Cox Automotive UK Ltd / C. Walton Ltd Wyton - Application Responses Note 1:

Items included with the Application:

C. Walton Ltd Bodyshops - LAPPC Hunts District Council Application.doc
C. Walton Ltd Bodyshops Application Responses Note.doc (This document)

B1 Describe the proposed installation and activities and identify the foreseeable emissions to air from the process.

There are 3 (three) Refurbishment Centres, these comprise of Building 10, Building 14 that provide vehicle refurbishment services and Building 16 which provides vehicle wheel (alloy & steel) refurbishment, SMART, PDR (Paintless Dent Removal) and mechanical servicing all of which have become operational again in May 2020 (post lockdown).

All 3 (three) processes carry out the refurbishment of motor vehicles that are either new or at 'end of lease' that may require cosmetic (SMART) repair work to be carried out.

This may also entail the use of PDR (Paintless Dent Removal) processes or SMART repair techniques to panels (on or off the vehicle). Please note - the PDR process does not produce any emissions other than some infrequent noise from panel surface adjustment & re-alignment.

Emissions to air may occur during the SMART panel preparation process from mechanical or hand sanding of body-fillers however, in Building 10, dust emission is controlled by use of 10 (ten) Indasa mobile dust extraction units and in Building 14, dust emission is controlled by by use of 8 (eight) Indasa mobile dust extraction units and in Building 16, dust emission is controlled by use of 2 (two) Indasa mobile dust extraction units to ensure the control of fugitive body-filler dust emission.

Emissions to air may also occur during application of refinish products to vehicle panels, however, these emissions are controlled using 6 (Todd Engineering) spraybooths in Building 10, 6 (Todd Engineering) spraybooths in Building 14 and 1 (Todd Engineering) wheel bay refinishing spraybooth in Building 16.

B2 Once all foreseeable emissions have been identified in the proposed installation activities, each emission should be characterised (including odour) and quantified.

Atmospheric emissions should be categorised under the following:

(i) point source (e.g. chimney / vent, identified by a number and detailed on a plan)

Please see attached:

- Doc 3 - Cox / CWL Building 10 Spraybooths 1 to 4 Stack View
- Doc 4 - Cox / CWL Building 10 Spraybooths 5 to 6 Stack View
- Doc 6 - Cox / CWL Building 14 Spraybooths 1 to 4 Stack View
- Doc 7 - Cox / CWL Building 14 Spraybooths 5 to 6 Stack View
- Doc 9 - Cox / CWL Building 16 Spraybooth 1 Stack View

- Doc 12 - Olfactory Emissions Log

(ii) fugitive source (e.g. from stockpiles / storage areas).

All product storage areas (mainly in the PMR's) and emission points are illustrated in Bodyshop Process Layout Plans.

Please see attached:

- Doc 2 - Cox / CWL Building 10 Bodyshop Process Layout Plan
- Doc 5 - Cox / CWL Building 14 Bodyshop Process Layout Plan
- Doc 8 - Cox / CWL Building 16 Bodyshop Process Layout Plan

If any monitoring has been undertaken please provide the details of emission concentrations and quantify in terms of mass emissions. If no monitoring has been undertaken please state this.

Please see attached:

Building 10 - The spraybooths listed below have been installed in June / July 2020 by the manufacturers (Todd Engineering Limited) and have supplied the required commissioning documents including Certificates of Conformity DEFRA PG6/34 (11) after commissioning.

- Doc 63 - Cox / CWL - Building 10 Hercules Spraybooth 1 Installation & Test Documents
- Doc 64 - Cox / CWL - Building 10 Hercules Spraybooth 2 Installation & Test Documents
- Doc 65 - Cox / CWL - Building 10 Hercules Spraybooth 3 Installation & Test Documents
- Doc 66 - Cox / CWL - Building 10 Hercules Spraybooth 4 Installation & Test Documents
- Doc 67 - Cox / CWL - Building 10 Spartan Spraybooth 5 Installation & Test Documents
- Doc 68 - Cox / CWL - Building 10 Spartan Spraybooth 6 Installation & Test Documents

Building 14 - The spraybooths listed below were installed in September 2019 by the manufacturers (Todd Engineering Limited) and have supplied the required commissioning documents including Certificates of Conformity DEFRA PG6/34 (11) after commissioning.

