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Hereby Permit

BODYKRAFT DUDLEY LTD
BUILDING 28
FIRST AVENUE
PENSNETT TRADING ESTATE

To Operate A Part B Installation At

The above address

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/61

Date Initial Permit Issued

27th June 2005

A handwritten signature in cursive script, appearing to read "T. Glews".

Dated: 27th June 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 Bodykraft Dudley Ltd., Building 28, First Avenue, Pensnett Trading Estate, Pensnett.

DESCRIPTION OF INSTALLATION

The installation uses in excess of ½ tonne of solvents per annum in the coatings applied to vehicles. The coating process is undertaken in the Burntwood Excell Combined Plant Booths and Curing ovens. The spraying process uses High Pressure Low Volume (HVLV) spray guns and the vehicle remains in the booth for the curing process.

Spray gun cleaning is undertaken in the paint mixing room, and the gun cleaners are served by extraction.

This installation falls within the definition of Part B 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/61" shows the designated site.

STATUS LOG

Detail	Reference	Date
Deemed Application Made	PB/61	1 st April 2004
Permit Issued	PB/61	27 th June 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- Solvents Emissions Installation	Coating motor vehicles using greater than 0.5 tonnes of solvent in any 12 month period
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 authorised under condition 1.1 shall not extend beyond the site, being the area shown hatched on the Site Plan PB/61 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 The maximum content of organic solvents (in grammes per litre) which may be present in the coatings as applied shall not exceed the amount given in Table 2.2.

Table 2.2	
Maximum Permissible Solvent Content of Coatings	
Coating Category	grammes of VOC/litre of coating (less water)
Gun Wash	850
Pre-cleaner	200
Wash primer (a)	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 August 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 Any halogenated volatile organic compounds carrying any of the risk phrases R45, R46, R49, R60, R61, shall be substituted within the ‘shortest possible time’, and in accordance with a timetable which shall be agreed in writing with the Council. The term ‘risk phrase’ shall have the same meaning as in the Chemicals (Hazard Information and Packaging for Supply) Regulations 1994.
- 3.3 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. Substances or preparations already in use shall be replaced with non-designated substances in accordance with a scheme to be submitted to the regulator within 3 months of issue of this permit.

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

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 and these shall be checked at the start of each spray job to ensure that the booths are not under positive pressure. The inter-locking device on the booth shall be checked at least every 6 months to ensure it is functioning correctly.
- 5.4 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.
- 5.5 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.

- 5.6 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.
- 5.7 The Operator shall, by 1st August 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.
- 5.8 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.
- 5.9 All spray gun cleaning and associated equipment shall take place in a totally enclosed gun-cleaning machine.
- 5.10 Spray gun testing and spray-out shall take place into the designated gun-cleaning machine with the extraction system operating.
- 5.11 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.
- 5.12 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.
- 5.13 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.
- 5.14 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 The external surfaces of the Installation building(s), ancillary plant and open yards and storage areas shall be thoroughly cleaned on an annual basis or more frequently, if necessary, to prevent accumulations of dusty materials which may be the source of airborne particulate matter.

