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Coventry City Council

Environmental Protection Act 1990, Sections 12 (1)


Notice of Revocation

To: Mr David Machin
LFE Material Handling
Units 3, 4 & 5 Hibberd House
Curriers Close
Canley
Coventry

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 authorization reference 160 for the process of coating steelwork at LFE Material Handling Ltd, Unit 8, Curriers Close, Canley, Coventry is hereby revoked from the 6th of January 2004.

Signed on behalf of Coventry City Council

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Head of Environmental Health

Date..... 6 January 2004

LFE Material Handling Ltd



Unit 8, Curriers Close ♦ Canley ♦ Coventry ♦ CV4 8AW
Phone 024 7647 0170 ♦ Fax 024 7669 4521
email: lfmh@btconnect.com

City Development Directorate
Environmental Health
Environmental Protection
Broadgate House
Broadgate
Coventry
CV1 1NH

27th March 02

FAO Matthew Pegg

Dear Sir

Environmental Protection Act 1990, Part 1
Application to operate a coating process at Unit 8, Curriers Close, Canley, Coventry

As mentioned in our previous letter the new stack with cowl is 900m/m diameter x 3 metres high to take fumes and particulate to a better height. Enclosed is a copy of the building plans showing internal layouts of the spray booth and a new purpose built print storage facility. It also shows where the drums of waste from the spray booth are kept.

Also enclosed is some examples of paint. Thinners and gunwash data sheets showing their solvent content.

The sanding of the pallets prior to painting is carried out in an area adjacent to the spray booth, using sanding discs of varying grit, dependant on the pallets being sanded.

The spray booth shown on the plans is enclosed with a door at each end. The end can be opened before spraying for the pallets to be brought in with the forklift truck. Fitters for the booth are in corrugated paper type (3 per box) changed on a regular basis. There is no particular start-up / shutdown procedures associated with the booth.

General cleaning operations used within the process is obviously the cleaning of the booth and storage of liquid waste and powdered waste. It is then taken away by either Park Environmental or Haz Environmental on a 3 monthly basis.

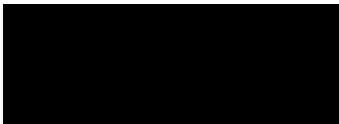
Other general cleaning operations would be degreasing the pallets with gunwash and sweeping the floor on a regular basis.

The Ransburgh gun is cleaned using gunwash in the booth as and when required, we do not have a gunwash machine.

On the premises we have three wheelie bins only used for cardboard, empty wire reels etc and normal industrial waste. These bins are emptied by Hales containers every Friday morning.

I hope the above information and the items enclosed, together with our original application is sufficient to process our application for authorisation. Please also find enclosed a cheque for £1280.00 in respect of our application fee.

Yours sincerely



D H Machin
Managing Director

DESCRIPTION OF THE PRESCRIBED PROCESS

1. Electrostatic enamel air drying paint, thinners and gunwash. (Raw materials used).
2. Paint tins, thinners and gunwash are kept in a purpose built, ventilated storage facility within the confines of the building as directed by the Heath & Safety Executive Department. The paint is handled by the Sprayer in the sealed 25-litre drum with gloves prior to spraying.

Protective equipment is worn at all times prior to and during the application of paint.

The gunwash and thinners are kept in a special barrel during use for cleaning down the pallets, with a special pump on the top so contact with the atmosphere is kept down to a minimum, as directed by the Health & Safety Executive department.
3. The paint, thinners and gunwash are removed from the suppliers lorry on pallets which are cling filmed and taken immediately down by forklift truck to the paint storage facility where the raw materials are checked, recorded and put away in the facility until they are required for use.
4. The spraying of the pallets is carried out in a purpose built spray booth using a Ransburg paint gun with cascade unit. Full protective equipment is worn at all times including overalls, respirator and boots.
5. Within the spraying facility is a fan extraction system with wall to wall filter system which is changed on a regular basis.
6. The fan extraction system mounted on the side walls of the booth carries the fumes up and out of the vent on the roof. Just recently an extended purpose built cowl has been installed on the roof to help with the extraction, as recommended by Joy Adams (Environmental Health Officer).
7. Any liquid waste and powdered waste from the spray booth is stored in drums and taken away by either Park Environmental or Haz Environmental and a certificate is issued.
8. Process malfunctions are dealt with by either in house maintenance or by Anglair engineers called in if we cannot solve the problem.



