

## **Environmental Permit**

**Pollution Prevention and Control Act 1999**

**Environmental Permitting (England and Wales) Regulations 2016**

***Alexander Dennis Limited  
Unit B,  
Barrows Road  
Harlow  
Essex  
CM19 5FD***

**Regulated activity:**

***Painting and re-spraying road vehicles***

**Permit Number:**

***EPR/6.4/18/V1/AD***

**Permit Issued by:**

Environmental Health Services  
Harlow Council  
Civic Offices  
The Water Gardens  
Harlow  
Essex  
CM20 1WG

Telephone: (01279) 446111  
Fax: (01279) 446767

Email: [env.health@harlow.gov.uk](mailto:env.health@harlow.gov.uk)  
Website: [www.harlow.gov.uk](http://www.harlow.gov.uk)

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### **Permit Status Log**

<b>Detail</b>	<b>Date</b>	<b>Comment</b>
<i>Application received</i>	<i>27<sup>th</sup> November 2017</i>	-
<i>Application duly made</i>	<i>30<sup>th</sup> November 2017</i>	-
<i>Draft Permit</i>	<i>23<sup>rd</sup> January 2018</i>	<i>Consultation now closed</i>
<i>Permit</i>	<i>11<sup>th</sup> July 2018</i>	<i>EPR/6.4/18/V1/AD</i>

## **Introductory Note**

*This introductory note does not form part of your Environmental Permit conditions, however it does provide useful information about the Environmental Permitting Regulations:*

The following Permit is issued under Regulation 13(1) of the Environmental Permitting (England and Wales) Regulations 2016 (S.I 2016 No. 1154), (“the EPR”) to operate a scheduled installation carrying out an activity, or activities covered by the description in section 6.4B(b) of Part 2 to Schedule 1 of the EPR, 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 LAPPC Process Guidance note (PG6/34(11)), 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 EPR 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 EPR. 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 EPR.

### **Talking to us**

Please quote the permit number if you contact the Regulator about this permit. To give a notification in accordance with this permit, please use the contact details on the front cover.

## Description of the installation and regulated activity

*This description of the installation and the regulated activity do not form environmental permit conditions, however it does provide useful information about the installation and the activities undertaken. It also provides a reference point in relation to any substantial or non-substantial changes.*

**Alexander Dennis Limited** operates a vehicle refinishing activity, spray painting buses and coaches in a specialised spray booth when carrying out refurbishment or following repair after accident damage.

Items are prepared before painting, the degree of preparation depending on the works required, which can include: paint stripping, the filling and sanding of uneven surfaces, and the cleaning of surface prior to painting.

The vehicle or panel may be primed before painting, and the colour of paint mixed from a precise recipe to obtain a specific colour or colour match. Primers and paints are applied in the spray booths with hand held spray equipment, after which the booth 'cures' the painted surface into a hard coating. Solvents evaporate from the painted surface during the curing process and these emissions pass through filters in the booth air extraction systems before being released through the process chimneys.

Materials and equipment contaminated with paint are cleaned using solvent cleaning systems and/or water. Dirty solvents used for cleaning are recovered for recycling and re-use by an external contractor.

The activities authorised by this Permit shall not extend beyond the installation boundary that being the land shown as edged in red on the site plan in schedule 1, and described in the Permit application. The layout of the installation is detailed in site plan in schedule 2. The installation comprises:

Building / Area	Components / notes
Main workshop	2 No. Haltec spraybooth ovens operating as 1 large bay or can divided into 2 smaller bays. <ul style="list-style-type: none"><li>➤ Haltec Airstream CV serial number SB170118</li></ul> 3 No. KS260EPN Rupes dust extraction unit <ul style="list-style-type: none"><li>➤ bagged collection (not emitted to atmosphere)</li></ul> HVLP gravity-fed spray guns.
Paint mixing room	Paint storage and mixing Gun cleaning

**Permit Reference Number:**

EPR/6.4/17/V1/AD

**Harlow Council** (“the Regulator”) in exercise of its powers under Regulation 13(1) of the Environmental Permitting (England and Wales) Regulations 2016 (S.I 2016 No. 1154), hereby permits **Alexander Dennis Limited** (“the Operator”).

