

EP Permit ref: WYC/PPC/32/1/04
Variation ref: WYC/PPC/32/1/04/V2

WYCHAVON DISTRICT COUNCIL

Pollution Prevention and Control Act 1999

The Environmental Permitting (England and Wales) Regulations 2016, Regulation 20 and Regulation 18

Variation Notice

To Roger Dyson Ltd, Foundry House, Long Bank, Berry Hill Industrial Estate, Droitwich, Worcestershire, WR9 9AN

Wychavon District Council ("the Council") , in the exercise of the powers conferred upon it by regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016¹ ("the 2016 Regulations") hereby gives you notice as follows-

The Council has decided to vary the conditions of permit reference WYC/PPC/32/1/04 granted under regulation 13(1) of the 2016 Regulations in respect of the operation of the installation at Foundry House, Long Bank, Berry Hill Industrial Estate, Droitwich, Worcestershire, WR9 9AN

The variation of the conditions of the permit and the date on which they are to take effect are specified in Schedule 1 to this notice. A consolidated permit as varied by this notice and by variation notices ref WYC/PPC/32/1/04/V2 is set out in Schedule 2.

Signed on behalf of Wychavon District Council



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Date 13/07/2020

Toni Ainscough
Environmental Health Officer
Worcestershire Regulatory Services
An authorised officer of the Council

EP Permit ref: WYC/PPC/32/1/04
Variation ref: WYC/PPC/32/1/04/V2

Schedule 1

Variation to the conditions of the permit	Date(s) on which the variation is to take place
CONDITIONS TO BE DELETED 1 to 43	13/07/2020
CONDITIONS TO BE ADDED 1 to 39	13/07/2020

Signed on behalf of Wychavon District Council



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Date 13/07/2020

Toni Ainscough
Environmental Health Officer
Worcestershire Regulatory Services
An authorised officer of the Council

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Schedule 2

Permit reference WYC/PPC/32/1/04 as varied by this notice.

WYCHAVON DISTRICT COUNCIL

The Environmental Permitting Regulations (England and Wales) Regulations 2016

Permit Reference	WYC/PPC/32/1/04
Instillation Address:	Roger Dyson Ltd, (B) Foundry House, Long Bank, Berry Hill Industrial Estate, Droitwich, Worcestershire, WR9 9AN
Operators Registered Address:	Roger Dyson Ltd (A) Foundry House, Long Bank, Berry Hill Industrial Estate, Droitwich, Worcestershire, WR9 9AN
Regulators Address:	Wychavon District Council Civic Centre Queen Elizabeth Drive Persnore Worcestershire WR10 1PT
Correspondence Address:	Worcestershire Regulatory Services Wyre Forest House Finepoint Way Kidderminster Worcestershire DY11 7WF

Wychavon District Council hereby permit Roger Dyson Ltd in accordance with the following conditions numbered 1 to 39 inclusive to carry out the respraying of road vehicles and the original coating of road vehicles and trailers as prescribed in Section 4.6 Part B of Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2016 at the instillation address stated and as outlined in red on the attached figure 1.

Activity description

The activity involves the coating of road vehicles involving the surface preparation, and subsequent painting or repainting of vehicles, and vehicle components.

This involves:-

Preparation of the vehicle before coating

The shot blasting of metal components in the recycling shot blast unit in the building as shown on figure 3 drawing MT0016 A.

The particulate matter from the shotblast unit is extracted via an Airblast pulsed air unit that discharges cleaned air back into the building and not the external atmosphere.

The coating of small vehicle components in spraying area that discharges to air from chimney referenced S3 on the attached figure 2.

The coating of vehicles in one of three Burntwood spray and bake booths that discharge to air from chimneys referenced S4, S7 and S8 on the attached figure 2 and 3.

The cleaning of spray guns and other equipment in a Drester 3500 recirculating gun cleaning unit located in the paint and solvent storage area shown on the attached figure 2, that discharges to air from chimney referenced S7 on the attached figure 3.

The gas fired heater used to heat the air for the Burntwood spray bake booth, discharges to air through chimneys referenced S4, S9 and S12 on the attached figure 3.

Particulate matter generated during vehicle preparation is extracted via localised extraction points to a Mindon centralised dust extraction system.

Finishing of the vehicle

The operator **(A)** is authorised to operate the activity described above at installation **(B)** subject to the following conditions.

Non-VOC emissions

1.The following non-VOC emission limits shall apply:

Row		Source	Emission limits / provisions	Type of Monitoring	Monitoring frequency
1	Particulate matter	From spray booths	10 mg /Nm ³	By guarantee supplied by the spray booth constructor	None required
2	Isocyanates	All process/ activities	0.1mg/Nm ³ as a 15-minute mean for contained sources excluding particulate and expressed as NCO.	Manual extractive Testing	Annual

All emissions shall be determined at the standard reference conditions of 273.1K and 101.3kPa, without correction for water vapour content.

