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Coventry City Council

City Services
Public Protection

Environmental Health
Environmental Protection
Broadgate House
Broadgate
Coventry
CV1 1NH

Telephone 024 7683 1834
Fax 024 7683 1840

Please contact Rachel Field
Direct line 024 7683 1858
Fax 024 7683 1831
rachel.field@coventry.gov.uk

The Company Secretary
John Astley and Sons Ltd
Gosford Street
Coventry
CV1 5DJ

1 December 2005

Dear Sir

Pollution Prevention and Control (England and Wales) Regulations 2000
Permit to operate a Prescribed Installation: permit ref. 029

I refer to the above and enclose your Revocation Notice under regulation 21 of the above legislation.

I draw your attention to your right to appeal against the notice. Guidance attached to the Notice outlines the appeal process.

If you require further information please telephone me on the number above.

Yours faithfully

[redacted]

Rachel Field
Principal Environmental Health Officer

Director of City Services
Stephen L Pickering
Head of Service
Michael J Green
Head of Public Protection

Coventry City Council

PPC Permit ref:- PPC/029
Revocation ref: 001

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

Revocation Notice

To The Company Secretary
John Astley and Sons Ltd
Gosford Street
Coventry
CV1 5DJ

Coventry City Council ("the Council), in the exercise of the powers conferred upon it by regulation 21 of the Pollution Prevention and Control (England and Wales) Regulations 2000[1] ("the 2000 Regulations") hereby gives you notice as follows-

The permit reference PPC/029 is hereby revoked with effect from 30th December 2005

Signed on behalf of Coventry City Council

[redacted]

Date... 1st December 2005

An authorised officer of the Council

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

Guidance for operators receiving a Revocation Notice

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

Dealing with a Revocation Notice

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

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

Appeals

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

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

How to appeal

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

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

- a copy of any relevant correspondence between the appellant and the regulator; and
- a copy of any decision or notice, which is the subject matter of the appeal.

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

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

Where to send your appeal documents

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

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

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

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

Costs

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

Offences

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

Coventry City Council

PERMIT REFERENCE: PPC 029
John Astley and Sons Ltd

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

Process Address	Far Gosford Street Coventry CV1 5DJ
Process Type	Coating Manufacture
Current Operator	John Astley and Sons Ltd
Previous Operator	n/a
Date of Application	1st April 2004
Date Permit Issued	31st January 2005

Coventry City Council

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

DOCUMENT A : PERMIT

John Astley & Sons Ltd

Reference Number **PPC/029**

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:

John Astley & Sons Ltd

Whose registered office is:

Far Gosford Street
Coventry
CV1 5DJ

to operate a Part B installation involving a coating activity, as prescribed in Section 6.5 Part B of Schedule 1 to The Regulations, at:

John Astley & Sons Ltd
Far Gosford Street
Coventry
CV1 5DJ

The permit is subject to the conditions specified in this document consisting of 14 pages and comprising documents A, B and C, plans PPC/029/A, PPC/ 209/B and Appendix 1.

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

Dated ....31st January 2005.....

SCOPE

The installation comprises not just any relevant unit carrying out a Part B activity listed in Schedule 1 to the Regulations, but also directly associated activities which have a technical connection with that activity and which could have an effect on pollution.

All pollutant concentrations shall be expressed at reference conditions of 273K and 101.3kPa, without correction for water vapour content.

Technical Guidance documents used in the preparation of this document:

- Secretary of States Guidance Note PG6/44(04) – Manufacture of Coating Materials
- 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 shown on the attached plan PPC/029/A. The Installation boundary is marked in red on the attached plan PPC/ 029/A. The internal layout of the installation is shown on the attached plan PPC/ 029/B.

Description of Installation

- Xylene, white spirit and other solvents are delivered to and stored in underground storage tanks. Other solvents contained in 200 litre drums are delivered and stored in the flammable stores.
- Resins are delivered to and stored in the flammable stores.
- Pigments are delivered to and stored in the pigment storage area.
- Raw materials are moved from storage areas to points of use via fork lift truck.
- Colour pigments are ground in 6 steel mills; 2 porcelain mills; 2 mono mills and 12 bead mills.
- Pigment is mixed with solvents and the paint finished in 6 high-speed dispersers and 13 mixers and rotor mixers.
- Intumescent paints are mixed in 5 mixing vessels with associated high or low speed drives.
- Final products are stored in the flammable.
- Machines and holding vessels are cleaned with xylene employing manual cleaning techniques.

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	Powder/Pigment weighing area in Pigment store	Particulates	1.3, 2.8	DCE Sintamatic ceramic filter system
2	Production Areas	VOC's Particulates	1.4	None DCE Sintamatic ceramic filter system

DOCUMENT B

CONDITIONS

All conditions shall have immediate effect unless stated otherwise.

