Coventry City Council

Environmental Protection Act 1990, Sections 12 (1)

Notice of Revocation

To: The Company Secretary
Faurecia Midlands Ltd
PO Box 200
Humber Road
Coventry
CV3 1LU

Coventry City Council ('the council'), in exercise of the powers conferred on it by section 12 of the Environmental Protection Act 1990 ('the Act'), hereby gives you notice as follows:

1. The authorisation reference 035 for the coating of metal and plastics at Faurecia Midlands Ltd, PO Box 200, Humber Road, Coventry is hereby revoked from 30th April 2005.

Signed on behalf of Coventry City Council

.....
Head of Environmental Health

Date 30/3/05

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

DOCUMENT A : PERMIT

Faurecia Midlands Ltd

Reference Number **PPC/035**

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:

Faurecia Midlands Ltd

Whose registered office is:

PO Box 200
Humber Road
Coventry
CV3 1LU

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:

PO Box 200
Humber Road
Coventry
CV3 1LU

Ordnance Survey Reference .....

The permit is subject to the conditions specified in this document consisting of 15 pages and comprising documents A, B and C, plans PPC/035/A, PPC/035/C and PPC/036/C 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 PG6/23(97) – The Coating of Metal and Plastic.
- Secretary of State's Guidance – General Guidance Manual on Policy and Procedures for A2 and B installations. ISBN 0-85521-028-1

Date Annual Fee Required:	1st April of each financial year
Date For Full Compliance:	Date permit issued
Permit Prepared By:	Rachel King
Permit Checked By:	Susan Simmons

LEGISLATION

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

BRIEF DESCRIPTION OF THE INSTALLATION REGULATED BY THIS PERMIT

Definitions referred to in this permit

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

The general location of the Authorised Process is marked in red on the attached plan PPC/035/A page 9. The Installation boundary is marked in red on the attached plan PPC/035/C page 10. The internal layout of the paint shop is shown on the attached plan PPC/035/C page 11.

Description of Installation
The installation compromises the application of coatings to automobile components on an automated track system.

Bulk containers of coatings and organic solvent materials are delivered by road and forklift trucks to the storage area marked on plan PPC/035/C.

Coatings are prepared in the area marked on plan PPC/035/C by the mixing of a tint/colour with base materials to produce a ready to use coating. The ratio of tint/colour to base materials is determined by internal company specifications and manually weighed/determined in the preparation area before combination.

Components are sometimes flamed to aid paint adhesion. This takes place in the flaming booth marked on plan PPC/035/C using robotic arms that position a gas fired flame in set locations to heat the required area of the component for a set duration.

Components are then manually loaded onto the automated track system.

Components are cleaned using organic solvents dispensed onto wiping clothes via manually operated dispensers in the cleaning booth marked on plan PPC/035/C.

Components are then transferred into the paint booth marked on plan PPC/035/C where the coatings are applied to the components using high-volume-low-pressure sprayguns. Coatings are transferred automatically to the guns for application via a system of enclosed pipework.

Following coating the components are transferred to a gas fired drying oven shown on plan PPC/035/C, where they remain for a set duration according to the component. TEMP?

Components are then air cooled in the cooling area before being manually unloaded.

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	Flaming booth	None controlled via permit	None	None
2	Cleaning booth	VOC's	None	None
3	Coating Preparation	VOC's	None	None
4	Paint Booth	VOC's Particulates Isocyanates	Condition 1.1	2 layer corrugated paper filters
5	Flash-off	VOC's	None	No
6	Oven	VOC's Carbon dioxide Sulphur dioxide Nitrogen oxides	Condition 1.1	No

themselves and any discountable solvents (i.e. those sent for recycling or re-use). This inventory shall be submitted to the local authority at least once every 12 months (within 8 weeks of the period to which it relates) and shall include a determination of the total organic solvent usage for that period. Where appropriate the inventory shall include a determination of the solvent content of ready to use mixed on-site coatings and how this determination has been calculated.

2.6 Continuous monitoring shall take place to demonstrate compliance with clause 1.3

3.0 OPERATIONAL CONTROLS

3.1 The storage and mixing of coatings and other materials containing organic solvents shall only take place in the area marked on plan PPC/035/C.

3.2 The cleaning of components prior to coating shall only take place within the cleaning booth marked on plan PPC/035/C. Cleaning solvents shall be kept in enclosed containers when not in active use. Wiping clothes shall be impregnated with solvents in a controlled manner using dispensers. Used wiping clothes shall be stored in enclosed containers until disposal from site.

3.3 The application of coatings shall only take place in the paint booth marked on plan PPC/035/C and shall be via the use of high-volume-low-pressure spray guns.

3.4 Spray gun cleaning shall only take place in a specifically designed enclosed gun washing machine. The spray out of guns following cleaning shall only take place in this machine or within the spray booth where dirty solvents shall be sprayed and collected into a separate receptacle for subsequent disposal.

3.5 The dry filters fitted to the paint booth marked on plan PPC/035/C shall be replaced as necessary. Records of filter replacements shall be kept to demonstrate compliance with this requirement.

3.6 A spare set of unused dry filters for the paint booth shall be kept available on site at all times. Spent filters shall be stored in sealed bags or enclosed containers whilst awaiting disposal.

3.7 The oven drying of components shall only take place in the oven marked on plan PPC/035/C.

4.0 STACKS, DUCTS AND PROCESS VENTS

4.1 The stack serving the cleaning booth marked on plan numbered PPC/035/C shall be a minimum height of 3m above roof apex level and shall have a minimum efflux velocity of 6m/s.

4.2 Emissions from the paint booth marked on plan numbered PPC/035/C shall only be discharged via the dry filtration system and the stack serving this booth shall be a minimum height of 3m above roof apex level and shall have a minimum efflux velocity of 15m/s.

4.3 The stack serving the drying oven marked on plan numbered PPC/035/C shall be a minimum height of 3m above roof apex level and shall have a minimum efflux velocity of 10.5m/s.

4.4 No stack shall be fitted with a cap, cowl or similar restrictive device except with the prior approval of the local authority.

5.0 GENERAL OPERATIONS

5.1 The operator shall undertake regular cleaning and preventative maintenance including inspection and repair/replacement on all plant and equipment concerned with the emission, capture, transport and control of emissions to atmosphere. Where necessary manufacturers guidelines shall be used to determine the regularity of maintenance. Records of preventative maintenance including inspections and any works undertaken shall be kept on site and made available to the local authority inspector on request.

5.2 Spares and consumables for plant and equipment used in the installation in particular that subject to continual use or wear shall be held on site or shall be available at short notice. Such plant or equipment shall not be used unless that plant or equipment is capable of working in accordance with the conditions of this permit.

5.3 Staff at all levels shall receive the necessary training and instruction in their duties relating to control of the activities and emissions to air. Records shall be kept which details all relevant training provided to staff, and these records shall be kept for a minimum of 2 years.

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

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

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

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

6.0 Air Quality

6.1 The operator shall prepare a list of all emission points and related emissions to atmosphere based on table 1 above. The operator shall provide details (where known) of the emissions of those pollutants to atmosphere as a result of any sampling that may be carried out. Where sampling is not carried out the operator shall prepare an estimate of the emissions to atmosphere using known information such as duct sizes,

DOCUMENT B

CONDITIONS

All conditions shall have immediate effect unless stated otherwise.

1.0 EMISSION LIMITS AND CONTROLS

1.1 The following concentrations of emissions to atmosphere shall not be exceeded except in accordance with clauses 13 and 14 of the Secretary of State's Guidance Note PG6/23(97) – the coating of metal and plastic.

(a) total particulate matter from the stacks serving the paint booth marked on plan PPC/035/C 50mg/m3

(b) isocyanates (expressed as total carbon excluding particulate matter) from the stacks serving the paint booth and the drying oven booth marked on plan PPC/035/C 0.1mg/m3

(c) volatile organic compounds(expressed as total carbon excluding particulate matter) from the stacks serving the paint booth and drying oven booth marked on plan PPC/035/C 50 mg/m3

1.2 The introduction of dilution air to achieve the emission concentration limits is not permitted.

1.3 The airflow within the cleaning booth and paint booth marked on plan PPC/035/C shall be maintained under negative pressure to minimise fugitive emissions into the workshop at all times during the cleaning of components or the application of coatings. In the event of pressure failure the extraction system and air supply to the spray guns shall automatically cease, and shall not be restarted until the cause of the fault has been identified and remedied.

