



Permit with introductory note

**Environmental Permitting (England and Wales)
Regulations 2007**

Installation address

**Accident Repair Centre
Icknield Way East
Letchworth Garden City
Hertfordshire
SG6 1EX**

Permit Reference: EPA/00882/03/P2



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Contact Details:

North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

Tel: 01462 474000

Fax: 01462 474546

www.north-herts.gov.uk

**Martin Cranfield
Associates Ltd**

This Permit has been drafted by Martin Cranfield Associates Limited who are working on behalf of the Local Authority. Any queries regarding the content of this document should be addressed first to Martin Cranfield (Martin@cranfieldassociates.co.uk) on 01825 767686, Fax: 01825 768687. Suite 3 Quarry House, Mill Lane, Uckfield East Sussex TN22 5AA



Introductory note

This introductory note does not form a part of the Permit

The following Permit is issued under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2007 (S.I.2007 No. 3538) (“the EP Regulations”) to operate an installation carrying out one or more of the activities listed in Part B to Schedule 1 of those Regulations, to the extent authorised by the Permit.

The Permit includes conditions that have to be complied with. It should be noted that aspects of the operation of the installation which are not regulated by specific conditions are subject to the Best Available Techniques condition placed in the permit, that the Operator shall use the best available techniques for preventing or, where that is not practical, reducing emissions from the installation.

Please note techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Brief description of the installation regulated by this permit

Installation for the Respraying of Road Vehicles as prescribed by Section 6.4 Part B (b) of Schedule 1 to the Environmental Permitting (England and Wales) Regulations 2007, utilising the plant detailed in Schedule A.

Superseded Licences/Consents/Permits relating to this installation		
Holder	Reference Number	Date of Issue
Accident Repair Centre	EPA/00882/03	27 November 1996
Mrs Susan Majilath Trading As Accident Repair Centre	EPA/00882/03/P1	11 April 2005

Confidentiality

The Permit requires the Operator to provide information to North Hertfordshire District Council. The Council will place the information onto the public registers in accordance with the requirements of the EP Regulations. If the Operator considers that any information provided is commercially confidential, it may apply to North Hertfordshire District Council to have such information withheld from the register as provided in the EP Regulations. To enable North Hertfordshire District 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

Your Attention is drawn to the Variation Notification Procedure condition in 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 Regulator should be contacted.



Surrender of the permit

Where an Operator intends to cease the operation of an installation (in whole or in part) the regulator should be informed in writing, such notification must include the information specified in Regulation 24 for a Part B, Part A2 of Section 5.1 or mobile plant permit, within Schedule I and in accordance with Regulation 25 of the EP Regulations for all other Installations (Part A2).

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 EP Regulations. A transfer will be allowed unless the Authority 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 EP regulations. It must not be taken to replace any responsibilities you may have under Workplace Health and Safety legislation.

Appeal against permit conditions

Anyone who is aggrieved by the conditions attached to a Permit can appeal to the Appropriate Authority, (Secretary of State for the Environment, Food and Rural Affairs, in England and the Welsh Ministers in Wales) 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 or the Welsh Ministers at the following addresses:

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

Or for appeals in Wales:

The Planning Inspectorate
Crown Buildings
Cathays Park
CARDIFF
CF10 3NQ

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 local authority either to vary any of these other conditions or to add new conditions.

End of introductory note



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**Permit issued under the Environmental Permitting
(England and Wales) Regulations 2007**

Permit

Permit Number: EPA/00882/03/P2

North Hertfordshire District Council (the Regulator) in exercise of its powers under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2007(S.I. 2007 No. 3538) hereby permits:

Mrs Susan Majilath
Trading As Accident Repair Centre (the operator"),

Whose principal office is:

Icknield Way East
Letchworth Garden City
Hertfordshire
SG6 1EX

To operate an installation at

Accident Repair Centre
Icknield Way East
Letchworth Garden City
Hertfordshire
SG6 1EX

to the extent authorised by and subject to the conditions of this Permit and within the boundary identified in condition 3.2.

