Telford & Wrekin COUNCIL

Telford and Wrekin
Application for an environmental permit part A2
Environmental Permitting (England and Wales) Regulations, 2010

For help contact
onlineapplications.licensing@telford.gov.uk
Telephone: 01952 381818

* required information

Section 1 of 15

You can save the form at any time and resume it later. You do not need to be logged in when you resume.

System reference	Not Currently In Use	This is the unique reference for this application generated by the system.
Your reference	WZP_A2_App_April2019	You can put what you want here to help you track applications if you make lots of them. It is passed to the authority.

Are you an agent acting on behalf of the applicant?

( ) Yes (•) No

Put "no" if you are applying on your own behalf or on behalf of a business you own or work for.

Applicant Details

* First name	Jan
* Family name	Hurban
* E-mail	jan.hurban@wzpackaging.com
Main telephone number	07903208586
Other telephone number	01746 713016

Include country code.

☐ Indicate here if you would prefer not to be contacted by telephone

Are you:

(•) Applying as a business or organisation, including as a sole trader

( ) Applying as an individual

A sole trader is a business owned by one person without any special legal structure. Applying as an individual means you are applying so you can be employed, or for some other personal reason, such as following a hobby.

Applicant Business

* Is your business registered in the UK with Companies House? (•) Yes ( ) No

* Registration number		8541340
* Business name		WZ PACKAGING LIMITED
* VAT number	GB	1701 615 40
* Legal status		Private Limited Company

If your business is registered, use its registered name.

Put "none" if you are not registered for VAT.

Continued from previous page...

* Your position in the business	Managing Director	
Home country	United Kingdom	The country where the headquarters of your business is located.

Registered Address

Address registered with Companies House.

* Building number or name	WZ Packaging,
* Street	Halesfield 18
District	
* City or town	Telford
County or administrative area	Shropshire
* Postcode	TF7 4JS
* Country	United Kingdom

Section 2 of 15

APPLICANT DETAILS

* Name of the installation	WZ Packaging Ltd

Please give the address of the site of the installation

Address

* Building number or name	18
* Street	Halesfield 18
District	
* City or town	Telford
County or administrative area	Shropshire
Postcode	TF74JS
* Country	United Kingdom
Telephone number	01746 713000
Ordnance Survey national grid reference 8 characters, for example SJ123456	

Existing Authorisations

Please give details of any existing LAPC or IPC authorisation for the installation, or any waste management licences or water discharge consents, including reference number(s) and type(s)

Continued from previous page...

We have the A2 permit in Bridgnorth (Permit reference: P14/1/2/40P) , and we were trying to apply to transfer the permit to Telford. That was original intention as the scope of the production / manufacturing as well as waste treatment remained the same.

Section 3 of 15

THE OPERATOR

Please provide the information requested about the "Operator", which means the person who it is proposed will have control over the installation in accordance with the permit (if granted)

Full name of company, partnership or corporate body: WZ Packaging Limited

Trading/business name (if different from above):

Registered Address

Is the address the same as (or similar to) the address given in section one?

(•) Yes ( ) No

If "Yes" is selected you can re-use the details from section one, or amend them as required. Select "No" to enter a completely new set of details.

Building number or name: Halesfield 18,

Street:

District:

City or town: Telford

County or administrative area: Shropshire

Postcode: TF7 4JS

Country: United Kingdom

Is the principal address the same as the registered address?

(•) Yes ( ) No

Holding Companies

Is the operator a subsidiary of a holding company within the meaning of Section 1159 of the Companies Act 2006?

( ) Yes (•) No

Section 4 of 15

ABOUT THE INSTALLATION

Continued from previous page...

Please enter details of all the current activities in operation at the whole installation.

Please identify all activities listed in schedule 1 to the EP regulations that are, or are proposed, to be carried out in the stationary technical unit of the installation.

Please identify any directly associated activities that are, or are proposed, to be carried out on the same site which:

* have a technical connection with the activities in the stationary technical unit
* could have an effect on pollution

Please quote the chapter number, section number, A(2) or B, then paragraph and sub-paragraph number as shown in Part 2 of Schedule 1 to the EP regulations.

[For example, Manufacturing glass and glass fibre, unless falling within Part A(1) of that Section, where melting capacity of the plant is more than 20 tonnes per day, would be listed as Chapter 3, Section 3.3, Part A(2)(a).]

Activities in the stationary technical unit

Activity listed in Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2016 or associated activity

Main Activity

S 6.4 (A2)

"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 150kg per hour or more than 200 tonnes per year".

Description of Specified Activity

GLUE LAMINATING

Machine 339 is a Kroenert glue lamination and in line lacquering unit. Single colour print facility. The adhesive used is a water based sodium silicate. Ink is applied to aluminium and adhesive is applied to bind the foil, paper, plastic film etc.
Maximum width 1250mm.
Minimum width 400mm.
Gauge range:
Aluminium foil 6µ to 30µ
Paper up to 100gsm
Coating type:
Nitrocellulose or vinyl
Coating weight:
0.25 - 2.0 gsm

WAX LAMINATING

Machine 341 is a Pak wax lamination and in line lacquering unit. Single colour print facility. The wax used is paraffin based. Ink is applied to aluminium and wax is applied to bind the foil, paper, plastic film etc.
Maximum width 1250mm.
Minimum width 600mm.
Gauge range:
Aluminium foil 6µ to 30µ
Paper up to 100gsm
Coating type:
Nitrocellulose
Coating weight:
Ink: 0.25 - 2.0 gsm
Wax 2 - 20gsm

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GRAVURE PRINTING AND COLOURING

