

EPA/00002/19

Local Air Pollution Prevention and Control, LAPPC



PERMIT (PART B)

PART B PROCESS – RESPRAYING OF ROAD VEHICLES

New Permit Ref: EPA/00002/19
PG 6/34/11 (July 2013) – Respraying of Road Vehicles

Issued by:
CHILTERN & SOUTH BUCKS DISTRICT COUNCIL

Pollution Prevention and Control Act 1999
Pollution Prevention and Control (England & Wales) Regulations 2000,
Part 2 of schedule 3 of the PPC Regulations, SI 2000/1973
Environmental Permitting (England & Wales) Regulations 2016

CLAIRE
Chiltern's Local AIR & Environment

Bucks Bodyfix Limited – Maiden permit 2018/2019

TO: **Mr. Bogdan Moise, Bucks Bodyfix Limited, 16 Lynton Road, Chesham. England HP5 2BU, Company Number: 10169174**
(Name and registered office of operator (hereinafter referred to as "the operator"))

RE: **Bucks Bodyfix Limited, 282 Bellingdon Road, Chesham Bucks HP5 2NN (the premises in which the scheduled process is carried out are identified on the plans marked EPA/00002/19/P1 attached to and forming part of this Permit)**

The above named company i.e. known as ('the Operator') is hereby permitted by Chiltern & South Bucks District Councils ('the Regulator') to operate a scheduled process namely a Vehicle Refinishing installation at the address given above. This process involves the Respraying of Road Vehicles (Chapter 6, section 6.4 'repainting or re-spraying road vehicles or parts of them, any associated activity that may result in the release into the air of particulate matter or of any volatile organic compound and where the carrying on of

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the activity is likely to involve the use of 1 tonne or more of organic solvents in any period of 12 months', This shall be in accordance with the statutory provisions of the Pollution Prevention and Control Regulations 2000 ('the regulations') as amended by The Solvent Emissions (England and Wales) Regulations 2004 ('SED regulations') (New Section 7-SED Activities) in accordance with the following 36 Conditions.

Description of the Scheduled Installation

Vehicles are cleaned and prepared prior to refinishing, using organic or aqueous cleaners and abrasive blasting. Extraction is used to remove sanding dust from the workplace. Vehicles are refinished in 3 X vehicle spray booths/Ovens utilizing High-Volume Low-Pressure (HVLP) spraying. Air is extracted from the spray booths to the external environment. After pretreatment and preparation, a corrosion protection primer or primer surfacer may be applied. A coat of surfacer is then sprayed prior to the application of a topcoat, in one, two or three coats. The application of primers, fillers and topcoat is accompanied by the processes of seam sealing, stone chip protection, cavity sealing and undersealing. Spray guns are cleaned in fully enclosed gun cleaners and air is extracted to the external environment.

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Conditions

Non-Voc emissions

The following non-VOC emission limits shall apply:

Table 1 – The following non-VOC emission limits shall apply:					
	Substance	Source	Emissions limits/provisions	Type of monitoring	Monitoring frequency
1	Particulate matter	From spray booths	10mg/Nm ³	By guarantee supplied by the spray booth constructor (see B3 of the application)	None required
		[Abrasive blasting equipment and other sources (except spray booths)]	[50 mg/Nm ³ from contained sources]	Manual extractive testing in accordance with BS6069: Section 4.3 1992.	[in accordance with the written plan (see B7 of the application)]
2	Sulphur dioxide	All processes/ activities	1% wt/wt sulphur in fuel	Certification by supplier on first delivery	None required
		All processes/ activities using gas oil as defined in the sulphur content of certain liquid fuels	0.1% wt/wt sulphur in fuel		
All emissions shall be determined at the standard reference conditions of 273.15K and 101.3k Pa. without correction for water vapour content.					

1. 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.

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2. 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

3. Dusty wastes shall be stored in closed containers.

4. Dry sweeping of dusts and dusty wastes within the spray booths shall not be used.

5. The operator shall keep records of inspections, tests and monitoring in relation to the provisions of the table above. In such cases:

- current records shall be kept on site and made available for the regulator to examine;
- current records shall be kept on site and made available for the regulator to examine;
- records shall be kept by the operator for at least **two years**.

6. The operator shall notify the regulator at least **7 days** before any periodic monitoring exercise to determine compliance with the abrasive blasting particulate emission limit values. The operator shall state the provisional time and date of monitoring, pollutants to be tested and the methods to be used.

7. Within **8 weeks** of the completion of monitoring activities, the results of non-continuous emission testing shall be forwarded to the regulator.

