

Variation Reference number 230/18

Schedule 2

Operator	Autocraft Telford Limited
Installation Address	Unit 1 Hortonwood 33 Telford TF1 7EX
Permit Reference	11/00017V_REF/090119
Grid Reference	SJ687133
Registered Office	Autocraft Telford Ltd Unit 1 Hortonwood 33 Telford Shropshire TF1 7EX
Registered Number	7168475

Autocraft Telford Ltd is hereby permitted by Telford & Wrekin Council to carry out the activity of re-painting or re-spraying of road vehicles as defined under Schedule 1, Part 2, Section 6.4, Part B(b) of The Environmental Permitting (England and Wales) Regulations 2016 ("The Regulations") and other activities as listed and described within the installation boundary marked in red on the attached plan in Appendix 1 and in accordance with the conditions within this permit.

Signed:

Date: 9 January 2019



Clair Travis

Environmental Health Officer

Authorised by the Borough of Telford and Wrekin to sign in that behalf

Provenance	Relevant Dates
Date Permit First Issued	14/04/2005
Date of Variations	05/12/2011
Date of Variations	10/05/2017
Date of Latest Variation	09/01/2019

Introductory Note – This Introductory note does not form part of the permit.

Determination of application

Particular conditions have been inserted as representing the authority's judgement of what constitutes BAT, having regard to the statutory guidance issued by the Secretary of State and to all site specific considerations.

Description of the Installation

Autocraft Telford Ltd operate an installation for the re-spraying of repaired vehicles using coatings containing volatile organic compound (VOCs) generically known as solvents. The site uses compliant coatings and all spraying of coatings is carried out within the 4 spraybooths.

Coatings are delivered within 1-5 litre tins and solvents used for cleaning are delivered in 20 litre containers. All raw materials are stored within the mixing room or within a bunded steel cabinet.

Vehicles are prepared for coating in the vehicle preparation area. There is a local exhaust ventilation system (LEV) that has drop points to allow vehicle preparation equipment such as sanders to be connected. The LEV captures particulate matter within the abatement filters to minimise the amount of particulate matter that enters the atmosphere from the ventilation stack.

The prepared vehicles are then sprayed with coatings within the spraybooth. The spraybooths are designed to capture particulate matter within its filtration system. Floor and ceiling filters are regularly changed and the booths are serviced bi-annually.

Coatings are prepared within the mixing room and gun cleaning is also carried out here. Gun cleaning is carried out within the gunwash machine.

Waste solvents are kept within a sealed drum. All empty solvent contaminated tins are either sealed or baked before being placed in the waste.

End of Introductory Note

Permit Conditions

General

1. The best available techniques shall be used to prevent, or where that is not practicable, reduce the emissions from the installation in relation to any aspect of the activity which is not specifically regulated by any condition of this permit.
2. An appropriate person (and deputy) shall be appointed as the primary point of contact with the regulator. The regulator shall be informed in writing of the appointed person (and deputy). In the event of a different person being appointed, the regulator shall be informed without delay.
3. A copy of this permit shall be kept at the installation. All relevant staff shall be made aware of its content and shall be told where it is kept.
4. If the operator proposes to make a change in the operation of the installation, they must, at least 14 days before making the change, notify the regulator on the appropriate form. The notification must contain a description of the proposed change in operation. A 'change in operation' means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.
5. All records required to demonstrate compliance with any conditions of this Permit shall be kept in an organised manner. The records shall be kept electronically or in paper form. Records:
 - a) Must be legible and any amendment entered into a record shall be made in such a way as to leave the original clear and legible.
 - b) Records shall be kept for a period of 2 years, unless otherwise stated.
 - c) Records shall be kept on-site for a minimum of 12 months. Records kept off-site, must be made available within 7 days of any request by the regulator.
6. All documentation required to be submitted to the regulator to demonstrate compliance with relevant conditions, shall be submitted in an electronic format. Submissions shall be sent to: environmental.health@telford.gov.uk

7. Only the plant and equipment listed in table 1 shall be used within the installation.

Table 1 Permitted plant and equipment		
Spraybooth number	Make	Model
Booth 1	Dalby	Genesis hi air
Booth 2	Dalby	Genesis hi air
Booth 3	Haltec	Haltec
Booth 4	Haltec	Haltec
Gunwash machine	Anesta	Iwata

