



Hereby Permit

R.F.BRADNOCK LIMITED,
UNITS 4A & 5 HAWTHORN INDUSTRIAL ESTATE,
MIDDLEMORE ROAD, SMETHWICK,
BIRMINGHAM, B21 0BZ

To Operate A Part B Installation At

R.F.BRADNOCK LIMITED, T/A RICHMOND MOTORS GROUP
STOURBRIDGE ROAD, LYE

Under The Provisions of

THE POLLUTION PREVENTION AND CONTROL ACT 1999

THE POLLUTION PREVENTION AND CONTROL (ENGLAND AND WALES)
REGULATIONS 2000 (AS AMENDED)

SOLVENTS EMISSIONS (ENGLAND AND WALES) REGULATIONS 2004

Permit Reference Number

PB/40

Date Initial Permit Issued

14th March 2005


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Dated: 14th March 2005

Tim Glews

Environmental Protection Manager

(Authorised to sign on behalf of Dudley Metropolitan Borough Council)

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INTRODUCTORY NOTE TO PERMIT

The Permit is issued by Dudley Metropolitan Borough Council (the Council) under Regulation 10 of the Pollution Prevention and Control (England and Wales) Regulations 2000 (S.I. 2000 No.1973), as amended, ("the PPC Regulations") to operate an Installation carrying out activities covered by the description in Part 1 of Schedule 1 of the PPC Regulations, to the extent authorised by the Permit.

Aspects of the Installation not regulated by specific Permit conditions are subject to a general condition implied by Regulation 12(10) of the PPC Regulations i.e. the operator must use the best available techniques for preventing or, where that is not practicable, 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.

The requirements of this Permit shall be effective from the date of service unless otherwise specified within the Permit. Where a Variation Notice has been served the conditions contained within that Variation Notice shall be effective from the date that the Notice is served, unless a specific implementation date is allocated to specific conditions.

For the purpose of this Permit the legal operator of the Installation is R.F. Bradnock Limited, Unit 4A & 5 Hawthorn Industrial Estate, Middlemore Road, Smethwick, Birmingham.

DESCRIPTION OF INSTALLATION

The Installation carries out the respraying of road vehicles and where necessary the repair of bodywork.

- Any indentations which are to be repaired are sanded and filled. The filler is then sanded.
- The area of the vehicle to be painted is then cleaned using a spirit wipe.
- The coating is then applied to the vehicle in one of the spray booths on site .
- Spray guns are cleaned in an enclosed cleaning unit.

This Installation falls within the definition of Part 1 Section 6.4, "coating activities, printing and textile treatments" of Schedule 1 of the Pollution Prevention And Control (England and Wales) Regulations 2000 (as Amended). The attached location plan "Appendix 1 – Site Plan PB/40" shows the designated site.

STATUS LOG

Detail	Reference	Date
Deemed Application Made	PB/40	1 st April 2004
Permit Issued	PB/40	14th March 2005

CONDITIONS

1.0 THE PERMITTED INSTALLATION

- 1.1 The Permitted Installation shall be comprised of the activities and associated activities specified in Table 1.1

Activity listed in Schedule 1 of PPC Regulations or Associated Activity	Description of specified activity
Section 6.4, Part B, (b) – repainting or re-spraying of motor vehicles or parts.	Repainting or re-spraying of road vehicles or parts of them and the activity is likely to involve the use of 1 tonne or more of organic solvents in any period of 12 months.
Section 7 – SED activity.	The coating of road vehicles where the annual solvent consumption is greater than 0.5 tonne.
Directly Associated Activity Handling of raw materials	Handling of all raw materials including receipt through to sending material via a designated process route.
Directly Associated Activity Handling of waste materials	Collection and storage of waste including waste coatings, particulate matter, and used filters.

- 1.2 The activities Permitted under condition 1.1 shall not extend beyond the site, being the area shown hatched on the Site Plan PB/40 in Appendix 1 to this Permit.
- 1.3 If there is any intention to implement operational changes, or any other aspect which may affect emissions to air, the Council, shall be notified of the proposed changes at least 4 weeks before the changes take place.

2.0 EMISSION LIMITS AND CONTROL

- 2.1 All emissions to air shall be free from persistent visible emissions.
- Emissions which comply with the provisions of condition 2.2 and consist entirely of steam and/or condensed water vapour are permissible.
- 2.2 All emissions to air shall be free from offensive odour outside the Installation boundary as perceived by an authorised officer of the Council.
- 2.3 All emissions to air from spray booths shall not exceed the emission limit in Table 2.1

Pollutant	Emission Source	Concentration Limit
Total particulate matter	Stacks serving the spray booths	10mg/m ³

- 2.4 The maximum content of organic solvents, (in grammes per litre (less water)), which may be present in the coatings as applied shall not exceed the amounts specified in Table 2.2 below.