8. In the event of any adverse results from any monitoring activity in relation to the provisions of the above table, the operator shall investigate as soon as the results are received. The operator shall:

- identify the cause and take corrective action;
- record as much detail as possible regarding the cause and extent of the problem;
- record the action taken by the operator to rectify the situation;
- re-test to demonstrate compliance as soon as possible; and
- notify the regulator.

9. 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.

VOC emissions

10. 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 body-shop products that are covered by this permit are listed in **Appendix 3 of Process Guidance Note 6/34 (11) – Copy attached**.

11. 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.

For information, the maximum, application-ready VOC contents for individual categories of products are listed in Table 2 below:

Table 2 – Compliant coatings			
Product subcategory		Coatings	VOC g/l(*)
a	Preparatory and cleaning	Preparatory	850
		Pre-cleaner	200
b	Bodyfiller/stopper	All types	250
c	Primer	Surface/filler and general (metal) primer	540
		Wash primer	780
d	Topcoat	All types	420
e	Special finishes	All types	840
(*) g/l of ready for use product. Except for subcategory (a) any water content of the product ready for use should be discounted			

12. All paint spraying operations shall be carried out in a totally enclosed booth under negative pressure, to prevent fugitive emissions of VOCs.

13. Spray applied coatings shall be applied to passenger cars using high volume low pressure (HVLP) (maximum atomisation pressure 67.5kPa) spraying equipment.

14. Spray applied coatings shall be applied to commercial vehicles using one of the techniques in Condition 3.5 of PG6/34(11) or using airless spraying equipment.

15. All spray guns and equipment cleaning shall be carried out in 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.

16. 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 extraction which is running in accordance with a written procedure 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 written procedure.

17. Cleaning solvents shall be dispensed by a piston type dispenser or similar contained device, when used on wipes.

18. Pre-impregnated solvent wipes shall be held within an enclosed container prior to use.

19. 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. The operator shall inform the Council in writing of any significant changes to the written procedure.

20. Organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas.

21. All solvent containing coatings, thinners and related materials and equipment cleaning materials shall be stored:

- in the containers in which they were supplied, with the lid securely fastened at all times other than when in use;

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- within spillage collectors, of suitable impervious and corrosion-proof materials and capable of containing 110% of the largest container;
- away from sources of heat.

(For information, these conditions should not conflict with the requirements of occupational health and safety regulations)

22. All solvent containing wastes shall be stored:

- in suitable sealed containers with a securely fastened lid, and labelled so that all that handle them are aware of their contents;
- within spillage collectors, of suitable impervious and corrosion-proof materials and capable of containing 110% of the largest container;
- away from sources of heat.

23. 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.

24. 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.

25. 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 odorous emissions

26. All releases to air, other than condensed water vapour, shall be free from persistent visible emissions.

27. All emissions to air shall be free from droplets.

28. There shall be no offensive odour beyond the site boundary, as perceived by the Regulator.

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

General Conditions

30. All emissions from the stacks will be PM11 from the stacks. The stack heights shall be so placed as not to create a nuisance to neighbours.

31. The activity shall operate in accordance with an Environmental Management System compliant with industry standards such as ISO 14001: 2015

32. Staff at all levels shall receive the necessary training and instruction [Insert key elements of the training and instruction programme intended to be used]

33. Staff training shall be reviewed annually and a record of staff training and instruction shall be maintained by the Operator with a copy of records of acceptance training forwarded to the Council by end January

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34. A written record of all maintenance carried out in accordance with Condition 2 shall be made available for inspection by the regulator.

Best available techniques

35. The best available techniques 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.

36. If the operator proposes to make a change in operation of the installation, he must, at least **14 days** before making the change, notify the regulator in writing. The notification must contain a description of the proposed change in operation. 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. In this condition „change in operation“ means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.



Signed:
Senior Environmental Protection Officer

Date: 17th January 2019.



Signed.....
Environmental Health Manager

Date.....17.1.2019.....

**Chiltern & South Bucks District Council
Council Offices
King George V House
King George V Road
Strategic Environment Team
Healthy Communities Unit
Amersham
Buckinghamshire
HP6 5AW**

(Address to which communications should be sent)