1.0 EMISSION LIMITS AND CONTROLS

1.1 All emissions to air shall be free from offensive odour outside the installation boundary, as perceived by the local Authority Inspector.

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

1.3 The emission concentration of particulates from the exhaust stacks of the DCE dust extraction units known as PE1 and PE3 shall not exceed 50mg/m^3.

1.4 The mass emission of volatile organic compounds from any emission source shall not exceed 1kg in any 8-hour period on an aggregate basis.

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

2.0 MONITORING, SAMPLING AND MEASUREMENT OF EMISSIONS

2.1 The differential pressures of the three DCE sintamatic dust filter units shall be checked on a weekly basis. Any adverse results shall be investigated immediately and if necessary the filter units shall not be operated until the cause of the adverse results has been identified and remedied. The results of such checks including any remedial action taken shall be recorded in the dust filter log-book. This log-book shall be retained on site for a minimum of 2 years and shall be made available to the Local Authority Inspector on request.

2.2 A determination of the organic solvent consumption, shall be made and submitted to the local Authority every 12 months in the form of a mass balance preferably to coincide with the operators stock taking requirements.

2.3 To demonstrate compliance with clause 1.4 emissions of volatile organic compounds from all emission sources (except the bulk solvent storage tanks) shall be continually monitored using a Signal 3000 series flame ionisation detector.

2.4 The Signal 3000 series flame ionisation detector shall be calibrated once every day. The calibration shall be recorded in a log-book and shall detail the date and time the calibration took place and any problems noted, to include any remedial action taken where

appropriate. Records of calibration shall be kept on site for a minimum of 2 years.

2.5 The Signal 3000 series flame ionisation detector shall be serviced once every 6 months to ensure proper working order. Service records shall be kept and include the date of the service, any faults noted and remedial action taken where appropriate. Records shall be kept on site for a minimum of 2 years.

2.6 A summary of the continuous monitoring required by clause 2.3 shall be submitted to the Local Authority once in every 12 month period and shall include:

a. Details of the average, maximum and minimum mass emissions measured in each month of the previous 12 months.
b. Any exceedances of the mass emission limit specified in clause 1.4 in the previous 12 months and if this is the case what emission sources were in operation at the time of this exceedance.
c. The emission sources in operation during the periods to which the maximum and minimum mass emissions outlined in part (a) above are applicable.

2.7 The mass emissions from the bulk solvent storage tanks show on plan PPC/029/B shall be calculated once in every 12 month period and the methodology of the calculations and the subsequent results shall be submitted to this Local Authority within 8 weeks of the calculation being undertaken.

2.8 To demonstrate compliance with clause 1.3, the operator has submitted manufacturers written guarantees supported by test data, and shall undertake the weekly checks outlined in clause 2.1. Should these tests not be carried out as outlined, or adverse results indicate that the filters are not in good working order, or the servicing required by clause 2.10 is not carried out, the operator shall undertake emissions monitoring of particulate emissions from the stacks known as PE1 and PE3 to demonstrate compliance with the emission limit in clause 1.3.

2.9 At least 7 days prior to the emissions monitoring required by clause 2.8 the operator shall notify the local authority of the provisional date of monitoring, and the methods to be used. The monitoring results shall be submitted to the local authority within 8 weeks of monitoring taking place.

2.10 The three DCE sintamatic dust filter units shall be serviced to ensure proper working order every twelve months and if necessary maintenance or repairs undertaken. Service records shall be retained on site for a minimum of 2 years and shall detail any maintenance or repair work undertaken. Such records shall be made available to the Local Authority Inspector on request.

3.0 OPERATIONAL CONTROLS

3.1 The cleaning of ball mills and bead mills shall only be carried out through the use of closed loop cleaning techniques.

3.2 The cleaning of all other equipment shall only be carried out while the solvent extraction system is in operation.

3.3 At least once every 2 years cleaning operations involving organic solvents shall be reviewed to identify opportunities for reducing VOC emissions, and a report shall be submitted to the local authority on the findings of the review.

3.4 The mixing of paint shall only be undertaken whist the extraction systems are in operation.

3.5 The mixing and finishing of paints in the 6 high-speed drives and 13 mixers shall only be carried out when these vessels are fully covered.

3.6 The steel mills and bead mills shall be continually fed with chilled water during operation to prevent overheating.

3.7 All containers that hold material that contains organic solvents shall be stored closed or lidded. Empty 200 litre barrels shall be washed and/or drained fully and stored next to the area marked 5 on plan PPC/029/B.

4.0 STACKS, DUCTS AND PROCESS VENTS

4.1 Emissions from the dust extraction system must only be vented to atmosphere via the DCE sintamatic dust arrestment equipment.

5.0 GENERAL OPERATIONS

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

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

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

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

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

5.6 Effective preventative maintenance shall be employed on all aspects of the activity/process including all plant, buildings and the equipment concerned with the control of emissions to air. A written maintenance programme shall be implemented and be made available to the local authority inspector on requests.

