

# Permit With Introductory Note



The Pollution Prevention and Control Act 1999  
The Environmental Permitting (England and Wales) Regulations 2010  
(as amended)

**K R Rackham & Sons**  
**47 Boss Hall Road**  
**Ipswich**  
**IP1 5BN**

LAPPC Permit Ref no:  
**EP23/4/LB**

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## Chronicle

<b>Detail</b>	<b>Date</b>	<b>Comments</b>
First Authorised	23.08.93	6.5/5/CFB
Notice Requiring Information	15.02.95	6.5/1/RC
Variation Notice	23.03.95	6.5/5/V1
Variation Notice	20.08.98	6.5/5/V2
Variation Notice	01.04.04	Duly Made
LAPC Deemed Application	05.05.04	6.4/RJD/2
Temporary Permit	08.02.06	6.4/RJD/2/05
Consultation Permit	26.04.06	1.2/SR/02/06
Varied permit	01.11.12	EP23/3
Variation Notice	14.01.14	201310370
Varied Permit	14.01.14	EP23/4/LB

Permit issued by:

Environmental Health  
Ipswich Borough Council  
Floor 3 West  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

Telephone: 01473 433115  
Fax: 01473 433062  
Website: [www.ipswich.gov.uk](http://www.ipswich.gov.uk)  
Email: [environmentalprotection@ipswich.gov.uk](mailto:environmentalprotection@ipswich.gov.uk)

## **INTRODUCTORY NOTE**

### ***This introductory note does not form part of the permit***

The following Permit is issued under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010, as amended, to operate a scheduled installation carrying out an activity, or activities covered by the description in section 7 in Part 2 to Schedule 1 of the EP regulations, to the extent authorised by the Permit.

Conditions within this Permit detail Best Available Techniques (BAT), for the management and operation of the installation, to prevent, or where that is not practicable, to reduce emissions.

In determining BAT, the Operator should pay particular attention to relevant sections of the Secretary of State's Process Guidance Note PG6/34(11) Statutory guidance for re-spraying of road vehicles Revised: July 2013, and any other relevant guidance. Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Note that the Permit requires the submission of certain information to the Regulator, and in addition, the Regulator has the power to seek further information at any time under Regulation 60 of the EP Regulations provided that the request is reasonable.

### **Public Registers**

Information relating to Permits, including the application, is available on public registers in accordance with the EP Regulations. Certain information may be withheld from the public registers where it is commercially confidential, or if it is in the interest of national security to do so.

### **Variations to the Permit**

The Regulator may vary the permit in the future, by serving a variation notice on the Operator. Should the Operator want any of the conditions of the Permit to be changed, a formal application must be submitted to the Regulator (the relevant forms are available from the Regulator). The Status Log that forms part of this introductory note will include summary details of this Permit, variations issued up to that point in time and state whether a consolidated version of the Permit has been issued.

### **Transfer of the Permit or Part of the Permit**

Before the Permit can be wholly or partially transferred to another Operator, an application to transfer the Permit has to be made jointly by the existing and proposed Operators. A transfer will not be approved if the Regulator is not satisfied that the proposed Permit holder will be the person having control over the operation of the installation, or will not comply with the conditions of the transferred Permit. In addition, if the Permit authorises the Operator to carry out a specified waste management activity, the transfer will not be approved if the Regulator does not consider the proposed Permit holder to be a 'fit and proper person' as required by the EP Regulations.

### **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(3) of the EP Regulations.

### **Responsibility under Workplace Health and Safety Legislation**

The permit is given in relation to the requirements of the EP Regulations. It must not be taken to replace any responsibilities an Operator may have under the workplace health and safety legislation.

**IPSWICH BOROUGH COUNCIL**  
**POLLUTION PREVENTION AND CONTROL ACT 1999**  
**Environmental Permitting (England and Wales) Regulations 2010 (as amended)**

Permit Ref No. EP23/4/LB

**Name and address of person (A) authorised to operate the installation ('the operator')**

K R Rackham & Sons, 47 Boss Hall Road, Ipswich, IP1 5BN

**Registered number and office of company**

K R Rackham & Sons, 47 Boss Hall Road, Ipswich, IP1 5BN

**Address of permitted installation (B)**

K R Rackham & Sons, 47 Boss Hall Road, Ipswich, IP1 5BN

Signature:



Sara Boyles

Date: 14<sup>th</sup> January 2014

Principle Environmental Health Officer  
The Authorised Officer for this purpose

Permit issued by:

Environmental Health  
Floor 3W  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

Telephone: 01473 433115  
Fax: 01473 433062  
Website: [www.ipswich.gov.uk](http://www.ipswich.gov.uk)  
Email: [environmentalprotection@ipswich.gov.uk](mailto:environmentalprotection@ipswich.gov.uk)

The installation boundary and key items of equipment mentioned in permit conditions are shown in the plans attached to this permit.