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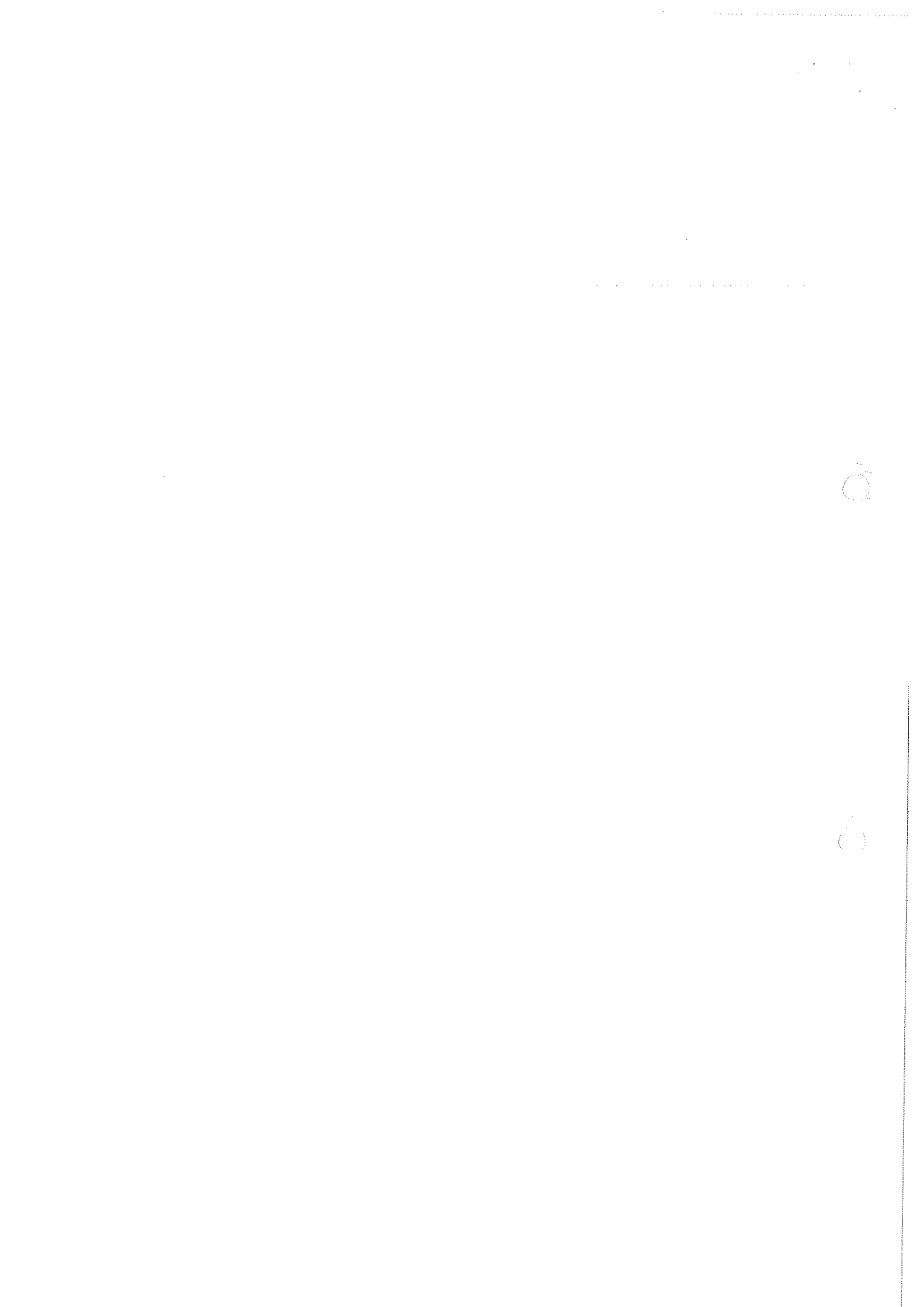
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- 6.4 Any malfunction which results in emissions to atmosphere which are likely to cause an adverse effect on the local community shall be reported to the Council immediately, and a record shall be made of the incident in accordance with condition 7.1.