- Doc 69 - Cox / CWL - Building 14 Hercules Spraybooth 1 Installation & Test Documents
- Doc 70 - Cox / CWL - Building 14 Hercules Spraybooth 2 Installation & Test Documents
- Doc 71 - Cox / CWL - Building 14 Hercules Spraybooth 3 Installation & Test Documents
- Doc 72 - Cox / CWL - Building 14 Hercules Spraybooth 4 Installation & Test Documents
- Doc 73 - Cox / CWL - Building 14 Hercules Spraybooth 5 Installation & Test Documents
- Doc 74 - Cox / CWL - Building 14 Hercules Spraybooth 6 Installation & Test Documents

Building 16 - The spraybooth listed below was installed in September 2019 by the manufacturers (Todd Engineering Limited) and have supplied the required service documents including a Certificate of Conformity DEFRA PG6/34 (11) after testing.

- Doc 75 - Cox-/ CWL - Building 16 Spartan Spraybooth 1 Conformity & Test Documents

Internal / external olfactory monitoring can be implemented if so required by the Regulator.

B3 For each emission identified from the installation's activities, describe the current and proposed technology and other techniques for preventing or, where that is not practicable reducing the emissions. If no techniques are currently used and the emission goes directly to the environment, without abatement or treatment, this should be stated.

Building 10 - The 4 (four) Todd Engineering Hercules 6000 Spraybooths (Full Floor Draft Plenum Extract) and the 2 (two) Todd Engineering Spartan 2000 side-loading primer preparation spraybooths (Rear Draft Plenum Extract) have full abatement and are maintained by Todd Engineering Limited.

Controls are incorporated via the computerised control panel that monitors and automates temperature control, automatic magnehelic / atmospheric pressure control (with limiter shutdown alarm) and time control of different modes of operation, including standby, spray, flash off, bake and cool down, a cabin pressure alarm is also incorporated into the spraybooths.

Spraybooths B10-#1 to 4 each incorporates a Todd Engineering Infra-Red Robotized 'Green Tech' Drying Arch which reduces VOC emissions and thus, the need for a prolonged conventional extracted 'Flash Off' and 'Bake Cycle'.

The supplied filter performance standard is to 10 mg/Nm^3 and all filter changes that are made / cut by internal staff or external service engineers are recorded in the Spraybooth Filter Change Log attached to each Spraybooth.

Paint Mixing facilities and Spraygun cleaning facilities are separate in bespoke Todd Engineering PMR's (Paint Mixing Room) with fully filtered LEV controls.

Building 14 - The 6 (six) Todd Engineering Hercules 6000 Spraybooths (Full Floor Draft Plenum Extract) have full abatement and are maintained by Todd Engineering Limited.

Controls are incorporated via the computerised control panel that monitors and automates temperature control, automatic magnehelic / atmospheric pressure control (with limiter shutdown alarm) and time control of different modes of operation, including standby, spray, flash off, bake and cool down, a cabin pressure alarm is also incorporated into the spraybooths.

Spraybooths B14-#2 and #3 each incorporate a Todd Engineering Infra-Red Robotized 'Green Tech' Drying Arch which reduces VOC emissions and thus, the need for a prolonged conventional extracted 'Flash Off' and 'Bake Cycle'.

Preparation & Paint areas in all 3 (three) refurbishment centres carries out hand and mechanical sanding of applied body fillers and substrates on body panels on or off vehicles, the particulate dust emission created is controlled by vacuum through Indasa Mobile Dust Extraction Units which captures particulate dust into an internal bag thus excessive dust emission to air is controlled.

The panel cleaning process utilise low solvent pre-cleaners on panels via pump dispensers that applies a minimal amount of panel cleaner to the cloth prior to the wiping of the panel's surface and disposed of after use in the lidded metal waste bins distributed throughout the bodyshops.

Building 16 – There is 1 (one) Spartan wheel bay Spraybooth (Side Draft Plenum Extract) for the carrying out of the re-spraying of refurbished vehicle road wheels, the Spraybooth perform at negative pressure using a manual magnehelic gauge (prior to application of refinish product), further controls are incorporated via the computerised control panel that monitors and automates temperature control, atmospheric pressure (with limiter shutdown alarm) and time control of different modes of operation, including standby, spray, flash off, bake and cool down, a cabin pressure alarm is also incorporated into the spraybooth.

Emissions to air from all the Todd Engineering Spraybooths are through the filtered side draft plenum which extracts and channels emissions up to the exhaust stack by high velocity extract fans through the stack (3.3 metres above roof ridge) and emitted to air.

The supplied filter performance standard is to 10 mg/Nm^3 and all filter changes that are made / cut by internal staff or external service engineers are recorded in the Spraybooth Filter Change Log attached to the spraybooth door.

