

Operator	WZ Packaging Limited
Installation Address	Halesfield 18 Telford Shropshire TF7 4JS
Permit Reference	108/150921
Grid Reference	SJ709049
Registered Office	WZ Packaging Ltd Halesfield 18 Telford Shropshire TF7 4JS
Registered Number	08541340

WZ Packaging Limited ("The Operator") is hereby permitted by Telford & Wrekin Council ("The Regulator") to carry out the activity of surface treating substances, objects or products using organic solvents, in plant with a consumption capacity of more than 150kg or more per hour than 200 tonnes per year as defined under Schedule 1, Part 2, Section 6.4(A2)(a), of The Environmental Permitting (England and Wales) Regulations 2016 ("The Regulations"). The Operator is also carrying out a solvent Emission activity as described under Schedule 14 of the Regulations. To the extent authorised by and subject to the conditions of this Permit and within the installation boundary outlined in blue within Appendix 1 of this permit.

Signed:



Name: Clair Travis

Date: 15 September 2021

Environmental Health Consultant

Authorised by the Borough of Telford and Wrekin to sign in that behalf

Contact Details

The contact address, telephone number and email address for all correspondence in terms of the permit is as follows:

Public Protection
Telford and Wrekin Council
Addenbrooke House
Telford
TF3 4NT

Telephone: 01952 381818

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Contents

Introductory Note	1
Description of Permitted Activity	6
Permit Conditions	7
Permitted Activities	7
Plant and Equipment	8
Permit Management	8
General Requirements	8
Records	9
Written Environmental Management Systems	9
Emission Limits	10
Monitoring	11
Solvent management plan	13
Designated Materials	14
Waste audit	14
Energy audit	14
Resource Utilisation	14
Soil and groundwater monitoring	14
Operational Controls	14
General	14
Storage and delivery of materials	15
Cleaning	16
Solvent recovery	16
Waste handling	16
Soil and groundwater protection	17
Emissions	17
Incidents	18
Imminent danger	18
Noise and vibration	18
Odour	19
Cessation of Activities	19
Upgrade Plan	20
Interpretation of Terms	27

List of Appendices

Appendix 1 Location of Installation and installation boundary	21
Appendix 2 Site layout	21
Appendix 2 cont: Emission stacks and Emergency Bypass stacks (E.B) Map	23
Appendix 3 solvent management plan definitions	24
Appendix 4 Drainage Plan	26

List of Tables

Table 1 – Permitted activities	7
Table 2 – Permitted plant and equipment	8
Table 3 – Emission limits and monitoring frequency	11

Introductory Note

This Introductory provides relevant information related to this Permit

The following permit is granted to WZ Packaging Ltd as required under Regulation 13 of the environmental Permitting (England and Wales) Regulations 2016 ("the Regulations") to operate an installation to carry out the activity described in Schedule 1, Part 2, Section 6.4 Part A(2).

The permit is issued on the basis that the information provided by the applicant in support of the application for a permit was neither false nor misleading. Any change affecting the accuracy of such information shall be promptly notified, in writing, to Telford and Wrekin Council at the contact address.

The permit includes conditions that have to be complied with. It should be noted that aspects of the operation of the installation which are not regulated by specific conditions are subject to the 'Best Available Techniques' condition placed within the permit. WZ Packaging Ltd shall use best available techniques for preventing or, where that is not practicable, reducing emissions from the installation. Please note that techniques include both technology used and the way in which the installation is designed, built, maintained and operated.

Publications

The following Statutory publications are relevant to the installation:

- a) The Environmental Permitting (England and Wales) Regulations 2016 SI 2016 No1154 (as amended).
- b) The Pollution Prevention and Control Act 1999
- c) Council Directive 2010/75/EU of the European Parliament and of the Council on 24 November 2010 on Industrial emissions (integrated pollution prevention and control) known as the Industrial Emissions Directive.
- d) Council Directive 2008/98/EC of the European Parliament and of the Council on 19 November 2008 on waste.
- e) Council Directive 2000/60/EC of the European Parliament and of the council on 23 October 2000 on establishing a framework for community action in the field of water policy (water framework directive)
- f) Sector Guidance note SG6 Secretary of State's guidance for Surface Treatment using Solvents
- g) European Commission Reference Document (BREF) on Best Available Techniques on surface Treatments using Organic Solvents

Confidentiality

The permit requires the Operator to provide information to the Regulator. The Regulator will place the information onto the public register in accordance with the Regulations. If the Operator considers that any information provided is commercially confidential, they may apply to the Regulator to have such information withheld from the register as provided in the Regulations. To enable the Regulator to determine

whether the information is commercially confidential, the Operator must clearly identify the information in question and must specify clear and precise reasons.

Inspections and risk rating

Under the Regulations, the Regulator is required to undertake appropriate periodic inspections of regulated facilities. Inspections will be undertaken in accordance with the LA-IPPC risk method risk assessment and following on from any complaints or applications.

Procedures and records shall be examined during inspections and will be referred to during the DEFRA annual risk rating of the permitted site. The site will be determined as either a LOW, MEDIUM or HIGH risk. This will determine the annual subsistence fee and the frequency of inspection.

Annual subsistence fee

An annual subsistence fee is payable to operate the permitted installation. An invoice will be issued annually. Failure to pay the subsistence fee may result in a late payment fee and/or revocation of the permit. You are reminded that the operation of an installation without a permit is an offence upon summary conviction to a fine and/or imprisonment.

Responsibility under other statutory requirements.

This permit is given in relation to the requirements of the Environmental Permitting (England and Wales) Regulations 2016 (as amended). It must not be taken to replace any responsibilities you may have under workplace health and safety legislation. Neither does it detract from any statutory requirement such as the need to obtain Planning Permission and/or building Regulations approval.

For the prevention of accidents, the methods employed and the equipment used to ensure the correct handling, storage and use of flammable materials needs to be determined by trained personnel in accordance with HSE guidance and the Dangerous Substances and Explosive Atmosphere Regulations (DSEAR).

The storage, handling and use of flammable materials should be in accordance with HSE requirements, in order to prevent accidents that may have environmental consequences.

Appeals

The Operator can appeal against regulatory action by the regulator to the Secretary of State for Environment, Food & Rural Affairs. Appeals must be made in accordance with Regulation 31 and sent to the Secretary of State for Environment Food and Rural Affairs. The appeal form can be found at:

http://www.planning-inspectorate.gov.uk/pins/environment/environmental_appeals/environmental_permitting_appeal_form.pdf

Guidance on the appeal procedure can be found at:

http://www.planning-inspectorate.gov.uk/pins/environment/environmental_appeals/environmental_permitting_guidance_notes.pdf

There are time limits for making an appeal as follows:

- a) in relation to an appeal against a revocation notice, before the notice takes effect;
- b) in relation to the withdrawal of a duly-made application under paragraph 4(2) of Schedule 5, not later than 15 working days from the date of the notice served under that paragraph;
- c) in relation to a variation notification, a suspension notice, an enforcement notice or a landfill closure notice, not later than 2 months from the date of the notification or notice;
- d) in any other case not later than 6 months from the date of the decision or deemed decision.

Please note:

An appeal brought under Regulation 32(2)(b) and Schedule 6, in relation to the conditions of a permit 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 other conditions not subject to the appeal and direct the local authority either to vary any of these, or other conditions, or add new ones.

Review of Conditions

Under the Regulations the legislation requires permits to be 'reviewed' periodically but does not specify the frequency. It is considered that a frequency of once every eight years shall be adequate. Where significant pollution is encountered or where there are changes to BAT, or where the operational safety of the activity requires other techniques to be used, an immediate review shall be undertaken.

