



## Permit IPPC3

Environmental Permitting (England and Wales) Regulations 2016

**RPC Bpi Protec Worcester  
Blackpole Training Estate (East)  
Worcester  
WR3 8ZL**

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## Introductory note

***This introductory note does not form a part of the Permit.***

The following permit is granted under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016 (“the PPC regulations”). This permit authorises RPC Bpi Protec Worcester (“the operator”) to operate its installation at Blackpole Trading Estate (East) (“the site”) subject to the conditions in this permit.

The **installation** is made up of a stationary technical unit and the locations on the site where directly associated activities are carried out which have a technical connection with the activities carried out in the stationary technical unit and which could have an effect on pollution.

The **stationary technical unit** comprises the printing department with seven flexographic printing presses, where an activity listed in Part A(2) of Section 6.4 of Part 2 of Schedule 1 and Schedule 14 of the PPC regulations is carried out. It is considered to be a single stationary technical unit as the directly associated activities serve each part of the unit. The listed activity is the surface treatment of objects or products using organic solvents, in particular for coating, in plant with a consumption capacity of more than 150 kg per hour or more than 200 tonnes per year.

The **directly associated activities** are the raw materials receipt, storage and handling; the weighing and mixing of inks; the conversion and slitting processes; the handling, storage and distribution of finished goods; the handling, disposal and recovery of waste; all abatement and utilities plant, and all associated process, management and control operations.

The operator shall use the best available techniques for preventing or, where that is not practicable, reducing emissions from the installation.

“Best available techniques” has the meaning given in Article 3(10) of the Industrial Emissions Directive.

## Confidentiality

The permit requires RPC Bpi Protec Worcester to provide information to Worcester City Council. Worcester City Council will place this information in the register in accordance with the requirements of the PPC regulations. If RPC Bpi Protec Worcester considers that any information provided is commercially confidential, it may apply to Worcester City Council to have such information withheld from the register as provided in regulation 48. To enable Worcester City Council to determine whether the information is commercially confidential, RPC Bpi Protec Worcester should clearly identify the information in question and should specify clear and precise reasons.

## Variations to the permit

This permit may be varied in the future.

## Surrender of the permit

Before this permit can be wholly or partially surrendered, an application to surrender the permit has to be made. For the applicant to be successful, it has to demonstrate to Worcester City Council, in accordance with regulation 24, that there is no pollution risk and that no further steps are required to return the site to a satisfactory state.

## Transfer of the permit or part of the permit

Before the permit can be wholly or partially transferred to another person, a joint application to transfer the permit has to be made by both the existing and proposed holders, in accordance with regulation 21. A transfer will be allowed unless the Worcester City Council considers that the proposed holder will not be the person who will have control over the operation of the installation or will not ensure compliance with the conditions of the transferred permit.

## Status log

<b>Detail</b>	<b>Date</b>
Application	29 July 2003
Schedule 4 notice	13 November 2003
Schedule 4 notice response	2 August 2004
Permit	31 October 2004
Revised Permit	16 November 2017
Operator Head Office Change	19 February 2019

## Permit

Environmental Permitting (England and Wales)  
Regulations 2016



## Permit

The Worcester City Council in exercise of its powers under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016 hereby grants a permit to:

**British Polythene Limited** ("the operator", company registration number 00350729)

whose registered office is:

Sapphire House, Crown Way, Rushden, Northamptonshire, NN10 6FB.

to operate an installation at:

**RPC Bpi Protec Worcester  
Blackpole Trading Estate (East)  
Worcester  
WR3 8ZL**

subject to the conditions included in this permit.

Signed

A handwritten signature in black ink, appearing to read "S.R. Williams".

S.R. Williams

**Senior Technical Officer**

Authorised to sign on behalf of the Worcester City Council

Date: 19 February 2019

## **Conditions**

### 1.1 **The installation and activities**

1.1.1 The operator is authorised to carry out the activities and the associated activities specified in Table 1.1.1.

**Table 1.1.1**

<b>Activity</b>	<b>Reference</b>
Surface treatment of objects or products using organic solvents, in particular for printing, in plant with a consumption capacity of more than 150 kg per hour or more than 200 tonnes per year	Schedule 1, Part 2, Chapter 6, Section 6.4, Part A(2) & Schedule 14
Raw materials receipt and storage	Directly associated activity
Weighing and mixing of inks	Directly associated activity
Solvent dispensing	Directly associated activity
Printing	Directly associated activity
Conversion and slitting plant	Directly associated activity
Machine and surface cleaning	Directly associated activity
Solvent recovery	Directly associated activity
Waste handling and disposal	Directly associated activity
Abatement plant	Directly associated activity

