

## Appendix 1



FAX NO. 01480 473418

19 April 2000

Mr. Tony Richards  
Inside Track  
Eaton Court  
St. Neots  
Cambridgeshire  
PE19 4AG

### **Standex UK**

Freshwater Road  
Dagenham  
Essex RM8 1RU  
Telephone (0208) 590 6030  
Fax (0208) 598 4520

Dear Mr. Richards.

### EPA Compliant Coatings

Further to my telephone conversation with Derek at Milton Keynes Paint, I write to confirm the following.

Guidance Note PG6/34 (98) Clause 32 defines compliant products under "1<sup>st</sup> List" and "2<sup>nd</sup> List".

Bodyshops >2tpa should have met the requirements of both lists by 01.04.98.

Bodyshops > 1tpa should have met the requirements of the 1<sup>st</sup> List by 01.04.97 and the 2<sup>nd</sup> List by 01.04.2000.

The table on the next page lists Standox Compliant products for both lists. Figures are in grams per litre, and apply to the products when mixed and ready for use. This is the maximum allowed for each product type.

All painting systems commonly used in vehicle refinishing are covered by the products listed.

Yours sincerely

A handwritten signature in black ink, appearing to read "Neville Dickson", written over a horizontal line.

Neville Dickson  
Product Manager



INVESTOR IN PEOPLE

**Appendix 1****STANDOX EPA COMPLIANT PRODUCTS REF: PG6/34(1998)**

Product Type	1st List	2nd List
Gunwash	850 Viton 777 Thinner	850 Viton 777 Thinner
Precleaner	850 Autospeed Preclean	200 Standohyd TB10
Wash Primer	780 Autospeed Wash Etch Primer Standex 1K Fullprimer	780 Autospeed Wash Etch Primer Standex 1K Fullprimer
Precoat	780 Standex 1K Fullprimer	250 Standohyd 1K Primer Filler Standohyd 2K-EP-Primer
Primer Surfacer	540 Standex 2K-HS-Filler	250 Standex 2K-VHS-Filler
Non Sand Surfacer	540 Standex 2K-Optifill	250 Standohyd 2K-EP-Non Sand Surfacer
Primer for Wet-on-Wet Topcoat Application	540 Standex 2K-Optifill	540 or 250 Standex 2K-Optifill (540) Standohyd 1K Primer Filler (250) Standohyd 2K-EP-Non Sand Surfacer (250)
Topcoats		
1-coat Conventional	480 2K-HS-Standocryl	420 2K-HS-Standocryl
2-coat Base & Clear	590 Standex Basecoats & Standex 2K-HS-Klarlack	420 Standohyd Basecoats & Standex 2K-HS-Klarlack
3-coat Base & Clear	640 Standex Basecoats & Standex 2K-HS-Klarlack	420 Standohyd Basecoats & Standex 2K-HS-Klarlack
Special Products	840	840
	All Standex Special Products as defined in PG6/34, e.g. Degreasers, Adhesion Primers, Plastic Painting Products etc are below 840g/l	

## Appendix 2



Harry Dalby Engineering Ltd

Gloucester Crescent, Wigston  
Leicester LE18 4YQ

Tel: (0116) 291 6000  
Fax: (0116) 291 6001

Email: [enquiries@dalby.co.uk](mailto:enquiries@dalby.co.uk)  
<http://www.dalby.co.uk>

Exel Automotive Management Services  
Eaton Court,  
St Neots,  
Cambridgeshire  
PE19 7DB

**For The Attention Of: Mr. Tony Richards**

Our Ref No: DJE/EXE/SB4133

2<sup>nd</sup> March 2001

Dear Mr. Richards,

**RE: CONFORMITY DOCUMENTS**

Please find enclosed the following document;

2 copies - E.U. Machinery/LEV certificate for your Vehicle Refinishing Complex.

Could I ask you to sign both copies of the EU/LEV form, keeping the original and returning to me, for my records the copy.

Please Note! This document is to prove to the local environmental agencies that your Spraybooth is set up correctly and conforms to the relevant regulations.

Thank you for your co-operation in this matter.

If you have further questions or require additional information, please contact the undersigned.

Yours sincerely

David Edwards  
Contract Engineer

Enc.



## Appendix 2



Harry Dalby Engineering Ltd

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Leicester LE18 4YQ

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### **E.U. MACHINERY DIRECTIVE - DECLARATION OF CONFORMITY / LOCAL EXHAUST VENTILATION (LEV) AND AIR CIRCULATION MACHINERY/PLANT - CERTIFICATE OF CONFORMITY**

#### **CONFORMITIES:**

1. **E.U. MACHINERY DIRECTIVE** (As Subsequently Amended).

