

74



HOUSING AND ENVIRONMENTAL SERVICES DIRECTORATE  
Director Howard T. Farrand  
Providing Housing, Environmental and Client Agency Services  
Michael J. Green  
City Environment Officer  
Broadgate House  
Broadgate  
Coventry, CV1 1NH  
Telephone : 01203 85 1852/34  
Telecom Gold Mailbox : 76 : END042  
Fax : 01203 85 1831

Your reference :  
Our reference : EH/EP/GAP (em)  
Please ask for : G A Powell  
Direct Dialling No: 831857  
Date : 11th April 1996

**THE ENVIRONMENTAL PROTECTION ACT 1990**

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

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

**Authorisation No: 074  
Application Received: 15th June 1995**

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


**Frank Brookes (Coventry) Limited  
Unit 24  
Bilton Industrial Estate  
Humber Avenue  
COVENTRY  
CV3 1JL**

**Register in England No: 913919**

For the respraying of road vehicles as described on Page 2 at:

**Frank Brookes (Coventry) Limited  
Unit 24 Bilton Industrial Estate  
Humber Avenue  
COVENTRY  
CV3 1JL**

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 11th day of April ..... 1996  
City Environment Officer

## **1. DESCRIPTION OF PROCESS**

- 1.1 This authorisation is for the respraying of motor vehicles, as described in the Environmental Protection (Prescribed Processes and Substances) Regulations 1991, SI472 (as amended), Section 6.5 Part B paragraph (b) within the process boundary outlined in red on the attached Plan numbered 1 and specifically relates to the processes outlined below.
- 1.2 The delivery and storage of paints, diluents and cleaning solvents in the paint mix room as shown in the Plan numbered 2.
- 1.3 The dry sanding of vehicles in the strip bay areas employing the use of D A sanding equipment and a mobile dust extraction system.
- 1.4 The mixing of paints on the ICI Auto colour mixing system using self sealing pouring facilities.
- 1.5 The spraying and low temperature bake curing of vehicles in 2 Dalby SSS spray booths/ovens run by Gas Fire boilers employing the use of HVLP guns and conventional Air spray guns.
- 1.6 The application of wax underseal and panel sealants by brush or injection methods.
- 1.7 Any change to the process described above must not take place without the prior consent from this Authority.

## **2. EMISSION LIMITS AND CONTROLS**

- 2.1 All emissions to air shall be free from offensive odour outside the process boundary, as perceived by the local Authority Inspector.
- 2.2 There shall be no visible emissions of particulate matter noticeable beyond the process boundary.

## **3. MONITORING SAMPLING AND MEASUREMENT OF EMISSIONS**

- 3.1 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 deposits beyond the process boundary at the position marked X on the plan numbered 1.
- 3.2 An olfactory assessment of emissions of volatile organic compounds shall be carried out at least once a day around the area immediately beyond the process boundary.
- 3.3 The results of monitoring to comply with 3.1 and 3.2. Shall be recorded in a log book. This shall include the date, time, wind strength and direction, the name of the observer and an assessment of the emissions. This log book shall be retained, on site, for a minimum of four years.

- 3.4 Any adverse results from the monitoring required in 3.1, and 3.2 shall be followed up immediately by the investigation of the cause of the emission and any corrective action taken, with this also being recorded in the log book in 3.3.
- 3.5 A detailed record shall be kept of all organic solvents used in the prescribed processes. This shall include cleaning solvent usage, diluent solvent usage and solvents contained within coatings used. This inventory shall be forwarded to the local Authority at least once every six months and shall include a determination for the total organic solvent usage for that period.

#### **4. MATERIALS HANDLING**

- 4.1 The cleaning of spray guns shall only be carried out in the fully enclosed semi-automatic gun cleaning system located in the paint mix room.
- 4.2 The mixing of paint shall only be carried out in the area marked paint mix room as shown on the Plan numbered 2.
- 4.3 Spray gun testing, following cleaning shall only be carried out in a separate chamber which must be provided with extraction or an integral part of the gun cleaning system.
- 4.4 Spraying shall only be carried out in the spray booths, which shall be in proper working order.
- 4.5 Dry sanding of vehicles using powered equipment shall only be carried out when the mobile dust extraction equipment is in operation.
- 4.6 All full, partially full and nominally empty containers which hold or have held materials which contain organic solvents must be stored together and the containers must be tightly lidded. All paint cans that are partially full and designed to do so must be stored on the ICI Autocolor mixing racks in the paint mix room.

#### **5. CHIMNEYS, VENTS AND PROCESS EXHAUSTS**

- 5.1 Emissions from the spraying or curing of coatings in the two Dolby SSS booths/ovens shall only be emitted to atmosphere via the Dry Filtration system.

#### **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 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 neighbouring residents 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 No later than six months from the date of this authorisation, a programme for upgrading the process shall be submitted to this Authority. The upgrading programme shall have regard to the Secretary of State's Guidance:

Respraying of Road Vehicles PG 6/34 (92) and amendments.

7.2 Any proposed methods for non-continuous emission sampling for the purposes of complying with the authorisation must be agreed in writing with this Authority.

