



Environmental Permitting (England and Wales) Regulations 2016

Variation Notice

To: Echo Packaging Ltd, Sondes Road, Willowbrook Industrial Estate, Corby,
Northamptonshire, NN17 5XL

Corby Borough Council ("the Council"), in the exercise of the powers conferred upon it by Regulation 20 of the Environmental Permitting Regulations 2016 (the Regulations) hereby gives you notice as follows:

The Council has decided to vary the conditions of Permit Reference Number 46 in respect of the operation of an installation at Sondes Road, Willowbrook Industrial Estate, Corby, Northamptonshire, NN17 5XL.

The variation of the conditions of the permit and the date on which they are to take effect are specified in [Schedule 1] to this notice. A consolidated permit as varied by this notice is set out in [Schedule 2].

Signed on behalf of Corby Borough Council

Date 24th August 2017

A handwritten signature in blue ink, appearing to be "A. P. G.", written over a horizontal line.

Environmental Protection and Private Sector Housing Manager
Authorised Officer of the Council

Schedule 1

<p>The variations to the permit which the Council has decided to make:</p>	<p>Date(s) on which the variation of the permit is to take place:</p>
<p>Update Regulations from Environmental Permitting (England and Wales) Regulations 2010 to Environmental Permitting (England and Wales) Regulations 2016</p> <p>Remove extraneous descriptive wording.</p> <p>Revise process description.</p> <p>Remove reference to PG6/17(04) Statutory guidance for printing of flexible packaging and replace with Process Guidance Note 6/17(11) Statutory guidance for printing of flexible packaging revised June 2014.</p> <p>Remove all conditions and replace with:</p> <p><u>Visible Emissions</u></p> <ol style="list-style-type: none"> 1. Emissions from combustion processes in normal operation should be free from visible smoke. 2. During start up and shut down the emissions should not exceed Ringelmann Shade 1 as described in BS2742:2009. 3. All other releases to air, other than condensed water vapour shall be free from persistent visible emissions. 4. All emissions to air shall be free from droplets. <p><u>Monitoring, investigating and reporting</u></p> <ol style="list-style-type: none"> 5. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the Operator should: <ul style="list-style-type: none"> • investigate and undertake remedial action immediately; • adjust the process or activity to minimise those emissions; and • promptly record the events and actions taken. 6. The Regulator shall be informed without delay, whether or not there is related monitoring showing an adverse result: <ul style="list-style-type: none"> • If there is an emission that is likely to have an effect on the local community; or • In the event of the failure of key arrestment plant, for example the catalytic oxidiser. 7. The Operator shall have a list of key arrestment plant and a written procedure for dealing with its failure available to the Regulator on request. 8. The Operator shall keep records of all inspections, tests, monitoring and visual assessments on site for at least two years and made available to the Regulator on request. 	<p>With Immediate effect.</p>

9. The Operator shall notify the Regulator at least 7 days before a periodic monitoring exercise to determine compliance with emission limit values. The Operator shall state the provisional time and date of the monitoring, pollutants to be tested and the methods to be used.
10. The results of such monitoring exercises shall be forwarded to the Regulator within 8 weeks of completion.
11. Adverse results from any monitoring exercise shall be investigated by the Operator as soon as the monitoring results are obtained. The Operator shall:
 - identify the cause and take corrective action;
 - record as much detail as possible regarding the cause and extent of the adverse results and the remedial action taken;
 - re-test to demonstrate compliance as soon as practicable and inform the Regulator of the steps taken and the retest results within 7 days of the results being obtained.

Emission limits, monitoring and other provisions for non-VOC releases

Table 4.1 - Emission limits, monitoring and other provisions for non-VOC releases