Table 2.2	
Coating Category	grammes of VOC/litre of coating (less water)
Gun Wash	850
Pre-cleaner	200
Wash primer	780
Pre-coat	540
Primer surfacer	540
Non-sand surfacer	540
Primers for wet-on-wet top coat applications	540
1 coat conventional	420
2 coats base and clear	420
3 coats top coat system	420
Special Products:	
Special products	840

3.0 SOLVENTS EMISSIONS

- 3.1 The Operator shall notify the Council in writing by 1st July 2005 which of the following routes of compliance it shall follow in order to reduce contained and fugitive emissions of Volatile Organic Compounds from the Installation:
- (a) implementing a solvent reduction scheme in accordance with Paragraphs 5.7 – 5.8 inclusive and Table 6 of Process Guidance Note 6/34(04) – “Secretary of State’s Guidance for Respraying of Road Vehicles”;
 - (b) complying with the emission limit in waste gases and the fugitive emission values in accordance with SED Box 5 of Process Guidance Note 6/34(04) – “Secretary of State’s Guidance for Respraying of Road Vehicles”.

The notification shall include details of how the Operator shall implement the chosen route of compliance.

- 3.2 At no time shall the operator introduce any substance or preparation into the Installation which, by reason of the Chemicals (Hazard Information and Packaging for Supply) Regulations 1994, is labeled with the risk phrase of R45, R46, R49, R60 or R61, without the prior written consent of the regulator.

4.0 MONITORING SAMPLING AND MEASUREMENT OF EMISSIONS

- 4.1 The Installation shall be assessed for emissions of odour to air once per shift for a period of at least 5 minutes. The olfactory assessment shall be made from points on the Installation boundary where odour emissions are most likely to be detected taking into account the wind direction, wind speed, source of odour and location of receptors, by a responsible person who has been instructed to carry out these duties.

A record of all olfactory observations shall be maintained in accordance with condition 7.1.

The records shall include a subjective assessment of the nature and severity of any odour detected, the wind direction and strength, weather conditions, likely source of emissions to air, details of any corrective action taken and the identity of the person making the record.

If odour emissions are detected which may contravene any condition of this Permit immediate action shall be taken to determine the cause of the emission and to prevent or minimise further emissions. The Council shall be notified of any such occurrence as soon as practicable.

- 4.2 The chimneys serving the spray booths/ curing ovens shall be observed for any visible emissions to air once per shift for a period of at least five minutes. The observations shall be made from a position providing an unobstructed view of the point of emission to air by a responsible person who has been instructed to carry out these duties. The records shall include an assessment of the nature and severity of any emission observed, the source of emissions to air, details of any corrective action taken and the identity of the person making the record. Records of all observations shall be maintained in accordance with condition 7.1.
- 4.3 The emissions from the stacks serving the spray booths shall be monitored for total particulate matter within 3 months of the date of issue of this Permit and every 12 months thereafter. During the monitoring exercise the process being monitored must be operated under normal conditions at full capacity. The concentrations of the pollutants measured in emissions to air shall be expressed at reference conditions 273K and 101.3kPa, the results shall be expressed in milligrams per cubic metre [mg/m^3] Monitoring shall be carried out in accordance with the main procedural requirements of BS 6069: Section 4.3 1992, averages taken over operating periods excluding start-up, shutdown and periods with no spraying.

5.0 PROCESS CONTROLS

- 5.1 All paint spraying shall be carried out in totally enclosed booths under negative pressure with the extraction systems operating, thereby minimising fugitive emissions of odour and particulate matter to atmosphere.
- 5.2 Coating shall be applied with High Volume Low Pressure (HVLP) spray guns or by using other systems that have a paint transfer efficiency of at least 65%.
- 5.3 The paint booths/curing ovens shall have pressure gauges which shall be checked at the start of each spray job to ensure that the booths are not under positive pressure. Any adverse readings shall be recorded in accordance with condition 7.1. If positive pressure is detected spraying shall stop immediately and shall not re-commence until the necessary remedial action has been undertaken to return the pressure gauge reading to normal operating parameters.
- 5.4 The paint booths/curing ovens shall be fitted with automatic booth extraction shut-down systems to prevent spraying in the event of positive pressure. These systems shall be linked to an audible and visual alarm to warn of positive pressure situations. They shall also be tested at least every 6 months and be maintained in a sound

working condition. A record of any testing carried out in accordance with this condition shall be maintained in accordance with condition 7.1