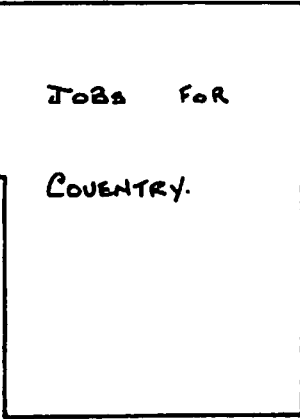
## **SUPPLEMENTARY NOTES**

### **THESE NOTES ARE NOT PART OF THE AUTHORISATION**

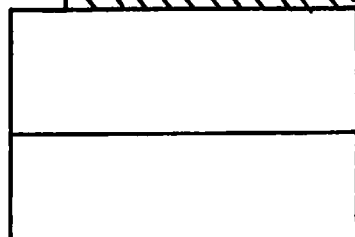
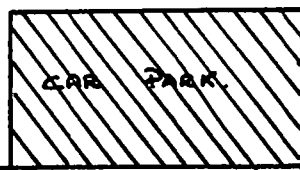
1. Your attention is drawn to your obligation under Section 7(2) of the Environmental Protection Act 1990 to ensure that the best available techniques, not entailing excessive cost (BATNEEC) for:
  - A) preventing the release of prescribed substances into the air or where that is not practicable by such means, for reducing the release into the air of such substances to the minimum and for rendering harmless any such substances that are so released
  - and
  - B) for rendering harmless any other substances which might cause harm if released into the air.
2. The authority for contact purposes should be taken to mean the head of the Environmental Protection Section, Tel 831832 during office hours, 832222 outside office hours.
3. You will note that condition 7.1 of the authorisation requires you to submit a schedule of works for approval by this Authority, within six months of the issue date. This schedule must describe the procedures and improvements that you intend to implement in order to meet the requirements of the relevant guidance note referenced within the authorisation. From observations and inspections of the process I would recommend that the following topics are specifically included.
  - a) The results of non-continuous emission sampling of emissions from the Dalby booths to indicate what improvements (if any) are required to ensure compliance with the emission limits stated in the Process Guidance Note.
  - b) The proposed frequency of further non-continuous emission sampling, taking into account the results of the initial monitoring exercise.
  - c) The adoption of HVLP or other spraying techniques to ensure a transfer efficiency of > 65%.
  - d) The fitting of positive pressure alarms to warn of an over pressure situation occurring in the Dalby booths.
  - e) The increase in height of the final discharge points from the Dalby booths according to the requirements of the Process Guidance Note. This should include a calculation of the proposed ground level pollutant concentration around the prescribed process.
  - f) An initial indication of the intended options for emissions of volatile organic compounds to be pursued according to Clause of the Process Guidance Note.



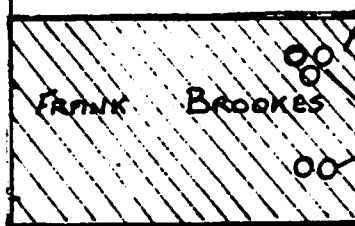
HUMBER AVENUE



ESTATE ROAD

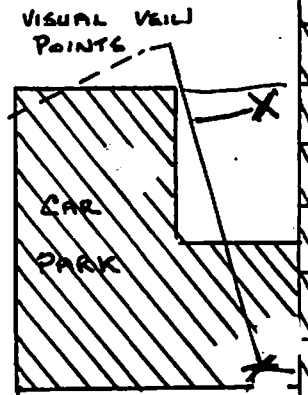
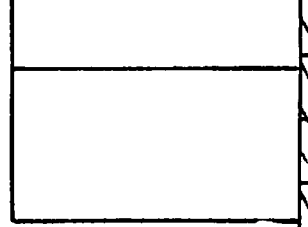
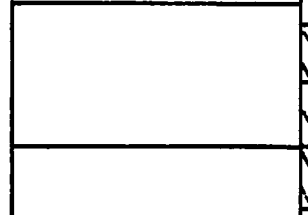
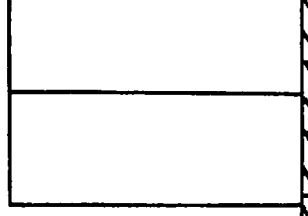


UNIT 26



ENTRANCE

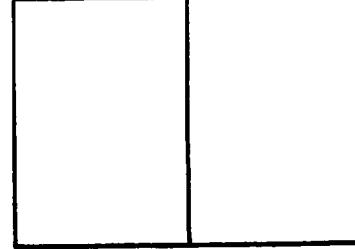
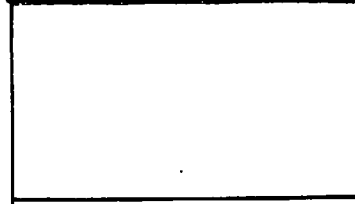
ESTATE ROAD



OSLOTT'S.