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

1. **Either** Name and address of applicant*

..... LFE MATERIAL HANDLING LTD
..... UNIT 8, CURRIERS CLOSE
..... CANLEY, COVENTRY CV4 8AW

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

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* the person/company who will operate the process, not for example 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
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.....

3. Address for correspondence if different from 1.

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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.

..... MAP ATTACHED
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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.

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

DESCRIPTION OF THE PRESCRIBED PROCESS

MAP

COVERING LETTER

CHEQUE

(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.

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 of any such release and the use of techniques for prevent or control 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 they will be able to comply with the condition implied by Section 7(4) of the Act.

The applicant may also supply any other information they wish the Local Authority to take into account in considering the application.

Fee enclosed (Cheque to be made payable to Coventry City Council)

Please contact Environmental Protection on 831834 to be advised of the current application fee

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

Signature  Date 4.3.02

Status of Signatory above MANAGING DIRECTOR

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: 160
Application Received: April 2002**

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

**LFE Material Handling Ltd
Unit 8, Curriers Close
Canley
COVENTRY
CV4 8AW**

Register in England No: 4110445

For the paint spraying of structural steelwork as described on page 2 at:

**LFE Material Handling Ltd
Unit 8, Curriers Close
Canley
COVENTRY
CV4 8AW**

Subject to the conditions specified on the attached pages, Nos 2 to 6, and within the process building as indicated on Plan No. 1.

Signed 
City Environment Officer

Dated ...29... day of ...1...2002..

1. DESCRIPTION OF PROCESS

- 1.1 This authorization is for the coating of metal, as described in the Environmental Protection (Prescribed Processes and Substances) Regulations 1991, SI472, Section 6.5 Part B paragraph (a) within the process building shown on the attached plan 01 dated December 1992 and specifically relates to the processes outlined below.
- 1.2 The delivery and storage of paints, diluents and cleaning solvents in the paint store as shown in plan numbered 1.
- 1.3 The spraying of steel structures using the Ransburgh spray gun with wet electrostatic air drying enamel paint.
- 1.4 Any change to the above descriptions 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 emissions of particulate matter noticeable beyond the process boundary.
- 2.3 All coatings, diluents and cleaning solvents used in the process shall comply with the solvent specifications outlined in clause 20 of Secretary of State's Guidance Note PG6/23(97). 'The coating of metal and plastic' (compliance date 1st April 2007 if less than 15 tonnes of solvent is being used in any 12 month period).
- 2.4 The following emissions to atmosphere shall not be exceeded except in accordance with clauses 13 and 14 of Secretary of State's Guidance Note PG6/23(97).
 - a) Total particulate matter from the stack serving the spraybooth on plan numbered 01 shall not exceed 50mg/m³
(Compliance date 1st April 2007 if less than 15 tonnes of solvent is being used in any 12 month period)
- 2.5 The introduction of dilution air to achieve the emission concentration limits in this authorization is not permitted. Exhaust flow rates should be consistent with the efficient capture of emissions.