Signed

Jenny Mitchell
Authorised to sign on behalf of
North Hertfordshire District Council

Dated



CONDITIONS

EXTENT AND LIMIT OF THE INSTALLATION

1. Variation Notification Procedure

- 1.1 If the operator proposes to make a change in operation of the installation, he 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.

2. Best Available Technique

- 2.1 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.

3. The Permitted Installation

- 3.1 The Operator is authorised to carry out the activities and/or the associated activities specified in Table A.

Activities under Schedule 1 of the Regulations/ Associated activities	Description of specified activity	Schedule 1 activity reference (if applicable)	Limits of specified activity
Storage and handling of raw materials.	Storage of paints and solvents.	Directly associated activity.	Receipt and storage of raw materials.
Preparation activities.	Preparation of vehicles including sanding and grinding activities.	Directly associated activity.	Preparation activities within the site boundary and buildings outlined in condition 3.2 below only.
Respraying of road vehicles.	Spraying of road vehicles.	6.4 Part B(b).	Spraying utilising the spray booths specified in Schedule A only.
Storage and handling of solid and liquid wastes.	Storage of waste solvents and paint including recycling of solvent.	Directly associated activity.	From separation of waste to dispatch from installation.

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3.2 The operator is authorised to carry out the activities and/or associated activities as specified under condition 3.1 and within the boundary shown edged in red on the plan below: -

Site Plan





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4. Emission Limits, monitoring and other provisions

Non-VOC provisions

4.1 The installation shall comply with the emission limits in Table B below.

Table B Emission Limits				
Substance	Source	Emission limits/provisions	Type of monitoring	Monitoring frequency
Particulate matter	From spray booths	10 mg/Nm ³	By guarantee supplied by spray booth constructor or equipment supplier (with appropriate test evidence) or Manual Extractive testing in accordance with BS –EN 13284 (above 20mg/m ³ BS-EN 9096 2003) (where not internally vented.)	On initial installation, refurbishment or replacement
	Abrasive blasting equipment and other sources except spray booths	50 mg/Nm ³		
Sulphur Dioxide	All processes/ activities, including gas oil for spray-booths.	0.1% wt/wt sulphur in fuel	Certification by supplier using test method ASTM D86 distillation	Every delivery

4.2 Natural gas shall be the fuel used for the spray booths listed in Schedule A.

VOC Compliant Coatings

4.3 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 that are covered by this permit are listed in Appendix 4 of Process Guidance Note 6/34b (06).

4.4 The maximum content of volatile organic solvents in the coating materials, as applied and used for the surface preparation and painting operations shall not exceed the limits set out in Schedule B.

4.5 The products used in coating shall be prepared and applied in accordance with the suppliers' instructions. Under no circumstances shall the product be thinned with more than the supplier's stated quantity or percentage of thinner.

Monitoring and investigation recording

4.6 The Operator shall keep a record (logbook) of all inspections, tests and monitoring including non-continuous monitoring, inspections and visual assessments. Current records shall be kept on site and be available for inspection by the regulator. Records shall be kept for at least two years.

4.7 A detailed record shall be kept of all paint, hardener, organic solvent and substrate and equipment cleaning materials used, in accordance with Table D. The record shall be kept in such a way that the total organic solvent usage can be determined, and this determination shall be made annually. The figure obtained shall be made available to the regulator upon



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request. (To make the determination, knowledge of the organic solvent content of all products purchased will be needed).

Visible and odorous emissions

- 4.8 Emissions from any combustion process shall be free from visible smoke in normal operation and in any case shall not exceed the equivalent of Ringelmann Shade 1 as described in BS2742:1969.
- 4.9 All releases to air, other than condensed water vapour, shall be free from persistent visible emissions.
- 4.10 All emissions to air shall be free from droplets.
- 4.11 There shall be no offensive odour beyond the site boundary, as perceived by the Regulator.

