

Mark White
Nationwide DWS Harlow
Riverway
Temple Field
Harlow, Essex
CM20 2ES

Harlow Council
Civic Centre
The Water Gardens
Harlow
Essex CM20 1WG

www.harlow.gov.uk

Our Ref: B/09/02128

Date: 15/05/17

Dear Mark White,

**Environmental Permitting (England and Wales) Regulations 2016
Nationwide DWS Harlow, Riverway, Templefields, Harlow**

As part of our inspection programme I wish to confirm my visit of the 19th April 2017, to the above premises.

I would like to take this opportunity to thank Craig Mitchel and Peter Healy for their assistance during the inspection.

Please find enclosed an inspection report for the above installation.

Please do not hesitate to contact me should you wish to discuss this matter further.

Yours sincerely

Steven Adams
Senior Environmental Health Practitioner
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LA-PPC Inspection Report

General Information

Inspection Type	Full Annual
Regulator/ Local Authority	Harlow District Council:
Site Name and Address	Nationwide DWS Harlow, River Way, Harlow, Essex. CM20 2ES
Installation Type	Vehicle Refinishing Process
Permit Reference	EPR/B/6.4/NARS
Site Representative Seen	Craig Mitchel & Peter Healy
Inspection Date	19/04/2017
Duration of Inspection	90 minutes
Report date	15/05/2017
Review of permit conditions undertaken	The permit was reviewed to take account of the recent permit transfer. Permit conditions reflect BAT and no change required.

Recent History

	Comments	Action
Number of complaints received	None	None
Process/Installation changes	None reported	None

Future Developments

	Comments	Action
Information relating to PPC and breaches of permit conditions	None	None
Other relevant information	None	None

Risk Assessment

Risk Assessment Score	25
Summary of changes	None

Summary of Inspection

A VOC purchase analysis could not be fully established from records kept on site.
 Email requests for information relating to this installation have gone unanswered.
 Staff training records were not available on site.

Reference to any breach of condition (or not) and other compliance issues as necessary	Staff at all levels shall receive the necessary training and instruction to enable them to comply with the conditions of this permit. Records shall be kept of relevant training undertaken and be made available on request of the regulator.
Other relevant information	None

Inspection Notes

Weather Conditions	Dry, sunny.
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Unique/Abnormal Site Hazards to take into consideration.	The installation is close to the river.
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Compliance Checking

Inspection List	✓, x or N/A	Observation details	Action Required
Best Available Techniques	✓	Satisfactory facilities and techniques	None
Visual & Odorous Emissions monitoring <i>Releases to air free from visible emissions?</i> <i>Emissions to air free from droplets?</i> <i>No offensive odour beyond site boundary?</i>	✓	No visible & odour emissions during visit. Carried out every Monday and recorded in the logbook.	None
Logbooks and Records <i>Particulate matter/local exhausts ventilation, controls and maintenance.</i>	✓	All equipment regularly maintained and documented. Checked 01/03/2017.	None
Compliant coatings and VOC purchase analysis	x	No record of paint purchases during inspection.	<i>Please send VOC purchase analysis report for all VOC containing products used during 2015/16</i>
Records of breakdowns, spillages or other incidents leading to abnormal emissions	✓	No significant issues reported.	None
Waste paint and solvent collection arrangements	✓	Via licensed waste carrier for reprocessing/disposal.	Copies of receipts of waste materials removed from site shall be kept for three years.
Staff training and records	x	Training undertaken mainly covers COSHH purposes. There is no training covering the permit conditions and the need to minimise emissions.	All staff whose functions could impact on air emissions from the activity should receive appropriate training on those functions. This should include: <ul style="list-style-type: none"> • awareness of their responsibilities under the

			<p>permit;</p> <ul style="list-style-type: none"> • steps that are necessary to minimise emissions during start-up and shutdown; • actions to take when there are abnormal conditions, or accidents or spillages that could, if not controlled, result in emissions. <p>Training can be sensibly included into the current training program.</p>
Paint and solvent storage	✓	In lidded containers within purpose designed paint shop. Most containers appeared to be in satisfactory condition.	None
Spray gun cleaning	✓	Fully enclosed procedure	None
Paint application techniques	✓	HVLP spray guns	None
Paint application location	✓	Entirely within spray-booths	None
Stack height and dispersion	✓	No changes	None
Storage of waste paint and solvent	✓	In sealed containers within metal cabinet	None

End

1 - Compliance Assessment

Scoring for Compliance Assessment

Scale of Non-Compliance	Possible Score	Score Awarded
(A) Incident leading to justified complaint but no breach of any specific permit condition or of the general/residual BAT condition.	10 points	0
(B) Incident leading to a justified complaint*.	5 points per incident	0
(C) Breach of permit not leading to formal action.	10 points per breach	10
(D) Incident leading to formal caution, Enforcement Notice or prosecution.	15 points per incident	0
(E) Incident leading to a Prohibition Notice or Suspension Notice.	20 points per incident	0
Total (Max. 50):		10

* Unjustified complaints may be e.g. those considered by the inspector to be unreasonable or which cannot be clearly linked to an incident at the process.

2 - Assessment of Monitoring, Maintenance and Records

Scoring for Assessment of Monitoring, Maintenance and Records

Criterion	Possible Score			Score Awarded
	Yes	No	N/A	
(A) Are emissions and emissions monitoring recorded as required in the permit?	0	10	0	0
(B) Process operation modified where any problems indicated by monitoring?	0	5	0	0
(C) Is an appropriate maintenance schedule in place and available on request?	0	5	0	0
(D) Does the Operator keep records of inspections, tests and monitoring in relation to the provisions of the permit and make them available to the Regulator on request?	0	5	0	0
(E) All relevant documents forwarded to the authority by date required?	-5	10	0	0
Total:				0

These aspects relate to the operator's performance within the twelve months immediately preceding the assessment or review of the assessment. Failure to monitor to the degree required or to forward documents on time more than twelve months ago should be excluded.

3 - Assessment of Management, Training and Responsibility

Scoring for Assessment of Management, Training and Responsibility

Criterion	Possible Score			Score Awarded
	Yes	No	N/A	
(A) Are procedures in place to ensure proper management, supervision and training for process operations, proper use of equipment and effective preventative maintenance on all plant and equipment concerned with the control of emissions to the air?	0	5	0	5
(B) Specific responsibilities assigned to individual staff for these procedures?	0	0	0	0
(C) Does the operator maintain, and make available on request, a statement of training requirements for each operational post?	0	5	0	5
(D) Does the Operator maintain a record of staff training and instruction and make it available to the Regulator on request?	0	5	0	5
(E) Trained staff on site throughout periods where potentially polluting activities take place?	0	5	0	0
(F) Is an 'appropriate' environmental management system in place and working effectively?	9	0	0	0
Total:				15

4 - Determination of Regulatory Effort from Scores

Actual score = 25	Score band = <30	Category = Low
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