

Permit with introductory note

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

Installation address

**Clarks Bodyworks (Humberston) Ltd
Jackson Place
Humberston
North East Lincolnshire
DN36 4AS**

Permit Reference: EP/200200003

Contact Details:

Mr Danny Fox
Pollution Control Officer
North East Lincolnshire Council
Freeman House
Freeman Way
Grimsby
North East Lincolnshire
DN32 7AU

Tel: 01472 324787
Fax: 01472 324785

www.nelincs.gov.uk

E-mail danny.fox@nelincs.gov.uk

Introductory note

This introductory note does not form a part of the Permit

The following Permit is issued under Regulation 10 of the Pollution Prevention and Control (England and Wales) Regulations 2000 (as amended) (S.I.2000 No. 1973) ("the PPC Regulations") to operate an installation carrying out one or more of the activities listed in Part B to Schedule 1 of those Regulations, to the extent authorised by the Permit.

The permit includes conditions that have to be complied with. It shall be noted that aspects of the operation of the installation which are not regulated by those conditions are subject to the condition implied by Regulation 12(10) of the PPC Regulations, that the Operator shall use the best available techniques for preventing or, where that is not practical, reducing emissions from the installation.

Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Brief description and installation regulated by this permit

Coating Process as prescribed by Section 6.4 Part B of Schedule 1 of the Pollution Prevention and Control (England and Wales) Regulations 2000 (as amended). Clarks Bodyworks (Humberston) Ltd operates a re-spraying of road vehicles process.

Damaged vehicles are brought on to the site and stripped down to an appropriate level. Damaged panels and other body work are either repaired or replaced. This process may involve grinding and sanding of fillers which will generate particulate matter. All particulate arrestment and collection is carried out internally.

Once body repairs have been completed the vehicle is prepared for painting. Paints are mixed and applied by High Volume Low Pressure (HVLV) spray guns in spraybooth/ovens. Following paint drying the vehicle is cooled, removed from the booth and the masking is removed. It is then polished if necessary and any remaining parts are re-fitted.

Superseded Licences/Consents/Authorisations relating to this installation		
Holder	Reference Number	Application Date
Clarks Bodyworks (Humberston) Ltd, Jackson Place, Humberston North East Lincolnshire DN36 4AS	EPA/132/CM/IL/HJ	28 th August 1995

Confidentiality

The Permit requires the Operator to provide information to North East Lincolnshire Council. The Council will place the information onto the public registers in accordance with the requirements of the PPC Regulations. If the operator considers that any information provided is commercially confidential, it may apply to North East Lincolnshire Council to have such information withheld from the register as provided in the PPC Regulations. To enable North East Lincolnshire Council to determine whether the information is commercially confidential, the Operator shall clearly identify the information in question and shall specify clear and precise reasons.

Variations to the permit

This Permit may be varied in the future. If at any time the activity or any aspect of the activity regulated by the following conditions changes such that the conditions no longer reflect the activity and require alteration, the Regulator shall be contacted.

Surrender of the permit

Where an Operator intends to cease the operation of an installation (in whole or in part) the regulator shall be informed in writing, such notification must include the information specified in regulation 20(3) of the PPC regulations.

Transfer of the permit or part of the permit

Before the Permit can be wholly or partially transferred to another person, a joint application to transfer the Permit has to be made by both the existing and proposed holders, in accordance with Regulation 18 of the PPC Regulations. A transfer will be allowed unless the Authority considers that the proposed holder will not be the person who will have control over the operation of the installation or will not ensure compliance with the conditions of the transferred Permit.

Responsibility under workplace health and safety legislation

This Permit is given in relation to the requirements of the PPC regulations. It must not be taken to replace any responsibilities you may have under Workplace Health and Safety legislation.

Statutory Guidance

This permit has been based on the following statutory guidance note, published by the Department of Environment, Farming and Rural Affairs (DEFRA):-

“Respraying of Road Vehicles“

Ref. PG 6 / 34 (04)

This can be obtained from the following web page:

<http://www.defra.gov.uk/environment/airquality/lapc/pgnotes/default.htm>

Appeal against permit conditions

Anyone who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State for the Environment, Food and Rural Affairs. Appeals must be made in accordance with the requirements of Regulation 27 and Schedule 8 of the PPC regulations.

