

**Pollution Prevention and Control Act 1999  
The Environmental Permitting  
(England and Wales) Regulations 2016**



Waveney District Council  
Serving the Community

**INSTALLATION PERMIT**

**REF – PPC/07/3/1**

**Permit to Operate an Original Coating of  
Vehicle and Trailer Process and a  
Respraying of Road Vehicles Process**

**Belle Coachworks Ltd  
28 Pinbush Road  
Lowestoft  
Suffolk  
NR33 7NL**

Belle Coachworks Ltd is hereby permitted by Waveney District Council to carry on an original Coating of Vehicle and Trailer Process as prescribed in Schedule 14 of The Environmental Permitting (England and Wales) Regulations 2016 and a Vehicle Respraying Process as prescribed in Section 6.4(b), Part 2 of Schedule 1 of The Environmental Permitting (England and Wales) Regulations 2016, as described below and within the installation boundary as marked red on the attached plan reference PPC/07/3/1 Plan, in accordance with the conditions detailed in Section 2 of this Permit.

Signed..... Date 16<sup>th</sup> October 2017

Environmental Health Officer  
Authorised to sign on behalf of Waveney District Council

## **Pollution Prevention and Control Act 1999 Environmental Permitting (England and Wales) Regulations 2016**

**Consolidated Permit Reference Number PPC/07/3/1  
Schedule 2 Variation Notice 17/05830/PPCAPP**

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# **Section One**

## **Introductory Note & Description of Permitted Installation**

## Permit Reference No. PPC/07/3/1

### Introductory Note

| Permit Holder:                 | Belle Coachworks Ltd                                |
|--------------------------------|---|
| Installation Address:          | 28 Pinbush Road<br>Lowestoft<br>Suffolk<br>NR33 7NA |
| Registered Address of Company: | As Above  |
| Company Number:                | 04065413  |

| Provenance                             | Date                           |
|--|--------------------------------|
| Application for Authorisation (EPA 90) | 12 <sup>th</sup> January 1993  |
| Authorisation issued                   | 23 <sup>rd</sup> July 1993     |
| Review of Authorisation                | 14 <sup>th</sup> November 2001 |
| Permit Deemed Application              | 1 <sup>st</sup> April 2003     |
| Permit Issued                          | 6 <sup>th</sup> September 2007 |
| Permit Varied by substantial change    | 16 <sup>th</sup> October 2017  |

The following Process Guidance Notes apply to this installation:

**6/34(11) – Re-spraying of road vehicles**

**6/47(11) – Original coating of road vehicles and trailers**

### Process Description

- 1.1 The process operated is the coating and respraying of commercial vehicle bodies and trailers using more than 0.5 tonnes of original coating in a 12 month period. As a whole the installation falls within Schedule 14 and Schedule 1 Part 2 Sections 6.4(b) of The Environmental Permitting (England and Wales) Regulations 2016. The activity had previously been defined under the legislation as a Solvent Emissions Directive (SED) activity for the respraying of road vehicles. However this permit now includes the coating of vehicles and trailers where 0.5 tonnes or more of solvent is used. This brings the process into Schedule 14 of the Regulations as a Solvent emission activity and guidance in this respect can be found in Process Guidance Note 6/47(11) (revised in 2014).

This permit permits the use of non-complaint coatings some of which may contain high levels of VOC and hazardous materials.

- 1.2** The spraying of commercial vehicles and trailers can be broken down into the following stages:-
- (a) Fabrication of vehicle body
  - (b) Installation of body onto vehicle chassis
  - (c) Mixing of paint
  - (d) Loading the spray gun
  - (e) Applying the coating
  - (f) Cleaning the gun
  - (g) Drying the coating
  - (h) Curing the coating.
- 1.3** The preparation of the vehicle includes fabricating and installation of the body for onto the chassis. Once the construction of the vehicle body is complete to the customer's specification the surfaces are prepared prior to spraying. This involves wiping down any metal surfaces that may have grease or oil contamination and sticking masking tape on surfaces which do not require paint.
- 1.4** All materials are received in sealed containers and are stored in the paint store until required for use. Paint, clear lacquer and primers are activated in a mixing room, which is fitted with an extraction system.
- 1.5** After the pre-treatment and preparation of the vehicle bodywork, a corrosion protection primer or primer surfacer is usually applied to the areas where there is bare metal. Primer is also applied to metal substrates. Undercoat is applied to new parts and to plastic components, to improve adhesion.
- 1.6** A coat of surfacer is then sprayed onto the sanded fine stopper and primer. The dried coat of surfacer is flatted, and provides a smooth substrate onto which the topcoat adheres well, giving the paint finish good visual properties. An alternative process is wet-on-wet application in which the topcoat is applied straight onto the surfacer immediately after flash-off without intermediate sanding.
- 1.7** Finally, the topcoat is applied – in one, two or three coats according to the paint system
- 1.8** Single coat topcoats provide both colour and gloss. For multi-coat systems, paints of different types are employed for the different coats. In two coat topcoats, basecoats impart colour or colour effects (e.g. in metallic and pearl effect paints). Such effects are not available from single coat topcoats. In three coat topcoats, an additional sealer is employed to prevent the surfacer grinning through a rather translucent basecoat film. Clear-coats are applied over the basecoats, and are designed to control the gloss and flow properties of the overall paintwork. Clear-coat can sometimes be applied over single coat topcoats, particularly to blend in a small repair area.

In addition to their optical properties, topcoats also have to provide:

- In-use properties, such as weather-resistance, resistance to fuels, deicing salt and bird droppings, and resistance to stone-chipping and scratching,
- Application properties to permit easy matching with the colour shades and effects of the original paintwork, and fast drying and low drying temperatures.