6.0 COMPLIANCE WITH SOLVENT EMISSIONS REGULATIONS

6.1 The operator shall identify products or materials that are/contain risk phrased substances/materials R45, R46, R49, R60 and R61 and formulate and implement a timetable to replace, control and limit designated risk phrase materials as soon as possible, as defined and agreed by the Local Authority.

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

1) By 31st October 2007 achieve the following VOC emission limits expressed as total mass of organic carbon:

Organic solvent consumption >100 tonnes and <1000 tonnes

Release Point	Emission Limit
Waste gases from oxidation plant used as abatement	50 mg/Nm3
Any other waste gases	75 mg/Nm3

Fugitive Emission Limit Value = 5 % of organic solvent input

Organic solvent consumption >1000 tonnes

Release Point	Emission Limit
Waste gases from oxidation plant used as abatement	50 mg/Nm3
Any other waste gases	75 mg/Nm3

Fugitive Emission Limit Value = 3 % of organic solvent input

Or

2) By 31st October 2007 achieve the following total emission limits, where the total emission is equal to the mass of organic solvent released in the waste gases plus the fugitive releases:

Solvent consumption	Total Emission Limit
>100 tonnes and <1000 tonnes	5% of organic solvent input
>1000 tonnes	3% of organic solvent input

Compliance with option 2 can be demonstrated by the completion and submission of the VOC workbook supplied by the British Coatings Federation.

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/ 029 but contain guidance relevant to the Permit.

Inspections and Powers of Entry

Regular inspections will be carried out by officers of the Council (the Local Authority Inspectors) to check and ensure full compliance with the Permit conditions and residual duties. These inspections may be carried out without prior notice.

Under section 108(6) of the Environment Act 1995 authorised Local Authority Inspectors have been granted powers of entry into any premises for the purposes of discharging relevant duties.

Reviews

The Local Authority has a statutory duty to review the permit at least once every 6 years or in the following circumstances set out in regulation 15 of the Pollution Prevention and Control regulations 2000:

a) The pollution from the installation is of such significance that the existing emission limit values for the permit need to be revised or new emission limit values need to be included in the permit
b) Substantial changes in BAT make it possible to reduce emissions from he installation or mobile plant significantly without imposing excessive costs; or
c) Operational safety of the activities carried out in the installation or mobile plant requires other techniques to be used

Health and Safety

This Permit is given in relation to the requirements of the Pollution Prevention and Control (England and Wales) Regulations 2000. It must not be taken to replace any workplace responsibilities the operator has under Health & Safety legislation. Whenever emission limits quoted in this Permit conflict with occupational exposure limits set under the Health and Safety at Work Act 1974 to secure the health, safety or welfare of persons at work, the tighter limit should prevail.

Installation must be operated in order to protect persons at work as well as the environment. In achieving conditions in this Permit the operator must not adopt any course of action that would put at risk the health, safety or welfare of persons at work.

Other Statutory Requirements

This Permit does not detract from any other statutory requirement, such as the need to obtain planning permission, hazardous substances consent, discharge consent from the Environment Agency, building regulations approval, or a waste disposal licence.

This Permit does not authorise a contravention of any other enactment or any order made, granted or issued under any enactment, nor does it authorise a contravention of any rule or breach of any agreement.

The Operator is advised to consult the relevant Planning Department regarding changes that may be required as a result of this Permit (e.g. stack heights) as they may require planning permission.

Transfer of Permits

Where the operator of an installation wishes to transfer, in whole or in part, his permit to another person, the operator and the proposed transferee shall jointly make an application to the regulator to effect the transfer. The permit shall accompany such an application and any fee prescribed in respect of the transfer.