1.4 The paint booth marked on plan PPC/035/C shall be fitted with 2 layer pleated paper dry filters that shall be in place at all times when the application of coatings is taking place.

2.0 MONITORING, SAMPLING AND MEASUREMENT OF EMISSIONS

2.1 The operator shall notify the regulator of the proposed commissioning date of the new paint line at least 14 days before this date.

2.2 Following commissioning of the paint line sampling to demonstrate compliance with the emission limits outlined in clause 1.1 shall take place within 8 weeks. Thereafter sampling shall take place every 12 months.

2.3 At least 14 days before the sampling required by clause 2.2 takes place the operator shall submit for approval a written sampling protocol to the local authority which details the sampling methods to be used and pollutants to be tested for. All sampling shall be carried out using the methods agreed

2.4 Results of sampling to demonstrate compliance with clause 1.1 shall be submitted to the local authority within 8 weeks of the sampling taking place.

2.5 A detailed record shall be kept of all organic solvents used in the process and include the use of cleaning solvent, diluent solvents, solvents within the coatings

efflux velocity of gases etc. Such information shall be submitted as and when requested by the regulator and kept up to date following any changes to the installation.

DOCUMENT C

RESIDUAL DUTY

In relation to any aspect of the process not regulated by conditions 1.1 to 6.0 inclusive, 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/035 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.

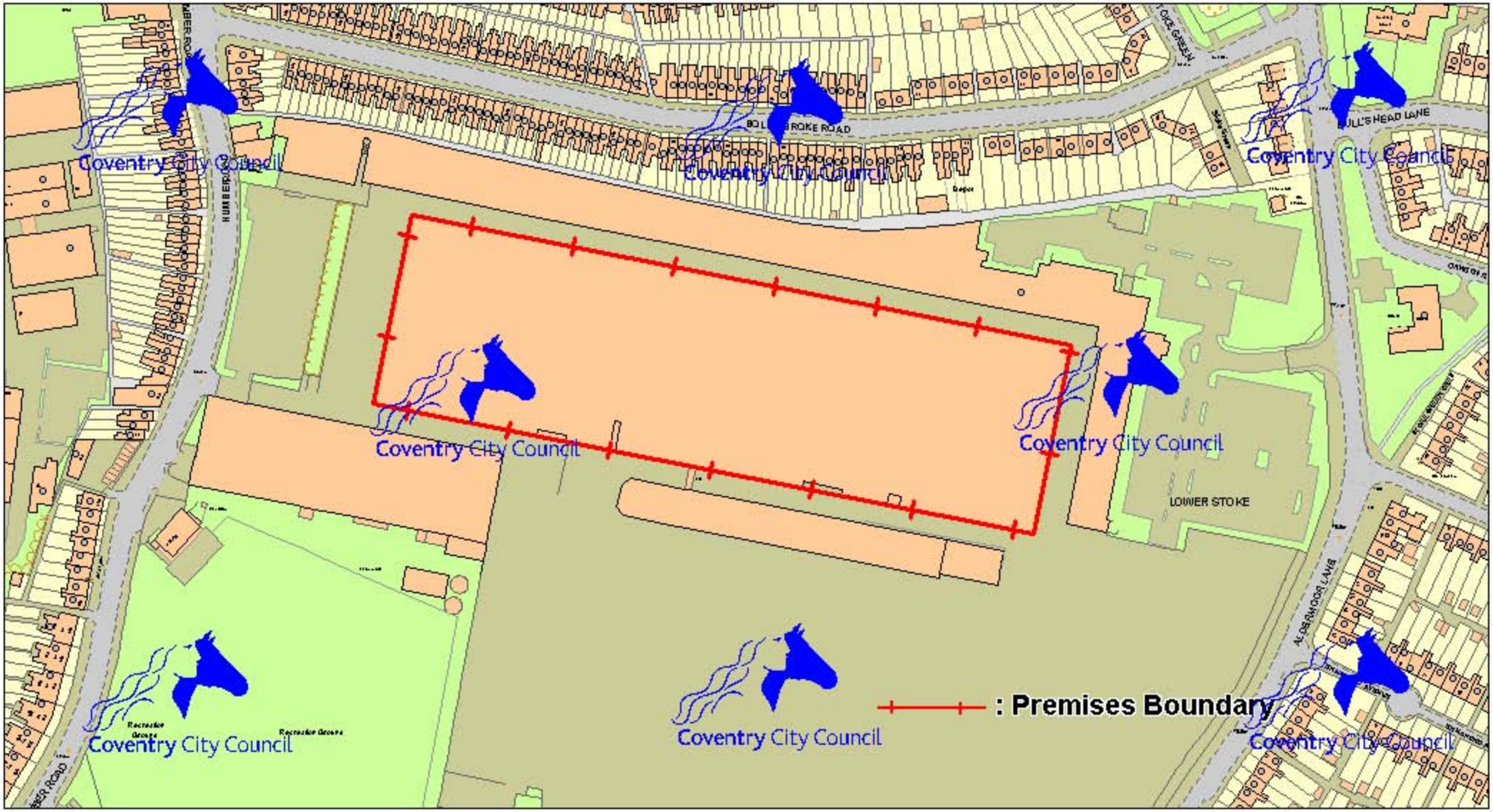
Protocols ensure that the sampling procedures are carried out correctly and that the results obtained accurately characterise the process.

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.

Plan PPC/035/A Premises Boundary of Faurecia Midlands Ltd.



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

Tel: 024 7683 1832
Fax: 024 7683 1840

035

ENVIRONMENTAL PROTECTION ACT 1990, PART 1
THE ENVIRONMENTAL PROTECTION (PRESCRIBED PROCESSES AND SUBSTANCES) REGULATIONS 1991 SI [ ]
THE ENVIRONMENTAL PROTECTION (APPLICATIONS, APPEALS AND REGISTERS) REGULATIONS 1991 SI [ ]

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

1. Either Name and address of applicant*

HILLS PRECISION COMPONENTS LTD.
PO BOX 200, HUMBER ROAD,
STOKE, COVENTRY
CV3 1LL

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

AS ABOVE

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

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

AS ABOVE
IN 'E' BLOCK

3. Address for correspondence if different from 1

AS ABOVE
C/O MR. D. DUCKETT.

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

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

- details of any proposed release of such a substance into the air and an assessment of the environmental consequences

- proposals for monitoring any release of such substances, the environmental consequences or any such release and the use of techniques for preventing (etc)?? releases

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

The applicant may also supply any other information he wishes the Local Authority to take into account in considering his application.

Fee enclosed (cheques to be made payable to

..... Council)

£ ..... To be forwarded at the end of August '92

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

.....J Duckett..... (Signature)

.....31:08:92..... (Date)

pol/kc25032ms

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

ENCLOSED

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

SEE PLAN

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

MAP OF PLANT.

(use continuation sheet if necessary)

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

- description of the prescribed process

ENVIRONMENTAL PROTECTION ACT 1990, PART 1
THE ENVIRONMENTAL PROTECTION (PRESCRIBED PROCESSES AND SUBSTANCES) REGULATIONS 1991 SI [ ]
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- description of the prescribed process

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

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

- details of any proposed release of such a substance into the air and an assessment of the environmental consequences

- proposals for monitoring any release of such substances, the environmental consequences or any such release and the use of techniques for preventing (etc)?? releases

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

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.....31.08.92..... (Date)

pol/kc25032ms

P.O. Box 200, Humber Road,
Stoke, Coventry CV3 1LU.

Tel: (0203) 635533
Telex: 31686
Fax: (0203) 535075

ADHESIVE SPRAY BOOTH AND DRYING TUNNEL

Process

Application of adhesive to plastics automobile parts using a 2 pack adhesive system.

Prescribed substances

Volatile organic compounds
Isocyanate (bonded)
Paint solids

Techniques to prevent releases

Glass fibre filters 10 micron.

Release of substances

Volatile organic compounds - less than 50 mg/m^3
Isocyanate - less than 0.1 mg/m^3
Particulate matter - less than 50 mg/m^3

Until the plant is operational it will not be possible to give an accurate assessment of these values but we are confident they will not exceed the above. Environmental consequences are believed to be negligible.

