

Permit with introductory note

Environmental Permitting Regulations 2007

Amcor Flexibles Europe

Orleans Close

Four Pools Industrial Estate

Evesham

Worcestershire

WR11 2XL

Permit Number:

WYC/IPPC/1/2/03

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Introductory note

This introductory note does not form a part of the Permit

The following Permit is issued under Regulation 13 of the Environmental Permitting Regulations 2007 (S.I.2007 No.3538) ("the EP Regulations") to operate an installation carrying out activities covered by the description in Section 6.4 A2(a) in Part 1 to Schedule 1 of those Regulations, to the extent authorised by the Permit.

Section 6.4 A2(a) Printing and coating in plant with a consumption capacity of organic solvents of more than 150kg per hour or more than 200 tonnes per year

It should be noted that aspects of the operation of the installation which are not regulated by conditions are subject to the condition implied by Regulation 12(10) of the PPC Regulations, that the Operator shall use the best available techniques for preventing or, where that is not practicable, reducing emissions from the installation.

Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Brief description of the installation regulated by this permit

The application and drying of printing ink to paper, plastic film and laminates as part of a flexible packaging manufacturing operation and subsequent finishing operations involving the maximum use of 2000 tonnes of organic solvent per annum involving the following operations –

The storage of organic solvents in three tanks with storage capacity of 34,000 litres, 22,000 litres and 32,000 litres.

The storage of organic solvents, flexographic inks, varnishes and lacquers in containers with a capacity of less than 205 litres in barrel room.

The mixing of inks and rectification of returned inks in the dispensing room.

Flexographic printing on the following presses

- a) Press WH101 a Windmoeller and Holscher 10 colour press with an integral indirect gas fired curing oven with a net rated thermal input of 500 kw/hr,. located as Press 1 on the attached figure 3
- b) Press WH81 a Windmoeller and Holscher 8 colour press with an integral indirect gas fired curing oven with a net rated thermal input of 400 kw/hr located as Press 2 on the attached figure 3
- c) Press WH82 a Windmoeller and Holscher 8 colour press with an integral indirect gas fired curing oven with a net rated thermal input of 400 kw/hr, located as Press 3 on the attached figure 3
- d) Press WH84 a Windmoeller and Holscher 8 colour press with an integral indirect gas fired curing oven with a net rated thermal input of 400 kw/hr, located as Press 4 on the attached figure 3

The cutting of printed materials using either one of

- Slitter E6 Atlas slitter, located as on the attached figure 3.
- Slitter E8 Proslip Icon slitter, located as on the attached figure 3.
- Slitter E11 Atlas slitter, located as on the attached figure 3.
- Slitter E4 Titan SR6 slitter, located as on the attached figure 3.
- Slitter E9 Atlas slitter, located as on the attached figure 3.

The lamination of foil to printed materials on 4 lamination machines Laminator 1, 2, 3 and 4 Nordmeccanica solventless lamination machines, located as on the attached figure 3.

The washing of the inking components from the flexographic presses in an enclosed washer in the wash room, as on the attached figure 3.

Volatile organic solvent emissions from the parts washer and the four flexographic presses are passed to a three canister regenerative thermal oxidiser device, located as on the attached figure 3.

There are no direct emissions of contaminated water to local water courses. All contaminated water is directed through the sewage system.

There are no direct emissions to land.

Holder	Reference Number	Date of Original Issue
Amcor Flexibles Europe	WYC/24/5/93	9 th October 2001
Amcor Flexibles Europe	WYC/IPPC/1/103	8 th December 2004

Public Registers

Considerable information relating to Permits including the application is available on public registers in accordance with the requirements of the PPC Regulations. Certain information may be withheld from the public registers where it is commercially confidential or contrary to national security.

Confidentiality

The Permit requires the operator to provide information to Wychavon District Council. This information will be placed on the public registers in accordance with the requirements of the Environmental Permitting Regulations. If the operator considers that any information provided is commercially confidential, it may apply to the Council to have such information withheld from the register as provided in the Environmental Permitting Regulations 2007. To enable the Council to determine whether the information is commercially confidential, the operator 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, by the Council serving a Variation Notice on the Operator. If the operator itself wants any of the conditions of the permit changed it must submit a formal application. The status log within the Introductory Note to any such variation will include summary details of this permit, variations issued up to that point in time and state whether a consolidated version of the permit has been issued.

Surrender of the permit

Before this permit can be wholly or partially surrendered, an application to surrender the permit must be made. For the application to be successful, the operator must be able to demonstrate to the Council, that in accordance with regulation 24 Environmental Permitting Regulations 2007, that no additional pollution of the site has occurred since the issue of the permit, 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 Environmental Permitting Regulations 2007. A transfer will be allowed unless the 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. If the permit authorises the carrying out of a specified waste management activity, then there is a further requirement that the transferee is considered to be a "fit and proper person" to carry out that activity.

Appeals against the Permit conditions

Operators of LA-IPPC may appeal to the Secretary of State under regulation 31 against certain decisions made by the local authority. Schedule 6 of the EP Regulations sets out the detailed procedures.

It is to be hoped, however that by paying close attention to the relevant sector guidance note(s) and by good communication at all stages between local authorities and operators, the number of time-consuming and potentially costly appeals can be kept to a minimum. Further information on appeals can be found within the 'General Guidance Manual on Policy and Procedures for A2 and B installations' which is available to download from www.defra.gov.uk

Anyone who is aggrieved by the Conditions attached to this Permit can appeal to the Secretary of State for the Department for Environment, Food and Rural Affairs no later than 6 months from the date of the Permit.

Any such appeal should be addressed to

The Planning Inspectorate,
Environmental Team, Major & Specialist Casework,
Room 4/04 Kite Wing,
Temple Quay House
2 The Square
Temple Quay,
Bristol
BS1 6PN.

Telephone 0117 372 8726
Fax 0117 372 8139

The Planning Inspectorate have also produced guidance which can be found at <http://www.planning-inspectorate.gov.uk/pins/environment/environmen/index.htm>

The appeal procedure is contained in Schedule 6 of the Environmental Permitting (England and Wales) Regulations 2007.

The appeal must be in the form of a written notice or letter stating that the person wishes to appeal and listing the Condition(s) which is/are being appealed against. The following items must be included:

- a) a statement of the grounds of appeal;
- b) a copy of any relevant application;
- c) a copy of any relevant authorisation;
- d) a copy of any relevant correspondence between the person making the appeal ('the appellant') and the LRA;
- e) a copy of any decision on notice which is the subject matter of the appeal; and
- f) a statement indicating whether the appellant wishes the appeal to be dealt with

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- by a hearing attended by both parties and conducted by an inspector appointed by the Secretary of State; or
- by both parties sending the Secretary of State written statements of their case (and having the opportunity to comment on one another's statements).

At the same time, the notice of appeal and documents (a) and (e) must be sent to Wychavon District Council, and the person making the appeal should inform the Secretary of State for the Department for Environment, Food and Rural Affairs that this has been done.

Please Note:

An appeal will **not** suspend the effect of the Conditions appealed against; the Conditions must still be complied with.

In determining an appeal against one or more Conditions, the Regulations allow the Secretary of State in addition to quash any of the other Conditions not subject to the appeal and to direct the Council either to vary any of these other Conditions or to add new Conditions.

Contacting to Wychavon District Council

If you contact the Wychavon District Council about this Permit please quote the Permit Reference Number.