The installation comprises of 3 printing presses and 2 colouring machines:-

Mc 334 A 8 stand Rotomec gravure printer with reverse printing capability.
Maximum width 1020mm.
Minimum width 700mm.
Gauge range:
Aluminium foil 8µ to 40µWZ Packaging LEV Report February 2019
Coating type:
Nitrocellulose and vinyl
Coating weight:
Ink: 0.25 - 1.5 gsm per unit

Mc 337 A 7 stand Cerutti gravure prter with reverse printing capability.
Maximum width 800mm.
Minimum width 450mm.
Gauge range:
Aluminium foil 8µ to 50µ
Paper up to 135gsm
Coating type:
Nitrocellulose and vinyl
Coating weight:
Ink: 0.25 - 1.5 gsm per unit

Mc 338 A 5 stand Halley gravure printer - 5 colours in register.
Maximum width 800mm.
Minimum width 450mm.
Gauge range:
Aluminium foil 9µ to 50µ
Paper up to 100gsm
Coating type:
Nitrocellulose and vinyl
Coating weight:
Ink: 0.25 - 1.5 gsm per unit

Solvents are stored in tanks in the ink mixing room and pumped to discharge points alongside the presses to be applied to the printing units to alter ink viscosity as required. The solvent based inks are applied to print cylinders, drying is carried out by heated blowers. Emissions from the printing and drying process are currently vented to the atmosphere, until the RTO is up and running.

Mc 364 A 3 stand Tecmo colouring / heatsealing gravure and single colour random print facility.
Maximum width 1000mm.
Minimum width 500mm.
Gauge range:
Aluminium foil 20µ to 70µ
Coating type:
Nitrocellulose and vinyl
Coating weight:
Ink: 0.25 - 6.0 gsm

Mc 365 A 1 stand Kroenert colouring / heatsealing gravure /roller coating. Single colour random print facility.
Maximum width 1290mm.
Minimum width 800mm.

Continued from previous page...

Gauge range:
Aluminium foil 38µ to 125µ
Coating type:
Nitrocellulose, vinyl and epoxy
Coating weight:
Ink: 0.25 - 4.0 gsm / 7 - 8gsm 2 passes

The 365 press runs primarily container foil using vinyl and epoxy coatings. The annual VOC's associated with this work have been calculated at 15188 kgs.
The other presses all print primarily nc coatings. The annual VOC's associated with this work have been calculated at 223325 kgs.
Annual production is approximately 1000-2000 tonnes of converted aluminium or aluminium / paper based packaging materials. The annual VOC's associated with all this work have been calculated at 444777 kgs. This includes all the neat solvent dispensed for ink thinning, cleaning etc:- Appendix 51 VOC's extrapolated 2018
All emissions associated with machines are currently vented to the atmosphere via local exhaust ventilation until the ducting to the RTO is connected. A copy of the relevant LEV report is attached:-
Document reference:- Appendix 1 WZ Packaging LEV Report February 2019

Schedule 1 reference: S 6.4 (A2)

Add another activity

Directly associated activities

Directly Associated Activity

S6.5 (B1)
Manufacturing or formulating printing ink or any other coating material, or involving the use of, an organic solvent, where the carrying out of the activity is likely to involve the use of 100 tonnes or more of organic solvents in any period of 12 months

The mixing of printing ink in Ink Mixing (colour) Room
The blending process involves mixing the base ink with a predetermined quantity of VOC to a required specification. Inks and lacquers are mixed into half barrels and manually transported to the printing lines. Inks vary according to the type of machinery used to apply them and the end use of the packaging.
Example of NC base ink MSDS
Document reference:- Appendix 2 WZ61489F Rhodamine
Example of vinyl base ink MSDS
Document reference:- Appendix 3 WB9030YG01 BS red
Example of epoxy base ink MSDS
Document reference:- Appendix 4 MSDS EX-8350 EX8350 EN Copper epoxy
Example of Heatseal MSDS
Document reference:- Appendix 5 WP720ZSG Polyester Heatseal P48

Other uses for VOC materials within the process may include base coat application (applying a coating to a substrate that will then allow the ink to adhere to it), use within adhesives applied during the lamination process, viscosity control on press, and for cleaning purposes.

There is an external chemical storage area for the bulk storage of chemicals on site. This area is bunded and has a solid impervious surface. All raw materials are controlled using SAGE software on the companies computer system.

WZ Packaging operates an enviromental management system.

Continued from previous page...

Document reference:- Appendix 6 STRUCTURES, RESPONSIBILITIES & AUTHORITIES
Appendix 7 EHHS_Statement_v6

Operational procedures can be demonstrated with the attached production workflow diagram
Document reference:- Appendix 8 Manufacturing_Workflow(top)v4 20190204el

Training procedures can be demonstrated with the attached documents
Document reference:- Appendix 9 TRAINING PLAN 2019
Document reference:- Appendix 10 TRAINING & DEVELOPMENT POLICY - V4.2016
Document reference:- Appendix 11 Print _Training_Modules_V3
Document reference:- Appendix 12 Colour room training 2018

Maintenance procedures can be demonstrated with the attached documents
Document reference:- Appendix 13 Site_Standards_Maintenance_Procedure_Guidelines_V4
Document reference:- Appendix 14 Maintenance_ System_Guidelines_V3

Accident/incident procedures can be demonstrated with the attached documents
Document reference:- Appendix 15 Accident&IncidentProc.V2.2018
Document reference:- Appendix 16 Hygiene incident form

Waste management procedures can be demonstrated with the attached document
Document reference:- Appendix 17 waste disposal PROCEDURE
Document reference:- Appendix 18 waste agreement v2

Schedule 1 reference: S6.5 (B1)

Directly associated activities

Schedule 14 S7 SED Activities Part B(a)
Other rotogravure, flexography, rotary screen printing, laminating or varnishing units, where the carrying out of the activity is likely to exceed the solvent consumption threshold of 15 tonnes/year.