Row	Substance	Source	Emission limits/provisions	Type of monitoring	Monitoring frequency
1	Carbon Monoxide	Oxidation plant	100mg/Nm ³ as a 15 minute mean for contained sources	Catalytic oxidiser Monitoring and recording	Continuous
		From turbines, reciprocating engines or boilers used as VOC abatement equipment	500 mg/Nm ³ at 5% oxygen dry gas, as 15 minute mean for contained sources	PLUS Manual extractive testing All other types of abatement	PLUS Annual Annual
2	Particulate matter	All processes / activities	50 mg/Nm ³ as 15 minute mean for contained sources	Manual extractive testing	Annual
3	Oxides of Nitrogen (measured as nitrogen dioxide)	Oxidation plant	100mg/Nm ³ as a 15 minute mean for contained sources	Manual extractive testing	Annual
		From turbines, reciprocating engines or boilers used as VOC abatement equipment	500 mg/Nm ³ as 15 minute mean for contained sources		
4	Isocyanates	All processes / activities using isocyanates	0.1mg/Nm ³ as a 15 minute mean for contained sources excluding particulate and expressed as NCO	Manual extractive testing	Annual
5	Sulphur dioxide	All activities using heavy fuel oil or other residual type /comparable Quality Protocol Processed Fuel Oil	1% wt:wt sulphur in fuel	Sulphur content of fuel is regulated under the Sulphur Content of Liquid Fuels Regulations	
		All activities using gas oil / comparable Quality Protocol Processed Fuel Oil	0.1% wt:wt sulphur in fuel		

12. All continuous monitoring readings shall be on display to appropriately trained operating staff.
13. Instruments shall be fitted with audible and visual alarms, situated appropriately to warn the Operator of arrestment plant failure or malfunction, and these shall be recorded.
14. All continuous monitors shall be operated, maintained and calibrated (or referenced, in the case of indicative monitors) in accordance with the manufacturers' instructions, which shall be made available for inspection by the Regulator on request.
15. The relevant maintenance and calibration (or referencing in the case of indicative

monitors) shall be recorded.

16. Emission concentrations may be reported as zero when the plant is off and there is no flow from the stack. If required a competent person should confirm that zero is more appropriate than the measured stack concentration if there is no flow.
17. Any continuous monitor used should provide reliable data >95% of the operating time (i.e. availability >95%). A manual or automatic procedure shall be in place to detect instrument malfunction and to monitor instrument availability.
18. For extractive testing the sampling shall meet the following requirements:
 - For batch processes, where the production is complete within for example two hours, then the extractive sampling shall take place over a complete cycle of the activity **or**
 - Where the activity is continuous or has a batch cycle that is not compatible with the time available for sampling then the data required shall be obtained over a minimum of 2 hours in total
 - **and** no result of monitoring should exceed the emission limit concentrations specified.
19. For demonstration of compliance where a CEM is used:
 - no daily mean of all 15-minute mean emission concentrations shall exceed the specified emission concentration limits during normal operation (excluding start-up and shut-down); **and**
 - no 15-minute mean emission concentration shall exceed twice the specified emission concentration limits during normal operation (excluding start-up and shut-down).
20. The introduction of dilution air to achieve emission limits is not permitted.

Solvent Consumption and Management

21. Should the Operator wish to change the selected route for demonstrating compliance, an application in writing must be submitted to the Regulator along with an appropriate calculation demonstrating compliance with the required target emission limit.
22. A determination of the organic solvent consumption; the total mass of organic solvent inputs (I) minus any solvents sent for reuse/recovery off-site shall be made and submitted to Regulator annually. The determination shall be in the form of a mass balance in order to determine the annual actual consumption of organic solvent (C), where $C = I_1 - O_8$

See appendix 1 and figure 4.1 (of the Consolidated Permit).
23. At no time shall the Operator introduce any substance or preparation into the installation that is labelled with the hazard statements of H340, H341, H350, H350i, H351 H360D or H360F, without the prior written consent of the Regulator.

VOC control techniques

24. All potentially odorous waste material shall be stored in suitable closed containers.
25. Bunding should:

- be impervious and resistant to the liquids in storage **and**
- be capable of holding 110% of the capacity of the largest tank or drum.

26. Inks containing VOC shall be stored in closed storage containers.

27. All measures shall be taken to minimise VOC emission during mixing of inks.

28. Emissions from the emptying of mixing vessels and transfer of other VOC containing materials shall be contained using closed mobile containers or containers with close fitting lids.

29. Cleaning operations involving organic solvents shall be reviewed every two years to identify opportunities for reducing VOC emission (e.g. cleaning steps that can be eliminated or an alternative non-solvent cleaner has been sourced). The report shall be made available to the Regulator on request.

30. Application of cleaning solvents shall be:

- from a contained device or automatic system when applied directly on to machine rollers; and
- dispensed by piston type dispenser or similar contained device, when used on wipes.

31. When organic solvent is used on wipes:

- where practicable no organic solvent cleaning fluids or significantly less volatile organic solvents cleaning fluids should be used (with or without the addition of mechanical, chemical or thermal enhancements).