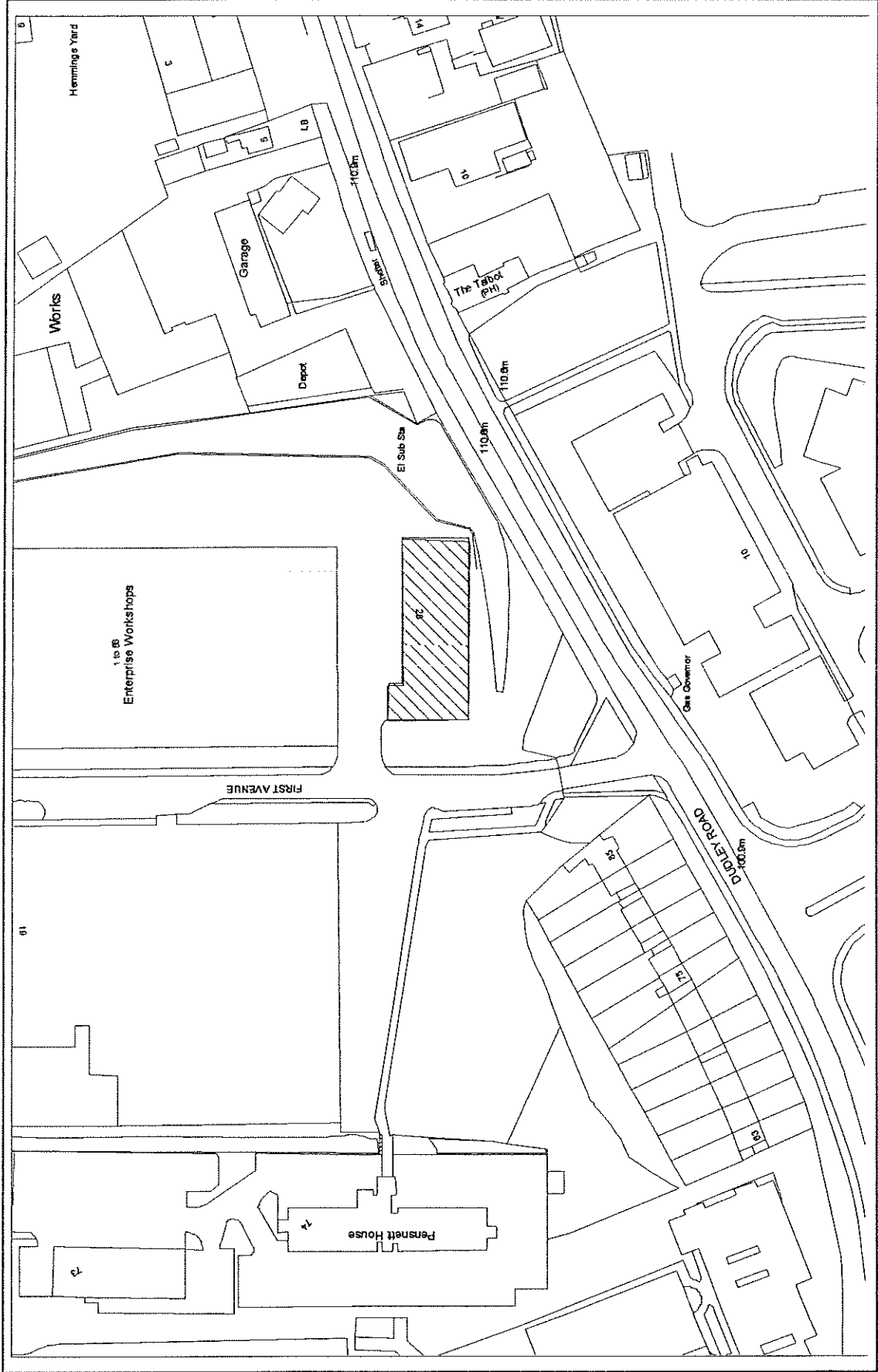
7.0 RECORDS

- 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
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**Appendix 1 – Site Location Plan PB/61
Bodykraft Dudley Limited – Pensnett Trading Estate**





**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.

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**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 4 weeks 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

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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.

Council House, Mary Stevens Park, Stourbridge, DY8 2AA Minicom: (01384) 814686
Telephone: Dudley (01384) 818181 Fax: (01384) 814455

Your ref: Our ref: **Bodykraft Dudley Limited** Please ask for: Ext.
Direct Line: (01384)

AUTHORISATION TO OPERATE A PRESCRIBED PROCESS

The Environmental Protection Act 1990, Part 1

The Environmental Protection (Prescribed Processes and Substances)
Regulations (As Amended) 1991

The Environmental Protection (Applications, Appeals and Registers)
Regulations (As Amended) 1991

The Environmental Protection (Prescribed Processes and Substances etc)
(Amendment) Regulations 1994

Application Duly Made: 25th November 1999

Authorisation Reference Number: B3/81

Date Authorisation Served:

2nd May 2000

DATE VARIATION NOTICE SERVED:

Dudley M.B.C. do hereby authorise Bodykraft Dudley Limited,

Building 28, First Avenue, The Pensnett Estate, Kingswinford, West Midlands.
DY6 7PP

to carry on a Coating Process as described below in accordance with the
following conditions.

ADDRESS OF AUTHORISED PROCESS

Building 28, First Avenue, The Pensnett Estate, Kingswinford, West Midlands.
DY6 7PP

DESCRIPTION OF AUTHORISED PROCESS

The vehicle re-finishing process consists of the repair and painting of part
or the whole body of passenger cars. In excess of 3 tonnes of Volatile
Organic Compounds including isocyanates are used in the prescribed process in
any 12 month period. The re-finishing products are delivered to the site of
the prescribed process in sealed containers which are stored within a
designated area within the workshop.

Council House, Mary Stevens Park, Stourbridge, DY8 2AA

Minicom: (01384) 814686

Telephone: Dudley (01384) 818181

Fax: (01384) 814455

Your ref:

Our ref: **Bodykraft Dudley** Please ask for:

Ext.

Limited

Direct Line: (01384)

When the damaged vehicles arrive on site the damaged mechanical and body parts are removed from the vehicle. Mechanical repairs are carried out where necessary, damaged body parts are then either repaired or replaced. The repair of damaged and the fitting of body panels can cause emissions of dust and fumes from grinding, sanding and welding operations which take place in the workshop. These emissions are contained within the workshop building.

Once repairs are completed vehicles are prepared for painting. This involves masking parts, which do not need to be painted, with paper/plastic tape. The vehicles are then moved into spray booths to be painted. There are two Burntwood Excell Combined Paint Booths and Curing Ovens. Air entering these booths pass through fabric panel air filters to prevent the entry of dust. Extracted air from the booths passes through grilles in the floor under which dry filters are fitted to remove the paint particulate overspray. The extracted air is discharged to atmosphere via a 8 metre high stacks (3 metres above ridge height) at a minimum exhaust velocity of 15 metres per second. The booths are capable of extracting air at rate of 8,500 cm³/hour.

Paint is mixed in a mixing room which is equipped with low level local exhaust ventilation. Extracted air is discharged to atmosphere via a stack at a height of approximately 8 metres above ground level. Paint is applied using conventional spray guns. The compressed air for the spray guns is supplied to the spray guns by an electrically driven compressor.