LAMINATING

The machines used for laminating apply liquid coating/lacquers or inks to aluminium foil or other substrates and apply adhesive or wax to bind foil, thin strip, paper, plastic film etc.

VARNISHING
The machines used for varnishing apply liquid coating/lacquers to aluminium foil, in order to impart protective gloss or matt coatings, slip or non slip coatings and heatseal coatings.

At the current time the RTO is not operational but WZ Packaging have plans in place to connect all the converting and finishing machines to the stack. A description of the RTO system along with mechanical and electrical maintenance schedules is attached.
Document reference:- Appendix 19 RTO System description

Schedule 1 reference: Schedule 14 S7 SED Activities Part B(a)

Continued from previous page...

Remove activity

Add another associated activity

Why Is The Application Being Made?

- ○ The installation is new
- ◉ The installation is existing, but changes to the installation or to the EP Regulations mean that an LA-IPPC A2 permit is required

Site Maps

Please provide a suitable map showing the location of the installation, clearly defining the chimney location and oil storage tank

Document reference: Appendix 34 A2 Permit application P2643 M 100 RTO Duct Layout_pdf
Appendix 42 A2 permit application Planning permission RTO_doc
Appendix 32 A2 permit application RTO Foundation Position Layout
Appendix 33 A2 permit application SiteLayoutPlan-780-

Please provide a suitable plan showing the layout of activities on the site, including bulk storage of materials, waste storage areas and any external emission points to atmosphere

Document reference: Appendix 34 A2 Permit application P2643 M 100 RTO Duct Layout_pdf

Please provide a suitable plan showing the site drainage system and all discharge points to drainage or water courses

Document reference: Appendix 35 A2 Permit applicationMetroRod Drainage Schematics
Appendix 20 A2 Permit application site map179-1114-T.

Section 5 of 15

THE INSTALLATION

Please provide information about the aspects of your installation. We need this information to determine whether you will operate the installation in a way in which all the environmental requirements of the EP Regulations are met.

Describe the proposed installation and activities and identify the foreseeable emissions to air, water and land from each stage of the process (this will include any foreseeable emissions during start up, shut down and any breakdown/abnormal operation). The use of process flow diagrams may aid to simplify the operations.

Details and/or document reference if attachment

The installation consists of 3 gravure printing presses, 2 gravure coaters and 2 laminating (wax and water--based glue)/ in-line coaters, and other associated plant and equipment (e.g. slitting, embossing) for the production of flexible packaging for the food industry and other non food sectors (industrial, cosmetic etc).

The following description divides the installation into its elements and activities both those activities scheduled under the respective regulations and those non scheduled elements required to be regulated because of their polluting potential and that have a direct association and a technical connection to the scheduled activities:

Continued from previous page...

Attached raw material storage and movement map is attached (Appendix 36 A2 Permit application Material movement site map 2018.png)

The installation comprises:

1 Raw material storage
a) Substrate - foil, paper, film
b) Ink and solvents - in the bunded area and in Ink/Colour Room

2 Conversion (Printing / Laminating / Coating)
a) Printing
b) Laminating
c) Coating
3 Waste Storage and solvent recovery
a) Waste Storage
b) Solvent Recovery

4) Regenerative Thermal Oxidiser (RTO) (Haden) (Not yet operational)

1 Raw Material Storage
a)
Substrates (whether foil, paper or film) will be stored in designated areas on stillages, flats or pallets within Bays 1, 2 & 3, in small amounts close to the associated converting machine prior to running (print, laminate or coat). No emissions or waste created from this element of the process.
b)
An external bunded area is situated at the rear (north east) of the site, adjacent to the colour mixing room, accomodating all purchased and delivered inks and solvents. Deliveries take the form of 1 tonne IBC's, 205 litre drums and solvent mostly in IBCs with the plan to transfer into the 60,000 litre tank which is housed within the bunded area.

Raw materials in the form of inks and solvents are removed from the storage area by ink technicians as applicable.

Ink preparation

Inks and solvent are transported to the fully bunded Ink Mixing Room directly by IBC's / drums physically moved and temporarily stored for use (in future via solvent pipe-work from the tank in the storage area). Specific formulations of ink are mixed according to the desired specification and are measured out on programmable scales to ensure consistency. Mixing takes place in half drums of no more than 75kgs. Post mix, the half drums are then transported manually to the converting machines.

Main components of Inks mixing are: Nitrocellulose, Vinyl and Epoxy based ink systems, Heat seal and protective lacquers, all aimed for primary food packaging (direct or indirect food contact).
Solvents associated with these inks are Ethyl Acetate (50% of usage), TSDA3 (40%), and MEK (10%), Appendices 2, 3, 4 & 5 MSDS Sheets

A Rexson dispensing system is used for the precise dispensing of inks. All containers are enclosed and therefore little fugitive evaporation is taking place. An LEV system is incorporated at low level to mitigate any build up of VOC's in the mixing room. These fugitive emissions are vented to atmosphere (estimated well below 0.3g/m3).

2 Conversion
a) Printing
3 Printing presses are operated at the site, all based on the same rotogravure technology. Ink and solvent are mixed to a specific ink formulation and pumped into the machine via the circulator and ink tray. The press is then operated, the respective gravure print cylinders coated with ink and appropriate substrate fed into the machine and processed. The cylinder prints out the desired design onto the substrate. The printed substrate then passes through drying hoods to dry off any remaining solvents. The printed substrate 'jumbo' reel is then sent to the finishing department for next phase of

Continued from previous page...

processing (slitting, embossing etc).