Appeals shall be received by the Secretary of State for Environment, Food and Rural Affairs. The address is as follows:

The Planning Inspectorate
Environmental Appeals Administration
Room 4/19 – Eagle Wing
Temple Quay House
2 The Square, Temple Quay
BRISTOL
BS1 6PN
Tel: 0117 372 8812
Fax: 0117 372 6093

Please Note

An appeal brought under paragraph (1) (c) or (d) in relation to the conditions in a permit will not suspend the effect of the conditions appealed against; the conditions must still be complied with.

In determining an appeal against one or more conditions, the Act allows the Secretary of State in addition to quash any of the conditions not subject to the appeal and to direct the local authority either to vary any of these other conditions.

End of introductory note

Permit issued under the Pollution Prevention and Control Regulations 2000

Permit

Permit Number
EP/200200003

North East Lincolnshire Council (the Regulator) in exercise of its powers under Regulation 10 of the Pollution Prevention and Control Regulations 2000 (S.I. 2000 No. 1973) hereby permits.

Clarks Bodyworks (Humberston) Ltd ("the operator"),

Whose registered office is


Clarks Bodyworks (Humberston) Ltd
Jackson Place
Humberston
North East Lincolnshire
DN36 4AS

To operate an installation at

Clarks Bodyworks (Humberston) Ltd
Jackson Place
Humberston
North East Lincolnshire
DN36 4AS

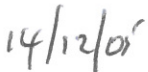
to the extent authorised by and subject to the conditions of this Permit and within the boundary identified in condition A

Signed



Tony Neul
Neighbourhood Improvement Manager
Authorised to sign on behalf of
North East Lincolnshire Council

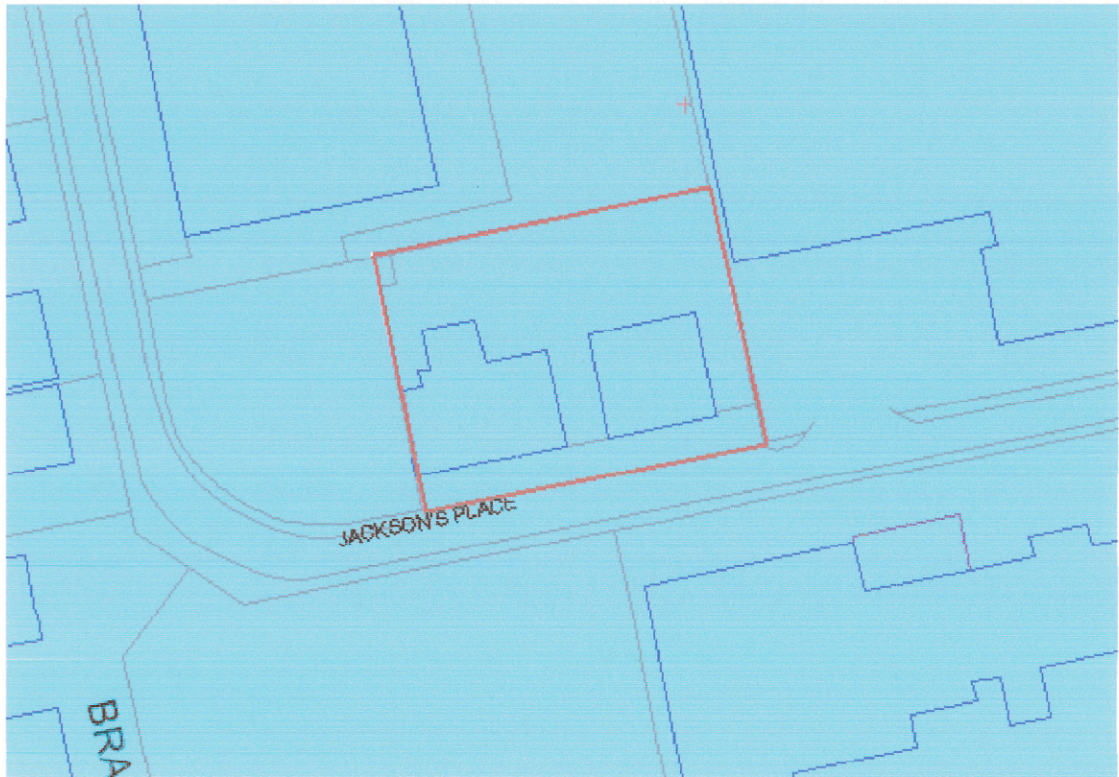
Dated



CONDITIONS

Extent and limit of the installation

- A The operator is authorised to carry out the activities and/or associated as specified and within the boundary shown in red on the plan below:-



Coating Process as prescribed by Section 6.4 Part B of Schedule I of the Pollution Prevention and Control (England and Wales) Regulations 2000 (as amended). Clarks Bodyworks (Humberston) Ltd operates a re-spraying of road vehicles process.