32. Fixed equipment should be cleaned in-situ and such equipment should, where practicable, be kept enclosed whilst cleaning is carried out.

33. Where equipment is cleaned off-line (such as screens, plates, drums, rollers and coating / ink trays) cleaning should be carried out using enclosed cleaning systems, wherever possible. Enclosed cleaning systems should be sealed to prevent emissions whilst in operation, except during purging at the end of the cleaning cycle. If this is not practicable emissions should be contained and vented to abatement plant.

34. Residual ink / coating contained in parts of the application equipment should be removed prior to cleaning.

35. Programmable scales shall be used during the mixing and preparation of inks to reduce organic solvent use.

36. A programme to monitor and record the consumption of ink/organic solvent against product produced should be used to minimise the amount of excess ink/organic solvent used.

37. All reasonably practicable efforts should be made to minimise the amount of residual organic solvent bearing material left in drums and other containers after use. All organic solvent contaminated waste should be stored in closed containers.

38. Prior to disposal, empty drums and containers contaminated with organic solvent should be closed to minimise emissions from residues during storage prior to disposal and labelled, so that all personnel who handle them are aware of their

contents and hazardous properties.

39. Nominally empty drums or drums containing waste contaminated with VOC awaiting disposal should be stored in accordance with the requirements for full or new containers.

40. Prior to disposal used wipes and other items contaminated with organic solvent should be placed in a suitably labelled bin fitted with a self-closing lid.

Note: from a health and safety perspective it is advised that bins should be emptied at least daily, as they not only present a fire hazard, they may also spontaneously combust.

41. For materials that may undergo spontaneous combustion special bins that allow air to circulate beneath and around them to aid cooling are advised or other bins specifically designed for this purpose.

Dust and spillage control

42. Dusty wastes should be stored in closed containers and handled in a manner that avoids emissions.

43. Dry sweeping of dusty materials should not normally be permitted unless there are environmental or health and safety risks in using alternative techniques.

44. Suitable organic solvent containment and spillage equipment should be readily available in all organic solvent handling areas.

Stacks, vents and process exhausts

45. Flues and ductwork shall be cleaned to prevent accumulation of materials, as part of the routine maintenance programme.

Training

46. All staff whose functions could impact on air emissions from the activity should receive appropriate training on those functions. This should include:

- awareness of their responsibilities under the permit;
- steps that are necessary to minimise emissions during start-up and shutdown;
- actions to take when there are abnormal conditions, or accidents or spillages that could, if not controlled, result in emissions.

47. The Operator shall maintain a statement of training requirements for each post with the above-mentioned functions and keep a record of the training received by each person. These documents shall be made available to the Regulator on request.

Maintenance

48. The Operator shall have the following available for inspection by the Regulator:

- a written maintenance programme for all pollution control equipment; and
- a record of maintenance that has been undertaken.

49. The activity shall operate in accordance with the Environmental Management System.

Schedule 2

Permit reference number 46 as varied by this notice is hereby attached.

Corby Borough Council
Environmental Services
Working towards a Cleaner Environment

ENVIRONMENTAL PERMIT

Environmental Permitting (England and Wales) Regulations 2016

Installation Address

Echo Packaging Ltd
Sondes Road
Willowbrook Industrial Estate
Corby
Northamptonshire
NN17 5XL

Echo Packaging Ltd is hereby permitted by Corby Borough Council to carry on a coating activity under Section 6.4(B)(a)(iv) of the Environmental Permitting (England and Wales) Regulations 2016 Schedule 1 as described below and within the installation boundary as marked red on the attached plan and in accordance with the conditions detailed in this Permit.

Signed.....



Date.....

26th August 2017

**Environmental Protection and Private Sector Housing Manager
Authorised Officer of the Council**

Contact Details:

Environmental Services
Deene House, New Post Office Square
Corby, NN17 1GD

Tel: 01536 464069
Fax: 01536 464644
Email: env.health@corby.gov.uk

Permit Holder:	Echo Packaging Ltd
Installation Address	Sondes Road Willowbrook Industrial Estate Corby Northamptonshire NN17 5XL
Head Office	As above

Provenance	Date
Application for Authorisation (EPA 90)	23 rd June 2010
Permit 'deemed' application	27 th July 2010
Permit issued	1 st October 2010
Variation Notice issued	24 th August 2017
Varied Permit issued	24 th August 2017

Scope

- i. The 'permitted activities' comprise the whole operation including the treating, handling and storage of any materials used in and products and wastes produced by the activities.
- ii. All pollutant concentrations shall be expressed at reference conditions of 273K and 101.3kPa, without correction for water vapour content.