ESTATE ROAD AND PARKING

ESTATE ROAD



ESTATE ROAD

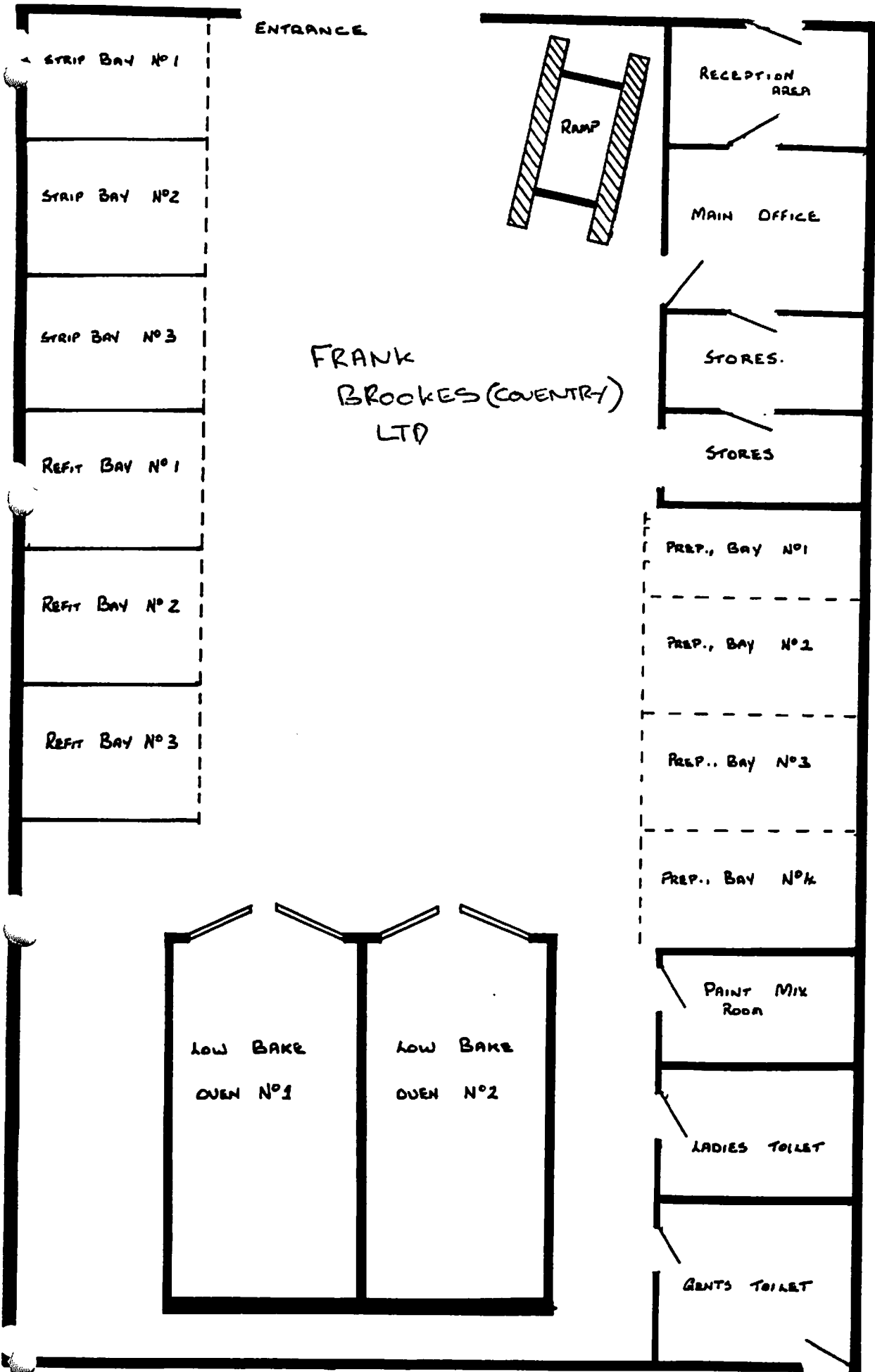
RESIDENTIAL AREA

Urban Design

BILTON IND. ESTATE

Plan 1

ESTATE MAIN ROAD



Plan 2

A/Area Director:  
B W McCORDALL



Chief Environmental Health Officer  
Housing & Environmental Services Directorate  
Broadgate House  
Broadgate  
COVENTRY  
CV1 1NH

Dear Sirs

**ENVIRONMENTAL PROTECTION ACT 1990 PART 1: AUTHORISATION FOR OPERATION OF A PRESCRIBED PROCESS AT FRANK BROOKES (COVENTRY) LTD, UNIT 24, BILTON INDUSTRIAL ESTATE, HUMBER AVENUE, COVENTRY CV3 1JL**

Thank you for consulting the Health and Safety Executive about the above application for paint spraying operation at Unit 24, Bilton Industrial Estate, Humber Avenue, Coventry CV3 1JL, submitted by Frank Brookes (Coventry) 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 1994 (COSHH). Occupational exposure limits for a range of substances have been assigned under COSHH and details of these standards are given in the current edition of Guidance Note EH40, purchasable from Dillons/Rymans book shops.

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

A handwritten signature in black ink, appearing to read 'N. A. Maycock'.

**N A MAYCOCK**  
HM A/Principal Inspector of Factories



**ENVIRONMENTAL PROTECTION ACT 1990, PART 1.**

**THE ENVIRONMENTAL PROTECTION (PRESCRIBED PROCESSES AND SUBSTANCES) REGULATIONS 1991 SI 472.**

**THE ENVIRONMENTAL PROTECTION (APPLICATIONS, APPEALS AND REGISTERS) REGULATIONS 1991, SI 507.**

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

**1. Name, address and telephone number of applicant.**

*Name and number of registered office (if applicable).*

FRANK BROOKES (COVENTRY) LTD  
UNIT 24 BILTON INDUSTRIAL ESTATE  
HUMBER AVENUE COVENTRY CV3 1JL

*Name and address for correspondance (if different from above).*

AS ABOVE

*Name and address of premise where the process is to be carried out (if different from above).*

AS ABOVE

**2. Name and address of local authority in whose area the process will be operated.**

..... COVENTRY CITY COUNCIL .....

.....

.....

.....

**3. Lists of maps or plans enclosed with the application showing where the process is located.**

..... AREA MAP OF LOCATION OF BILTON INDUSTRIAL ESTATE. ....

..... BILTON INDUSTRIAL ESTATE LAYOUT PLAN. ....

..... PLAN OF WORKSHOP PREMISES. ....

..... SITE PLAN OF EMISSION VIEWPOINT AREAS. ....

**4. The Process**

**4.1 A full description of the process operated**

*A sentence briefly describing what is carried out.*

..... THE REPAIR AND REPLACEMENT OF DAMAGED VEHICLE PANELS, .....

..... FILLING, PRIMING AND PAINTING THE SUBSTRATE TO RETURN .....

..... TO AS NEW CONDITION. ....

.....

*A full description of the process:*

..... PROCESS FLOW DIAGRAM INDICATES THE FLOW OF WORK AND THE FLOW .....

..... OF MATERIALS IN PROCESS. ....

.....

.....

## **Methods Of Applying Coatings**

### **Coatings Applied Using:-**

**Conventional Airspray Guns  
HVLG Guns  
Underbody Schulz Gun  
2-Pack Sealer Gun**

## **Curing Coatings**

**Fillers:- Air Dry**

**Primers & Top Coats:- Low Bake Ovens e.g. 30 mins @ 60 deg. C**

## **Raw Materials & Waste**

**Storage of raw materials and waste products as shown on flow diagram.  
Materials covered by existing regulations e.g. petroleum license, copy enclosed.**

## **Coating Materials. Goods Inwards & Dispatch**

**Coating products stored in paint room with solvents and itemised.**

**All waste is disposed of in accordance with the EPA Part 2 Duty Care Regulations.**

**Solvent is reclaimed by use of a Solvent Reclamation Unit with non usable solvents and paint,  
collected by a registered Solvent Collection Company, sample enclosed.**

*The equipment that is used.*

.....SEE LIST SUPPLIED.....  
.....  
.....  
.....