Whose registered office is:

**16 Charlotte Square**  
**Edinburgh**  
**Midlothian**  
**EH2 4DE**

Company registration number: **SC268016**

to operate an installation at:

**Alexander Dennis Limited**  
**Unit B, Barrows Road**  
**Harlow, Essex**  
**CM19 5FD**

The Operator is permitted to carry out the following activities:

- The re-spraying of road vehicles or parts of them if the activity may result in the release into the air of particulate matter or of any volatile organic compound and the carrying on of the activity is likely to involve the use of 1 or more tons of organic solvents in any period of 12 months, Section 6.4, Part B(b) 'Coating activities, Printing and Textile Treatments' of the Environmental Permitting (England and Wales) Regulations 2016 as described, and in accordance with the conditions contained in this permit.

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

This Permit shall be subject to replacement, variation or amendment as may be considered appropriate by Harlow Council, at any time, according to the provisions of Regulation 20 of the EPR.

Dated this day

11<sup>th</sup> July 2018

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## Conditions

*The following Environmental Permit conditions are legal requirements.*

### Non-VOC emissions

1. The limits for emissions to air for the parameters set out in table 2.1 shall not be exceeded. Suitable alternative monitoring techniques must be agreed with the Regulator in advance and in writing.

Parameter	Source	Emission limits / provisions	Monitoring method	Monitoring frequency
Particulate matter	Spray booths	10mg/m <sup>3</sup>	By guarantee supplied by the constructor of the spray booth	None required
	Abrasive blasting equipment and other sources (except spray booths)	50mg/m <sup>3</sup> for contained sources	Manual extractive Testing in accordance with BS6069: Section 4.2 1992	In accordance with the written plan (refer to condition 3)
Sulphur dioxide	All processes / activities	1% wt/wt sulphur in fuel	Certification by supplier or first delivery, using test method ASTM D86 distillation	None required
	All processes / activities using gas oil as defined in the Sulphur Content of Certain Liquid Fuels Directive (1999/32/EC)	0.2% wt/wt sulphur in fuel (before 1/01/2008) 0.1% wt/wt sulphur in fuel (from 1/01/2008)		

All emissions shall be determined at the standard reference conditions of 273.15K and 101.3kPa, without correction for water vapour content.

2. 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.
3. 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.
4. Dusty wastes shall be stored in closed containers.
5. Dry sweeping of dusts and dusty wastes is not permitted.
6. The dry sanding of vehicles using powered equipment shall only be carried out when the Rupes Dust Extraction unit is in operation. Particulate emissions from the sanding of vehicles shall be extracted at source by the dust extraction unit and collected into the filter bag dust collection system. Filter bags shall be changed as required and securely bagged or stored in enclosed containers whilst awaiting disposal.
7. 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, and;
  - records shall be kept by the Operator for at least two years.

8. 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.
9. Within 8 weeks of the completion of monitoring activities, the results of non-continuous emission testing shall be forwarded to the Regulator.
10. In the event of any adverse results from any monitoring activity in relation to the provisions of the table 2.1, **and as soon as the results are obtained/received**, the Operator shall:
  - identify the cause and take corrective action, and;
  - record as much detail as possible regarding the cause and extent of the problem, and;
  - record the action taken by the Operator to rectify the situation, and;
  - re-test to demonstrate compliance as soon as possible, and;
  - notify the Regulator.
11. In the case of abnormal emissions, or malfunction or breakdown leading to abnormal emissions, the Operator shall:
  - investigate immediately and undertake corrective action, and;
  - adjust the process or activity to minimise those emissions, and;
  - promptly record the events and actions taken, and;
  - notify the regulator without delay, if the emission is likely to have an effect on the local community.

### **VOC emissions**

12. 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 Schedule 3 of this permit.
13. 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 Schedule 4 of this permit.
14. All paint spraying operations shall be carried out in a totally enclosed booth under negative pressure, to prevent fugitive emissions of VOCs.
15. Spray applied coatings shall be applied to passenger vehicles using the following method:
  - high volume low pressure (HVLP) (maximum atomisation pressure 67.5kPa) spraying equipment.
16. Spray applied coatings shall be applied to commercial vehicles using the following method:
  - high volume low pressure (HVLP) spraying

17. 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.
18. All spray gun testing and spray out 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.
19. Cleaning solvents shall be dispensed by a piston type dispenser or similar contained device, when used on wipes.
20. Pre-impregnated solvent wipes shall be held within an enclosed container prior to use.
21. 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.
22. Organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas.
23. 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, and;
  - within spillage collectors, of suitable impervious and corrosion-proof materials and capable of containing 110% of the largest container, and;
  - away from sources of heat.