The printing presses on site are;
* 337 Cerutti 7 colour rotogravure printing press
* 334 Rotomec 8 colour rotogravure printing press
* 338 Halley 5 colour rotogravure printing press

All printing machines have coating units and circulators with covers in order to minimize fugitive emissions. All machines include LEV vented to main process ductwork and eventually to RTO.
Bay 1 and 2 have 6 louvers to keep the ventilation of the building and balancing the air circulation required for the process of the machines.

b) Laminating
one wax laminator with a single colour colouring / printing unit and one water based glue laminating with a single colour colouring / printing unit are operated at site. The laminating machines apply liquid coating / lacquers to substrates and apply respective adhesives (wax or water based glue) to bind 2no substrates together (foil/paper, foil/film etc).

The laminating presses on site:

* 339 Kroenert Glue Laminator
* 341 Kroenert Wax Laminator

Water based glue has only water vapors exhausted via drying system to atmosphere. Laminating unit produces a fugitive source of solvent emissions, ventilated via LEV to atmosphere (estimated well below 0.1g/m3).

Wax (paraffin and similar) is being re-melted and re-used and only small amount (2-3% is being disposed) as solids waste using dedicated waste disposal company. Fugitive emissions are produced via the colouring/coating unit when in use.

c) Coating
one single colour coater and one triple colour coater are operated at site. The coaters use the same ink application methodology as the printing presses.

The coating presses on site:

* 364 triple colour coater
* 365 single colour coater

Both coating machines represent a source of fugitive solvent based emissions, both are vented using LEV to atmosphere. In case of both the estimated concentrations of LEVs are below 0.5g/m3.

3 Waste Storage and solvent recovery

a) Solvent based waste stream:

a1) Inks after use are being returned to the Ink room and where possible are being reused in full on subsequent jobs. Unusable ink waste is stored in drums in the bunded yard area to be disposed of by accredited waste companies once a full lorry load has accumulated.

a2) Solvent waste is generated from the cleaning process. This dirty solvent is being recovered using the Renzman Distillation plant creating
i) recovered solvents
ii) treated waste.
Recovered solvents are being used again either for cleaning or as part of the inks.
Treated waste is disposed of as unusable ink waste. The amount generated is 10000kgs/annum:- Appendix 49 Solvent

Continued from previous page...

waste stream quantitative

The Ink Mixing Room where the Renzmann is housed is vented without abatement.
The Renzmann wash / solvent recovery plant itself is linked directly to the RTO.

b) Water based waste stream:
Water being used for cleaning is held in IBC in bunded yard area.
Glue waste is held in the bunded yard area. 1 -2 Tonnes is generated annually and is held in plastic IBC's until uplift is arranged by accredited waste company.
The only other water waste is from office and factory hygiene facilities, this being discharged into the sewage system.

c) Solid /sludge waste stream:
Solid / sludge wax waste and dirty cleaning rags are kept separate and are stored in the appropriate waste storage area in closed 200 Litre lidded drums prior to being uplifted by the appropriate waste disposal contractor once a full load is accumulated. 3240 kgs of solid waste is produced /annum:- Appendix 49 Solvent waste stream quantitative

d) Other waste:
Wooden packaging (inbound raw material wooden boxes and pallets), disposed of to dedicated contractor.
Aluminium and other raw materials (paper, and film) as a main production waste stream is being bailed and sent for recycling. Approximately 5% of the input weight is recycled 156 Tonnes / Annum. Appendix 48 Recycled waste stream quantities

Solid wastes from the installation are stored in dedicated skips stored in the dry waste area as displayed on the respective site plan.
General waste is disposed of after separating it from paper and cardboard waste
Paper and cardboard waste is recycled, by regional waste contractor.
There are no land emissions.
Bunded yard and bunded ink room are built on concrete slabs to protect ground from any accidental spillages of solvents and inks. Company has a number of spill kits located around the factory and outside for immediate containment and elimination of any accidental spillages.

4) RTO
All of the coating or printing processes emissions are redirected to the RTO.
The design of the RTO system is such that all converting machines with lacquering / printing unit have diversion valves to redirect the process air from venting to:-
i)atmosphere
When press is idle or during the heating up of the hoods during press start up.
ii)RTO
When press is operating (coating or printing), which would burn most of the solvents and then vent to atmosphere through the stack CO2 and water vapors (with residual VOCs).
Details of the RTO system is attached in Appendix 19 Permit application RTO System Description.
Location of the RTO with elevations is illustrated on the attached documents Appendix 32 A2 permit application RTO Foundation Position Layout
Appendix 33 A2 permit application SiteLayoutPlan-780-
D1 calculation for the stack is also included (Appendix 37 permit application D1 Calcs for WZ_pdf.
In case of malfunction of the RTO the protection system would divert all processed air to atmosphere and trigger the alarm.
The RTO is able to monitor airflow and temperature of the canister.

Continued from previous page...

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

- atmospheric emissions should be categorised under the following

(i) Point source (e.g., chimney/vent, identified by a number and detailed on a plan)
(ii) Fugitive source (e.g., from stockpiles/storage areas).

If any monitoring has been undertaken please provide the details of emission concentrations and quantify in terms of mass emissions. If no monitoring has been undertaken please state this. (Emission concentration = e.g., milligrams per cubic metre of air; mass emission = e.g., grams per hour, tonnes per year)

- water emissions should be identified at discharge points and copies of any discharge consents from either the Environment Agency or sewerage undertaker should be submitted, detailing the permitted discharge limits.