*The materials that are used.*

MATERIALS USED IN THE COATINGS PROCESS ARE ITEMISED IN  
.....  
THE RELEVANT MANUFACTURERS DATA SHEETS IN THIS MANUAL.  
.....  
.....

*The specifications of all products that are used as coatings.*

SPECIFICATIONS OF ALL PRODUCTS USED IN THESE PROCESSES  
.....  
REGARDING HEALTH & SAFETY ACTS ARE INCLUDED IN THE MANUFACTURERS  
.....  
DATA SHEETS IN THIS MANUAL.  
.....  
.....

*Coating and solvent consumption.*

\* DURING THE PROCESS WE CONSUME ..... LITRES OF THE ABOVE  
.....  
MATERIALS PER YEAR, CONTAINING 16.7 KILOS OF SOLVENT.

\* THIS IS MADE UP OF ..... LITRES OF TOP COAT. .... LITRES OF

\* UNDERCOAT ..... LITRES OF FILLER AND ..... LITRES OF OTHER  
.....  
MATERIALS.

\* SUPPLIERS SOLVENT USAGE RECORDS ARE SUPPLIED IN THIS MANUAL.

## **Equipment Used On Premises**

**Various Hand Tools**

**Hydraulic Lift**

**Grinders**

**Paint Brushes**

**Low Bake Ovens (Gas fired)**

**Mig Welders**

**Gun Cleaning Equipment (Fully Enclosed Semi-Automatic System)**

**Under Body (Schulz) Gun**

**Sealer Guns**

**Body Jig - Alignment Equipment**

**Oxyacetylene Equipment**

**Paint Mixing Scheme**

**Spray Booths (Installed Inside Low Bake Ovens)**

**Personal Air-Fed Respiration Equipment**

**Conventional Spray-Gun Equipment**

**HVLP Guns**

### **Spillages**

**Any materials spilled while being handled or stored are cleared up immediately by the member of staff closest at hand.**

### **Coating Emissions & Prevention of Dusts & Solvents**

**All coatings, paint and solvent spraying are carried out using spray booths, which are filtered and extracted. Filters and booths, low bake ovens are under maintenance contract with Spray Booth Services Ltd. Curing of coatings is then completed using low bake ovens, filtered and extracted.**

### **Standby Arrangements**

**In the case of failure of the booth extraction system spraying ceases immediately, and is not continued until the booth is once again operational.**

### **Prescribed Substances Emitted**

**Shown on suppliers read out data in more detail.**

**Oxides of Sulphur & Other Sulphur Compounds.  
Oxides of Nitrogen Compounds.  
Oxides of Carbon.  
Organic Compounds & Partial Oxidation Products.  
Metal, Metalloids and their Compounds.  
Halogens and their Compounds.  
Phosphorus and its Compounds.  
Particulate Matter.  
Silica, Amorphuous & Methoxy Propyl Acetate.**

**(Oxides considerably reduced by the use of Natural Gas for Gas Fired Ovens)**

### Emission Prevention PG 6/34

The majority of particulate matter is contained by arrestment equipment. (Filters).  
The effect of emissions of any residual particulate matter will be mainly visual, i.e. add dust to the environment. As previously stated, filters and booth are regularly maintained under a contract with a company who specializes in this equipment.

### Volatile Organic Compounds VOCs

In general VOC emissions from the respraying of road vehicles are colourless, free from liquid particulate matter and the aim is that all emissions are free from odour at the boundary of our premises. The main environmental effect of VOC emission is that in certain circumstances they contribute to the complex environmental chemistry which results in the development of ozone in the lower atmosphere.

### Techniques to Monitor Emissions

Lists and maintenance schedules carried out on filtration and extraction equipment by Spray Booth Services Ltd.

Interim visual inspection by staff e.g. clogged filters, removal of debris etc.

Odour and visual checks in and around premises for obvious smells or sight of emissions.

Solvent inventory supplied by main supplier on a regular basis, and filed.

### **Objectives Of Company For EPA Act**

**As a responsible business and member of the community, we have fully supported and complied with previous legislation. We are willing to work actively to achieve the implementation of BATNEEC as laid down in guidance note PG6/34 to achieve the objective of preventing/reducing and rendering harmless all of the emissions from our process.**

**As a reputed professional business our company and staff already acknowledge the importance of any emissions to atmosphere from our premises and will ensure that any steps to alleviate them will be STRICTLY adhered to.**



*Additional information that is relevant to this application.*

..... **AS SUPPLIED IN THIS MANUAL.** .....

.....

.....

.....

.....

**5. Name of the newspaper in which it is proposed to advertise the application.**

..... **COVENTRY EVENING TELEGRAPH (COPY ENCLOSED)** .....