### 1.2 **The site**

1.2.1 The activities authorised under condition 1.1.1 above shall not extend beyond the installation, whose boundary is marked in red on the plan in Appendix 1

## 2 Operational matters

### 2.1 **Techniques, control and operation**

- 2.1.1 All plant, equipment and technical means used in operating the installation shall be maintained in good operating condition.
- 2.1.2 Operation of the installation shall be supervised by staff that are suitably trained and fully conversant with the requirements of this permit.
- 2.1.3 A copy of this permit and those parts of the application referred to in this permit shall be available, at all times, for reference by all staff carrying out work subject to the requirements of the permit.
- 2.1.4 All staff shall be fully conversant with those aspects of the permit conditions that are relevant to their duties and shall be provided with appropriate training and written operating instructions to enable them to carry out their duties.
- 2.1.5 Any discharges of VOCs shall be released under contained conditions as far as technically and economically feasible to safeguard public health and the environment.
- 2.1.6 Replacement abatement plant for VOC shall be designed to meet the appropriate standards specified in the Directive for new installations or activities.
- 2.1.7 The operator shall ensure that all operations which generate emissions to air are adequately contained and extracted to suitable abatement plant, where this is necessary to meet specified emission limits.
- 2.1.8 The operator shall ensure that flues and ductwork are cleaned to prevent accumulation of materials, as part of the routine maintenance programme.
- 2.1.9 Where possible, ductwork shall be sufficiently lagged to prevent condensation of liquids, in particular solvents, within the duct.
- 2.1.10 Ductwork shall be enclosed and sealed to prevent fugitive loss of VOC.
- 2.1.11 Combustion processes shall use low-NO<sub>x</sub> burners.
- 2.1.12 Where possible the application of the printing shall be carried out in contained conditions.
- 2.1.13 Application of cleaning organic solvents shall be from a contained device or automatic system when applied directly.
- 2.1.14 Enclosed cleaning systems shall be used wherever possible.
- 2.1.15 All drying ovens shall be operated under balanced or negative pressure to reduce VOC emissions at entry and exit point. All other apertures within the oven shall be sealed sufficiently.
- 2.1.16 Drying systems shall be operated to maximise the drying efficiency.
- 2.1.17 Essential spares and consumables shall be held on site or be available at short notice from suppliers, so that plant breakdown can be rectified rapidly.
- 2.1.18 A high standard of housekeeping shall be maintained.

## 2.2 **Raw materials (including water)**

- 2.2.1 At no time shall the operator introduce any substance or preparation into the installation that is labelled with the Hazard Statement of H340, H350, H350i, H360D, H360F, H341 nor H351 without the prior written consent of the regulator. Substances or preparations already in use shall be Replaced or Controlled under contained conditions and Limited in accordance with a scheme to be submitted to the regulator within 3 months of the issue of this permit.
- 2.2.2 The operator shall review water use within the installation activities annually and report any changes in use of water to Worcester City Council.
- 2.2.3 All site combustion processes shall continue to use gas fuel only as the primary fuel, unless a change is approved by Worcester City Council
- 2.2.4 The operator shall:
- a** maintain an inventory covering the principal types of raw materials used;
  - b** annually review alternatives for the principal types of raw materials used with regard to their environmental impact;
  - c** have quality procedures to control the specification of raw materials used, in order to minimise any potential environmental impact.
- 2.2.5 The operator shall ensure that deliveries are carried out in such a way so as to minimise noise, spillage, leaks and dusty emissions.
- 2.2.6 Storage areas shall be under cover and protected from the elements to avoid or minimise environmental impact, except where stored materials are in suitable weather proof containers.
- 2.2.7 Storage areas shall be hard surfaced.

## 2.3 **Waste Minimisation**

- 2.3.1 The operator shall record materials usage and waste generation in order to establish internal benchmarks. Assessments should be made against internal benchmarks to maintain and improve resource efficiency.
- 2.3.2 Consumption of organic solvents shall be reduced and minimised where practicable through good process control and the application of the appropriate techniques for the system as described in Guidance Note GG429 Cost Effective Solvent Management, available from Envirowise.
- 2.3.3 The operator shall carry out a waste minimisation audit at least every four years. The methodology used and an action plan for optimising the use of raw materials shall be submitted to the regulator within 2 months of completion of the audit.
- 2.3.4 Specific improvements resulting from the recommendations of audits shall be carried out within a timescale agreed by Worcester City Council.