The contact telephone numbers are

Wychavon District Council

Main Switchboard: (01386) 56000 Fax 01386 561826

Environment Protection Section: (01386) 565274

E-mail keith.handy@wychavon.gov.uk

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Status Log

<u>Detail</u>	<u>Date</u>	<u>Comment</u>
Application received	Received 30 June 03	Duly Made 8.July 03
Response to request for information	Request dated:	Response dated:
Request to extend determination	Request dated: 13 Oct 03	Request accepted: 17 Feb 04
Permit	Determined: 8 Dec 2004	
Application for variation	Received: 16 Nov 2009	
Variation Ref. No. 1	Determined: 20 Jan 2010	
Application for Transfer	Received:	
Transfer Ref. No	Determined:	
Variation Application	Determined:	
Variation Application	Determined:	

Permit

Pollution Prevention and Control Regulations 2000

Environmental Permitting Regulations 2007

Permit number

WYC/IPPC/1/2/03

Wychavon District Council in exercise of its powers under Regulation 12 of the Environmental Permitting Regulations 2007 (S.I. 2007 No.3538), hereby authorises

Amcor Flexibles UK Ltd ("the Operator"),

Whose Registered Office is Amcor Central Services Hawkfield Way Bristol BS14 0BD

Holding company's registration number: 2808801

To operate an installation at Amcor Flexibles Evesham, Orleans Close, Four Pools Industrial Estate, Evesham, Worcestershire, WR11 2XL

To the extent authorised by and subject to the conditions of this Permit.

Signed

Dated

Keith Handy Environmental Health Officer

Authorised to sign on behalf of the Wychavon District Council

Conditions

1. General

1.1 The operator is authorised to carry out the activities and associated activities specified in Table 1.

Activity under Schedule 1 of the Regulations/ Associated Activity	Description of specified activity	Limits of specified activity
Section 6.4 Coating Activities, Printing and Textile Treatments (Part A(2))	Surface treating substances, objects or products using organic solvents, in particular for dressing, printing, coating, degreasing, waterproofing, sizing, painting, cleaning or impregnating, in plant with a consumption capacity of more than 150 kg per hour or more than 200 tonnes per year	
Storage of Organic Solvents	The storage of organic solvents in 3 tanks of 34.000 litres capacity, 22,000 litres and 32,000 litres capacity	Located in the storage area referenced 01.
Storage of organic solvents, flexographic inks, varnishes and lacquers	In containers of less than 205 litres capacity.	Located in the barrel room
The mixing of inks and rectification of returned inks	Inks are mixed to produce required colours and rectified	Located in the dispensing room
Flexographic Printing	<p>Press 1 WH101 a Windmoeller and Holscher 10 colour press with an integral indirect gas fired curing oven with a net rated thermal input of 500 kw/hr,. located as on the attached figure 3</p> <p>Press 2 WH81 a Windmoeller and Holscher 8 colour press with an integral indirect gas fired curing oven with a net rated thermal input of 400 kw/hr located as on the attached figure 3</p> <p>Press 3 WH82 a Windmoeller and Holscher 8 colour press with an integral indirect gas fired curing oven with a net rated thermal input of 400 kw/hr, located as on the attached figure 3</p> <p>Press 4 WH84 a Windmoeller and Holscher 8 colour press with an integral indirect gas fired curing oven with a net rated thermal input of 400 kw/hr, located as on the attached figure 3</p>	Located as referenced press 1, 2, 3 and 4 on figure 3
The cutting of printed materials.	<p>Slitter E6 Atlas slitter, located as on the attached figure 3.</p> <p>Slitter E8 Proslip Icon slitter, located as on the attached figure 3.</p> <p>Slitter E11 Atlas slitter, located as on the attached figure 3.</p> <p>Slitter E4 Titan SR6 slitter, located as on the attached figure 3.</p> <p>Slitter E9 Atlas slitter, located as on the attached figure 3.</p>	<p>Located as reference slitter 1</p> <p>Located as reference slitter 2</p> <p>Located as reference slitter 3</p> <p>Located as reference slitter 4</p> <p>Located as reference slitter 5</p>
Lamination of foil to printed material	Using one of four Nordmeccanica solventless lamination machines	Located as reference laminator 1 to 4 on figure 3
The washing of equipment from the presses.	In an enclosed washer	Located as reference washroom
The incineration of extracted organic solvents.	Using a three canister regenerative thermal oxidiser	Located as reference RTO

1.2 The activities authorised under condition 1.1 above shall not extend beyond the site, being the land edged red on the plan referenced figure 1 schedule 4 to this permit.

- 1.3 Subject to the operating conditions of this permit, the operator shall maintain the Environmental Management System that been accredited under certificate no. LRQ 4001155 sufficient to achieve compliance with the limits and conditions of this permit.
- 1.4 The operator shall complete the improvements specified in Table 15 by the dates specified in that table and send written notification of the date of completion of each requirement.
- 1.5 The permitted installation shall, subject to the conditions of this permit, be operated using the techniques and in the manner in the application document or as otherwise approved in writing by the Council.
- 1.6 There are no off-site conditions.

1.4	Alex Phillips	Tony Webley	H&S office

2 Emission Limits

2.1 Emissions Limits into air

- 2.1.1 This Part of this permit shall not apply to releases of odour, noise or vibration. Emissions to air from the emission points specified in Table 2 shall only arise from the sources specified in that Table.

Emission point reference/	Source	Emission Description
Point A1 on figure 3	Regenerative Thermal Oxidiser stack	VOC's, NO _x and CO
Point A2 on figure 3	Main RTO bypass vent	VOC's
Point A3 on figure 3	RTO bypass vent press 1	VOC's
Point A4 on figure 3	RTO bypass vent press 2	VOC's
Point A5 on figure 3	RTO bypass vent press 4	VOC's
Point A6 on figure 3	RTO bypass vent press 3	VOC's
Point A7 on figure 3	RTO bypass vent wash room (redundant)	nil
Point A8 on figure 3	Extraction vent for Laminators 1, 2, 3 and 4	Isocyanates
Point A9 on figure 3	Exhaust from treater unit on laminator 1	ozone
Point A10 on figure 3	Exhaust from treater unit on laminator 2	ozone
Point A11 on figure 3	Exhaust from treater unit on laminator 3	ozone
Point A12 on figure 3	Exhaust from treater unit on press 3	ozone
Point A13 on figure 3	Exhaust from treater unit on press 2	ozone
Point A14 on figure 3	Exhaust from treater unit on press 1	ozone
Point A15 on figure 3	Ink stores (barrel room)	VOC's
Point A16 on figure 3	Ink stores (dispense room)	VOC'S

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Points A17 – A22 on figure 3	Factory gas heating flue	NO _x and CO
Point A23 on figure 3	Wash room gas heating flue	NO _x and CO
Points A24 – A26 on figure 3	Process Heating	NO _x and CO
Points A27 – A43 on figure 3	High Level roof extraction	VOC's and Ozone

2.1.2 The limits for emissions into air for the parameters and emission points set out in Table 3 shall not be exceeded.

Parameters	Limit and Frequency	Emission Point
Carbon Monoxide mg/m ³	100 mg/m ³	A1
Frequency of monitoring	Annually	
Volatile Organic Compounds (as carbon) mg m ³	50 mg/m ³	A1
Frequency of monitoring	Annually	-
Volatile Organic Compounds	20% of annual organic solvent consumption as fugitive emissions	Whole of the installation
Isocyanates mg/m ³	0.10 mg/m ³	A8
Frequency of monitoring	Annually	-
Oxides of nitrogen (as NO _x) mg m ⁻³	100 mg/m ³	A1
Frequency of monitoring	Annually	

2.1.3 The Operator shall carry out monitoring of the parameters listed in Table 3, from the emission points and at the frequencies specified.