Abnormal events

- 4.12 Where abnormal emissions, malfunctions or breakdowns leading to abnormal emission occur the operator shall:
 - 4.12.1 investigate immediately and undertake corrective action
 - 4.12.2 adjust the process or activity to minimise those emissions; and
 - 4.12.3 promptly record (within one working day) the events and actions taken
- 4.13 The regulator shall be informed without delay if there is an emission that is likely to have an effect on the local community.

5. Control Techniques

VOC and odour control storage

- 5.1 All potentially odorous waste materials shall be stored in suitable closed containers or bulk storage vessels and where appropriate vented to suitable arrestment plant.

VOC control and handling

- 5.2 Coatings containing volatile organic compounds (including thinners and gunwash) shall be stored:
 - 5.2.1 in the containers in which they were supplied, with the lid securely fastened at all times other than when in use,
 - 5.2.2 within spillage collectors, of suitable impervious and corrosion-proof materials and capable of containing 110% of the largest container,
 - 5.2.3 away from sources of heat.

Spray Booths

- 5.3 All paint spraying operations, excluding spraygun testing and sprayout following spraygun cleaning, shall be undertaken utilising the spray booths as specified in Schedule A.
- 5.4 The totally enclosed spray booths specified in Schedule A shall operate under negative pressure only. The pressure operated automatic shutdown mechanism associated with each



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spray booth shall be maintained in working order to ensure that spray operations cannot be undertaken in the event of positive pressure.

- 5.5 All spray gun testing (excluding colour match testing) and spray-out following cleaning shall be done into the equipment cleaning machine specified in Schedule A with the extraction running, or into a separate 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. A receptacle shall be used to collect the organic solvent which is put through the spraygun. When not in use, the receptacle shall be lidded to prevent evaporation and fugitive emission of organic solvent vapour. The operator shall inform the Council in writing of any significant changes to the written procedure.

VOC control; cleaning

- 5.6 All spray gun cleaning and equipment (of suitable dimensions) cleaning shall be carried out in the equipment cleaning machine specified in Schedule A. The cleaning machine shall be provided with the minimum of 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.
- 5.7 The application of cleaning solvents onto cleaning cloths shall be by piston type dispenser, and pre impregnated wipes shall be held within an enclosed container prior to use.
- 5.8 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.
- 5.9 Every two years, from the date of this permit, all cleaning operations involving the use of organic solvents shall be reviewed to identify opportunities for the reduction of VOC. The operator shall provide the regulator with a report on the conclusions of the review, within 8 weeks of it being completed.

VOC control; operational

- 5.10 Spray coatings shall be applied using high volume low pressure (HVLP) spraying equipment with a maximum atomisation pressure of 67.5 kPa (10 psi) which shall be operated according to manufacturer's instructions.

VOC control; waste

- 5.11 All solvent containing wastes shall be stored:
- 5.11.1 in suitable sealed containers with a securely fastened lid, and labelled so that all that handle them are aware of their contents.
 - 5.11.2 contained by spillage collectors, of suitable impervious and corrosion-proof materials and capable of containing 110% of the largest container.
 - 5.11.3 away from any surface or foul water drains.
 - 5.11.4 away from sources of heat.
- 5.12 Empty tins containing solvent-based material shall be lidded or drained and dried.
- 5.13 Dirty solvent and waste paint shall be recycled off site and copies of all receipts of waste materials sold for recycling shall be kept for a period of 3 years.



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*Note: It is advised that materials that may undergo spontaneous combustion are stored in special bins that allow air to circulate beneath and around them to aid cooling or other bins specifically designed for this purpose.