The paint is cured in the Burntwood Excell Combined Paint Booths and Curing Ovens. The cure cycles normally last for approximately 40 minutes and the air temperatures within the booths are approximately 80°C. The air entering the booths is heated indirectly by the use of natural gas burners. The products of combustion are extracted and exhausted to atmosphere via chimney stacks which terminate at approximately 8 metres above ground level.

Spray gun cleaning is undertaken in the paint mixing room. The spray guns are dismantled prior to cleaning and the component parts loaded into an automatic gun cleaning machine. The door of the machine is closed and the parts are then cleaned in a solvent which is pumped from a drum held under the machine. The solvent then drains back into the drum and is re-circulated. When the gunwash solvent in the drum is too contaminated to be used again the drum is lidded and replaced. A small quantity of clean solvent is then sprayed from the gun into a drum of waste solvent to rinse it. The contaminated gunwash solvent is returned to an authorised disposal agent for reclamation. The gun cleaning machine is extracted to atmosphere via ducting which terminates at approximately 8 metres above ground level.

This process is prescribed in Part 'B', "Coating Processes" of Schedule 1 of SI 472 : 1991. The attached location plan (Marked P1) details the designated site of this prescribed process and the attached layout plan (Marked P2) detail the layout of this prescribed process.

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Telephone: Dudley (01384) 818181 Fax: (01384) 814455

Your ref: Our ref: **Bodykraft Dudley Limited** Please ask for: Ext.
Direct Line: (01384)

1.0 CONDITIONS

- 1.1 This authorisation is issued on the understanding that the prescribed process being carried on at this site is operated in such a manner that it complies with the provision of the following legislation:-
- i. Clean Air Act 1993 (as amended) and the statutory nuisance provisions of Part III of the Environmental Protection Act 1990.
 - ii. Health and Safety at Work etc. Act 1974.
- 1.2 The requirements of this authorisation shall be effective from the date of service, unless otherwise specified. 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 a condition.

2.0 EMISSION LIMITS AND CONTROLS

- 2.1 All emissions to air from the prescribed process other than steam or condensed water vapour, shall be colourless while the process is operating normally and free from persistent mist. All emissions to air from the prescribed processes shall be free from persistent fume and free from droplets.
- 2.2 Emissions from the chimney stacks exhausting the products of combustion from the burners serving the Burntwood Excell Combined Paint Booths and Curing Ovens shall, in normal operation, be free from visible smoke, except for the first minute of start up, when the emission shall not exceed the equivalent of Ringelmann Shade 1, as described in British Standard BS:2742:1969.
- 2.3 The introduction of dilution air to reduce the concentration of substances in emissions to atmosphere is not permitted, except in circumstances where emission levels are being met or do not apply, dilution air may then be permitted to render harmless a visible or odorous emission upon approval by Dudley Metropolitan Borough Council, Environment, Engineering and Transportation Department. Exhaust flow rates shall be consistent with the efficient capture of emissions and good operating practices.
- 2.4 All emissions from the prescribed process shall be free from offensive odours outside the process boundary as perceived by an Officer of Dudley Metropolitan Borough Council, Environment, Engineering and Transportation Department.

Council House, Mary Stevens Park, Stourbridge, DY8 2AA

Minicom: (01384) 814686

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Your ref:

Our ref: **Bodykraft Dudley Limited**

Please ask for:
Direct Line: (01384)

Ext.

- 2.5 The concentration of total particulate matter in the final discharge to air from the chimney stack exhausting the paint spraying process in the Burntwood Excell Combined Paint Booths and Curing Ovens shall not exceed 10mg/m³.
- 2.6 The maximum content of organic solvents, (in grammes per litre), which may be present in the coatings as applied shall not exceed the amounts specified in the table below.

Gun Wash	850
Pre-cleaner	200
Wash primer (a)	780
Pre-coat	250
Primer surfacer	250
Non-Sand surfacer	250

Primers for wet-on-wet top coat applications (b) 250 or 540

Top Coats:

1-coat conventional	420
2-coat base and clear (c)	420
3-coat topcoat systems	420

Special products (d) 840

(a) to (d) above denote Notes that are applicable to this Condition. These Notes are detailed in Additional Note 3 which is attached to this Authorisation.

3.0 MONITORING, SAMPLING AND MEASUREMENT OF EMISSIONS

- 3.1 The chimney exhausting the Burntwood Excell Combined Paint Booths and Curing Ovens shall be observed for any visible emissions to air once per day/shift, and on the occasion of starting up the process, during the hours of daylight and when the process is operating to full capacity, 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. A record of all observations shall be entered into the logbook required to be kept in accordance with Condition 3.3. The records shall include an assessment of the nature and severity of any emission observed and where appropriate a comparison to the Ringelmann scale of obscuration as described by British Standard BS 2742:1969.

If excessive emissions are observed, 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 emissions to air caused by the malfunction. Dudley Metropolitan Borough Council, Environment, Engineering and Transportation Department shall be notified of any such occurrence as soon as practicable.