Variation of the permit or part of the permit

If the operator proposes to make a change in the operation of the installation, they must, at least 14 days before making the change, notify the regulator on the appropriate form. The notification must contain a description of the proposed change in operation. A 'change in operation' means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.

The operator may be liable to prosecution if they operate otherwise than in accordance with the conditions and plant described in this permit.

Transfer of the permit or part of the permit

Before the permit can be wholly or partially transferred to another person, an application to transfer the permit has to be made jointly by the existing and proposed operators. A transfer will be allowed unless the regulator considers the proposed

operator will not be the person who will have control over the operation of the installation, or will not comply with the conditions of the transferred permit.

Surrender of the permit or part of the permit

Where the operator intends to cease the operation of an installation (in whole or in part). For A2 permits, the Operator must apply for a surrender, using the appropriate form and in accordance with Regulation 25 and part 1 of Schedule 5 of the Regulations.

Offences

Offences under Regulation 38 of the Regulations are:

- (1) It is an offence for a person to—
 - (a) contravene regulation 12(1), or
 - (b) knowingly cause or knowingly permit the contravention of regulation 12(1)(a).
- (2) It is an offence for a person to fail to comply with or to contravene an environmental permit condition.
- (3) It is an offence for a person to fail to comply with the requirements of an enforcement notice or of a prohibition notice, suspension notice, landfill closure notice, mining waste facility closure notice, flood risk activity emergency works notice or flood risk activity remediation notice.
- (4) It is an offence for a person—
 - (a) to fail to comply with a notice under regulation 61(1) requiring the provision of information, without reasonable excuse;
 - (b) to make a statement which the person knows to be false or misleading in a material particular, or recklessly to make a statement which is false or misleading in a material particular, where the statement is made—
 - (i) in purported compliance with a requirement to provide information imposed by or under a provision of these Regulations,
 - (ii) for the purpose of obtaining the grant of an environmental permit to any person, or the variation, transfer in whole or in part, or surrender in whole or in part of an environmental permit, or
 - (iii) for the purpose of obtaining, renewing or amending the registration of an exempt facility;
 - (c) intentionally to make a false entry in a record required to be kept under an environmental permit condition;
 - (d) with intent to deceive—
 - (i) to forge or use a document issued or authorised to be issued or required for any purpose under an environmental permit condition, or
 - (ii) to make or have in the person's possession a document so closely resembling such a document as to be likely to deceive.
- (5) It is an offence for an establishment or undertaking to—
 - (a) fail to comply with paragraph 17(3) or (4) of Schedule 2, or
 - (b) intentionally make a false entry in a record required to be kept under that paragraph.
- (6) If an offence committed by a person under this regulation is due to the act or default of some other person, that other person is also guilty of the offence and liable

to be proceeded against and punished accordingly, whether or not proceedings for the offence are taken against the first mentioned person.

Penalties and enforcement undertakings

Penalties under Regulation 39 of the Regulations are:

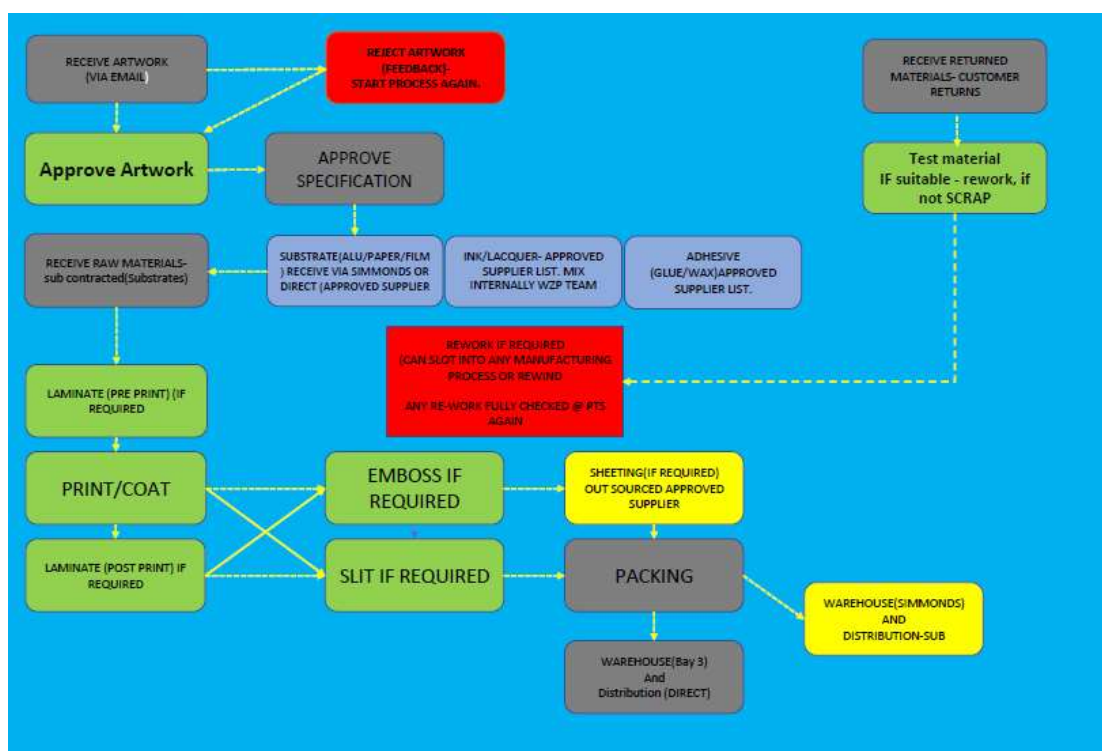
- (1) Subject to paragraph (2), a person guilty of an offence under regulation 38(1), (2) or (3) is liable—
 - (a) on summary conviction to a fine or imprisonment for a term not exceeding 12 months, or to both;
 - (b) on conviction on indictment to a fine or imprisonment for a term not exceeding 5 years, or to both.
- (2) A person guilty of offence under regulation 38(1), (2) or (3) in respect of a flood risk activity is liable—
 - (a) on summary conviction to a fine or imprisonment for a term not exceeding 12 months, or to both
 - (b) on conviction on indictment to a fine or imprisonment for a term not exceeding 2 years, or both.
- (3) In relation to an offence committed before the commencement of section 154(1) of the Criminal Justice Act 2003(a), paragraphs (1)(a) and (2)(a) have effect as if for “12 months” there were substituted “6 months”.
- (4) A person guilty of an offence under regulation 38(4) is liable—
 - (a) on summary conviction to a fine;
 - (b) on conviction on indictment to a fine or imprisonment for a term not exceeding 2 years, or to both.
- (5) An establishment or undertaking guilty of an offence under regulation 38(5) is liable on summary conviction to a fine not exceeding level 2 on the standard scale.
- (6) Schedule 26 (enforcement undertakings) has effect.

Status Log

Detail	Dates
Date Permit First Issued	21 January 2020
Partial surrender - installation boundary reduced	

Description of Permitted Activity

The installation produces flexible packaging for the commercial sector. It produces approximately 1000-2000 tonnes of converted aluminium and/or aluminium/paper based packaging materials. Below is a process flow diagram of the activity.



End of Introductory Note

Permit Conditions

Permitted Activities

1. WZ Packaging Ltd (known herein as the Operator) is permitted to operate an activity for surface treating substances, objects or products using organic solvents in plant with a consumption capacity of more than 150kg or more per hour than 200 tonnes per year, within the boundary outlined in blue as detailed in the installation map of Appendix 1.
2. The Operator shall only carry out the permitted activities and directly associated activities described in Table 1 within the installation.