Details and/or document reference if attachment

1) Mc 339 glue laminator
i) LEV Duct vented to atmosphere Average VOC 638.33mg/m3 Document reference Appendix 22 Kroenert 339 voc

2) Mc 341 wax laminator
i) LEV Duct vented to atmosphere Average VOC 556.76mg/m3 Document reference Appendix 29 Wax melt 341 voc

3) Mc 334 Rotomec 8 colour printer
i) LEV Duct vented to atmosphere Average VOC 698.10mg/m3 Document reference Appendix 27 Rotomec 334 voc

4) Mc 337 Cerutti 7 colour printer
i) LEV Duct vented to atmosphere Average VOC 606.39mg/m3 Document reference Appendix 25 Cerutti 337 voc

5) Mc 338 Halley 5 colour printer
i) LEV Duct vented to atmosphere Average VOC 1050.56mg/m3 Document reference Appendix 26 Halley 338 voc

6) Mc 364 Tecmo 3 tier coater
i) LEV Duct vented to atmosphere Average VOC 329.73mg/m3 Document reference Appendix 28 Tecmo 364 voc

7) Mc 365 Kroenert single colour coater
i) LEV Duct vented to atmosphere Average VOC 829.37mg/m3 Document reference Appendix 29 Kroenert 365 voc

8) Renzman washing and distilation unit
ii) Fugitive emissions from washing plant estimated at 500 mg/m3

9) Personal air monitoring
i) Appendix 44 A2 permit application TID Respirable dust volatile organic compounds survey Feb 2019.

No water emissions anticipated.

A solvent management plan will be written once the RTO is connected.

For each emission identified, describe the current and proposed technology and other techniques for preventing or, where that is not practicable, generally reducing the emissions and the impact on the environment as a whole. If no techniques are currently used and the emission goes directly to the environment without abatement or treatment this should be stated.

Continued from previous page...

Details and/or document reference if attachment

At present all emissions go directly to the environment without abatement or treatment.
In the future it is intended that all emissions from the converting process will be ducted directly to the RTO's (Regenerative Thermal Oxidiser) - VOC abatement system. The abatement is based upon thermal destruction of VOC's (Volatile Organic Compounds) at around 880'C. This form of abatement methodology is considered best industry practice for the flexible packaging sector.
All printing/coating machines have the option to be diverted to the RTO (when operating), Default safe position is to the atmosphere.
Given the current utilisation level of the printing machines it is envisaged that the RTO capacity is sufficient to cope with the production. However many of the machines show very little concentrations, below the auto thermal level (apx. 1.5g/m3). Therefore study is being performed on the effectiveness of operation and potential improvements of concentrations Alternative coatings (water based are being assessed as well to be replaced on certain processes (e.g. glue lamination)

Monitoring data is not yet available. However, with respect to VOC and Non-VOC emissions, the limits and parameters set out in the previous environmental permit (16/00016/PPCA2) are proposed. VOC emmissions of 50mg/m3 will be likely difficult to achieve due to the age of the RTO plant, however this has not been yet tested and also we undertand there are a number of improvements possible to recondition the RTO once the measurements have provided detailed results.

Identify the raw and auxiliary materials, other substances and water that you propose to use in carrying out the activities of section 4.

Details and/or document reference if attachment

Alu Foil (6.5-130micron foil, >1000tonnes / year)
Paper (18gsm - 90gsm paper, food grade, 500-1000 tonnes / year)
Film (generally 10-40 micron OPP)
Adhesive (water based Glue or Wax)
Cardboard (Packing items such as interleaves and spindles)
Ink / Solvents (attached consumption and waste details (Appendix 38 V2 Permit figures 2019))
Water for cleaning - very little (1-2 IBC/year)

Characterise and quantify each waste stream from the installation and describe the proposed measures for waste prevention and reduction. Please also include waste management, issues storage and handling of the waste.

[For each waste stream, identify if an environmental appraisal has been undertaken, and provide details; if not please state why an appraisal has not been undertaken. If you propose any disposal of waste, explain why recovery of that waste is technically and economically impracticable, and go on to describe the measures planned to minimise the production of that waste so as to avoid or reduce any impact on the environment.]

Details and/or document reference if attachment

Alu Foil:
All alu foil waste (whether trim waste, reel cut off or slit reel form) is collated, compacted, baled and sold at scrap value into Alu Foil recycling chain to recognised third parties. Aluminium is a fully recyclable material and one of the most abundant materials on Earth, with very little environmental impact if recycled. No landfill is expected. (approx 5% waste from input - i. e. 50-80T/year) Appendix 48 Recycled waste stream quantities

Paper:
All process paper (whether trim waste, reel cut off or slit reel form) is collated, compacted, baled and sold at scrap value into paper recycling chain to recognized third parties. Note: all substrate process waste is segregated at source. No dry waste is mixed. Laminated paper (to aluminium) is usually used as an energy source with Aluminium recovered. Plain paper is separated for recycling. We are often able to source FSC graded paper. (waste represents 20-30T/Year) Appendix 48 Recycled waste stream quantities

Adhesive (Glue or Wax):

Continued from previous page...

Any adhesives (whether Glue or Wax) are removed from machine at the end of respective production run, placed into applicable storage), recorded and then re-used for subsequent specification matching orders. (1-2 tonnes of waste is generated per annum)

Cardboard (Packing items such as interleaves and spindles):
Any cardboard scrap is segregated from process waste and sold at respective scrap paper / cardboard costs.

Ink / Solvents :
All unused ink is returned from press to ink room at the end of each respective order. Where possible, ink is reworked into future ink mixes using Rexson software to help formulate using said press returns.