Monitoring

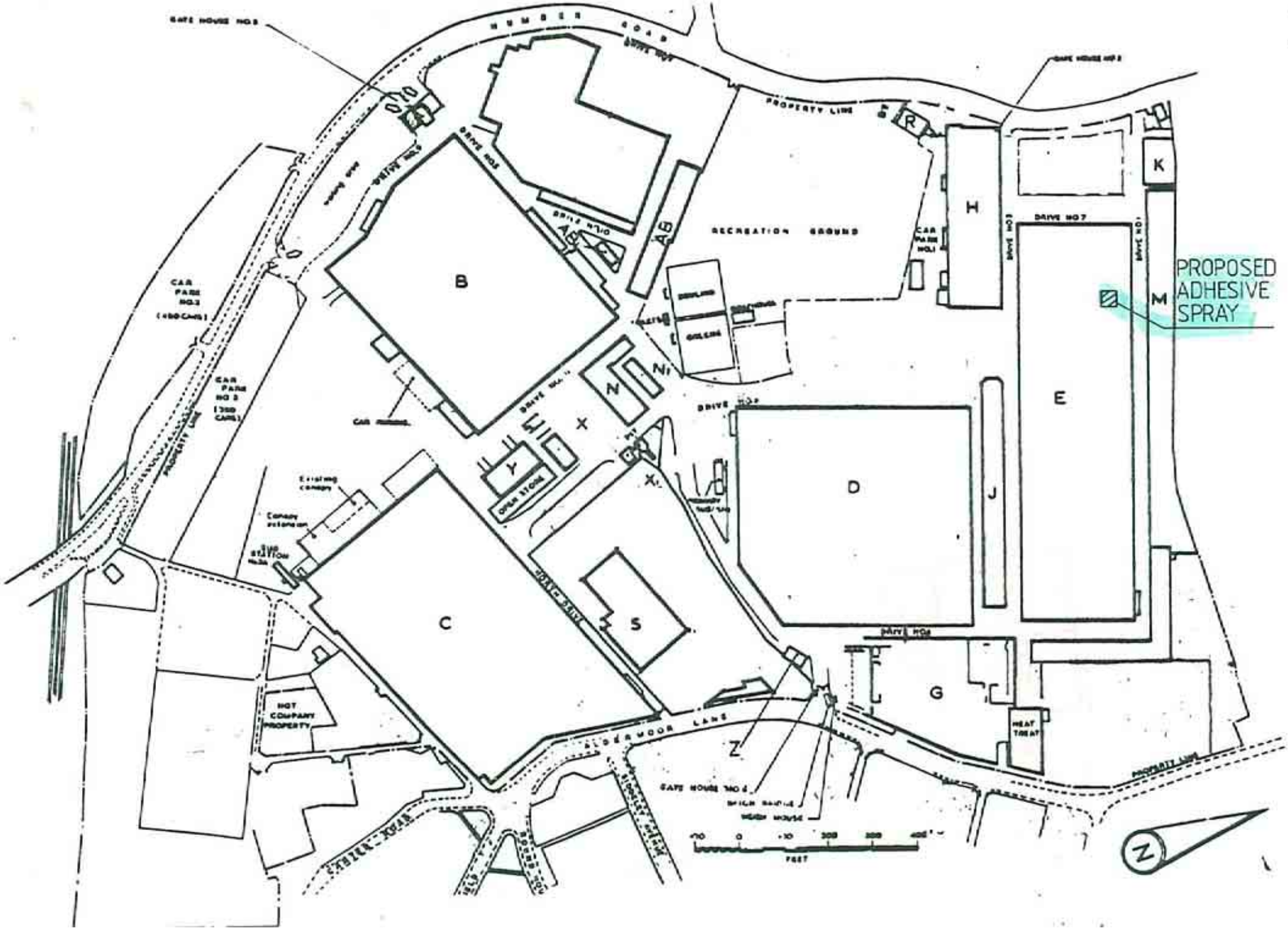
Provision has been made for sampling paints in the stack. The use of a contractor to carry out annual concentration tests is being investigated. Daily visual and olfactory monitoring will be carried out.

We are investigating the use of water based adhesives to replace the currently proposed system.

We consider that the means listed above will enable us to meet the objectives of section 7(2)(a) and that we can comply witht he condition implied by section 7(4) of the Environmental Protection Act 1990.

JMS/AF/29.07.92

Peugeot Talbot Stoke Plant



P.O. Box 200, Humber Road,
Stoke, Coventry CV3 1LU.

Tel: (0203) 635533
Telex: 31686
Fax: (0203) 535075

PAINT SPRAY BOOTH AND CURING OVEN

Process

Painting of plastics automobile parts using a 2 pack paint system.

Prescribed substances

Volatile organic compounds
Isocyanate (bonded)
Paint solids

Techniques to prevent releases

High efficiency water wash booth

Release of substances

Volatile organic compounds - less than 50 mg/m^3
Isocyanate - less than 0.1 mg/m^3
Particulate matter - less than 50 mg/m^3

Until the plant is operational it will not be possible to give an accurate assessment of these values but we are confident they will not exceed the above. Environmental consequences are believed to be negligible.