Table 1 – Permitted activities		
Activities listed in Environmental Permitting (England and Wales) Regulations 2016	Description of specified activity	Limits of specified activity
<p>surface treating substances, objects or products using organic solvents in plant with a consumption capacity of more than 150kg or more per hour than 200 tonnes per year as described Schedule 1, Part 2, Section 6.4(A2)(a),</p> <p>Schedule 14 Activity – Printing: Any reproduction activity of text and/or images in which, with the use of an image carrier, ink is transferred onto whatever type of surface. It includes associated varnishing, coating and laminating techniques</p>	<p>The lamination, coating and printing on aluminium foil packaging using liquid inks containing organic solvents within plant and equipment designed for that purpose. The organic solvent use is more than 25 tonnes per annum</p>	<p>This includes treating, handling, mixing and use of organic solvents for the purpose of coating, printing and finishing of foil packaging materials at the installation. Also the cleaning of plant and equipment using organic solvents.</p>
Directly associated activities		
The delivery, storage and handling of materials	All materials related to the specified activity.	From receipt of raw materials, the handling of materials, through to the handling, storage and disposal of waste materials.
Cleaning of plant and equipment	The cleaning off-line of equipment	The cleaning and drying of equipment within specified plant using VOCs as cleaning materials.
Finishing	Finishing, slitting and embossing of printed packaging	N/A

Plant and Equipment

3. Only the listed plant and equipment detailed in Table 2 shall be operated within the permitted installation.

Table 2 – Permitted plant and equipment
Haden Regenerative Thermal Oxidiser (RTO)
DCE Unimaster dust extractor connected to a DoimakRUA-3 2000 Core Cutter
Renzmen solvent washer
Rotomec printing machine 334
Cerutti printing machine 337
Tecmo 3 Stage printing/coating machine 364
Kroenert Reco 600 printing/coating machine 365
Halley Printing Machine 338
Kroenert Laminator/ printing Machine 339
Wax printing machine 341
Overground storage tank with three compartments
Mixing room: Rexson ink dispensing kit Renzmann wash plant Renzmann solvent distillation unit.

Permit Management

General Requirements

4. The best available techniques shall be used to prevent, or where that is not practicable, reduce the emissions from the installation in relation to any aspect of the activity which is not specifically regulated by any condition of this permit.
5. An appropriate person (and deputy) shall be appointed as the primary point of contact with the regulator. The regulator shall be informed in writing of the appointed person (and deputy). In the event of a different person being appointed, the regulator shall be informed without delay.
6. A copy of this permit shall be kept at the installation. All relevant staff shall be made aware of its content and shall be told where it is kept.

7. If the operator proposes to make a change in the operation of the installation, they must, at least 14 days before making the change, notify the regulator on the appropriate form. The notification must contain a description of the proposed change in operation. A 'change in operation' means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.
8. The Operator shall notify the Regulator in writing and within 14 days of their occurrence if they make:
 - a. Any change to the installation name, registered company name or company registered address.
 - b. A change to any particulars of the holding company (including details of any ultimate holding company where the Operator has become a subsidiary).
9. The Operator must respond to any Request for Information Notice served for the purposes of complying with their obligation to report their pollutant releases and off-site waste transfers pursuant to the directly applicable EU duty in accordance with Article 5 of EC Regulation No 166/2006 concerning the establishment of a European Pollutant Release and Transfer Register (E-PRTR). Failure to respond in accordance with such annual E-PRTR request for information notice will hereby constitute a breach of this permit condition.

Records

10. All records required to demonstrate compliance with any conditions of this Permit shall be kept in an organised manner. The records shall be kept electronically or in paper form. Records:
 - a) Must be legible and any amendment entered into a record shall be made in such a way as to leave the original clear and legible. A valid reason for such an amendment shall be included.
 - b) Records shall be kept for a period of 5 years, unless otherwise stated.
 - c) Records shall be kept on-site for a minimum of 12 months and made available for inspection by the Regulator. Records kept off-site, must be made available within 7 days of any request by the Regulator.
11. All documentation required to be submitted to the regulator to demonstrate compliance with relevant conditions, shall be submitted in an electronic format and include the permit number and the Operator name. Submissions shall be sent to: environmental.health@telford.gov.uk

Written Environmental Management Systems

12. The regulated activity shall be managed and operated in accordance with a written environmental management system.

- 13.** The environmental management system required in condition 12 shall include:
- c. Operational procedures
 - d. Delivery procedures
 - e. A list of plant and equipment concerned with the control of pollution
 - f. Planned preventative maintenance procedures.
 - g. Training procedures
 - h. Pollution control and incident management procedures.
 - i. Accidents/ incidents/ non-conformance.
- 14.** The environmental management system procedures shall include systems and procedures setting out the necessary steps to be taken;
- j. To ensure that all staff engaged in carrying out operations at the permitted installation, are provided with adequate professional and technical development and training, and written operating instructions to enable them to carry on their duties. This shall include the maintenance of a record of the skills and training requirement for each job, and of all relevant training undertaken by staff.
 - k. To monitor the condition of, and to maintain the permitted installation, included as a minimum; plant, equipment, instrumentation, building, drains, abatement plant, storage of chemicals and building structures which it relies on for the prevention, or limitation, of pollution from the permitted installation.
 - l. To carry out effective maintenance and servicing on all aspects of the installation whose failure has the potential to impact on the environment.
 - m. To investigate and rectify any non-compliance with the conditions of this permit, and/or any incident or pollution identified by the Operator or drawn to the attention of the Regulator, or by complaint by another person.
 - n. In the event of an incident, leak, malfunction, momentary stoppage or other defect of the installation.
- 15.** The odour control programme submitted with the permit application shall be included into the environmental management system.
- 16.** The environmental management system required by condition 12 shall be reviewed and updated:
- a. Prior to the completion of a significant change within the installation.
 - b. Where any type of change is made to any plant and equipment listed within Table 2.
 - c. At least every 2 years in any other circumstance.
- 17.** Any review required by condition 16 shall be recorded, the results incorporated into the environmental management system and implemented within 3 months from the end of the review.

Emission Limits

- 18.** The use of materials containing isocyanates shall not be permitted.

19. The emission limits, provisions, methods and frequency set out in Table 3 shall be complied with. The reference conditions of substances in releases to air from point sources shall be: temperature 273.15 K (0°C), pressure 101.3 kPa (1 atmosphere), measured wet, no correction for water vapour.

Table 3 - Emission Limits and monitoring frequency			
Row	Substance and emission point to be tested	Emission Limit	Monitoring frequency
1	Particulate Matter from all stacks and E.B emission points listed in Appendix 2 - stack and emergency bypass map	No visible emissions	Recorded visual assessments at start up and shut down of the RTO, and at least once a day during normal operation of the RTO
2	Oxides of Nitrogen from stack number 1 listed in Appendix 2	100mg/m ³	Annual extractive monitoring
3	Carbon Monoxide from stack number 1 listed in Appendix 2	100 mg/m ³	Annual extractive monitoring.
5	Hydrogen Chloride from stack number stack number 1 listed in Appendix 2	10mg/m ³	Annual extractive monitoring
6	Hydrogen Fluoride from stack number stack number 1 listed in Appendix 2	5mg/m ³	Annual extractive monitoring
7	Temperature from RTO	800°C	Continual recorded monitoring
Schedule 14 Solvent emissions requirements			
8	VOC stack number 1, 2, 3, 4, 5 and 6 listed in Appendix 2	100mg/m ³	Annual extractive monitoring
11	VOC Fugitive emission value	20% of solvent input	Annual submission of the solvent management plan

Monitoring

20. The monitoring of emissions listed in Table 3 shall be carried out at the frequency specified in the Table.
21. MCERTS (monitoring certification scheme, environment agency) standards shall be applicable to all extractive monitoring requirements. Monitoring shall be undertaken by MCERTS and/or UKAS accredited personnel.