**Activity description**

Vehicles (or parts thereof) are prepared using an orbital sander with dust extraction and/or hand held sandpaper. The surface is cleaned and then sprayed with a zinc based primer is mixed with thinners and added to the container of the air fed High Volume Low Pressure spray gun. Once dry, the parts are sprayed with water based paints and bakes at 60°C until dry.

The major plant items comprise of two spraybake 5900W spray booths and one spraybake M1000W spray which discharge filtered emissions at 9 metres from ground level.

The burners heating the air for these ovens are natural gas fired and exhaust at a height of 7 metres. All aforementioned exhausts are in vertical chimneys ducted through the building roof.

The spray gun cleaning and mixing room areas are ventilated and emissions from here are discharged through a wall vent at a height of 2.9 metres.

The solvent store also houses a solvent recycling machine. The area is ventilated by four wall vents, two at heights of 0.5 metres and two at heights of 2 metres.

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

**Conditions**

**Non-VOC emissions**

Table I – The following non-VOC emission limits shall apply:

<b>Substance</b>	<b>Source</b>	<b>Emissions limits/ provisions</b>	<b>Type of Monitoring</b>	<b>Monitoring Frequency</b>
Particulate matter	From spray booths	10mg/Nm <sup>3</sup>	By guarantee supplied by spray booth constructor (with appropriate test evidence)	None required
	Abrasive blasting equipment and other sources except spray booths	50mg/Nm <sup>3</sup>	Manual extractive testing in accordance with BS 6069:section 4.3 1992	In accordance with the written plan

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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		

The reference conditions for limits in this permit are 273.15K, 101.3Kfa, without correct for water vapour content.

1. 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. The operator shall implement a maintenance schedule a copy of which shall be made available to the regulator upon request. The operator shall inform the Council in writing of any significant changes to the schedule.
3. Dusty wastes shall be stored in closed containers.
4. Dry sweeping of dusts and dusty wastes shall not be undertaken.
5. 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
6. 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.
7. Within 8 weeks of the completion of monitoring activities, the results of non-continuous emission testing shall be forwarded to the regulator.
8. 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
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 regulator without delay, if the emission is likely to have an effect on the local community

### **VOC emissions**

10. 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 3 of Process Guidance Note 6/34 (11).
11. 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. For information, the maximum, application-ready VOC contents for individual categories of products are listed in Appendix 4 of Process Guidance Note 6/34 (11).
12. All paint spraying operations shall be carried out in a totally enclosed booth under negative pressure, to prevent fugitive emissions of VOCs.
13. Spray applied coatings shall be applied to passenger cars using the following method:
- high volume low pressure (HVLP) (maximum atomisation pressure 67.5kPa) spraying equipment
14. Spray applied coatings shall be applied to commercial vehicles using one of the techniques in Condition 3.5 of PG6/34(11) or using airless spraying equipment.
15. 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.
16. All spray gun testing and sprayout following cleaning shall be carried out in either an equipment cleaning machine with the extraction running or into a chamber which is provided with extraction 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.
17. Cleaning solvents shall be dispensed by a piston type dispenser or similar contained device, when used on wipes.

18. Pre-impregnated solvent wipes shall be held within an enclosed container prior to use.
19. 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.
20. Organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas.
21. 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 sources of heat.
22. All solvent containing wastes shall be stored:
  - in suitable sealed containers with a securely fastened lid, and labelled so that all that handle them are aware of their contents;
  - within spillage collectors, of suitable impervious and corrosion-proof materials and capable of containing 110% of the largest container;
  - away from sources of heat.
23. 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.
24. Spares and consumables, particularly those subject to continual wear shall be held on site, or shall be available at short notice from guaranteed suppliers, so that spraybooth and abrasive blasting plant breakdowns can be rectified rapidly.
25. 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**

26. All releases to air, other than condensed water vapour, shall be free from persistent visible emissions.
27. All emissions to air shall be free from droplets.
28. There shall be no offensive odour beyond the site boundary, as perceived by the regulator.
29. 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



