

PERMIT TO OPERATE A PRESCRIBED PROCESS
POLLUTION PREVENTION AND CONTROL ACT 1999
ENVIRONMENTAL PERMITTING (ENGLAND & WALES)
REGULATIONS 2016

MORGAN MOTOR COMPANY LTD
PICKERSLEIGH ROAD
MALVERN
WORCESTERSHIRE
WR14 2LL

Malvern Hills District Council hereby permits the Morgan Motor Company Ltd to carry out an original vehicle coating activity under Schedule 1, Part 2, Chapter 6, Section 6.4 Part B and Schedule 14 of the Environmental Permitting (England & Wales) Regulations 2016 in accordance with the conditions specified in the attached schedule.

Permit reference 13/00015/B

Signed

A handwritten signature in blue ink, appearing to read 'S.R. Williams', with a long horizontal flourish extending to the right.

Dated 17th May 2023

Mr S.R.Williams, Senior Technical Officer, Worcestershire Regulatory Services.

On behalf of **Malvern Hills District Council**

SCHEDULE

Schedule of conditions attached to and forming part of the permit.

Operator

Morgan Motor Company Ltd., Pickersleigh Road, Malvern WR14 2LL.

Registered Office and Company Number

Morgan Motor Company Ltd., Pickersleigh Road, Malvern. WR14 2LL
No. 07459137

Description of Permitted Activity

The original coating of road vehicles involving the use of solvent containing coating materials, consuming 0.5 tonnes or more of organic solvent in any 12-month period, and comprising the following:

- Preparation before coating, including sanding. The dust from the sanding and other operations are extracted to local vacuum filter units that vent internally and general extraction venting to atmosphere.
- The mixing of coatings in the mixing rooms.
- The coating of the vehicles in one of five gas fired spray-bake booths (2xJunair, 2xDalby & 1xSTL).
- The cleaning of spray guns and other equipment in one of two Drester 9000TT spray gun cleaning units within the paint-mixing rooms.
- The reclamation of used gunwash thinners in a 'Solvent Recycling Unit'

Schedule of Conditions

Non-VOC emissions

1. The following non-VOC emission limits shall apply:

Row	Pollutant	Source	Emission limits / provisions	Type of Monitoring	Monitoring frequency
1	Particulate matter	From spray booths	10 mg /Nm ³	By guarantee supplied by the spray booth.	None required

2. 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.

3. Dusty wastes shall be stored in closed containers.

4. Dry sweeping of dusts and dusty wastes shall not be undertaken.

5. In the case of abnormal emissions, or malfunction or breakdown leading to abnormal emissions, the operator shall:

- investigate immediately and undertake corrective action
- adjust the process or activity to minimise those emissions and
- promptly record the events and actions taken
- notify the regulator without delay, if the emission is likely to have an effect on the local community

The Solvent Reduction Scheme

6. The requirements of the 'Reduction Scheme' must be complied with.

To achieve compliance with the Reduction Scheme the operator shall demonstrate, annually, by calculation that the mass emission of VOC to atmosphere is less than or equal to the 'Target Emission'. The Target Emission being the mass of all solid coating materials multiplied by a factor to give the maximum allowable VOC emission as shown in Table 1 below.

Table 1

Solvent Consumption per Annum	Target Emission
Greater than 500Kg	Total Mass of Solids x 1.2

Determination of Solvent Consumption

7. The operator shall construct an inventory of solvent use within the installation. This shall be used to determine the actual emissions annually in order to comply with condition 6.

The inventory shall be carried out by recording:

- The mass of organic solvent contained in coatings, diluents and cleaners in the initial stock (IS) at the start of the accounting period; plus
- The mass of organic solvent contained in coatings, diluents and cleaners in the purchased stock (PS) during the accounting period.
- Minus the mass of organic solvent contained in coatings, diluents and cleaners in the final stock (FS) at the end of the accounting period.

$$\text{Total Organic Solvent Input (I}_1\text{)} = \text{IS} + \text{PS} - \text{FS}$$

Having calculated total solvent input (I₁), the operator shall then calculate solvent consumption by subtracting from the input figures any solvent that is sent out for recovery.

$$\text{Hence: } C (\text{consumption}) = I_1 - O_8 (\text{recovered solvent})$$

The inventory and consumption data shall be submitted to the regulator for the previous calendar year annually by the **1st March** together with the outcome of the annual EMS review (Condition 27) .