- 2.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.
- 3.The operator shall ensure that relevant stacks or ducts are fitted with facilities for sampling which allow compliance with the sampling standards.
- 4.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.
5. Flues and ductwork shall be cleaned to prevent accumulation of materials, as part of the routine maintenance programme.
6. Dusty wastes shall be stored in closed containers.
7. Dry sweeping of dusts and dusty wastes shall not be used.

8. The operator shall keep records of inspections, tests and monitoring in relation to the provisions of the table above. Current records shall be kept on site and made available for the regulator to examine for at least two years.
9. Within 8 weeks of the completion of monitoring activities, the results of non-continuous emission testing shall be forwarded to the regulator.
10. 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 obtained/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
11. In the case of abnormal emissions, or malfunction or breakdown leading to abnormal emissions, the operator shall:
 - investigate immediately and undertake corrective action
 - adjust the process or activity to minimise those emissions and
 - promptly record the events and actions taken
 - notify the regulator without delay, if the emission is likely to have an effect on the local community

The Solvent Reduction Scheme

12. The requirements of the 'Reduction Scheme' must be complied with.

To achieve compliance with the Reduction Scheme the operator shall demonstrate, annually, by calculation that the mass emission of VOC to atmosphere is less than or equal to the 'Target Emission'. The Target Emission being the mass of all solid coating materials multiplied by a factor to give the maximum allowable VOC emission as shown in Table 1.

Table 1

Solvent Consumption per Annum	Target Emission all Existing Installations from 31/10/2007
Greater than 0.5 tonnes	Total Mass of Solids x 1.2

Determination of Solvent Consumption

13. The operator shall construct an inventory of solvent use within the installation. This shall be used to determine the actual emissions annually in order to comply with condition 12.

The inventory shall be carried out by recording:

- The mass of organic solvent contained in coatings, diluents and cleaners in the initial stock (IS) at the start of the accounting period; plus
- The mass of organic solvent contained in coatings, diluents and cleaners in the purchased stock (PS) during the accounting period.
- Minus the mass of organic solvent contained in coatings, diluents and cleaners in the final stock (FS) at the end of the accounting period.

$$\text{Total Organic Solvent Input (I}_1\text{)} = \text{IS} + \text{PS} - \text{FS}$$

The inventory shall specifically and separately identify any VOC carrying any R-Phrases.

Having calculated total solvent input (I_1), the operator shall then calculate solvent consumption by subtracting from the input figures any solvent that is sent out for recovery.

$$\text{Hence: } C \text{ (consumption)} = I_1 - O_8 \text{ (recovered solvent)}$$

The inventory and consumption data shall be submitted to the regulator for the previous financial year annually. Data shall be provided to the regulator on or before the 31st January each year.

14. Surface preparation and painting operations shall be carried out using only coating materials, which are placed on the market for use in vehicle refinishing bodyshop (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 products that are covered by this permit are listed in Appendix 3 of Process Guidance Note 6/34(11)

15. The products used in coating shall be prepared and applied in accordance with the supplier's 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 4.2 of Process Guidance Note 6/34 (11).

16. All paint spraying operations shall be carried out in a totally enclosed booth under negative pressure, to prevent fugitive emissions of VOCs and particulate matter.
17. Spray applied coatings shall be applied using high volume low pressure (HVLP) (maximum atomisation pressure 67.5kPa) spraying equipment
18. All spray guns and equipment cleaning shall be carried out in an automatic, totally-enclosed equipment cleaning machine or any other equipment cleaning machine which can achieve comparable or lower emissions. The cleaning machine shall be provided with the minimum of exhaust ventilation that is necessary to prevent the fugitive emission of organic solvent vapour when the machine is opened for introduction or removal of equipment, or for the changing of cleaning solvent.
19. All spray gun testing and sprayout 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. A receptacle should be provided to collect the organic solvent which is put through the spraygun. When not in use, the receptacle should be kept lidded to prevent evaporation and fugitive emissions of organic solvent vapour.
20. Cleaning solvents shall be dispensed by a piston type dispenser or similar contained device when used on wipes.
21. Pre-impregnated solvent wipes shall be held within an enclosed container prior to use.
22. Organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas.
23. 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 and within spillage collectors, of suitable impervious and corrosion-proof materials and capable of containing 110% of the largest container and away from sources of heat.
24. 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.
25. Cleaning operations involving organic solvents shall be reviewed every two years, to identify opportunities for reducing VOC emissions. This will include identification of cleaning steps that can be eliminated or alternative cleaning methods. The regulator shall

be provided with a report on the conclusions of the review, within eight weeks of it being completed.