## 2.4 **Waste handling**

2.4.1 The operator shall:

- a** record the quantity, nature, origin and, where relevant, the destination, frequency of collection, mode of transport and treatment method of any waste which is disposed of or recovered;
- b** ensure that waste storage areas are clearly marked and signed, and that containers are clearly labelled;
- c** ensure that appropriate storage facilities are provided for substances that are flammable, sensitive to heat or light, etc., and that incompatible waste types are kept separate;
- d** ensure that containers are stored with lids, caps and valves secured and in place (this also applies to emptied containers);
- e** ensure that procedures are in place to deal with damaged or leaking containers;
- f** segregate waste wherever possible; and
- g** identify the disposal route for all waste, which should be as close to the point of production as possible.

2.4.2 All reasonably practicable efforts shall be made to minimise the amount of residual organic solvent-bearing material left in drums and other containers after use. All organic solvent shall be placed in a suitably labelled metal bin fitted with a self-closing lid.

2.4.3 Prior to removal from site, used wipes and other items contaminated with organic solvent shall be placed in a suitably labelled metal bin fitted with a self-closing lid.

2.4.4 Bins shall be emptied at least daily.

2.4.5 For materials that may undergo spontaneous combustion, special bins that allow air to circulate beneath and around them to aid cooling shall be used.

2.4.6 The operator shall carry out an annual review to demonstrate that the best environmental options are being used for dealing with all waste from the installation.

## 2.5 **Groundwater protection**

2.5.1 There shall be no emissions to groundwater from the permitted installation.

2.5.2 With regard to subsurface structure, the operator shall:

- a** maintain a record of the routing of all installation drains and subsurface pipework;
- b** identify any subsurface sumps and storage vessels;
- c** where any subsurface sumps and storage vessels exist, to engineer systems to minimise leakages from pipes and ensure swift detection if they do occur, particularly where hazardous (i.e. listed) substances are involved;
- d** where any subsurface sumps and storage vessels exist, provide, in particular, secondary containment and/or leakage detection for such subsurface pipework, sumps and storage vessels; and

- e** where any subsurface sumps and storage vessels exist, establish an inspection and maintenance programme for any subsurface structures, e.g. pressure tests, leak tests, material thickness checks or CCTV.

2.5.3 For surfacing, the operator shall:

- a** ensure that all operational areas are equipped with an impervious surface, spill containment kerbs, sealed construction joints, and connection to a sealed drainage system unless the operator justifies that this is not necessary to the satisfaction of Worcester City Council;
- b** keep records of the design and condition of the surfacing of all operational areas;
- c** have an inspection and maintenance programme of impervious surfaces and containment kerbs; and
- d** justify where operational areas have not been equipped with:
  - i** an impervious surface;
  - ii** spill containment kerbs;
  - iii** sealed construction joints; or
  - iv** connection to a sealed drainage system.

2.5.4 The operator shall ensure that any interceptors:

- a** are impermeable;
- b** are subject to visual inspection and any contamination removed at a frequency agreed with Worcester City Council; and
- c** have an annual maintenance inspection (prior to inspection all contents shall be removed).

2.5.5 Storage areas and containers shall be designed and operated to minimise the risk of fugitive releases to surface water, sewer and groundwater, in particular:

- a** storage areas shall be located away from watercourses and shall be protected against vandalism;
- b** the maximum storage capacity of storage areas shall be stated and not exceeded;
- c** the maximum storage period for containers shall be specified; and
- d** storage areas and silos shall be inspected at least once a week to check for signs of leakage or potential leakage.

2.5.6 Delivery connections to bulk storage tanks shall be located within a bunded / contained area, fixed and locked when not in use.

2.5.7 Procedures for dealing with the discharges from bunds shall be in place.

2.5.8 All fixed storage tanks shall be fitted with audible and / or visual high-level alarms or volume indicators to warn of overfilling. Where practicable, the filling systems shall be interlocked to the alarm system to prevent overfilling.

2.5.9 Deliveries to bulk storage tanks shall be supervised by appropriately trained personnel (including trained drivers) to avoid potential accidents and spillage.