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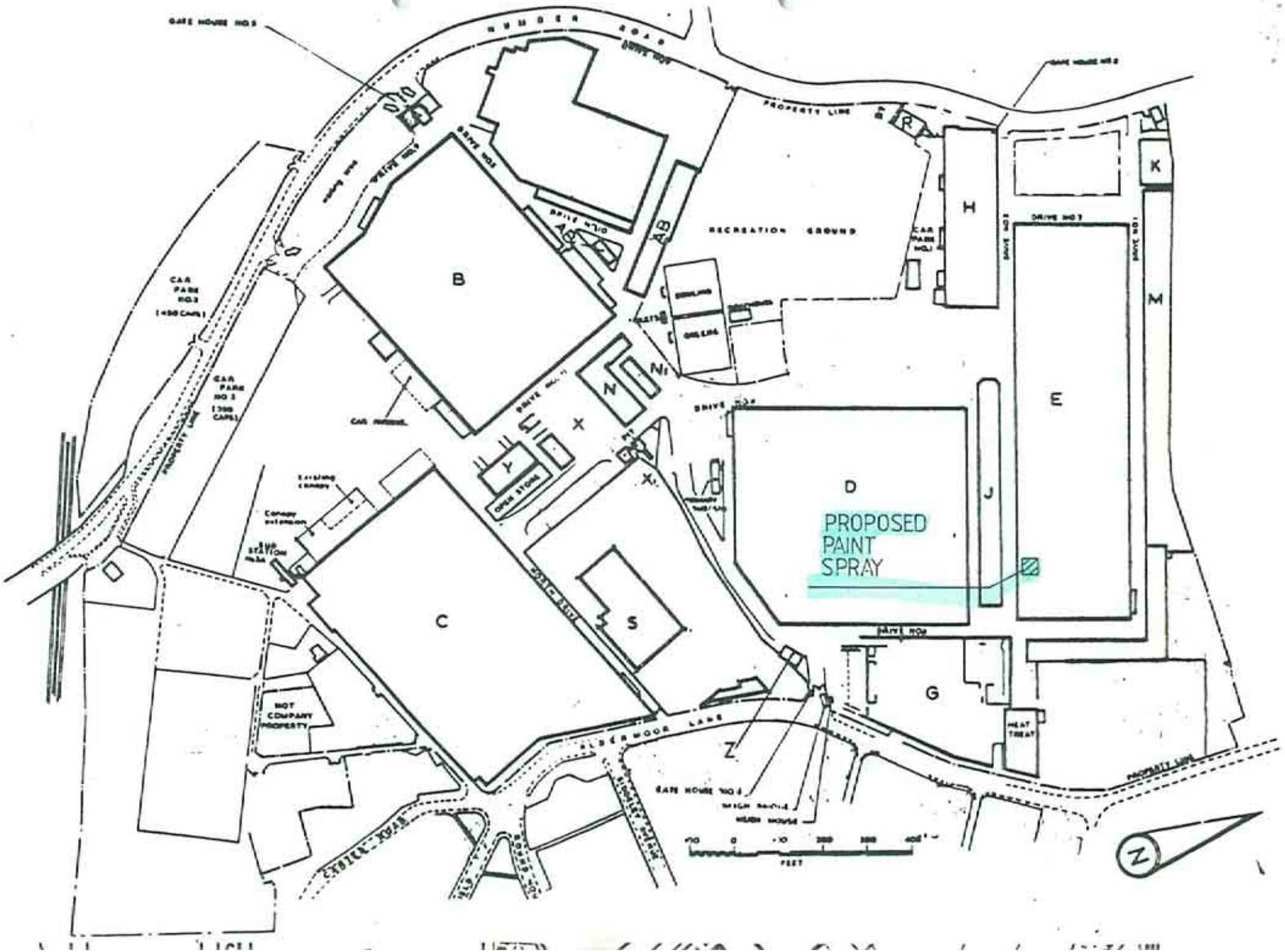
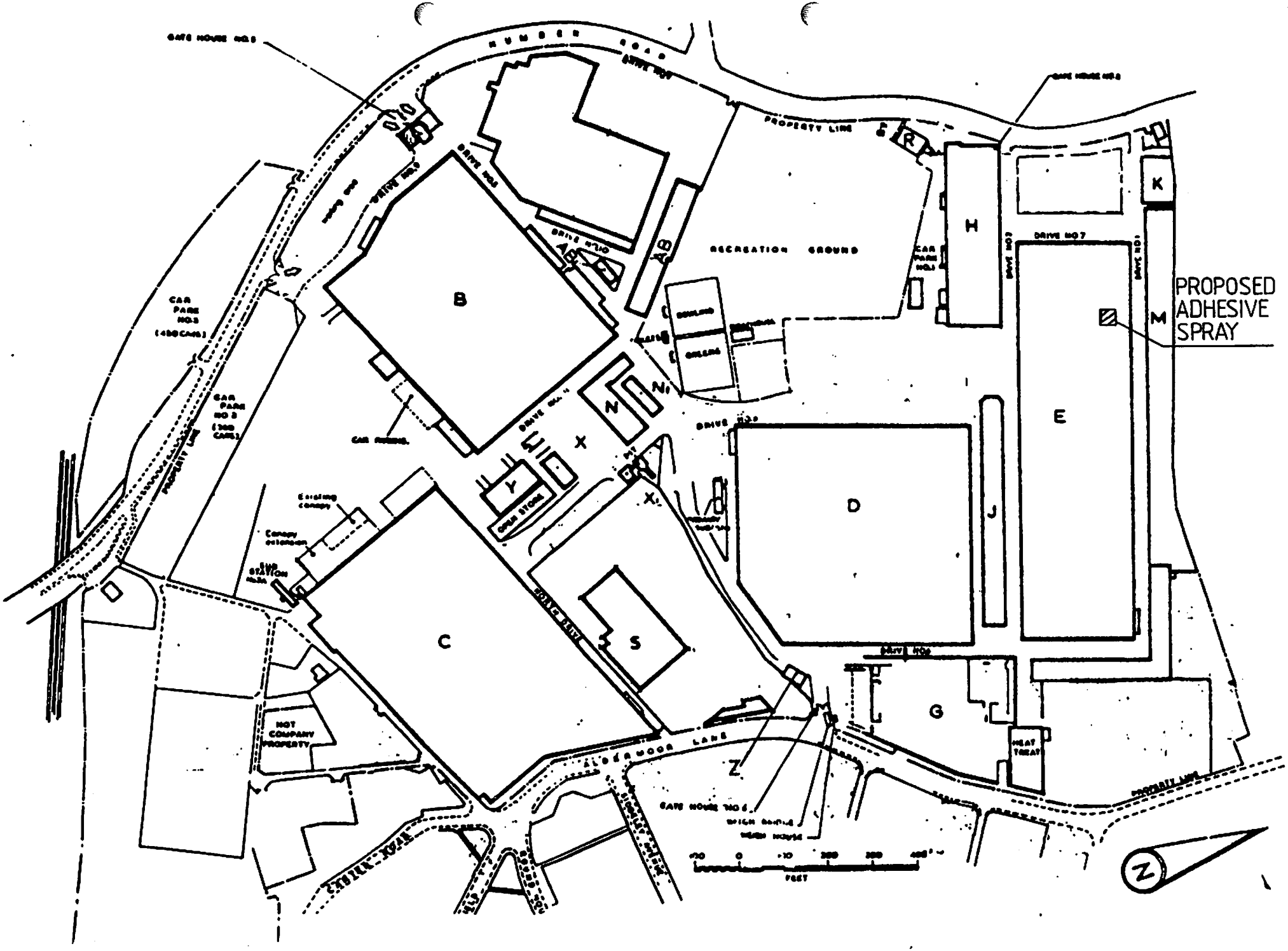
JMS/AF/29.07.92

Peugeot Talbot Stoke Plant



Peugeot Talbot Stoke Plant



P.O. Box 200, Humber Road,
Stoke, Coventry CV3 1LU.

Tel: (0203) 635533
Telex: 31686
Fax: (0203) 635075

Ref DD/HJC

7th September 1992

Mr D R Packard
Department of Environmental Services
Broadgate House,
Broadgate
COVENTRY
CV1 1NH

Dear Mr Packard

ENVIRONMENTAL PROTECTION ACT 1990
ADHESIVE COATING PROCESS

In answer to your letter dated 1st October 1992 I supply the following information :-

Re(I) The raw materials (solvents, paints and adhesives) will be received in sealed drums. They will be stored in the inflammable store (see plan). Only one day requirements will be kept in the booth in closed containers. They will be transported to the booths by forklift truck in a sealed containers.

Re(II) The operations are manual spraying although we may at a later date automate the adhesive spraying. The booths are special purpose. The adhesive booth is dry filter back and the paint booth is water back.

Re(III) The empty or part empty containers will be stored in a designated area and will be disposed of through our normal Poisonous Waste Contractor.

Yours Sincerely

D Duckett

ENVIRONMENTAL PROTECTION ACT 1990 - PART 1

NOTIFICATION OF APPLICATION UNDER SECTION 6

HILLS PRECISION COMPONENTS LTD.

has applied for authorisation from Coventry City Council to operate:-
an Adhesive coating process and spray painting process

at HILLS PRECISION COMPONENTS LTD
PO BOX 200, HUMBER ROAD, STOKE,
COVENTRY CV3 1LU

A copy of this application is available for public inspection, free of charge, during office hours at :-
Environmental Services Department
Broadgate House
Broadgate
COVENTRY
CV1 1NH

Written representatives about this application may be sent to the above address

within 28 days of 9th October 1992.

Area Director: P WARD

HSE
Health & Safety Executive

Engineering and Metal Goods (South) Group

Chief Environmental Health Officer
Coventry MBC
Environmental Services Department
Broadgate House
Broadgate
COVENTRY
CV1 1NH

Our Ref: WM07/EIM/SW

15 JAN 93

JAN 20 1993

Dear Sirs

ENVIRONMENTAL PROTECTION ACT 1990 PART 1: AUTHORISATION FOR DI-ISOCYANATE PROCESS

Thank you for consulting the Health and Safety Executive about the above application for di-isocyanate process at PO Box 200, Humber Road, Stoke, Coventry CV3 1LU submitted by Hills Precision Components Ltd. Details of the application are noted for our records.

This process involves the use of, or may give rise to, substances likely to be subject to the Control of Substances Hazardous to Health Regulations 1988 (COSHH). Occupational exposure limits for a range of substances have been assigned under COSHH. Details of these standards are given in the current edition of Guidance Note EH40, published annually by HMSO.

I confirm that HSE is responsible for enforcing health and safety legislation at these premises. In our assessment of this application we have not identified significant elements of conflict or ambiguity with health and safety at work issues. However, if your consideration of the application suggests that these conflicts might develop then please let me know. I would be pleased to discuss these with you before you make a determination.

It is suggested that the following text may be a useful reminder to the applicant and could be included in any covering letter sent with the authorisation. "This authorisation is issued under Part 1 of the Environmental Protection Act 1990. The responsibilities you have under legislation for health, safety and welfare in the workplace remain in force".