*For information, these conditions should not conflict with the requirements of occupational health and safety regulations*
24. 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, and;
  - within spillage collectors, of suitable impervious and corrosion-proof materials and capable of containing 110% of the largest container, and;
  - away from sources of heat.
25. 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.
26. 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.
27. Waste solvents and waste coatings shall be recycled off-site. Copies of receipts of waste materials removed from site for recycling shall be kept for three years.



### **Visible and odorous emissions**

28. All releases to air, other than condensed water vapour, shall be free from persistent visible emissions.
29. All emissions to air shall be free from droplets.
30. There shall be no offensive odour beyond the site boundary, as perceived by the Regulator.
31. 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**

32. All emissions of particulate matter from the Haltec spray booths shall be emitted from the stacks connected to the air duct in Schedule 2 – site plan. The stack shall be 3m above roof height.
33. The activity shall operate in accordance with the Operators in-house environmental management system which shall include, but not be limited to:
  - training, and;
  - maintenance, and;
  - spraybooth operations, and;
  - procedures for spray gun sprayout operations, and;
  - procedures dealing with solvent spillages, and;
  - procedures handling solvent contaminated wipes and waste.
34. Staff shall receive the necessary training and instruction, which shall include, but not be limited to:
  - awareness of the Environmental Permitting Regulations, and;
  - environmental permit conditions and what they mean in practice, and;
  - spraybooth operations, and;
  - spray gun sprayout operations, and;
  - dealing with solvent spillages, and;
  - handling solvent contaminated wipes and waste.
35. A record of staff training and instruction shall be maintained by the Operator and shall be available to the Regulator on request.
36. A written record of all maintenance carried out in accordance with Condition 3 shall be made available for inspection by the Regulator.

### **Reporting and notification conditions**

37. 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.

**Best available techniques**

38. 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 activity which is not specifically regulated by any condition of this permit.

## Interpretations and Explanatory Notes

*These interpretations and explanatory notes does not form part of your Environmental Permit conditions, however they do provide useful information about the Environmental Permitting Regulations:*

In relation to this Permit, the following expressions shall have the following meanings:

<i>"Activity"</i>	An activity listed in Part 2 of Schedule 1 to the EP Regulations which will form part of an EP installation or be a mobile plant
<i>"The EPR / EP Regulation"</i>	Means the Environmental Permitting (England and Wales) Regulations 2016 S.I. 2016 No.1154 and words and expressions defined in the EPR shall have the same meanings when used in this Permit save to the extent they are explicitly defined in this Permit.
<i>"Change in Operation"</i>	In relation to an installation or mobile plant, a change in its nature or functioning or an extension which may have consequences for the environment.
<i>"Enforcement notice"</i>	A notice served by a local authority to enforce compliance with the permit conditions or require remediation of any harm following a breach of any condition.
<i>"Installation"</i>	A stationary technical unit where one or more activities listed in Part 2 of Schedule 1 to the EP Regulations are carried out and any other location on the same site where any other directly-associated activities are carried out, and any activities that are technically linked. The terms 'regulated facility' and 'installation' are, in effect, interchangeable for A(2) and B activities.
<i>"Operator"</i>	The person who has control over the operation of the installation/regulated facility (EP Regulation 7).
<i>"Permit"</i>	A permit granted under EP Regulation 13 by a local authority allowing the operation of an installation subject to certain conditions.
<i>"Pollution"</i>	Any emission as a result of human activity which may be harmful to human health or the quality of the environment, cause offence to any human senses, result in damage to material property, or impair or interfere with amenities and other legitimate uses of the environment (EP Regulation 2(1)).
<i>"Revocation notice"</i>	A notice served by the Regulator under EP regulation 22 revoking all or part of a permit.
<i>"Permitted Installation"</i>	Means the activities and the limits to those activities described in this Permit.
<i>"Monitoring"</i>	Includes the taking and analysis of samples, instrumental measurements (periodic and continual), calibrations, examinations, tests and surveys.
<i>"MCERTS"</i>	Means the Environment Agency's Monitoring Certification Scheme.
<i>"Fugitive Emission"</i>	Means an emission to air or water (including sewer) from the Permitted installation that is not controlled by an emission limit imposed by a condition of this Permit.
<i>"Regulator"</i>	Means any officer of Harlow Council who is authorised under Section 108(1) of the Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in Section 108(1) of that Act.
<i>"Best Available Techniques (BAT)"</i>	<p>Best available techniques means the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing in principle the basis for emission limit values designed to prevent, and where that is not practical, generally to reduce emissions and the impact on the environment as a whole.</p> <p>For those purposes:</p> <p>"Available techniques" means those techniques which have been developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the cost and advantages, whether or not the techniques are used or produced inside the United Kingdom, as long as they are reasonably accessible to the Operator;</p> <p>"Best" means, in relation to techniques, the most effective in achieving a high general level of protection of the environment as a whole;</p> <p>"Techniques" includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned. Schedule 2 of the Regulations shall have effect in relation to the determination of best available techniques.</p>