Non-VOC Emissions

8. The emission limits and provisions specified in Table 2 shall apply.

Table 2 – Emission Limits				
Substances	Source	Emission limits/provisions	Type of monitoring	Monitoring frequency
Particulate matter	From spraybooths	10 mg /Nm ³	By guarantee supplied by the spray booth constructor	None required

9. All emissions of particulate matter shall be emitted from the spraybooth stacks detailed in appendix 2. The stacks shall be 10 metres above ground.
10. The introduction of dilution air to achieve emission concentration limits shall not be permitted. Dilution air may be added for waste gas cooling or improved dispersion where justified, but this must not be considered when determining the mass concentration of the pollutant in the waste gases.
11. In the case of abnormal emissions, or malfunction or breakdown leading to abnormal emissions, the operator shall:
- investigate immediately and undertake corrective action;
 - adjust the process or activity to minimise those emissions; and
 - promptly record the events and actions taken;
 - notify the regulator without delay, if the emission is likely to have an effect on the local community.
12. Dusty wastes shall be stored in closed containers.
13. Dry sweeping of dusts and dusty wastes shall not be used.

VOC Emissions

14. Surface preparation and painting operations shall be carried out using only coating materials, which are placed on the market for use in vehicle refinishing bodyshops 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.
15. The products used in coating shall be prepared and applied in accordance with the suppliers' instructions. Under no circumstances shall the product be thinned with more than the supplier's stated quantity or percentage of thinner.
16. All paint spraying operations shall be carried out in a totally enclosed booth under negative pressure, to prevent fugitive emissions of VOCs.
17. Spray applied coatings shall be applied to passenger cars using high volume low pressure (HVLP) (maximum atomisation pressure 67.5kPa).
18. Spray applied coatings shall be applied to commercial vehicles using one of the techniques in Condition 3.5 of PG6/34 or using airless spraying equipment.
19. All spray guns and equipment cleaning shall be carried out in an automatic, totally-enclosed equipment cleaning machine 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.
20. All spray gun testing and spray-out following cleaning shall be carried out in either an equipment cleaning machine with the extraction running, or into a chamber which is provided with the extraction running. This shall be in accordance with a written procedure, a copy of which shall be made available to the regulator upon request. The operator shall inform the regulator in writing of any significant changes to the written procedure.
21. Cleaning solvents shall be dispensed by a piston type dispenser or similar contained device, when used on wipes.
22. Solvent contaminated wipes and other solvent wastes shall be handled in accordance with a written procedure a copy of which shall be made available to the regulator upon request. The operator shall inform the regulator in writing of any significant changes to the written procedure.
23. Organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas.
24. All solvent containing coatings, thinners and related materials and equipment cleaning materials shall be stored:



- a) In the containers in which they were supplied, with the lid securely fastened at all times other than when in use;
 - b) within spillage collectors, of suitable impervious and corrosion proof materials and capable of containing 110% of the largest container;
 - c) away from sources of heat.
- 25.** Cleaning operations involving organic solvents shall be reviewed every two years, to identify opportunities for reducing VOC emissions. This will include identification of cleaning steps that can be eliminated or alternative cleaning methods. The regulator shall be provided with a report on the conclusions of the review, within eight weeks of it being completed.
- 26.** Spares and consumables, particularly those subject to continual wear shall be held on site, or shall be available at short notice from guaranteed suppliers, so that spraybooth and abrasive blasting plant breakdowns can be rectified rapidly.
- 27.** Waste solvents and waste coatings shall be recycled off site. Copies of receipts of waste materials sold for recycling shall be kept for three years.