The Paint Mixing Rooms (PMR) in Building 10 and Building 14 are situated externally at the side of the workshop preparation area and is specific to Mixing Room manufacturer requirements with fully controlled LEV – 1 metal cabinet within the Mixing Room contains ancillary products such as HS Lacquer and reducers.

The Paint Mixing Rooms (PMR) in Building 16 is situated next to the Spartan wheel bay Spraybooth.

A Bodyshop Start-up Work Instruction is displayed in all 3 building's notice boards or the relevant equipment which also provides details of procedures required to maintain the spraybooths and PMR's.

Please see attached:

- Doc 14 - Spraybooth Maintenance- Filter Change Log
- Doc 33 - MCS NOTICE - Bodyshop Start-up Work Instruction

B4 Describe the proposed systems to be used in the event of unintentional releases and their consequences. This must identify, assess and minimise the environmental risks and hazards, provide a risk based assessment of any likely unintentional releases, including the use of historical evidence. If no assessments have been carried out please state.

Main unintentional releases can take place with the movement of 25lt drums of solvent which are moved from supplier delivery vehicles to the mixing room and vice-versa for waste solvent however, decanting or pouring of liquids only take place within the confines of the paint mixing room – All 3 (three) Vehicle Refurbishment Centres have a spillage procedure and anti-spill equipment in place in the event of such an incident occurring.

Cox Automotive / CWL have an LAPPC Abnormal Emissions Log in place within our EMS for the purpose of reporting fugitive / abnormal emissions to the Regulator.

An individual Impact Assessment has also been carried out on all 3 building's processes including each Spraybooth and PMR's.

Please see attached:

- Doc 10 - LAPPC Abnormal Emissions Log
- Doc 36 - MCS NOTICE - Spillage Procedure

Including:

Building 10:

- Doc 44 - Cox / CWL - Building 10 Workshop Area Impact Assessment
- Doc 45 - Cox / CWL - Building 10 Paint Mixing Room Impact Assessment
- Doc 46 - Cox / CWL - Building 10 Hercules Spraybooth 1 Impact Assessment
- Doc 47 - Cox / CWL - Building 10 Hercules Spraybooth 2 Impact Assessment
- Doc 48 - Cox / CWL - Building 10 Hercules Spraybooth 3 Impact Assessment
- Doc 49 - Cox / CWL - Building 10 Hercules Spraybooth 4 Impact Assessment
- Doc 50 - Cox / CWL - Building 10 Spartan Spraybooth 5 Impact Assessment
- Doc 51 - Cox / CWL - Building 10 Spartan Spraybooth 6 Impact Assessment

Building 14:

- Doc 52 - Cox / CWL - Building 14 Workshop Area Impact Assessment
- Doc 53 - Cox / CWL - Building 14 Paint Mixing Room Impact Assessment
- Doc 54 - Cox / CWL - Building 14 Hercules Spraybooth 1 Impact Assessment
- Doc 55 - Cox / CWL - Building 14 Hercules Spraybooth 2 Impact Assessment
- Doc 56 - Cox / CWL - Building 14 Hercules Spraybooth 3 Impact Assessment
- Doc 57 - Cox / CWL - Building 14 Hercules Spraybooth 4 Impact Assessment
- Doc 58 - Cox / CWL - Building 14 Hercules Spraybooth 5 Impact Assessment
- Doc 59 - Cox / CWL - Building 14 Hercules Spraybooth 6 Impact Assessment

Building 16:

- Doc 60 - Cox / CWL - Building 16 Workshop Area Impact Assessment
- Doc 61 - Cox / CWL - Building 16 Paint Mixing Room Impact Assessment
- Doc 62 - Cox / CWL - Building 16 Spartan Spraybooth 1 Impact Assessment

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B5 Describe the proposed measures for monitoring all identified emissions including any environmental monitoring, and the frequency, measurement methodology and evaluation procedure proposed. (e.g. particulate matter emissions, odour etc). Include the details of any monitoring which has been carried out which has not been requested in any other part of this application. If no monitoring is proposed for an emission please state the reason.

Cox Automotive / CWL have an Olfactory Emissions Log in place within our EMS for the purpose of identifying external emissions such as smoke, coloured mist and odour which can be implemented if requested by the Regulator, additionally; periodic internal LEV checks on Spraybooths and dust extraction systems are carried out.

Please see attached:

- Doc 11 - Local Exhaust Ventilation Check List
- Doc 12 - Olfactory Emissions Log

B6 Provide detailed procedures and policies of your proposed environmental management techniques, in relation to the installation activities described.