2.2 Emissions Limits to land

2.2.1 There shall be no emissions to land from the Permitted installation.

2.2.2 The Operator shall notify the Council, as soon as practicable, of any information concerning the state of the Site which affects or updates that provided to the Council as part of the Site Report submitted with the application for this Permit.

2.3 Emissions to water (other than emissions to sewer)

2.3.1 There shall be no emission to water from the permitted installation

2.4 Emissions to sewer

2.4.1 There shall be no emissions to the foul or storm water sewer of any substance described in List 1 and List II Groundwater Regulations 1998(S.I.1998 No.2746)).

2.5 Emissions to groundwater

2.5.1 No emission from the permitted installation shall give rise to the introduction into groundwater of any substance in List I and List II, so as to cause pollution as defined in the Groundwater Regulations 1998 (S.I.1998 No.2746)).

2.5.2 There shall be no direct emission to groundwater from the permitted installation.

2.6 Fugitive emissions of substances to air

2.6.1 The operator shall use BAT so as to prevent or where that is not practicable to reduce fugitive emissions of substances to air from the permitted installation in particular from:

- storage areas
- buildings
- pipes, valves and other transfer systems
- open surfaces

provide always that the techniques used by the operator shall be no less effective than those described in the application, where relevant.

2.7 Fugitive emissions of substances to water and sewer

2.7.1 The operator shall use BAT so as to prevent or where that is not practicable to reduce fugitive emissions of substances to air from the permitted installation in particular from:

- all structures under or over ground
- surfacing
- bunding
- storage areas

2.8 Odour

2.8.1 The operator shall use BAT so as to prevent or where not practicable to reduce odorous emissions from the permitted installation, in particular by:

- limiting the use of odorous materials
- restricting odorous activities
- controlling the storage conditions of odorous materials
- controlling processing parameters to minimise the generation of odour
- optimising the performance of abatement systems
- timely monitoring, inspection and maintenance
- provide always that the techniques used by the operator shall be no less effective than those described in the application, where relevant.

2.9 Emissions to Land

2.9.1 No emission from the permitted installation shall be made to land.

2.1.3	Operations Manager	H&S manager-- Cirrus	H&S manager
2.1.3	Operations Manager	Engineering manager – Operational	Engineering Manager
2.2.2	General Manager	Dept Manager responsible for contamination control and report it to GM and H&S.	Dept Manager
2.6.1	Operations Manager	Engineering Manager	Engineering Manager
2.7.1	Operations Manager	Engineering Manager	Engineering Manager
2.8.1	Operations Manager	Engineering Manager	Engineering Manager

3 Techniques for Pollution Control

3.1 Delivery, storage and handling of input (raw) materials

3.1.1 The Operator shall, subject to the conditions of this Permit, use raw materials (including water) as described in the documentation specified in Table 4, or as otherwise agreed in writing by the Council.

Table 4 Raw materials (including water)		
Description	Parts	Date Received
Variation Application	The response to question B 2.4 of the variation application.	16 October 2009

3.1.2 An inventory shall be maintained of all principle types of raw materials used. The inventory shall be reviewed on an annual basis with regard to their environmental impact and any long-term studies undertaken into less polluting options shall be identified within the review period.

3.1.3 The company shall follow the quality procedures identified in the Environmental Management Plan accredited under certificate LRQ 4002613 to ISO 14001 to control the specification of raw materials used with regard to minimising any environmental impact.

3.1.4 A programme of monitoring shall be undertaken to record the consumption of inks, coatings, organic solvent against products produced to optimise the amount of organic solvent/ink used.

3.1.5 The operator shall ensure that all deliveries of raw materials are carried out in such a way so as to minimise noise, spillage, leaks and dusty emissions.

3.1.6 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.

3.1.7 Storage areas shall be hard surfaced.

3.1.8 The bulk storage tanks for solvents and solvent-containing liquids shall be back vented to the delivery tank during filling. Where this is impracticable, for example: due to long pipe runs,

back pressure, or contractual agreements over deliveries, then, displaced air vents should be sited in such a way as to prevent the arising of offensive odour beyond the site boundary.

- 3.1.9 The bulk storage tanks for solvents shall be light coloured, in order to reduce thermal increase as a resulting from sunlight.
- 3.1.10 New static bulk solvent storage tanks containing solvent with a composite vapour pressure that is likely to exceed 0.4kPa at 20°C (293K) shall be fitted with pressure vacuum relief valves. Pressure vacuum relief valves shall be examined at a minimum of at least once every six months for signs of contamination, incorrect seating and should be cleaned and corrected as required.
- 3.1.11 Delivery connections to the solvent storage tanks shall be located in containment trough and be locked when not in use.
- 3.1.12 The solvent storage tanks shall be fitted with audible and visual high-level alarms or volume indicators to warn of overfilling. The filling systems shall be interlocked to the alarm system to prevent overfilling.
- 3.1.13 Solvent deliveries to the bulk storage tanks shall be supervised by appropriately trained personnel from Amcor Flexibles and the trained delivery driver, to avoid potential accidents and spillage.
- 3.1.14 Solvent containing materials shall be stored in closed storage containers.
- 3.1.15 The storage, handling and use of flammable materials shall be undertaken so as to prevent accidents and limit their consequences.
- 3.1.16 Cleaning operations shall be reviewed annually to identify cleaning steps that can be eliminated. Application of cleaning organic solvents shall be from a contained device or automatic system when applied directly on to machine rollers and dispensed by piston type dispenser or similar contained device, when used on wipes
- 3.1.17 Pre-impregnated organic solvent wipes shall be held within an enclosed container prior to use.
- 3.1.18 Off-line cleaning shall be carried out in the enclosed wash machine located in the wash-up area. The wash machine shall be sealed to prevent emissions whilst in operation and the solvent laden air extracted to Regenerative Thermal Oxidiser abatement plant.
- 3.1.19 Residual ink and coating contained in parts of the press shall be removed prior to cleaning.
- 3.1.20 Returned ink from presses shall be kept and reused or distilled to remove the organic solvent content which may then be used in cleaning operations
- 3.1.21 Organic solvent free adhesive shall be used on the lamination machines.

3.2 Coatings Preparation

- 3.2.1 Mixing and blending vessels shall be carried out in the ink stores.
- 3.2.2 The operator shall have quality procedures to control the specification of raw materials used, in order to minimise any potential environmental impact.