Equipment List

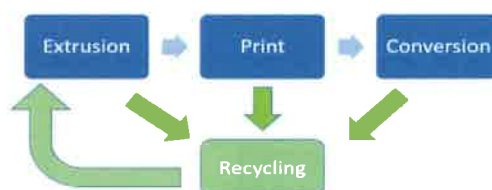
- 4 x Extruders
- 1 x Printing Press
- 7 x Bag making machines

Other equipment

1. Quantum 6000 catalytic oxidiser
2. Recycling machine
3. Pre-press

Process Description

The installation produces flexible packaging for the retail industry using flexographic printing of polyethylene sheets using solvent borne inks. The installation produces reels of printed packaging, which are further processed to produce plastic carrier bags.



Polythene extrusion

Polyethylene polymer granules are screw fed to a holding vessel where they are melted by an electromechanical process and fed in to a die. The molten plastic material is then blown with air to a set diameter. The amount of air blown onto the molten plastic determines the gauge of the plastic film (substrate).

The film (substrate) is cooled passing through a Corona discharge, which makes the film susceptible to the printing ink and wound on to a reel

Printing

The printing press is prepared using the appropriate 'stereo' (a suitable design to be imprinted on the substrate). Ink and solvent are mixed to a specific ink formulation, typically containing about 60% solvent. The press ready ink is loaded into the machine and pumped into the ink trays. There are various separate ink trays each capable of holding a different colour.

The press is then operated and the stereo is coated with the ink and the appropriate substrate is fed through the machine. The stereo impresses the desired design onto the substrate.

The printed substrate then passes to a dedicated hot air blower to dry the ink. The printed substrate is rewound onto reels and passes to the bag production machines.

The press is washed down with solvent before changing the ink. All solvent used for cleaning purposes is collected for recycling. Unused Ink is reused as press returns.

Exhaust gases from the process are abated through the Quantum 6000 catalytic oxidiser.

Raw Material Storage:

Ink is delivered in 20kg drums and solvent in a 1000 litre IBC. Ink is stored in the dedicated 'ink' room and solvent is stored in an external locked and bunded storage area outside the building.

Press ready inks are removed from the ink room as and when required by press operators. The ink room is kept locked when not in use.

Press returns storage:

Excess ink returned from the press is stored in the ink room for future use either directly or by mixing with other ink. Press return inks are mostly stored in the original containers.

Conditions:

The conditions contained within this Permit are based upon Process Guidance Note 6/17 (11) 'Statutory Guidance for Printing of Flexible Packaging' revised June 2014.

The requirements of the conditions attached to this permit shall come into effect on the date indicated in the individual condition or if no date is indicated shall take effect forthwith.

Visible Emissions

1. Emissions from combustion processes in normal operation should be free from visible smoke.
2. During start up and shut down the emissions should not exceed Ringelmann Shade 1 as described in BS2742:2009.
3. All other releases to air, other than condensed water vapour shall be free from persistent visible emissions.
4. All emissions to air shall be free from droplets.

Monitoring, investigating and reporting

5. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the Operator should:
 - investigate and undertake remedial action immediately;
 - adjust the process or activity to minimise those emissions; **and**
 - promptly record the events and actions taken.
6. The Regulator shall be informed without delay, whether or not there is related monitoring showing an adverse result:
 - If there is an emission that is likely to have an effect on the local community; **or**
 - In the event of the failure of key arrestment plant, for example the catalytic oxidiser.
7. The Operator shall have a list of key arrestment plant and a written procedure for dealing with its failure available to the Regulator on request.
8. The Operator shall keep records of all inspections, tests, monitoring and visual assessments on site for at least two years and made available to the Regulator on request.
9. The Operator shall notify the Regulator at least 7 days before a periodic monitoring exercise to determine compliance with emission limit values. The Operator shall state the provisional time and date of the monitoring, pollutants to be tested and the methods to be used.
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				Manual extractive testing	
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5	Sulphur dioxide	All activities using heavy fuel oil or other residual type /comparable Quality Protocol Processed Fuel Oil	1% wt/wt sulphur in fuel	Sulphur content of fuel is regulated under the Sulphur Content of Liquid Fuels Regulations	
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16. Emission concentrations may be reported as zero when the plant is off and there is no flow from the stack. If required a competent person should confirm that zero is more appropriate than the measured stack concentration if there is no flow.
17. Any continuous monitor used should provide reliable data >95% of the operating time (i.e. availability >95%). A manual or automatic procedure shall be in place to detect instrument malfunction and to monitor instrument availability.
18. For extractive testing the sampling shall meet the following requirements:

- For batch processes, where the production is complete within for example two hours, then the extractive sampling shall take place over a complete cycle of the activity **or**
- Where the activity is continuous or has a batch cycle that is not compatible with the time available for sampling then the data required shall be obtained over a minimum of 2 hours in total
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Solvent Consumption and Management

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See appendix 1 and figure 4.1.

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VOC control techniques

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27. All measures shall be taken to minimise VOC emission during mixing of inks.

28. Emissions from the emptying of mixing vessels and transfer of other VOC containing materials shall be contained using closed mobile containers or containers with close fitting lids.
29. Cleaning operations involving organic solvents shall be reviewed every two years to identify opportunities for reducing VOC emission (e.g. cleaning steps that can be eliminated or an alternative non-solvent cleaner has been sourced). The report shall be made available to the Regulator on request.
30. Application of cleaning solvents shall be:
 - from a contained device or automatic system when applied directly on to machine rollers; and
 - dispensed by piston type dispenser or similar contained device, when used on wipes.
31. When organic solvent is used on wipes:
 - where practicable no organic solvent cleaning fluids or significantly less volatile organic solvents cleaning fluids should be used (with or without the addition of mechanical, chemical or thermal enhancements).
32. Fixed equipment should be cleaned in-situ and such equipment should, where practicable, be kept enclosed whilst cleaning is carried out.
33. Where equipment is cleaned off-line (such as screens, plates, drums, rollers and coating / ink trays) cleaning should be carried out using enclosed cleaning systems, wherever possible. Enclosed cleaning systems should be sealed to prevent emissions whilst in operation, except during purging at the end of the cleaning cycle. If this is not practicable emissions should be contained and vented to abatement plant.
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35. Programmable scales shall be used during the mixing and preparation of inks to reduce organic solvent use.
36. A programme to monitor and record the consumption of ink/organic solvent against product produced should be used to minimise the amount of excess ink/organic solvent used.
37. All reasonably practicable efforts should be made to minimise the amount of residual organic solvent bearing material left in drums and other containers after use. All organic solvent contaminated waste should be stored in closed containers.
38. Prior to disposal, empty drums and containers contaminated with organic solvent should be closed to minimise emissions from residues during storage prior to disposal and labelled, so that all personnel who handle them are aware of their contents and hazardous properties.

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Note: from a health and safety perspective it is advised that bins should be emptied at least daily, as they not only present a fire hazard, they may also spontaneously combust.

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Training

46. All staff whose functions could impact on air emissions from the activity should receive appropriate training on those functions. This should include:
 - awareness of their responsibilities under the permit;
 - steps that are necessary to minimise emissions during start-up and shutdown;
 - actions to take when there are abnormal conditions, or accidents or spillages that could, if not controlled, result in emissions.
47. The Operator shall maintain a statement of training requirements for each post with the above-mentioned functions and keep a record of the training received by each person. These documents shall be made available to the Regulator on request.

Maintenance

48. The Operator shall have the following available for inspection by the Regulator:

Pollution Prevention & Control Act 1999
Permit Reference Number 46

- a written maintenance programme for all pollution control equipment;
and
- a record of maintenance that has been undertaken.

49. The activity shall operate in accordance with the Environmental Management System.

Right to appeal

You have the right of appeal against this permit within 6 months of the date of the decision. The Council can tell you how to appeal. You will normally be expected to pay your own expenses during an appeal. You will be liable for prosecution if you fail to comply with the conditions of this permit. If found guilty, the maximum penalty for each offence if prosecuted in a Magistrates Court is £50,000 and/or 6 months imprisonment. In a Crown Court it is an unlimited fine and/or 5 years imprisonment.

Our enforcement of your permit will be in accordance with the Regulators' Compliance Code.

Appendix 1

Definitions

The following definitions provide a framework for the mass balance calculations used in determining compliance.

Inputs of organic solvent in the time frame over which the mass balance is being calculated (I).