Damaged vehicles are brought on to the site and stripped down in the detrim/retrim shop. All irreparably damaged body panels, lights and bumpers etc. are removed. Where required the vehicle is then moved to the body shop for straightening, using body alignment jigs and pullers. Damaged panels and other body work are either repaired or replaced. This process may involve welding work which will generate particulate matter. Once body repairs have been completed the vehicle is moved to the paint preparation shop where it is prepared for painting. This may involve the use of fine stoppers and the sanding of paint work prior to painting.

All fume and dust from welding, sanding or grinding operations are extracted via the Pneumatic NTD2002 centralised dust extraction system with manual shakedown or via the welding extraction unit.

When prepared the vehicle is moved to one of two spray booths and following final preparation, primers and paint are applied using HVLP equipment.

When painting is completed paint drying or curing is achieved by reducing the air extraction rate and indirectly heating the incoming air with gas burners. The products of combustion are passed to air, through dry filters, via stacks. Most of the paints used require a baking time of approximately 20-30 minutes at 60°C. In an effort to increase efficiency and as an alternative to the oven low bake system, IRT short wave infra red units are also used. Curing time is approximately 10 minutes for most finishes.

Following paint drying the vehicle is cooled, removed from the booth and the masking removed. It is then polished if necessary and moved back into the vehicle storage and detrim/retrim shop where all the remaining parts are fitted.

Emission Limits and Controls

- 1.1 All releases to air, other than condensed water vapour, shall be free from persistent visible emissions.
- 1.2 All emissions to air shall be free from droplets.
- 1.3 The maximum content of organic solvents (in grammes per litre) which may be present in the coating as applied shall not exceed the amounts specified below.

All values are maxima, not averages, and guidance on the functions of the materials listed is given on page 38 of Guidance Note PG6/34(04).

After 1st April 1998

Gunwash	850
Precleaner	200
Wash primer (a)	780
Precoat (b)	250
Primer Surfacer	250
Non-sand surfacer	250
Primers for wet-on-wet topcoat application	250 or 540
Topcoats:	
1-coat conventional	420
2-coat base and clear (c)	420
3-coat topcoat systems (c)	420
Special products (d)	840

- 1.4 Emissions from combustion processes shall not exceed the equivalent of Ringlemann shade 1 as described in British Standard B.S.2742:1969 at any time.
- 1.5 There shall be no offensive odour emitted from the installation detected beyond the installation boundary as perceived by an officer of the regulating authority.
- 1.6 The use of odour masking agents and counteractants (other than as arrestment equipment additives permitted by a specific permit condition) is not permitted.
- 1.7 All paint spraying operations shall only be carried out in either the SPV Holland or Davair combination spray booth ovens, equipped with audible alarms in the event of positive pressure within the booth, and nowhere else within the installation.
- 1.8 All Spraybooths shall meet an emissions limit for particulate matter of 10 mg/Nm³.
- 1.9 HVLP spray guns shall be used for the application of all primers and top coats.
- 1.10 All operations which could lead to emissions of particulate matter shall be carried out with the use of the Pneumatic NTD2002 centralised dust extraction system with manual shakedown. An emission limit of 50 mg/Nm³ for particulate matter shall not be exceeded. All such operations shall be carried out within the work area marked B on the premise plan, appendix A.
- 1.11 All appropriate precautions must be taken to minimise emissions during start-up and shutdown of the process.

Monitoring, Sampling and Measurement of Emissions

- 2.1 The points of emission to atmosphere shall be observed visible emissions at least once per day, or more often as may be prescribed in writing by the regulating authority, from a point providing an unimpeded view of the emissions points for the prescribed process. In the event of visible emissions being observed, immediate action shall be taken to (determine the cause of) and resolve the malfunction responsible for the emission, and, if necessary, action shall be taken to abate the emission.