For illustration of raw materials and other materials in our process including recycled streams attached is the Valpak waste report for 2018. (Appendix 39 A2 permit application Valpak Data 2018)
Attached is the template of our Waste agreement (Appendix 18 A2 permit application waste agreement v2)

'Yield' improvements (minimising waste) are a key focus and key driver for the business management of WZ Packaging. We have shown year on year improvement since inception as Moneta Packaging in 2013 where we operated at 89% performance yield through to an average operating yield of 91.5% as WZ Packaging(December 2015). We are striving to achieve 93% operating performance yields as recognised in our Management Reviews. Yield /Waste is representative of the key process inputs - inks / alu foil / paper / adhesive. Waste is measured at each stage and can be attributed to specific process, issue, type of material and quantified and categorised for each individual order. Therefore we are able to manage waste and keep improving the yields.

Identify if there may be a discharge of any list I or list II substance and if any are identified, explain how the requirements of the Groundwater Regulations 1998 (SI 2746) have been addressed (see attached lists). Also describe the current techniques used to prevent and reduce discharges to groundwater.

Details and/or document reference if attachment

There is nil return to the public sewer from the processes on site. Sewage is domestic only in nature. There are no emissions on site to surface water drainage systems.

Provide a breakdown of the proposed energy consumption and generation by source and end-use, and describe the proposed measures for improvement of energy efficiency. If you have entered a climate change levy agreement please provide details.

Details and/or document reference if attachment

Please find attached the report of energy consumption by major machinery on site. (Appendix 40 A2 permit application WZP HF18 Energy and Gas consumption 20190301.xlsx)

Machines are energy intense due to high energy required for drying purposes. we are trying to optmise the use of machinery more towards gas-fired machines and avoid electricity-heated machines which are less efficient.

Please see Appendix 7 A2 permit application EHHS_Statement_v6. for reference to energy efficiency improvements.

As part of machine installations, isolation dampers are being introduced to every print station to improve efficiencies across every primary machine. For example, if Rotomec 8 colour print machine is only running 1no x colour, then 7 isolation dampers will close, leading to only the appropriate 'pull off' to the RTO's.

The building envelope has been designed to be very energy efficient;

New heating system installed, with de-stratification fans situated in the roof space to properly distribute the generated warm air though-out the work space / factory.
New Roof and wall cladding installed to improve overall thermal efficiencies.
New LED lighting fitted throughput both factory and office areas including movement sensitive operated lighting in office

Continued from previous page...

areas.

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

Details and/or document reference if attachment

In the event of abatement failure, the VOC abatement system has a visual traffic light warning system that informs the operational team of any issues, whereby the processes involving solvent use will be stopped immediately until the problem is resolved and vented to atmosphere for safety purposes. Downtime of the RTO is to be minimised by implementing and reviewing maintenance plan and possible improvments. (bearing on the fan has been recently repaired, prior to operation).

Unintential releases of solvents - ie spillage is managed by spill-kits distributed around the factory.
The bunded areas in the yard and in the Ink room are designed to contain any accidental spillages of ink and solvent

No other unintentional releases are expected, as no water is being used in the process and all bunded areas are away from water routes or drainage system

Detail the following with respect to noise and vibration

(i) the main sources of environmental noise and vibration as identified from your proposed installations' activities (including infrequent sources);
(ii) identify the nearest noise sensitive locations and include any relevant environmental noise measurement surveys which have been undertaken;
(iii) the current and proposed technology and techniques for the control of noise.

If no assessment has been carried out, please explain.

Details and/or document reference if attachment

Noise assessment has been carried out recently Appendix 43 A2 permit application ocupational noise survey feb 2019. No external noise assessment has been carried out at time of report submittance due to RTO not being operational and so noise levels are not representative of plant in operation. Most of the processes are inside the factory, and also due to industrial location and closest other industrial buildings located only 60-100m from our main building, we consider environmental noise and vibration pollution risk to be low.

(i) The anticipated primary source of noise emanating from the plant will be mobile fleet traffic noise inclusive of Fork Lift Truck (FLT) and Pedestrian Powered Truck (PPT). This takes the form of general movement and horn sounding. The standard production equipment does not emit any significant noise levels that would be anticpated to be heard in the closest noise sensitive location (see (ii)).

(ii) The nearest noise sensitive location is Severn Gorge Park (more than 200m distant closest building). Between the installation and Severn Gorge Park is the A442 (Brockton Way), a primary through road for the surrounding area. No environmental noise measurement has been carried out due to the low level noise levels anticipated from the installation, the major roadway and industrial park in-between.

(iii) All plant equipment to be maintained to optimum conditions to ensure no extraneous noise caused by poor machine performance.

Continued from previous page...

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

Details and/or document reference if attachment

WZ Packaging Ltd will have an abatement system for controlling VOC emissions. Annual Emissions Monitoring will be undertaken by a recognised MCERTS qualified contractor. Base line monitoring will be undertaken upon installation of the RTO's.
Daily atmospheric survey. Appendix 45 A2 permit application RTO Visible gas and odour emmissions log.
Appendix 46 A2 permit application Ringelmann smoke chart.

Describe the proposed measures to be taken, to avoid any pollution risk to land and return the site of the installation to a satisfactory state upon definitive cessation of activities, you may wish to refer to the site report requested in the next section.

Details and/or document reference if attachment

Primary source of potential land pollution will be Ink Compound / Storage area. This is bunded area, with restricted access, with local pump out facility to remove any accidental spillage. This is further mitigated by spill kits situated in and around the area. No spilliges or events raising pollution risk has been recorded over last 3 years since on site in Telford nor in previous location in Bridgnorth.