- 22.** Emission monitoring shall be carried out in accordance with the methods described in the latest versions of M1 and M2 published by the Environment Agency. Sampling analytical methods shall be the most up to date relevant British (BS) or International Standard (ISO).
- 23.** At least 14 days before any annual monitoring exercise is undertaken, the operator shall inform the regulator of the following
 - a. The date on which the monitoring is due to commence.
 - b. The sampling monitoring protocol or strategy which shall include the substances to be tested, the methods and procedures.
- 24.** The results of all extractive monitoring shall be submitted to the regulator within 8 weeks of the monitoring being taken.
- 25.** The operator shall inform the regulator without delay of any monitoring results that exceed the emission limit value from any monitoring activity. The operator shall investigate the exceedance and take corrective action. Relevant emissions shall be re-sampled and the results of the investigation, actions and sampling shall be forwarded to the regulator.
- 26.** The temperature and carbon monoxide requirements in Table 3 shall be continually monitored.
- 27.** Continual monitors for the RTO shall be fitted with audible and visual alarms situated appropriately to warn the operator of the RTO failure or malfunction. The activation of the alarm shall be automatically recorded and readings shall be on display to appropriately trained staff.
- 28.** All continuous monitors shall be serviced and calibrated annually. A record shall be made available for inspection by the regulator.

Solvent management plan

29. The operator shall forward to the regulator no later than 31 January of each year, a solvent management plan, which demonstrates for the previous 12 months, the fugitive emission value in Table 3. The following calculations shall be used which are defined in Appendix 3;

- a. The solvent purchased (I_1), in kilograms.
- b. The solvent recovered and reused in the activity (I_2), in kilograms.
- c. The amount of solvents in waste gases (O_1), in kilograms.
- d. The amount of solvent from waste gases when the emergency bypass is in operation (O_1), in kilograms.
- e. The figure derived from c and d shall be added together to give an overall amount of O_1 , in kilograms.
- f. The amount of solvents destroyed by thermal oxidation and water treatment (O_5), in kilograms.
- g. The amount of solvents in waste wipes, and empty drums (O_6), in kilograms.
- h. The amount of solvents contained in mixtures sold as a commercially viable product, (O_7), in kilograms.
- i. The amount of solvent sent for recycling (O_8), in kilograms.
- j. The solvent consumption for the previous 12 months. The solvent consumption shall be calculated using the equation $C = I_1 - O_8$.
- k. Compliance with the fugitive emission value in Table 3 using the following equations:

- i. $F = I_1 - O_1 - O_5 - O_6 - O_7 - O_8$

- ii. Fugitive emission value = $\frac{F}{I_1 + I_2} \times 100\%$

30. Detailed evidence used in the calculations to demonstrate condition 29 above shall be included.

31. The Operator shall include in the solvent management plan:

- a. A 12 month inventory detailing the type and quantity of raw materials used.
- b. An annual review of low solvent alternatives for the raw materials used.

32. Cleaning operations shall be reviewed annually to identify cleaning steps that can be eliminated. The review shall also include low solvent or non-solvent methods trialled or introduced over the previous 12 months. The results of this review shall be reported within the solvent management plan.

33. Solvent free gluing systems shall be used where technically possible. Where this is not possible, solvent based glues shall be reviewed annually and the results reported within the solvent management plan.

Designated Materials

34. The operator shall maintain a register of all raw materials containing solvent and their designated hazard statement. The register shall be made available for inspection by the regulator.
35. Materials with the designated hazard statements H340, H341 H350, H350i, H351, H360d or H360F shall not be permitted.

Waste audit

36. The operator shall produce and maintain an annual inventory of all waste removed from the site.

Energy audit

37. The operator shall produce a report annually on the energy consumption of the installation.

Resource Utilisation

38. At least every 4 years, a systematic assessment of the raw materials, electrical and gas consumption, emissions and waste production associated with the installation shall be undertaken. The purpose of the assessment shall be to identify methods of reducing raw materials, energy and fuel consumption, emissions and waste production, including the identification of methods of avoiding or reducing the impact on the environment from the disposal of waste. Each assessment shall be recorded and submitted to the council. The first assessment results shall be submitted to the regulator no later than 12 months from the date of issue of this permit.

Soil and groundwater monitoring

39. From the date of issue of the Permit, periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.
40. Any periodic testing method shall be submitted to the regulator for approval at least 28 days before the proposed monitoring is carried out.

Operational Controls***General***

41. For small quantities of coatings, programmable scales shall be used during the mixing and preparation.
42. All other mixing of solvent based materials, this shall be controlled by the onsite computer system.

- 43. Suitable solvent containment and spillage equipment shall be readily available in all solvent handling areas.
- 44. All spillages shall be cleared without delay.
- 45. The operator shall ensure that all operational and storage areas are equipped with an impervious surface, spill containment kerbs, sealed construction joints, and connected to a sealed drainage system or such alternative requirements as approved by the regulator.
- 46. A high standard of housekeeping shall be maintained.

Storage and delivery of materials

- 47. Storage of materials containing VOCs shall only be stored within closed containers within the chemical storage unit and/ or the mixing room. The chemical storage unit shall be bunded.
- 48. Dusty or potentially dusty materials shall be stored within the installation in closed containers.
- 49. All sumps shall be impermeable and resistant to stored materials.
- 50. All solvent storage bund volumes shall be more than 110% of the materials stored upon it.
- 51. The operator shall ensure that deliveries are carried out in such a way so as to minimise noise, spillage, leaks and dusty or VOC emissions.
- 52. 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.
- 53. External storage of materials shall be within a bunded area, with a hard impervious surface.
- 54. 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 shall be sited in such a way as to prevent the arising of offensive odour beyond the site boundary.
- 55. Bulk storage tanks for solvent storage shall be light coloured, in order to reduce thermal increase as a resulting from sunlight.
- 56. Delivery connections to bulk storage tanks shall be located within a bunded/contained area, fixed and locked when not in use.

57. Storage tanks shall be fitted with high-level alarms or volume indicators to warn of overfilling and where practicable the filling system shall be interlocked to the alarm system to prevent overfilling.
58. Deliveries to bulk storage tanks shall be supervised by trained personnel to avoid potential accidents and spillage.
59. Solvent containing materials shall be stored in closed storage containers.
60. The tank, bunds and sumps shall be subject to regular visual inspection, as agreed with the regulator, and placed on a preventative maintenance programme. The contents of bunds and sumps shall be pumped out or otherwise removed as soon as is practicable after checking for contamination.

Cleaning

61. Residual inks and coating materials contained in parts of the press shall be removed prior to cleaning.
62. Off-line cleaning shall be carried out using an enclosed cleaning system.
63. Application of cleaning solvent shall be:
- a. From a contained device or automatic system when applied directly onto machine rollers.
 - b. Dispensed by a piston type dispenser or similar contained device, when used on wipes.
64. Pre-impregnated wipes shall be held within a closed container prior to use.
65. Self-closing bins shall be used for solvent contaminated waste.
66. Where water-borne materials are used in the activity, the operator shall:
- a. Remove for re-use residual water-borne product prior to cleaning.
 - b. Rinse the equipment with the minimum amount of water.
 - c. Treat the cleaning water as waste material

Solvent recovery

67. Where technically possible, returned ink shall be kept and re-used.
68. Waste solvent materials from the activity shall be recovered on site for their solvent content. Recovered solvent shall be re-used within the activity.