I₁ The quantity of organic solvents, or their quantity in raw materials and preparations 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).

Total Organic Solvent Input I₁ = IS + PS – FS

The mass of organic solvent contained in raw materials and preparations:

(IS) - in the initial stock at the start of the accounting period

(PS) - in the purchased stock at the start of the accounting period.

(FS) - in the final stock at the end of the accounting period.

I₂ The quantity of organic solvents or their quantity in raw materials and preparations 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.)

Outputs of organic solvents in the time frame over which the mass balance is being calculated (O).

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, eg - by thermal oxidation or other waste gas or waste water treatments, or captured, eg - by adsorption, as long as they are not counted under O₆, O₇, or O₈).

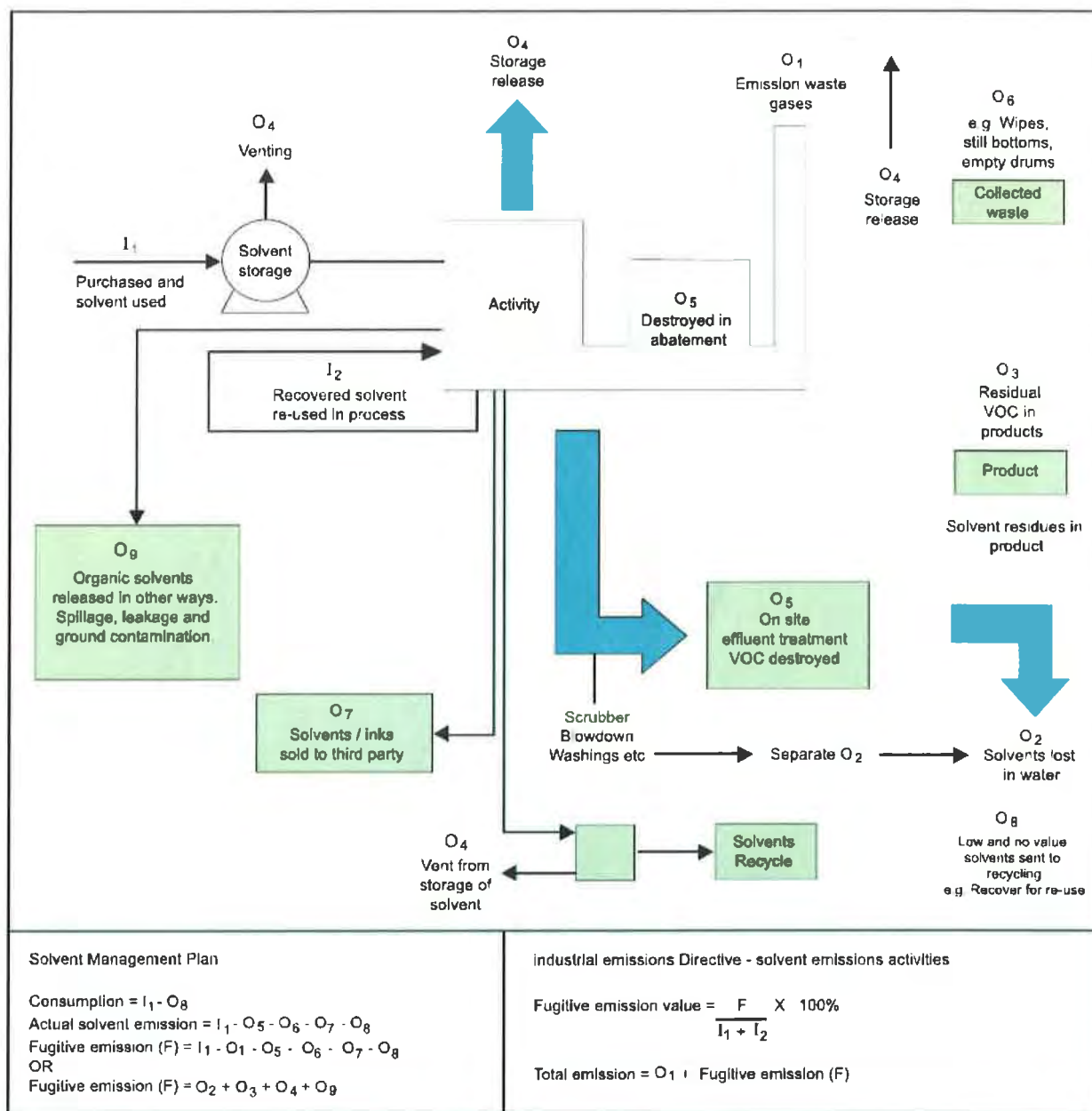
O₆ Organic solvents contained in collected waste.