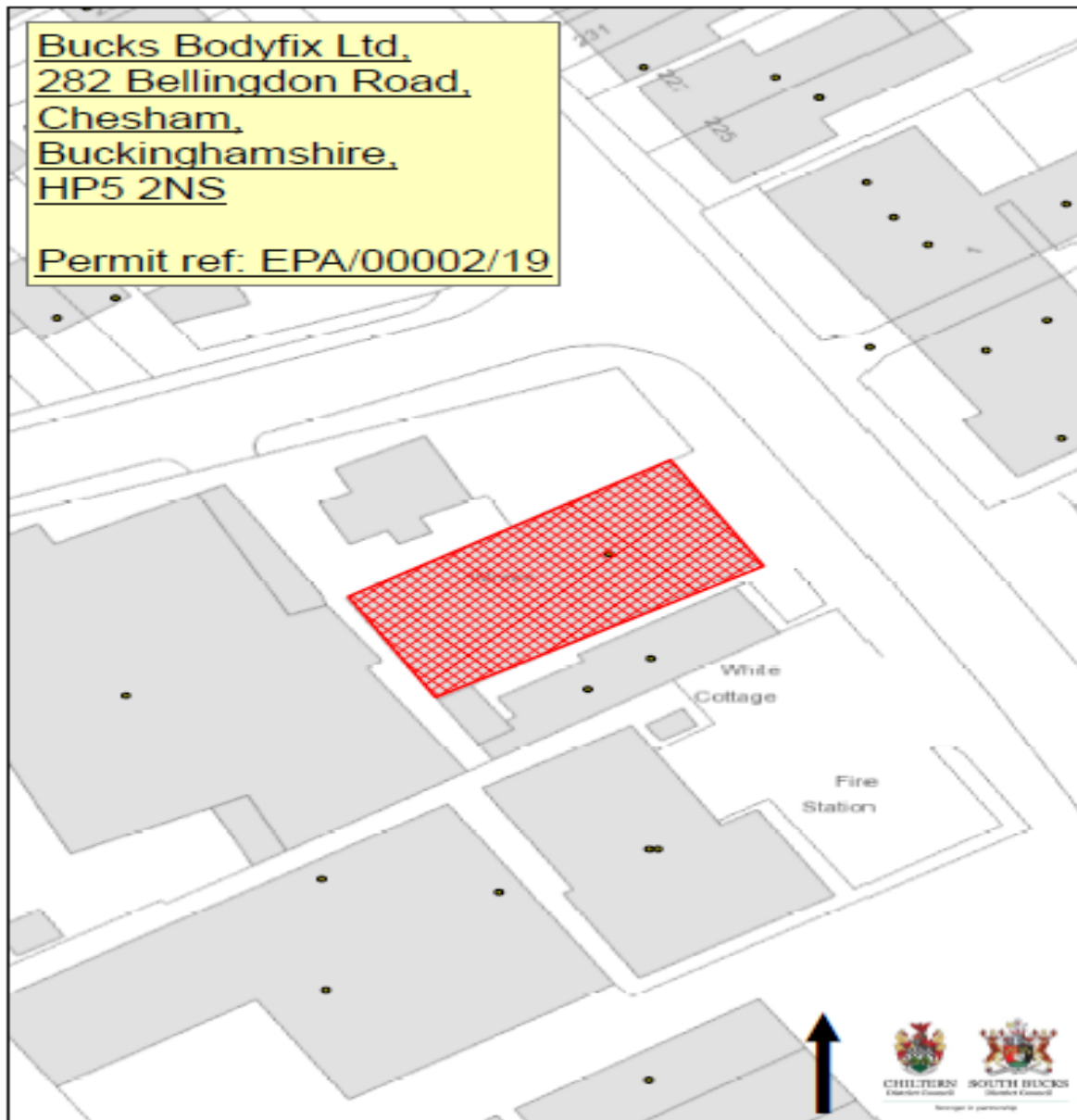
Appendices

Appendix 1 – Site Outline Plan/Map

Appendix 2 – Compliant Coatings Table

Appendix 3 – Individual Bodyshop Products covered

Appendix 1 – Site Outline Plan/Map



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Appendix 2 – Complaints Coating Table (See Condition 11)

Table 2 – Compliant coatings			
Product subcategory		Coatings	VOC g/l(*)
a	Preparatory and cleaning	Preparatory	850
		Pre-cleaner	200
b	Bodyfiller/stopper	All types	250
c	Primer	Surface/filler and general (metal) primer	540
		Wash primer	780
d	Topcoat	All types	420
e	Special finishes	All types	840
(*) g/l of ready for use product. Except for subcategory (a) any water content of the product ready for use should be discounted			

Appendix 3- Individual Body shop products covered by this permit (Culled from PG 6/34 [11])