Cox Automotive / CWL has introduced an EMS (Environmental Management System) in conjunction with the Health & Safety and Fire Control Management System which is being implemented by MCS Consultancy – the system also provides for guidance and information directly to employees (Please see response to **B12** for further details)

MCS Consultancy provide bespoke managed compliance systems to the motor industry that are written specifically for motor vehicle repair processes and equipment maintenance programs to underpin specific legislative requirements.

The Cox Automotive Environmental Policy is displayed and the Company Memo (as referred to in **B12**) issued to staff outlining the Company's Environmental Policy and staff adherence to the requirements.

Please see attached:

- Doc 30 - Cox Automotive Environmental Policy Statement 2020

B7 Attach a plan of the premises showing the location of:

(a) the premises
(b) spray booths
(c) organic solvent-containing material storage
(d) organic solvent-containing waste storage.

Please see attached:

- Doc 2 - Cox / CWL Building 10 Bodyshop Process Layout Plan
- Doc 5 - Cox / CWL Building 14 Bodyshop Process Layout Plan
- Doc 8 - Cox / CWL Building 16 Bodyshop Process Layout Plan

Cox Automotive / CWL also include a satellite view of the process which illustrates the location of the process in relation to the surrounding area.

Please see attached:

- Doc 1 - Cox / Walton Buildings 10 & 14 & 16 Satellite View & Nat Grid Ref

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B8 Supply a description of the location and methods of storage of organic solvent-containing materials.

All 25lt drums of cleaning solvent that are delivered from the supplier is stored in the paint mixing room away from the bodyshop processes to avoid damage and spillages, minimal amounts of solvents are now purchased as the SMART process is classified as 'cosmetic repairs in accordance with BS10125' which does not require significant refinish product application and bulk stock of refinish product and further due to the fact that most refinish products in use are water base products with the exception of some HS (High Solid) lacquers, activators & solvents which are stored in locked metal cabinets situated in the Mixing Room.

Please see attached:

- Doc 2 - Cox / CWL Building 10 Bodyshop Process Layout Plan
- Doc 5 - Cox / CWL Building 14 Bodyshop Process Layout Plan
- Doc 8 - Cox / CWL Building 16 Bodyshop Process Layout Plan

B9 Supply certification of spray booth performance

Testing & servicing of Spraybooth equipment is carried out bi-annually by Todd Engineering Limited aligned to a maintenance contract agreement, LEV Testing and Clearance Testing certificates are held on site in the MCS Consultancy Environmental Management System (Folder 7) for inspection by the Regulator.

Please see attached:

Building 10 - The spraybooths listed below have been installed in June / July 2020 by the manufacturers (Todd Engineering Limited) and have supplied the required commissioning documents including Certificates of Conformity DEFRA PG6/34 (11) after commissioning.

- Doc 63 - Cox / CWL - Building 10 Hercules Spraybooth 1 Installation & Test Documents
- Doc 64 - Cox / CWL - Building 10 Hercules Spraybooth 2 Installation & Test Documents
- Doc 65 - Cox / CWL - Building 10 Hercules Spraybooth 3 Installation & Test Documents
- Doc 66 - Cox / CWL - Building 10 Hercules Spraybooth 4 Installation & Test Documents
- Doc 67 - Cox / CWL - Building 10 Spartan Spraybooth 5 Installation & Test Documents
- Doc 68 - Cox / CWL - Building 10 Spartan Spraybooth 6 Installation & Test Documents

Building 14 - The spraybooths listed below were installed in September 2019 by the manufacturers (Todd Engineering Limited) and have supplied the required commissioning documents including Certificates of Conformity DEFRA PG6/34 (11) after commissioning.

- Doc 69 - Cox / CWL - Building 14 Hercules Spraybooth 1 Installation & Test Documents
- Doc 70 - Cox / CWL - Building 14 Hercules Spraybooth 2 Installation & Test Documents
- Doc 71 - Cox / CWL - Building 14 Hercules Spraybooth 3 Installation & Test Documents
- Doc 72 - Cox / CWL - Building 14 Hercules Spraybooth 4 Installation & Test Documents
- Doc 73 - Cox / CWL - Building 14 Hercules Spraybooth 5 Installation & Test Documents
- Doc 74 - Cox / CWL - Building 14 Hercules Spraybooth 6 Installation & Test Documents

Building 16 - The spraybooth listed below was installed in September 2019 by the manufacturers (Todd Engineering Limited) and have supplied the required service documents including a Certificate of Conformity DEFRA PG6/34 (11) after testing.