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

Details and/or document reference if attachment

Please see Appendix 7 A2 permit application EHHS Statement v6 for reference to energy efficiency improvements. Spill kits register is located on within shared documents.

Section 6 of 15

SITE REPORT

Please provide a site report which demonstrates the condition of the land on the site of the installation. The report must identify any existing or potential sources of contamination, quantifying the presence of materials in, on or under the land which may constitute a pollution risk either in terms of toxic or polluting potential or the potential generation of toxic, flammable or asphyxiant gases. The report should consider, in relation to such sources the potential existence of pathways via which the contaminants travel, and the proximity and nature of potentially sensitive receptors.

During consideration of the likely presence of materials and the design of any intrusive sampling strategies, particular regard should be given to the locations and extent of any former or existing potentially contaminative uses and the locations, nature and likely emissions to land of processes forming part of the installation.
It is acceptable to provide site reports undertaken for other purposes, (e.g., planning applications, which have been carried out up to 6 months prior to submitting this application). Older site reports may, at the discretion of the local authority, be accepted where a further site survey and risk assessment based on the present condition of the site are submitted.

Note: As a first step you should undertake a desk study to produce the information necessary for the report. If that study suggests that there are matters which warrant more detailed investigation, then site surveying work may be necessary.

Details and/or document reference if attachment

Appendix 41 A2 permit application Moneta_Site_Report_Phase 1 Assessment - H18_A2V1

Continued from previous page...

This report has been compliled as a due diligence during the acquisition of the Halesfield 18 in 2014 (November).
Since then the site has been cleaned up, asbestos removed, new cladding and roofing provided.
Old oil heating has been removed including the tank and replaced by new gas heating.

As per the previous section rrisk from current operation of any contamination since the operation on site can remain Ink and Solvents yard storage and ink room bunded areas.
Any inks and solvents are highly volatile therefore any spilage would likelly evaporate very quickly. All inks are food contact (direct or indirect) designed therefore any even before they dry and severe contamination of waters or soil is unlikely.

Section 7 of 15

IMPACT ON THE ENVIRONMENT

Please provide information about the impact the installations' emissions may have on the environment.

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

Details and/or document reference if attachment

Instalation is in industrial zone, separated from the residential area by A442 dual carriage road and other industrial buildings, including similar printing company. Nearest industrial building (printing company is 60m visual line) separated by road. RTO stack has had a D1 calculation (attached - Appendix 37 A2 permit application D1 Calcs for WZ .pdf), which was provided as a part of the planning permission.

WZ Packaging (or as Moneta Packaging) has neither received any complaints related to air, land or water whilst operating at it's Bridgnorth facility, nor had any release of toxic / hazardous materials. All environmental controls, process procedures and policies have been transferred to the Halesfield facility.

With the exception of an odour complaint in June 2016 there have been no other complaints from members of the public regarding the Halesfield installation's emissions.

Provide an assessment of whether the installation is likely to have a significant effect on sites of special scientific interest (SSSIs) or European Sites and, if it is, provide an assessment of the implications of the installation for that site, for the purposes of the Conservation (Natural Habitats etc) Regulations 1994.

Details and/or document reference if attachment

The installation is not likely to have a significant effect on sites of special scientific interest or European Sites.

Section 8 of 15

ENVIRONMENTAL STATEMENTS AND THE NON TECHNICAL SUMMARY

Has an environmental impact assessment been carried out under The Town and Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 1999/293, or for any other reason with respect to the installation?

○ Yes ◉ No

Have there been any screening opinions or directions?

○ Yes ◉ No

Please provide a non-technical summary of all the information required above. This will enable the public to understand your installation and its environmental impact when viewing the public register.

Details and/or document reference if attachment

WZ Packaging Ltd is a manufacturer and supplier of flexible packaging products into the food (primarily confectionery &

Continued from previous page...

Dairy), cosmetics and industrial markets.

Primary substrate material used is aluminium foil, alongside paper, film, adhesives and ink dependent on make up of final product.

Rotogravure based printing / coating applications are used to colour / coat / print individual designs on specified material types, which are then slit down to size, packaged, palletized and distributed to respective customers.

Primary Operations on site are:

Printing
Coating
Laminating (Glue or Wax)
Slitting
Embossing
Packing

Most ink types used in our processes are solvent based and designed for direct or indirect food contact. All solvent based machines are connected to an RTO (Regenerative Thermal Oxidizer) which reduces solvent emissions to recognised accepted minimal levels.

We operate under strict ISO 9001 and BRC standards.
A combination of engineering, industry best practice, policies, procedures and monitoring programs are in place to reduce environmental impact wherever possible.

* Most of the production wast is highly recyclable (Aluminium, paper, or inks / solvents) for which we are using recycling programs and use of authorised waste handlers.
* Bunded areas for all ink / solvent storage areas are designed to prevent any soil or water contamination.
* Solvent Abatement System (RTO) as supplied by Haden handles all process solvent emissions and air pollution.
* Waste reduction a key business driver, with year on year improvements targeted.

Section 9 of 15

STATUTORY CONSULTEES

In which Primary Care Trust (formerly health authority)/ Health Board area is the installation located?

Telford & Wrekin Primary Care Trust

If premises are on a boundary please give names of all relevant authorities

Authority name

Add another authority

Could the installation involve the release of any substance into a sewer vested in a sewerage undertaker?

○ Yes ◉ No

Continued from previous page...

Are there any sites of special scientific interest (SSSIs) or European sites which are within 2 kilometres of the installation?

○ Yes ◉ No

Section 10 of 15

PLANNING STATUS

Where the installation may involve a specified waste management activity we cannot issue a permit unless one of the following applies. Please indicate which of the following applies to the installation. Note: In this instance your application may be referred to the Environment Agency for processing.

