Supporting Documentation for Application for a permit for respraying of road vehicles covered by process guidance note PG6/34b (06)

Document Reference Number: AUICW001

B.1

Installation involving the activity of Respraying of Road Vehicles as prescribed by Section 6.4 of the Pollution Prevention and Control Regulations 2000, utilising various spray booths located in two separate units, as specified in Schedule A. Exhaust gases from the booths are vented via filtration units serving each spray booth. Various dust extraction units are used to collect particulate matter.

All emissions to air, other than condensed water vapour, shall be free from persistent visible emissions. All emissions will be free from droplets. There should be no offensive odour beyond the site boundary, as perceived by the Regulator. Emissions from any combustion process shall be free from visible smoke in normal operation and in any case will not exceed the equivalent of Ringelmann Shade 1 as described in BS 2742: 1989.

Visual assessments of emissions of particulate matter from the exhaust stacks servicing the spray booths, as specified are marked on the on site plan, shall be made frequently and at least once a day during operation. The results of this assessment shall be recorded in the environmental management system as required to be kept in accordance with Condition 19.

Emissions of particulate matter from the exhaust vents serving the spray booths, as specified in schedule A, shall not exceed 10mg/m3.

Emissions of sulphur dioxide from the exhaust vents serving the spray booths, as specified in schedule A, will not exceed 1% wt/wt sulphur in the fuel.

B.2

<table>
<thead>
<tr>
<th>Point Source</th>
<th>Chimney / Vent (Identified by a number &amp; detailed on plan)</th>
<th>Fugitive Source (e.g. stock piles / storage areas)</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>David Utting Booth 1</td>
<td>Chimney 1</td>
<td>Chimney Stack</td>
<td>Unit 18</td>
</tr>
<tr>
<td>David Utting Booth 2</td>
<td>Chimney 2</td>
<td>Chimney Stack</td>
<td>Unit 18</td>
</tr>
<tr>
<td>Junair Booth 1</td>
<td>Chimney 3</td>
<td>Chimney Stack</td>
<td>Unit 7</td>
</tr>
<tr>
<td>Junair Booth 2</td>
<td>Chimney 4</td>
<td>Chimney Stack</td>
<td>Unit 7</td>
</tr>
<tr>
<td>Junair Booth 3</td>
<td>Chimney 5</td>
<td>Chimney Stack</td>
<td>Unit 7</td>
</tr>
<tr>
<td>Junair Booth 4</td>
<td>Chimney 6</td>
<td>Chimney Stack</td>
<td>Unit 7</td>
</tr>
<tr>
<td>Junair Booth 5</td>
<td>Chimney 7</td>
<td>Chimney Stack</td>
<td>Unit 7</td>
</tr>
<tr>
<td>Junair Booth 6</td>
<td>Chimney 8</td>
<td>Chimney Stack</td>
<td>Unit 7</td>
</tr>
<tr>
<td>Nederman Dust Extraction Unit 18</td>
<td>Dust 1</td>
<td>Contained Unit</td>
<td>Unit 18</td>
</tr>
<tr>
<td>Nederman 1 Dust Extraction Unit 7</td>
<td>Dust 2</td>
<td>Contained Unit</td>
<td>Unit 7</td>
</tr>
<tr>
<td>Nederman 2 Dust Extraction Unit 7</td>
<td>Dust 3</td>
<td>Contained Unit</td>
<td>Unit 7 (not plumbed in)</td>
</tr>
<tr>
<td>Rupes 1 Dust Extraction Unit 7</td>
<td>Dust 4</td>
<td>Contained Unit</td>
<td>Unit 7</td>
</tr>
<tr>
<td>Rupes 2 Dust Extraction Unit 7</td>
<td>Dust 5</td>
<td>Contained Unit</td>
<td>Unit 7 (between booths)</td>
</tr>
<tr>
<td>Gunwash &amp; Paint Mix Room (incorporating solvent based gunwash machine)</td>
<td>Vent 1</td>
<td>Vent</td>
<td>Unit 18</td>
</tr>
<tr>
<td>Gunwash Room (incorporating solvent based gunwash machine)</td>
<td>Vent 2</td>
<td>Vent</td>
<td>Unit 7</td>
</tr>
<tr>
<td>Paint Mixing Room</td>
<td>Vent 3</td>
<td>Vent</td>
<td>Unit 7</td>
</tr>
</tbody>
</table>
CLEANING AND WASTE

12. All equipment cleaning and spray guns testing, cleaning and spray out after cleaning will be carried out in an automatic, totally-enclosed equipment cleaning machine as specified in B1.2. The cleaning machine will be provided with the minimum of local exhaust ventilation that is necessary to prevent fugitive emission or organic solvent vapour when the machine is opened for introduction or removal of equipment, or for the changing of cleaning solvent.

13. A receptacle will be provided to collect the organic solvent that has passed through the spray gun during cleaning. When not in use the receptacle should be kept lidded to prevent evaporation or fugitive emission of organic solvent vapour.

14. Application and dispensing of cleaning solvents shall be from a contained device or automatic system when applied directly or dispensed by piston type dispenser, or similar, when used on wipes.

15. Drums, funnels, tins, wipes or wastes contaminated with VOC will be kept tightly shut, sealed in containers.

16. Dirty solvent and waste paint will be recycled off-site. Copies of all receipts should be kept for three years.

SOLVENT MANAGEMENT

17. The maximum content of organic solvents within the coatings applied shall not exceed the limits set out in clause 9.10 of PG6/34(04). The type of paints used and evidence of their compliance shall be made available to the Regulator on request.

18. A Solvent Management Plan (SMP) will be maintained to demonstrate compliance with VOC requirements of the Solvent Emissions Directive (SED). This will include keeping a detailed record of all solvent inputs and outputs from the permitted activity. The record shall be kept in such a way that the 'total emission' can be determined, and this determination will be made available to the regulator. The figure obtained, together with proof of the calculations, will also be made available to the Regulator.

DISPERSSION FROM STACKS / CHIMNEY / VENTS

19. The discharge height of the stacks serving the spray booths, as specified in B1.2, shall be no less than 3m above roof ridge height of any building within 15m of the base of the chimney or vent.

20. The efflux velocities for spray booths, as specified in B1.2, shall exceed 9m/s.

MANAGEMENT / GENERAL OPERATION

21. An appropriate environmental management system will be implemented. The EMS will show commitment to establishing objectives, setting targets, measuring progress and revising the objectives according to results. This includes managing risks under normal operating conditions and in accidents and emergencies. Initially this will be implemented by Bodyshop Services but in the future may take the form of adopting published standards (ISO 14001).

22. An effective preventative maintenance programme shall be employed on all aspects of the activity including all plant and machinery likely to either prevent or cause emission to air. A written maintenance programme shall be available to the regulator with respect to pollution control equipment. A record of this maintenance work will be recorded in the EPR log and be available for inspection by the regulator.

23. Essential spares and consumables will be held (or available locally at short notice) for the plant, or alternatively:
   a. A service contract for the plant, which includes a priority attendance requirement for equipment failure, is held with a suitable contractor.
   b. A mobile service and repair engineer, carrying essential spares and consumables is employed by the Company.

24. All staff whose duties include the operation of plant and machinery likely to either prevent or cause emission to air of any substance will receive the appropriate training, supervision and instructions. We will maintain a statement of training requirements of each operation post and keep a record of the training received by each person whose actions have impact upon the environment. These documents shall be made available to the Regulator on request.
**B1.3**

**VOC HANDLING AND STORAGE**

1. All potentially odorous coatings and waste materials will be stored in suitable, closed containers.

2. Solvent containers (including containers for wastes contaminated with solvents) shall be capped or suitably sealed to prevent evaporative loss, except as required for access during normal use.

**SPRAY BOOTHs AND OPERATION**

3. All spraying operations will be carried out within the totally enclosed spray booths as specified in B1.2, under negative pressure so as to prevent fugitive emissions of odour and particulate matter.

4. All operations within the spray booths, as specified in B1.2, likely to give rise to odours, fume or particulate matter, shall not be undertaken without the extraction systems provided, fitted and working.

5. When a spraying activity is in progress, the totally enclosed spray booths, as specified in B1.2, shall operate under negative pressure only. The pressure operated automatic shutdown mechanisms associated with each booth shall be maintained in working order to ensure that spray operations cannot be undertaken in the event of positive pressure. Any occurrence of positive pressure and any corrective action taken will be recorded in on the EPR log.

6. All spraying of solvent-containing coatings capable of being sprayed by equipment with a maximum atomisation pressure of 67.5 kPa, shall be sprayed utilising the High Volume Low Pressure (HVLP) spray guns. The atomisation pressure of 67.5 kPa (10psi) shall not be exceeded.

7. All mixing of paints/solvents shall be undertaken in the paint mixing room.

8. All preparation activities likely to give rise to odours, fume or particulate matter, shall be undertaken within the bodyshops (Unit 1B & Unit 7). All activities likely to give rise to airborne particulate matter shall be undertaken utilising the dust extraction systems, as specified in 81.2.

9. The 'paint-stop' filters (monofilament glass-fibre filters) utilised for particulate arrestment, located prior to the exhaust outlets of the spray booths, as specified in B1.2, and shall be examined weekly. Replacement shall be undertaken as required by that inspection. A record of the weekly examination and the replacement shall be made in the EPR log.

10. The spray booths, as specified in B1.2, shall be serviced on a regular basis, this servicing shall include parts of the plant designed to prevent emissions of particulate matter to atmosphere and to regulate the products of combustion. A record of this servicing shall be made in the EPR log.

11. An EPR log will be kept containing a record of all visual assessments, filter replacements and servicing. The log will include the time and date of the record, the result and the name of the person undertaking the assessment, replacing the filters and/or undertaking the servicing. The log will be made for inspection by the Regulator and be kept on the premises occupied by the installation and contain at least the previous two years' records.
1. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions we will:
   a. investigate and undertake remedial action immediately;
   b. adjust the process or activity to minimize those emissions; and
   c. promptly record the events and actions taken in the EPR log.