Waste handling

69. Waste storage areas shall be clearly marked. All containers shall be clearly labelled with the contents and the date placed into the waste area.
70. Waste materials shall be kept within closed containers, labelled with the contents and date stored. They must be kept within a bunded area.

71. Empty solvent waste containers and containers holding solvent waste materials, shall be stored within a bunded area, with lids, caps and valves secured in place.
72. Waste solvent shall be stored for a maximum period of six months.

Soil and groundwater protection

73. There shall be no unauthorised emissions to soil, groundwater or the sewer system.
74. Plans shall be maintained that identify the configuration and specification of all drains, sumps and subsurface pipe-work within appendix 4.
75. The Operator shall investigate and identify the potential risk to the environment from the drainage systems. The findings shall be submitted to the regulator.
76. A record shall be maintained of any incident that has, or might have, impacted on the condition of any soil or groundwater during the lifetime of the permit. This includes any incidents, or as a result of an accumulation of incidents, together with a record of further investigation or remediation work carried out. These records shall be preserved until the permit is surrendered.
77. The operator shall have the surface drainage system and sumps inspected no less than once every five years. The results of the inspection shall be made available for inspection. The test shall include the results of any pressure tests, leak tests, material thickness checks, or CCTV survey. The first test shall be no later than 31 March 2025.

Emissions

78. All reasonable steps shall be taken to minimise visible emissions from the RTO during start up and shut down. These steps shall be detailed within the environmental management system.
79. All other releases to air, from all exit points listed in Appendix 2, other than condensed water vapour, shall be free from persistent visible emissions.
80. Where persistent visible emissions are found, investigate the cause and report to the regulator immediately.
81. All operational plant and equipment that utilises solvent containing materials shall have emissions to air contained and extracted to the RTO.
82. No emissions of solvents shall be extracted to the unabated stacks or LEV listed in Appendix 2 Emission stacks and LEV Map.

83. The RTO shall be in operation when the installation is in operation. Where there is a failure or breakdown of the RTO, then the installation shall not operate until the RTO is fully functional.
84. The emergency bypass system for the RTO shall only be used in an emergency. Where the emergency bypass system is operated, this shall be recorded, including the date, time, duration and the reason for the activation. The regulator shall be informed of all activations in excess of 15 minutes.
85. Emissions of ozone shall be captured and vented under suitable conditions to provide adequate dispersion.

Incidents

86. There shall be written procedures in the form of an incident management plan for investigating incidents and near misses, including identifying suitable corrective action and any follow up.
87. The incident management plan shall be reviewed and updated every 4 years.
88. All Incidents, accidents and abnormal emissions, shall be investigated immediately and remedial action taken as soon as practicable. The operator shall also:
- a. Promptly record the events and actions taken
 - b. Ensure the regulator is informed without delay.
89. The operator shall notify the regulator without delay, any incident or non-compliance of a condition of this permit that has or is likely to have a significant effect on the environment including air, soil and groundwater.

Imminent danger

90. In the event where an incident and/or a breach of any condition of the permit poses an immediate danger to human health, or threatens to cause an immediate significant adverse effect on the environment, operation of the permitted installation or relevant part thereof, shall be immediately suspended until such time as it can be operated in compliance with the conditions of the permit.

Noise and vibration

91. The regulated activity shall be free from noise and vibration that are likely to cause nuisance as perceived by the Regulator.
92. Where it has been found by the Regulator that activities are causing noise and vibration beyond the installation boundary as perceived by the Regulator, the Operator shall:
- a. Submit for approval a noise and vibration management plan which includes an appropriate noise or vibration assessment based on current Standards, within a timeframe specified by the Regulator.

- b. Implement the approved noise and vibration management plan within a timeframe specified by the regulator.

93. Where a significant change to the installation is proposed, a noise and vibration assessment shall be undertaken and submitted to the Regulator prior to the completion of the significant change. The purpose of the assessment shall be to identify the potential noise and vibration impact and detail methods of reducing the identified noise and vibration emissions where required.

Odour

94. The operator shall carry out a daily odour assessment to determine if emissions result in odours beyond the installation boundary.

95. Where offensive odour is identified, the operators shall implement their odour control programme.

96. All emissions to air from the installation shall be free from offensive odour beyond the installation boundary identified in the site map detailed in Appendix 1, as perceived by the Regulator.

Cessation of Activities

97. The operator shall maintain a site closure plan for the final cessation of the activities. The site closure plan shall include:

- a. Site details; and
- b. Details of the condition of the land at permit issue (baseline report); and
- c. Details of the permitted activities; and
- d. Outline proposals for decommissioning.

98. The site closure plan detailed in condition 97 shall be kept updated as changes occur to the installation and its activities. Once updated, the Regulator shall be provided with an amended copy of the site closure plan within 8 weeks of the completed changes.

99. The baseline report shall contain the information necessary to determine the state of the soil and groundwater contamination so as to make a quantified comparison with the state on final cessation. The baseline report shall be updated where;

- a. Changes to the activity or the installation boundary are made; and
- b. Measures are taken to protect land; and
- c. Pollution incidents that may have had an impact on land, and their remediation; and
- d. Details of soil, gas and water quality monitoring.

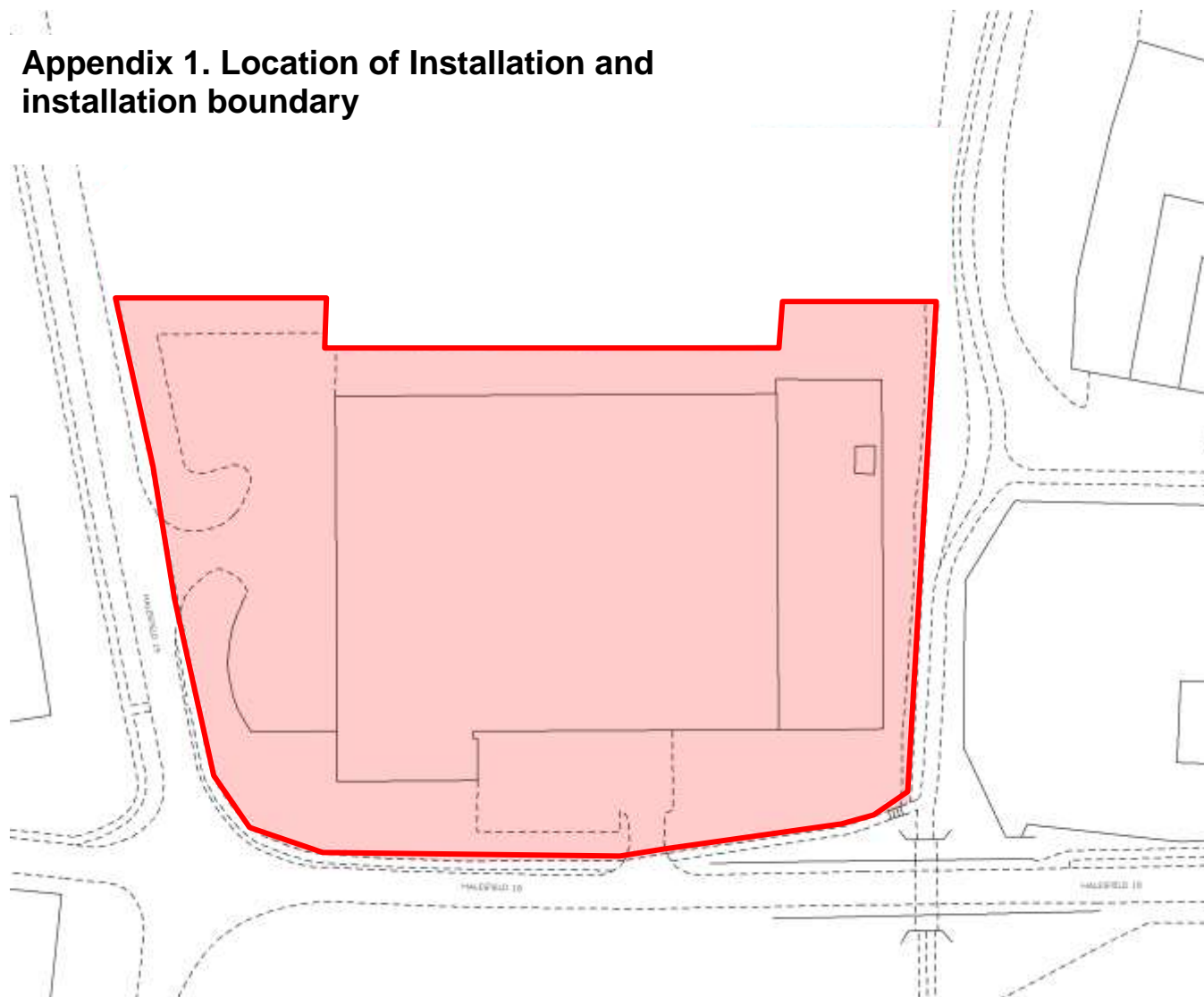
100. Upon final cessation of the permitted activities, the operator shall assess the state of the soil and groundwater contamination by relevant hazardous substances used, produced or released by the installation. Where the installation has caused significant pollution of soil and groundwater by relevant hazardous