☒ You have planning permission

Document reference of attached decision notice

Ref: TWC/2017/0875
Attached as: Appendix 42 A2 permit application planning permission RTO_doc

☐ You have a certificate of lawful existing use of development

☐ You have an established use certificate

☐ The General Permitted Development Order 1995 applies

☐ You do not require planning permission

Section 11 of 15

ADDITIONAL INFORMATION

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

Details and/or document reference if attachment

WZ Packaging Ltd transferred operations from Bridgnorth, Shropshire (Permit reference: P14/1/2/40P) to Halesfield over the course of several months.
However, due to problems accessing the previous site, WZ Packaging Ltd was unable to relocate its original RTO to Halesfield as planned, which caused delay. Further delays were incurred after a new suitable RTO with sufficient size was sourced in January — February 2018.
The Declaration in Section 1 S of this form does not allow text to be inserted or boxes to be checked where there are asterisks. This has led to the form highlighting errors but we cannot correct this. This includes the requirement to state previous offences where indicated, so we have included the relevant information in this section instead. WZ Packaging Limited was prosecuted and fined on 10 September 2018 in relation to operating a regulated facility other than under and to the extent authorised by an environmental permit contrary to Regulations 38(1 and 39 of the Environmental Permitting (England and Wales) Regulations 2016. This was as a result of the issues described above. WZ Packaging Limited plead guilty.
Following the conclusion of the prosecution, this application is being submitted for a new permit as required by the court order of Shropshire Magistrates Court dated 10 September 2018.

Section 12 of 15

ANNUAL CHARGES

Please provide details of the address you wish invoices to be sent to and of someone we may contact about fees and charges within your finance section.

Continued from previous page...

Name

First name	Richard
Family name	Narburgh

Address

Building number or name	Halesfield 18
Street	
District	
City or town	Telford
County or administrative area	Shropshire
Postcode	TF7 4JS
Country	United Kingdom

Contact Details

Telephone number	01746 713010
Other telephone number	01746 713000
Please give any company purchase order number or other reference you wish to be used in relation to this fee	A2app_April2019

Section 13 of 15

COMMERCIAL CONFIDENTIALITY

Is there any information in the application that you wish to justify being kept from the public register on the grounds of commercial confidentiality?	○ Yes	◉ No
Is there any information in the application that you believe should be kept from the public register on the grounds of national security?	○ Yes	◉ No

Section 14 of 15

DATA PROTECTION

Continued from previous page...

The information you give will be used by the local authority to process your application. It will be placed on the relevant public register and used to monitor compliance with the permit conditions. We may also use and or disclose any of the information you give us in order to:

- Consult with the public, public bodies and other organisations,
- Carry out statistical analysis, research and development on environmental issues,
- Provide public register information to enquirers,
- Make sure you keep to the conditions of your permit and deal with any matters relating to your permit,
- Investigate possible breaches of environmental law and take any resulting action,
- Prevent breaches of environmental law,
- Offer you documents or services relating to environmental matters,
- Respond to requests for information under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 (if the Data Protection Act allows),
- Assess customer service satisfaction and improve our service.

We may pass on the information to agents/ representatives who we ask to do any of these things on our behalf.
It is an offence under regulation 38 of the EP regulations, for the purpose of obtaining a permit (for yourself or anyone else), to:

- Make a false statement which you know to be false or misleading in a material particular,
- Recklessly make a statement which is false or misleading in a material particular,
- Intentionally to make a false entry in any record required to be kept under any environmental permit condition,
- With intent to deceive, to forge or use a document issued or required for any purpose under any environmental permit condition.

If you make a false statement:

- We may prosecute you, and
- If you are convicted, you are liable to a fine or imprisonment (or both).

Section 15 of 15

PAYMENT DETAILS

This fee must be paid to the authority. If you complete the application online, you must pay it by debit or credit card.

This formality requires a fixed fee of £3218

DECLARATION

I/We certify that the information in this application is correct. I/We apply for a permit in respect of the particulars described in this application (including supporting documentation) I/We have supplied.

*

Please note that each individual operator must sign the declaration themselves, even if an agent is acting on their behalf.

Previous offences
I/We certify

*

The following offences have been committed in the previous five years which may be relevant to my/our competence to operating this installation in accordance with the regulations:

Continued from previous page...

I/We certify that the information in this application is correct. I/We apply for a permit in respect of the particulars
* described in this application (including supporting documentation) I/We have supplied.
Please note that each individual operator must sign the declaration themselves, even if an agent is acting on their behalf.

Is there any information in the application that you wish to justify being kept from the public register on the grounds of commercial or industrial confidentiality?
*

Is there any information in the application that you believe should be kept from the public register on the grounds of national security?

☐ Ticking this box indicates you have read and understood the above declaration

This section should be completed by the applicant, unless you answered "Yes" to the question "Are you an agent acting on behalf of the applicant?"

* Full name	Jan Hurban
* Capacity	Managing Director
* Date	08 / 04 / 2019 (dd / mm / yyyy)

Add another signatory

Once you're finished you need to do the following:
1. Save this form to your computer by clicking file/save as...
2. Go back to https://www.gov.uk/apply-for-a-licence/environmental-permitting/telford-and-wrekin/apply-1 to upload this file and continue with your application.
Don't forget to make sure you have all your supporting documentation to hand.

OFFICE USE ONLY

Applicant reference number	WZP_A2_App_April2019
Fee paid	
Payment provider reference	
ELMS Payment Reference	
Payment status	
Payment authorisation code	
Payment authorisation date	
Date and time submitted	
Approval deadline	
Error message	
Is Digitally signed	☐