2.5.10 Solvent-containing materials shall be stored in closed storage containers.

## 2.6 **Energy efficiency**

- 2.6.1 The operator shall produce a report annually on the energy consumption of the installation, and shall send a copy of that report to the Worcester City Council. The report shall contain, as a minimum, the information specified in the form listed in Schedule 5.
- 2.6.2 Fan motors shall be fitted with VSD controls to minimise energy usage wherever possible.
- 2.6.3 The operator shall monitor energy flows and target areas for reduction which shall be updated annually.
- 2.6.4 The operator shall ensure that all plant is operated and maintained to optimise the use and minimise the loss of energy.
- 2.6.5 The operator shall ensure that all appropriate containment methods (e.g. seals and self-closing doors) are employed and maintained to minimise energy loss.
- 2.6.6 Inverter drives on new fans shall be considered on extraction systems to abatement plant.
- 2.6.7 Heat recovery shall be maximised from the thermal oxidiser.

## 2.7 **Accident prevention and control**

- 2.7.1 There shall be written procedures for investigating incidents and near misses including identifying suitable corrective action and following up.
- 2.7.2 The operator shall maintain an accident management plan that identifies the hazards, assesses the risks and identifies the measures required to reduce the risk of potential events or failures that might lead to an environmental impact. The plan shall identify:
- a** the actions to be taken to minimise these potential occurrences; and
  - b** the actions to deal with such occurrences so as to limit their consequences.
- 2.7.3 In the case of abnormal emissions arising from an accident, the operator shall:
- a** investigate immediately and undertake remedial action as soon as practicable;
  - b** promptly record the events and actions taken; and
  - c** ensure the Worcester City Council is made aware without delay.
- 2.7.4 Suitable solvent containment and spillage equipment shall be readily available in all solvent handling areas.
- 2.7.5 Adequate provision to contain potential liquid and solid spillage shall be provided.
- 2.7.6 Appropriate precautions shall be taken to prevent ignition of flammable materials.
- 2.7.7 All spillages shall be cleared as soon as possible; solids by vacuum cleaning; wet methods or other appropriate techniques may be used, however, dry sweeping of dusty spillages shall not be permitted.
- 2.7.8 The handling and use of flammable and explosive materials shall be carried out in accordance with the requirements of the Dangerous Substances and Explosive Atmospheres Regulations 2002.

- 2.7.9 Areas where flammable organic solvents and organic solvent-containing materials are handled or used shall be suitably contained to minimise the potential spread of fire.
- 2.7.10 Operations working at above 25% of the organic solvent LEL shall be controlled using suitable monitoring and control devices.
- 2.7.11 The auto-ignition temperature shall not be exceeded in any organic solvent-containing section of the process, with the exception of the combustion chamber of any thermal abatement plant.
- 2.7.12 Electrical zoning and static protection shall be provided in all areas where flammable organic solvents are stored, used or handled.
- 2.7.13 Controlled shut-down procedures shall be in place for dealing with an emergency such as organic solvent levels entering the combustion plant at greater than the limit as calculated using the relevant standards (normally 25 %).
- 2.7.14 The storage, handling and use of flammable materials shall be undertaken so as to prevent accidents and limit their consequences.

## 2.8 **Noise and vibration**

- 2.8.1 The operator shall employ basic good practice measures for the control of noise, in particular:
- a** identification of key plant and equipment (or operations) with the potential to give rise to significant noise and take such measures as are necessary by way of mitigation and maintenance of existing plant and equipment in order to minimise noise.
  - b** documented maintenance systems for the identified key plant and equipment.

## 2.9 **Monitoring**

- 2.9.1 There shall be provided:
- a** safe and permanent means of access to enable sampling and monitoring to be carried out in relation to emission points specified in con; and
  - b** safe means of access to other sampling and monitoring points when required by Worcester City Council.
- 2.9.2 Channels to which abatement equipment is connected and which at the final point of discharge emit more than an average of 10 kg/h of total organic carbon, shall be monitored continuously for compliance.
- 2.9.3 In cases not falling within condition 2.9.2 above, either continuous or periodic measurements shall be carried out. For periodic measurements at least three readings shall be obtained during each measurement exercise.
- 2.9.4 Extractive monitoring to demonstrate compliance with the emission limit values in condition 6.1.6 shall be carried out at least once a year.
- 2.9.5 Where the emission limit value in condition 6.1.7 below applies, extractive monitoring to demonstrate compliance with that condition shall be carried out at least once a year.

