



Environmental Permitting (England and Wales) Regulations 2016 (as amended)

A2 Process Inspection Form

Operator Name: Jaguar Land Rover

Registered Process: Vehicle Coating

Site Contact: [REDACTED]

Position: Halewood Senior Environmental Rep

Reason for visit: Compliance

Date of visit: 19th March 2026

Observations:

1. Process changes:

New RTO in the process of being installed

2. Emission Controls:

Site has 3 operational RTO's
Robotic and Electrocoating spraying process
Enclosed spraybooths with filtration system
Water treatment plant
Paint mix room operates using a closed loop system

3. Monitoring, Sampling & Measurement of Emission:

Monitoring of emissions to sewer and air carried out as agreed.
Results are provided as part of the 2025 IPPC Report – no issues.

4. Log Book:

Records as required by the permit held in a computerised system.

5. General Process Operation:

The site operates under an effective Environmental Management System.
The housekeeping on site is very good.

6. Comments:

The site's 2025 IPPC draft report had been reviewed and discussed. Our comments were as follows:

- An explanation was provided for the peak in April on the mass balance summary (decrease in the number of vehicles going through the paint process) and the decrease in September (cyber-attack).
- Takt time was explained – it is the pace of the production.
- We discussed the solvent usage data as your total solvent consumption stated in the report (112,392kg) was lower than the actual emissions in the mass balance summary table (141,567kg). You are to look into these figures.
- Some wording was repeated in the solvent management plan development paragraph, page 7 of 27.
- On the summary of continuous monitoring table, the entry on the 25 March 2025 covers a half hour period. Was there only one 15-minute exceedance?
- The reason for the incinerator breaches was due to a damper limit switch not set correctly. When was the issue rectified? Can this date be stated.
- For the RTO in bypass you have reported, can this be put into a separate table. The table needs to include, the specific RTO being referred to, the reason for going into by-pass, the start and finish time of being in bypass, and the date the issue was rectified. Under the permit, recording this information would fall under condition 3.1.5(b).
- We queried why the VOC level in Contrast 79 stack was significantly higher than the other stacks. Thinking about it, is the extraction in this booth working as effectively as the others?
- In Table 3b the figure for total electricity use in 2025 is different from that in table 3a. (just looks like a typo)
- We confirmed that during the commissioning of the new RTO the performance checks will be recorded.
- In Table 4.2 'Waste Data', the columns need headings, and the units are needed too.
- In Table 4a 'Hazardous Waste Data', in the final destination and method of disposal column, are you able to ensure the percentage adds up to 100%? For example, for Hyrdopurge, it states 5% goes to landfill. Where does the other 95% go?

- For Tables 5a and 5b can you include a brief comment on the trend, including reasons for and highs and lows.
- For the tank drops, Section 5.1 states weekly tank drops are still performed but then under 5.2 water initiatives it states there have been changes in the tank drop frequencies. If there are different tanks emptied at different frequencies, can you please state which tanks require drops and the frequency of each of them.
- Hazard rating of some solvents to be looked into. This includes Mibk and Aliphatic Naptha.
- In the raw material table can you name hydropurge, as it is referenced as a number not the name.
- Regarding the solvent management plan, it did contain a lot of good information although, as discussed, the solvent calculations need reviewing in line with the guidance, Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control). I have attached the relevant section from the guidance showing the calculation. Ultimately, you need to show the total input of solvent for the process and then determine the various outputs for each stage of your process. If for some stages there is no output of solvent, then this needs to be stated, along with an explanation as to why. An extension until June 30th 2026 has been granted for the submission of the revised Solvent Management Plan.

7. Risk Assessment Category:

The site has been categorised as a low risk site.

Knowsley Council Officers:

