

Permit With Introductory Note

The Pollution Prevention and Control Act 1999
The Pollution Prevention and Control (England & Wales) Regulations 2000



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

LAPPC Permit Ref No: 6.4/RJD/2/05

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Chronicle

Detail	Date	Comments
First Authorised	23 rd August 1993	6.5/5/CFB
Notice Requiring Information	15 th February 1995	6.5/1/RC
Variation Notice	23 rd March 1995	6.5/5/V1
Variation Notice	20 th August 1998	6.5/5/V2
LAPC Deemed Application	1 st April 2004	Duly Made
Temporary Permit	5 th May 2004	6.4/RJD/2
Consultation Permit	8 th February 2006	6.4/RJD/2/05
Permit Issued	26 th April 2006	1.2/SR/02/06

Permit issued by:

Environmental Protection Services
Room 409
Ipswich Borough Council
Civic Centre
Civic Drive
Ipswich
IP1 2EE

Telephone: 01473 433115
Fax: 01473 433062
Website: www.ipswich.gov.uk
Email: environmentalprotection@ipswich.gov.uk

INTRODUCTORY NOTE

This introductory note does not form part of the permit

The following Permit is issued under Regulation 10 of the Pollution Prevention and Control (England and Wales) Regulations 2000, as amended, to operate a scheduled installation carrying out an activity, or activities covered by the description in sections 1.2B(d) in Part 1 to Schedule 1 of the PPC 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.

Aspects of the operation of the installation that are not regulated by conditions in this Permit are subject to BAT through the condition implied by regulation 12(10) of the PPC Regulations.

In determining BAT, the Operator should pay particular attention to relevant sections of the LAPPC Process Guidance note 6/3+(04), 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 28 of the PPC 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 PPC 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 PPC 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 20(3) of the PPC Regulations.

Responsibility under Workplace Health and Safety Legislation

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

Appeal Against Permit Conditions

Any person who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State for Environment, Food & Rural Affairs. Appeals must be received by the Secretary of State no later than 6 months from the date of the decision (the date of the Permit).

Appeals relating to installations in England should be received by the Secretary of State for Environment, Food & Rural Affairs. The address is as follows:

**The Planning Inspectorate
Environmental Appeals Administration
Room 4/19 - Eagle Wing
Temple Quay House
2 The Square
Temple Quay
Bristol, BS1 1PN**

The appeal must be in the form of a written notice or letter stating that the person wishes to appeal and listing the condition(s) which is/are being appealed against. The following five items must be included:

- (a) A statement of the grounds of appeal;
- (b) A copy of any relevant application;
- (c) A copy of any relevant Permit;
- (d) A copy of any relevant correspondence between the person making the appeal and the Council;
- (e) A statement indicating whether the appellant wishes the appeal to be dealt with.
 - by a hearing attended by both parties and conducted by an inspector appointed by the Secretary of State; or
 - by both parties sending the Secretary of State written statements of their case (and having the opportunity to comment upon one another's statements).

At the same time, the notice of appeal and documents (a) and (e) must be sent to the Council, and the person making the appeal should inform the appropriate Secretary of State that this had been done.

At the same time, the notice of appeal and documents (a) and (e) must be sent to the Council, and the person making the appeal should inform the appropriate Secretary of State that this has been done.

- An appeal 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 to either vary any of these conditions or to add new conditions.

Copyright of any Maps Provided with this Permit

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Talking to us

Please quote the Permit Number if you contact the Regulator about this permit. To give a notification, the Operator should telephone 01473 433012 or any other number notified in writing by the Regulator for that purpose.

~ End of Introductory Note ~

Permit

The Pollution Prevention and Control Act 1999
The Pollution Prevention and Control (England & Wales) Regulations 2000



LAPPC Permit Ref No: 6.4/RJD/2/05

Ipswich Borough Council in exercise of its powers under Regulation 10 of The Pollution Prevention and Control (England and Wales) Regulations, hereby authorises:

K R Rackham & Sons

Whose Registered Office is:

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

to operate an installation at:

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

to the extent authorised by and subject to the conditions of this Permit.

Signature:

Concepta Palk
Group Manager (Environmental Services)
The Authorised Officer for this purpose

Date:

Permit issued by:

Environmental Protection Services
Room 409
Ipswich Borough Council
Civic Centre
Civic Drive
Ipswich
IP1 2EE

Telephone: 01473 433115
Fax: 01473 433062
Website: www.ipswich.gov.uk
Email: environmentalprotection@ipswich.gov.uk

OPERATING CONDITIONS

Process Description

The process is carried out by K R Rackham & Sons at 47 Boss Hall Road Industrial Estate, Ipswich.

