POLLUTION PREVENTION AND CONTROL ACT 1999

ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2007

DOCUMENT A : PERMIT

Peugeot Motor Company

Reference Number: **PPC/183**

Coventry City Council (“the Council”) in accordance with Section 13(1) of the Environmental Permitting (England & Wales) Regulations 2007 ("The Regulations") hereby permits:

Peugeot Motor Company

Whose registered office is:

Pinley House
2 Sunbeam Way
Coventry
CV3 1ND

To operate a Part B installation involving a coating activity, as prescribed in Section 6.4 Part B (b) of Schedule 1 Part 2 to The Regulations, at:

Peugeot Training and Technical Centre
280 Humber Road
Coventry
CV3 1BH

The permit is subject to the conditions specified in this document consisting of 15 pages and comprising documents A, B and C, plans PPC/183/A and PPC/183/B and Appendix 1.

Signed: .....

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

Dated: ……

SCOPE

The installation comprises not just any relevant unit carrying out a Part B activity listed in Schedule 1 Part 2 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 6/34b (06) – Respraying of Road Vehicles
- Secretary of State's Guidance – Environmental Permitting General Guidance Manual on Policy and Procedures for A2 and B installations.

Date Annual Fee Required:	1st April of each financial year
Date For Full Compliance:	Date permit issued
Permit Prepared By:	Neil Chaplin
Permit Checked By:	Nigel March

LEGISLATION

1. Pollution Prevention and Control Act 1999.
2. Environmental Permitting (England and Wales) Regulations 2007

BRIEF DESCRIPTION OF THE INSTALLATION REGULATED BY THIS ENVIRONMENTAL 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 Part 2 of the 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 Part 2 to the Regulations, but also directly associated activities which have a technical connection with a Schedule 1 Part 2 activity and which could have an effect on pollution.
- An **Operator** is the person (e.g. 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 process is shown on the attached plan PPC/183/A, in addition to the Installation boundary that is marked in red. The internal layout is shown on the attached plan PPC/ 183/B

Description of Installation

- The delivery and storage of paints, diluents and cleaning solvents used for the preparation and spraying of motor vehicles.
- The dry sanding of body panels using orbital sanding systems and a local contained filtered extraction system.
- Application of wax under seal and panel sealants by brush, spray or injection methods.
- The mixing of paints within the paint mixing room.
- The spray painting of car body panels and subsequent low temperature bake curing of vehicles in a 2 booths, employing high velocity low pressure spray guns for painting.

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	Dalby Genesis Hi Air Series Spray Booth	VOC Particulate	1.5, 2.1	Dry filters
2	Dalby Gensis Hi Air Series Spray Booth	VOC Particulate	1.5, 2.1	Dry filters
3	Dalby Genesis Hi Air Series Spray Booth	VOC Particulate	1.5, 2.1	Dry filters
4	Nederman E-Pak dust extraction system (sanding)	Particulate	3.14	Bag collection (not emitted to atmosphere)

DOCUMENT B

CONDITIONS

All conditions 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.

1.2 All emissions to air should be free from persistent visible emissions and droplets.

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

1.4 Emissions from combustion processes shall in normal operation be free from visible smoke and in any case shall not exceed the equivalent of Ringelmann Shade 1 as described in British Standard BS 2742: 1969.

1.5 The concentration of total particulate matter in the final discharge from the spray booths shall not exceed 10mg/m^3.

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

1.7 All paints, diluents and cleaning solvents used in the process shall comply with the organic solvent specification as detailed in Table 4 of the Secretary of State's Guidance Note 6/34b (06).

1.8 The best available techniques (BAT) shall be used to prevent or where that is not practicable, reduce emissions from the installation in relation to any aspect of the operation of the installation which is not regulated by any other condition of this permit. A full definition of BAT and this duty is given in Document C of this permit.

2.0 MONITORING, SAMPLING AND MEASUREMENT OF EMISSIONS

2.1 To demonstrate compliance with clause 1.5, the operator shall either:

a) Provide manufacturers certificates of guarantees and test data to demonstrate that the spray booths meet the required emission concentration limit

Or

b) In the absence of such guarantees and test data, carry out periodic emissions monitoring from the spray booths on a yearly basis according to the main procedural requirements of BS EN 13284

2.2 At least 7 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 To demonstrate compliance with Conditions 1.1 – 1.4 monitoring shall be undertaken at least once per week whilst paint spraying is in progress. The results of this monitoring shall be recorded in a logbook and will include the time, date and wind direction of when the assessment was made. Any adverse results, together with corrective action taken shall also be recorded. This logbook shall be retained on site for a minimum of 2 years.

3.0 OPERATIONAL CONTROLS

3.1 The spray booths shall only be operated when the pressure gauge, audible alarm and extract shutdown system are in good working order.

3.2 The alarms fitted to the booths shall be tested at least once a month and any defects rectified before the booth is used again. The results of this testing shall be noted in a logbook showing the date and time of the test along with the details of any corrective action required.

3.3 The three Dalby spray booths shall undergo maintenance and servicing inspections in accordance with the recommendations of the manufacturer. The service inspection shall include the testing of the pressure gauge; audible alarm and booth extract shutdown systems installed on the ovens. Any faults noted shall be remedied as soon as possible and the booth shall not be used until the necessary remedial action has been completed. Service records shall be kept and details the booths serviced, the parts inspected, any faults noted and repairs undertaken. These records shall be kept on site for a minimum of 2 years.