Contingency arrangements shall be instigated to prevent or reduce to a minimum any further visible emissions caused by the malfunction. The regulator shall be notified of any such occurrence as soon as practicable.

The results of the observations shall be recorded in the logbook (required to be kept by condition 2.3), along with details of remedial action taken.

- 2.2 A daily assessment shall be made for odour emissions from the installation while the process is operating at full capacity. The assessment shall be made at a point at or beyond the installation boundary where such an emission is most likely to be detected, taking into account the wind direction, source of odour, nearest neighbour, etc. The assessment must be made by a responsible person who has been instructed to carry out these duties. A record of all olfactory assessments shall be entered into the logbook required to be kept in accordance with condition number 2.3. The records shall include a subjective assessment of the nature and severity of any odour detected.

If offensive odour emissions are detected, immediate action shall be taken to determine the cause of the emission and to resolve the malfunction responsible for the emission. Contingency arrangements shall be instigated to prevent or reduce to a minimum any further odour emissions caused by the malfunction. The regulator shall be notified of any such occurrence as soon as practicable.

- 2.3 A logbook shall be established and maintained which contains a record of all visual and olfactory observations made in accordance with conditions 2.1 and 2.2. The records shall include the time and date of the observations, the location from which the observations were made, the wind direction, the weather conditions, the likely source of the emissions to air, details of any corrective action taken, and the name and position within the Company of the person undertaking the observations. The logbook shall be kept available for inspection by an authorised officer from the regulating authority at the premises occupied by the Company, and the records shall be retained for at least two years. The log may be paper based or electronic.

- 2.4 Detailed records shall be kept of all paint, hardener, organic solvents, substrates and all equipment cleaning materials containing organic solvents used. The record shall be kept in such a way as to enable the total organic solvent usage to be calculated on a six monthly basis. A statement of the six monthly figures shall be submitted to North East Lincolnshire Borough Council within four weeks of each determination period.

Materials Handling

- 3.1 The raw materials used in the installation and all waste materials produced from the activities therein shall be handled with care to prevent or reduce to an absolute minimum any emissions to air. Coatings containing VOC shall be stored in closed storage containers.
- 3.2 Spillages of liquids and finely divided materials shall be cleaned up immediately. Liquid spillages shall be contained and cleaned up by the use of a suitable absorbent material. Spillages of finely divided or powdery materials shall be with an industrial grade vacuum cleaner or by wet cleaning methods; dry sweeping shall not be permitted. A high standard of housekeeping shall be maintained.
- 3.3 All potentially odorous waste materials shall be stored in suitable closed containers or bulk storage vessels.

All waste shall be removed from site by a licensed waste contractor. Receipts for such materials shall be kept for a minimum of two years.

All raw materials or wastes containing VOC shall be stored in well ventilated areas.

- 3.4 Drums and containers containing liquid materials, whether full, partly full or empty, shall be stored in a secure, well-ventilated storage area. All full, partly full or empty drums and containers shall be kept tightly closed to prevent any emissions to air.
- 3.5 Mixing of coatings with solvents shall be carried out within the paint store mixing areas.
- 3.6 In order to demonstrate BAT (best available technique) and minimise fugitive emissions, the emissions from the mixing of paints shall be adequately contained to minimise emissions of fugitive VOCs, by the use of closed transfer systems. This may be achieved by the use of enclosed mobile containers, containers with close-fitting lids, or, enclosed containers with pipeline delivery. Programmable scales shall be used during the mixing and preparation of coatings to reduce solvent usage.
- 3.7 Application of cleaning solvents shall either be:
 - ✦ From a contained device or automatic system when applied directly on to surfaces to be cleaned.
 - ✦ Dispensed by piston type dispenser or similar contained device, when used on wipes.
 - ✦ Via the use of Pre-impregnated wipes which shall be held within an enclosed container prior to use.

Solvent Wipes and other items contaminated with solvent shall be placed in a suitably labelled metal bin fitted with a self-closing lid. Bins shall be emptied at least daily. Special bins that allow air to circulate beneath and around them to aid cooling shall be used for materials that may undergo spontaneous combustion.