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.

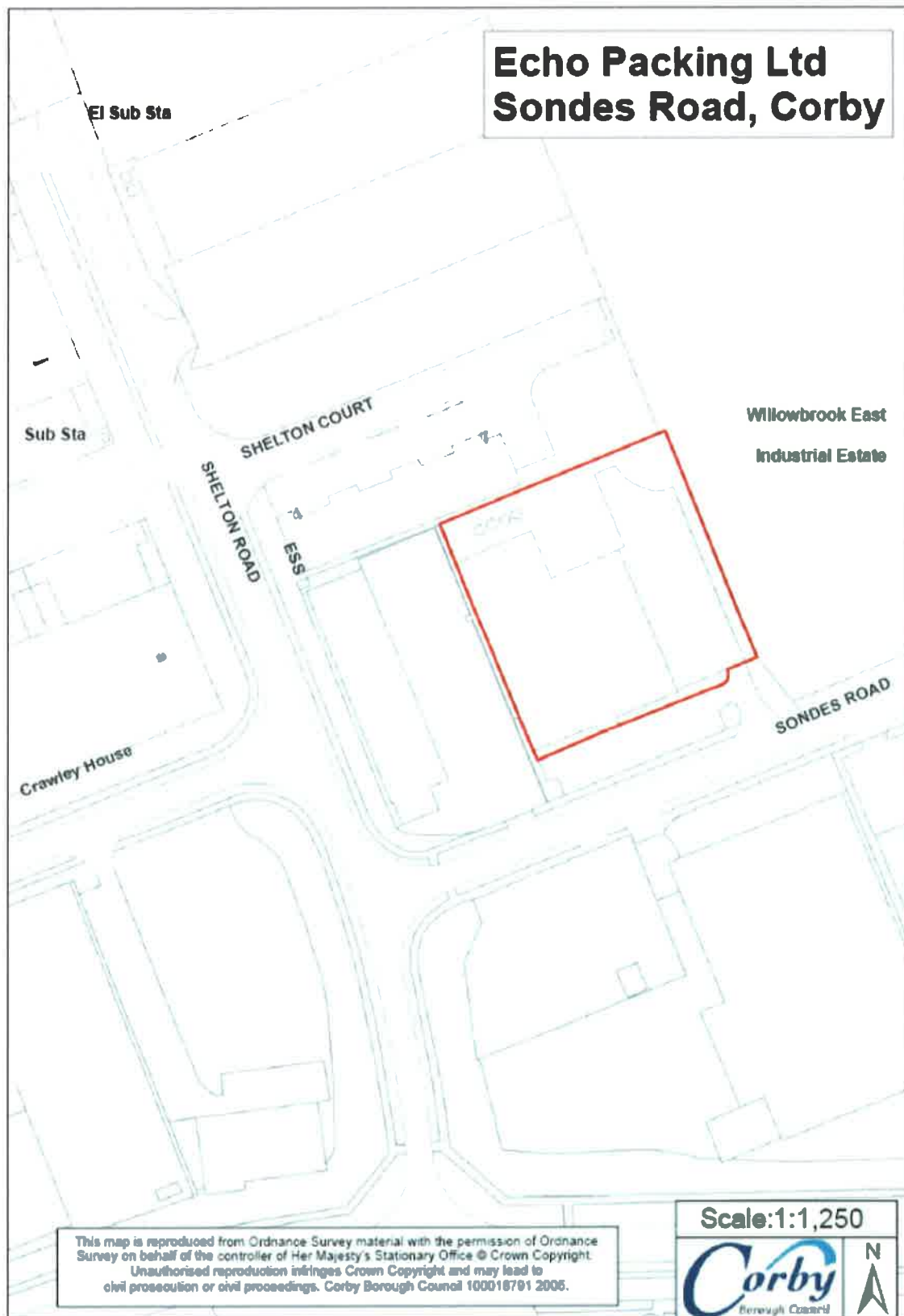
O₉ Organic solvents released in other ways.

Figure 4.1- solvent management plan inputs and outputs



Site Plan

Site boundary in red



Location Plan