**HARMONISED STANDARDS APPLIED** (viz product standard where applicable):

2. **HEALTH AND SAFETY AT WORK ACT: 1974.**
3. **ENVIRONMENTAL PROTECTION ACT: 1990 (EPA), AND THE FOLLOWING RELEVANT AND/OR APPROPRIATE CLAUSES FROM PROCESS GUIDANCE NOTES:**

PG6/20 Guidance - paint application in vehicle manufacturing.

PG6/41 Guidance - coating and re-coating of rail vehicles.

PG6/23 Guidance - coating of metal and plastic.

PG6/40 Guidance - coating and re-coating of aircraft and aircraft components.

PG6/34 Guidance - re-spraying of road vehicles

Other:

4. **COSHH REGULATIONS: 1999** (With regards to Local Exhaust Ventilation and Air Circulation Machinery).
5. **GAS SAFETY (Installation and Use) REGULATIONS: 1994.**
6. **THE ELECTRICITY AT WORK REGULATIONS: 1989** (With regards to the requirements for Hazardous Environments).
7. **BS 7671: 1992 REQUIREMENTS FOR ELECTRICAL INSTALLATIONS** (IEE Regulations 16<sup>th</sup> Edition).

#### **GUIDANCE:**

8. **HEALTH AND SAFETY EXECUTIVE GUIDANCE NOTE HSG 54, Maintenance, Examination and Testing of Local Exhaust Ventilation (LEV).**
9. **PRODUCT/EQUIPMENT DETAILS: VEHICLE REFINISHING COMPLEX**

### **EUROPEAN MACHINERY DIRECTIVE - DECLARATION OF CONFORMITY FOR DESIGN**

We hereby certify that the product/equipment summarised on Page 1 of 2 of this certificate complies with all the relevant Essential Health and Safety Requirements of the EC Machinery Directive 89/392/EEC as amended, and the National Laws and Regulations adopting this directive.

### **LOCAL EXHAUST VENTILATION (LEV) - CERTIFICATE OF CONFORMITY ON COMMISSIONING**

The product/equipment uses Local Exhaust Ventilation (LEV) and Air Circulation machinery/plant and as such complies with the relevant regulations from COSHH Regulations: 1999. Harmful emissions are controlled and comply with the Environmental Protection Act: 1990, and the above Process and Technical Guidance Notes as relevant.

This is to certify that on commissioning by the Dalby Approved Engineer, the product/equipment was adjusted to give a neutral or negative air pressure to prevent any risk of contaminated substances escaping from the area.

It is emphasized that it is the responsibility of the equipment owner/occupier/operator to check the area pressurization on a daily basis or before use and to make the necessary adjustments to the equipment. Also, to ensure that operatives working inside the area wear the appropriate personal protective equipment and respiratory protective equipment, and comply with the Operating Instructions and Maintenance Manual published by Dalby.

The Dalby Operating Instructions and Maintenance Manual details the relevant training required to operate the plant/equipment. It is recommended that the owner/occupier/operator read this manual very carefully before operating the plant/equipment.



**Appendix 2****MAINTENANCE**

For the product/equipment to retain and maintain its performance within the specified design parameters, it must be maintained on 'hours run' basis and in accordance with the Maintenance Manual, by qualified and competent engineering personnel. Failure to comply with this fundamental maintenance requirement may compromise International and/or National statutory legislation.

**Note 1:** This initial Local Exhaust Ventilation (LEV) Certificate of Conformity is only valid if the extract and input filter media is purchased from Dalby or from an approved supplier.

**Note 2:** In accordance with Regulation 9 of the Control of Substances Hazardous to Health Regulations: 1999, all Local Exhaust Ventilation (LEV) equipment shall receive Maintenance, Examination and Testing every 14 months, and another certificate issued to this effect by a qualified and competent engineer.

**MANUFACTURER:**

Contract and Service Manager/Engineering Manager:

Signature: *John Estevez*

Print Name: JOHN ESTEVEZ

Date: 02/03/01

Being the competent person appointed by the Manufacturer

Contract No: SB4133

Commissioning Date: 23/02/01

Harry Dalby Engineering Ltd  
Gloucester Crescent  
Wigston  
LEICESTER  
LE18 4YQ  
UNITED KINGDOM

**OWNER/OCCUPIER:**

I acknowledge that I have received a copy of the Operating Instructions and Maintenance Manual.

Signature: *[Signature]*

Print Name: *Philippas*

Position: *Ops Manager*

Date: 8/3/2001

ADDRESS:

EXEL AUTOMOTIVE MANAGEMENT SERVICES  
HANGER 94  
ALCONBURY AIRFIELD  
ALCONBURY  
CAMBRIDGESHIRE  
PE17 5WX

## **Appendix 3**

### **Notes to Condition 5 – Compliant Coatings**

- (a) High solvent content wash primers should only be used where it is necessary to achieve adhesion of subsequent coats on difficult, bare metal, surfaces such as aluminium, zinc plated, or galvanised metals. The use of such wash primers should be limited to not more than 5% of the total coating material usage except where etch primer is used to coat aluminium for the first time.
- (b) Primers for wet-on-wet topcoat application should only be permitted to contain 540g/l organic solvent where the topcoat to be subsequently applied is solvent borne.

