

PERMIT REFERENCE: PPC 037

London Taxis International Ltd

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

Process Address	Holyhead Road Coventry
Process Type	Respraying of road vehicles
Current Operator	LTI Limited Holyhead Road Coventry CV5 8JJ
Previous Operator	n/a
Date of Application	1 st April 2004
Date Permit Issued	21 st January 2005

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

DOCUMENT A : PERMIT

LTI Limited

Reference Number **PPC/037**

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:

LTI Limited


Whose registered office is:

**LTI Limited
Holyhead Road
Coventry
CV5 8JJ**

to operate a Part B installation involving a coating activity, as prescribed in Section 6.4 Part B of Schedule 1 to The Regulations, at:

**LTI Limited
Holy Head Road
Coventry
CV5 8JJ**

The permit is subject to the conditions specified in this document consisting of 12 pages and comprising documents A, B and C, plans PPC/037/A, PPC/037/B and Appendix 1.


Alan Bennett, Head of Environmental Health
A person authorised to sign on behalf of the Council

Dated21 January 2004.....

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 PG 6/34(04)) – Respraying of Road Vehicles
- 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: Ayeisha Mann

Permit Checked By: Rachel King

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 permitted installation is shown on the attached plan PPC/037/A. The Installation boundary is marked in red on the attached plan PPC/ 037/A. The internal layout of the paint shop is shown on the attached plan PPC/ 037/B.

Description of Installation

- Delivery and storage of paints, diluents and cleaning solvents in the paint store.
- The sanding of vehicles in the scuffing booth.
- The preparation of vehicles for spraying including preheating using infrared panels in the tack off area employing gas fired burners.

- The spraying and air-drying of vehicles in the base booth and lacquer spray booths. The curing of painted vehicles in the stoving oven follows this.
- The repair of minor damage in the rectification combi-booth involving vehicle preparation, spraying and oven curing

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	Tag booth, base booth, lacquer booth	Particulates VOC's	1.1 to 1.3 inclusive and 1.5	Waterwash filtration system
2	Paint rectification combi-booth	Particulates VOC's	1.1 to 1.3 inclusive and 1.5	Dry filters
3	Curing oven	VOC's	1.1 and 1.4	None

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 site 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 Emissions from the gas fired burners serving the booths and ovens shall be free from visible smoke during normal operation and in any case shall not exceed the equivalent of Ringlemann shade 1, as described in British Standard BS2742:1968.
- 1.4 All paints, diluents and cleaning solvents used in the process shall comply with the organic solvent limits set out in Table 5 of Secretary of States Guidance for Respraying of Road Vehicles, Process Guidance Note 6/34(04).
- 1.5 The following emission concentration limits shall not be exceeded.
 - a) Total particulate matter from the stacks serving the:
 - i) Tag booth, base booth, lacquer booth and rectification booth shown on plan PPC/037/B 10mg/m³
- 1.6 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.
- 1.7 All coatings shall be applied using high volume low-pressure spray guns except by the prior written approval of other application methods by the Local Authority.
- 1.8 The tag, base, lacquer and rectification booths shown on plan PPC/037/B shall be fitted with a pressure gauge, and an audible or visual alarm to warn of over pressure. In the event of over pressure the alarms shall be activated and the booth extraction system shall automatically cease. The application of coatings shall cease and not continue until the cause of the fault has been identified and remedied. The fault and remedial action shall be recorded in a process logbook, which shall be retained on site for a minimum of two years.
- 1.9 The circulation and level of the liquor in the wet filtration system serving the tag, base, and lacquer booths shall be continually monitored. In the event of pump failure or a drop in liquor level an audible alarm shall be activated and the spraying of coatings shall cease and not recommence until the cause of the failure of the filtration system has been identified and remedied as necessary. The fault and remedial action shall be recorded in a process log book, which shall be retained on site for a minimum of two years.

2.0 MONITORING, SAMPLING AND MEASUREMENT OF EMISSIONS

- 2.1 Monitoring to demonstrate compliance with clause 1.5 shall take place every 12 months.
- 2.2 At least 14 days prior to the monitoring required by clause 2.1 the operator shall notify the local authority of the provisional date and time of monitoring and the proposed methods to be used.
- 2.3 The results of the monitoring required by clause 2.1 shall be forwarded to the local authority within 8 weeks of the sampling taking place.
- 2.4 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 this Local Authority once every 12 months and shall include the following information:
- a) The name of each product used
 - b) The total amount of solvent used in each product in grams of solvent per litre of product.
 - c) The proportion or ratio of individual products in the ready to use mixed products, for example 2 pack coating.
 - d) The total amount of solvent used in previous 12-month period.
 - e) The total amount of solvent used in the previous 12-month period in tonnes, discounting solvents dispatched for recycling or re-use.

3.0 OPERATIONAL CONTROLS

- 3.1 The cleaning of spray guns and other equipment with organic solvents shall only be carried out within the fully enclosed gun wash machines in the paint kitchen shown on plan PPC/037/B.
- 3.2 The flushing out of spray guns in the tag, base and lacquer booths shall only be undertaken through enclosed pipe work within the booth and the used solvent sprayed into a separate receptacle that shall be emptied as necessary.
- 3.3 The mixing of paint shall only be undertaken in the paint kitchen whilst the extraction system is in operation.
- 3.4 The application of coatings shall only take place within the booths shown on plan PPC/037/B when in proper working order.
- 3.5 Containers which have held materials which contain organic solvent-based materials shall be kept lidded whilst not in active use.