- Doc 75 - Cox-/ CWL - Building 16 Spartan Spraybooth 1 Conformity & Test Documents

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B11 Provide details how the mass of VOC emitted and of paint solids used will be determined and recorded

A VOC reconciliation of purchases and disposal will be periodically updated to provide information to the Regulator, of product usage and excess regulated solvent product (waste) disposal to monitor annual emissions through the Part B process, this is evidenced through data supplied by refinish product suppliers.

Please see attached:

Doc 40 - Cox Automotive / CWL VOC Reconciliation Log 2020
Doc 41 - Brown Bros VOC Statement - Jan 20 to July 20
Doc 42 - Movac JWAL005 VOC Statement - Jan 20 to July 20

Cox Automotive / CWL use only compliant coatings in our refinish processes, our purchased paint VOC content / potential emissions are controlled under the Paint Products Directive 2004/42/EC through Brown Brothers Limited and Movac Limited which stops paint manufacturers from supplying high solvent refinishing products in the EU for the re-spraying of road vehicles thus reducing VOC content in our supplied products under BAT (Best Available Techniques) and also reducing excessive aerial emission impact to the environment.

The use of compliant products is also underpinned by our Technicians adherence to the written manufacturer technical information on mixing, application and use of compliant product and further frequent Technician training on the use of product from the supplier / paint manufacturer.

Cox Automotive / CWL shall ensure to maintain that only compliant products are used within the Part B process.

Cox Automotive / CWL currently operates 2 (two) primary SMART paint mixing schemes in all 3 (three) PMR's – Spies Hecker Permahyd which is a water-based topcoat product and Spies Hecker Permafleet which is a 2K topcoat compliant product to facilitate the warrantee requirements of our German vehicle manufacturer clients.

Other products / schemes in use are PPG Envirobase and Ceramiclear for generic manufactured vehicles but are soon to be phased out due to commercial decisions and the on-going 'specific technical requirements' of our clients.

Technical Data Sheets (TDS) and Material Safety Data Sheets (MSDS) are directly available on line with all our manufacturer product suppliers.

B12 Provide a written plan for the maintenance, inspection and replacement of extract air filters of the spray booth and abrasive blasting equipment plant.

All Cox Automotive / CWL Wyton Bodyshop equipment are subject to a maintenance and inspection program in conjunction with the MCS System - Managed Compliance System - Folder 7 (Environmental Management System) and VOC & Waste Control, maintenance certificates are kept on site in the MCS System for inspection by the Regulator.

Please see attached:

- Doc 13 - Spraybooth Cleaning & Maintenance Log
- Doc 12 - Olfactory Emissions Log (where required)
- Doc 14 - Spraybooth Maintenance- Filter Change Log
- Doc 33 - MCS NOTICE - Bodyshop Start-up Work Instruction
- Doc 77 - Euroblast SF Instruction Manual
- Doc 78 - Guyson Wheelmaster Brochure

B13 Provide a written plan for measuring particulate emissions from abrasive blasting equipment, using manual extractive testing methods.

Cox Automotive / CWL have no current written plan for measuring particulate emissions from abrasive blasting equipment, the two Guyson Wheelmaster units which are little used are suction fed units and all abrasive is captured / recycled into the hopper bags with no emission to atmosphere, we have provided the specification documentation from the suppliers of the (alloy wheels) sand blasting unit, a full operation manual is on site.

Please see attached:

- Doc 77 - Euroblast SF Instruction Manual
- Doc 78 - Guyson Wheelmaster Brochure

B14 Provide a written plan for control of VOC emissions from spray gun testing and sprayout following cleaning.

All spraygun testing and spray-out (cleaning solvent purging) following cleaning is carried out within the Spraygun cleaning machines in all 3 mixing rooms, sprayout colour test cards are sprayed within the spraybooths with the extraction system running (in spray cycle).

Please see attached:

- Doc 18 - Memo - Spray Gun Cleaning Procedure
- Doc 33 - MCS NOTICE - Bodyshop Start-up Work Instruction

B15 Provide a written plan for the control of VOC emissions from spray gun and equipment cleaning.

All spraygun cleaning is carried out in an enclosed automatic equipment cleaning machine provided under contract with Safety Kleen.

The dual purpose (aqua & solvent) Spraygun cleaning machines provided in all 3 PMR's are within the required minimum of exhaust ventilation to prevent VOC fugitive emissions when the machine is opened for introduction or removal of Sprayguns and for the changing of cleaning solvent.

Where excessive solvent waste is produced by the business and requires removal from site for off-site recycling by a regulated waste transfer company (Safety Kleen Limited), all copies of receipts of waste materials transferred (consignment notes) for off-site recycling will be kept for three years.