3.3 Emissions Control

All releases to air

3.3.1 Vents and chimneys

- 3.3.2 The operator shall ensure that all operations that generate emissions to air are contained and adequately extracted to suitable abatement plant, where this is necessary to meet specified emission limits.
- 3.3.3 The output of the quantitative monitors shall be continuously recorded. All monitoring instruments shall be fitted with audible and visual alarms, which shall activate at a reference level agreed with this authority. Emission events that lead to the alarms being activated shall be recorded in the logbook.
- 3.3.4 The chimney reference A1 serving the Regenerative Thermal Oxidiser shall discharge at least 11metres above ground level.
- 3.3.5 The bypass discharge stacks reference A2, A3, A4, A5, A6 and A7 on figure 3 shall discharge at least 3 metres above the roof ridge height of any building within 15 metres of any of the above bypass stacks.
- 3.3.6 All emissions into the air from
- a) the chimney stacks serving the regenerative thermal oxidiser, the four flexographic presses, laminators 1, 2, 3 and 4 referenced A1, A2, A3, A4, A5, A6 and A8 on figure 3,
 - b) all building openings
- shall be colourless and free from persistent mist, (other than steam or water vapour), free from droplets and free from persistent fume.
- 3.3.7 Dilution air shall not be admitted into the waste gases or process gases for the purpose of achieving an emission limit.
- 3.3.8 Emissions from combustion processes in normal operation shall be 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.
- 3.3.9 All emissions from the four printing presses and from the washing machine shall pass through a regenerative thermal oxidiser prior to being exhausted to atmosphere through chimney stack A1.
- 3.3.10 The operator shall ensure that all reasonably practicable steps are taken during start-up and shut down, and changes in combustion load in order to minimise emissions
- 3.3.11 The operator shall investigate the cause and nature of any persistent visible emissions and provide a report to the Council.
- 3.3.12 Ensure that flues and ductwork are cleaned as part of the routine maintenance programme to prevent accumulation of materials.
- 3.3.13 Ensure that exhaust gases discharged through a stack achieve an exit velocity greater than 15m/sec during normal operating conditions to achieve adequate dispersion.
- 3.3.14 Ensure that stacks are not fitted with any restriction at the final opening such as a plate, cap or cowl, with the exception of a cone that may be necessary to increase the exit velocity of the emissions.

3.4 Emissions to surface water and sewers

- 3.4.1 The operator shall ensure that
- All emissions are controlled, as a minimum, to avoid a breach of water quality standards.

- Run-off from the installation should be controlled and managed and where necessary treated before discharge in a suitable effluent treatment plant,
- All interceptors are impermeable, subject to visual inspection, the removal of any contamination at a frequency agreed with the regulator and have an annual maintenance inspection; prior to inspection all contents should be removed.
- Procedures for dealing with the discharges from bunds shall be in place.

3.5 Fugitive emissions to air

3.5.1 The fugitive VOC emissions shall be determined in accordance with the Solvent Management Plan.

3.5.2 When transferring volatile liquids, the following techniques shall be employed –

- subsurface filling via filling pipes extended to the bottom of the container, the use of vapour balance lines that transfer the vapour from the container being filled to the one being emptied,

or

- an enclosed system with extraction to suitable abatement plant where abatement is necessary to meet the emission limits.

3.5.3 Pre impregnated organic solvent wipes shall be held within a closed container prior to use.

3.5.4 Used organic solvent wipes and other items contaminated with organic solvent shall be placed in a suitably labelled metal bin fitted with a self-closing lid.

3.5.5 The application of cleaning organic solvents shall be from a contained device or automatic system when applied directly.

3.5.6 Closed cleaning systems shall be used wherever possible.

3.5.7 Ductwork should be gastight to prevent fugitive loss of Volatile Organic Compounds (VOC's).

3.5.8 Drying systems shall operate to maximise the drying efficiency. Complete drying reduces the fugitive emission level of organic solvents left in products.

3.5.9 The integrity of storage tanks shall be inspected, recorded and documented. These inspections shall be included in the maintenance schedule.

- The operator shall maintain a record of the routing of all installation drains and subsurface pipework.
- identify all subsurface sumps and storage vessels
- engineer systems to minimise leakages from pipes and ensure swift detection if they do occur, particularly where hazardous (i.e. listed) substances are involved
- provide, in particular, secondary containment and/or leakage detection for such subsurface pipework, sumps and storage vessels
- establish an inspection and maintenance programme for all subsurface structures, e.g. pressure tests, leak tests, material thickness checks or CCTV

3.5.10 The operator shall ensure that all operational areas have 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 the Council.

- keep records of the design and condition of the surfacing of all operational areas – relevant information may include, as appropriate, capacities, thicknesses, falls, material, permeability, strength/reinforcement, and resistance to chemical attack.
- have an inspection and maintenance programme of impervious surfaces and containment kerbs.
- justify where operational areas have not been equipped with an impervious surface, spill containment kerbs, sealed construction joint, connection to a sealed drainage system.

3.5.11 The operator shall ensure that all tanks containing liquids whose spillage could be harmful to the environment are contained.

3.5.12 The operator shall ensure that all bunds:

- be impermeable and resistant to the stored materials
- have no outlet (that is, no drains or taps) and drain to a blind collection point
- have pipework routed within bunded areas with no penetration of contained surfaces
- are designed to catch leaks from tanks or fittings
- should be at least 110% of the largest tank
- are visually inspected weekly and any contents pumped out or otherwise removed under manual control after checking for contamination
- where not frequently inspected, are fitted with a high-level probe and an alarm as appropriate have an annual maintenance inspection (normally visual but extending to water testing where structural integrity is in doubt)

3.5.13 All sumps shall:

- be impermeable and resistant to stored materials
- be subject to regular visual inspection agreed with the Council and any contents pumped out or otherwise removed after checking for contamination

3.6 Odour

3.6.1 All storage tanks shall:

- be fitted with high-level alarms or volume indicators to warn of overfilling. The filling system shall be interlocked to the alarm system of prevent overfilling.
- have delivery connections located within a bunded area, fixed and locked when not in use
- have their integrity inspected, recorded and documented. These inspections shall be included in the maintenance schedule.

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

- storage areas shall be located away from watercourses and should be protected against vandalism
- the maximum storage capacity of storage areas shall be stated and not exceeded

- the maximum storage period for containers shall be specified
- storage areas and silos shall be inspected at least once a week to check for signs of leakage or potential leakage

3.7 Operations and maintenance

3.7.1 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:

- documented operational control procedures
- 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 should be reviewed and updated annually.
- documented procedures for monitoring emissions.

The systems shall be reviewed and updated annually

3.7.2 The Council shall be provided with a list of key process equipment and abatement equipment. Such equipment shall be provided with alarms or other warning systems that 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.

3.7.3 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.

3.7.4 Records of breakdowns shall be kept and analysed by the operator in order to eliminate common failure modes.

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

3.7.6 A high standard of housekeeping shall be maintained.

3.1.1	Operations Manager	Engineering manager	Engineering Manager
3.1.2	Operations Manager	Engineering manager and H+S Manager	H+S Manager
3.1.3	Operations Manager	Engineering manager and H+S Manager	H+S Manager
3.1.4	Operations Manager	Engineering manager and H+S Manager	H+S Manager Sun chemical manager
3.1.5	Operations Manager	Engineering manager and H+S Manager	H+S Manager Sun chemical manager
3.1.6	Operations Manager	Engineering manager and H+S Manager	H+S Manager Sun chemical manager
3.1.7	Operations Manager	H+S Manager Sun chemical manager Engineering manager	H+S Manager Sun chemical manager
3.1.8	Operations Manager	H+S Manager Sun chemical manager Engineering manager	H+S Manager Sun chemical manager
3.1.9	Operations Manager	H+S Manager Sun chemical manager Engineering manager	H+S Manager Sun chemical manager
3.1.10	Engineering manager and Operations Manager	Engineering manager and H+S Manager	Engineering manager and H+S Manager