3.4 The application equipment for all coatings shall be capable of achieving a transfer efficiency of solids of at least 65%.

3.5 The cleaning of spray guns and other equipment shall only be carried out in the fully enclosed gun wash machine.

3.6 The spraying of paint shall only be carried out in the spray booths and whilst the extraction system is in operation and in proper working order.

3.7 The testing of any spray guns and other equipment shall only be carried out in the spray booths. This shall only be undertaken whilst the extraction system is in operation and in proper working order.

3.8 The mixing of paint shall only take place in the area marked paint mixing room on plan PPC/183/B. This shall only take place whilst the extraction is in operation.

3.9 All full and partially full tins and drums that hold or have held materials containing organic solvents shall be lidded whilst not in use and must be stored in the paint mixing area.

3.10 Waste solvents and other liquid wastes containing VOC's shall be despatched off site for recycling. Copies of waste transfer notes must be retained on site for a minimum of 2 years.

3.11 Where cleaning solvents are manually dispensed onto cleaning wipes the solvents should be held and dispensed by a piston type dispenser or similar contained device. Pre impregnated wipes should be held within an enclosed container prior to use.

3.12 Solvent contaminated wipes and other wastes shall be handled in accordance with a written procedure, a copy of which shall be made available to the regulator upon request. They must be stored in suitable sealed containers fitted with a self-closing lid, and clearly labelled so that all persons that handle them are aware of their contents.

Note: From a health and safety perspective it is advised that such bins are emptied at least daily, are situated away from heat sources and sited to allow good air circulation for cooling.

3.13 Organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas. Any waste arising from such remedial action shall be treated as per Condition 3.12.

3.14 The dry sanding of vehicles using powered equipment shall only be carried out when the Nederman E Pak dust extraction unit is in operation. Particulate emissions from the sanding of vehicles shall be extracted at source by the dust extraction unit and collected into the filter bag dust collection system. Filter bags shall be changed as required and securely bagged or stored in enclosed containers whilst awaiting disposal.

3.15 Dry or dusty material from dust abatement activities must be securely bagged and sealed prior to removal from site. The dry sweeping of dust and dusty waste shall not be undertaken and such waste shall be removed by vacuum cleaning or damped down prior to sweeping.

3.16 A high standard of housekeeping shall be maintained in all operational areas at all times.

4.0 STACKS, DUCTS AND PROCESS VENTS

4.1 Emissions from the spraying or curing of coatings in the spray booths shall only be emitted to atmosphere via dry fibre filtration system.

4.2 The stacks serving the spray booths shall be at least 3 metres above the roof ridge level and shall achieve an efflux velocity of 15m/s, without restriction by a cap, cowl or other device.

4.3 Stacks and ductwork should be cleaned regularly to prevent accumulation of materials that may impair the exit velocity of the emissions.

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 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.

5.4 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.

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

5.6 If the operator proposes to make a change in operation of the installation the operator must notify the regulator in writing at least 14 days before making the change. The notification must contain a description of the proposed change. It is not necessary to make such a notification if an application to vary this permit has been made and the application contains a description of the proposed change.

Note: In this condition 'change in operation' means a change in the nature of functioning, or an extension of the installation that may have consequences for the environment.

5.7 The operator shall maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment. These documents shall be made available to the regulator on request.

The training of all staff with responsibility for operating the activity shall include:

- Awareness of their responsibilities under the Permit; in particular how to deal with conditions likely to give rise to emissions, such as in the event of spillage;
- Minimising emissions on start up and shut down; and
- Action to minimise emissions during abnormal conditions.

5.8 The operator shall put in place some form of structured environmental management system (EMS), whether by adopting published standards (ISO 14001 or the EU Eco Management and Audit Scheme [EMAS]) or by setting up an EMS tailored to the nature and size of the particular process.

6.0 COMPLIANT COATINGS

6.1 Surface preparation and painting operations shall be carried out using only coating materials, which are placed on the market for use in vehicle refinishing body shops (as identified by a label on the container containing

the following information -a description of the product by identification of the contents as a subcategory of Directive 2004/42/CE, the relevant VOC limit values in g/l as referred to in Annex II of Directive 2004/42/CE and the maximum content of VOC in g/l of the product in a ready to use condition ")

For information, the individual bodyshop products that are covered by this permit are listed in Appendix 4 of Process Guidance Note 6/34b (06).

6.2 The products used in coating shall be prepared and applied in accordance with the supplier's instructions. Under no circumstances shall the product be thinned with more than the supplier's stated quantity or percentage of thinner.

For information, the maximum, application-ready VOC contents for individual categories of products are listed in Appendix 5 of Process Guidance Note 6/34b (06).

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 Environmental Permitting (England & Wales) Regulations 2007 “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 that is not 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.

Further guidance can be obtained from the Secretary of State’s Guidance - Environmental Permitting General Guidance Manual on Policy and Procedures for A2 and B Installations.

SUPPLEMENTARY NOTES

These notes do not comprise part of the Permit PPC/183 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 34(1) of the Environmental Permitting (England and Wales) Regulations 2007:

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 Environmental Permitting (England and Wales) Regulations 2007. 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. The 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 Condition 5.6 of this Permit)
- 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 20(1) of the Regulations. The application must be in writing and, in accordance with Part 1 of Schedule 5 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
Environment Team, Major and Specialist Casework
Room 4/19 – Kite 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.