

Permit With Introductory Note

The Pollution Prevention and Control Act 1999

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



Simon Morris Ipswich Ltd
Unit H4, Bluestem Road
Ransomes Europark
Ipswich IP3 9RR

LAPPC Permit Ref No: 6.4/LK/1/07

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Chronicle

Detail	Date	Comments
First authorised	6 June 2003	6.5/14/CFB
Variation Notice	23 December 2003	6.5/14/V1
LAPPC Deemed Application	1 April 2004	Duly made
Temporary Permit	27 May 2005	3.4/RJD/5
Variation Notice	1 September 2005	6.4/RJD/5/V1
Consultation Permit	4 January 2006	6.4/RJD/5/05
Permit Issued	24 January 2006	6.4/RJD/5/05
Permit Transfer Application	7 th June 2007	Transfer Accepted
Permit Issued	18 th June 2007	6.4/LK/1/07

Permit issued by:

Environmental Protection Services
 Ipswich Borough Council
 4th Floor East
 15-17 Russell Road
 Ipswich
 IP1 2DE

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 6.4B(b) 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 6/34(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

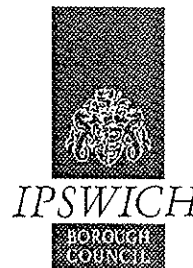
The Regulator may vary the permit in the future, by serving a variation notice on the Operator. Should the Operator want any of the conditions of the Permit to be changed, a formal application must be submitted to the Regulator (the relevant forms are available from the Regulator). The Status Log that 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.

Permit

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



LAPPC Permit Ref No: 6.4/LK/1/07

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

Whose Registered Office is:

**Simon Morris Ipswich Ltd
Unit H4
Bluestem Road
Ransomes Europark
Ipswich
IP3 9RR**

to operate an installation at:

**Simon Morris Ipswich Ltd
Unit H4
Bluestem Road
Ransomes Europark
Ipswich
IP3 9RR**

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

Signature:

**Steve Rock
Environmental Protection Services Manager
The Authorised Officer for this purpose**

Date: 14/6/07

Permit issued by:

**Environmental Protection Services
Ipswich Borough Council
4th Floor East
15-17 Russell Road
Ipswich
IP1 2DE**

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

OPERATING CONDITIONS

Process Description and General Information

This process is carried out by Simon Morris Ipswich Ltd at Unit H4, Bluestem Road, Ransomes Europark, Ipswich, IP3 9RR.

The attached plan 6.4/RJD/5/05, site plan 1 shows the site boundary of the premises.

The respraying of road vehicles is carried out solely within a purpose built spraybooth, which also acts as a drying oven. The booth is manufactured by Spraybrake Ltd. The booth is a Spraybrake Commercial Vehicle booth, Serial No: 3936 0396. fuelled by natural gas. Emissions from the booth are exhausted via one or both of the chimneys and discharged at a height of 12 metres above ground level.

The attached plan 6.4/RJD/5/05/site plan 2 shows the internal layout of the premises.

The attached plan 6.4/RJD/5/05/site plan 3 shows the location of the chimneys.

VEHICLE RESPRAYING

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 date 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 the Spraybrake Ltd 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 .
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 12 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.