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3.1.11 and 3.1.12	H+S Manager Sun chemical manager Engineering manager	H+S Manager Sun chemical manager Engineering manager	H+S Manager Sun chemical manager
3.1.13	H+S Manager Sun chemical manager	H+S Manager Sun chemical manager	H+S Manager Sun chemical manager
3.1.14 to 3.1.17	Print manager and sun chemical manager	Print manager and sun chemical manager and Augean	H+S Manager Sun chemical manager
3.1.18	Print manager/ Operation manager	Engineering manager and H+S Manager	Engineering manager and H+S Manager
3.1.19 to 3.1.21	Print manager and sun chemical manager	Print manager and sun chemical manager	H+S Manager Sun chemical manager
3.2 to 3.2.2	Print manager and sun chemical manager	Print manager and sun chemical manager	Print manager and sun chemical manager
3.3	General manager	Engineering manager	Engineering manager
3.3.2 to 3.3.14	General manager	Engineering manager	Engineering manager
3.4 to 3.5	Operations Manager	Engineering manager	Engineering manager
3.5.1	General manager/ Operations manager	H+S Manager Sun chemical manager	H+S Manager Sun chemical manager
3.5.2 to 3.5.4	Operations Manager	H+S Manager Sun chemical manager Augean	H+S Manager Sun chemical manager
3.5.5 and 3.5.6	Operations Manager	H+S Manager Sun chemical manager Augean	H+S Manager Sun chemical manager
3.5.7 to 3.5.9	Operations Manager	Engineering manager	Engineering manager
3.5.10	General manager/ Operations manager	Engineering manager	H+S Manager Sun chemical manager
3.5.11	Operations manager	Print manager and finishing manager and sun chemical manager	H+S Manager Sun chemical manager
3.5.12 and 3.5.13	General manager/ H+S Manager Sun chemical manager	H+S Manager Sun chemical manager Engineering manager	H+S Manager Sun chemical manager
3.6.1 and 3.6.2	General manager/ H+S Manager Sun chemical manager	H+S Manager Sun chemical manager Engineering manager	Engineering manager
3.7.1 to 3.7.6	General manager, Engineering manager	Engineering manager	Engineering manager

4 Management

- 4.1 The Permitted Installation shall, subject to the conditions of this Permit, be operated using the techniques and in the manner described in the documentation specified in Table 5, or as otherwise agreed in writing by the Council.

Description	Parts	Date Received
Variation Application	The responses to question B 2.1 of the variation application.	16 October 2009

4.2 Management techniques and control

- 4.2.1 The Permitted Installation shall, subject to the conditions of this Permit, be managed and controlled as described in the documentation specified in Table 6, or as otherwise agreed in writing by the Council.

Description	Parts	Date Received
Variation Application	The response to question 2.12 of the variation application	16 October 2009

4.3 Audit

- 4.3.1 All audit records of raw materials usage, water usage, energy usage and waste production shall be referenced to annual production.

4.4 Competence and training

- 4.4.1 Training systems, covering the following items, shall be in place for all relevant staff:
- awareness of the regulatory implications of the permit
 - awareness of all potential environmental impacts under normal and abnormal circumstances
 - awareness of the procedures for dealing with a breach of the permit conditions
 - prevention of accidental emissions and action to be taken when accidental emissions occur
 - awareness of all operating procedures
- 4.4.2 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 these posts maintained.
- 4.4.3 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.

4.5 Raw Materials

- 4.5.1 The operator shall:
- maintain an inventory covering the principal types of raw materials used.
 - annually review alternatives for the principal types of raw materials used with regard to their environmental impact.
 - have quality procedures to control the specification of raw materials used, in order to minimise any potential environmental impact.

- complete any long term studies needed into the less polluting options and make any material substitutions identified within the review period.

4.5.2 The operator shall ensure that substances or preparations which, because of their content of VOC are assigned risk phrases R45, R46, R49, R60 or R61 are replaced, as far as possible by less harmful substances and preparations within the shortest possible time.

4.6 Waste Minimisation

4.6.1 The operator shall carry out a waste minimisation audit at least as frequently as the review period of the permit. The methodology using process mapping, raw materials mass balance and an action plan for optimising the use of raw materials shall be submitted to the Council within 2 months of completion of the audit.

4.6.2 Where an audit has not been carried out in the 2 years prior to submission of the application then the first audit shall take place within 18 months of the issue of the permit.

4.6.3 Specific improvements resulting from the recommendations of audits shall be carried out within a timescale approved by the Council.

4.7 Water Use

4.7.1 The operator shall carry out a water efficiency audit. Where one has not been carried out recently, an initial comprehensive audit should be carried out at the earliest opportunity, but at the latest within 2 years. Audits should be at least as frequent as the permit reviews.

4.7.2 Using this information, opportunities for reduction in water use shall be assessed and, where appropriate, shall be carried out in accordance with a timescale approved by the regulator.

4.7.3 The volume of mains and abstracted water used in the activities shall be directly measured normally once a day, or at a frequency agreed with the regulator, when the installation is operating all measurements shall be recorded and the records held on site.

4.8 Operating Techniques

4.8.1 The Permitted Installation shall, subject to the conditions of this Permit, be operated using the techniques and in the manner described in the documentation specified in Table 7, or as otherwise agreed in writing by the Council.

Table 7 Operating Techniques		
Description	Parts	Date Received
Variation Application	The responses to question B 2.1 of the variation application.	16 October 2009

4.9 Waste Management

4.9.1 The Operator shall, subject to the conditions of this Permit, handle and store waste as described in the documentation specified in Table 8, or as otherwise agreed in writing by the LA.

Table 8 Waste handling and storage		
Description	Parts	Date Received
Variation Application	The response to question B 2.5 in the variation application.	16 October 2009

4.9.2 Waste materials specified in Table 9 shall only be stored on the site in the location and manner specified in that Table.

Description of Waste	Location of Storage on Site	Manner of Storage	Storage Conditions
Solvent waste in 30,000 ltr tank in solvent farm	Bunded area O1	Storage tank	Removed to suppliers for distilling then re-used on site
Waste Inks	Bunded area O2	Waste ink tank	Removed by contractors for use in cement manufacture
25l steel ink pails	Storage area O3	Designated area	Reused or recycled for scrap metal
Waste adhesives	Storage by warehouse contractor	200 IBC's	Collected by supplier
Waste Adhesives	Storage O7	Double skinned container	Removed by approved waste disposal contractor
Cleaning Clothes	Storage area O4	In sealed containers	Laundered by contractor and reused
Sheet materials, doctor and knife blades	Storage area O6	Hazardous waste skip	Recycled as scrap metal
Miscellaneous printed film, edge trim, production bin waste	Storage areas O8 and O9	General waste skip	Goes to landfill
Miscellaneous wood, cardboard cores		General waste skip	Goes to landfill
Miscellaneous printed film		Special trailer	Recycled overseas
Pallets end plates			Reconditioned
Waste Oil		205l barrels in engineering workshop	Recycled

4.9.3 The operator shall:

- 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
- ensure that waste storage areas are clearly marked and signed, and that containers are clearly labelled
- 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
- ensure that containers are stored with lids, caps and valves secured and in place (this also applies to emptied containers)
- ensure that procedures are in place to deal with damaged or leaking containers.
- segregate waste wherever practicable
- identify the disposal route for all waste, which should be as close to the point of production as possible

4.9.4 The amount of residual organic solvent bearing material left in drums and other containers after use shall be minimised. All organic solvent contaminated waste shall be stored within closed containers.