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

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

Variation to Permits

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

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

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

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

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

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

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

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

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

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

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

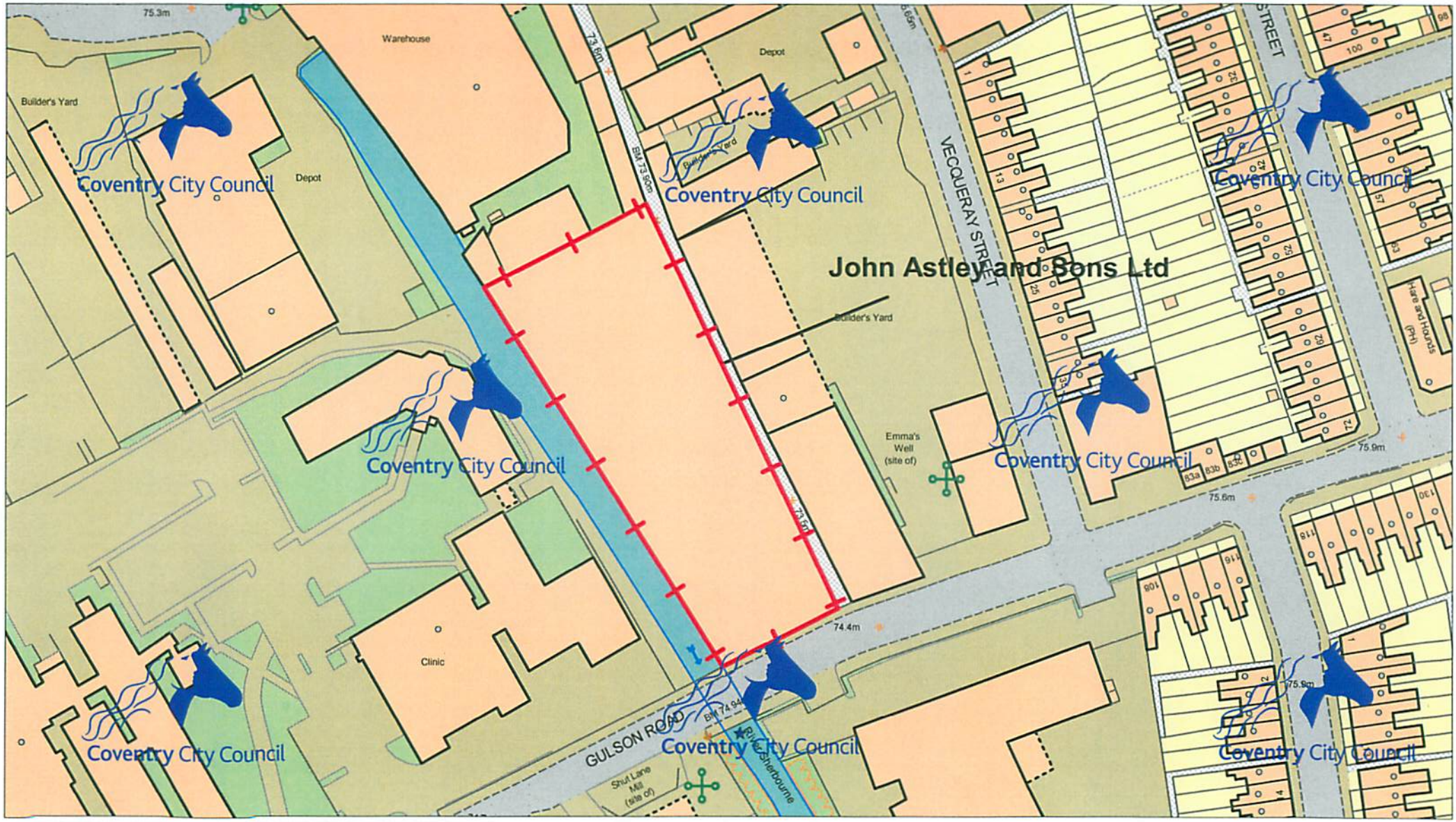
Protocols ensure that the sampling procedures are carried out correctly and that the results obtained accurately characterise the process.

The main components of a Protocol are as follows:-
1. Calibre and quality of the sampling team.
2. A reference measurement method (standard methods may not always be available)
3. A standard methodology setting out:

- health and safety considerations
- pollutants of interest
- plant operating conditions required
- selection and location of sampling position

- sampling characteristics (e.g. isokinetic etc) and techniques
- sampling frequency
- sampling duration
- number of samples
- type (including make and model), condition and suitability of sampling equipment
- required accuracy
- variability of emissions
- analytical methods including laboratory competence and NAMAS accreditation certificate copy for each pollutant of interest
- analytical precision
- procedures to be adopted if standard methods unavailable
- calibration certificate(s) for sampling equipment
- Quality Control and Quality Assurance procedures
- Presentation of results and associated information.

Plan PPC/029/A



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

Tel: 024 7683 1832
Fax: 024 7683 1840

DERMNJAL

Astleys

JOHN ASTLEY & SONS LTD

ESTABLISHED IN 1730

APPLICATION FOR INITIAL AUTHORISATION

The Industrial Paint Division of John Astley & Sons Ltd is involved in the manufacture of paint and other coating materials using more than 100 tonnes per annum of organic solvent.

This application is therefore submitted under Schedule 1 Section 6.6.b. of The Environmental Protection (Prescribed Processes and Substances) Regulations 1991.

Applicant :- John Astley and Sons Ltd.
Far Gosford Street
Coventry CV1 5DJ

Local Authority :- Coventry

Included in this application :-

- Description of process
- Equipment list (4 pages)
- Plan of whole company with key to relevant areas
- Map showing company in relation to surrounding area
- Map of paint manufacturing area with equipment locations

On the plan of the whole company, areas 1-14 are indicated. The only areas producing sufficient emissions to be considered under the Regulations are areas 3,7 and 10.

An application fee of nine hundred pounds is enclosed.