- 2.9.6 Where H341 or H351 halogenated VOC are used, extractive monitoring to demonstrate compliance with condition 6.1.8 below shall be carried out at least once a year.
- 2.9.7 Extractive monitoring to demonstrate compliance with conditions 6.1.13 to 6.1.13 below shall be carried out at least once a year.
- 2.9.8 Where monitoring for carbon monoxide is used as a surrogate measurement for VOC destruction, the operator shall carry out continuous recorded indicative monitoring for carbon monoxide.
- 2.9.9 Where isocyanate is used, extractive monitoring to demonstrate compliance with condition 6.1.15 below shall be carried out at least once a year.
- 2.9.10 Where fluorine-containing coating is used, extractive monitoring to demonstrate compliance with condition 6.1.16 below shall be carried out at least once a year.
- 2.9.11 Where chlorine-containing coating is used, extractive monitoring to demonstrate compliance with condition 6.1.17 below shall be carried out at least once a year.
- 2.9.12 A programme to monitor and record the consumption of surface treatment against product produced shall be used to optimise the amount of organic ink / coatings / organic solvent used.
- 2.9.13 In order to optimise combustion, the operator shall, where practicable, monitor carbon monoxide and oxygen in waste gases.

## 2.10 **Decommissioning**

- 2.10.1 The operator shall, subject to the conditions of this permit, make provision for decommissioning the installation as described in the documentation specified in Table 2.10.1, or as otherwise agreed in writing by the Worcester City Council.

**Table 2.10.1 : Decommissioning**

Document	Part
Application	Section B2.11 / B3.1 / B3.1A / B2.3
Schedule 4 notice response	Section 5.11

## 2.11 **Environmental management system**

- 2.11.1 Operators should use an effective Environmental Management System with policies and procedures for environmental compliance and improvements. Audits should be carried out against those procedures at regular intervals.

### **Operations and maintenance**

- 2.11.2 Effective operational and maintenance systems shall be employed on all aspects of the installation whose failure could impact on the environment, in particular there shall be:
- a** documented operational control procedures;
  - b** a documented preventative maintenance schedule, covering all plant whose failure could lead to impact on the environment, including major 'non-productive' items such as tanks, pipework, retaining walls, bunds, ducts and filters (this shall be reviewed annually); and

**c** documented procedures for monitoring emissions.

2.11.3 A list of key process equipment and abatement equipment shall be maintained. Such equipment shall be provided with alarms or other warning systems which indicate equipment malfunction or breakdown. Such warning systems shall be maintained and checked to ensure continued correct operation, in accordance with the manufacturer's recommendations.

2.11.4 Essential spares and consumables shall be held on site, or be available at short notice from suppliers, so that plant breakdown can be rectified rapidly.

#### **Competence and Training**

2.11.5 A competent person shall be appointed to liaise with Worcester City Council and the public with regard to complaints. Worcester City Council shall be informed of the designated individual.

2.11.6 Training systems, covering the following items, shall be in place for all relevant staff:

- a** awareness of the regulatory implications of the permit;
- b** awareness of all potential environmental impacts under normal and abnormal circumstances;
- c** awareness of the procedures for dealing with a breach of any permit conditions;
- d** prevention of accidental emissions and action to be taken when accidental emissions occur; and
- e** awareness of all operating procedures.

2.11.7 The skills and competencies necessary for key posts (which may include contractors and those purchasing equipment and materials) shall be documented and records of training needs and training received for those posts maintained.

2.11.8 The potential environmental risks posed by the work of contractors shall be assessed and instructions provided to contractors about protecting the environment while working on site.

## 3 Records

- 3.1.1 A record shall be made of:
- a** any malfunction, breakdown or failure of plant, equipment or techniques (including down time and any short term and long term remedial measures) that may have, has had or might have had an effect on the environmental performance of the permitted installation. These records shall be kept in a log maintained for that purpose;
  - b** all monitoring and sampling taken or carried out in accordance with the conditions of this permit and any assessment or evaluation made on the basis of such data.
- 3.1.2 There shall be made available for inspection by Worcester City Council at any reasonable time:
- a** specified records;
  - b** any other records made by the operator in relation to the operation of the permitted installation ("other records")
- 3.1.3 A copy of any specified or other record shall be supplied to Worcester City Council on demand and without charge.
- 3.1.4 Specified records and other records shall:-
- a** be legible;
  - b** be made as soon as reasonably practicable;
  - c** indicate any amendments which have been made, and include the original record wherever possible.
- 3.1.5 Specified records and other records shall be retained for a minimum period of 4 years from the date when the records were made.
- 3.1.6 For all waste received at or produced from the permitted installation, the operator shall record (and shall retain such records for a minimum of 4 years):
- a** its composition, or as appropriate, description;
  - b** the best estimate of the quantity produced;
  - c** its disposal routes; and
  - d** the best estimate of the quantity sent for recovery.
- 3.1.7 A record shall be made at the permitted installation of any complaints concerning the installation's effect or alleged effect on the environment. The record shall give the date of complaint, time of complaint, a summary of any investigation and the results of such investigation. Such records shall be made in a log kept for this purpose.
- 3.1.8 Records of breakdowns shall be kept and analysed by the operator in order to eliminate common failure modes.
- 3.1.9 All audit records of raw materials usage, water usage, energy usage and waste production shall be referenced to annual production.