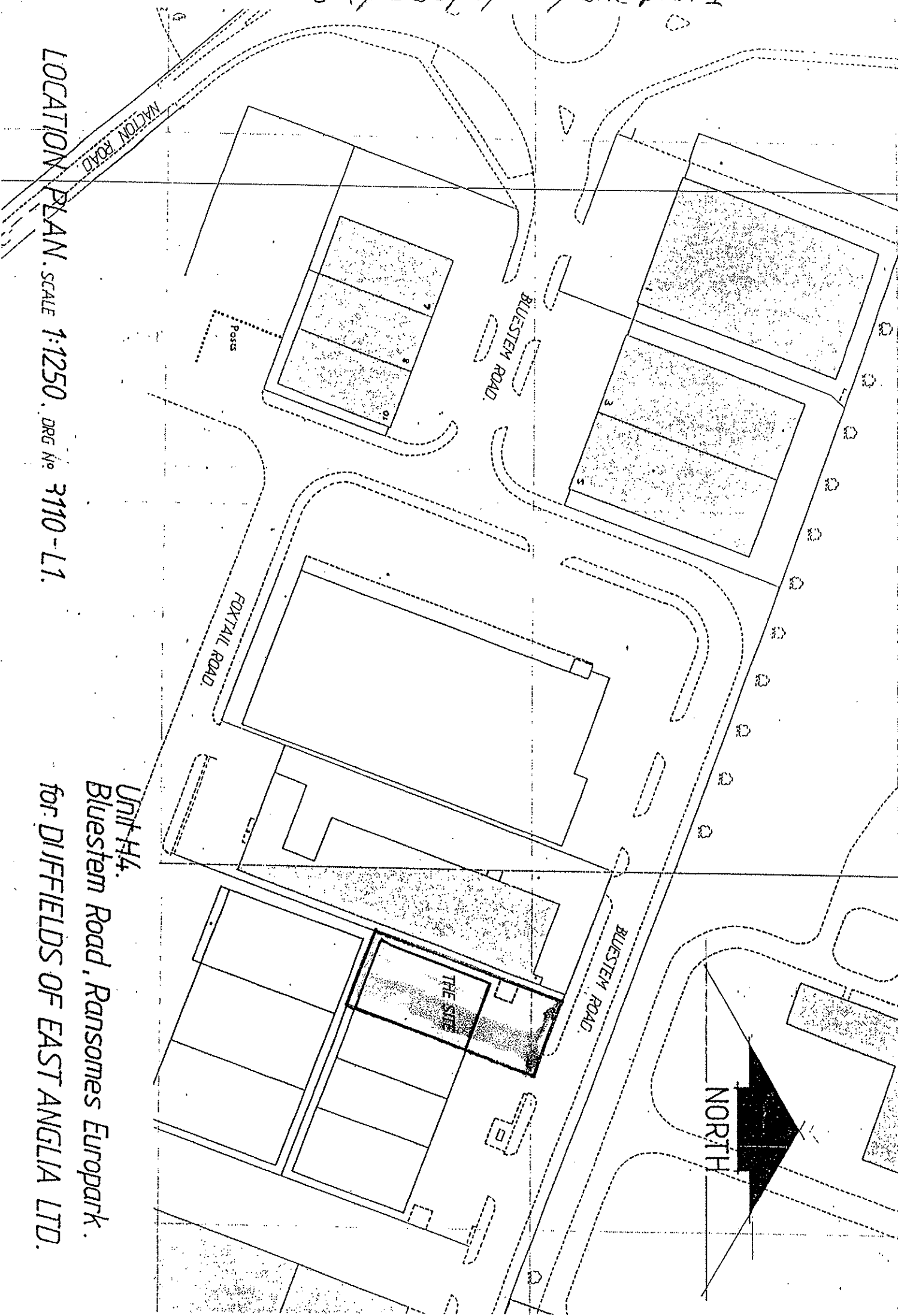
Maintenance

45. Effective preventative maintenance shall be employed on all aspects of the process including all plant, buildings and the equipment concerned with control of emissions to air. In particular:
- (i) a written maintenance programme shall be provided to Ipswich Borough Council with respect to pollution control equipment; and
 - (ii) records of such maintenance shall be made available to an authorised officer of Ipswich Borough Council for inspection.