Individual body-shop products covered by this permit

- A) **Preparatory and cleaning'** means products designed to remove old coatings and rust, either mechanically or chemically, or to provide a key for new coatings:
- (i) Preparatory products include gunwash (a product designed for cleaning spray-guns and other equipment), paint strippers, degreasers (including anti-static types for plastic) and silicone removers;
 - (ii) Precleaner' means a cleaning product designed for the removal of surface contamination during preparation for and prior to the application of coating materials;
- B) **Bodyfiller/stopper'** means heavy-bodied compounds designed to be applied to fill deep surface imperfections prior to the application of the surfacer/filler;
- C) **Primer'** means any coating that is designed for application to bare metal or existing finishes to provide corrosion protection prior to application of a primer surfacer:
- (i) surfacer/filler' means a coating designed for application immediately prior to the application of topcoat for the purpose of corrosion resistance, to ensure adhesion of the topcoat, and to promote the formation of a uniform surface finish by filling in minor surface imperfections;
 - (ii) general metal primer' means a coating designed for application as primers, such as adhesion promoters, sealers, surfacers, undercoats, plastic primers, wet-on-wet, non-sand fillers and spray fillers;
 - (iii) wash primer' means coatings containing at least 0,5 % by weight of phosphoric acid designed to be applied directly to bare metal surfaces to provide corrosion resistance and adhesion; coatings used as weldable primers; and mordant solutions for galvanised and zinc surfaces;
- D) **Topcoat'** means any pigmented coating that is designed to be applied either as a single-layer or as a multiple-layer base to provide gloss and durability. It includes all products involved such as base coatings and clear coatings:
- E) **Base coatings'** means pigmented coatings designed to provide colour and any desired optical effects, but not the gloss or surface resistance of the coating system;
- F) **Clear coating'** means a transparent coating designed to provide the final gloss and resistance properties of the coating system;
- G) **Special finishes'** means coatings designed for application as topcoats requiring special properties, such as metallic or pearl effect, in a single layer, high-performance solid-colour and clear coats, (e.g. anti-scratch and fluorinated clear- coat), reflective base coat, texture finishes (e.g. hammer), anti-slip, under-body sealers, anti-chip coatings, interior finishes; and aerosols.

EXPLANATORY NOTES

1. You should note that Regulation 12(10) of the Pollution Prevention and Control Regulations 2000 provides that, in relation to any aspects of the process not regulated by conditions 1-27, the best available techniques (BAT) shall be used.
2. Regulation 3 (1) of the Pollution Prevention and Control Regulations 2000 describes "BAT" as 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 practical, generally to reduce emissions and the impact on the environment as a whole.
 - (a) "**available techniques**" means those techniques which have been developed on a scale which allows implementation in the relevant industrial sector, under 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.

Schedule 2 of the Regulations shall have effect in relation to the determination of best available techniques.

3. Regulation 11 sets out the general principles of operation of scheduled installations. The general principles are that installations and mobile plant should be operated in such a way that -
 - (A) all the appropriate preventative measures are taken against pollution, in particular through application of the best available techniques; and
 - (B) no significant pollution is caused.
4. This permit is issued under Regulation 10 of the Pollution Prevention and Control Regulations 2000. The responsibilities you have under legislation for Health, Safety and Welfare in the workplace remain in force.
5. This permit does not detract from any other statutory requirements such as any need to obtain planning permission, building regulations approval, waste disposal licence or discharge consent from the Environment Agency.
6. Relevant or substantial changes to a scheduled installation require notification in writing and may require variation in the conditions of a Permit.
7. The annual fee or the first instalment for the time being as prescribed by the Secretary of State shall be paid in advance, on or before 1st April each year, except for the first pro-rata subsistence fee from the current year, which shall be paid within 28 days of the date of invoice by the Council.

APPEAL AGAINST PERMIT CONDITIONS

Any person who is aggrieved by the conditions attached to a permit can appeal to the Secretary of State for Environment, Food & Rural Affairs. Appeals must be received by the Secretary of State no later than 6 months from the date of the decision (the date on the bottom of the permit).

Appeals relating to installations in England should be received by the Secretary of State for Environment, Food & 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 PN**

The appeal must be in the form of a written notice or letter stating that the person wishes to appeal and listing the condition(s) which is/are being appealed against. The following five items must be included;

- a) A statement of the ground of appeal;
- b) A copy of any relevant application;
- c) A copy of any relevant permit;
- d) A copy of any relevant correspondence between the person making the appeal (“the appellant”) and the Council;
- e) A statement indicating whether the appellant wishes the appeal to be dealt with
 - by a hearing attended by both parties and conducted by an inspector appointed by the Secretary of State; or
 - by both parties sending the Secretary of State written statements of their case (and having the opportunity to comment upon one another’s statements).

At the same time, the notice of appeal and documents (a) and (e) must be sent to the Council, and the person making the appeal should inform the appropriate Secretary of State that this has been done.

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 to either vary any of these conditions or to add new conditions.

References

1. The Secretary of States Guidance PG6/34 (11) “Secretary of State’s Guidance for respraying of road vehicles (Revised: July 2013)”. DEFRA. www.defra.gov.uk/environment/airquality/lapc/pgnotes/default.htm
2. The Secretary of States Guidance PB8094 “General Guidance Manual on Policy and Procedures for A2 and B Installations April 2012. DEFRA.
3. The Pollution Prevention and Control regulations 2000