## 4 Reporting

- 4.1.1 All reports and notifications required by this permit, or by regulation 10 of the PPC Regulations, shall be sent to Worcestershire Regulatory Services, Finepoint Way, Kidderminster, DY11 7WF.
- 4.1.2 The operator shall provide the Worcester City Council with the reports listed in Table S2 to Schedule 2 as follows:
- a** in respect of the emission points specified;
  - b** for the reporting periods specified in Table S2 to Schedule 2 and using the forms in Schedule 5 specified in Table S2;
  - c** giving the information from such results and assessments as may be required by the forms specified in those tables; and
  - d** sending the report to the Worcester City Council within 28 days of the end of the reporting period.
- 4.1.3 The operator shall submit to the Worcester City Council a report on potential environmental improvements to the permitted installation. The report shall assess the costs and benefits of additional or alternative techniques that may provide environmental improvements. Where potential improvements are identified the report shall provide a plan for implementation, or justification if potential improvements are not planned to be implemented. The report shall be reviewed and re-issued every 36 months after issue of this permit.
- 4.1.4 The operator shall, by 1 April in each year, provide the Worcester City Council with a summary report of the previous year's progress against its annual improvement targets contained within its environmental management system.
- 4.1.5 Fugitive emissions shall be reviewed on an annual basis. A summary report on this review shall be sent to the Worcester City Council, not later than 1 April in each year detailing such releases and the measures taken to reduce them.
- 4.1.6 The operator shall demonstrate compliance with the following to the satisfaction of the Worcester City Council:
- emission limit values in waste gases and fugitive emission values;
- Gas volumes may be added to the waste gas for cooling or dilution purposes where technically justified but shall not be considered when determining the mass concentration of the pollutant in the waste gas.
- 4.1.7 You must respond to any Information Notice served on you for the purposes of complying with your obligation to report your pollutant releases and off-site waste transfers pursuant to the directly applicable EU duty in accordance with Article 5 of EC Regulation No 166/2006 concerning the establishment of a European Pollutant Release and Transfer Register. As a permit condition, your failure to respond in accordance with such annual E-PRTR Information Notice will hereby constitute a breach of your permit.



## 5 Notifications

- 5.1.1 The operator shall notify the Worcester City Council **without delay** of:
- a** the detection of an emission of any substance which exceeds any limit in this permit specified in relation to the substance;
  - b** the detection of any fugitive emission which has caused or may cause pollution unless the quantity emitted is so trivial that it would be incapable of causing pollution;
  - c** the detection of any malfunction, breakdown or failure of plant or techniques which has caused or may have the potential to cause pollution; and
  - d** any accident which has caused or may have the potential to cause pollution.
- 5.1.2 The operator shall submit written confirmation to Worcester City Council of any notification under condition 5.1.1 above by sending:
- a** the information listed in Part A of Schedule 1 to this permit within 24 hours of such notification; and
  - b** the more detailed information listed in Part B of that schedule as soon as practicable thereafter;
- and such information shall be in accordance with that schedule.
- 5.1.3 The operator shall give written notification to the Worcester City Council, as soon as practicable, of any of the following:
- a** permanent cessation of the operation of any part of or all of the permitted installation;
  - b** cessation of the operation of any part of or all of the permitted installation for a period, likely to exceed 1 year; and
  - c** resumption of the operation of any part of or all of the permitted installation after a cessation notified under condition 5.1.3b above.
- 5.1.4 The operator shall notify the following matters to the Worcester City Council, in writing, within 14 days of their occurrence:
- i** any change in the operator's trading name, registered name or registered office address;
  - ii** a change to any particulars of the operator's ultimate holding company (including details of an ultimate holding company where the operator has become a subsidiary); and
  - iii** any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
- 5.1.5 Where the operator has entered into a Climate Change Levy Agreement, the operator shall notify the Worcester City Council, in writing within 14 days, in the event that the Secretary of State has not re-certified that agreement.