26. Spares and consumables, particularly those subject to continual wear shall be held on site, or shall be available at short notice from guaranteed suppliers, so that spraybooth and vacuum plant breakdowns can be rectified rapidly.

27. Waste solvents and waste coatings shall be recycled on or off-site. Copies of receipts of waste materials sold for recycling shall be kept for three years.

28. The operator shall ensure that volatile organic compounds with designated Risk Phrase R45, R46, R49, R60 and R61 until 1 June 2015 and from 1 December 2010 designated hazard statement H340, H350, H350i, H360D and H360F are not used in the coating materials.

29. The operator shall ensure that halogenated volatile organic compounds with designated Risk Phrase R40 until 1 June 2015 and from 1 December 2010 R68 and from 1 December 2010 designated hazard statement H341 and H351 are not used in the coating materials

Visible and odorous emissions

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

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

32. There shall be no offensive odour beyond the site boundary, as perceived by the regulator.

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

General Conditions

34. All emissions of VOC's shall be emitted from the chimneys and vents serving the spray booths shall not be less than 3 metres above the roof ridge height of any building within 15 metres of the base of the chimney or vent.

35. The activity shall operate in accordance with an environmental management system that ensures full compliance with the conditions in this permit.

36. Staff at all levels shall receive the necessary training and instruction includes:

- awareness of their responsibilities under the Permit; in particular how to
- deal with conditions likely to give rise to VOC emissions,
- minimising emissions on start up and shut down
- action to minimise emissions during abnormal conditions.

37.A record of staff training and instruction, comprising the name of the trainee and the subject matter of the training, shall be maintained by the operator.

38.A written record of all maintenance carried out in accordance with Condition 3 shall be made available for inspection by the regulator.

39.The operator shall use best available techniques for preventing, or where this is not practical, reducing emissions from the installation.

In relation to this authorisation, any reference to ‘The Council’ shall mean Wychavon District Council. In addition, any information required to be sent should be sent to the correspondence address (Worcestershire Regulatory Services) detailed on the front page of this permit.



.....
 Toni Ainscough
 Environmental Health Officer
 Worcestershire Regulatory Services
An authorised officer of the Council

Date 13/07/2020

.....END OF PERMIT.....

Figure 1 – instillation boundary



EXPLANATORY NOTES

These notes do not form part of the Permit

This permit is given in relation to the requirements of the Pollution Prevention and Control Act 1999 and subordinate regulations. It must not be taken to replace any responsibilities you may have under workplace health and safety legislation.

This permit, in that it regulates only air pollution matters, does not absolve you of the responsibility of any other statutory requirement, such as any need to obtain planning permission, hazardous substances consent or Building Regulations approval from the Council. Discharge consents from the local sewage undertaking or a waste disposal licence from the Environment Agency may still be required.

This permit is covered by Secretary of State's Guidance and can be viewed via the following link:

<http://www.defra.gov.uk/environment/quality/industrial/las-regulations/guidance/>

Secretary of State's Guidance Original Coating of Road Vehicles and Trailers	PG6/47(11)
Secretary of State's Guidance Respraying of Road Vehicles	PG6/34(11)
General Guidance Manual on Policy and Procedures for A2 and B Installations.	

The operator will be liable to enforcement action where;

- A. a change is made (without approval of the regulator) to the activities described in the permit,
- B. any of the activities are carried on outside process boundary,
- C. a new activity (as defined within the Environmental Permitting (England and Wales) Regulations 2010) is carried on without a proper permit, and
- D. any of the conditions of the permit are breached.

An annual fee due on 1st April each year (currently chargeable per activity per annum but subject to change by statutory instrument) is payable to Malvern Hills District Council.

It is an offence to operate the prescribed activity without a current permit.

Anyone who is aggrieved by the conditions attached to a permit can appeal to the Secretary of State for the Environment, Food and Rural Affairs. Appeals must be made in accordance with the requirements of Regulation 31 and Schedule 6 of the EP regulations.

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

The Planning Inspectorate
Environment Team, Major and Specialist Casework
Room 4/04 Kite Wing
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN

Please note

An appeal brought under Regulation 31 (1) (b) and Schedule 6, in relation to the conditions in a permit will not suspend the effect of the conditions appealed against; the conditions must still be complied with.

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

Contact Details: Worcestershire Regulatory Services
 Wyre Forest House
 Finepoint Way
 Kidderminster
 Worcestershire
 DY11 7WF
E-mail wrsenquiries@worcesterservices.gov.uk