- 5.5 Spillages of liquids and dusty materials shall be cleaned up immediately. Liquid spillages shall be contained and removed by the use of a suitable absorbent material. Spillages of dusty materials shall be removed by a method, which prevents or minimises dust emissions. Dry sweeping shall not be permitted.
- 5.6 Accumulations of waste particulate matter and used filters arising from spray booth operation shall be collected and transported around the site in covered containers or sealed bags and stored whilst awaiting removal for disposal in covered containers or sealed bags within a waste materials skip or inside an enclosed building.
- 5.7 Drums and containers containing liquid materials containing Volatile organic compounds, whether full, partly full or empty, shall be kept tightly closed to prevent any emissions to air.
- 5.8 The Operator shall, by 1st May 2005, and annually thereafter submit to the Council a calculation of the annual "consumption of organic solvent" (C). The calculation shall be carried out in accordance with the "solvent management plan" attached to this Permit as Appendix 2.
- 5.9 Chimneys and vents from which it is necessary to achieve dispersion of the residual pollutants shall not be fitted with any restrictive plates, caps or cowls at the final opening other than a cone to effect adequate efflux velocity.
- 5.10 All spray gun cleaning and associated equipment shall take place in a totally enclosed gun-cleaning machine.
- 5.11 Spray gun testing and spray-out shall take place into the designated gun-cleaning machine with the extraction system operating.
- 5.12 All solvent soaked wiping cloths shall be stored in enclosed containers after use until they are removed for disposal. Cleaning solvents shall be dispensed by a piston type dispenser or similar contained device when used on wipes.
- 5.13 All extraction ducting serving the chimney and flues shall be maintained in a gastight condition. Regular inspections shall be made to the ducting to ensure this.
- 5.14 The raw materials used in the Installation and all waste materials produced from the Installation shall be delivered, stored and handled with care to prevent or reduce to an absolute minimum any emissions of particulate matter to air.
- 5.15 There shall be a review of cleaning operations which involve organic solvents within 6 months of the issue of this Permit and every 2 years thereafter to identify opportunities to reduce the emissions of Volatile organic solvents. A report shall be provided to the Council.

6.0 GENERAL CONDITIONS

- 6.1 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. A

written maintenance programme shall be produced with regard to pollution control equipment in accordance with condition 7.1.

- 6.2 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. Particular emphasis shall be given to training for start-up and shut-down and action required to minimise emissions during abnormal conditions. A record shall be maintained of all relevant training provided to staff in accordance with condition 7.1.
- 6.3 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 Council immediately, and a record shall be made of the incident in accordance with condition 7.1.

7.0 RECORDS

- 7.1 The Operator shall ensure that all records required to be made by this Permit and other records made by it in relation to the operation of the Installation shall:
- (a) be made available for inspection by the Council at any reasonable time;
 - (b) be supplied to the Council on demand and without charge;
 - (c) be legible;
 - (d) be made as soon as reasonably practicable;
 - (e) indicate any amendments which have been made and shall include the original record wherever possible; and
 - (f) be retained at the Installation, or other location agreed by the Council in writing, for a minimum period of 4 years from the date when the records were made, unless otherwise agreed in writing

APPENDIX 2 – SOLVENT MANAGEMENT PLAN CALCULATION OF ANNUAL CONSUMPTION OF ORGANIC SOLVENT

The Solvent Management Plan provides a methodology to calculate the “Annual Consumption of Organic Solvent” (C). The information detailed below shall be compiled for each accounting period and submitted to the Council in accordance with the relevant Permit condition.

The steps to be followed for this calculation are shown in 1 to 4 in the box below. The information contained in the box has been extracted from the relevant process guidance note. In order to ensure consistency the various “I” and “O” parameters listed in the box have been assigned the same numbers as those assigned to the same parameters in the “Secretary of State’s Process Guidance Note”.

Determination of Solvent Consumption

The following steps should be followed:

- (1) Record the following details:
 - (a) the mass of solvent contained in raw materials and preparations in the initial stock (**IS**) at the start of the accounting period, plus;
 - (b) the mass of solvent contained in raw materials and preparations in the purchased stock (**PS**) during the accounting period;
 - (c) the mass of solvent contained in raw materials and preparations in the final stock (**FS**) at the end of the accounting period.

- (2) Calculate the total organic solvent input using the formula $I_1 = IS + PS - FS$

- (3) Calculate and state the annual consumption of organic solvent (C) using the following:

$$C = I_1 - O_8$$

Where: I_1 = Total quantity of organic solvents or their quantity in preparations purchased which are used as input into the process/activity.

O_8 = Organic solvents contained in preparations recovered for reuse but not as input into the process/activity.

- (4) From the calculation of total organic solvent input in (2) above, determine whether any of the products, substances or preparations are designated assigned or needs to carry the risk phrases R40, R45, R46, R49, R60 or R61. If any such materials are identified their individual product description, risk phrase designation, quantity (kilograms) and product use shall be detailed.