- 3. MONITORING SAMPLING AND MEASUREMENT OF EMISSIONS**
- 3.1 A visual assessment of particulate emissions from the process shall be carried out once a day whilst paint spraying is in progress, from the process boundary of the site where accessible.
- 3.2 An olfactory assessment of volatile organic compound emissions from the process shall be carried out once per day whilst paint spraying is in progress, from the process boundary of the site where accessible.
- 3.3 To demonstrate compliance with clause 2.4 (a) particulate emissions from the stack serving the spray booth on plan numbered 01 shall be tested once every 12 months (compliance date 1st April 2007 if less than 15 tonnes of solvent is being used in any 12 month period).
- 3.4 Monitoring to demonstrate compliance with clause 2.4 shall not take place without prior approval from the local authority (compliance date 1st April 2007 if less than 15 tonnes of solvent is being used in any 12 month period).
- 3.5 At least 14 days prior to monitoring taking place to demonstrate compliance with clause 2.4 (a) the operator shall notify the local authority of the provisional date and time of monitoring, the pollutants to be tested for and the methods to be used (compliance date 1st April 2007 if less than 15 tonnes of solvent is being used in any 12 month period).
- 3.6 If the monitoring required by clause 3.4 indicates that the emission concentration from stacks serving the spraybooth on plan numbered 01 is twice the emission limit specified in clause 2.4 (a) the operator shall notify the local authority immediately (compliance date 1st April 2007 if less than 15 tonnes of solvent is being used in any 12 month period).
- 3.7 If the monitoring required by clause 3.3. indicates that the emission concentration from the stack serving the spraybooth exceeds the emission limit specified in clause 2.4 the operator shall notify the local authority within 7 working days of the date of monitoring took place (compliance date 1st April 2007 if less than 15 tonnes of solvent is being used in any 12 month period).
- 3.8 The results of monitoring required by clause 3.3 shall be submitted to the local authority in writing within 8 weeks of the date the monitoring took place (compliance date 1st April 2007 if less than 15 tonnes of solvent is being used in any 12 month period).
- 3.9 The results of the monitoring required by clauses 3.1 and 3.2 shall be recorded in a log book and the detail the date and time monitoring took place, the location and observer, an estimation of wind strength and direction and an

assessment of the emissions. This log book shall be retained on site for a minimum of 2 years.

3.10 Any adverse results from the monitoring required by clauses 3.1 and 3.2 shall be investigated immediately and the appropriate remedial action undertaken immediately. The cause of the adverse emission and the remedial action taken shall be recorded in detail in the process log book and be retained on site for a minimum of 2 years.

3.11 A detailed record shall be kept of all organic solvents used in the process to include coatings, diluents and cleaning solvents. This record shall be submitted to the local authority once every 12 months and shall include the following information:-

(a) the name of the product and its classification in accordance with clause 20 of Secretary of State's Guidance Note PG6/23(97)

(b) the total amount of solvent in each product used in grams of solvent per litre of product

(c) the total amount of each product used in the previous 12 months

(d) the total amount of solvent used in the previous 12 month period in tonnes, discounting solvents despatched for recycling or reuse.

4. MATERIALS HANDLING

4.1 The cleaning of spray guns with organic solvent shall only take place within the spraybooth and shall only take place when the extraction system is in operation and in proper working order and filters be in place. The used solvent shall be sprayed into a separate receptacle that shall be emptied as necessary.

4.2 The spraying of coatings shall only take place within the spraybooth and only take place when the extraction system is in operation and in proper working order.

4.3 All full and partially full containers holding organic solvent or organic solvent based products shall be stored in the paint stores marked on plan numbered 01.

4.4 Paint mixing shall only take place within the paint stores marked on plan numbered 01.

4.5 The extraction system serving stack to the spraybooth marked on plans numbered 01 shall be serviced once every 12 months to ensure proper working order and any faults rectified immediately. The service records and records of repairs made shall be kept on site for a minimum of 2 years.

4.6 The corrugated paper type filters shall be visually inspected on a two weekly basis and be replaced as necessary.

5. CHIMNEYS, VENTS AND PROCESS EXHAUSTS

5.1 Emissions from the spraying of coatings shall only be emitted to atmosphere via the stack serving the spraybooth marked on plan numbered 1.

5.2 The stack serving the spraybooth shall be at least 3m above roof ridge level and have an efflux velocity of 15m/s at the final discharge point of the stack when the extraction system is in operation.

5.3 The stack serving the spraybooth shall not be fitted with caps, cowls or any other restrictive devices except by prior written approval from the local authority.

6. GENERAL OPERATIONS

6.1 Any mechanical malfunction or spillage of material shall be attended to and remedied as soon as possible. Any spillages of organic solvents must be cleared up using absorbent material to held on site. Soiled materials shall be stored in sealed containers before removal. 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 neighbouring residents shall be reported immediately to this Authority.

6.3 A copy of this authorization 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 authorization.

SUPPLEMENTARY NOTES

These notes are not part of the authorization.

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 Department, Tel: 831834 during office hours, 832222 outside office hours.