6 The operator shall make available on demand and without charge any of the records required to be kept by this permit.

5.7 If there is any intention to change any aspect of the prescribed installation from the description contained in the beginning of this permit, or any other aspect which may affect the substances or concentration or amount of substances being emitted to atmosphere, the operator shall notify the regulator of the proposed changes at least 4 weeks in advance before the changes take place.

5.8 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.

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

a. 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;
b. Minimising emissions on start up and shut down; and
c. Action to minimise emissions during abnormal conditions.

5.10 Operators shall put in place some form of structured 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.

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/082 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. Such an application shall be accompanied by the permit and any fee prescribed in respect of the transfer.

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

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

Variation to Permits

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

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

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

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

Substantial Change

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

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

Noise

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

Appeals

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

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

HMSO Publications

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

Emission Monitoring Protocol

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

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

The main components of a Protocol are as follows:-

1. Calibre and quality of the sampling team.
2. A reference measurement method (standard methods may not always be available)
3. A standard methodology setting out:

- health and safety considerations
- pollutants of interest
- plant operating conditions required
- selection and location of sampling position
- sampling characteristics (e.g. isokinetic etc) and techniques
- sampling frequency
- sampling duration
- number of samples
- type (including make and model), condition and suitability of sampling equipment
- required accuracy
- variability of emissions
- analytical methods including laboratory competence and NAMAS accreditation certificate copy for each pollutant of interest

- analytical precision
- procedures to be adopted if standard methods unavailable
- calibration certificate(s) for sampling equipment
- Quality Control and Quality Assurance procedures
- Presentation of results and associated information