3.2 A daily assessment shall be made for odour emissions from the prescribed process while the process is operating at full capacity. The assessment shall be made at a point on the process 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 3.3. The records shall include a subjective assessment of the nature and severity of any odour detected.

3.3 A logbook shall be established and maintained which contains a record of all visual and olfactory observations made in accordance with condition numbers 3.1 and 3.2. 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 Dudley Metropolitan Borough Council, Environment, Engineering and Transportation Department at the premises occupied by the process, and the records shall be retained for at least four years.

If excessive 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. Dudley Metropolitan Borough Council, Environment, Engineering and Transportation Department shall be notified of any such occurrence as soon as practicable.

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- 3.4 All paint spraying shall be carried out in totally enclosed booths with the extraction systems operating, thereby minimising fugitive emissions of odour and particulate matter to atmosphere.
- 3.5 The particulate matter capture and filtration system provided in the workshop shall be used at all times to collect and contain emissions from operations which are likely to produce particulate matter and fumes.
- 3.6 Coatings 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%.
- 3.7 The Burntwood Excell Combined Paint Booths and Curing Ovens shall have their pressure gauges 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 the log book required by Condition 3.3, and shall be investigated and the necessary remedial action taken to resolve the issue.
- 3.8 The Burntwood Excell Combined Paint Booths and Curing Ovens shall be fitted with booth extraction shut-down systems linked to audible and visual alarms to prevent spraying operations from continuing in the event of positive pressure within the booths. The automatic shut down-systems and alarms shall be tested at least once every 6 months and maintained in sound working conditions.
- 3.9 A detailed record shall be kept of all substances used which contain organic solvents. The record shall be kept in such a way that the total organic solvent usage can be determined and this determination shall be made at 6 monthly intervals and the data submitted to Dudley Metropolitan Borough Council's Environment, Engineering and Transportation Department within 6 weeks of the determination.
- 4.0 PROCESS CONTROLS**
- 4.1 Paint mixing and equipment cleaning using the using the gun cleaning machine shall only be carried out in the designated paint mixing room which is provided with extract ventilation.
- 4.2 All spray gun cleaning and associated equipment shall take place in the designated totally enclosed gun cleaning machine.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. This is particularly crucial for businesses that operate in highly competitive markets where every dollar counts.

2. The second part of the document details the various methods used to collect and analyze data. These methods include both traditional statistical techniques and more modern data mining algorithms.

3. The third part of the document focuses on the application of these data analysis techniques to real-world business scenarios. It provides several case studies that illustrate the effectiveness of these methods.

4. The fourth part of the document discusses the challenges associated with data analysis, such as data quality issues and the need for skilled personnel to interpret the results.

5. The fifth part of the document concludes by emphasizing the importance of ongoing education and training in the field of data analysis to stay current with the latest developments.

6. The sixth part of the document provides a list of references for further reading on the topics discussed in the report.

7. The seventh part of the document contains a summary of the key findings and recommendations.

8. The eighth part of the document discusses the implications of the findings for future research and practice.

9. The ninth part of the document provides a detailed explanation of the methodology used in the study.

10. The tenth part of the document discusses the limitations of the study and the potential for future research.

11. The eleventh part of the document contains a list of acknowledgments.

12. The twelfth part of the document provides contact information for the authors.

13. The thirteenth part of the document contains a list of appendices.

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- 4.3 Spray gun testing and sprayout shall take place into the designated gun cleaning machine with the extraction system operating.
- 4.4 All full, partially full and nominally empty containers which hold or have held materials or waste which contains organic solvents shall be stored tightly lidded at all times.
- 4.5 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 materials shall be removed by means of vacuum cleaning using an industrial grade vacuum cleaner or by wet cleaning methods, dry sweeping shall not be permitted. Any used absorbent material contaminated with substances containing solvents shall be stored in a closed container pending removal from site.
- 4.6 The wiping of surfaces with solvent for cleaning and de-greasing purposes shall only be carried out with within the Burntwood Excell Combined Paint Booths and Curing Ovens with their extract ventilation operating.
- 4.7 All solvent soaked wiping cloths shall be stored in enclosed containers after use until they are removed from site for disposal purposes.
- 4.8 All arisings of dry, dusty materials and used filters from the spray booths and dust collection systems shall be stored in sealed bags or closed containers within the waste materials skip while awaiting removal from the site of this prescribed process.
- 4.9 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.
- 4.10 The chimneys exhausting the Burntwood Excell Combined Paint Booths and Curing Ovens and the paint mixing room shall be retained at their present height above ground level. The chimneys shall not be fitted with any restrictive plate, cap or cowl at the final opening other than a cone to effect adequate efflux velocity. The discharge shall be vertically upwards.
- 4.11 A minimum discharge velocity shall be maintained from the chimneys exhausting the Burntwood Excell Combined Paint Booths and Curing Ovens and paint mixing room which prevents the discharge emission from being affected by aerodynamic downwash.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. This is essential for ensuring the integrity of the financial statements and for providing a clear audit trail. The records should be kept in a secure and accessible location, and should be updated regularly.