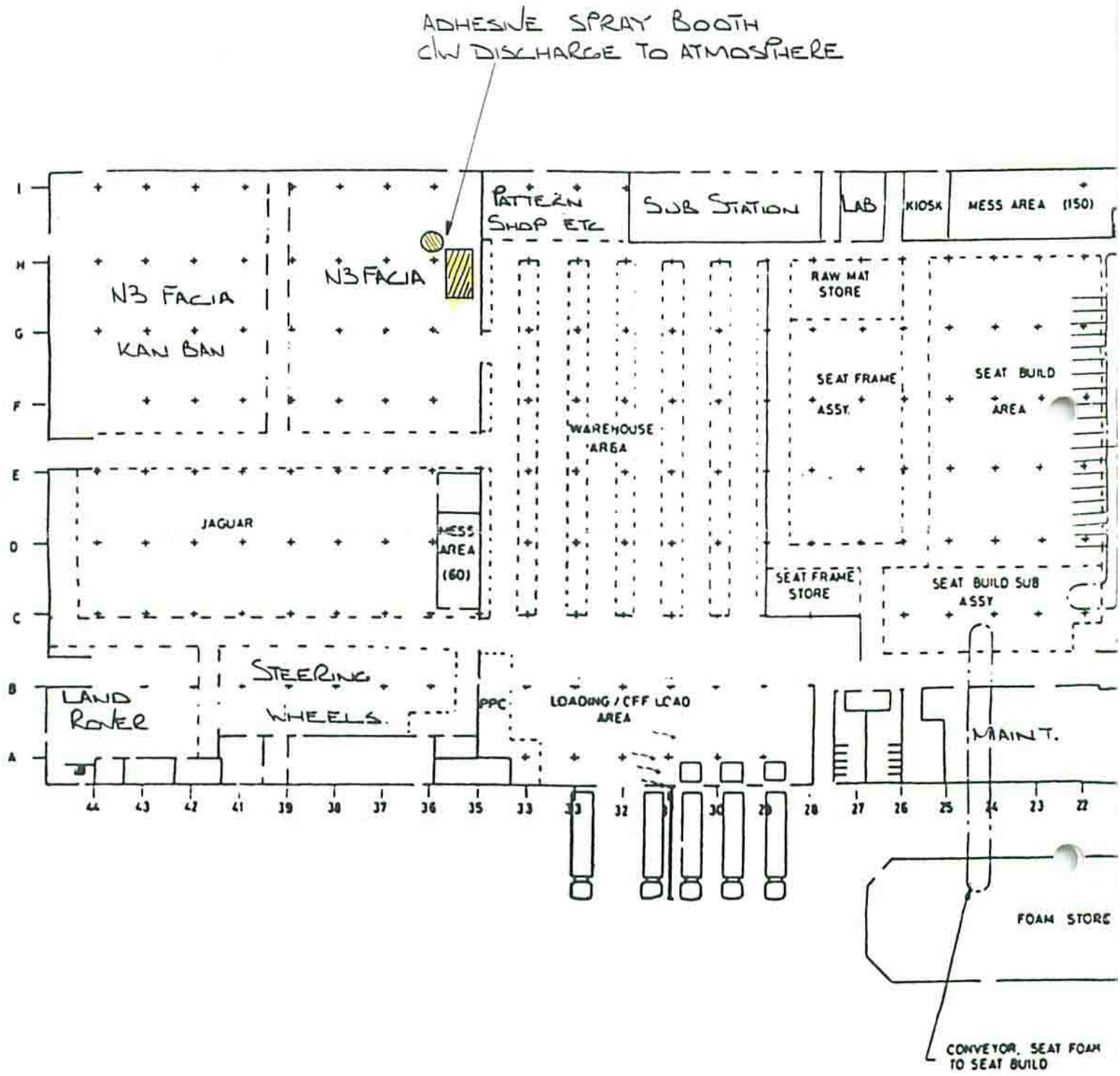
When the authorisation is issued I would be grateful if you would forward a copy to me for retention, so that it may be consulted at any future visit to the premises.

Yours faithfully

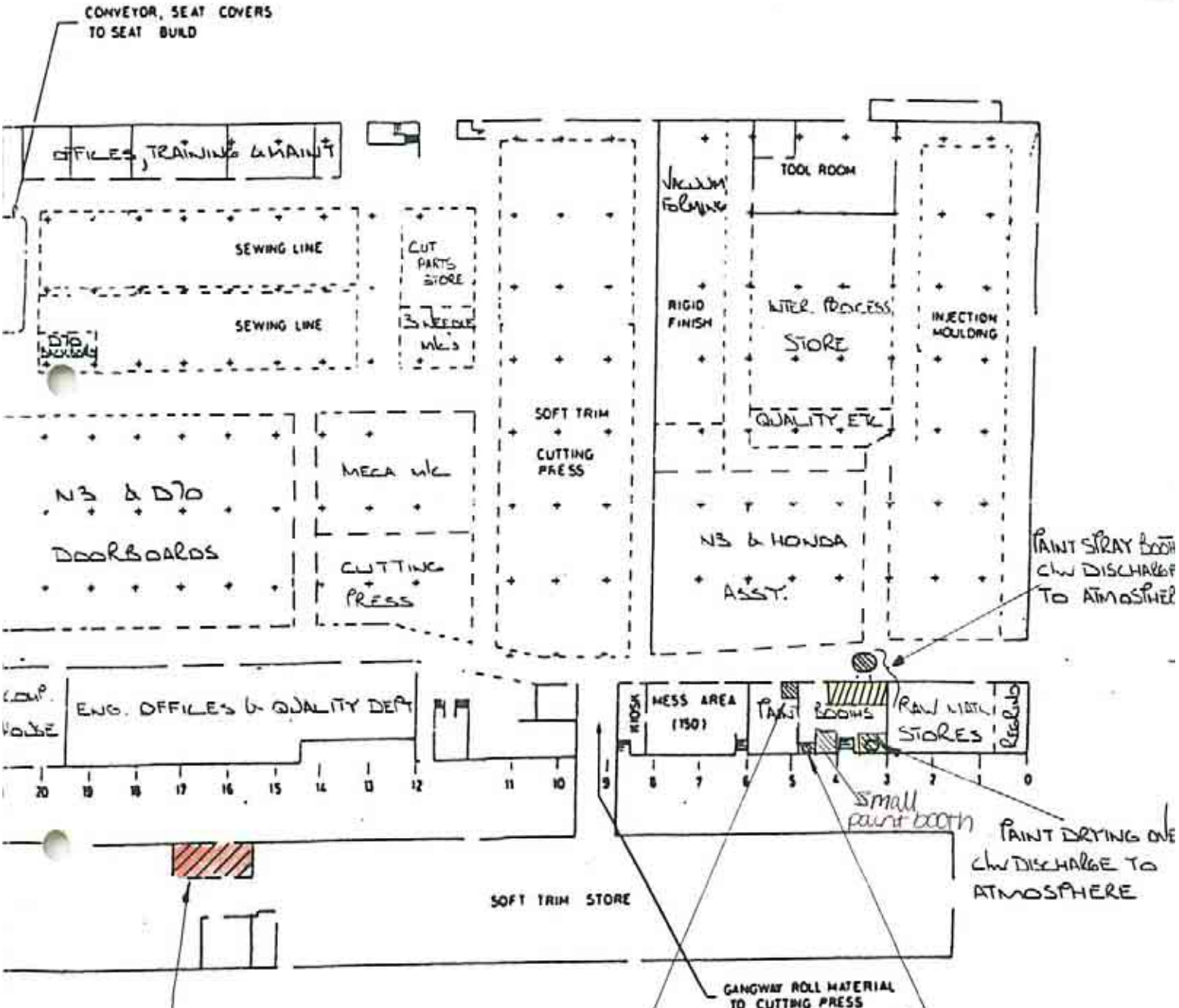
E Marshall

E I MARSHALL
HM Principal Inspector of Factories

McLaren Building, 2 Masshouse Circus, Queensway, Birmingham B4 7NP
Tel: 021-200 2299 Fax: 021-233 2176


ADHESIVE SPRAY BOOTH
C/W DISCHARGE TO ATMOSPHERE
PATTERN SHOP ETC
SUB STATION
LAB
KIOSK
MESS AREA (150)
N3 FACIA
N3 FACIA
KAN BAN
RAW MAT STORE
SEAT FRAME ASSY.
SEAT BUILD AREA
WAREHOUSE AREA
JAGUAR
MESS AREA (60)
SEAT FRAME STORE
SEAT BUILD SUB ASSY
STEERING WHEELS.
LAND ROVER
PPC
LOADING / OFF LOAD AREA
MAINT.
FOAM STORE
CONVEYOR. SEAT FOAM TO SEAT BUILD

BILL OF MATERIAL



	CHANGE RECORD DESCRIPTION		

HILLS PRECISION

FACILITIES ENGINEERING
MANUFACTURING ENGINEERING

1st/3rd ANGLE PROJECTION

DRAWN P HARRIS
DATE 27/7/89

TITLE
GENERAL BLOCK LAYOUT
STOKE PLANT

P.O. Box 200. Humber Road.
Stoke. Coventry CV3 1LU.

