



**Schedule 1**

**POLLUTION PREVENTION AND CONTROL ACT 1999  
ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2010**

**PERMIT TO OPERATE A SCHEDULED INSTALLATION**

**Installation**

W.T. Boroughs Coachworks

Colonial Way, Watford, Hertfordshire, WD24 4PT

**Name and address of operator**

W.T. Boroughs Coachworks

Colonial Way, Watford, Hertfordshire, WD24 4PT

**Application details**

Application received:	November 1992
Date of issue of permit:	20th November 1992
Permit Varied:	8 <sup>th</sup> September 1999
Permit Varied:	30 <sup>th</sup> March 2005
Permit Varied:	9 <sup>th</sup> January 2008
Permit Varied:	30 <sup>th</sup> June 2010
Permit Varied:	24 <sup>th</sup> May 2011

**Enforcing Authority**

The relevant enforcing authority is:

Watford Borough Council  
Environmental Services  
Town Hall  
Watford  
Hertfordshire  
WD17 3EX

Tel: 01923 278503

Fax: 01923 230765

### **Category of Permitted Activity**

Statutory Instrument 2010 No. 675; Schedule 1; Chapter 6 - Other Activities; Section 6.4 - Coating Activities, Printing and Textile Treatments; Part B (b) ) "painting or re-spraying road vehicles or parts of them if the activity may result in the release into the air of particulate matter or of any volatile organic compound and the carrying on of the activity is likely to involve the use of 1 tonne or more of organic solvents in any period of 12 months".

### **References**

Process Guidance Note PG6/34 (11) - Statutory Guidance for Re-spraying of Road Vehicles; Department for Environment, Food and Rural Affairs; March 2011.

Environmental Permitting - General Guidance Manual on Policy and Procedures for A2 and B Installations; Department for Environment, Food and Rural Affairs; May 2011.

The Environmental Permitting Regulations (England and Wales) Regulations 2010, Statutory Instrument 2010 No. 675.

### **Statement of Permitting**

The above named company is permitted to operate a vehicle refinishing installation subject to compliance with the following conditions. The installation boundary is shown on the plan in Appendix 1 accompanying this Permit and forming part of it.

### **Conditions**

#### **Non VOC Emissions**

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

		<b>Source</b>	<b>Emission Limits/Provisions</b>	<b>Type of Monitoring</b>	<b>Monitoring Frequency</b>
1	Particulate matter	From spray booths	10 mg/Nm <sup>3</sup>	By guarantee supplied by the spray booth constructor	None required
2	Sulphur Dioxide	All processes/ activities	1% wt/wt sulphur in fuel	Certification by supplier on first delivery	None required
		All processes/ activities using gas oil as defined in the Sulphur Content of Certain Liquid Fuels Directive (1999/32/EC)	0.1% wt/wt sulphur in fuel		

All emissions shall be determined at the standard reference conditions of 273.15K 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 implement a maintenance schedule a copy of which shall be made available to the regulator upon request.

4. Dusty wastes shall be stored in closed containers.

5. Dry sweeping of dusts and dusty wastes shall not be used.

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

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

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

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

9. 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.

10. 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;
- Promptly record the events and actions taken; and
- Notify the regulator without delay, if the emission is likely to have an effect on the local community.

## **VOC Emissions**

11. Surface preparation and painting operations shall be carried out using only coating materials, which are placed on the market for use in vehicle refinishing body shops (as identified by a label on the container containing the following information - a description of the product by identification of the contents as a subcategory of Directive 2004/42/CE, the relevant VOC limit values in g/l as referred to

in Annex II of Directive 2004/42/CE and the maximum content of VOC in g/l of the product in a ready to use condition). For information, the individual body shop products that are covered by this permit are listed in the following table:

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

12. 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 the table above (condition 11).

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

14. Spray applied coatings shall be applied to passenger cars using one of the following methods:

- High volume low pressure (HVLP) (maximum atomisation pressure 67.5kPa) spraying equipment;
- Air assisted airless spraying equipment;
- Electrostatic spraying equipment; or
- A system capable of achieving a transfer efficiency of at least 65%, determined in accordance with the procedure set out in BS EN 13966-1:2003 Determination of the transfer efficiency of atomising and spraying equipment for liquid coating materials.

15. Spray applied coatings shall be applied to commercial vehicles using one of the techniques in Section 3.5 of Process Guidance Note 6/34 (11) or using airless spraying equipment.

16. 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.

17. 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.