The attached plan 6.4/RJD/2/OJ/site plan 1 shows the site boundary of the premises.

The major plant items and areas comprise of two spraybake 5900W spray booths and one spraybake M1000W spray booths and one spraybake M1000W spray booth 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.

Attached site plan 6.4/RJD/2/OJ/site plan 2 shows the location of the spray booths and associated areas.

Emission limits, monitoring and other provisions

1. The reference conditions for limits in this permit are 273.15K, 101.3Kfa, without correct for water vapour content unless stated.
- 2.

Substance	Source	Emission limit/provisions	Type of Monitoring	Monitoring Frequency
Particulate matter	From spray booths	10mg/Nm ³	By guarantee supplied by spray booth construction or equipment supplier (with appropriate test evidence)	On initial installation, refurbishment or replacement
	Abrasive blasting equipment and other sources except spray booths	50mg/Nm ³	Manual extractive testing in accordance with BS ISO 9096:2003 (where not internally vented)	

3. The Operator shall only use "Compliant Coatings" as stipulated in Schedule 1 of this Permit.
4. An annual inventory of organic solvent usage for each year shall be submitted to Ipswich Borough Council. The inventory shall include:
 - (i) The total used solvent contained in coatings and materials used for cleaning or other purposes in grams per litre.
 - (ii) The total amount in grams per litre of solvents moved from the process for re-use or recovery for reuse.
 - (iii) The product details including manufacturer's proprietary name, the type of product, the percentage organic solvent content of each product and whether the product is a compliant or non-compliant material in accordance with condition 2.
5. The Operator shall review annually the use of organic solvents used at the installation to identify opportunities for reducing fugitive releases of VOCs.
6. The Operator shall keep records of inspections, tests and monitoring, including all non-continuous monitoring inspections and visual assessments. In each case:
 - (i) Current records shall be kept on site and made available for inspection by an authorised officer of Ipswich Borough Council.
 - (ii) Records shall be kept for at least two years.
7. There shall be a written plan for the maintenance, inspection and replacement of extract air filters.
8. The Operator shall notify Ipswich Borough Council at least 7 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 methods to be used.
9. Adverse results from any monitoring activity shall be investigated by the Operator as soon as the monitoring data has been obtained. The Operator shall:
 - (i) identify the cause and take corrective action,
 - (ii) record as much detail as possible regarding the cause and extent of the problem, and the action taken by the Operator to rectify the situation.
 - (iii) re-test to demonstrate compliance
 - (iv) notify Ipswich Borough Council
10. Emissions from combustion processes shall, in normal operation, be free from visible smoke and in any case shall not exceed the equivalent of Ringlemann Shade 1 as described in British Standard BS 2742:1969.

11. All releases to air, other than condensed water vapour, shall be free from persistent visible emissions.
12. All emissions to air shall be free from droplets.
13. There shall be no offensive odour beyond the site boundary, as perceived by an authorised officer of Ipswich Borough Council.
14. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions, the Operator shall:
 - (i) investigate immediately and undertake corrective action,
 - (ii) adjust the process or activity to minimise those emissions; and
 - (iii) promptly record the events and actions taken
15. All appropriate precautions shall be taken to minimise emissions during start-up and shut-down.
16. Non-continuous emissions monitoring of particulate matter shall be carried out according to the main procedural requirements of BS6069 : section 43 1992 (identical to ISO 9096 : 1992), with averages taken over operating periods excluding start-up, shutdown and periods with no spraying.

Control Techniques

17.