Dust and spillage control

- 5.14 All preparation activities likely to give rise to odours, fume or particulate matter, shall be undertaken within the body shop. All activities likely to give rise to airborne particulate matter shall be undertaken utilising a local dust extraction system specified within Schedule A.
- 5.15 Suitable organic solvent containment and spillage equipment shall be available in all organic solvent handling areas.
- 5.16 Dusty wastes shall be stored in closed containers.
- 5.17 Dry sweeping of dusts and dusty wastes shall not be used.

Air Quality

Dispersion and dilution from stack

- 5.18 The discharge height of the stacks serving the spray booths venting externally shall not be less than 3m above the roof ridge height of any building within 15m of the base of the chimney or vent or a height determined by using D1 (HMIP Technical guidance note D1 Guidelines on Discharge Stack Heights for Polluting Emissions”).
- 5.19 The efflux velocities for the spray booths venting externally and specified in Schedule A shall be such as to prevent the discharged plumes being affected by aerodynamic down wash.
- 5.20 The discharge stack fitted to each spray booth shall discharge vertically upwards and shall not be fitted with any restriction at the final opening such as a plate, cap or cowl.

Management

Appropriate management systems

- 5.21 Staff at all levels shall receive the necessary training and instruction in their duties relating to the control of the process emissions to air. Training shall include:
 - 5.21.1 Awareness of their responsibilities under the permit.
 - 5.21.2 Minimising emissions on start up and shutdown.
 - 5.21.3 Action to minimise emissions during abnormal conditions.
- 5.22 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 and sent to the Council on 31st January every year.
- 5.23 Effective preventative maintenance shall be employed on all plant and equipment concerned with the control of emissions to air. A written maintenance programme shall be drafted and implemented for the spray booths and shall include the maintenance, inspection and replacement of the air extraction filters within the booth. The programme shall be made available to the regulator on request. The operator shall inform the Council in writing of any significant changes to the programme.



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- 5.24 Either essential spares and consumables shall be held for all arrestment plant, or alternatively;
 - 5.24.1 A service contract for the arrestment plant, which includes a priority attendance requirement for arrestment plant failure, shall be held with a suitable contractor;
 - 5.24.2 The company shall employ a mobile service and repair engineer carrying essential spares and consumables.

End of conditions

SCHEDULE A

Table C	
Plant	Description
Spray booth	Spraybake Booth (Serial No. BS61182)
Spray booth	Burntwood Booth (Serial No. 41386)
Gun wash/ cleaning equipment	SafetyKleen
Dust Extraction system	Sealey Mobile Dust Extraction Units



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SCHEDULE B

The compliant coatings are listed below. In relation to each of the following coatings, compliance is achieved if coating as applied contains less VOC in g/l than specified in Table D.

Table D			
All Processes/activities			
Row	Volatile Organic Compounds	Recording	
1	Compliant Coatings	A record shall be kept of all paint, hardener, organic solvent and substrate and equipment cleaning materials used. The record shall state the total organic solvent usage.	
	Compliant coatings shall be used.		
	The maximum content of organic solvents (in grammes per litre) which may be present in the coating as applied shall not exceed the amounts specified below. All values are maxima, not averages, and guidance on the functions of the materials listed is given in Section 8 Definitions and Further Information.		
	The measurement of volatile organic compounds contents of coatings shall be undertaken in accordance with Section 9 , with the exception of precleaner, whose volatile organic content should be determined as grammes of solvent per litre of material <i>including water</i> .		
	Product		g/l
	Gunwash		850
	Precleaner		200
	Wash primer (a)		780
	Precoat		540
	Primer surfacer		540
	Non-sand surfacer		540
	Primers for wet-on-wet topcoat application		540
	Topcoats:		
	1-coat conventional		420
	2-coat base and clear (b)		420
3-coat topcoat systems (b)	420		
Special products (c)	840		
See Section 9 (about compliant coatings) for notes (a)-(c).			

Reproduced from Process Guidance Note PG 6/34 (B) (06) Secretary of States Guidance for Respraying of Road Vehicles available at <http://www.defra.gov.uk/environment/ppc>.

End of Permit