**1.9** All paint spraying takes place in the dedicated enclosed Dalby spray booth. The booth uses dry under floor particulate filters linked to the booth extraction systems. The booth will only operate under a negative pressure. An interlock system with alarm prevents the booth being operated if there is a positive pressure. The extracted air is discharged to atmosphere at a height of at least 3m above the roof ridge height of the building housing the booths. The booth can be split into two sections depending upon the size of commercial vehicle being sprayed.

**1.10** The booth/oven heating is achieved by the combustion of natural gas. To effectively apply the spray paint coating, the booth is kept at a temperature between 15 – 25 °C. Once the base coat has been applied to the vehicle or body panel it is left to dry in the booth for approximately 20 minutes. A topcoat lacquer requires extra drying time and has to be cured. As such the temperature of the booth is increased to between 40 to 50°C and baked for approximately 30 to 40 minutes.

**1.11** Spray applications are carried out by the use of a high volume low pressure (HVLP) spray gun based upon a pressure pot system.

**1.12** Any surplus material from the spraying operation not required for further use is stored in sealed containers in the paint mixing room.

**1.13** Spray guns are cleaned in the spray booth after use. The dirty solvent is recycled in a still which is located in the paint store.

**1.14** The principal sources of releases to air from the process are:-

- (i) Particulates from preparation of vehicles
- (ii) VOC emissions from storage of paint and preparation of paint
- (iii) VOC emissions from paint spraying booths
- (iv) VOC emissions from cleaning of spray guns.

# **Section Two**

## **Permit Conditions**

**Pollution Prevention and Control Act 1999  
Environmental Permitting (England and Wales) Regulations 2016  
Schedule 14 and Schedule 1 Part 2 Section 6.4 (b)**

**Permit Reference No. PPC/07/3/1**

The conditions contained within this Permit are based upon Guidance Note PG 6/47 (11) "Original Coating of Road Vehicles and Trailers" and PG 6/34 (11), "Respraying of Road Vehicles"

The requirements of the conditions attached to this permit shall come into effect immediately.

## **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

| <b>Table 1.1</b>   |  |
|--|--|
| <b>Activity or Associated Activity listed in the EP Regulations</b>  | <b>Description of specified activity</b>   |
| Part 2, Chapter 6, Section 6.4, Part B, (b) – repainting or re-spraying of road vehicles or parts of them. | Re-painting 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 12 month period   |
| Schedule 14, Solvent Emission Activity.  | The coating of road vehicles or part of them with refinishing type material, where this is carried out away from the manufacturing line and the original coating of trailers (including semi-trailers) 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 the 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 boundary, being the area shown hatched on the plan reference PPC/07/3/1 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 28 days before the changes take place.

1.4 The best available techniques shall be used to prevent or, where that is not practicable, reduce emissions from the installation in relation to any aspect of the operation of the installation which is not regulated by any other condition of this permit.

## 2.0 NON-VOC EMISSIONS

2.1 The following non-VOC emission limits shall apply:

| Table 2.1  |                    |                   |                              |  |                      |
|--|--------------------|-------------------|------------------------------|--|----------------------|
|  | Substance          | Source            | Emission limits / provisions | Type of Monitoring   | Monitoring frequency |
| 1  | Particulate matter | From spray booths | 10 mg/Nm <sup>3</sup>        | By guarantee supplied by the spray booth constructor <b>or</b> Manual extractive testing | Annual               |
| All emissions shall be determined at the standard reference conditions of 273.15K and 101.3KPa, without correction for water vapour content. |                    |                   |                              |  |                      |

2.2 A written guarantee shall be obtained from the constructor of each spray booth/oven in the event of any modifications which may affect the current certificate of compliance. The concentration of total particulate matter in the final discharge to air shall not exceed 10 mg/Nm<sup>3</sup>. The guarantee shall be supported by emission test data for the spray booth/oven fitted with the filtration system, to which the guarantee relates.

2.3 In the absence of a guarantee that satisfies the requirements of condition 2.1, the manual extractive monitoring of particulate matter from the spray booths shall be carried out once in every period of 12 months in accordance with the relevant applicable standards which can be found at the Source Testing Association website (<http://www.s-t-a.org/>).

2.4 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.

- 2.5 The operator shall notify the regulator at least 28 days before any periodic monitoring exercise to determine compliance with emission limit values. The operator shall state the provisional time and date of monitoring, pollutants to be tested and the methods to be used.
- 2.6 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 of the cause and extent of the problem;
  - record the action taken to rectify the situation;
  - re-test to demonstrate compliance as soon as possible and notify the Council.
- 2.7 Within 8 weeks of the completion of monitoring activities, the operator shall forward the results of non-continuous emission monitoring to the Council.
- 2.8 The operator shall keep records of inspections, tests and monitoring in relation to the provisions of the Table 2.1. In such cases:
- current records shall be kept on site and made available for the Council to examine; and
  - records shall be kept by the operator for at least two years
- 2.9 In the case of abnormal emissions, or malfunction or breakdown leading to abnormal emissions, the operator shall:
- investigate immediately and undertake corrective action;
  - adjust the process or activity to minimise those emissions; and
  - promptly record the events and actions taken;
  - notify the Council without delay, if the emission is likely to have an effect on the local community.
- 2.10 All operations such as welding, sanding and mechanical grinding shall be carried out within a building. The local extraction system shall be used on all power tools, which are likely to give rise to odour, fumes or particulate matter.