Please see attached:

- Doc 33 - MCS NOTICE - Bodyshop Start-up Work Instruction
- Doc 39 - MCS NOTICE - Spray Gun Cleaning Procedure

B16 Provide a written plan for the control of VOC emissions from solvent contaminated wipes and other wastes.

Cox Automotive / CWL provide directives and Work Instructions (Standard Operating Procedures) to staff specifically aligned to the control of emissions and waste during the various repair processes. (Please see response to **B18** for further details)

Waste generated is transferred to bespoke / marked waste bins, these waste types include:

- waste solvents
- empty refinish product waste tins and containers
- contaminated panel wipe materials
- contaminated masking papers and tape
- used Spraybooth filters
- workshop dust / filler dust

The above waste types are controlled by the general waste transfer contractor who is Bumpers4u Ltd and Biffa Waste Services Ltd who handle general, metal, plastic and cardboard waste etc..

Waste Solvent is controlled by Safety Kleen UK Ltd along with a monthly maintenance contract for all gunwash machines.

Please see attached:

- Doc 15 - Cox / CWL Wyton Waste Disposal Log
- Doc 33 - MCS NOTICE - Bodyshop Start-up Work Instruction

B17 State whether any structured environmental management system (such as ISO 14001, EMAS or BS8555) or a tailored system is being used or is planned, and if so what.

The business is implementing the MCS System - a motor industry specific Managed Compliance System – comprising of 7 Management & Control folders covering Health & Safety, Fire Control and particularly, Environmental Management within the following section: Folder 7 (Environmental Management System) and VOC & Waste Control.

The system, particularly the Environmental Management System, is available for viewing by the Regulator.

Cox Automotive are ISO 14001:2015 Certificated - Certificate Number E 6025/21

Please see attached:

- Doc 76 - Cox Automotive UK Ltd BS EN ISO 14001 2015 Certificate

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B18 Specify what training and instruction staff will be given to ensure that this permit (if granted) is complied with.

Please see attached:

Cox Automotive / CWL have introduced the following SOP controls to staff:

- Doc 23 - Work Instruction - SOP 1 - Spraybooth Filters
- Doc 24 - Work Instruction - SOP 2 - Spillage Procedure
- Doc 25 - Work Instruction - SOP 3 - Waste Disposal
- Doc 26 - Work Instruction - SOP 4 - Olfactory Log
- Doc 27 - Work Instruction - SOP 5 - Abnormal Emissions
- Doc 28 - Work Instruction - SOP 6 - Spraybooth Cleaning

These are underpinned with the issue of instructive staff memos that require signatures by the employee / subcontractor as acknowledgement of compliance:

- Doc 16 - Memo to Staff - Environmental Awareness
- Doc 17 - Cox Automotive Environmental Awareness Guidance
- Doc 18 - Memo - Spray Gun Cleaning Procedure
- Doc 19 - Memo - The Company's Environmental Policy
- Doc 20 - Memo to Staff - Dust Extract Control
- Doc 21 - Memo to Staff - Dry Waste Control
- Doc 22 - Memo to Staff- Wet Waste Control

The document - Doc 17 - Cox Automotive Environmental Awareness Guidance attachment is a guidance document which is attached to the Memo - Doc 16 - Memo to Staff - Environmental Awareness, this explains through a PDF printed document of the presentation slides issued to staff, this ensures that staff absorb the content of the guidance module for them to understand their legal obligations to compliance of the EPA and the Company's directives to maintain that legal obligation.

Please Note: due to the company's Corporate Social Responsibility, HR and Equal Opportunities policies, employment of our site management and operatives are sourced locally and through our preferred contract employment agency service provider (predominately Polish and Romanian personnel), thus all our Staff Memos, Guidance and Standard Operating Procedures are issued in English, Polish and Romanian languages to ensure that clear instructions are delivered.

Further to this, a 'Statement of Environmental Guidance Delivery' document is completed once the guidance module has been delivered to each of the participating employees.

- Doc 29 - Statement of Environmental Guidance Delivery

B19 Provide an assessment of the potential significant local environmental effects of the foreseeable emissions (for example, is there a history of complaints, is the installation in an air quality management area?)