2. The second part of the document outlines the various methods used to collect and analyze data. This includes both qualitative and quantitative techniques, and should be tailored to the specific needs of the study. The data should be collected in a systematic and unbiased manner, and should be analyzed using appropriate statistical methods.

3. The third part of the document describes the results of the study. This includes a detailed description of the data, and a discussion of the findings. The results should be presented in a clear and concise manner, and should be supported by appropriate evidence. The findings should be discussed in the context of the research objectives, and should be compared with the results of other studies.

4. The final part of the document provides a conclusion and recommendations. This should summarize the main findings of the study, and should provide practical advice for future research. The recommendations should be based on the results of the study, and should be supported by appropriate evidence.

5. The first part of the document discusses the importance of maintaining accurate records of all transactions. This is essential for ensuring the integrity of the financial statements and for providing a clear audit trail. The records should be kept in a secure and accessible location, and should be updated regularly.

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- 4.12 All extraction ducting serving the chimney and flues shall be maintained in a gastight condition. Regular inspections shall be made to ensure that the ducting, chimney and flues are in a gastight condition, any necessary repairs shall be made immediately.

5.0 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. Essential spares and consumables shall be kept on site or shall be available at short notice from guaranteed suppliers.
- 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. Particular emphasis shall be given to training for start-up and shut-down and abnormal conditions. Records shall be kept which detail all relevant training provided to staff, the records shall be made available for inspection by an authorised officer from Dudley Metropolitan Borough Council, Environment, Engineering and Transportation Department. The records shall be retained for at least 4 years.
- 5.3 If there is any intention to change any aspect of the prescribed process from the description of the process at the beginning of this authorisation, or any other aspect which may affect the substances or concentration of substances being emitted to air, Dudley Metropolitan Borough Council, Environment, Engineering and Transportation Department shall be notified of the proposed changes at least 4 weeks before the changes take place.

1. $\frac{1}{x^2} = x^{-2}$

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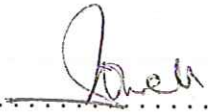
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5.4 Any malfunction or breakdown leading to emissions to atmosphere which are likely to cause an adverse effect on the local community shall be addressed promptly and the process adjusted until normal operation can be restored. All such malfunctions or breakdowns shall be reported to Dudley Metropolitan Borough Council's Environment, Engineering and Transportation Department immediately and recorded in the logbook required to be kept in accordance with condition 3.3 along with details of the action taken to rectify the situation.


..... (Signature)
Chief Environment, Engineering and Transportation Officer

Signed on:..... 2nd MAY 2000..... (date)

By, or on behalf of Dr M W Courtis, Chief Environment, Engineering and Transportation Officer, Dudley Environment, Engineering and Transportation Department, authorised by Dudley Metropolitan Borough Council to sign on their behalf.

ADDITIONAL NOTES

1. Section 7(10) of the Act describes "BATNEEC" as including, in addition to technical means and technology, the number, qualification, training and supervision of persons employed in the process and the design, construction, layout and maintenance of the buildings in which the process is carried on.
2. Section 7(4) of the Act provides that, in relation to any aspect of the prescribed process not regulated by Conditions 1.1 to 5.4, the Best Available Techniques Not Entailing Excessive Costs shall be used:-
 - a. For preventing the release of substances prescribed for air into the air or, where that is not practicable by such means for reducing the release into the air of such substances to a minimum and for rendering harmless any such substances which are so released, and
 - b. For rendering harmless any other substances which might cause harm if released into the air.

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3. The Notes below refer directly to those listed in Condition 2.6 of this Authorisation:

- (a) high solvent content wash primers should only be used where it is necessary to achieve adhesion of subsequent coats on difficult, bare metal, surfaces such as aluminium, zinc plated, or galvanised metals. The use of such wash primers should be limited to not more than 5% of the total coatings material usage except where etch primer is used to coat aluminium for the first time.
- (b) primers for wet-on-wet topcoat application should only be permitted to contain 540 g/l organic solvent where the topcoat to be subsequently applied is solvent/borne.
- (c) this is the combined value for the solvent content of the base coat or coats and the clearcoat and should be calculated as follow:-

for 2-coat base and clear topcoat systems:-

permissible solvent concentration
in coating as applied (g/l) = $\frac{S_1 + 2(S_2)}{3}$

- S1 is the solvent content, as applied, of the basecoat and S2 is the solvent content, as applied, of the clearcoat in each case.

for 3-coat base and clear systems

permissible solvent content in coating as applied (g/l) =

$$\frac{S_b + S_g + 2(S_c)}{4}$$

where -

Sb is the organic solvent content of the basecoat/intermediate colour, Sg is the organic solvent content of the ground coat/base colour, and Sc is the organic solvent content of the clearcoat, as applied, in each case.

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- (d) (i) where a special product is supplied by the manufacturer or distributor the limit shown in Clause 32 relates to the coating, as applied
- (ii) where a special product is prepared from the mixing of an additive and a standard product, the permitted solvent content, as applied, will comply with the limit in Clause 32. The permitted solvent content is determined as follows:

Permitted solvent concentration = $\frac{(M \times S3) + (N \times S4) + (P \times S5)}{100}$ g/l less water in the coating as applied

M is the percentage of the additive, less any water present in the additive, in the coating as applied

S3 is the organic solvent content of the additive (g/l less water)

N is the percentage of the standard product, less any water present in the product, in the coating as applied

S4 is the permissible solvent content of the standard product (see Clause 32)

P is the percentage of added thinners, less any water present in the thinners, in the coating as applied

S5 is the solvent content of the thinners

4. To contact this office, during normal office hours, telephone Dudley 818181, and ask to speak to an officer in the Environmental Protection Division of the Environment, Engineering and Transportation Department.

To report an incident to this Department during out of office hours, the emergency operator should be contacted on Dudley 818182.

5. 'Colourless' for the purposes of this authorisation, is defined as not including white, grey and black emissions, as stated in the Secretary of State's Guidance Note, GG4(91).
6. Dudley Metropolitan Borough Council, Environment, Engineering and Transportation Department encourages the collection and recycling of all dirty solvents and other liquid wastes which contain volatile organic compounds and to retain copies of receipts for such recycled materials for a minimum of three years.