- 3.8 Where cleaning solvents are decanted into other containers they shall be contained in self-closing containers.
- 3.9 A review programme shall be undertaken to determine whether organic solvent free cleaning fluids or significantly less volatile organic solvent cleaning fluids can be used (with or without the addition of mechanical, chemical or thermal enhancements) in preference to the traditional solvent based cleaners in use at the date of issue of this permit. The evaluation shall be completed within 3 months of issue of the permit and shall provide details of potential substitute cleaning materials. Where materials are identified that can replace existing cleaning solvents, these shall be placed in use within 3 months of completing the review programme.
- The review programme itself shall be repeated every two years from the date of issue of this permit. A copy of the review programme shall be kept with the log book required to be kept by condition 2.3
- 3.10 Spraygun testing and spray out following cleaning shall be done into the equipment cleaning machine with the extraction running, or into a separate chamber which is provided with extraction. A receptacle shall be provided to collect the organic solvent which is put through the spraygun. When not in use, the receptacle shall be kept lidded to prevent evaporation and fugitive emission of organic solvent vapour.
- 3.11 All spray guns and equipment cleaning shall be carried out in the Redash automatic, totally-enclosed equipment cleaning machines or any other equipment cleaning machine which can achieve comparable or lower emissions. The cleaning machine shall be provided with the minimum of exhaust ventilation that is necessary to prevent the fugitive emission of organic solvent vapour when the machine is opened for introduction or removal of equipment, or for the changing of cleaning solvent.

Dispersion of Contained Emissions

- 4.1 Adequate insulation shall be provided to minimise the cooling of waste gases and prevent liquid condensation by keeping the temperature of the exhaust gases above the dew point.
- 4.2 A minimum discharge velocity shall be required in order to prevent the discharged plume being affected by aerodynamic down wash.
- 4.3 Stacks or vents shall not be fitted with any restriction at the final opening such as a plate, cap or cowl, with the exception of a cone which may be necessary to increase the exit velocity of the emissions.

