Morgans ofUsk Ltd	Environmental Aspect Evaluation and Risk Assessment	MOU-ENV-F09 Rev 0 – Jul 2022

Assessment ref:	*01 – Workshop Painting activities*	REV: 0

Environmental Aspect:	**Application of paint by spray or brush in the paint shop** The majority of the steelwork manufactured on site is painted prior to despatch to the customer / erection site. This is normally done by airless spray in the Paint Shop, although minor touch up of damaged areas by roller may occur elsewhere on site.
Impact:	**Release of Volatile Organic Compounds (VOC's) to the atmosphere / spillages entering surface water drains, onto ground or entering foul water system.** The paints used contain VOC's and legislation seeks to control their emissions to the atmosphere when a certain threshold is reached. The paint spraying process is a prescribed process under the Environmental Protection Act. Currently all solvent releases from the process are fugitive. Spillage's may also enter surface water drains, and potential contamination of ground. The paint shop facility is within ½ Km of the River Usk, which is a registered SSSI site. The activity has been identified as a "Part B" activity under Environmental permitting (England & Wales) regulations 2016. The paint shop is also identified as an "A2" facility under the EP Regulations.
Control Measures:	- Paint is purchased in bulk via 1000L IBC's but on a Just in Time basis as required in steel lined IBCs, and stored away from surface drains. - All paint storage and the usage point in the paint shop has a chemical spill kit, as well as rubber drain covers – storage is in excess of 10m from any open drains. - The activity has been scored using the LAPPC risk method as a "Medium Risk" activity. - Waste is not stored on site. When a waste IBC is filled, collection from the licenced Haz contractor (Safety Kleen) is arranged within a few days. - Noted that fugitive emissions from the single pack product use does not produce significant odours outside of the paint shop, and there have been no complaints from neighbours. - The use of single pack product reduces the need for cleaning solvent, and the spraying system is closed off when not in use with minimal emissions. - All containers are kept covered or closed when not in use. - Increase in production / turnover has identified that solvent use will exceed level where permitting is required (5T emitted VOC) - Level of solvent usage is being monitored – prepare annual Solvent management plan and submit to Council where required. - Air monitoring conducted and results show that emitted levels of VOC compounds do not and will not exceed concentration limits (> 150Kg/m³ per hour or > 200T per year) - Company operates an audited EMS accredited to BS 8555 - Although lighting in the paint shop could not be classed as "intrinsically safe", they are of enclosed LED construction, so are very low risk considering the volume of the paint shop.

	- COSHH assessments are completed for all materials used, and contents and controls measures communicated to all relevant staff, as well as bespoke paint training and safety guidance for using high pressure spray lines and paint equipment. Training also includes good spraying technique to not over apply. - Housekeeping regime in place to ensure dust and overspray is controlled to acceptable levels – Also highlighted in DSEAR Risk assessment for the facility. - Fire Risk Assessment also completed covering the paint shop and spraying activities. All pumps and paint trestles earther to reduce risk of static discharge to produce a spark / ignition source.			
Assessment of Risk to the Environment:	*Paint permit application requires and assessment of risk as per the Conservation (Natural Habitats etc) Regulations 1994 (see appendix 2 of Annex XVIII of the General Guidance Manual):* Reviewing the information in the guidance notes, the majority of risk is noted being considered for waste incineration plants or burning of waste at the facility. This is not the case with this activity. As the main risk to the SSSI is spill into the water source, the Emissions to air are considered to be significant and in isolation present a low risk of contamination to the SSSI.			
Improvement Action(s):	**1**	Application for granting of Paint permit for a Part B activity to be submitted to Local authority (Monmouthshire County Council)		
		Action Date:	August 2022	
	2	Implement procedure to ensure minimum amount of material is left in IBC when empty, and double checking prior to loading out. This reduces cost, waste material, and the waste processor who cleans IBCs will surcharge any excess materials left in the IBC		
		Action Date:	14/06/2022	
	3	Local exhaust ventilation equipment to be installed in paint shop to help divert fugitive emission from doorways and away from local residents / neighbours. Prices and solutions received, to be included in long term capital improvements for the site. (Noted small level of local LEV in place on parts washer – inspected & serviced by waste contractor, SafetyKleen Ltd)		
		Action Date:	Target June 2023	
	4			
		Action Date:		
Evaluated by:	Roger Trueman		**Dated:**	29/07/2022
Checked by:	Quickstep Environmental Ltd		**Dated:**	04/08/2022