**Explanatory Note to Pollution Prevention and Control Permit
(This note does not form a part of the Permit)**

The enclosed Permit is issued under Regulation 10 of the Pollution Prevention and Control (England and Wales) Regulations 2000 (S.I. 2000 No.1973), as amended, ("the PPC Regulations") to operate an Installation carrying out activities covered by the description in Section 2.1, Part A(2) (c) of Schedule 1 of the PPC Regulations, to the extent authorised by the Permit:

Aspects of the operation of the Installation which are not regulated by conditions of the Permit are subject to the condition implied by Regulation 12(10) of the PPC Regulations, i.e. the Operator shall use the best available techniques for preventing or, where that is not practicable, 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.

In some sections of the Permit conditions require the Operator to use Best Available Techniques (BAT), in each of the aspects of the management of the Installation, to prevent and where that is not practicable to reduce emissions. The conditions do not explain what is BAT. In determining BAT, the operator should pay particular attention to relevant sections of the Secretary of State's Guidance and other relevant guidance.

Process Changes

Under the provisions of regulation 16 of the PPC Regulations, you are required to notify the Council of any proposed change in operation at least 14 days before making the change. This must be in writing and must contain a full description of the proposed change in operation and the likely consequences. Failure to do so is an offence.

If you consider that a proposed change could result in the breach of the existing Permit conditions or is likely to require the variation of Permit conditions then you may apply in writing under Regulation 17(2) of the PPC Regulations. Additionally, if this involves a SUBSTANTIAL CHANGE to the Installation you will be required to submit an application, pay the relevant fee and advertise the application accordingly.

Variations to the Permit

The Permit may be varied in the future (by the Council serving a Variation Notice on the Operator). If the Operator itself wants any of the Conditions of the Permit to be changed, it must submit a formal Application. The Status Log within the Introductory Note to any such Variation Notice will include summary details of this Permit, variations issued up to that point in time and state whether a consolidated version of the Permit has been issued.

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 Council 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.

Annual Subsistence Fee

In accordance with Regulation 22(2)(c) of the PPC Regulations, the holder of a Permit is required to pay a fee for the subsistence of the Permit. This fee is payable annually on 1st April. You are advised that under the provisions of Regulation 21 of the PPC Regulations, if you fail to pay the fee due promptly, the Council may revoke the Permit. You will be contacted separately each year in respect to this payment.

Public Register

The Council is required by Regulation 29 of the PPC Regulations to maintain a Public Register containing information on all LAPPC Installations and mobile plant. The register is available for inspection by the public free of charge during office hours (Monday to Friday 9.00am to 5.00pm) at:

**Dudley Metropolitan Borough Council,
Directorate of the Urban Environment,
Claughton House,
Blowers Green Road,
Dudley
DY2 8UZ**

Confidentiality

The Council has a duty to consider the question of confidentiality of information supplied to it. If any information supplied is considered confidential, a statement of which information this applies to and the reasons why should be specified. The Operator is reminded that he may apply to the Council for the exclusion of information from the public register under the provisions of the Pollution Prevention and Control Act 1999.

Talking to Us

Any communication with the Council with respect to this Permit should quote the Permit Reference Number, and should be made to:

**Dudley Metropolitan Borough Council,
Directorate of the Urban Environment,
Claughton House,
Blowers Green Road,
Dudley
DY2 8UZ**

Telephone: 01384 818181
Fax: 01384 814627

Appeals

Under Regulation 27(1)(c) of the PPC Regulations operators have the right of appeal against the conditions attached to their Permit.

Appeals against a Variation Notice do not have the effect of suspending the operation of the Notice. Appeals do not have the effect of suspending Permit conditions.

Notice of appeal against the conditions attached to the Permit must be given within six months of the issue date of the Notice, which is the subject matter of the appeal.

How to Appeal

There are no forms or charges for appealing. However, for an appeal to be valid, appellants (the person/operator making the appeal) are legally required to provide:

- written notice of the appeal;
- a statement of the grounds of appeal;
- a statement indicating whether the appellant wishes the appeal to be dealt with by written representations procedure or a hearing - a hearing must be held if either the appellant or enforcing authority requests this, or if the Planning Inspector or the Secretary of State decides to hold one.
- (appellants must copy the above three items to the local authority when the appeal is made)
- a copy of any relevant application;
- a copy of any relevant Permit;
- a copy of any relevant correspondence between the appellant and the regulator; and
- a copy of any decision or notice, which is the subject matter of the appeal.

Where to Send Your Appeal Documents

Appeals should be addressed to:

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

In the course of an Appeal process the main parties will be informed of procedural steps by the Planning Inspectorate.

To withdraw an appeal the appellant must notify the Planning Inspectorate in writing and copy the notification to the local authority.