   The regulator will be informed without delay if there is an emission that is likely to have an effect on the local community; or in the event of the failure of key pollution control apparatus.

1. The following monitoring will be undertaken:

   **DAILY**
   - Booths 1 & 2 & 3: Check operating under negative pressure & extract filters are working effectively
   - Paint Mixing & Gunwash Rooms: Ensure extraction is operational and monitor housekeeping, including lidded waste & dispensers
   - Dust Extraction Systems: Ensure operational
   - Housekeeping: Record suitability of provision and general bodyshop tidiness, product storage etc.
   - Boundary Check: Note any anomalies in respect of smells, storage & stack emissions or damage

   **WEEKLY**
   - Booths/Ovens: Check all filters (inlet, outlet and any accessible recycle filters) and door seals
   - Paint Mixing & Gunwash Room: Inspect gunwash machines, waste provision, door seals & for negative pressure etc.
   - Dust Extraction Systems: Shakedown system, check each extraction point & record any emptying of unit
   - Solvent Store: Monitor suitability & volumes stored
   - Product & Waste Storage: Review provision and record any problems or significant changes
   - Compliant Sprayguns & Coatings: Confirm continued sole use of compliant products and technology

   **MONTHLY**
   - Review of General Site Provision: General overview and record findings.
   - Staffing: Note newly engaged staff, changes in productive & supervisory activities
   - Paperwork Filed: Maintenance records, waste transfer notes, VOC reports etc.
   - Parts Department Back-Up: Ensure adequate supply of particulate filters, HVLP spraygun parts etc.

   **MISCELLANEOUS**
   - Filter Changes: Details all arresting filter changes (e.g. partial/full incl. plant reference numbers)
   - Waste Disposal: Record dates of removal of waste
     - (a) paint related & solvent
     - (b) double-bagged waste (low hazard)
     - (c) bumpers, aerosol & other

**B1.6 Environmental Policy**

Environmental protection is of growing importance to Ambrosetti. We aim to create a positive environmental image. Having considered the ecological and legislative framework conditions, environmental pollution is to be minimised as far as is reasonably practicable both during and at the end of a material's lifespan so as to conserve valuable resources.

We will continue to seek advice and guidance from our consultants and suppliers on all environmental topics in order to continually improve and to conform to legal requirements and those of our customers. This will be aimed primarily at the reduction of airborne emissions to atmosphere, soil and the water table and with minimise the impact of any waste produced. We undertake to adhere to the conditions laid down by local authoritative bodies, in respect of the Environmental Protection Act and related legislation, at all times, and to continue to seek to utilise low impact materials, to recycle and to appropriately segregate and dispose of waste.

The Directors and Managers will be responsible for monitoring the use of energy, material resources and disposal, and where necessary to recommend proposals for reduction (where these do not affect health & safety requirements, nor significantly impact upon production). The Company will strive for continuous improvements to standards of environmental protection.
B1.7
See site plan – Schedule A

B1.8
Organic-solvent materials are stored in the container they are purchased in whether it be paint tins, drums, aerosols etc.

Aerosols that are in use are stored on trolleys for easy access for the smart repair employees or stored in a flammables locker when not in use. Paint tins are stored in the self contained mixing rooms. Thinners are stored in the 25l drums in the paint mix rooms or gunwash room.

Waste paints are poured into drums (funnel with lid to prevent vapours escaping) located inside the gunwash rooms. When full they are stored in an external flammable store.

B1.9
See booth records Schedule B

B1.10b
N/A

B1.11
VOC reports from all supplies are requested on a month basis. At the end of each quarter figures are recorded on in the environmental management system. An annual calculation will be made at the end of each 12 month monitoring period.

B1.12
See EPR Log & Audit – Schedule C

B1.14
N/A

B1.15
Sprayguns are connected to the gun cleaning machine. The lid is then closed so the process of gun cleaning is totally enclosed. Gunwash machines all have extraction which is routed to external vents. Testing of spray guns is completed in the spraybooths.

B1.16
Sprayguns are connected to the gun cleaning machine. The lid is then closed so the process of gun cleaning is totally enclosed within the machine. Gunwash machines all have extraction which is routed to external vents within the gunwash rooms.

B1.17
Metal lidded bins are in place to ensure emissions from wipes are not emitted. Paint tins with residue are baked off in the oven to stop it venting to atmosphere.

B1.18
ISO 14001 is being considered. Currently running a tailored EMS run by Bodyshop Services.

B1.19
Training has been completed for supervisors who carry out the log keeping. Training will be encompassed into part of the induction when employees start on the first day. Annual refresher training will be completed and
B2.1
Facility is not in air quality management area. No complaints received directly to Ambrosetti (UK) Ltd. Possible odours may encroach on the local community or visible emissions may be seen in the local area.

No major environmental impact has been noted.

B2.3
N/A – considered low risk by the Company based on the operations undertaken at other sites.