Where any condition of this Permit refers to the whole or parts of different documents, in the event of any conflict between the wording of such documents, the document with the most recent publication date shall be taken to be the most appropriate document to be used.

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  
Environment Team, Major and Specialist Casework  
Room 4/04 – Kite 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;

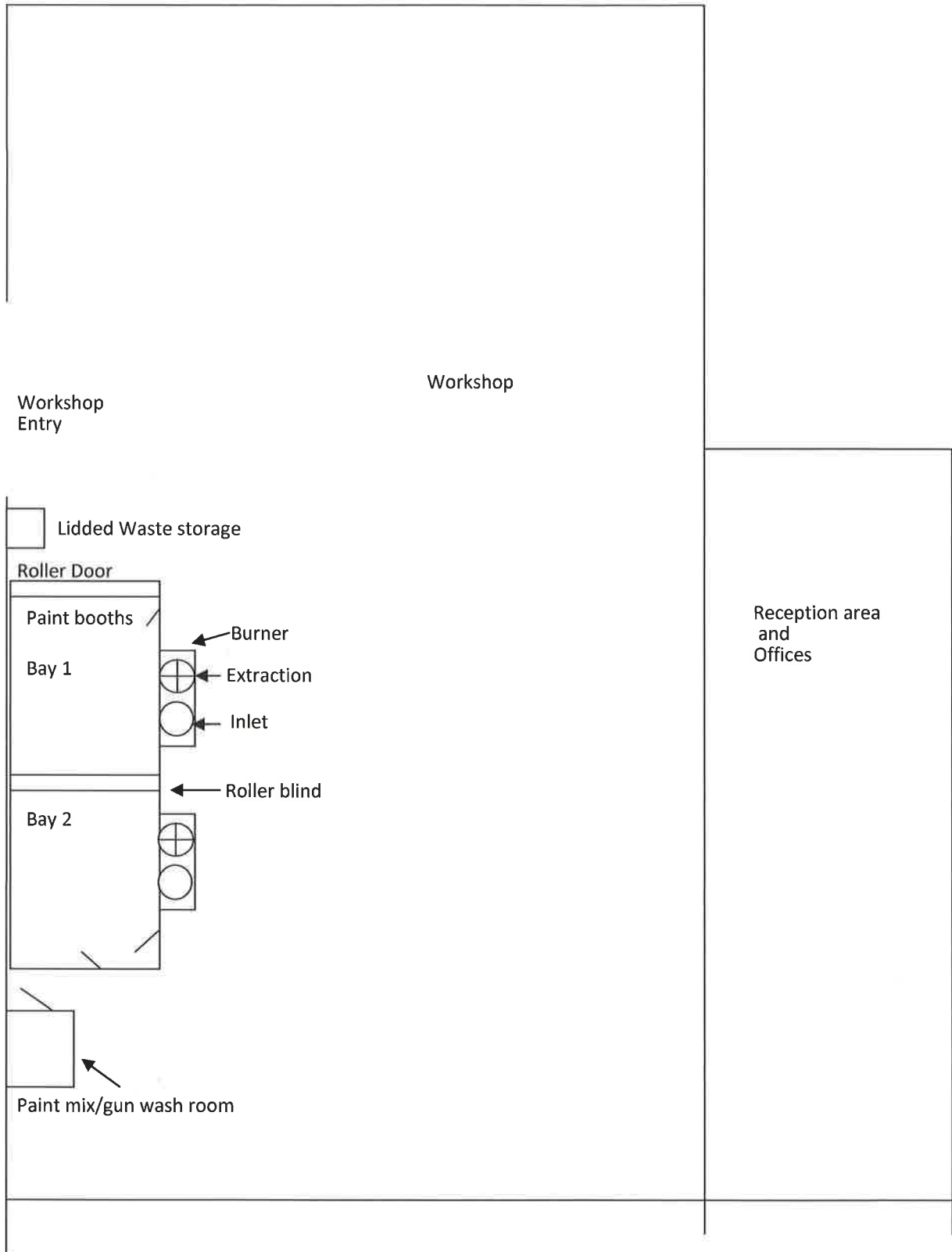
- (a) A statement of the ground of appeal;
- (b) A copy of any relevant application;
- (c) A copy of any relevant Permit;
- (d) A copy of any relevant correspondence between the person making the appeal (“the appellant”) and the Council;
- (e) A statement indicating whether the appellant wishes the appeal 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 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.