8. All paint spraying operations shall be carried out in a totally enclosed booth under negative pressure, to prevent fugitive emissions of VOCs.
9. Spray applied coatings shall be applied using high volume low pressure (HVLP) (maximum atomisation pressure 67.5kPa) spraying equipment

or

a system capable of achieving a transfer efficiency of at least 65%, determined in accordance with the procedure set out in BS EN 13966-1:2003 Determination of the transfer efficiency of atomising and spraying equipment for liquid coating materials.

10. 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.

11. All spray gun testing and sprayout 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. The operator shall inform the Council in writing of any significant changes in the written procedure.
12. Cleaning solvents shall be dispensed by a piston type dispenser or similar contained device when used on wipes.
13. Pre-impregnated solvent wipes shall be held within an enclosed container prior to use.
14. 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. The operator shall inform the Council in writing of any significant changes in the written procedure.
15. Organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas.
16. 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.
17. 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, within spillage collectors, of suitable impervious and corrosion-proof materials away from sources of heat.
18. Cleaning operations involving organic solvents shall be reviewed at least 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.
19. 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 spray booth and vacuum / extraction plant breakdowns can be rectified rapidly.
20. Waste solvents and waste coatings shall be recycled on or off-site. Copies of receipts of waste materials sent for recycling shall be kept for three years.

21. Coating materials, with designated hazard statements H340, H350, H350i, H360D, H360F, H341 or H351, shall not be used.

Visible and odorous emissions

22. All releases to air, other than condensed water vapour, shall be free from persistent visible emissions.
23. All emissions to air shall be free from droplets.
24. There shall be no offensive odour beyond the site boundary, as perceived by the regulator.
25. 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

26. All emissions of VOC's shall be emitted from the chimneys and vents serving the spray booths shall not be less than 3 metres above the roof ridge height of any building within 15 metres of the base of the chimney or vent.
27. The installation shall be operated in accordance with an Environmental Management System (EMS) that ensures full compliance with the conditions in this permit. The EMS shall be reviewed annually.
28. Staff at all levels shall receive the necessary training and instruction includes:
- awareness of their responsibilities under the Permit; in particular how to
 - deal with conditions likely to give rise to VOC emissions,
 - minimising emissions on start up and shut down
 - action to minimise emissions during abnormal conditions.
29. A record of staff training and instruction, comprising the name of the trainee and the subject matter of the training, shall be maintained by the operator and made available to the Regulator on request.
30. A written record of all maintenance, carried out in accordance with Condition 2, shall be made available for inspection by the regulator on request.
31. The operator shall use best available techniques for preventing, or where this is not practical, reducing emissions from the installation.



SITE LOCATION PLAN



SPRAY BOOTH EMISSION POINTS SHOWN IN RED AND DUST EXTRACTION IN YELLOW.

EXPLANATORY NOTES

These notes do not form part of the Permit

This permit is given in relation to the requirements of the Pollution Prevention and Control Act 1999 and subordinate regulations. It must not be taken to replace any responsibilities you may have under workplace health and safety legislation.

This permit, in that it regulates only air pollution matters, does not absolve you of the responsibility of any other statutory requirement, such as any need to obtain planning permission, hazardous substances consent or Building Regulations approval from the Council. Discharge consents from the local sewage undertaking or a waste disposal licence from the Environment Agency may still be required.

This permit is covered by Secretary of State's Guidance and can be viewed via the following link:

<https://www.gov.uk/government/publications/original-coating-of-road-vehicles-and-trailers-process-guidance-note-647>

Secretary of State's Guidance
Original Coating of Road Vehicles
and Trailers

PG6/47(11) Revised June 2014

The operator will be liable to enforcement action where;

- (a) a change is made (without approval of the regulator) to the activities described in the permit,
- (b) any of the activities are carried on outside process boundary,
- (c) a new activity (as defined within the Environmental Permitting (England and Wales) Regulations 2016) is carried on without a proper permit, and
- (d) any of the conditions of the permit are breached.

An annual fee due on 1st April each year (currently chargeable per activity per annum but subject to change by statutory instrument) is payable to Malvern Hills District Council.

It is an offence to operate the prescribed activity without a current permit.

Anyone who is aggrieved by the conditions attached to a permit can appeal to the Secretary of State for the Environment, Food and Rural Affairs. Appeals must be made in accordance with the requirements of Regulation 31 and Schedule 6 of the EP regulations.

Appeals should be received by the Secretary of State for Environment, Food and Rural Affairs. The address is as follows:

The Planning Inspectorate
Environment Appeals Team
3A Eagle Wing
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN

Regulator Contact Details: Worcestershire Regulatory Services
Finepoint Way
Kidderminster
DY11 7WF

E-mail wrsenquiries@worcsregservices.gov.uk