Tel: (0203) 635533
Telex: 31686
Fax: (0203) 535075

ADHESIVE SPRAY BOOTH AND DRYING TUNNEL

Process

Application of adhesive to plastics automobile parts using a 2 pack adhesive system.

Prescribed substances

Volatile organic compounds
Isocyanate (bonded)
Paint solids

Techniques to prevent releases

Glass fibre filters 10 micron.

Release of substances

Volatile organic compounds - less than 50 mg/m^3
Isocyanate - less than 0.1 mg/m^3
Particulate matter - less than 50 mg/m^3

Until the plant is operational it will not be possible to give an accurate assessment of these values but we are confident they will not exceed the above. Environmental consequences are believed to be negligible.

Monitoring

Provision has been made for sampling paints in the stack. The use of a contractor to carry out annual concentration tests is being investigated. Daily visual and olfactory monitoring will be carried out.

We are investigating the use of water based adhesives to replace the currently proposed system.

We consider that the means listed above will enable us to meet the objectives of section 7(2)(a) and that we can comply witht he condition implied by section 7(4) of the Environmental Protection Act 1990.

JMS/AF/29.07.92

P.O. Box 200, Humber Road.
Stoke, Coventry CV3 1LU.

Tel: (0203) 635533
Telex: 31686
Fax: (0203) 535075

PAINT SPRAY BOOTH AND CURING OVEN

Process

Painting of plastics automobile parts using a 2 pack paint system.

Prescribed substances

Volatile organic compounds
Isocyanate (bonded)
Paint solids

Techniques to prevent releases

High efficiency water wash booth

Release of substances

Volatile organic compounds - less than 50 mg/m^3
Isocyanate - less than 0.1 mg/m^3
Particulate matter - less than 50 mg/m^3

Until the plant is operational it will not be possible to give an accurate assessment of these values but we are confident they will not exceed the above. Environmental consequences are believed to be negligible.

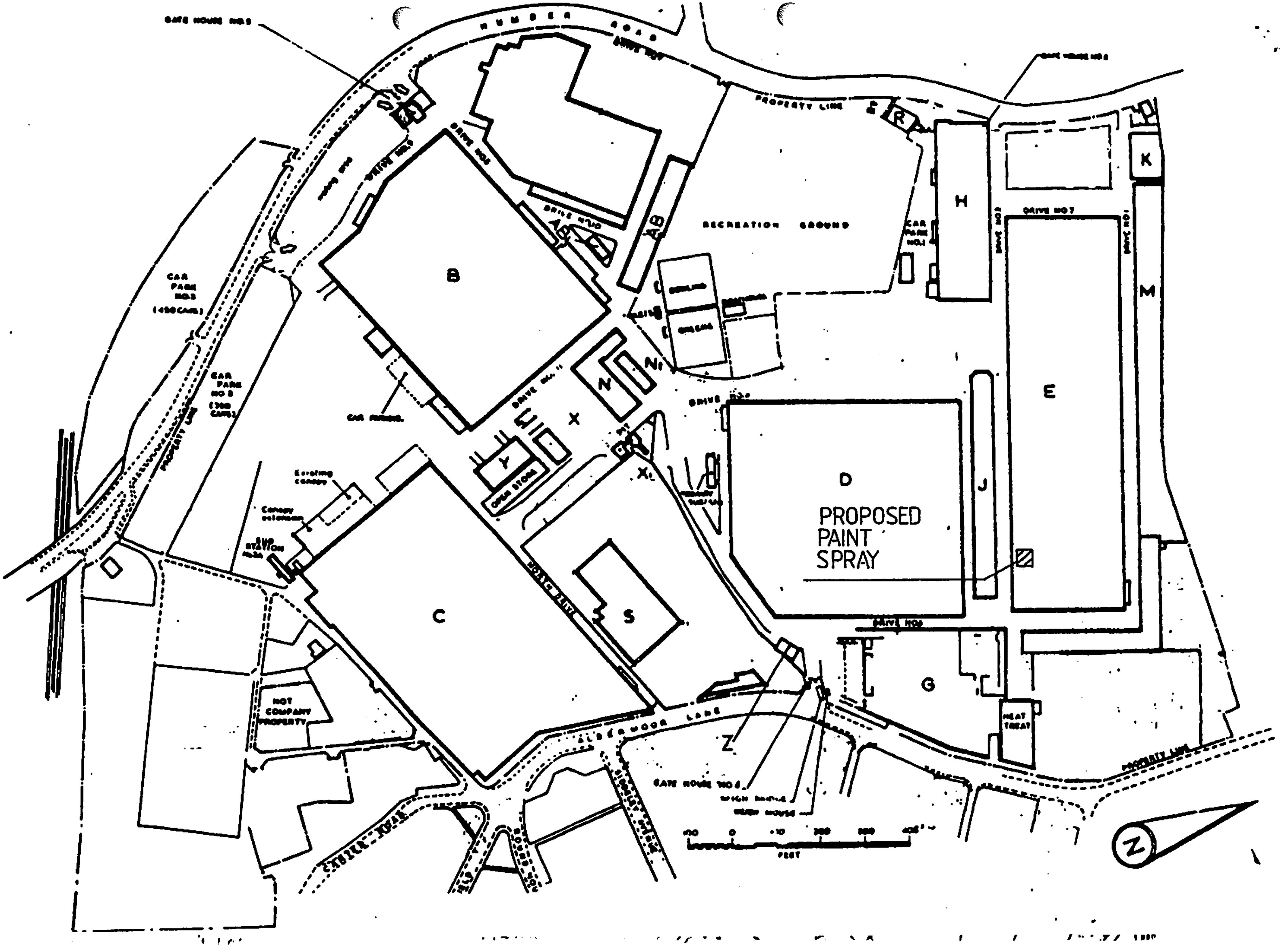
Monitoring

Provision has been made for sampling paints in the stacks The use of a contractor to carry out annual concentration tests is being investigated. Daily visual and olfactory monitoring will be carried out.

We are investigating the use of water based paints to replace the currently proposed system.