- (c) This is the combined value for the solvent content of the base coat or coats and the clearcoat and should be calculated as follows:

for 2-coat base and clear topcoat systems, permissible solvent concentration in coating as applied (g/l) =  $[S_1 + 2(S_2)] / 3$

where,  $S_1$  is the solvent content, as applied, of the basecoat and  
 $S_2$  is the solvent content, as applied, of the clearcoat on each case.

for 3-coat base and clear systems, permissible solvent concentration in coating as applied (g/l) =  $[S_b + S_g + 2(S_c)] / 4$

where,  $S_b$  is the organic solvent content of the basecoat / intermediate colour,  
 $S_g$  is the organic solvent content of the ground coat / base colour, and  
 $S_c$  is the organic solvent content of the clearcoat, as applied, in each case.

- (d) (i) where a special product is supplied by the manufacturer or distributor the limit shown in condition 5 relates to the coating as applied.

(ii) where a special product is prepared from the mixing of an additive and a standard product, the permitted solvent content, as applied, will comply with the limit in condition 5. The permitted solvent content is determined as follows:

Permitted solvent content =  $[(M \times S3)+(N \times S4)+(P \times S5)] / 100$  grams per litre less water in the coating as applied, where

M is the percentage of the additive, less any water present in the additive, in the coating as applied  
S3 is the organic solvent content of the additive (g/l less water)  
N is the percentage of the standard product, less any water present in the product, in the coating as applied  
S4 is the permissible solvent content of the standard product  
P is the percentage of added thinners, less any water present in the thinners, in the coating as applied  
S5 is the solvent content of the thinners

## **GENERAL NOTES**

### **1. Implied Conditions**

It should be noted that Section 7(4) of the Act provides that, in relation to any aspect of the process not regulated by the conditions in this authorisation the best available techniques not entailing excessive cost shall be used:

- (i) for preventing the release of substances prescribed for air into the air, or where that is not practicable by such means, for reducing the release into the air of such substance to a minimum and for rendering harmless any such substances which are so released, and
- (ii) for rendering harmless to any other substances which might cause harm if released into the air.

### **2. Review**

The Local Authority will undertake a review of the conditions in this authorisation at least every 4 years or where complaint is attributable to the process an immediate review shall be undertaken.

### **3. Variation**

The Local Authority will ensure that the authorisation remains up to date in line with the objectives set out in section 7(2) of the Act. This may involve issuing a Variation Notice following amendment to the Secretary of State's Guidance Note or following receipt of any direction from the Secretary of State.

### **4. Appeal**

The operator can appeal in writing to the Secretary of State for the Environment against the conditions included in an authorisation or any refusal to vary the authorisation within six months of the date of the decision against which the appeal is made. Appeals will not put notices into abeyance, except in the case of revocation notices.

### **5. Transfer of Authorisation**

The holder of the authorisation may transfer it to a person who proposes to carry out the process in the holder's place. The person to whom the authorisation is transferred must notify the Local Authority within 21 days of the date of transfer and anyone who fails to do so is guilty of an offence.

### **6. Notification of Proposed Change**

The holder of the authorisation who wishes to make a relevant change in the process may at any time-

- (i) notify the enforcing authority in the prescribed form of the fact, and
- (ii) request the enforcing authority to make a determination, in relation to the proposed change, of the matters mentioned in note 7 below;

and a person making a request under paragraph (ii) shall furnish the enforcing authority with such information as may be prescribed or as the authority may by notice require.

## **7. Determination by Local Enforcing Authority**

On receiving a request under section 11 of the Environmental Protection Act 1990 (see note 6 above) the enforcing authority shall determine-

- (i) whether the proposed change would involve a breach of any condition of the authorisation;
- (ii) if it would not involve such a breach, whether the authority would be likely to vary the conditions of the authorisation as a result of the change;
- (iii) if it would involve such a breach, whether the authority would be likely to vary the conditions of the authorisation so that the change may be made; and
- (iv) whether the change would involve a substantial change in the manner in which the process is being carried on;

and the enforcing authority shall notify the holder of the authorisation of its determination of those matters.

## **8. Other Legal Requirements**

This Authorisation is issued solely for the purpose of Part 1 of the Environmental Protection Act 1990 and the Operator must ensure that he complies with all other statutory requirements.

## **9. Annual Subsistence Charge**

The Secretary of State has drawn up a charging scheme under Section 8 of the Environmental Protection Act 1990, Part 1. Under this scheme Local Authorities are required to levy an annual subsistence charge related to the authorisation. The Local Authority will invoice for the amount due which is subject to annual review by the Department of the Environment.