## 6 Emissions

### 6.1 Emissions into air

6.1.1 Emissions to air from the emission points specified in Table 6.1.1 shall only arise from the source specified in that table and from the oxidiser location shown on the site plan.

**Table 6.1.1: Emission points into air**

Emission point reference	Source	Emission type
A1	Thermal oxidiser exhaust	Combustion products and VOCs

6.1.2 The operator shall ensure that hot emissions take place from the minimum practicable number of stacks. If practicable a multi-flue stack shall be used.

6.1.3 Subject to condition 6.1.5 below, the operator shall ensure that the minimum vent height is 3 m above roof ridge height of any building within a distance of 5 times the uncorrected vent height and in no circumstances shall it be less than 8 m above ground level.

6.1.4 The operator shall ensure that vent and chimney heights are sufficient to ensure adequate dispersion under all normal operating conditions

6.1.5 Condition 6.1.3 above shall not apply to workplace dust extraction units.

6.1.6 The operator shall not exceed:

- i the VOC emission limit value of 100mg expressed as Carbon/Nm<sup>3</sup> for waste gases from oxidation plant used for abatement
- ii the fugitive emission value of 20 % of solvent input.

6.1.7 For discharges of VOCs which are assigned the Hazard Statements H340, H350, H350i, H360D, or H360F where the mass flow of the sum of the compounds causing the labelling is greater than, or equal to 10 g/h, an emission limit value of 2 mg/Nm<sup>3</sup> shall not be exceeded from any contained source. The emission limit value refers to the mass sum of the individual compounds.

6.1.8 For discharges of halogenated VOCs which are assigned the Hazard Statement H341 or H351, where the mass flow of the sum of the compounds causing the labelling H341 or H351 is greater than, or equal to, 100 g/h, an emission limit value of 20 mg/Nm<sup>3</sup> shall not be exceeded from any contained source. The emission limit value refers to the mass sum of the individual compounds.

6.1.9 In the case of periodic measurements the emission limit values shall be considered to be complied with if, in one monitoring exercise:

- (a) the average of all the readings does not exceed the emission limit values, and
- (b) none of the hourly averages exceeds the emission limit value by more than a factor of 1.5.

- 6.1.10 Compliance with the provisions of conditions 6.1.7 and 6.1.8 above shall be verified on the basis of the sum of the mass concentrations of the individual volatile organic compounds concerned. For all other cases, compliance shall be verified on the basis of the total mass of organic carbon emitted.
- 6.1.11 The operator shall ensure that emissions from combustion processes in normal operation are free from visible smoke and in any case do not exceed the equivalent of Ringelmann Shade 1 as described in British Standard BS 2742:1969.
- 6.1.12 Where there are any persistent visible emissions, the operator shall investigate the cause and nature of the emissions and provide a report to the Worcester City Council.
- 6.1.13 Emissions to air of carbon monoxide from abatement plant shall not exceed 100 mg/m<sup>3</sup>.
- 6.1.14 Emissions to air of oxides of nitrogen from abatement plant shall not exceed 100 mg/m<sup>3</sup>.
- 6.1.15 Where isocyanate is used, emissions to air of isocyanate from any contained source shall not exceed 0.1 mg/m<sup>3</sup> (averaged over a 2-hour period, as total NCO group).
- 6.1.16 Where fluorine-containing coating is used, emissions to air of fluoride from any contained source shall not exceed 5 mg/m<sup>3</sup> (expressed as hydrogen fluoride).
- 6.1.17 Where chlorine-containing coating is used, emissions to air of hydrogen chloride from any contained source shall not exceed 10 mg/m<sup>3</sup>.
- 6.1.18 The operator shall ensure that emissions of water vapour are free from droplet fallout.
- 6.1.19 Operations shall be controlled to minimise fugitive emissions.
- 6.1.20 For VOC where the operator uses the emission and fugitive limits for compliance, the fugitive VOC emissions shall be determined in accordance with the Solvent Management Plan.
- 6.1.21 Vent systems shall be chosen to minimise breathing emissions (e.g. pressure / vacuum valves) and, where relevant, shall be fitted with knock-out pots and appropriate abatement equipment.

## 6.2 **Emissions to land**

- 6.2.1 There shall be no emission to land from the permitted installation.
- 6.2.2 The operator shall notify the Worcester City Council, as soon as practicable, of any information concerning the state of the site which affects or updates that provided to the Worcester City Council as part of the site report submitted with the application for this permit.