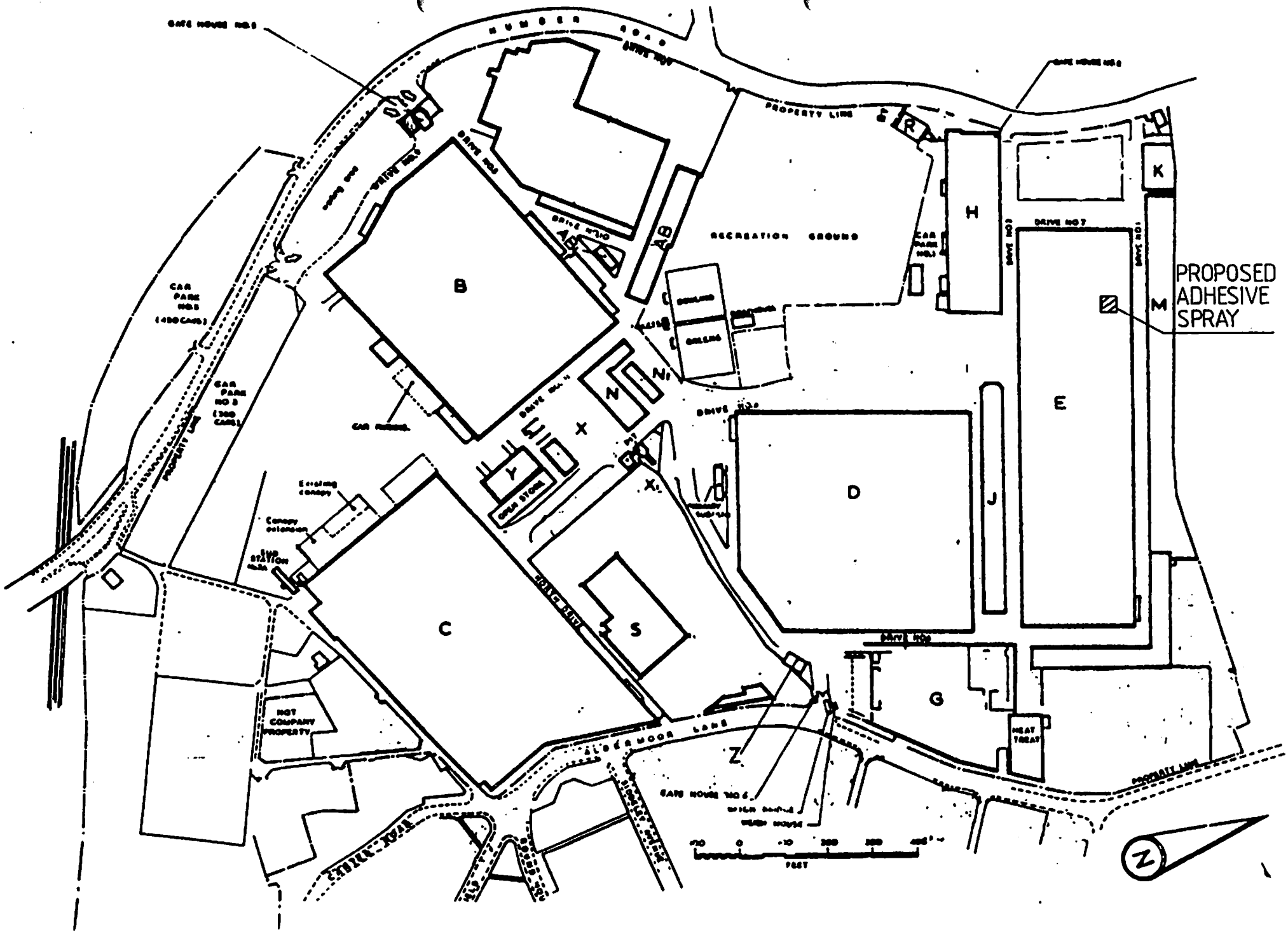
We consider that the means listed above will enable us to meet the objectives of section 7(2)(a) and that we can comply witht he condition implied by section 7(4) of the Environmental Protection Act 1990.

JMS/AF/29.07.92



HUMBER ROAD
GATE HOUSE NO.5
GATE HOUSE NO.1
CAR PARK NO.5
CAR PARK NO.3
CAR PARK NO.1
PROPERTY LINE
RECREATION GROUND
B
C
D
PROPOSED
PAINT
SPRAY
E
G
H
J
K
M
N
S
X
Y
Z
AB
R
OPEN STORE
HEAT TREAT
NOT COMPANY PROPERTY
ALDERMOOR LANE
GATE HOUSE NO.4
DRIVE NO.7
DRIVE NO.2
DRIVE NO.1
DRIVE NO.10
DRIVE NO.11
FEET

Peugeot Talbot Stoke Plant



read with VN dated 19th December 2002

Coventry City Council

THE ENVIRONMENTAL PROTECTION ACT 1990

The Environmental Protection (Prescribed Processes and Substances) Regulations 1991, SI 472.

The Environmental Protection (Application, Appeals and Registers) Regulations 1991, SI 507.

Authorisation No: 035
Application Received: 2nd September 1993

Notice is hereby given that under the Environmental Protection Act 1990 Coventry City Council (hereafter called the Authority) gives authorisation to:

Faurecia Midlands Limited
P O Box 200
Humber Road, Stoke
Coventry CV3 1LU

Register in England No: 2145693

For the spray painting of plastic components at:

Faurecia Midlands Limited
P O Box 200
Humber Road, Stoke
Coventry CV3 1LU

Subject to the conditions specified on the attached pages, Nos 1 to 4, and within the process boundary as indicated on Plan No. 1.

Signed ..... Dated ..... day of 2001
City Environment Officer

1. DESCRIPTION OF PROCESS

1.1 This authorisation is for the application of paint to plastic automobile components, as described in the Environmental Protection (Prescribed Processes and Substances) Regulations 1991, SI472, Section 6.5 Part B Paragraph (a), within the boundary outlined in red on the attached Plan numbered 1 and specifically relates to the processes outlined below.

1.2 The storage of paints within the flammable material stores as marked on Plan numbered 1.

1.3 The mixing of paint in the paint mixing booth marked on Plan numbered 1.

1.4 Deleted.

1.5 The application of two pack paint using high volume low pressure guns in the large paint spray booth and small paint spray booth as marked on Plan number 1, utilising high efficiency water wash filter.

1.6 The drying of paint in the paint drying oven as marked on Plan numbered 1.

2. EMISSION LIMITS AND CONTROLS

2.1 There shall be no offensive odour outside of the process boundary as perceived by the Local Authority Inspector

2.1.1 Deleted.

2.1.2 Deleted.

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

2.2.1 Deleted.

2.2.2 The following concentrations of emission to atmosphere from the large and small paint spray booth shall not be exceeded except in accordance with clauses 13 and 14 of secretary of state's Guidance Note PG 6/23(97) – coating of metal and plastic

a.) Total particulate matter 50 mg/m^3
b.) Iscocyanates (expressed as total NCO group excluding particulate matter) 0.1 mg/m^3
c.) Volatile organic compounds (expressed as total carbon excluding particulate matter) 150 mg/m^3

2.3 Coatings used shall not contain di-acetone alcohol.

2.4 The small and large spray booths shall be cleaned every 7 days to include:

(a) the draining of the water tanks prior to cleaning
(b) screens, plates, troughs, gulleys and legs
(c) the removal of debris from the access tunnel sidewalls for the large booth
(d) ball valves and tanks
(e) water curtains
(f) the final rinse of the tanks, booths and associated pipework with an antibacterial agent in accordance with the manufacturer instructions
(g) the refilling of the tanks with clean towns water

Any deviation from this procedure shall only take place with prior written approval from the Local Authority. Records of cleaning undertaken shall be kept in accordance with clause 3.7.

3. MONITORING SAMPLING AND MEASUREMENT OF EMISSIONS

3.1 The level of water in the header tank for the large and small paint spray booths shall be visually checked on a daily basis.

3.1.1 The pH of the water in the header tank for the large and small paint spray booths shall be automatically measured and recorded every 180 minutes.

3.2 The water in the header tank for the large and small paint spray booths shall be tested for total bacterial count at least once per day.

3.3 The results of monitoring and testing to comply with clauses 3.1, 3.1.1 and 3.2 shall be recorded in a log book and shall include the date and time the monitoring and testing was undertaken, and the name of the person who carried out these duties. The log book shall be retained on site for a minimum of 2 years.

3.4 Any adverse results from the monitoring required by clause 3.1, 3.1.1 and 3.2 shall be investigated immediately and the appropriate remedial action taken. If necessary spraying operations shall cease until the fault has been identified and remedied. Details of any faults noted and remedial action taken shall be recorded in the log book, outlined in clause 3.3.

3.4.1 Deleted.

3.4.2 The local authority shall be notified at least 14 days in advance of any monitoring to demonstrate compliance with clause 3.4.4. This notification shall include the proposed date and time of monitoring, the pollutants to be tested for and methods to be used

3.4.3 Deleted.

3.4.4 Monitoring to demonstrate compliance with clause 2.2.2 shall take place at least once every 12 months. The results of monitoring shall be forwarded to the Local Authority within 8 weeks of the monitoring taking place

3.4.5 Deleted

3.4.6 Deleted

3.5 A detailed record shall be kept of all organic solvents used in the prescribed processes. This shall include the use of cleaning solvent, diluent solvent and solvents contained within the coatings used. This inventory shall be forwarded to the local Authority on the form prescribed by this Authority at least once every twelve months and shall include a determination for the total organic solvent usage for that period.