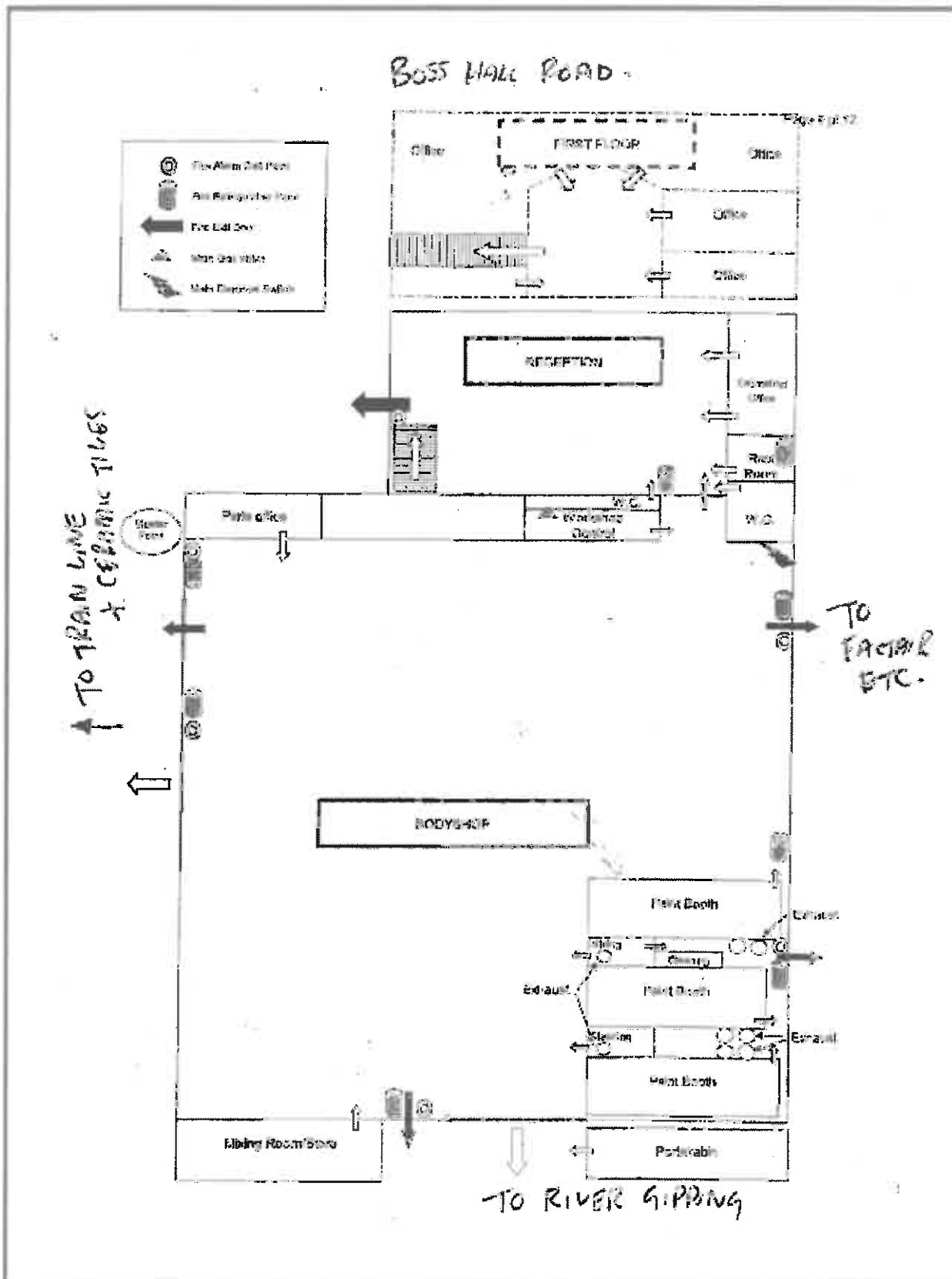
### **General Conditions**

30. All emissions from spray booths shall be emitted from the two chimneys. The stacks shall be 9.5m high.
31. The activity shall operate in accordance with the in house Environmental Management System which shall be made available for inspection when required by the operator.
32. Staff at all levels shall receive the necessary training and instruction at induction stage and periodically throughout their employment. This is part of Rackham's in house bespoke training programme.
33. 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 made available to the Council on request.
34. A written record of all maintenance carried out in accordance with Condition 2 shall be made available for inspection by the regulator

### **Right to Appeal**

You have the right of appeal against this permit within 6 months of the date of the decision. The Council can tell you how to appeal. You will normally be expected to pay your own expenses during an appeal. You will be liable for prosecution if you fail to comply with the conditions of this permit. If found guilty, the maximum penalty for each offence if prosecuted in a Magistrates Court is £50,000 and/or 6 months imprisonment. In a Crown Court it is an unlimited fine and/or 5 years imprisonment. Our enforcement of your permit will be in accordance with the Regulators' Compliance Code.

Plan of Site Layout



Site Location