Release source	Substance	Control techniques
Storage and handling of organic solvents and materials containing organic solvents	VOC	Use of low organic solvent coating materials
		Use of low volatility organic solvent cleaning solutions
		Use of enclosed mixing and storage vessels
Coating operations	VOC, isocyanates, particulate matter	Spray booth enclosure, capture and disposal or capture and destruction
Flue gas	Sulphur oxides	Limit sulphur in fuel
	VOC	Efficient thermal oxidation
Preparation and use of isocyanate coatings	Isocyanates	As for VOC

Non VOC Releases Control Techniques

18. Emissions of particulate matter shall be abated if necessary to meet the emission limit.

VOC Control Techniques

19. All paint spraying operations shall be carried out in either one of the spraybake 5900W spray booths or the spraybake M1000W spray booth.
20. Each spray booth shall be fitted with a pressure gauge to ensure that the booth is not under positive pressure during spraying or baking operations.
21. Spray booths shall be (whilst in operation) under negative pressure so as to prevent fugitive emissions of odour and particulate matter.
22. Spray coating shall be applied to passenger cars by using one of the following methods:
 - (i) high volume low pressure (HVLP) (maximum atomisation pressure 67.5Kpa) spraying equipment;
 - (ii) air assisted airless spraying equipment;
 - (iii) electrostatic spraying equipment; or
 - (iv) alternatively, a system capable of achieving a transfer efficiency of at least 65%.
23. Coatings shall be applied to commercial vehicles by using one of the techniques in condition 22.
24. Paint mixing shall only be carried out in the area marked "mixing room" on the attached plan 6.4/RJD/2/05/site plan 2.
25. Spray gun testing and sprayout following cleaning shall be done into the equipment cleaning machine with the extraction running. A receptacle shall be provided to collect the organic solvent which is put through the spray gun.
26. All full, partially full and nominally empty containers which hold or have held materials or waste which contain organic solvents, shall be stored tightly lidded.
27. All spray guns and equipment cleaning shall be carried out in an automatic totally enclosed equipment cleaning machine. The cleaning machine shall be provided with an exhaust ventilation that can prevent the fugitive emission of organic solvent vapour when the machine is open for introduction or removal of equipment, or for the changing of cleaning solvent. The amount of exhaust ventilation will also be of concern under health and safety legislation.

28. Cleaning operations involving organic solvents shall be periodically reviewed, at least every two years, to identify opportunities for reducing VOC emissions. IBC shall be provided with a report on the conclusions.
29. A detailed record shall be kept of all paint, hardener, organic solvent and substrate and equipment cleaning materials used. 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. This shall be submitted to Ipswich Borough Council at least once per year.

General Control Techniques

30. Solvent soaked wiping cloths shall be held in enclosed containers after use. All arising of dry, dusty materials shall be stored in closed containers to prevent wind entrainment of such materials prior to removal from site.
31. A supply of absorbent material shall be held at site for use in the event of spillage of organic solvents. Such spillages shall be cleared up immediately and the collected material shall be held in an enclosed container, pending removal from site.
32. Dusty waste shall be stored in closed containers and handled in a manner that avoids emissions.
33. Dry sweeping of dusty materials shall not normally be permitted unless there are environmental or health and safety issues in using alternative techniques.
34. A high standard of housekeeping shall be maintained.
35. No operations which could lead to emission of odours, fume or particulate matter shall be carried out in a building.

Stacks, vents

36. Exhaust from the spraybooths shall be exhausted via two chimneys discharging 9.5 metres above ground level.
37. The efflux velocity of the spraybooth discharge vent shall not be less than 15 metres per second.
38. Stacks or vents shall not be fitted with any restriction at the final opening such as a plate, cap or cowl.

Management

39. The Operator shall be aware that important elements for effective control of emissions include:
- (i) proper management, supervision and training for process operations;
 - (ii) proper use of equipment;
 - (iii) effective preventative maintenance on all plant and equipment with the control of emissions to the air, and
 - (iv) it is good practice to ensure that spares and consumables are available at short notice in order to rectify breakdowns rapidly.
40. The Operator shall keep spares and consumables on site, in particular those subject to continual wear, or shall be available at short notice from a guaranteed supplier.
41. The Operator shall implement suitable and sufficient management systems to provide an effective technique for ensuring that all pollution prevention and control techniques (BAT) are delivered reliably and on an integrated basis.

Training

42. The Operator shall ensure staff at all levels need the necessary training and instruction in their duties relating to control of the process and emissions to air.
43. The Operator shall ensure the training of all staff with responsibility for operating the process shall include:
- (i) awareness of their responsibilities under the permit; in particular how to deal with conditions likely to give rise to VOC emissions.
 - (ii) minimising emissions on start up and shut down
 - (iii) action to minimise emissions during abnormal conditions.
44. The Operator shall maintain a statement of training requirements for each operational part and keep a record of the training received by each person whose actions may have an impact on the environment. These documents shall be made available to an authorised officer at Ipswich Borough Council at their request.