substances compared to the state established in the baseline report, the operator shall take the necessary measures to address the pollution so as to return the site to that state.

Upgrade Plan

- 101.** Within 3 months from the date of issue of the permit, the operator shall submit for approval the Environmental Management System required by Conditions 12 to 15 inclusive of this permit.
- 102.** Within 3 months from the date of issue of the permit, the operator shall submit for approval a plan to gather baseline data. The plan shall establish a suitable site investigation and analytical strategy that will produce baseline data for the site. The approved plan shall be implemented no later than 3 months from the date of approval. The plan shall be submitted at least 28 days before the commencement of the monitoring exercise.
- 103.** Within 3 months from the date of issue of the permit, the operator shall submit a clear diagrammatic record of the routing of all installation drains (both foul and surface drains), subsurface pipework, sumps, and storage vessels. The operator shall include an assessment to identify the potential risk to the environment from the drainage systems detailed in the drainage systems.
- 104.** Within 6 months from the date of issue of the permit, the operator shall submit an assessment of all the internal and external surfaces of the installation with an action plan to repair aforementioned surfaces.
- 105.** Where stacks to be monitored for VOC emissions listed in row 8 of Table 3 do not meet the emission limit stated in the table, then abatement shall be required to meet the emission limit within 6 months from the date of monitoring.

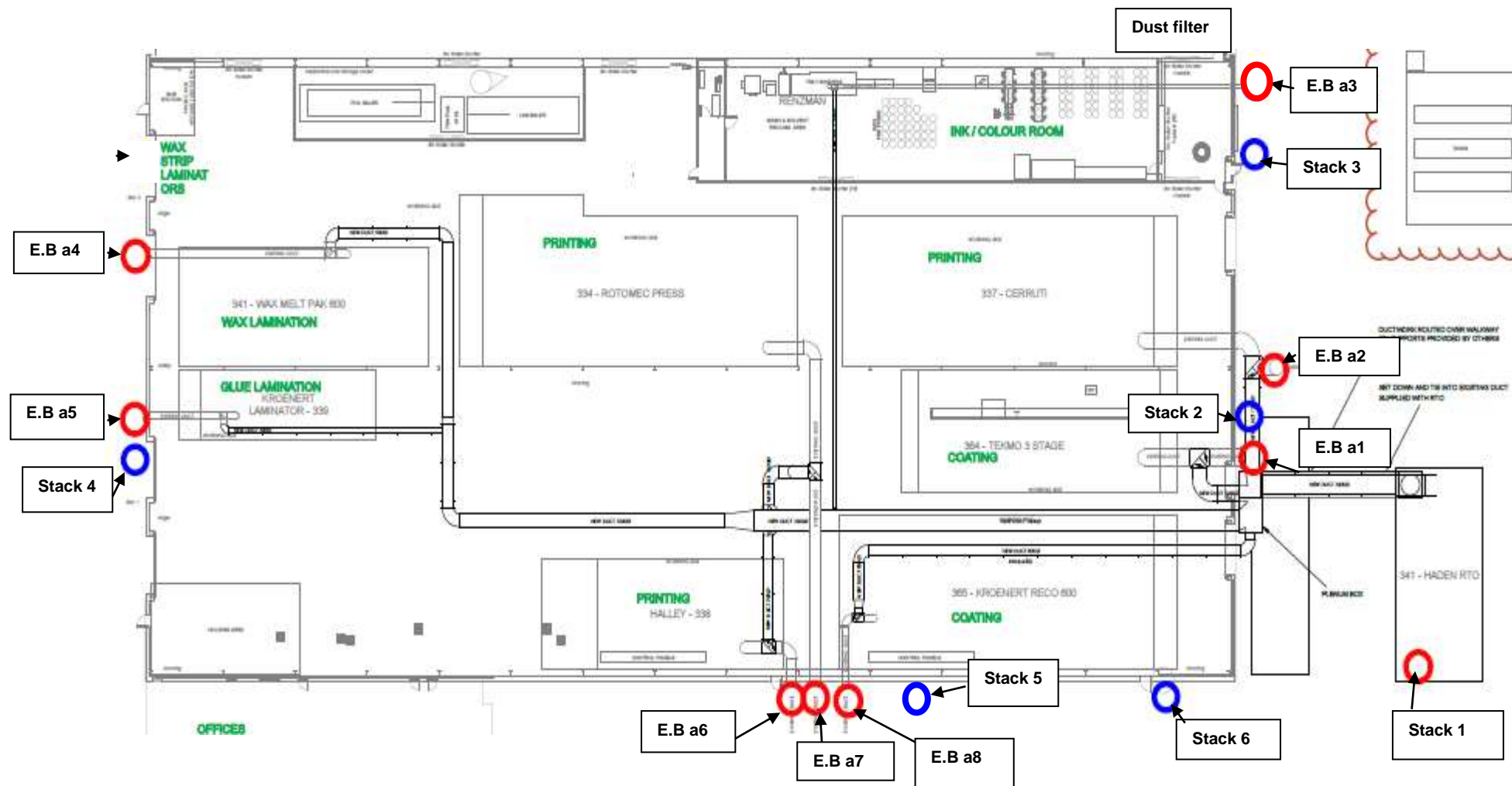
Appendix 1. Location of Installation and installation boundary



The floor plan is divided into several functional areas:

- FINISHING DEPARTMENT (SLITTING, EMBOSSED, PACKING):** Located in the upper left, containing multiple slitting machines (e.g., 1100-1, 1100-2, 1100-3, 1100-4, 1100-5, 1100-6, 1100-7, 1100-8, 1100-9, 1100-10, 1100-11, 1100-12, 1100-13, 1100-14, 1100-15, 1100-16, 1100-17, 1100-18, 1100-19, 1100-20, 1100-21, 1100-22, 1100-23, 1100-24, 1100-25, 1100-26, 1100-27, 1100-28, 1100-29, 1100-30, 1100-31, 1100-32, 1100-33, 1100-34, 1100-35, 1100-36, 1100-37, 1100-38, 1100-39, 1100-40, 1100-41, 1100-42, 1100-43, 1100-44, 1100-45, 1100-46, 1100-47, 1100-48, 1100-49, 1100-50, 1100-51, 1100-52, 1100-53, 1100-54, 1100-55, 1100-56, 1100-57, 1100-58, 1100-59, 1100-60, 1100-61, 1100-62, 1100-63, 1100-64, 1100-65, 1100-66, 1100-67, 1100-68, 1100-69, 1100-70, 1100-71, 1100-72, 1100-73, 1100-74, 1100-75, 1100-76, 1100-77, 1100-78, 1100-79, 1100-80, 1100-81, 1100-82, 1100-83, 1100-84, 1100-85, 1100-86, 1100-87, 1100-88, 1100-89, 1100-90, 1100-91, 1100-92, 1100-93, 1100-94, 1100-95, 1100-96, 1100-97, 1100-98, 1100-99, 1100-100, 1100-101, 1100-102, 1100-103, 1100-104, 1100-105, 1100-106, 1100-107, 1100-108, 1100-109, 1100-110, 1100-111, 1100-112, 1100-113, 1100-114, 1100-115, 1100-116, 1100-117, 1100-118, 1100-119, 1100-120, 1100-121, 1100-122, 1100-123, 1100-124, 1100-125, 1100-126, 1100-127, 1100-128, 1100-129, 1100-130, 1100-131, 1100-132, 1100-133, 1100-134, 1100-135, 1100-136, 1100-137, 1100-138, 1100-139, 1100-140, 1100-141, 1100-142, 1100-143, 1100-144, 1100-145, 1100-146, 1100-147, 1100-148, 1100-149, 1100-150, 1100-151, 1100-152, 1100-153, 1100-154, 1100-155, 1100-156, 1100-157, 1100-158, 1100-159, 1100-160, 1100-161, 1100-162, 1100-163, 1100-164, 1100-165, 1100-166, 1100-167, 1100-168, 1100-169, 1100-170, 1100-171, 1100-172, 1100-173, 1100-174, 1100-175, 1100-176, 1100-177, 1100-178, 1100-179, 1100-180, 1100-181, 1100-182, 1100-183, 1100-184, 1100-185, 1100-186, 1100-187, 1100-188, 1100-189, 1100-190, 1100-191, 1100-192, 1100-193, 1100-194, 1100-195, 1100-196, 1100-197, 1100-198, 1100-199, 1100-200, 1100-201, 1100-202, 1100-203, 1100-204, 1100-205, 1100-206, 1100-207, 1100-208, 1100-209, 1100-210, 1100-211, 1100-212, 1100-213, 1100-214, 1100-215, 1100-216, 1100-217, 1100-218, 1100-219, 1100-220, 1100-221, 1100-222, 1100-223, 1100-224, 1100-225, 1100-226, 1100-227, 1100-228, 1100-229, 1100-230, 1100-231, 1100-232, 1100-233, 1100-234, 1100-235, 1100-236, 1100-237, 1100-238, 1100-239, 1100-240, 1100-241, 1100-242, 1100-243, 1100-244, 1100-245, 1100-246, 1100-247, 1100-248, 1100-249, 1100-250, 1100-251, 1100-252, 1100-253, 1100-254, 1100-255, 1100-256, 1100-257, 1100-258, 1100-259, 1100-260, 1100-261, 1100-262, 1100-263, 1100-264, 1100-265, 1100-266, 1100-267, 1100-268, 1100-269, 1100-270, 1100-271, 1100-272, 1100-273, 1100-274, 1100-275, 1100-276, 1100-277, 1100-278, 1100-279, 1100-280, 1100-281, 1100-282, 1100-283, 1100-284, 1100-285, 1100-286, 1100-287, 1100-288, 1100-289, 1100-290, 1100-291, 1100-292, 1100-293, 1100-294, 1100-295, 1100-296, 1100-297, 1100-298, 1100-299, 1100-300, 1100-301, 1100-302, 1100-303, 1100-304, 1100-305, 1100-306, 1100-307, 1100-308, 1100-309, 1100-310, 1100-311, 1100-312, 1100-313, 1100-314, 1100-315, 1100-316, 1100-317, 1100-318, 1100-319, 1100-320, 1100-321, 1100-322, 1100-323, 1100-324, 1100-325, 1100-326, 1100-327, 1100-328, 1100-329, 1100-330, 1100-331, 1100-332, 1100-333, 1100-334, 1100-335, 1100-336, 1100-337, 1100-338, 1100-339, 1100-340, 1100-341, 1100-342, 1100-343, 1100-344, 1100-345, 1100-346, 1100-347, 1100-348, 1100-349, 1100-350, 1100-351, 1100-352, 1100-353, 1100-354, 1100-355, 1100-356, 1100-357, 1100-358, 1100-359, 1100-360, 1100-361, 1100-362, 1100-363, 1100-364, 1100-365, 1100-366, 1100-367, 1100-368, 1100-369, 1100-370, 1100-371, 1100-372, 1100-373, 1100-374, 1100-375, 1100-376, 1100-377, 1100-378, 1100-379, 1100-380, 1100-381, 1100-382, 1100-383, 1100-384, 1100-385, 1100-386, 1100-387, 1100-388, 1100-389, 1100-390, 1100-391, 1100-392, 1100-393, 1100-394, 1100-395, 1100-396, 1100-397, 1100-398, 1100-399, 1100-400, 1100-401, 1100-402, 1100-403, 1100-404, 1100-405, 1100-406, 1100-407, 1100-408, 1100-409, 1100-410, 1100-411, 1100-412, 1100-413

Appendix 2 cont: - Emission stacks and Emergency Bypass stacks (E.B) Map



Appendix 3 – solvent management plan definitions

I₁ The quantity of organic solvents or their quantity in mixtures purchased which are used as input into the process/activity (including organic solvents used in the cleaning of equipment, but not those used for the cleaning of the products).

I₂ The quantity of organic solvents or their quantity in mixtures recovered and reused as solvent input into the process/activity. (The recycled solvent is counted every time it is used to carry out the activity.)

O₁ Emissions in waste gases.

O₂ Organic solvents lost in water, if appropriate taking into account waste water treatment when calculating O₅.

O₃ The quantity of organic solvents which remains as contamination or residue in products output from the process/activity.

O₄ Uncaptured emissions of organic solvents to air. This includes the general ventilation of rooms, where air is released to the outside environment via windows, doors, vents and similar openings.