Notifications

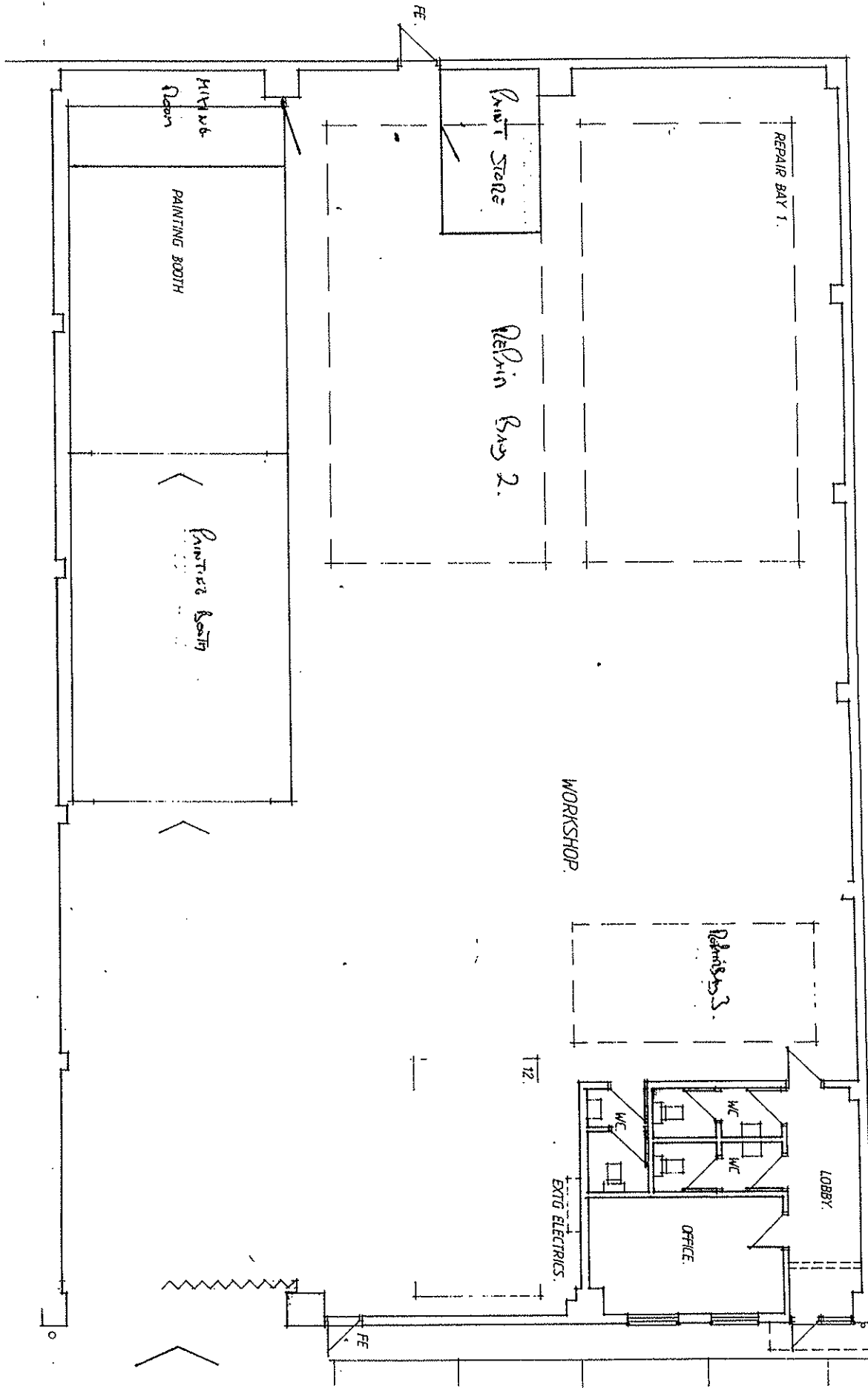
46. The Operator shall notify Ipswich Borough Council without delay of:-
- (i) the detection of an emission of dust that exceeds any limit or criterion in this permit;
 - (ii) records of such maintenance shall be made available to an authorised officer of Ipswich Borough Council for inspection.
47. The Operator shall give written notification as soon as possible prior to any of the following:
- (i) permanent cessation of the operation of part or all of the Permitted Installation;
 - (ii) cessation of operation of part or all of the Permitted Installation for a period likely to exceed one year; and
 - (iii) resumption of the operation of part or all of the Permitted Installation after a cessation has been notified.
48. The Operator shall notify the following matter to Ipswich Borough Council in writing within 14 days of their occurrence:
- (i) any change to the operation capable of altering the substances from the operation;
 - (ii) any change in the Operator's trading name, registered name or registered office address;
 - (iii) any change to particulars of the Operator's holding company (including details of an ultimate holding company where an Operator has become a subsidiary);
 - (iv) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement, or being wound up.