Although there is no history of complaints, Cox Automotive / CWL has created an initial Environmental Impact Assessment which is focussed on the equipment and the process that takes into account any local impact from a release of (unintentional / fugitive) emissions or foreseeable hazards within any of the processes on site which will be reported, actioned, recorded and periodically reviewed as required. The area in which the processes take place is in an industrial area however, Cox Automotive / CWL is unaware if the location is an air quality management area, no complaints have been registered against the business since occupation. (Please see response to **B4** for further details)

Please see attached:

- Doc 1 - Cox / Walton Buildings 10 & 14 & 16 Satellite View & Nat Grid Ref

Building 10:

- Doc 44 - Cox / CWL - Building 10 Workshop Area Impact Assessment
- Doc 45 - Cox / CWL - Building 10 Paint Mixing Room Impact Assessment
- Doc 46 - Cox / CWL - Building 10 Hercules Spraybooth 1 Impact Assessment
- Doc 47 - Cox / CWL - Building 10 Hercules Spraybooth 2 Impact Assessment
- Doc 48 - Cox / CWL - Building 10 Hercules Spraybooth 3 Impact Assessment
- Doc 49 - Cox / CWL - Building 10 Hercules Spraybooth 4 Impact Assessment
- Doc 50 - Cox / CWL - Building 10 Spartan Spraybooth 5 Impact Assessment
- Doc 51 - Cox / CWL - Building 10 Spartan Spraybooth 6 Impact Assessment

Building 14:

- Doc 52 - Cox / CWL - Building 14 Workshop Area Impact Assessment
- Doc 53 - Cox / CWL - Building 14 Paint Mixing Room Impact Assessment
- Doc 54 - Cox / CWL - Building 14 Hercules Spraybooth 1 Impact Assessment
- Doc 55 - Cox / CWL - Building 14 Hercules Spraybooth 2 Impact Assessment
- Doc 56 - Cox / CWL - Building 14 Hercules Spraybooth 3 Impact Assessment
- Doc 57 - Cox / CWL - Building 14 Hercules Spraybooth 4 Impact Assessment
- Doc 58 - Cox / CWL - Building 14 Hercules Spraybooth 5 Impact Assessment
- Doc 59 - Cox / CWL - Building 14 Hercules Spraybooth 6 Impact Assessment

Building 16:

- Doc 60 - Cox / CWL - Building 16 Workshop Area Impact Assessment
- Doc 61 - Cox / CWL - Building 16 Paint Mixing Room Impact Assessment
- Doc 62 - Cox / CWL - Building 16 Spartan Spraybooth 1 Impact Assessment

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B22 Additional Information

Please supply any additional information, which you would like us to take account of in considering this application.

Cox Automotive / CWL have produced various policies and directives to staff to ensure compliance in all areas of the process, in particular, the display of bespoke notices:

Please see attached:

- Doc 31 - MCS NOTICE - Lids On VOCs
- Doc 32 - MCS NOTICE - PDR Area Housekeeping
- Doc 33 - MCS NOTICE - Bodyshop Start-up Work Instruction
- Doc 34 - MCS NOTICE - Magnehelic Control Instructions (Spraybooth B16-1)
- Doc 35 - MCS NOTICE - Spraybooth Housekeeping
- Doc 36 - MCS NOTICE - Spillage Procedure
- Doc 37 - MCS NOTICE - Paint Mixing Room Housekeeping
- Doc 38 - MCS NOTICE - MET Area Housekeeping
- Doc 39 - MCS NOTICE - Spray Gun Cleaning Procedure