### **3.0 VOC EMISSIONS**

#### **[FOR THE RE-SPRAYING OF ROAD VEHICLES]**

- 3.1 Surface preparation and painting operations shall be carried out using only coating materials, which are placed on the market for use in vehicle refinishing bodyshops (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 bodyshop products covered by this condition are listed in Appendix 2.

- 3.2 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 Appendix 3 to this Permit.

**[FOR THE ORIGINAL COATING OF ROAD VEHICLES OR TRAILERS]**

- 3.3. Conditions 3.1 and 3.2 above do not apply to the original coating of road vehicles or part of them with refinishing-type materials or the coating of trailers (including semi-trailers), it applies only to vehicle refinishing activities.
- 3.4 All paint mixing shall take place within areas with the extract ventilation system running. All paint spraying operations shall be carried out in totally enclosed booths under negative pressure to prevent fugitive emissions of VOCs.
- 3.5 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%.
- 3.6 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.
- 3.7 All spray gun testing and spray out following cleaning shall be carried out in either an equipment cleaning machine with the extraction running or into a chamber which is provided with extraction which is running in accordance with a written procedure, a copy of which shall be made available to the regulator upon request. The operator shall inform the Council in writing of any significant changes to the written procedure.
- 3.8 Cleaning solvents shall be dispensed by a piston type dispenser or similar contained device, when used on wipes.
- 3.9 Pre-impregnated solvent wipes shall be held within an enclosed container prior to use.
- 3.10 Solvent contaminated wipes and other wastes shall be handled in accordance with a written procedure, a copy of which shall be made available to the regulator upon request. The operator shall inform the Council in writing of any significant changes to the written procedure.
- 3.11 Organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas.

- 3.12 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;
  - away from any sources of heat.
- 3.13 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 any sources of heat.
- 3.14 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 Council shall be provided with a report on the conclusions of the review, within eight weeks of it being completed.
- 3.15 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 breakdowns can be rectified rapidly.
- 3.16 Waste solvents and waste coatings shall be recycled. Copies of receipts of waste materials sold for recycling shall be kept for three years.

#### **4.0 SOLVENT REDUCTION SCHEME**

- 4.1 Conditions 4.2 and 4.3 only apply to the use of coating materials used in the original coating of road vehicles or part of them with refinishing-type materials or the coating of trailers (including semi-trailers).
- 4.2 Compliance with the Industrial Emissions Directive shall be via the Solvent Reduction Scheme. The total annual solvent emission from the coating activity shall not exceed the target emission detailed in Table 4.1.

| <b>Table 4.1</b>           |
|----------------------------|
| <b>Target Emission</b>     |
| Total mass of solids x 1.2 |

In order to demonstrate compliance with this condition a calculation of the “annual solvent emission” and the “total mass of solids” and “target emission” shall be carried out annually in accordance with the Solvent Management Plan, attached to the Permit as Appendix 4, where the terms “annual actual solvent emission” and “total mass of solids” are defined. These calculations shall be submitted annually to the Council by 31<sup>st</sup> January.

- 4.3 Solvents carrying the hazard statements H340, H350, H350i, H360D or H360F (or risk phrases R45, R46, R49, R60, R61) or any halogenated volatile organic compounds assigned hazard statements H341 or H351, (or risk phrases R40 and R68) shall be replaced, as far as possible, in the shortest possible time.

## **5.0 VISIBLE EMISSIONS**

- 5.1 All releases to air, other than condensed water vapour, shall be free from persistent visible emissions and free from droplets.
- 5.2 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 2742:2009.

## **6.0 PROCESS CONTROLS**

- 6.1 The operator shall implement a maintenance schedule a copy of which shall be made available to the Council upon request. The operator shall inform the Council in writing of any significant changes to the schedule.
- 6.2 Dusty wastes shall be stored in closed containers.
- 6.3 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.
- 6.4 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.

## **7.0 GENERAL CONDITIONS**

- 7.1 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 8.1.

7.2 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. Training should include:

- Awareness of operator responsibilities under the Permit
- Steps necessary to minimise emissions during start-up and shutdown
- Actions to take when there are abnormal conditions, or accidents, or spillages that could, if not controlled, result in emissions

A record shall be maintained of all relevant training provided to staff in accordance with condition 8.1.

7.3 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 8.1.

7.4 Essential spares and consumables (especially those subject to continual wear) such as booth filters shall either be held on site or available at short notice from suppliers in order to rectify any breakdowns and ensure the effective and efficient operation of the spraying process.

7.5 The height of the chimney/vent from the spray booths shall not be less than 3 meters above the ridge of any building and within 15 meters of the base of the chimney or vent and shall take into account the need to render harmless any residual odour.

7.6 The chimneys or vents shall not be fitted with any final opening restriction other than a cone fitted at the chimney exit to increase efflux velocity. Discharge shall be vertically upwards.

7.7 The chimneys/vents shall all be inspected and cleaned regularly as necessary to prevent accumulations of material.

## **8.0 RECORDS**

8.1 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:

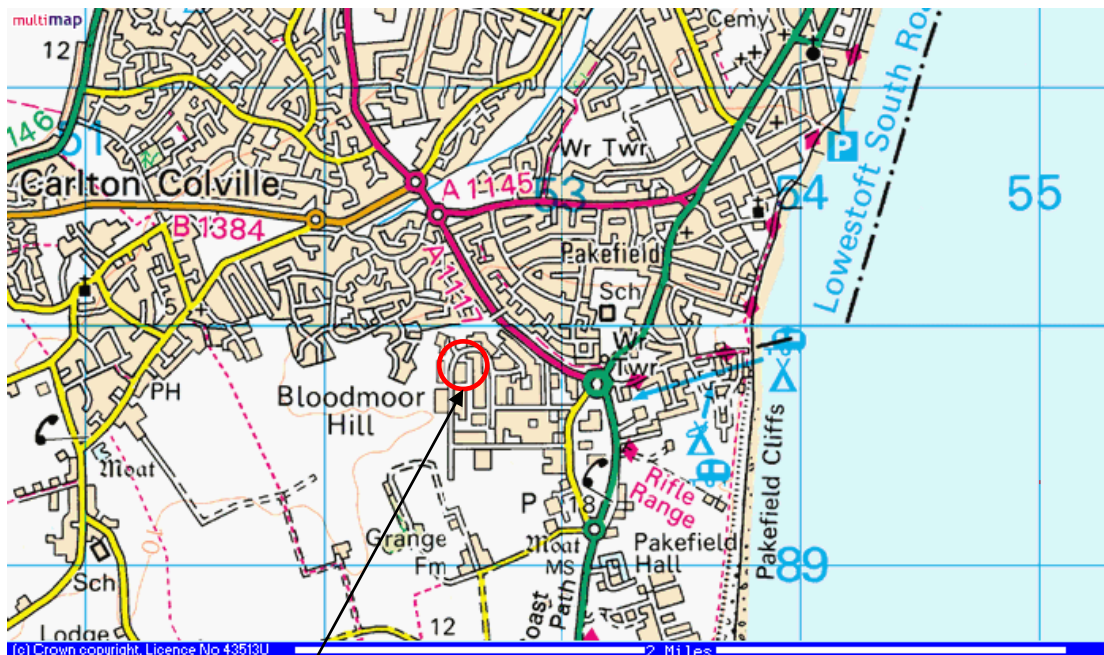
- (a) be made available for inspection by the Council at any reasonable time;
- (b) be supplied to the Council on demand and without charge;
- (c) be legible;
- (d) be made as soon as reasonably practicable;
- (e) indicate any amendments which have been made and shall include the original record wherever possible; and
- (f) be retained at the Installation, or other location agreed by the Council in writing, for a minimum period of 2 years from the date when the records were made, unless otherwise agreed in writing.

- 8.2 The process operator shall keep a detailed record of all; paint, hardner, organic solvent, sub-start and equipment cleaning materials used. The record shall be kept in such a way that the organic solvent usage can be calculated. The records shall be made available to the local enforcing inspector on request.
- 8.3 Evidence shall be retained to show that “compliant coatings” are being used as defined in Appendix 3 of this Permit.
- 8.4 A logbook shall be kept specifically and solely for the purpose of recording all maintenance and monitoring carried out in compliance with permit conditions.
- 8.5 The records contained in the log book shall be retained for at least four years and shall be made available for inspection by an Officer of the Enforcing Authority on request.
- 8.6 A responsible person shall be nominated to act of behalf of the company, who will be responsible for ensuring that all; tests, emission monitoring and maintenance measures that are required under this Permit are carried out. The responsible person shall be named in the log book.
- 8.7 Complete and immediate access to the premises shall be granted to a duly authorised officer of the Local Authority upon request.
- 8.8 A copy of this Permit shall be kept on the premises.

# Appendix 1

## Location of Permitted Installation

### Site Plan PPC/07/3/1



**Belle Coachworks Ltd**  
**28 Pinbush Road**  
**Lowestoft**  
**Suffolk**  
**NR33 7NL**



## Local Location Plan PCC/07/3/1

Site Boundary 



**Belle Coachworks Ltd**  
**28 Pinbush Road**  
**Lowestoft**  
**Suffolk**  
**NR33 7NL**

# Appendix 2

## **INDIVIDUAL BODYSHOP PRODUCTS COVERED UNDER THE PAINTS DIRECTIVE 2004/42/EC**

Those coating materials placed on the market for use in vehicle refinishing body shops are identified by a label on the container containing the following information:

1. A description of the product by identification of the contents as a subcategory of directive 2004/42/CE;
  2. The relevant Volatile Organic Compound limit values in grams per litre as referred to in Annex II of directive 2004/42/CE; and
  3. The maximum content of Volatile Organic Compounds in grams per litre of the product in a ready to use condition.
- a) 'preparatory and cleaning' means products designed to remove old coatings and rust, either mechanically or chemically, or to provide a key for new coatings:
- (i) preparatory products include gunwash (a product designed for cleaning spray-guns and other equipment), paint strippers, degreasers (including anti-static types for plastic) and silicone removers;
  - (ii) 'precleaner' means a cleaning product designed for the removal of surface contamination during preparation for and prior to the application of coating materials;
- b) 'Bodyfiller/stopper' means heavy-bodied compounds designed to be applied to fill deep surface imperfections prior to the application of the surfacer/filler;
- c) 'primer' means any coating that is designed for application to bare metal or existing finishes to provide corrosion protection prior to application of a primer surfacer:
- (i) 'surfacers/filler' means a coating designed for application immediately prior to the application of topcoat for the purpose of corrosion resistance, to ensure adhesion of the topcoat, and to promote the formation of a uniform surface finish by filling in minor surface imperfections;
  - (ii) 'general metal primer' means a coating designed for application as primers, such as adhesion promoters, sealers, surfacers, undercoats, plastic primers, wet-on-wet, non-sand fillers and spray fillers;

- (iii) 'wash primer' means coatings containing at least 0,5 % by weight of phosphoric acid designed to be applied directly to bare metal surfaces to provide corrosion resistance and adhesion; coatings used as weldable primers; and mordant solutions for galvanised and zinc surfaces;
- d) 'topcoat' means any pigmented coating that is designed to be applied either as a single-layer or as a multiple-layer base to provide gloss and durability. It includes all products involved such as base coatings and clear coatings:
  - (i) 'base coatings' means pigmented coatings designed to provide colour and any desired optical effects, but not the gloss or surface resistance of the coating system;
  - (ii) 'clear coating' means a transparent coating designed to provide the final gloss and resistance properties of the coating system;
- e) 'special finishes' means coatings designed for application as topcoats requiring special properties, such as metallic or pearl effect, in a single layer, high-performance solid-colour and clear coats, (e.g. anti-scratch and fluorinated clear-coat), reflective base coat, texture finishes (e.g. hammer), anti-slip, under-body sealers, anti-chip coatings, interior finishes; and aerosols.