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

- 4.9.6 The bins shall be emptied at least daily, as the contents not only present a fire hazard, but they may also undergo spontaneous combustion.
- 4.9.7 Dusty wastes shall be stored in closed containers and handled in a manner that avoids emissions.
- 4.9.8 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.
- 4.9.9 Records shall be maintained of any waste sent off site, and these records shall be made available to the Council at all times.

4.10 Waste recovery and disposal

Description	Parts	Date Received
Variation application	The response to question B 2.5 of the variation application.	16 October 2009

4.11 Energy Efficiency

4.11.1 The Operator shall, subject to the conditions of this Permit, use energy as described in the documentation specified in Table 11, or as otherwise agreed in writing by the LA.

Description	Parts	Date Received
Variation Application	The response to question B 2.7 of the variation application.	16 October 2009

- 4.11.2 The operator shall produce a report annually on the energy consumption of the installation.
- 4.11.3 The operator shall monitor energy flows and target areas for reduction it shall be updated annually.
- 4.11.4 In order to optimise combustion, the operator shall, where monitor carbon monoxide and oxygen in waste gases.
- 4.11.5 The operator shall ensure that all plant is operated and maintained to optimise the use and minimise the loss of energy.
- 4.11.6 The operator shall ensure that all appropriate containment methods, (e.g. seals and self-closing doors) are employed and maintained to minimise energy loss.

4.12 Energy efficiency techniques

4.12.2 The following techniques shall be considered:

- heat recovery from different parts of the processes
- minimisation of water use and closed circulating water systems
- good insulation
- plant layout to reduce pumping distances
- phase optimisation of electronic control motors

- optimised efficiency measures for combustion plant e.g. air/feed-water preheating, excess air etc.

4.13 Energy supply technique

4.11.1 The following techniques shall be considered:

- use of Combined Heat and Power (CHP)
- generation of energy from waste
- use of less polluting fuels

4.14 Accident prevention and control

4.14.1 The Operator shall, subject to the conditions of this Permit, prevent and limit the consequences of accidents as described in the documentation specified in Table 12, or as otherwise agreed in writing by the Council.

Description	Parts	Date Received
Variation Application	The response to question B 2.8 of the variation application.	16 October 2009

4.15 Accidents/incidents/non conformance

4.15.1 There shall be written procedures for investigating incidents and near misses, including identifying suitable corrective action and following up.

4.15.2 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:

- the actions to be taken to minimise these potential occurrences;

and

- the actions to deal with such occurrences so as to limit their consequences

4.15.3 In the case of abnormal emissions arising from an accident, such as a spillage for example, the operator shall:

- investigate immediately and undertake remedial action as soon as practicable
- promptly record the events and actions taken
- ensure the regulator is made aware, as soon as practicable

4.15.4 Suitable solvent containment and spillage equipment shall be readily available in all solvent handling areas.

4.15.5 Adequate provision to contain potential liquid and solid spillage shall be provided.

4.15.6 Appropriate precautions shall be taken to prevent ignition of flammable materials.

4.15.7 All spillages shall be cleared as soon as possible; dry sweeping of dusty spillages shall not be permitted.

- 4.15.8 The handling and use of flammable and explosive materials shall be carried out in accordance with the requirements of the Dangerous Substances and Explosive Atmosphere Regulations SI2776 2002.
- 4.15.9 Areas where flammable organic solvents and organic solvent containing materials are handled or used shall be suitably contained to minimise the potential spread for fire.
- 4.15.10 Operations working at above 25% of the organic solvent LEL must be controlled using suitable monitoring and control devices.
- 4.15.11 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 the Regenerative Thermal Oxidiser abatement plant.
- 4.15.12 Electrical zoning and static protection shall be provided in all areas where flammable organic solvents are stored used or handled
- 4.15.13 Controlled shutdown procedures shall be in place for dealing with emergency such as organic solvent levels entering the combustion plant at greater than 25% LEL.
- 4.15.14 The storage, handling and use of flammable materials shall be undertaken so as to prevent accidents and limit their consequences.

4.16 Noise and vibration

- 4.16.1 The operator shall employ basic good practice measures for the control of noise, in particular:
 - identification of key plant and equipment with the potential to give rise to noise nuisance
 - documented maintenance systems for the identified key plant and equipment
- 4.16.2 A Noise Management Plan shall be drawn up by the Operator and agreed with the Council. The plan shall be reviewed annually and updated as necessary.
- 4.16.3 The noise levels from all chimneys and ventilation openings shall be monitored and where necessary provided with effective noise control measures.
- 4.16.4 Activities, that generate noise shall not be carried out on the yard between 20.00 and 08.00 hours.

4.17 Monitoring and Reporting

- 4.17.1 The Operator shall, subject to the conditions of this Permit, carry out, evaluate and assess monitoring as described in the documentation specified in Table 13, or as otherwise agreed in writing by the Council.

Monitoring		
Description	Parts	Date Received
Variation application	The response to question B 2.10 of the variation application.	16 October 2009

- 4.17.2 All information required to be reported in accordance with Article 5 of the Regulation (EC) No 166/2006 for European Pollutant Release and Transfer Register shall be submitted to the Council on the electronic E-PRTR Data Submission Sheet by the 1st April each year for the period 1st January to 31 December of the previous year.
- 4.17.3 The operator shall monitor emissions, make tests and inspections of the process and keep records, in particular the operator shall keep records of audits, inspections, tests and

monitoring, including all non-continuous monitoring, inspections and visual assessments. Monitoring may include process variables and operating conditions where relevant to emissions.

- 4.17.4 The current records shall be kept on site and be made available for inspection by an authorised inspector of the Council. The records shall be kept by the operator for at least two years
- 4.17.5 The operator shall notify the Council at least 7 days before any periodic monitoring exercise to determine compliance with emission limit values. The operator shall state the provisional time and date of monitoring, pollutants to be tested and the methods to be used
- 4.17.6 The results of non-continuous emission testing shall be forwarded to the regulator within 8 weeks of the completion of the sampling. The results shall include process conditions at the time of monitoring.
- 4.17.7 Adverse results from both continuous and non-continuous monitoring shall be investigated immediately.
- 4.17.8 The operator shall ensure that:
- the cause of adverse results has been identified and corrective action taken
 - as much detail as possible is recorded regarding the cause and extent of the problem and the action taken to rectify the situation
 - re-testing to demonstrate compliance is carried out as soon as possible,
- and
- the Council is notified
- 4.17.9 In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions:
- investigation and remedial action shall be undertaken immediately
 - the process or activity shall be adjusted to minimise those emissions;
- and
- the events and actions taken shall be promptly recorded
 - in the case of non-compliance causing immediate danger to human health, operation of the activity shall be suspended
- 4.17.10 The Council shall be informed without delay:
- if there is an emission that is likely to have an effect on the local community
 - in the event of the failure of key abatement plant
 - if continuous monitoring shows an emission concentration exceeding double the limit value
- 4.17.11 The design and location of sampling systems shall be designed and located in order to obtain representative samples for all release points.