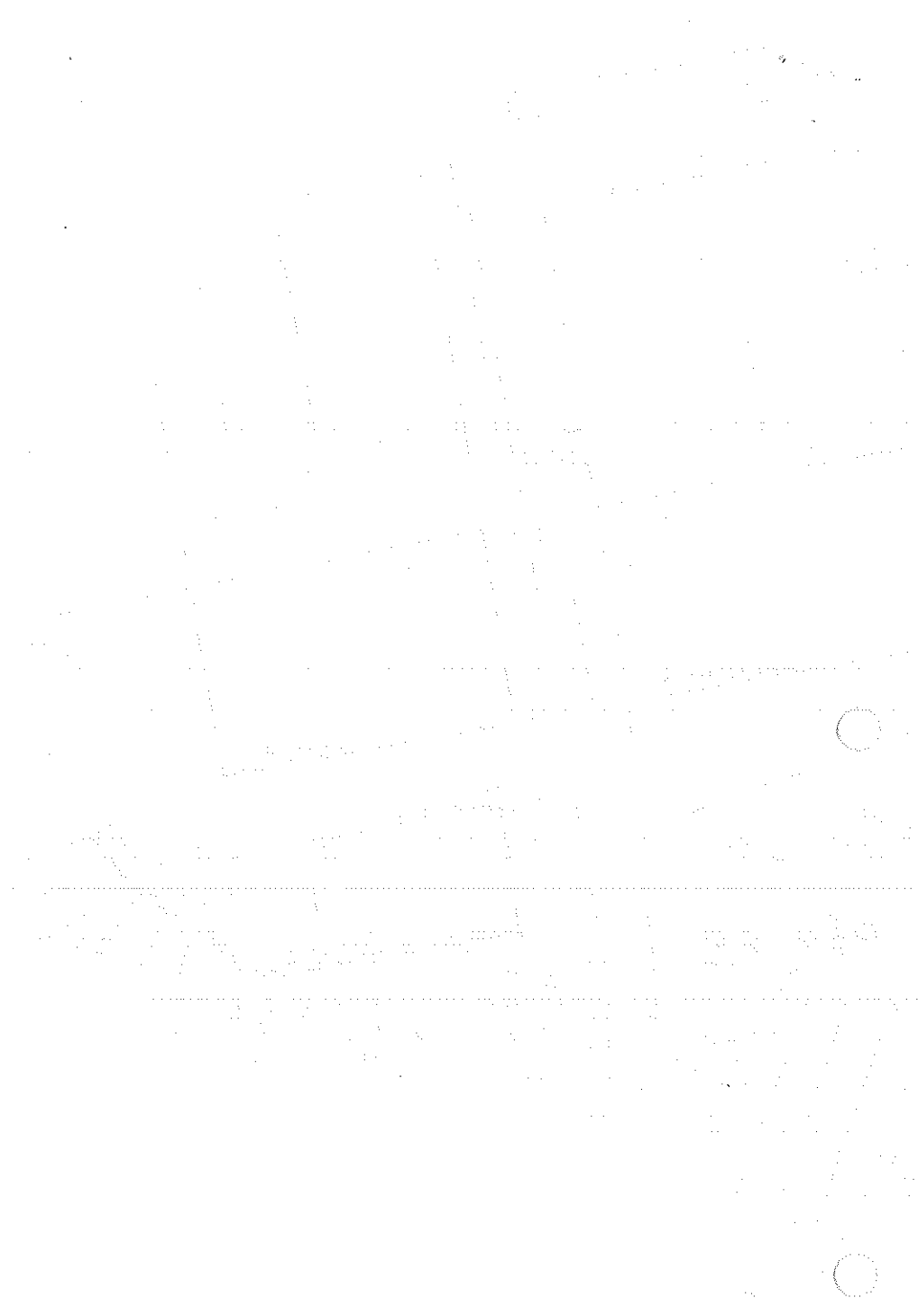


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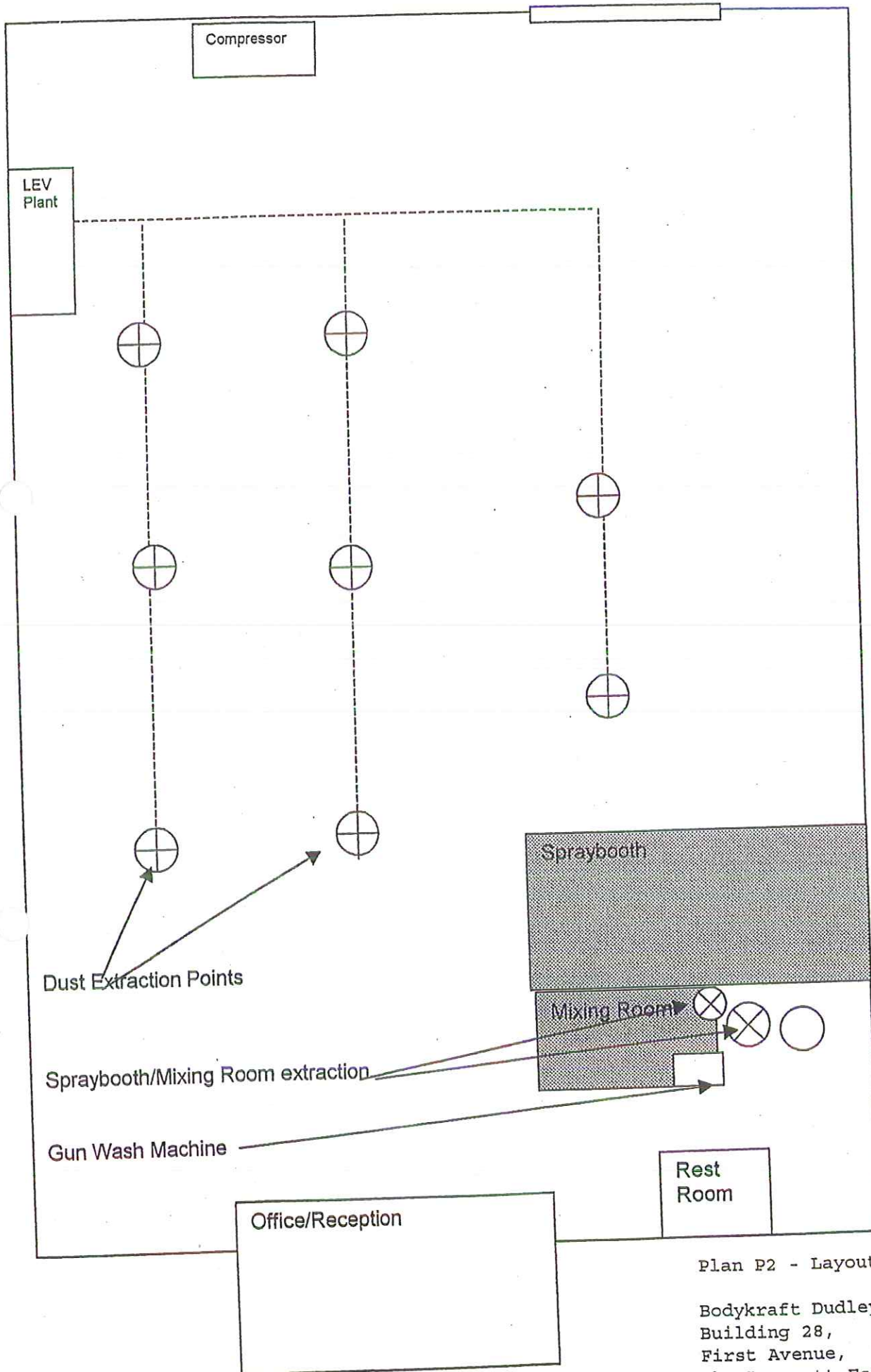
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Plan P1 - Location Plan

Bodykraft Dudley Limited,
 Building 28,
 First Avenue,
 The Pensnett Estate,
 Kingswinford,
 West Midlands.
 DY6 7PP



BodyKraft Dudley Ltd - Layout Plan
Not to Scale



Plan P2 - Layout Plan
Bodykraft Dudley Limited,
Building 28,
First Avenue,
The Pensnett Estate,
Kingswinford,
West Midlands.
DY6 7PP

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