## Appendix 3

### PRODUCT CATEGORIES AND MAXIMUM, APPLICATION READY VOLATILE ORGANIC COMPOUND CONTENTS UNDER PAINTS DIRECTIVE 2004/42/EC

|  | PRODUCT SUBCATEGORY      | COATINGS                                  | VOLATILE ORGANIC COMPOUNDS grams/litre(*) |
|--|--------------------------|---|---|
| a  | Preparatory and cleaning | Preparatory<br>Pre-cleaner                | 850<br>200                                |
| b  | Bodyfiller/stopper       | All types                                 | 250                                       |
| c  | Primer                   | Surface/filler and general (metal) primer | 540                                       |
|  |                          | Wash primer                               | 780                                       |
| d  | Topcoat                  | All types                                 | 420                                       |
| e  | Special finishes         | All types                                 | 840                                       |
| (*) grams/litre of ready for use product. Except for subcategory (a) any water content of the product ready for use should be discounted |                          |   |   |

# Appendix 4

## SOLVENT REDUCTION SCHEME

1. The reduction scheme is the preferred method of preventing and minimising emissions of VOC, using non-abatement techniques such as:
  - water borne coatings (low organic solvent content);
  - higher solids content coatings;
  - powder coatings;
  - organic solvent free liquid coatings; radiation cured coatings (for example, ultra violet and electron beam).
2. An operator may choose to use the reduction scheme for an installation to achieve emission reductions to a 'target emission' equivalent to those which would have been achieved if the concentration emission limits had been applied.

The following scheme should operate for installations for which a constant solid content of product can be assumed and used to define the reference point for emission reductions.

The operator should forward an emission reduction plan, which includes;

- a) mechanisms to decrease the average solvent content of the total input; and/or
- b) systems to increase efficiency in the use of solids to achieve a reduction of the total emissions from the installation.

The target emission from an installation should be calculated by multiplying the total mass of solids in the quantity of coatings used in a year with the relevant figure given in **Table 3.1** above. In determining the total mass of solids:

- all ingredients other than water and organic solvents should be assumed to form part of the solid coating;
- solids are all materials in coatings that become solid as a result of curing, polymerisation, or the evaporation of the water or solvent (usually available from the supplier in g/l or non-volatile % mass by weight); and
- In cases of doubt, the reference standard for the determination of non-volatile % mass by weight is BS EN ISO 3251 (also numbered BS 3900: B18). The test conditions may need to be adjusted for the particular conditions of use or when assessing chemically or radiation cured coatings, where otherwise volatile components react to form part of the dry solid coating

3. Compliance with reduction scheme is achieved if the annual actual solvent emission determined from the solvent management plan is less than or equal to the target emission. Where the annual actual solvent emission =  $I_1 - O_8 - O_7 - O_6 - O_5$  (if abatement has been used). See paragraph 8.
4. The flexibility inherent in this compliance route should not be taken to encourage:
  - the replacement of a low or no organic solvent coating system with a conventional high organic solvent coating system; **or**
  - the introduction of such a conventional high organic solvent coating system into a process/activity; **or**
  - the introduction of such a conventional high organic solvent coating system onto a product where it was not in use before; **or**
  - the introduction of high solids formulations which have no beneficial effect on the product but increase the solids used, except where a reduction in the overall VOC emissions can be demonstrated.

Prior notification to the Council must be given of any proposal to introduce such systems, which should include reasons why lower organic solvent systems are not considered technically appropriate or practicable.

## **DETERMINATION OF SOLVENT CONSUMPTION**

5. Construction of inventories of materials consumed and disposed of may involve the identification of individual organic solvents, or solids. This may give rise to an issue of commercial confidentiality. Information supplied must be placed on the public register, unless exclusion has been granted on the grounds of commercial confidentiality or national security. Further information can be found in the appropriate chapter of the relevant General Guidance Manual.
6. A determination of the organic solvent consumption, the total mass of organic solvent Inputs minus any solvents sent for reuse/recovery off-site, should be made and submitted to the regulator annually, preferably to coincide with the operators stocktaking requirements. This should be in the form of a mass balance in order to determine the annual actual consumption of organic solvent (C):

**Where:  $C = I_1 - O_8$  (See paragraph 8).**

## SOLVENT MANAGEMENT PLAN

7. Operators buy solvents to replace those lost during the process or included in the product. There are both environmental and cost savings from reducing the losses. The industrial emissions Directive requires a solvent management plan to demonstrate compliance with fugitive emission limits (SE Box 5), and give the public access to information about solvent consumption etc.
8. The industrial emissions Directive provides guidance on what constitutes a solvent input and an output. This can be described more simply as needing data on:

### Inputs:

How much solvent is:

- bought, whether in pure form or contained in products;
- recycled back into the process.

### Outputs:

How much solvent is:

- emitted to air, whether directly or via abatement equipment;
- discharged to water, whether directly or via water treatment;
- sent away in waste;
- lost by spills, leaks etc;
- leaving the installation in the product.