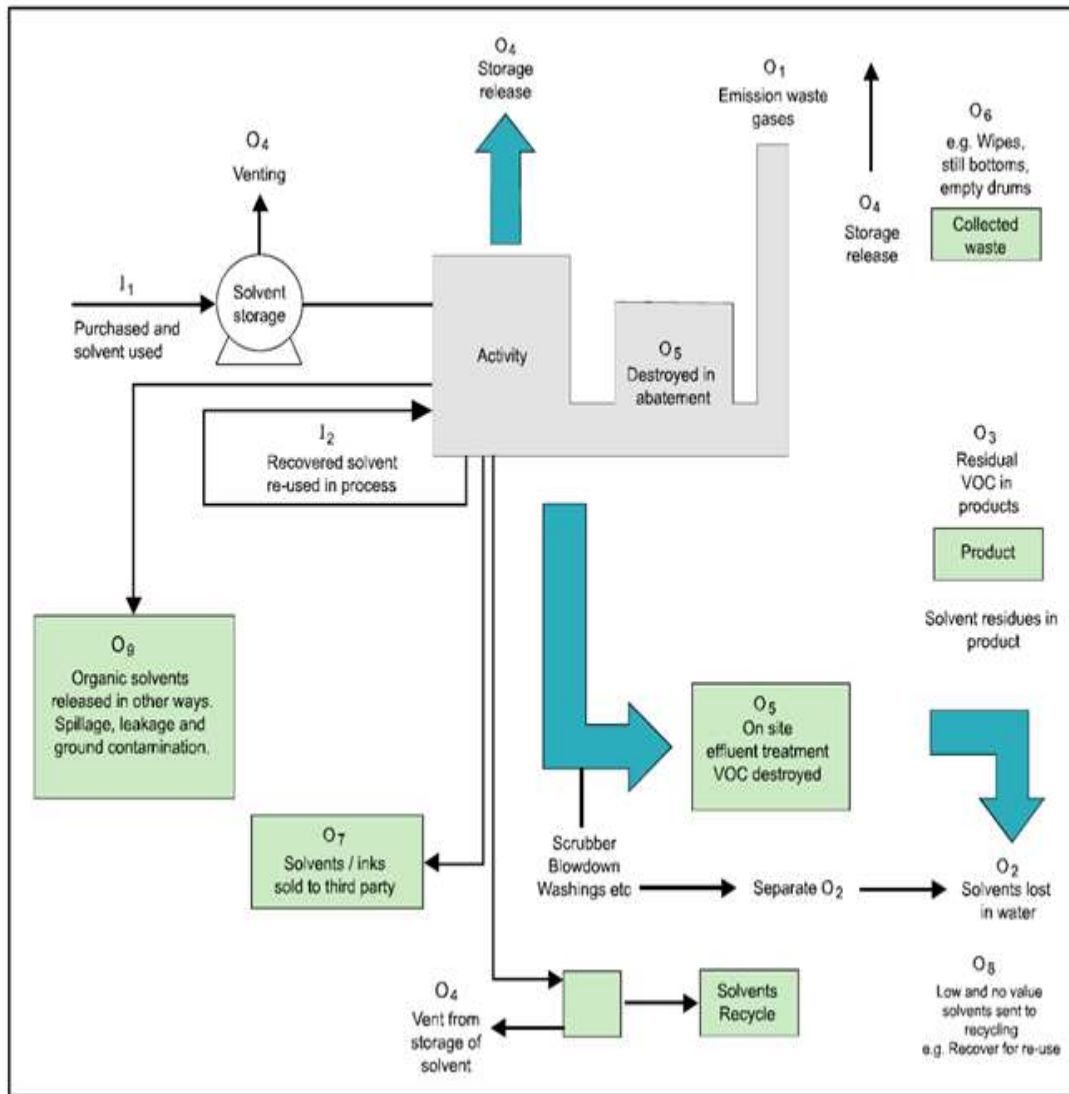
O₅ Organic solvents and/or organic compounds lost due to chemical or physical reactions (including for example those which are destroyed, e.g. by thermal oxidation or other waste gas or waste water treatments, or captured, e.g. by adsorption, as long as they are not counted under O₆, O₇ or O₈).

O₆ Organic solvents contained in collected waste.

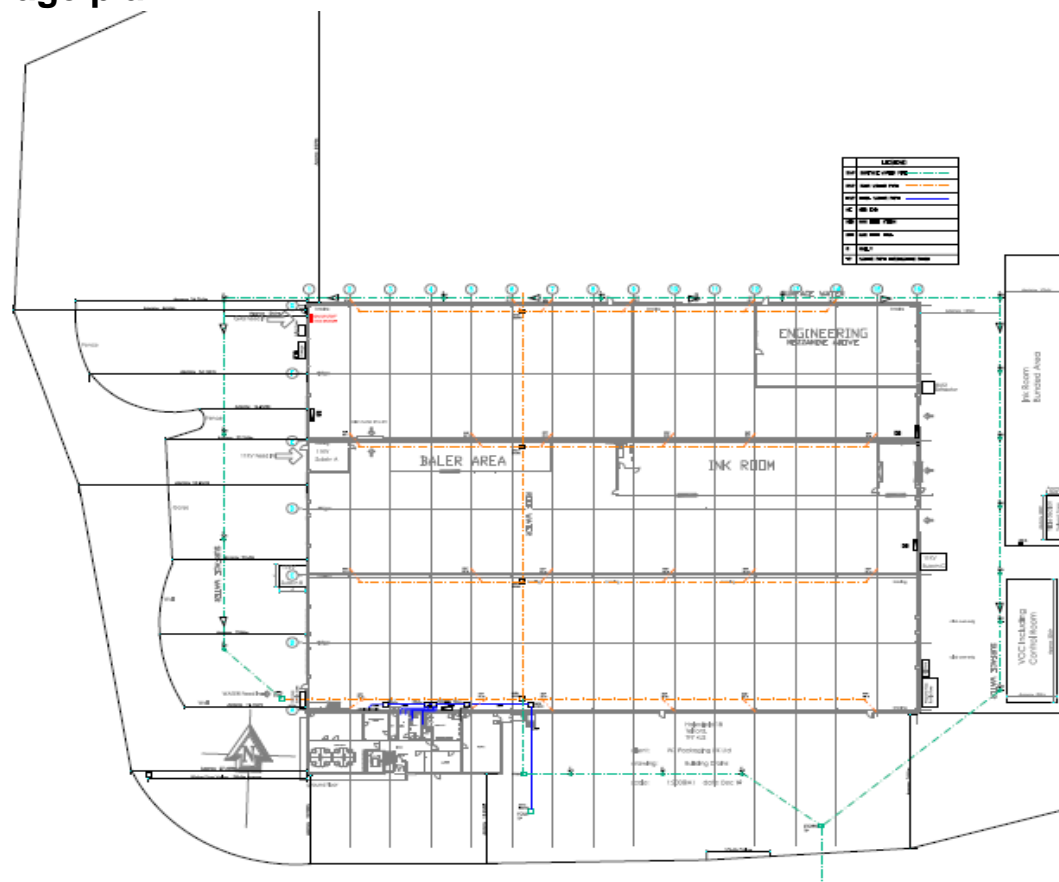
O₇ Organic solvents, or organic solvents contained in mixtures, which are sold or are intended to be sold as a commercially valuable product.

O₈ Organic solvents contained in mixtures recovered for reuse but not as input into the process/activity, as long as not counted under O₇.

O₉ Organic solvents released in other ways.



Appendix 4 – drainage plan



End of Permit Conditions

Interpretation of Terms

For the purposes of this Permit as its conditions, the following interpretation of terms shall apply:

BAT (Best Available Techniques)

means the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing in principle the basis for emission limit values designed to prevent, and where that is not practicable, generally to reduce emissions and the impact on the environment as a whole.

“best” shall mean most effective in achieving a high general level of protection if the environment as a whole.

“available” techniques shall mean those developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the costs and advantages, whether or not the techniques are used or produced inside the Member State in question, as long as they are reasonably accessible to the operator.

“techniques” includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

General Meanings

Any reference to a numbered condition, group of conditions, table, or appendix is a reference to the condition. Group of conditions, appendix, table bearing that number in this permit.

Except where specified otherwise in the permit:

Day means any period of 24 consecutive hours

Week means any period of 7 consecutive days.

Month means a calendar month

Year means any period of 12 consecutive months.

End of Permit