Site	Alexander Dennis Limited		
Project	Permit application		
Drawing	Location Plan	No.	Schedule 1
Date	18 <sup>th</sup> January 2018	Scale	1:750



Site	Alexander Dennis Limited		
Project	Permit application		
Drawing	Site Plan	No.	Schedule 2
Date	4 <sup>th</sup> July 2018	Scale	Not to scale

## Schedule 3

### Bodyshop products covered by this permit

- a) 'Preparatory and cleaning' means products designed to remove old coatings and rust, either mechanically or chemically, or to provide a key for new coatings:
  - (i) Preparatory products include gunwash (a product designed for cleaning spray-guns and other equipment), paint strippers, degreasers (including anti-static types for plastic) and silicone removers;
  - (ii) 'Precleaner' means a cleaning product designed for the removal of surface contamination during preparation for and prior to the application of coating materials;
- b) 'Bodyfiller/stopper' means heavy-bodied compounds designed to be applied to fill deep surface imperfections prior to the application of the surfacer/filler;
- c) 'Primer' means any coating that is designed for application to bare metal or existing finishes to provide corrosion protection prior to application of a primer surfacer:
  - (i) 'Surfacer/filler' means a coating designed for application immediately prior to the application of topcoat for the purpose of corrosion resistance, to ensure adhesion of the topcoat, and to promote the formation of a uniform surface finish by filling in minor surface imperfections;
  - (ii) 'General metal primer' means a coating designed for application as primers, such as adhesion promoters, sealers, surfacers, undercoats, plastic primers, wet-on-wet, non-sand fillers and spray fillers;
  - (iii) 'Wash primer' means coatings containing at least 0,5 % by weight of phosphoric acid designed to be applied directly to bare metal surfaces to provide corrosion resistance and adhesion; coatings used as weldable primers; and mordant solutions for galvanised and zinc surfaces;
- d) 'Topcoat' means any pigmented coating that is designed to be applied either as a single layer or as a multiple-layer base to provide gloss and durability. It includes all products involved such as base coatings and clear coatings:
  - (i) 'Base coatings' means pigmented coatings designed to provide colour and any desired optical effects, but not the gloss or surface resistance of the coating system;
  - (ii) 'Clear coating' means a transparent coating designed to provide the final gloss and resistance properties of the coating system;
- e) 'Special finishes' means coatings designed for application as topcoats requiring special properties, such as metallic or pearl effect, in a single layer, high-performance solid-colour and clear coats, (e.g. anti-scratch and fluorinated clear-coat), reflective base coat, texture finishes (e.g. hammer), anti-slip, under-body sealers, anti-chip coatings, interior finishes; and aerosols.

## Schedule 4

### Maximum 'application-ready' VOC contents for individual categories of products

Product subcategory		Coatings	VOC g/l (*)
a	Preparatory and Cleaning	Preparatory	850
		Pre-cleaner	200
b	Body filler/stopper	All types	250
c	Primer	Surface / filler and general (metal) primer	540
		Wash primer	780
d	Topcoat	All types	420
e	Special finishes	All types	840

(\*) g/l of ready for use product. Except for subcategory (a) and water content of the product ready for use should be discounted.