**6. Fee enclosed**

**(cheque made payable to COV CITY..... for the sum of £ 985.....)**  
**COUNCIL**

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

.....  ..... (signature)

**MR ANTHONY FARRINGTON** ..... (name in BLOCK CAPITALS)

**MANAGING DIRECTOR** ..... (capacity in which signing)

..... 31-5-99 ..... (date)

**Advertisement to be placed in Coventry Evening Telegraph**

**Notice of Application : Environmental Protection Act 1990 Part I**

**Frank Brookes (Coventry) Ltd has applied for an authorisation from Coventry City Environmental Health Authority to operate a Vehicle Bodywork Repair and Paint Process at the premises of Frank Brookes (Coventry) Ltd, Unit 24, Bliton Industrial Estate, Humber Avenue, Coventry, CV3 1JL.**

**A copy of the application is available for public inspection free of charge, at the Coventry City Council House.**

**Written representations about the application may be sent to Coventry City Council House, Coventry, within 28 days of the advertisement.**

# FRANK BROOKES (Coventry) LTD

CAR & LIGHT COMMERCIAL VEHICLE BODY REPAIRERS & PAINTERS

Unit 24  
Bilton Industrial Estate  
Humber Avenue  
Coventry CV3 1JL  
Tel: 01203 456229/441494  
Fax: 01203 456177

VAT No. 272 4365 57



LOW BAKE OVENS  
FULL JIG FACILITIES



**Royal Insurance**  
APPROVED



**General Accident**  
- REPAIR CENTRE



RESIDENTIAL AREA

RESIDENTIAL AREA

HUMBER AVENUE

JOBS FOR  
COUNTRY.

HUMBER  
PUBLIC HOUSE

ESTATE ROAD

ESTATE ROAD

CAR PARK.

UNIT 26

VISUAL VEIL  
POINTS

DSCOTT'S.

ESTATE ROAD AND PARKING

ENTRANCE.

FRANK BROOKES

FIRE EXIT

EMISSION  
STACKS.