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

[redacted]

Roger Astley
Managing Director

8 July 1992

Directors Michael Astley Roger Astley Jeannette Astley Secretary Madge Adams
24hr Answering Service VAT No 272 3323 78 Eng Reg No 35885

GOSFORD STREET COVENTRY CV1 5DJ
TEL 0203 220771 FAX 0203 525608

DESCRIPTION OF PROCESS FOR ASTLEY PAINTS

Raw Materials

Bulk delivery — venting to filter or tanker
Bunding

Solvent - hydrocarbons, alcohols, ketones - bulk storage is in underground tanks and smaller quantities are stored in 200 litre barrels on racks in a "flammable store".

Resin - alkyds and other synthetics in solvent - mostly kept in 200 litre barrels as for solvent. Nitrocellulose is used, but volumes are reducing.

Pigment - carbon black, titanium dioxide, lead chromates, iron oxides, organics and extenders - mostly in 25 Kg bags on pallets.

Others - additives, driers etc - generally quantities are very small in comparison with first three categories.

Information is kept on all RMs, relating to Health and Safety, technical properties and other matters of special interest.

Manufacture of product

1kg / 8hr day.
1 central discharge point.

Paint, the main product, is made by grinding the above raw materials in various different machines e.g. ball mills, bead mills. The ground paint is finished on mixing machines and then filled into containers sized from 5 to 1500 litres. The finished product is stored until ready for despatch.

Quantities of solvent are filled into containers as required for sale as thinners.

Waste

Due to re-use of cleaning materials, waste is kept to a minimum. All "controlled" waste is stored in 200 litre barrels until it is transported to a licenced site.

Emissions

The most significant emission from the factory is xylene vapour which usually accounts for 80-90% of emitted VOCs. The remainder is made up of vapours from up to 20 different solvents, some very rarely used.

Emission Abatement Techniques

Dust is removed from the air by a filter with a very high efficiency. The reduction of solvent vapour emission is a matter that receives continuing attention. Methods used to reduce emissions include the use of better lids, less intensive mixing of the paint where possible and a system of chilling mixing vessels.

PLANT REGISTER

BALL MILLS

SM 1 RED STEEL MILL
SM 2 BLACK STEEL MILL
SM 3 LG STEEL MILL
SM 4 SMALL STEEL MILL
SM 5 GREEN STEEL MILL
SM 6 RED STEEL BELT DRIVE MILL - CONVERTED TO PM6
SM 7 BLACK STEEL MILL

PM 1 BLACK PORCELAIN MILL
PM 2 WHITE PORCELAIN MILL
PM 3 GREY PORCELAIN MILL
PM 4 YELLOW PORCELAIN MILL
PM 5 SPARE PORCELAIN MILL
PM 6 PORCELAIN MILL EX SM

OTHER MILLS

MM 1 MINI MONOMILL
MM 2 No 3 MONOMILL
MM 3 No 4 MONOMILL
EM 1 MINI EIGERMILL
EM 2 EIGERMILL

COMPRESSORS AND RECEIVERS

AC 1 AIR COMPRESSOR 68
AC 2 AIR COMPRESSOR 23
AC 3 AIR COMPRESSOR - GLADIATOR
RT 1 RECEIVER TANK (MAIN)
RT 2 RECEIVER TANK (GLADIATOR)

→ regulating tank for compressor.

LAB EQUIPMENT

SS 1 SALT SPRAY CABINET
HC 1 HUMIDITY CABINET
OV 1 OVEN

SCALES

SC1 - BIZERBA AS500HS/L200 FLOOR DIGITAL - CAP 3000KG - NO 1006755
SC2 - SARTORIUS UNIV DIGITAL SCALES - CAP 1KG - NO 116947
SC3 - AVERY AS2104 SCALES - CAP 200G - NO 116943
SC4 - AVERY 3205 ABA STEELYARD - CAP 210KG - NO 500303
SC5 - AVERY 3205 ABA STEELYARD - CAP 500KG - NO S494754
SC6 - AVERY AS112 STEELYARD - CAP 500KG - NO 5030
SC7 - WEIGHMASTER AS3305CYA DIAL - CAP 50KG - NO 66586
SC8 - WEIGHMASTER AS3305CYA DIAL - CAP 50KG - NO 68652
SC9 - AVERY 3208BGA GROUND SCALES - CAP 750KG - NO 631731
SC10 - AVERY 3303COB DIAL - CAP 25KG - NO S723770
SC11 - OHAUS SCALES AS2108 - CAP 5KG - NO 3
SC12 - AVERY 282 STEELYARD - CAP 210KG - NO 5135-50
SC13 - SARTORIUS 1216MP DIGITAL - CAP 1200G - NO 3005068
SC14 - AVERY 3303COB DIAL - CAP 30KG - NO 580312-5
SC15 - AVERY 3308FFC DIAL/ELECTRIC - CAP 60KG - NO 769207
SC16 - AE AS1760 - CAP 45KG - NO 125040
SC17 - AVERY 3205ABA STEELYARD - CAP 250KG