The definitions in Annex VII, Part 7 of the industrial emissions Directive are as follows and are shown diagrammatically in Figure 1.

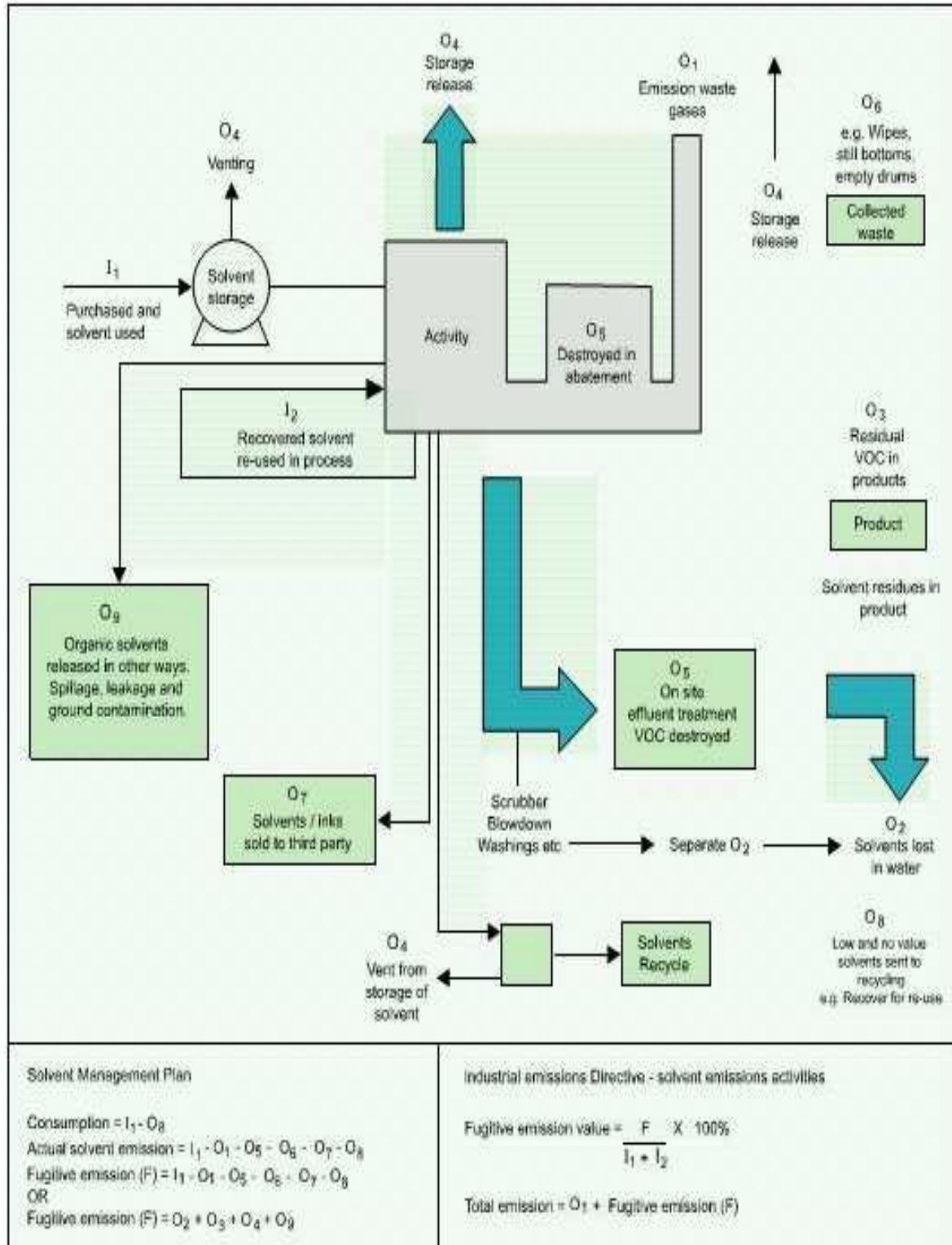
**Inputs of organic solvent** in the time frame over which the mass balance is being calculated (I)

- I<sub>1</sub> The quantity of organic solvents or their quantity in mixtures purchased which are used as input into the process/activity (including organic solvents used in the cleaning of equipment, but not those used for the cleaning of the products).
- I<sub>2</sub> The quantity of organic solvents or their quantity in mixtures recovered and reused as solvent input into the process/activity. (The recycled solvent is counted every time it is used to carry out the activity)

**Outputs of organic solvents** in the time frame over which the mass balance is being calculated (**O**)

- O<sub>1</sub>** Emissions in waste gases.
- O<sub>2</sub>** Organic solvents lost in water, if appropriate taking into account waste water treatment when calculating **O<sub>5</sub>**
- O<sub>3</sub>** The quantity of organic solvents which remains as contamination or residue in products output from the process/activity.
- O<sub>4</sub>** Uncaptured emissions of organic solvents to air. This includes the general ventilation of rooms, where air is released to the outside environment via windows, doors, vents and similar openings.
- O<sub>5</sub>** Organic solvents and/or organic compounds lost due to chemical or physical reactions (including for example those which are destroyed, e.g. by thermal oxidation or other waste gas or waste water treatments, or captured, e.g. by adsorption, as long as they are not counted under **O<sub>6</sub>**, **O<sub>7</sub>** or **O<sub>8</sub>**).
- O<sub>6</sub>** Organic solvents contained in collected waste.
- O<sub>7</sub>** Organic solvents, or organic solvents contained in mixtures, which are sold or are intended to be sold as a commercially valuable product.
- O<sub>8</sub>** Organic solvents contained in mixtures recovered for reuse but not as input into the process/activity, as long as not counted under **O<sub>7</sub>**
- O<sub>9</sub>** Organic solvents released in other ways