## 6.3 **Emissions to water (other than emissions to sewer)**

- 6.3.1 There shall be no releases to water from the permitted installation.

## 7 Improvement programme

- 7.1.1 Installation of enclosed solvent delivery system to printing presses by 31<sup>st</sup> March 2018.

## 8 Written agreement to changes

8.1.1 Where the qualification “or as otherwise agreed in writing” is used in a condition of this permit, the operator shall seek such agreement in the following manner:

- a** the operator shall give Worcester City Council written notice of the details of the proposed change, indicating the relevant part(s) of this permit; and
- b** such notice shall include an assessment of the possible effects of the proposed change (including waste production) on risks to the environment from the permitted installation.

8.1.2 Any change proposed according to condition 8.1.1 above and agreed in writing by Worcester City Council, shall not be implemented until the operator has given Worcester City Council prior written notice of the implementation date for the change. As from that date, the operator shall operate the permitted installation in accordance with that change, and any relevant documentation referred to in this permit shall be deemed to be amended.

# Schedule 1

## Confirmation of condition 5.1.1 notifications, in accordance with condition 5.1.2 above

This Schedule outlines the information that the operator must provide to the Worcester City Council to satisfy condition 5.1.2 above. Units of measurement used in information supplied under Part A and B requirements must be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the PPC regulations.

### Returns should contain

#### Part A

- Name of operator
- Location of installation
- Date information provided
- Time, date and location of the emission
- Prevailing weather conditions and wind direction
- Identity and details of the substance(s) emitted to include:-
  - Best estimate of the quantity or the rate of emission, and the time during which the emission took place
  - Environmental medium into which the emission took place
  - Measures taken, or intended to be taken, to stop the emission

#### Part B

- Any more accurate information on the matters notified under Part A
- Measures taken, or intended to be taken, to prevent a recurrence of the incident
- Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment or harm which has been or may be caused by the emission
- The dates of any Part A notifications within the previous 24 months

- Name  Post
- Signature  Date
- Statement that signatory is authorised to sign on behalf of RPC Bpi Protec Worcester.

## Schedule 2

### Reporting

The reports to be made in accordance with condition 4.1.2 above are listed below. Unless otherwise agreed in writing between Worcester City Council and the operator, the forms in Schedule 5 specified in Table S2 are to be used.

**Table S2: Reporting**

Report	Emission point	Frequency	Form
Total VOC and carbon monoxide	A1	Annually	A1
Waste	-	Annually	X1
Energy (condition 2.6.1)	-	Annually	E1
Water use review (condition 2.2.2)	-	Annually	-
Waste options review (condition 2.4.6)	-	Annually	-
EMS target review (condition 4.1.4)	-	Annually	-
Fugitive emission review (condition 4.1.5)	-	Annually	-
Environmental improvements (condition 4.1.3)	-	3 - yearly	-
Waste minimisation audit (condition 2.3.3)	-	4- yearly	-

## Schedule 5

### EMISSIONS TO AIR

Release summary for 12 months ending .....

RPC Bpi Protec Worcester, Blackpole Trading Est., Worcester, WR3 8ZL

<b>Form A1</b>			
<b>Parameter</b>	<b>Emission point</b>	<b>Release limit</b>	<b>Reported release</b>
VOC	A1	100 mg m <sup>-3</sup>	
Carbon monoxide	A1	100 mg m <sup>-3</sup>	
Oxides of Nitrogen	A1	100 mg m <sup>-3</sup>	

All reported values are to be expressed at 273 K, 101.3 kPa, without correction for water vapour content.

**Signed of behalf of the operator** .....

**Dated** .....



**WASTE**

Summary for the 12 months ending .....

RPC Bpi Protec Worcester, Blackpole Trading Est., Worcester, WR3 8ZL

Form X1		
Waste	Quantity removed from installation for recycling (tonnes)	Quantity removed from installation for disposal (tonnes)
Polythene		
Solvent		
Solvent sludge (ex recovery plant )		
Plastic		
Wipes / rags		
Oils / parts cleaner		
General waste		

**Signed of behalf of the operator** .....

**Dated** .....

**ENERGY CONSUMPTION**

Summary for the 12 months ending .....

RPC Bpi Protec Worcester, Blackpole Trading Est., Worcester, WR3 8ZL

**Form E1**

<b>Energy source</b>	<b>Annual energy consumption (MWh)</b>	<b>Carbon dioxide emissions (tonnes)</b>
Electricity		
Natural gas		
Diesel		

**Signed of behalf of the operator** .....

**Dated** .....

Appendix 1