3.6 Records shall be kept in the log book referred to in clause 3.3 of any chemical additives made to the water in the header tank for the large and small paint spray booth and shall include the name and purpose of the additive, the date and time the addition was made to the tank and the quantities involved.

3.7 Records shall be kept in the logbook referred to in clause 3.3 of the cleaning undertaken on the large and small paint spray booths including the header tank and shall include a description of the cleaning undertaken, the date cleaning took place, any chemicals used, and the name of the person who undertook such duties.

4. MATERIALS HANDLING

4.1 Solvents and paints shall be stored within the Flammable Stores as shown on Plan number 1, except for one day's supply at each of the spray booths.

4.2 The cleaning of spray guns and other equipment shall only be carried out in the spray booths whilst the booth fans are in operation and filters are in place.

4.3 The mixing of paint shall only be carried out in the area marked paint mixing area as shown on the Plan numbered 1.

4.4 Spray gun testing, following cleaning shall only be carried out in the spray booths. This shall only be undertaken while the spray booths are in proper working order.

4.5 All full, partially full and nominally empty containers which hold or have held materials which contain organic solvents must be stored in sealed containers.

4.6 All dirty solvents and other liquid wastes which contain volatile organic compounds shall be dispatched for recycling to an authorised person. Copies of receipts for dispatched materials shall be retained for four years (immediately).

5. CHIMNEYS, VENTS AND PROCESS EXHAUSTS

5.1 Deleted.

5.2 Emissions from the large and small paint spray booth shall be discharged through a high efficiency water wash filter and through the stack marked F2 and F2a on the attached Plan numbered 1. The height of the final discharge point shall be 3m above roof ridge. The efflux velocity at the final discharge point shall not be less than 15m/sec

5.3 Emissions from the paint drying oven shall discharged to atmosphere through the stack marked F3 on the attached Plan numbered 1. The height of the final discharge point shall be 3m above roof ridge (immediately).

5.4 Emissions from the paint mixing booth shall discharged to atmosphere through the stack marked F4 on the attached Plan.

6. GENERAL OPERATIONS

6.1 Any mechanical malfunction or spillage of material shall be attended to and remedied as soon as possible. Any incident likely to give rise to adverse atmospheric emissions shall be noted in detail in the process log book as described in 3.3.

6.2 Any incidents likely to give rise to emissions which may have an impact on the local community shall be reported immediately to this Authority.

6.3 A copy of this authorisation shall be displayed so it can be conveniently read by persons having duties which are or maybe affected by this authorisation.

6.4 The operator shall supply, to this Authority, on demand and without charge, a copy of all or part of the monitoring records kept in accordance with this authorisation.

7. UPGRADING OF THE PROCESS

7.1 Deleted.

NEW PAINT FACILITY

1. DESCRIPTION OF PROCESS

1.1 This authorisation is for the coating of automotive components as described in the Environmental Protection (Prescribed Processes and Substances) Regulations 1991 SI147, section 6.5 part B paragraph (a) within the boundary outlined in red on the attached plan 3 and specifically relates to the processes outlined below.

1.2 The storage and preparation of paints within the area marked on plan 4.

1.3 The solvent cleaning of components prior to coating using wiping clothes and dispensers in the cleaning booth marked on plan 4.

1.4 The flaming of components using flaming booths to aid the required paint adhesion.

1.5 The coating of components using high volume low pressure guns in the paint booth marked on plan 4.

1.6 The oven drying of components in the oven marked on plan 4.

1.7 No changes shall be made to the above description without the prior written approval of this local authority.

2. EMISSION LIMITS AND CONTROLS

2.1 The following concentrations of emissions to atmosphere shall not be exceeded except in accordance with clauses 13 and 14 of the Secretary of State's Guidance Note PG6/23(97) – the coating of metal and plastic.

a) total particulate matter from the stacks serving the paint booth 50mg/m3

b) isocyanates from the stacks serving the paint booth and the drying oven (expressed as total carbon excluding particulate matter) 0.1 mg/m3

c) volatile organic compounds from the stacks serving the paint booth and drying oven (expressed as total carbon excluding particulate matter) 50 mg/m3

2.2 The introduction of dilution air to achieve the emission concentration limits is not permitted.

2.3 The airflow within the cleaning booth and paint booth marked on plan 4 shall be maintained under negative pressure to minimise fugitive emissions into the workshop at all times during the cleaning of components or the application of coatings. In the event of pressure failure the extraction system and air supply to the spray guns shall automatically cease, and shall not be restarted until the cause of the fault has been identified and remedied.

2.4 The paint booth marked on plan 4 shall be fitted with 2 layer pleated paper dry filters that shall be in place at all times when the application of coatings is taking place.

3. MONITORING SAMPLING AND MEASUREMENT OF EMISSIONS

3.1 The operator shall notify the local authority of the proposed commissioning date of the new paint line at least 14 days before this date.

3.2 Following commissioning of the paint line sampling to demonstrate compliance with the emission limits outlined in clause 2.1 shall take place within 8 weeks. Thereafter sampling shall take place every 12 months.

3.2 At least 7 days before the sampling required by clause 3.2 takes place the operator shall notify the local authority of the provisional date of sampling and the methods to be used.

3.4 Results of sampling to demonstrate compliance with clause 2.1 shall be submitted to the local authority within 8 weeks of the sampling taking place.

3.5 A detailed record shall be kept of all organic solvents used in the process and include the use of cleaning solvent, diluent solvents, solvents within the coatings themselves and any discountable solvents (i.e. those sent for recycling or re-use). This inventory shall be submitted to the local authority at least once every 12 months (within 8 weeks of the period to which it relates) and shall include a determination of the total organic solvent usage for that period where appropriate the inventory shall include a determination of the solvent content of ready to use mixed on site coatings and how *this* determination has been calculated.

3.6 Continuous monitoring shall take place to demonstrate compliance with clause 2.3

4. MATERIALS HANDLING

4.1 The storage and mixing of coatings and other materials containing organic solvents shall only take place in the area marked on plan 4.

4.2 The cleaning of components prior to coating shall only take place within the cleaning booth marked on plan 4. Cleaning solvents shall be kept in enclosed containers when not in active use. Wiping clothes shall be impregnated with solvents in a controlled manner using dispensers. Used wiping clothes shall be stored in enclosed containers until disposal from site.

4.3 The application of coatings shall only take place in the paint booth marked on plan 4 and shall be via the use of high-volume-low-pressure spray guns.

4.4 Spray gun cleaning shall only take place in a specifically designed enclosed gun washing machine. The spray out of guns following cleaning shall only take place in this machine or within the spray booth where dirty solvents shall be sprayed and collected into a separate receptacle for subsequent disposal.

4.5 The dry filters fitted to the paint booth marked on plan 4 shall be replaced as necessary. Records of filter replacements shall be kept to demonstrate compliance with this requirement.

4.6 A spare set of unused dry filters for the paint booth shall be kept available on site at all times. Spent filters shall be stored in sealed bags or enclosed containers whilst awaiting disposal.

4.7 The oven drying of components shall only take place in the oven marked on plan 4.

5. CHIMNEYS VENTS AND PROCESS EXHAUSTS

5.1 The stack serving the cleaning booth marked on plan numbered 4 shall be a minimum height of 3m above roof apex level and shall have a minimum efflux velocity of 6m/s.

5.2 Emissions from the paint booth marked on plan numbered 4 shall only be discharged via the dry filtration system and the stack serving this booth shall be a minimum height of 3m above roof apex level and shall have a minimum efflux velocity of 15m/s.

5.3 The stack serving the drying oven marked on plan numbered 4 shall be a minimum height of 3m above roof apex level and shall have a minimum efflux velocity of 10.5m/s.

5.4 No stack shall be fitted with a cap, cowl or similar restrictive device except with the prior approval of the local authority.

6. GENERAL OPERATIONS

6.1 The operator shall undertake regular preventative maintenance including inspection and repair/replacement following the commissioning date of the new paint line for all plant deemed to be critical in minimising or controlling emissions to atmosphere. Where necessary manufacturers guidelines shall be used to determine the regularity of maintenance. Records of inspection and any remedial works undertaken shall be kept on site and made available to the local authority inspector on request.

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

6.2 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.

6.4 The operator shall supply on demand and without charge a copy of all or part of any of the records required to be kept by this authorisation.