**Figure 1 - Solvent management plan inputs and outputs**





# **Explanatory Notes and Appeals Procedure**

Waveney District Council  
The Pollution Prevention Control Act 1999  
Environmental Permitting (England & Wales) Regulations 2016

## EXPLANATORY NOTE

***These notes are provided for the operator of an installation or mobile plant to assist in the interpretation of their duties under the provisions of the above-mentioned legislation, with particular reference to the permit issued by Waveney District Council. These notes do not form part of the Permit or conditions attached to it.***

### 1. **BEST AVAILABLE TECHNIQUES**

Aspects of the operation of the installation which are not regulated by conditions of the Permit are still subject to the Operator using 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 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 'BAT' is! In determining 'BAT', the Operator should pay particular attention to relevant sections of the Process Guidance Notes **6/34(11) – Re-spraying of road vehicles and 6/47(11) – Original coating of road vehicles and trailers**

### 2. **STATUTORY REQUIREMENTS**

This Permit is issued under Regulation 13 of the Environmental Permitting (England & Wales) Regulations 2016 and does not detract from any of the following statutory requirements where applicable:-

- (a) The requirement to obtain Planning Permission for the installation and any new construction.
- (b) The requirement to obtain discharge consent from the Environment Agency.
- (c) The requirement to obtain Building Regulation approval for any construction work.
- (d) The requirement of a Waste Disposal Licence.
- (e) The requirement to comply with the Health and Safety at Work etc Act 1974.

### 3. **PUBLIC REGISTER**

The Council is required 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 the Council Office.

Subject to exclusions of commercially confidential information and information affecting national security, registers contain the following:

- a. Applications for a permit;
- b. Notices asking for information and responses to such;
- c. Advertisements and representations in response to such (unless requested not to by the person responding)
- d. In the case of c) above, a statement to the effect that representations were made but have been omitted – must not identify the person making the representation;
- e. Statutory consultee responses to applications or applications for variations;
- f. Permits;
- g. Notifications of changes in the operation of installations;
- h. Applications for variations, transfers or surrenders of permits;
- i. Variations, transfers and surrenders granted;
- j. Revocations;
- k. Enforcement or suspension notices;
- l. Notices withdrawing enforcement and suspension notices;
- m. notice of an appeal including the grounds of the appeal, relevant correspondence between the appellant and the regulator, and the decision/notice which is the subject of the appeal;
- n. Representations in response to appeal (unless requested not to by the person responding);
- o. In the case of n) above, a statement to the effect that representation were made but have been omitted – must not identify the person making the representations;
- p. The appeal decision and any accompanying report;
- q. Convictions, formal cautions; to include the name of the person, date of conviction/caution, and (where appropriate) penalty and name of court. This requirement does not override the Rehabilitation of Offenders Act 1974 regarding spent conditions, and authorities must take care to remove relevant entries at the appropriate time;
- r. Monitoring data obtained by the authority from its own monitoring, or sent to the authority on accordance with a permit condition;
- s. If any monitoring information is omitted because it is commercially confidential, the authority must put a statement on the register indicating whether relevant permit conditions are being complied with, based on the withheld information;

### **Commercial Confidentiality**

An operator may request certain information to remain confidential i.e. not be placed on the public register. The operator must request the exclusion from the public register of commercially confidential information at the time of supply of the information requested by this notice or any other notice. The operator should provide clear justification for each item wishing to be kept from the register. The amount of information excluded from the register should be kept to the minimum necessary to safeguard the operator's commercial advantage. The general principle is that information should be freely available to the public. Information that maybe considered commercially confidential is that which if it “were being contained within the register would prejudice to an unreasonable degree the commercial interests of an individual or any other person” (Regulation 51 (2)) of the 2016 Regulations).

The Council will also take into account whether the information at issue could be obtained or inferred from other publicly accessible sources. It will determine this request within 28 days of the date of such an application and will issue a Determination Notice detailing their decision. The notice may specify a time period over which the information is to remain commercially confidential (if not specified, it will be four years beginning with the date of the determination). The operator may appeal to the Secretary of State within 21 days of the notification of the decision.

If the application is granted the Council will place a statement on the public register stating that certain information has been withheld and stating the reasons why, plus whether this information is relevant to a permit condition, and whether the permit condition has been complied with.

Further guidance on commercial confidentiality can be found in Chapter 8 of the LA-IPPC and LAPPC manual.

### **National Security**

Information may be excluded from the public register on the grounds of National Security. If it is considered that the inclusion of information on a public register is contrary to the interests of national security, the operator may apply to the Secretary of State, specifying the information and indicating the apparent nature of risk to national security. The operator must inform the local authority of such an application, which will not include the information on the public register until the Secretary of State has decided the matter.

### **4. FEES**

An application fee has been paid for this permit. In accordance with Regulation 66 of the 2016 Regulations the holder of a permit is required to pay an annual subsistence charge, which is subject to variation by Central Government. This charge is payable to this Council to ensure this Permit remains in force. An invoice will be sent for the appropriate subsistence charge each year.

### **5. TRANSFER OF PERMITS**

Under the provisions of Regulation 21 of the 2016 Regulations, where you wish to transfer the Permit to another person (the proposed transferee) then the operator and the proposed transferee shall jointly make an application to the Council. The council will determine the transfer application providing it considers that the proposed holder will be the person who will have control over the operation of the installation and will ensure compliance with the conditions of the transferred Permit. A fee is also available. For further details on this please contact the Council.