Visible and Odourous Emissions

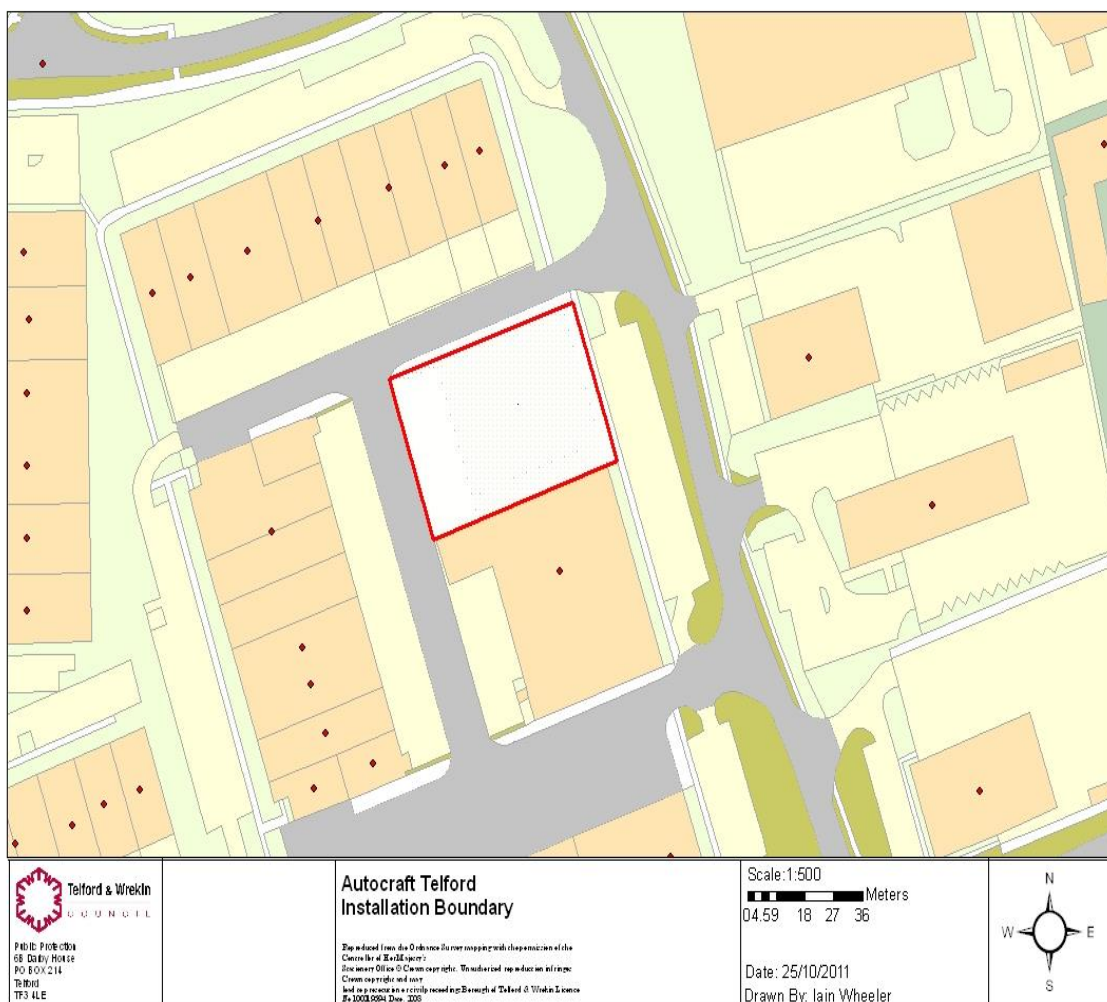
- 28.** All releases to air, other than condensed water vapour, shall be free from persistent visible emissions.
- 29.** All emissions to air shall be free from droplets.
- 30.** There shall be no visible emissions or offensive odour beyond the site boundary, as perceived by the regulator.
- 31.** Emissions from combustion processes shall in normal operation be free from visible smoke.