FLUID HANDLING

WT 1 WHITE SPIRIT TANK
WP 1 WHITE SPIRIT PUMP
WM 1 WHITE SPIRIT METER
WH 1 WHITE SPIRIT NOZZLE AND HOSE

CT 1 CELLULOSE TANK 1
CT 2 CELLULOSE TANK 2
CT 3 CELLULOSE TANK 3
CT 4 CELLULOSE TANK 4
CT 5 CELLULOSE TANK 5
CT 6 CELLULOSE TANK 6
CT 7 CELLULOSE TANK 7

CP 1 CELLULOSE PUMP 1
CP 2 CELLULOSE PUMP 2
CP 3 CELLULOSE PUMP 3

CM 1 CELLULOSE METER 1
CM 2 CELLULOSE METER 2
CM 3 CELLULOSE METER 3

CH 1 CELLULOSE NOZZLE AND HOSE 1
CH 2 CELLULOSE NOZZLE AND HOSE 2
CH 3 CELLULOSE NOZZLE AND HOSE 3

TT 1 TRICHLOROETHYLENE TANK
TP 1 TRICHLOROETHYLENE PUMP
TM 1 TRICHLOROETHYLENE METER
TH 1 TRICHLOROETHYLENE NOZZLE AND HOSE

} No chlorinated solvents used.

EXTRACTION UNITS

PE 1 POWDER EXTRACTION UNIT 80 CUBIC METRES
PE 2 POWDER EXTRACTION UNIT 24 CUBIC METRES
FE 1 FUME EXTRACTION 1
FE 2 FUME EXTRACTION 2
FE 3 FUME EXTRACTION 3
FE 4 FUME EXTRACTION 4
FE 5 FUME EXTRACTION 5
FE 6 FUME EXTRACTION 6
FE 7 FUME EXTRACTION 7
FE 8 FUME EXTRACTION 8

MIXERS & H.S.D.'s

MX 1 15 H.P. TORRANCE
MX 2 KEENOCK MIXER IN CELLULOSE
MX 3 H.V.S. MASTERMIX
MX 4 MECHANICAL MIXER SMALL SINGLE SPEED
MX 5 HAEFFNER H.S.D. (NULLIFIRE)
MX 6 HAEFFNER H.S.D.
MX 7 NULLIFIRE MECHANICAL MIXER - DET SHAFT
MX 8 NETZSCH H.S.D.
MX 9 PADDLE MIXER (OBSOLETE)
MX 10 PADDLE MIXER (OBSOLETE)
MX 11 GREAVES MIXER & AGITATOR 3T
MX 12 HOLDING TANK & MIXER 3T
MX 13 ROTAMIX AND TANK
MX 14 GREAVES MIXER AND TANK (EIGER)
MX 15 GREAVES ROTOR-STATOR
MX 16 FOUR WAY MIXER
MX 17 HOLDING TANK & MIXER (EIGER)

DIAPHRAGM PUMPS

DP 1 MONOMILL No 4 DIAPHRAGM PUMP
DP 2 NULLIFIRE DIAPHRAGM PUMP
DP 3 GREAVES MIXER DIAPHRAGM PUMP
DP 4 TROLLEY No 1 DIAPHRAGM PUMP
DP 5 TROLLEY No 2 DIAPHRAGM PUMP

GENERAL PUMPS

GP1 3 INCH VANE PUMP ON 3T
GP2 2 INCH VANE PUMP ON 3T

LAB ROLLERS

LR 1 DOUBLE LAB ROLLERS
LR 2 FIXED SPEED LAB ROLLERS
LR 3 VARI-SPEED LAB ROLLERS

WELDERS

AW 1 ARC WELDER
AW 2 MIG WELDER
OW 1 OXYGEN GAS WELDER

BARREL TUMBLER

BT 1 BARREL TUMBLER

SPRAY BOOTHS

SB 1 AIRLESS SPRAY UNIT
SB 2 SPRAY BOOTH

} Testing only.

CHILLERS

CU 1 CHILLER UNIT (MAIN)
CU 2 CHILLER UNIT (BOOST)

INDEPENDENT SYSTEMS

HS 1 HEATING SYSTEM
ES 1 EARTHING SYSTEM
ME 1 MAINTENANCE, WORKSHOP EQUIPMENT
VS 1 EXTRACTION EQUIPMENT
AMC 1 AERO MECHANICAL CONVEYOR (FOR MX 14)
AMC 2 AERO MECHANICAL CONVEYOR (FOR MX 11)

LIFTING TACKLE

LT 1 NULLIFIRE HOIST 1
LT 2 LIFTING TACKLE FOR MX 15
LT 3 CELLULOSE HOIST
LT 4 RAMP
LT 5 COOLEY
LT 6 PALLET TRUCK
LT 7 PALLET TRUCK
LT 8 PALLET TRUCK