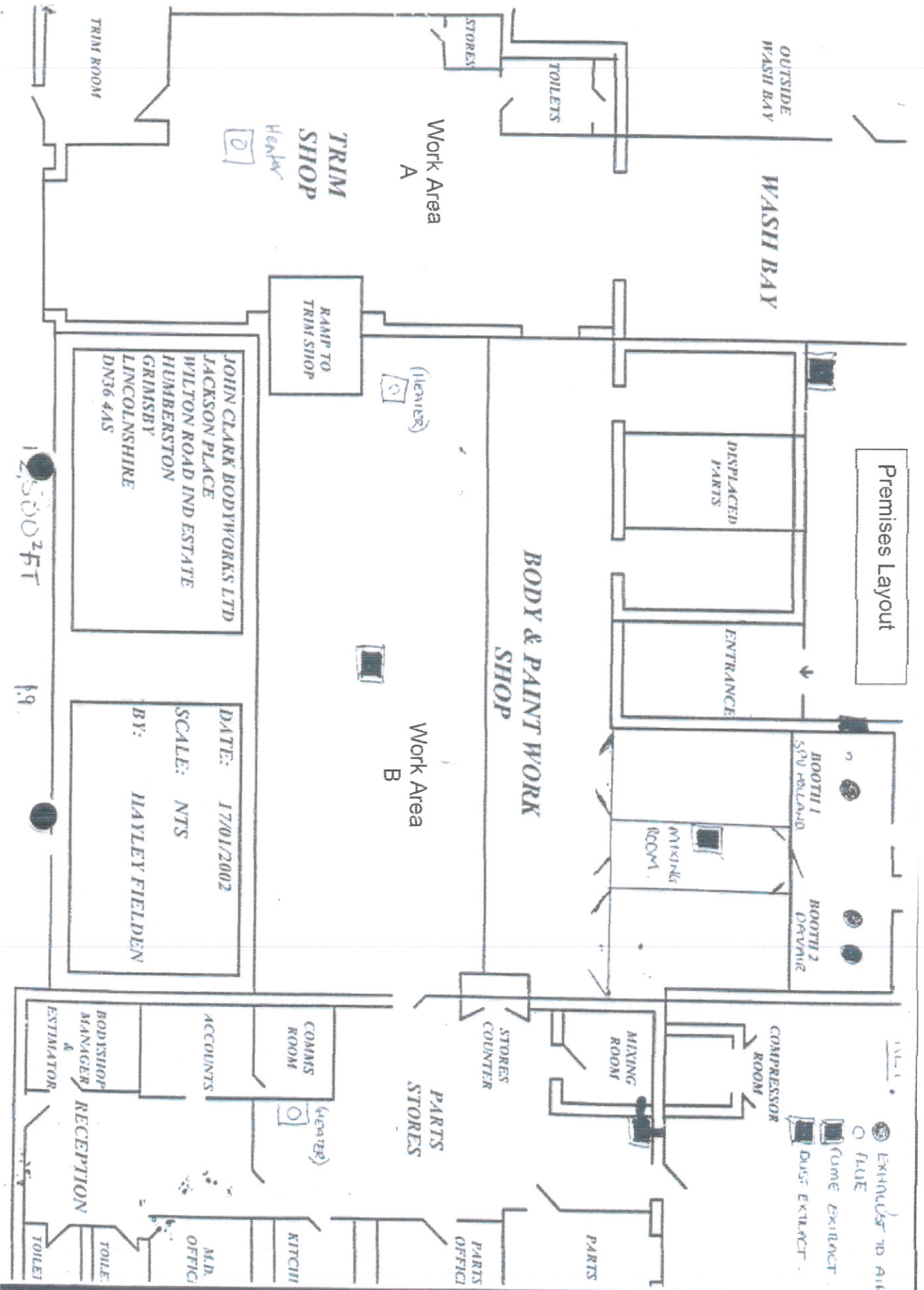
General Conditions

5.1 Regular cleaning and effective preventative maintenance in accordance with the manufacturer's instructions shall be employed on all plant and equipment concerned with the emission, capture, transport and control of emissions to atmosphere. Cleaning and maintenance schedules for such plant and equipment shall be made readily available for inspection by the regulator. Such cleaning and maintenance procedures shall be updated from time to time as may be necessary to account for changes in working practice or plant and machinery or solvents used. If the schedules change, a copy of the new schedules shall be submitted to the enforcing authority within 7 working days from changes being made.

Spares and consumables, in particular, those subject to continual wear, shall be held on site, or shall be available at short notice so that plant breakdowns can be rectified rapidly.

5.2 Staff at all levels shall receive the necessary formal training and instruction in their duties relating to control of the process and emissions to air. Records shall be kept which detail all relevant training provided to staff and the records shall be made available for inspection by an authorised officer from the regulating authority. Records of training shall be retained for two years.

5.3 Any malfunction which results in emissions to atmosphere which are likely to cause an adverse effect on the local community shall be reported to the regulator immediately, and a record shall be made of the incident within the logbook required by condition 2.3.



Glossary of Terms/Definitions:

Activity	One or more stationary technical units falling within the defined sections of the Schedule 1 of the Pollution Prevention and Control (England and Wales) Regulations 2000 (as amended).
Coating	Means a preparation, including all the organic solvents or preparations containing organic solvents necessary for its proper application, which is used in a vehicle refinishing activity to spray onto a motor vehicle.
EPA	<i>Environmental Protection Act, the former pollution control regime, now redundant due to the implementation of PPC.</i>
Halogenated Organic solvent	Shall mean an organic solvent which contains at least one atom of bromine, chlorine, fluorine or iodine per molecule
Installation	One or more stationary technical units comprising at least one activity or activities falling within the description of Schedule 1 of the Pollution Prevention and Control Regulations 2000 (as amended) within a defined area.
Organic solvent	Means 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.
LEV	Local Exhaust Ventilation – ducting and hoods normally associated with small uncontained plant or equipment
Organic compound	Means any compound containing at least the element carbon and one or more of hydrogen, halogens, oxygen, sulphur, phosphorus, silicon or nitrogen, with the exception of carbon oxides and inorganic carbonates and bicarbonates.
PPC	Pollution Prevention and Control, the new pollution control regime replacing that under EPA.
Regulator	Means the Pollution Control Unit, North East Lincolnshire Council. When contacting the regulator it is not sufficient to contact any other part of the council other than the Pollution Control Unit at the address specified on page 2 of the permit document.
Volatile Organic Compound (VOC)	Shall mean any organic compound having at 293, 15 K a vapour pressure of 0.01 kPa or more, or having a corresponding volatility under the particular conditions of use. For the purpose of the Solvents Emissions Directive, the fraction of creosote which exceeds this value of vapour pressure at 293.15 K shall be considered as a VOC.

End of Permit