04/12/2011/001 SITE PLAN 1

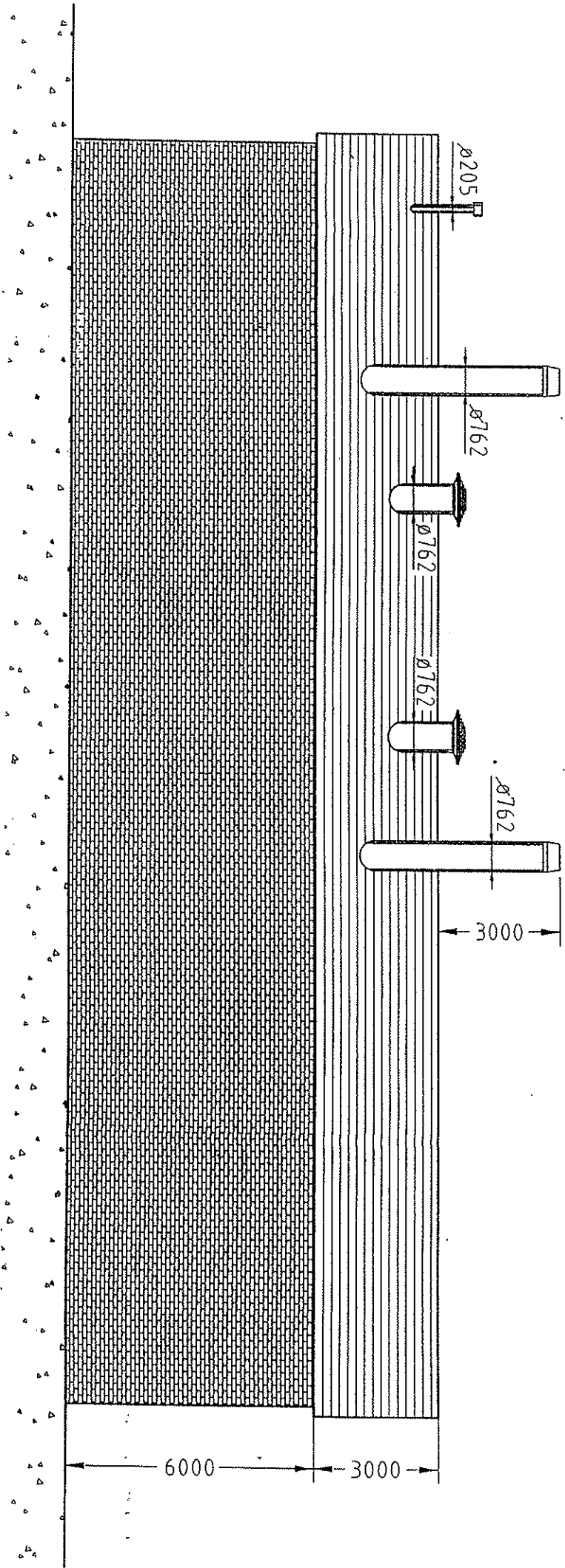


LOCATION PLAN. SCALE 1:1250. DRG No. 3110-L1.

Unit H4.
Bluestem Road, Ransomes Europark.
for DUFFIELDS OF EAST ANGLIA LTD.



FLOOR / BLOCK PLAN.



ELEVATION OFF ARROW X (SCALE 1:100)

Schedule 1 - VOC Compliant Coatings

The compliant coatings are listed in the table 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 the table.

VOC compliant coatings, monitoring and other provisions

All Processes/Activities																													
Volatile Organic Compounds	Recording																												
<p>Compliant Coatings</p> <p>Compliant coatings should be used.</p> <p>The maximum content of organic solvents (in grammes per litre) which may be present in the coating as applied should 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 PG6/34(04).</p> <p>The measurement of volatile organic compounds contents of coatings should be undertaken in accordance with Section 10, with the exception of precleaner, whose volatile organic content should be determined as grammes of solvent per litre of material <i>including</i> water.</p> <table> <tr> <th>Product</th><th>g/l</th></tr> <tr> <td>Gunwash</td><td>850</td></tr> <tr> <td>Precleaner</td><td>200</td></tr> <tr> <td>Wash primer (a)</td><td>780</td></tr> <tr> <td>Precoat</td><td>540</td></tr> <tr> <td>Primer surfacer</td><td>540</td></tr> <tr> <td>Non-sand surfacer</td><td>540</td></tr> <tr> <td>Primers for wet-on-wet topcoat application</td><td>540</td></tr> <tr> <td colspan="2">Topcoats:</td></tr> <tr> <td>1-coat conventional</td><td>420</td></tr> <tr> <td>2-coat base and clear (b)</td><td>420</td></tr> <tr> <td>3-coat topcoat systems (b)</td><td>420</td></tr> <tr> <td>Special products (c)</td><td>840</td></tr> <tr> <td>See Section 10 (about compliant coatings) for notes (a)-(c)</td><td></td></tr> </table>	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 10 (about compliant coatings) for notes (a)-(c)		<p>A record shall be kept of all paint, hardener, organic solvent and substrate and equipment cleaning materials used. The record should state the total organic solvent usage.</p>
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