CAR  
PARK

RESIDENTIAL AREA

ESTATE ROAD

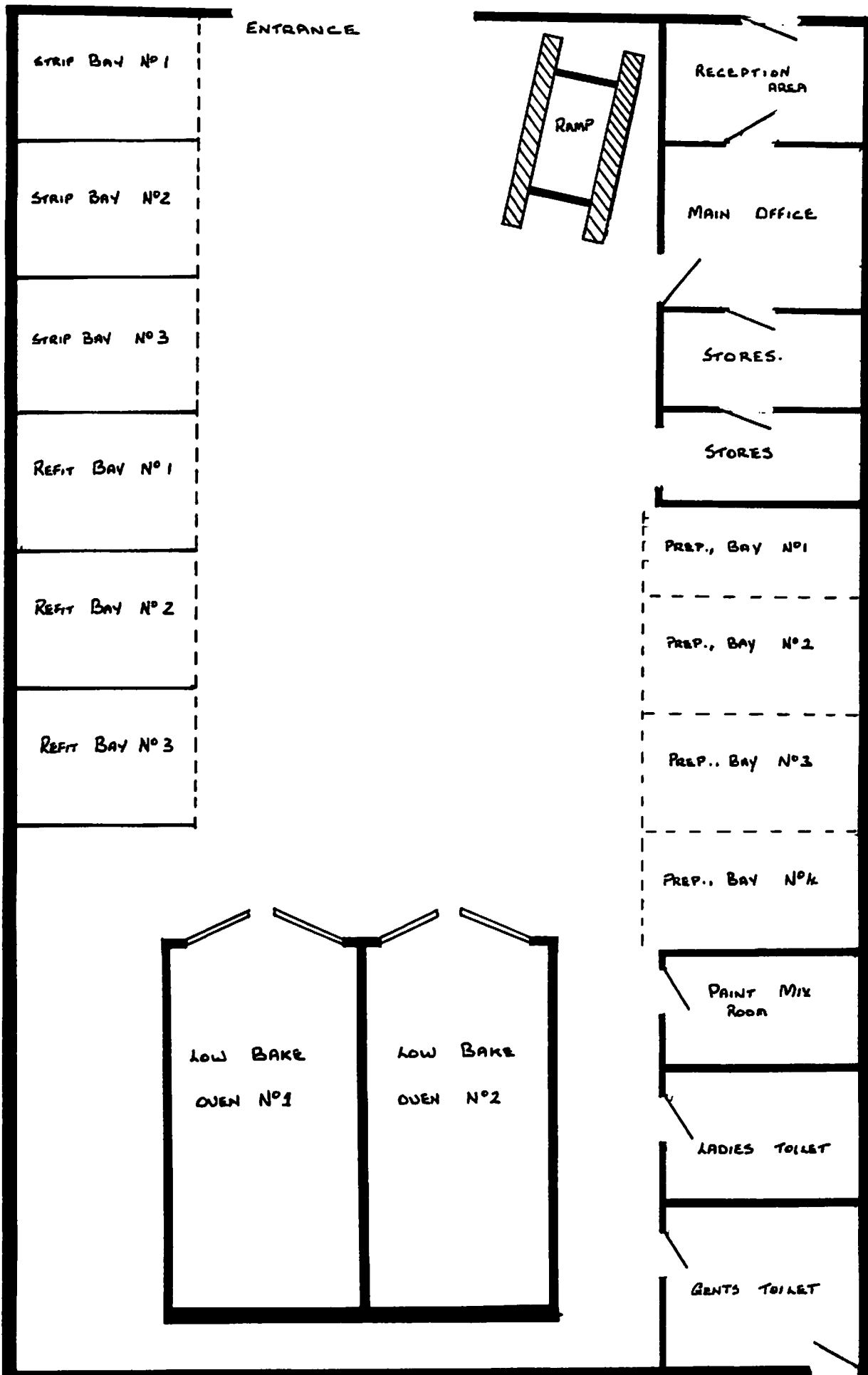
RESIDENTIAL AREA

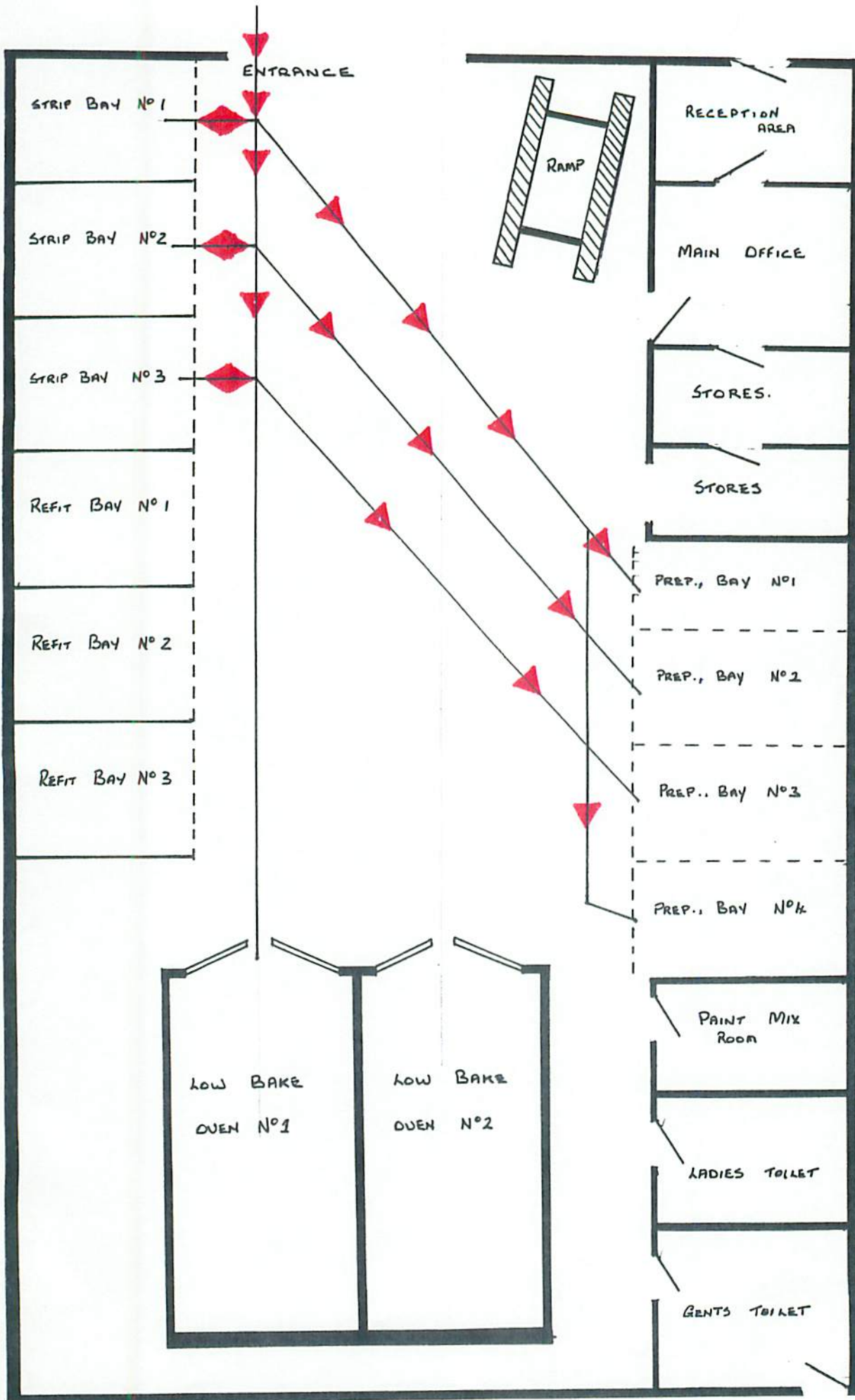