FLUID HANDLING

XT 1 XYLENE TANK 1
XT 2 XYLENE TANK 2
XT 3 XYLENE TANK 3

XP 1 XYLENE PUMP 1
XP 2 XYLENE PUMP 2

XM 1 XYLENE METER 1
XM 2 XYLENE METER 2

XH 1 XYLENE NOZZLES AND HOSES
XH 2 XYLENE NOZZLES AND HOSES

Astleys
JOHN ASTLEY & SONS LTD
ESTABLISHED IN 1730

Housing and Environmental Services Directorate
Broadgate House
Broadgate
Coventry
CV1 1NH

20th September 1994

For the attention of M P Brock

Dear Mr Brock

Further to your letter dated 25th August 1994, reference EH/EP/MPB, please find enclosed the modified version of our upgrading plan.

I hope this final version meets with your approval, however, should any further changes be required, please do not hesitate to contact me.

Yours sincerely

[redacted]

Roger Astley
Managing Director

This programme indicates, as far as is possible at present, how the following requirements will be achieved before April 1999 :-

All emissions of VOCs and particulate matter to be below a limit of 50mg/cu M OR less than 1kg per 8 hour period per emission source.

Emissions to be monitored to prove compliance with limits.

Records to be kept to show the above has been achieved.

To help identify problem areas, the company's products/processes will be split into four categories :-

1. Negligable emissions
2. Emissions below 1kg/8hr
3. Borderline between 2 and 4
4. Emissions above 1kg/8hr.

If possible, all products/processes will be brought within categories 1 and 2. This can be achieved by various means, the following being the most obvious at present :-

An increasing proportion of product manufactured is water-based. The emission from these processes is negligable.

Cooling of product in process leads to reduced emission. Greatly increased cooling capacity has been installed and this will be applied to processes as soon as possible.

Enclosed processing also reduces emissions and, where applicable, this method will be used.

If it becomes clear that there are products still falling into category 4, and if we need to continue manufacturing those products, then a method of reducing the VOC content of the emissions will be used. It is most likely that catalytic incineration will be chosen as the best method. A decision on this will not be taken until 1997 for reasons laid out below.

At present, the company's production systems are in a process of continuous change, mostly due to the effects of EPA and other environmental considerations on our customers. The company does not have a fixed range of products, it produces what is required at any time by those companies who choose to deal with us. The trend towards water-based paints many accelerate as customers are forced to make a choice or it may be reversed by an improvement in high solids solvent-based technology.

A committment to water-based production has been made on the recently purchased site, but the old production facility cannot be completely upgraded until it is decided what products are to be made. However, changes are being made to satisfy other legislation and, where relevant (eg ventilation systems), very careful consideration is being given to the requirements of the EPA that may be applicable to the processes as they will be in a few years.

Whilst the changes are being made to the production facility, there will be many opportunities to reduce VOC emissions from the present levels. The following changes and methods of monitoring their effects are currently being considered for action during 1994-1996.

1. The efficiency of ventilation to be improved to avoid encouraging evaporation by excessive air flow.

2. Improved lids for pans (also helps with 1).

3. Separation of VOC producing processes from dust producing processes to improve ventilation efficiency.

4. Connection of heat producing processes to chilled water cooling system to reduce emissions.

5. Purchase of F.I.D. equipment (or similar) and air velocity meter to monitor mass of solvent emitted.

(NOTE - it is relevant here to point out the difficulty of making quantitative assessments that are comparable with those done at a previous time when the ducting systems are necessarily in a continuing state of change.)

6. Discussions with bulk solvent suppliers will lead to the use of methods of reducing VOC emissions during solvent deliveries.

Additional notes

The categorisation of product/process permutations into the four types described above will be done in two stages. An initial stage, taking approximately one year, will involve looking at products in easily identifiable groups (eg cellulose) and attempting to replace those that cause a problem. The second stage will then involve categorising the modified range. At the present rate of change of the product range, attempting the second stage before 1996 would produce data of limited future use.

Dust extraction - the dust arrestment system is designed to exhaust cleaned air to atmosphere in the summer and to return it to the factory in the winter.

The contents of clauses 24 and 25 of PG 6/10 have been noted and systems to be designed to monitor emissions will meet the requirements described. Since it is recognised that existing ducting systems will have to be completely re-built and because the design work is still at an early stage, it is not yet possible to define a monitoring system in detail.

Methods of cleaning currently used are due to be assessed over the next year. Various options are available, but due to the vast number of permutations of product/equipment to be cleaned, no one method is likely to solve all the problems. Cleaning of equipment has always been considered as a part of the process rather than a separate procedure to be done later. This may need to be changed in some cases.