### **6. PROCESS CHANGES**

This Permit may be varied by the Council in future to take in changes recommended within updated Process Guidance notes. If at any time the process or any aspect of the activity regulated by this permit changes such that the conditions no longer reflect the activity and

require alteration. You must notify the Environmental Protection Team at Waveney District Council. The 'Provenance/Status Log' within the introductory note will include summary details of each permit variation date issued.

If the change could result in a breach of the existing permit conditions or is likely to require a SUBSTANTIAL CHANGE to the installation you will be required to submit an application and pay the relevant fee. You should notify the Council 14 days before undertaking any such changes in the installation operation. If you have any doubt as to the changes being substantial you should seek the opinion of the Council before you proceed with application.

## **7. SURRENDER OF THE PERMIT**

Where an Operator intends to cease the operation of an installation (in whole or in part) the Environmental Protection Team at Waveney District Council should be informed in writing, such notification must include the information specified in Regulation 24 or 25 of the 2016 Regulations.

## **8. APPEALS**

Anyone who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State for the Environment. Appeals must be made in accordance with the requirements of Regulation 31 and Schedule 6 of the Environmental Permitting (England and Wales) Regulations 2016. The right to appeal does not apply in circumstances where a notice implements a Direction of the Secretary of State given under Regulations 61 or 62 or a direction or when determining an appeal.

**Appeals must be received by the Appeal Body at the following address no later than 2 months from the date of the Notice being appealed against.**

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

Tel: 0303 444 5000  
email: [enquiries@pins.gsi.gov.uk](mailto:enquiries@pins.gsi.gov.uk)

If an appeal is made, the main parties will be kept informed about the next steps, and will also normally be provided with additional copies of each other's representations.

To withdraw an appeal, which may be done at any time, the appellant must notify the Planning Inspectorate in writing and copy the notification to the local authority who must in turn notify anyone with an interest in the appeal.

The appeal must be in the form of a written notice or letter stating that the person wishes to appeal against the conditions of the Permit. The following items must be included:-

- a written notice;
- 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 hearing;
- a copy of the 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.
- a statement indicating whether the appellant wishes the appeal to be in the form of a hearing or dealt with by way of written representations.

Appellants should state whether any of the information enclosed with the appeal has been the subject of a successful application for commercial confidentiality under Regulation 48 of the Environmental Permitting (England and Wales) Regulations 2016, and provide relevant details, see below. Unless such information is provided, all documents submitted will be open to inspection.

**An appeal will not suspend the effect of the Permit or its conditions, the Permit must still be complied with.**

### **Apportioning Costs**

Guidance from the Planning Inspectorate states that operator and regulator would be normally expected to pay their own expenses during an appeal. Where a hearing or enquiry is held as part of the appeal process, by virtue of paragraph 5(6) of Schedule 6 of the Environmental Permitting (England and Wales) Regulations 2016, either the appellant or the local authority can apply for costs. Applications for costs are normally heard towards the end of the proceedings and will only be allowed if the party claiming them can show that the other side behaved unreasonably and put them to unnecessary expense. There is no provision for costs to be awarded where appeals are dealt with by written representatives.

## **9. Secretary of State's Guidance**

| <b><u>Specific Guidance</u></b>  | <b><u>Web site details</u></b>  |
|--|---|
| <b>PG 6/47 (11), Secretary of State's Guidance<br/>– <i>Original coating of road vehicles and trailers</i></b> | <a href="http://webarchive.nationalarchives.gov.uk/20141106094453/http://www.defra.gov.uk/industrial-emissions/files/6_47-Final-June-2014.pdf">http://webarchive.nationalarchives.gov.uk/20141106094453/http://www.defra.gov.uk/industrial-emissions/files/6_47-Final-June-2014.pdf</a> |
| <b>PG 6/34 (11), Secretary of State's Guidance<br/>– <i>Re-spraying of road vehicles</i></b>                   | <a href="http://webarchive.nationalarchives.gov.uk/20141106094436/http://www.defra.gov.uk/industrial-emissions/files/6_34-Final-July-2013.pdf">http://webarchive.nationalarchives.gov.uk/20141106094436/http://www.defra.gov.uk/industrial-emissions/files/6_34-Final-July-2013.pdf</a> |

| <u>General Guidance</u>   | <u>Web site details</u>   |
|---|---|
| General Guidance Manual on Policy and Procedures for A2 and B Installations | <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/211863/env-permitting-general-guidance-a.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/211863/env-permitting-general-guidance-a.pdf</a> |
| Environmental Permitting (England & Wales) Regulation 2016                  | <a href="https://www.legislation.gov.uk/uksi/2016/1154/contents/made">https://www.legislation.gov.uk/uksi/2016/1154/contents/made</a>   |
| Pollution Prevention and Control Act 1999                                   | <a href="https://www.legislation.gov.uk/ukpga/1999/24/contents">https://www.legislation.gov.uk/ukpga/1999/24/contents</a>   |

#### 10. Reporting Requirements and Contact Details

Where a Permit condition imposes a requirement to forward documents to the Local Authority or to report a specified occurrence the following address and telephone number shall be used:

##### By Post:

Environmental Protection Team  
Waveney District Council,  
Riverside  
4 Canning Road  
LOWESTOFT  
Suffolk  
NR33 0EQ

##### By Telephone:

During office hours:      01502 562111  
Out of Hours:              01502 527132  
Fax:                              01502 523150

##### By Email:

[environment@eastssuffolk.gov.uk](mailto:environment@eastssuffolk.gov.uk)