- sampling points on new plant shall be designed to comply with the British or equivalent standards. E.g. BS ISO 9096: 2003, BS EN 13284-1 or BS ISO 12141:2002 for sampling particulate matter in stacks
- the operator shall ensure that adequate facilities for sampling are provided on stacks or ducts
- where monitoring is not in accordance with the main procedural requirements of the relevant standard, deviations shall be reported as well as an estimation of any error invoked

4.17.12 Continuous monitoring is normally expected for the main abated releases identified in Section 2. Where continuous monitoring is required by the permit it shall be carried out as follows:

- all continuous monitoring readings shall be on display to appropriately trained operating staff
- instruments shall be fitted with audible and visual alarms, situated appropriately to warn the operator of arrestment plant failure or malfunction
- the activation of alarms shall be automatically recorded
- all continuous monitors shall be operated, maintained and calibrated (or referenced) in accordance with the manufacturers' instructions, which should be made available for inspection by the regulator. The relevant maintenance and calibration (or referencing) should be recorded
- all new continuous monitoring equipment shall be designed for less than 5% downtime over any 3-month period

4.18 Monitoring and reporting of emissions to air

4.18.1 Exhaust flow rates of waste gases shall be consistent with the efficient capture of emissions, good operating practice and meeting the requirements of the legislation relating to the workplace environment.

4.18.2 The introduction of dilution air to achieve emission concentration limits shall not be permitted.

4.18.3 Periodic visual assessment of releases shall be undertaken as required by the regulator to ensure that all final releases are colourless, free from persistent visible emissions and free from droplets.

4.18.4 Calibration and compliance monitoring should meet the following provisions as appropriate. No result shall exceed the emission concentration limits specified, except where either:

- (a) data is obtained over at least 5 sampling hours in increments of 15 minutes or less; or
- (b) at least 20 results are obtained where sampling time increments of more than 15 minute are involved; and in the case of (a) or (b)
- (c) no daily mean of all 15-minute mean emission concentrations should exceed the specified emission concentration limits during normal operation (excluding start-up and shut-down);

and

- (d) no 15-minute mean emission concentration should exceed twice the specified emission concentration limits during normal operation (excluding start-up and shut-down).

4.18.5 Where continuous quantitative monitoring is undertaken, compliance with © and (d) above shall be demonstrated on a daily basis.

4.18.6 The Regenerative Thermal oxidiser shall have continuous monitoring and recording of temperature.

4.19 Monitoring and reporting emissions to water and sewer

4.19.1 Copies of any monitoring reports required by Severn Trent Water shall be sent to the Council.

4.20 Monitoring and reporting of waste

4.20.1 The following shall be monitored and recorded:

- the physical and chemical composition of the waste
- its hazard characteristics
- handling precautions
- and
- substances with which it cannot be mixed

4.21 Monitoring of VOC

4.21.1 The Solvent Management Plan shall be used to determine the annual solvent consumption.

4.21.2 The Solvent Management Plan shall be used for determining the fugitive emissions. Once completed, it need not be repeated until the equipment is modified.

4.21.3 The Solvent Management Plan shall be used to determine the actual emissions annually.

4.21.4 The frequency of manual sampling for VOC from abated releases must be at least annually.

4.21.5 There shall be provided:

- Safe and adequate means of access to enable sampling/monitoring to be carried out in relation to the emission points specified in Schedule 2, unless otherwise specified in that Schedule

And

- Safe and adequate means of access to other sampling/monitoring points when required by the Council.

4.21.6 Daily visual and olfactory assessments of releases shall be undertaken to ensure that all final releases to air shall be essentially colourless, free from persistent trailing mist or fume and free from droplets. Records of these assessments shall be kept in the log book

4.1	Operations manager/ H+S manager	H+S manager/ Engineering manager	H+S manager/ Engineering manager
4.2	Operations manager/ H+S manager	H+S manager/ Engineering manager	H+S manager/ Engineering manager
4.2.1	Operations manager/ H+S manager	H+S manager/ Engineering manager	H+S manager/ Engineering manager
4.3.1 to 4.4.3	Operations manager/ H+S manager	H+S manager	H+S manager
4.5.2 to 4.7.3	Operations manager/ H+S manager	H+S manager	H+S manager

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4.9.1	General manager/ H+S manager	H+S manager	H+S manager
4.9.2	General manager/ H+S manager	H+S manager	H+S manager
4.9.3	General manager/ H+S manager	H+S manager	H+S manager
4.9.4 to 4.9.9	Operations manager/ H+S manager/ Sun Chemical manager	H+S manager/ Sun Chemical manager	H+S manager/ Sun Chemical manager
4.10	Operations manager/ H+S manager/ Sun Chemical manager	H+S manager/ Sun Chemical manager and waste company	H+S manager/ Sun Chemical manager and waste company
4.11 to 4.11.6	Operations manager/ H+S manager	H+S manager/ Engineering manager	H+S manager/ Engineering manager
4.15 to 4.15.4	General manager/ H+S manager	H+S manager	H+S manager
4.15.5 to 4.15.14	Operations manager/ H+S manager/ Sun Chemical manager	Print and finishing manager/ Sun Chemical manager	H+S manager/ Sun Chemical manager
4.16.1 to 4.16.4	Operations manager/ H+S manager	H+S manager	H+S manager
4.17.1 to 4.17.12	General manager/ H+S manager	H+S manager/ Engineering manager	H+S manager/ Engineering manager
4.18.1 to 4.18.6	General manager/ H+S manager	H+S manager/ Engineering manager	H+S manager/ Engineering manager
4.19.1 and 4.20.1	General manager/ H+S manager	H+S manager/ Engineering manager	H+S manager/ Engineering manager
4.21.1 to 4.21.6	General manager/ H+S manager	H+S manager/ Engineering manager	H+S manager/ Engineering manager

5 Decommissioning

5.1 The Operator shall, subject to the conditions of this Permit, make provision for decommissioning the installation as described in the documentation specified in Table14, or as otherwise agreed in writing by the Council.

Description	Parts	Date Received
Variation application	The response to question B 2.11a of the variation application.	16 October 2009

5.2 The site closure plan, setting out the steps to be taken on cessation of installation activities shall be reviewed and updated annually.

Clause	Area Owner	Task Owner	Records Owner
5.1 and 5.2	General manager/ engineering manager	Engineering manager	Engineering manager

6 Records

6.1 All records or other documents required by this permit and any other records made by the Operator in relation to the operation of the Permitted Installation shall:-

- be made available for inspection by the Council at any reasonable time
- be supplied to the Council on demand and without charge
- be legible
- be made as soon as reasonably practicable
- indicate any amendments which have been made and shall include the original record wherever possible; and
- be retained for a minimum period of 4 years from the date when the records were

6.2 A record shall be made of:-

- 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 a significant effect on the environmental performance of the Permitted Installation. These records shall be kept in a log maintained for that purpose;
- all monitoring and sampling taken or carried out and any assessment or evaluation made on the basis of such data;
- 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.

Clause	Area Owner	Task Owner	Records Owner
6.1	General manager/ Engineering manager	Engineering manager	Engineering manager
6.2	General manager/ Engineering manager	Engineering manager	Engineering manager

7 Reporting

7.1 All reports shall be sent to the Council at the address notified in writing to the Operator.

7.2 The results obtained under conditions 4.17, 4.18, 4.19, 4.20 and 4.21 and any assessments made of such data shall be reported to the Council

7.3 Reports mentioned under condition 7.2 shall:

- be made in respect of the parameters and emission points specified in Table 16 in Schedule 2.
- be made for the reporting periods specified in Table 16 to Schedule 2 and using the forms specified in Table 17 to Schedule 3;
- give the information from such results and assessments as may be required by the forms specified in those Tables; and
- be sent to the Local Regulatory Authority within 28 days of the end of the reporting period.