Management

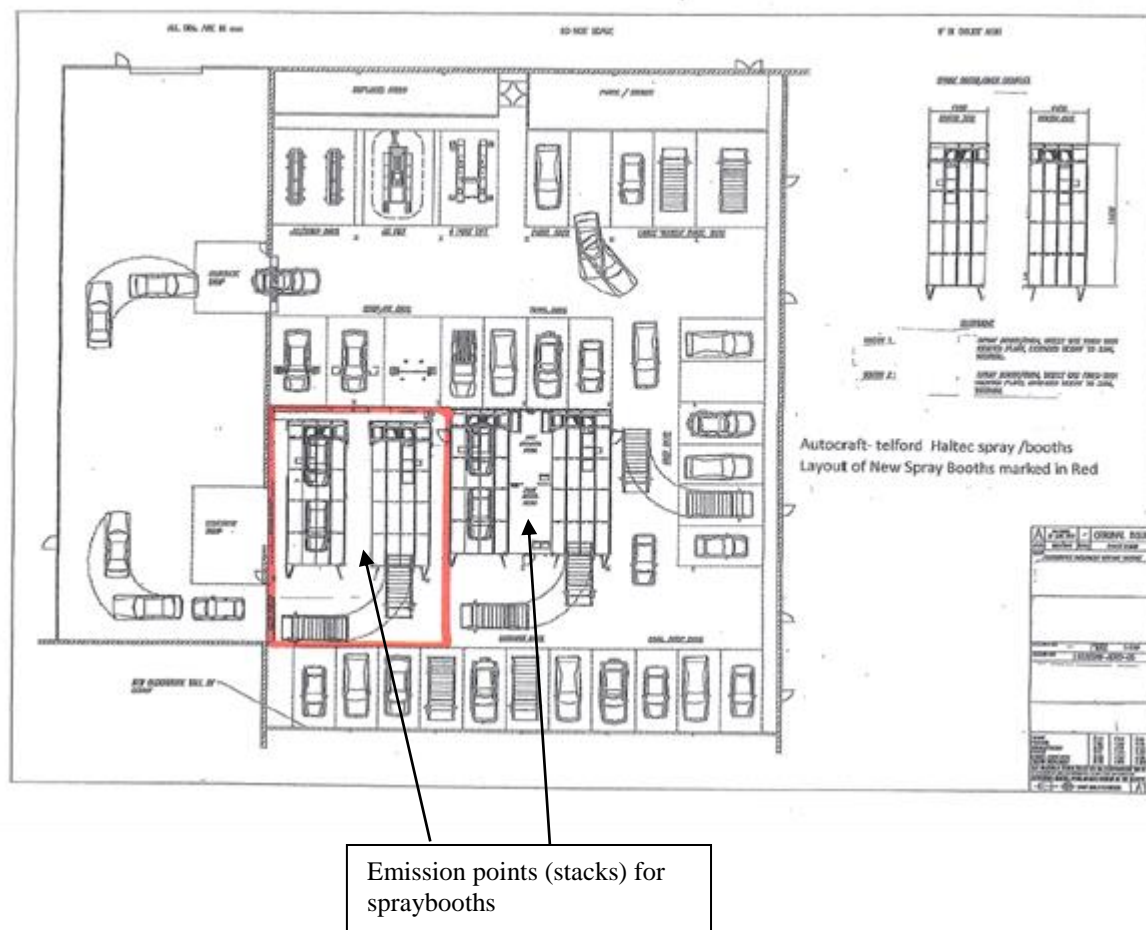
- 32.** All staff whose functions could impact on air emissions from the activity shall receive appropriate training and instruction. This shall include:
- a. awareness of their responsibilities under the permit;
 - b. steps that are necessary to minimise emissions during start-up and shutdown;
 - c. actions to take when there are abnormal conditions, or accidents or spillages that could, if not controlled, result in emissions.

33. The operator shall maintain a statement of training requirements for each post with the above mentioned functions and keep a record of the training received by each person. These documents shall be made available to the regulator on request.
34. The operator shall implement a maintenance schedule a copy of which shall be made available to the regulator upon request. The operator shall inform the Council in writing of any significant changes to the schedule.

Appendix 1. Location of Installation Plan



Appendix 2. Location of Spraybooth Stacks



End of Permit Conditions

This section does not form part of the permit, but contains guidance relevant to it.

Inspections

Regular inspections will be made by officers of Telford & Wrekin Council (without prior notice), in order to check and ensure full compliance with this permit. Inspection will be carried out in accordance with a risk assessment, and/or following from any complaints or applications.

BAT (Best Available Techniques)

Article 2(11) of the IPPC Directive defines “best available techniques” as follows:

“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”.

- “techniques” shall include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned,
- “available” techniques shall mean those developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the costs and advantages, whether or not the techniques are used or produced inside the Member State in question, as long as they are reasonably accessible to the operator,
- “best” shall mean most effective in achieving a high general level of protection of the environment as a whole.

In determining the best available techniques, special consideration should be given to the items listed in Annex IV of the Directive.