4.0 STACKS, DUCTS AND PROCESS VENTS

- 4.1 Emissions from spraying of coatings in the tag, base and lacquer booths shall only be emitted to atmosphere via the water wash filtration system.
- 4.2 The height of the stacks serving the tag, base and lacquer booths and the curing oven shall be 3 metres above the roof ridge. The linear velocity within the stack shall not exceed 9m/s.
- 4.3 Emissions from the rectification booth shall only be emitted to atmosphere via dry filtration system.

- 4.4 The height of the stack serving the rectification booth shall be 3metres above the roof ridge. The efflux velocity shall not be less than 15m/s.
- 4.5 Emissions from the curing of coatings in the oven shall only be emitted to air via the proper installation stack.
- 4.6 The height of the stack serving the oven shall be 3m above the roof ridge. The efflux velocity shall not be less than 15m/s.
- 4.7 Emissions from the spraying of coatings in rectification booth shall only be emitted to atmosphere via the dry filtration system. The height of the stack serving this booth shall be 3m above roof ridge level.
- 4.8 The particulate matter generated by the use of sanding devices rather than manual sanding in the scuffing booth by shall not be extracted to atmosphere but extracted directly into the dust collection system. The full collection bags shall be replaced as necessary with used bags containing particulate matter being sealed before disposal, or stored in a lidded container/skip.

5.0 GENERAL OPERATIONS

- 5.1 The operator shall undertake regular cleaning and preventative maintenance including inspection and repair/replacement on all plant and equipment concerned with the emission, capture, transport and control of emissions to atmosphere. Where necessary manufacturers guidelines shall be used to determine the regularity of maintenance. Records of preventative maintenance including inspections and any works undertaken shall be kept on site and made available to the local authority inspector on request.
- 5.2 Spares and consumables for plant and equipment used in the installation in particular that subject to continual use or wear shall be held on site or shall be available at short notice. Such plant or equipment shall not be used unless that plant or equipment is capable of working in accordance with the conditions of this permit.
- 5.3 Staff at all levels shall receive the necessary training and instruction in their duties relating to control of the activities and emissions to air. Records shall be kept which details all relevant training provided to staff, and these records shall be kept for a minimum of 2 years.
- 5.4 Any malfunction of plant or spillage of solvent-based materials shall be remedied as soon as possible and process operations altered whilst the necessary work is undertaken.
- 5.5 Any incident likely to give rise to adverse atmospheric emissions or emissions that may have an impact on the local community shall be notified to the local authority immediately, and the details of incident including remedial action taken recorded in the process log book.
- 5.6 The operator shall make available on demand and without charge any of the records required to be kept by this permit.
- 5.7 If there is any intention to change any aspect of the prescribed installation from the description contained in the beginning of this permit, or any other aspect which may affect the substances or concentration or amount of substances being emitted to atmosphere, the operator shall notify the regulator of the proposed changes at least 4 weeks in advance before the changes take place.

6.0 COMPLIANCE WITH SOVENT 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 Compliance for general VOC emissions shall be demonstrated by one of the following methods
1. The use of a solvent reduction scheme to demonstrate the achievement of a target emission. The emission targets are as follows:

Target emission all existing installations by 31/10/05 All new installations until 31/10/04	Target emissions all existing installations from 31/10/07 And target emission all new installations from 31/10/04
Total mass of solids x1.8	Total mass of solids x1.2
To be met using compliant coatings and controlled and monitored use of gunwash and thinners	

Or

2. By meeting emission and fugitive limits by 31 October 2007 as follows: -

Emission limits /provision	Type of monitoring
50mg/Nm ³ as 2 minute mean for spraying operations 15 minute mean for baking operation	Annual manual extractive testing

The above emission limit values do not apply where compliant coatings are used. Compliant coatings are listed within Table 5 of Secretary of States Guidance for Respraying of Road Vehicles, Process Guidance Note 6/34(04).

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/ 037 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 the installation or mobile plant significantly without imposing excessive costs; or
- c) Operational safety of the activities carried out in the installation or mobile plant requires other techniques to be used

Health and Safety

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

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

Other Statutory Requirements

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

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

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

Transfer of Permits

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

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

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

Variation to Permits

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

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

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

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

Substantial Change

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

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

Noise

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

Appeals

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

within 2 months of the date of issue of the notice. Appeals should be despatched on the day they are dated and sent to:

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

HMSO Publications

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

Emission Monitoring Protocol

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

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

The main components of a Protocol are as follows:-

1. Calibre and quality of the sampling team.
2. A reference measurement method (standard methods may not always be available)
3. A standard methodology setting out:
 - health and safety considerations
 - pollutants of interest
 - plant operating conditions required
 - selection and location of sampling position
 - sampling characteristics (e.g. isokinetic etc) and techniques
 - sampling frequency
 - sampling duration
 - number of samples
 - type (including make and model), condition and suitability of sampling equipment
 - required accuracy
 - variability of emissions
 - analytical methods including laboratory competence and NAMAS accreditation certificate copy for each pollutant of interest
 - analytical precision
 - procedures to be adopted if standard methods unavailable
 - calibration certificate(s) for sampling equipment
 - Quality Control and Quality Assurance procedures
 - Presentation of results and associated information.

Plan PPC/037/A Premises Boundary of LTI Limited



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