Cox Automotive UK Ltd / C. Walton Ltd Wyton - Application Support Document List

Doc 1 - Cox / Walton Buildings 10 & 14 & 16 Satellite View & Nat Grid Ref
Doc 2 - Cox / CWL Building 10 Bodyshop Process Layout Plan
Doc 3 - Cox / CWL Building 10 Spraybooths 1 to 4 Stack View
Doc 4 - Cox / CWL Building 10 Spraybooths 5 to 6 Stack View
Doc 5 - Cox / CWL Building 14 Bodyshop Process Layout Plan
Doc 6 - Cox / CWL Building 14 Spraybooths 1 to 4 Stack View
Doc 7 - Cox / CWL Building 14 Spraybooths 5 to 6 Stack View
Doc 8 - Cox / CWL Building 16 Bodyshop Process Layout Plan
Doc 9 - Cox / CWL Building 16 Spraybooth 1 Stack View
Doc 10 - LAPPC Abnormal Emissions Log
Doc 11 - Local Exhaust Ventilation Check List
Doc 12 - Olfactory Emissions Log
Doc 13 - Spraybooth Cleaning & Maintenance Log
Doc 14 - Spraybooth Maintenance- Filter Change Log
Doc 15 - Cox / CWL Wyton Waste Disposal Log
Doc 16 - Memo to Staff - Environmental Awareness
Doc 17 - Cox Automotive Environmental Awareness Guidance
Doc 18 - Memo - Spray Gun Cleaning Procedure
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Doc 22 - Memo to Staff- Wet Waste Control
Doc 23 - Work Instruction - SOP 1 - Spraybooth Filters
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Doc 28 - Work Instruction - SOP 6 - Spraybooth Cleaning
Doc 29 - Statement of Environmental Guidance Delivery
Doc 30 - Cox Automotive Environmental Policy Statement 2020
Doc 31 - MCS NOTICE - Lids On VOCs
Doc 32 - MCS NOTICE - PDR Area Housekeeping
Doc 33 - MCS NOTICE - Bodyshop Start-up Work Instruction
Doc 34 - MCS NOTICE - Magnehelic Control Instructions (Spraybooth B16-1)
Doc 35 - MCS NOTICE - Spraybooth Housekeeping
Doc 36 - MCS NOTICE - Spillage Procedure
Doc 37 - MCS NOTICE - Paint Mixing Room Housekeeping
Doc 38 - MCS NOTICE - MET Area Housekeeping
Doc 39 - MCS NOTICE - Spray Gun Cleaning Procedure
Doc 40 - Cox Automotive / CWL VOC Reconciliation Log 2020
Doc 41 - Brown Bros VOC Statement - Jan 20 to July 20
Doc 42 - Movac JWAL005 VOC Statement - Jan 20 to July 20
Doc 43 - Cox / CWL - Bumpers4U Example Waste Transfer Notes

Doc 44 - Cox / CWL - Building 10 Workshop Area Impact Assessment
Doc 45 - Cox / CWL - Building 10 Paint Mixing Room Impact Assessment
Doc 46 - Cox / CWL - Building 10 Hercules Spraybooth 1 Impact Assessment
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Cox Automotive UK Ltd / C. Walton Ltd Wyton - Application Support Document List

Doc 49 - Cox / CWL - Building 10 Hercules Spraybooth 4 Impact Assessment
Doc 50 - Cox / CWL - Building 10 Spartan Spraybooth 5 Impact Assessment
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Doc 55 - Cox / CWL - Building 14 Hercules Spraybooth 2 Impact Assessment
Doc 56 - Cox / CWL - Building 14 Hercules Spraybooth 3 Impact Assessment
Doc 57 - Cox / CWL - Building 14 Hercules Spraybooth 4 Impact Assessment
Doc 58 - Cox / CWL - Building 14 Hercules Spraybooth 5 Impact Assessment
Doc 59 - Cox / CWL - Building 14 Hercules Spraybooth 6 Impact Assessment

Doc 60 - Cox / CWL - Building 16 Workshop Area Impact Assessment
Doc 61 - Cox / CWL - Building 16 Paint Mixing Room Impact Assessment
Doc 62 - Cox / CWL - Building 16 Spartan Spraybooth 1 Impact Assessment

Doc 63 - Cox / CWL - Building 10 Hercules Spraybooth 1 Installation & Test Documents
Doc 64 - Cox / CWL - Building 10 Hercules Spraybooth 2 Installation & Test Documents
Doc 65 - Cox / CWL - Building 10 Hercules Spraybooth 3 Installation & Test Documents
Doc 66 - Cox / CWL - Building 10 Hercules Spraybooth 4 Installation & Test Documents
Doc 67 - Cox / CWL - Building 10 Spartan Spraybooth 5 Installation & Test Documents
Doc 68 - Cox / CWL - Building 10 Spartan Spraybooth 6 Installation & Test Documents

Doc 69 - Cox / CWL - Building 14 Hercules Spraybooth 1 Installation & Test Documents
Doc 70 - Cox / CWL - Building 14 Hercules Spraybooth 2 Installation & Test Documents
Doc 71 - Cox / CWL - Building 14 Hercules Spraybooth 3 Installation & Test Documents
Doc 72 - Cox / CWL - Building 14 Hercules Spraybooth 4 Installation & Test Documents
Doc 73 - Cox / CWL - Building 14 Hercules Spraybooth 5 Installation & Test Documents
Doc 74 - Cox / CWL - Building 14 Hercules Spraybooth 6 Installation & Test Documents

Doc 75 - Cox-/ CWL - Building 16 Spartan Spraybooth 1 Conformity & Test Documents

Doc 76 - Cox Automotive UK Ltd BS EN ISO 14001 2015 Certificate

Doc 77 - Euroblast SF Instruction Manual
Doc 78 - Guyson Wheelmaster Brochure