HEALTH AND SAFETY INFORMATION FOR A PRODUCT IN ADDITION TO GENERAL SHEET

ASTLEYS reference :- 18046 QD BLACK EGGSHELL AD DATE :- 10JUN92

The following information should be on the label :-
Classification :- FLAMMABLE HARMFUL UN NO :- 1263
Risk phrases :-
- HARMFUL BY INHALATION AND IN CONTACT WITH THE SKIN
- IRRITATING TO SKIN
Safety phrases :-
- DO NOT BREATHE SPRAY/VAPOUR
- AVOID CONTACT WITH EYES
- IN CASE OF INSUFFICIENT VENTILATION, WEAR SUITABLE RESPIRATORY EQUIPMENT
- AVOID EXPOSURE - OBTAIN SPECIAL INSTRUCTIONS BEFORE USE
Contains :- XYLENE ZINC CHROMATE

Occupational exposure limits (OEL) have been established by the Health and Safety Commission for the following substances contained in this product. Refer to HSE Guidance Note EH40 for further information.

SUBSTANCE & % by WT in PRODUCT		8 hr TWA	10 min TWA	
XYLENE	50-100	100 ppm (S)	150 ppm (S)	SK
LEAD (as Pb)	.05	0.15 mg (M)		SK

8 hour Time Weighted Average - long term exposure limit
10 min Time Weighted Average - short term exposure limit
ppm - parts per million. mg - mg per cubic metre
S - Occupational Exposure Standard. M - Maximum Exposure Limit
SK - There is a risk of absorption through unbroken skin.

* The flash point of the product is in the range 22-32 C.

ADDITIONAL INFORMATION ON HEALTH HAZARDS RELATED TO SUBSTANCES
XYLENE
Vapour harmful by inhalation and in the eye. Liquid harmful by contact with skin and eyes.
ADDITIONAL INFORMATION ON EFFECTS OF OVER EXPOSURE RELATED TO SUBSTANCES
XYLENE
Vapour is irritating to eyes and respiratory system. Can produce drowsiness and unconsciousness. Liquid is irritant to the eyes and if left untreated can cause damage. Repeated skin contact can cause dermatitis due to de-fatting action.

Area Director: P WARD

HSE
Health & Safety Executive

Environmental Services Department
City of Coventry CC
Broadgate House
Broadgate
COVENTRY
West Midlands CV1 1NH

Your Ref: CI/IP/MPB

Our Ref: EPA/02/390/92

- 7 AUG 1992

FAO - Mr M Brock (Snr Environmental Health Officer)

Dear Sirs

ENVIRONMENTAL PROTECTION ACT 1990 PART I: AUTHORISATION FOR PAINT AND ASSOCIATED MANUFACTURING PROCESSES

Thank you for consulting the Health and Safety Executive about the above application for the manufacture of paints and other coating materials at Far Gosford Street, Coventry, CV1 5DJ submitted by John Astley and Sons Ltd. Details of the application are noted for our records.

This process involves the use of, or may give rise to, substances subject to the Control of Substances Hazardous to Health Regulations 1988 (COSHH) and also possibly the Control of Lead at Work Regulations 1980. Occupational exposure limits for a range of substances have been assigned under COSHH. Details of these standards are given in 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 this application provides insufficient detail to enable identification of any significant elements of conflict or ambiguity with health and safety at work issues. However, if you consideration of the application suggests that 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

[redacted]

C R EATON
HM Principal Inspector of Factories

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

Astleys

JOHN ASTLEY & SONS LTD

ESTABLISHED IN 1730

Environmental Services Department,
Broadgate House,
Broadgate,
Coventry,
CV1 1NH.

3rd September 1992

Our Ref:RJA/JME
Your Ref:M Brock

For the attention of Mr M Brock

Dear Sir,

Further to your letter dated 28th July 1992, please find enclosed a copy of the advertisement as requested.

Yours sincerely,

[redacted]

pp R J Astley
Managing Director.

Directors Michael Astley Roger Astley Jeannette Astley Jonathan Astley David Astley Secretary Madge Adams
24hr Answering Service VAT No 272 3323 78 Eng Reg No 35885

GOSFORD STREET COVENTRY CV1 5DJ
TEL 0203 220771 FAX 0203 525608

Coventry LINK
INCORPORATING COVENTRY WEEKLY NEWS
VFD ACCREDITED 102,026 JULY-DEC '91. DISTRIBUTED TO COVENTRY AND SURROUNDING AREAS No. 561 Thursday/Friday, August 14th, 1992

SERVICES

PUBLIC NOTICES

ENVIRONMENTAL PROTECTION ACT 1990 - PART 1

Notification of Application under Section 6

John Astley and Sons Limited has applied for authorisation from Coventry City Council to operate the process of industrial paint manufacture at Far Gosford Street, Coventry.

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 representations about this application may be sent to the above address within 28 days of publication.

This notice was published on 14th August 1992.