7.4 The Operator shall report the parameters listed in Table 16 in Schedule 2 (“Reporting of Monitoring Data”) as follows:

- in respects of the emission points specified;
- for the reporting periods specified in Table 16 in Schedule 2 and using the forms specified in Table S3 to Schedule 3 (“ Reporting Forms”);
- giving the information from such results and assessments as may be required by the forms specified in those Tables; and
- Sending the report to the LA within 28 days of the end of the reporting period.

7.5 By not later than 31 January in each year, the Operator, shall:

- Complete a Pollution Reporting Form in respect of the Permitted Installation during the previous year. A record shall be kept of the calculations, estimations and assumptions made in determining the annual emissions reported on the Pollution Reporting Form. This record shall be retained for a period not less than 4 years.

7.6 Not later than 31 January in each year, the Operator shall provide a summary report of the previous year’s progress against the annual improvement targets in their Environmental Management System.

7.2	General manager	H+S manager/ Engineering	H+S manager/ Engineering
7.3	General manager/ Operasions manager	H+S manager/ Engineering	H+S manager/ Engineering
7.4	General manager/ Operasions manager	H+S manager/ Engineering	H+S manager/ Engineering
7.5 and 7.6	General manager/ Operasions manager	H+S manager/ Engineering	H+S manager/ Engineering

8 Notifications

8.1 The Operator shall notify the Council without delay of: -

- the detection of an emission of any substance which exceeds any limit or criteria in this permit specified in relation to the substance;
- the detection of any fugitive emission that has caused or may cause significant pollution unless the quantity emitted is so trivial that it would be incapable of causing pollution.
- the detection of any malfunction, breakdown or failure of plant or techniques which has caused or may have the potential to cause significant pollution; and
- any accident which has caused or may have the potential to cause significant pollution.

8.2 The Operator shall submit written confirmation to the Council of any notification under condition 8 in accordance with Schedule 1 to this Permit, by sending the information listed in Part A of Schedule 1 to this Permit within 24 hours of such notification. The Operator shall send the more detailed information listed in Part B of that Schedule as soon as practicable thereafter;

8.3 The Operator shall give written notification as soon as practicable, of any of the following

- permanent cessation of the operation of any part of or all of the Permitted Installation;
- cessation of the operation of any part of or all of the Permitted Installation for a period, likely to exceed 1 year; and
- Resumption of the operation of any part of or all of the Permitted Installation after a cessation notified under 8.3.

8.4 The Operator shall notify the following matters to the Council, in writing, within 14 days of their occurrence:

- any change in the Operator's trading name, registered name or registered office address;
- 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);
- any steps taken with a view to the Operator going into administration, entering into a company voluntary arrangement or being wound up.
- Where the Operator has entered into a Climate Change Agreement with the Government, the Operator shall notify the Council within one month of:
 - a decision by the Secretary of State not to re-certify that Agreement
 - a decision by either the Operator or the Secretary of State to terminate that agreement
 - any subsequent decision by the Secretary of State to re-certify such an Agreement

8.1	General manager	H+S manager/ Engineering	H+S manager/ Engineering
8.2	General manager/ Operations manager	H+S manager/ Engineering	H+S manager/ Engineering
8.3	General manager/ Operations manager	H+S manager/ Engineering	H+S manager/ Engineering

8.4	General manager/ Operations manager	H+S manager/ Engineering	H+S manager/ Engineering

Interpretation

In this Permit, the following expressions shall have the following meanings:

“Authorised Officer” means any person authorised by the Council under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, powers specified in Section 108(4) of that Act.

“Background concentration” means the same as “background quantity” as defined in paragraph 11 to Part 2 to Schedule1 of the PPC Regulations.

“Fugitive emission” means an emission from any point other than those specified in the Tables in Part 6 of this Permit.

“LAeq” means the A-weighted equivalent continuous equal energy level (dBA)

“Monitoring” includes the taking and analysis of samples, instrumental measurements (periodic and continual), calibrations, examinations, tests and surveys.

“Permitted Installation” means the activities and the limits to those activities described in Table 1.1.1 of this Permit.

“PPC Regulations” means the Pollution Prevention and Control Regulations 2000 (S.I. 2000 No. 1973) and words and expressions defined in the PPC Regulations shall have the same meanings when used in this Permit.

“Staff” includes employees, directors or other officers of the Operator, and any other person under the Operator’s direct or indirect control, including contractors.

“substances prescribed for water” means those substances mentioned in paragraph 13 of Part 2 of Schedule 1 to the PPC Regulations.

“year” means year ending 31 March.

Where a minimum limit is set for any emission parameter, references to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this Permit to concentrations of substances in emissions into air means;

in relation to gases from combustion processes, the pressure of 101.3 kPa and an oxygen content of 18% with no correction for water vapour for liquid and gaseous fuels, 6% dry for solid fuels; and/or

in relation to gases from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa and 18% oxygen, with no correction for water vapour content.

Written agreement to changes

Written agreement to changes

When 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: the Operator shall give the Council written notice of the details of the proposed change, indicating the relevant part(s) of this Permit; and 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.

Any change proposed according to condition 10.1.1 and agreed in writing by the Council, shall not be implemented until the Operator has given the Local Regulatory Authority 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 8.1 notifications, in accordance with condition 8.2

This Schedule outlines the information that the Operator must provide to the Local Regulatory Authority to satisfy condition 8.2 of this Permit.

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 Pollution Prevention and Control Regulations.

Returns should contain

Part A

- Name of Operator.
- Permit Number
- Location of Installation.
- Date information provided.
- Time, date and location of the emission.
- 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 in the previous 24 months.
- Name Post.....
- Signature Date
- Statement that signatory is authorised to sign on behalf of *[OPERATOR NAME]*

Schedule 2

Reporting of monitoring data

Parameters for which reports shall be made, in accordance with conditions 7.1 of this Permit, are listed below.

Table 16

Parameter	Emission	Reporting	Period begins
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Environmental Permitting Regulation 2007

	point	period
Carbon Monoxide mg/m ³	A1	annually
Volatile organic compounds mg/m ³	A1	annually
Isocyanates mg/m ³	A8	annually
Oxides of Nitrogen (as NO _x) mg m ³	A1	annually

Schedule 3

Forms to be used

Unless otherwise agreed in writing between Local Regulatory Authority and the Operator, the following Local Regulatory Authority forms are to be used for reports submitted to Local Regulatory Authority.

RELEASES INTO AIR

Release Summary for 12 months to --/--/--

Operator:

Permit No:

SUBSTANCE	LIMIT	A1	A8
Carbon Monoxide mg/m ³	100		-
VOC mg/m ³	100		-
Isocyanates mg/m ³	0.10	-	
Oxides of Nitrogen (as NO _x) mg/m ³	100		-

Signed on behalf of the OperatorDated

Schedule 4

Plans of Installation

Figure 1 Site Location and Boundary

Figure 2 Site Layout Plan

Figure 3 Point source emission to air points

Figure 4 Site Drainage

Clause	Area Owner	Task Owner	Records Owner
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Environmental Permitting Regulation 2007