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

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

20. Solvent contaminated wipes and other wastes shall be handled in accordance with a written procedure a copy of which shall be made available to the regulator upon request.

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

22. 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;
- 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

Note: These conditions should not conflict with the requirements of occupational health and safety regulations.

23. 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; and
- Away from sources of heat.

24. 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.

25. 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 spray booth and abrasive blasting plant breakdowns can be rectified rapidly.

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

### **Visible and odorous emissions**

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

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

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

30. 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**

31. All emissions of pollutants shall be emitted from an appropriately sized stack. The stack shall terminate a minimum of 3 metres above the roof ridge height of any building within 15 metres of the base of the chimney or vent.
32. The activity shall operate in accordance with an appropriate environmental management system.
33. Staff at all levels shall receive the necessary training and instruction.
34. A record of staff training and instruction shall be maintained by the operator and shall be available to the regulator on request.
35. A written record of all maintenance carried out in accordance with Condition 3 shall be made available for inspection by the regulator.
36. The best available techniques shall be used to prevent, or where that is not practicable, reduce emissions from the installation in relation to any aspect of the operation of the activity which is not specifically regulated by any condition of this permit.
37. If the operator proposes to make a change in operation of the installation, they must, at least 14 days before making the change, notify the regulator in writing. The notification must contain a description of the proposed change in operation. It is not necessary to make such a notification if an application to vary this permit has been made and the application contains a description of the proposed change. In this condition 'change in operation' means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.

Signed:

Date:

Head of Environmental Services  
On behalf of Watford Borough Council

## ADDITIONAL NOTES

***These notes do not comprise part of the permit, but contain guidance relevant to it.***

### **General Principles**

The Local Authority Pollution Prevention and Control (LAPPC) regime is concerned with preventing, or where that is not practicable, reducing emissions into the air (Regulation 35(b) Schedule 8(3)). This is achieved by, among other things, requiring operators to use the best available techniques (BAT). This, together with a consideration of local circumstances, provides the main basis for setting emission limit values and operational controls.

### **BAT (Best Available Techniques)**

Article 2(11) of the IPPC Directive defines best available techniques as “the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing in principle the basis for emission limit values designed to prevent, and where that is not practicable, generally to reduce emissions and the impact on the environment as a whole”. Techniques shall include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned. Available techniques shall mean those developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the costs and advantages, whether or not the techniques are used or produced inside the Member State in question, as long as they are reasonably accessible to the operator. Best shall mean most effective in achieving a high general level of protection of the environment as a whole. In determining the best available techniques, special consideration should be given to the items listed in Annex IV of the Directive.

### **Confidentiality**

The permit requires the operator to provide information to Watford Borough Council. The Council will place the information onto the public registers in accordance with the requirements of the Environmental Permitting (England and Wales) Regulations 2010 (the Regulations). If the operator considers that any information provided is commercially confidential, it may apply to the Council to have such information withheld from the register as provided in the Regulations. To enable the Council to determine whether the information is commercially confidential, the operator should clearly identify the information in question and should specify clear and precise reasons.

### **Variations to the permit**

This permit may be varied in the future. If at any time the activity or any aspect of the activity regulated by the following conditions changes such that the conditions no longer reflect the activity and require alteration, the Council shall be contacted.

### **Surrender of the permit**

Where an operator intends to cease the operation of an installation (in whole or in part), the regulator shall be informed in writing. Such notification must include the information specified in regulation 24(3) of the Regulations.

### **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 21 of the 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.

### **Responsibility under workplace health and safety legislation**

This permit is given in relation to the requirements of the Environmental Permitting (England and Wales) Regulations 2010. It must not be taken to replace any responsibilities you may have under Workplace Health and Safety legislation.

### **Inspections**

Regular inspections will be made by officers of Watford Borough Council in order to check and ensure full compliance with this permit.

### **Annual subsistence charge**

A subsistence charge is payable on the 1st April each year. An invoice will be issued by the regulator providing further details of how to pay.

### **Appeal against permit conditions**

Anyone who is aggrieved by the conditions attached to a permit can appeal to the Secretary of State. Appeals must be made in accordance with the requirements of Regulation 31 and Schedule 6 of the Regulations. Appeals should be received by the Secretary of State at the following address:

The Planning Inspectorate  
Environment Team, Major & 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 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 also allows the Secretary of State to quash any of the other conditions not subject to the appeal and to direct the local authority either to vary any of these other conditions or to add new conditions.

**End of note**



**APPENDIX 1: SITE PLAN**