ESTATE ROAD

BILTON IND. ESTATE

U.S. map 2-11

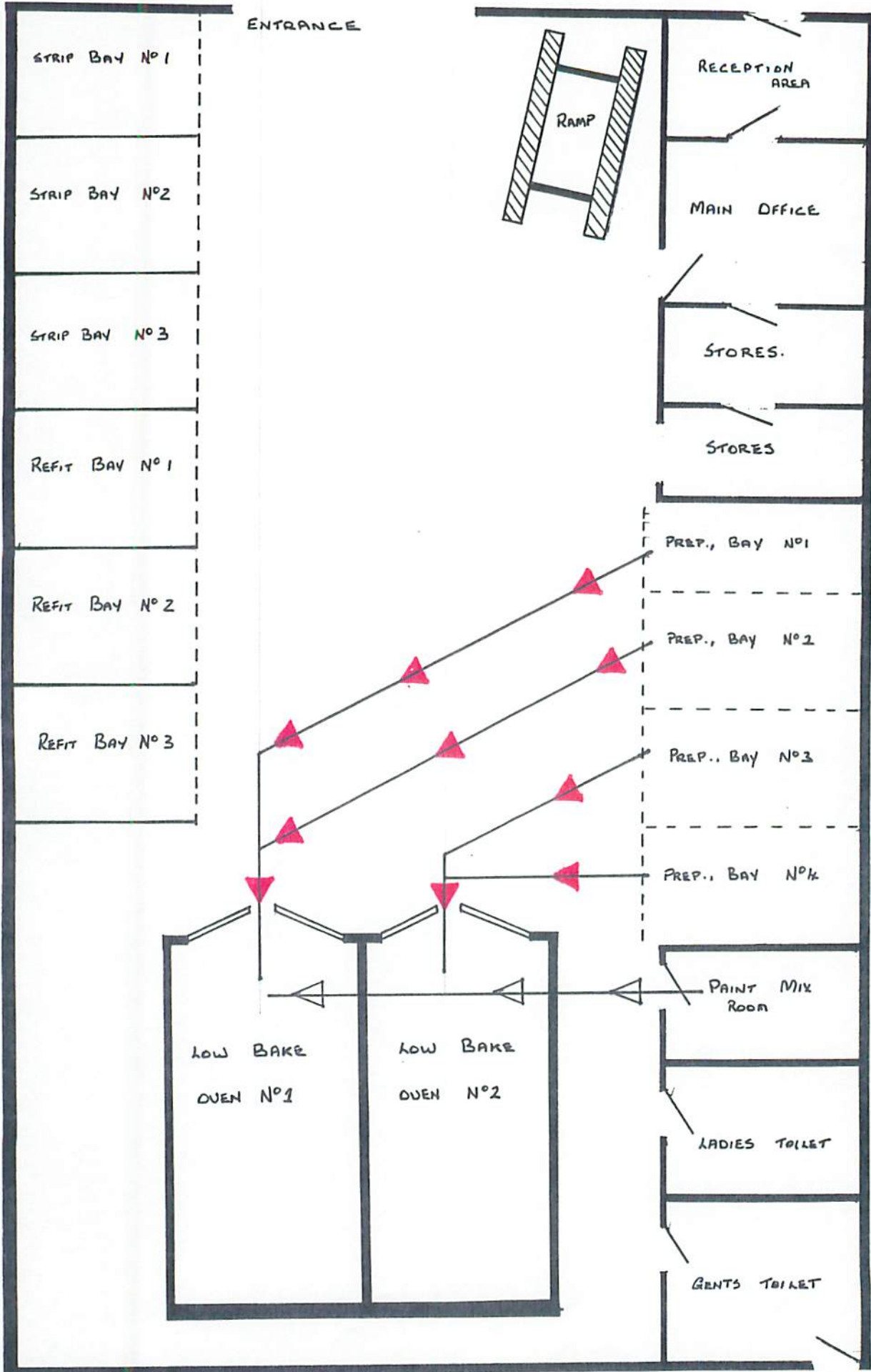
ESTATE MAIN ROAD





VECHICLE PREPARATION FLOW DIAGRAM.