Confidentiality

The permit requires the operator to provide information to the regulator. The regulator will place the information onto the public register in accordance with the Regulations. If the operator considers that any information provided is commercially confidential, it may apply to the council to have such information withheld from the register as provided in the Regulations.

Health and Safety at Work and Other Statutory Requirements

Compliance with this permit does not necessarily infer compliance with any other legislation.

Notification of Changes to the activity or Operator

If the operator proposes to make a change in the operation of the installation, they must, at least 14 days before making the change, notify the regulator on the appropriate form. The notification must contain a description of the proposed change in operation. A ‘change in operation’ means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.

The operator may be liable to prosecution if they operate otherwise than in accordance with the conditions and plant described in this permit.

Transfer of the permit

Before the permit can be wholly or partially transferred to another person, an application to transfer the permit has to be made jointly by the existing and proposed operators. A transfer will be allowed unless the regulator considers the proposed operator will not be the person who will have control over the operation of the installation, or will not comply with the conditions of the transferred permit.

Surrender of the permit

Where the operator intends to cease the operation of an installation (in whole or in part). In the case of Part B Permits, the operator must notify the Council on the appropriate form in accordance with Regulation 24. For A2 permits, the operator must apply for a surrender, using the appropriate form and in accordance with Regulation 25 and part 1 of Schedule 5.

Risk Rating

Procedures and records shall be examined during inspections and will be referred to during the Department of Food and Rural Affairs (DEFRA) risk rating, carried out to determine the risk category: LOW, MEDIUM or HIGH which will determine the annual subsistence fee and the inspection frequency of the regulator.

Enforcement

The operator will be liable to enforcement action where: -

- a) the operator fails to comply with or contravenes any permit condition;
- b) a change is made to the installation operation without prior notification of the change to the regulator;
- c) intentional false entries are made in any record required to be kept under the conditions of the permit;
- d) false or misleading statement is made.

Any enforcement action is taken in accordance with the regulator's enforcement policy.
<http://www.telford.gov.uk/NR/rdonlyres/240C3F4A-8E36-4C12-8311-E4E57A3DF8CC/26214/MicrosoftWordEnvironmentalHealthandWellbeingEnforc.pdf>

Annual Subsistence Charge

An annual subsistence fee is payable in order to operate your installation. An invoice will be issued annually by the regulator which will include details of how to pay. The charges are based on the DEFRA risk rating. Details of the risk assessment can be found at <http://www.defra.gov.uk/environment/ppc/localauth/fees-risk/risk.htm>.

You are reminded that failure to pay the subsistence fee may result on the Permit being revoked. It is an offence to operate a regulated facility without a permit and upon summary conviction liable to a maximum fine of £50,000 and/or imprisonment.

Appeal against Regulatory Action

The operator can appeal against regulatory action by the regulator to the Secretary of State for Environment, Food & Rural Affairs. Appeals must be made in accordance with Regulation 31 and sent to the Secretary of State for Environment Food and Rural Affairs. The appeal for can be found at:

http://www.planning-inspectorate.gov.uk/pins/environment/environmental_appeals/environmental_perm_itting_appeal_form.pdf

Guidance on the appeal procedure can be found at

http://www.planning-inspectorate.gov.uk/pins/environment/environmental_appeals/environmental_perm_itting_guidance_notes.pdf

There are time limits for making an appeal as follows:

- a) in relation to an appeal against a revocation notice, before the notice takes effect;
- b) in relation to the withdrawal of a duly-made application under paragraph 4(2) of Schedule 5, not later than 15 working days from the date of the notice served under that paragraph;
- c) in relation to a variation notification, a suspension notice, an enforcement notice or a landfill closure notice, not later than 2 months from the date of the notification or notice;
- d) in any other case not later than 6 months from the date of the decision or deemed decision.

Please note:

An appeal 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 other conditions not subject to the appeal and to direct the local authority either to vary any of these other conditions or to add new conditions.

Contact Numbers for the Regulator

The Regulator is the Public Protection Team of Telford & Wrekin Council. They can be contacted on 01925 381 818. You may also contact them by email at any time. environmental.health@telford.gov.uk

Correspondence Address

All correspondence to Telford & Wrekin Council relating to this information shall be addressed to: Customer and Neighbourhood services, Public Protection, Telford and Wrekin Council, Addenbrooke House, Telford, TF3 4NT.