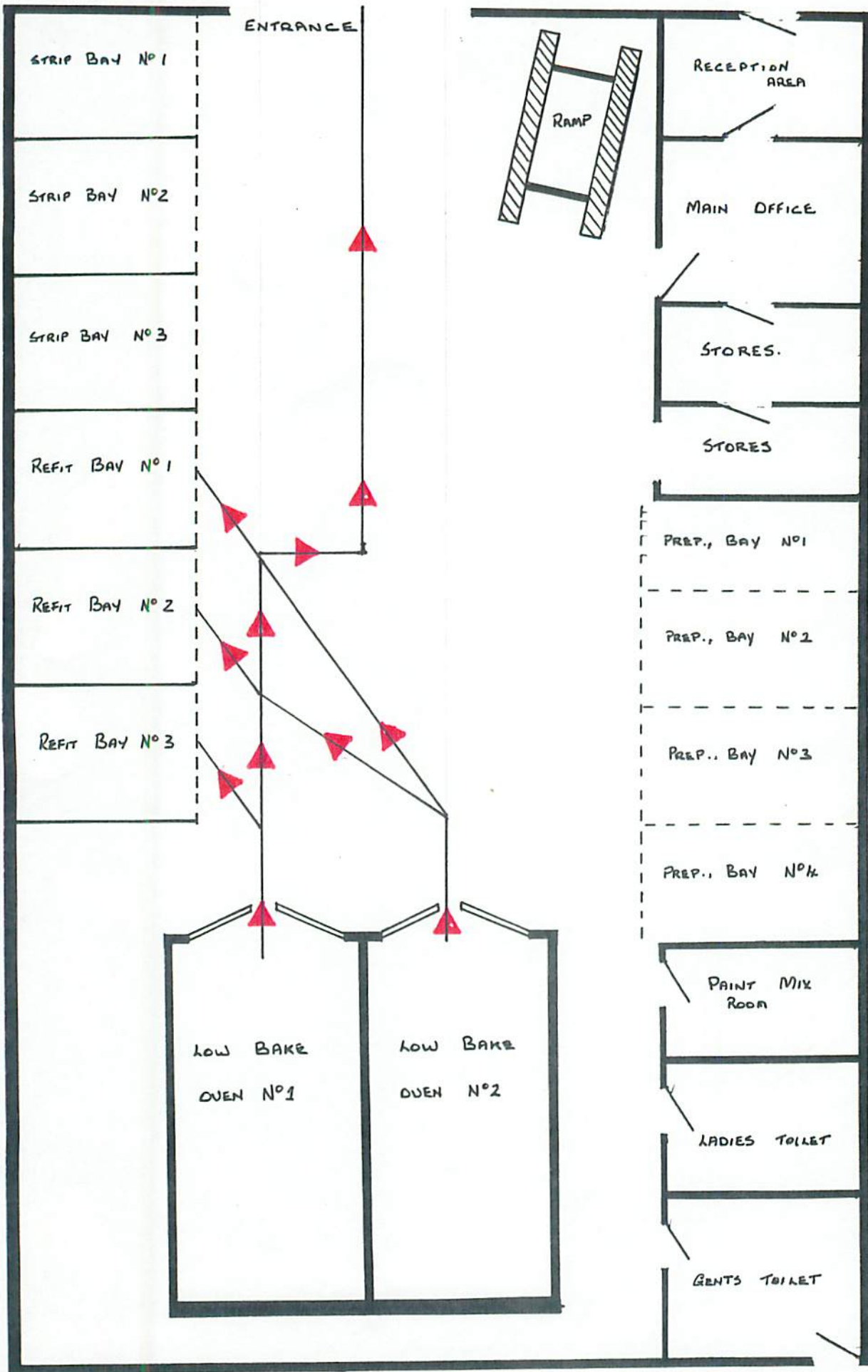
ESTATE MAIN ROAD



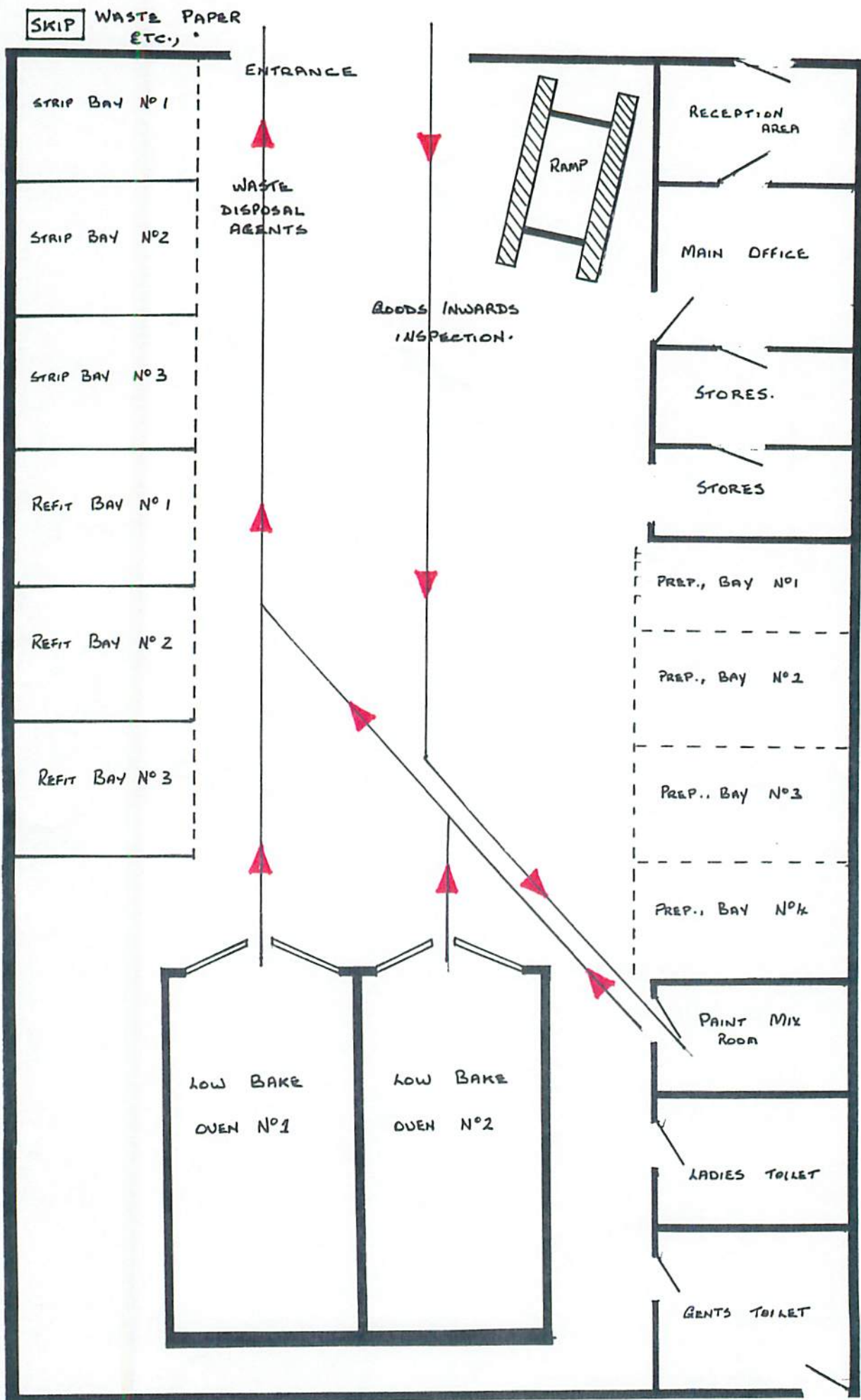
VECHICLE PREPARATION TO PAINT AND LOW-BAKE.



ESTATE MAIN ROAD



VECHICLE PAINT TO REFIT & FINAL FINISH.



GOODS INWARDS & WASTE DISPOSAL FLOW DIAGRAM.

Producer's Certificate

A

(1) The material described in B is to be collected from FRANK BROOKS LTD  
UNIT 92B SMITHS IND ESTATE HUNGERFORD GLOUCESTERSHIRE  
and (2) taken to BARCLAYS  
HALL STATION STATION RD COVENTRY GLOUCESTERSHIRE  
Signed: C.M. COLE Name: C.M. COLE  
On behalf of FRANK BROOKS Position: SALES  
Address and telephone UNIT 92B Date: 27.6.94  
SMITHS IND ESTATE COVENTRY Estimated date of collection: 6.7.94

Description of the Waste

B

- (1) General description and physical nature of waste LIQUID USED SOLVENTS
- (2) Relevant chemical and biological components and maximum concentrations CELLULOSE THINNERS & PAINT SOLIDS
- (3) Quantity of waste and size, type and number of containers 5 x 25L
- (4) Process(es) from which waste originated CAR REPAIR WORKSHOPS

Carrier's Certificate

C

I certify that I collected the consignment of waste and that the information given in A(1) & (2) and B(1) & (3) is correct, subject to any amendment listed in this space:  
I collected this consignment on 1.7.94 at 10.40 hours  
Signed: [Signature] Name: [Signature] Vehicle Registration No.  
On behalf of Bancroft Motor Factors Ltd  
Address and telephone: [Signature] Date: [Signature]

Producer's Collection Certificate

D

I certify that the information given in B & C is correct and that the carrier was advised of appropriate precautionary measures.  
Signed: [Signature] Name: [Signature] Telephone: [Signature] Date: [Signature]

Disposer's Certificate

E

I certify that Waste Disposal Licence No. [Signature] issued by [Signature] County/  
District Council, authorises the treatment/disposal at this facility of the waste described in B (and as amended where necessary at C).  
Name and address of facility [Signature]  
This waste was delivered in vehicle (Reg. No.) [Signature] at [Signature] hours on  
(date) [Signature] and the carrier gave his name as [Signature] on behalf of [Signature]  
Proper instructions were given that the waste should be taken to [Signature]  
Signed: [Signature] Name: [Signature] Position: [Signature]  
Date: [Signature] on behalf of [Signature]

For use by Producer/Carrier/Disposer

WASTE CARRIER REG. NO.  
WA/L601/0187

