CONSOLIDATED PERMIT

Bath & North East Somerset Council

Hereby permits

Integrity Print Limited, Westfield Trading Estate, Midsomer Norton, Bath BA3 4BS

To Operate a Part B Installation at

Westfield Trading Estate, Midsomer Norton, Bath, BA3 4BS

Under the Provisions of

POLLUTION PREVENTION AND CONTROL ACT 1999
THE ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2010 (AS AMENDED)

Permit Reference:

LAPPC/97/P4

Signed on behalf of Bath and North East Somerset Council

Leigh Sanderson
Public Protection Officer (Environmental Monitoring)
As authorised officer of the Council

Date: 30th April 2015
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</tr>
</tbody>
</table>
INTRODUCTORY NOTE TO PERMIT

This introductory note does not form part of the permit.

This Environmental Permit (the Permit) is issued by Bath and North East Somerset Council (the Council) under Regulation 13 (1) of the Environmental Permitting (England and Wales) Regulations 2010 (S.I. 2010 No.675), to operate an installation prescribed in Schedule 1, Section 6.4 Part B of those regulations to the extent specified in the conditions of this permit.

The requirements of this Permit shall be effective from the date of service unless otherwise specified within the Permit. Where a Variation Notice has been served the conditions contained within that Variation Notice shall be effective from the date that the Notice is served, unless a specific implementation date is allocated to specific conditions.

For the purpose of this permit the legal operator of the Installation is Integrity Print Limited, Westfield Trading Estate, Midsomer Norton, Bath BA3 4BS.

The Permit includes the conditions that have to be complied with. It shall be noted that aspects of the installation which are not regulated by those conditions are subject to the guidance and recommendations detailed within the Process Guidance notes 6/16 (11). The Operator shall use the best available techniques for preventing or, where that is not practicable, reducing emissions from the installation.

DESCRIPTION OF AUTHORISED PROCESSES

Integrity Print is a printing installation as prescribed by Section 6.4 of the Environmental Permitting (England and Wales) Regulations 2010 using offset lithography printing plant with solvent laden exhaust air exhausted directly to atmosphere.
STATUS LOG

The status log sets out the permitting history.

<table>
<thead>
<tr>
<th>DETAIL</th>
<th>REFERENCE</th>
<th>DATE</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial Permit</td>
<td>EPA/97/P1</td>
<td>23.09.2004</td>
<td>Permit issued.</td>
</tr>
<tr>
<td>Variation Notice &amp; Consolidated Permit</td>
<td>EPA/97/P2</td>
<td>04.04.2005</td>
<td>Variation notice and consolidated permit issued.</td>
</tr>
<tr>
<td>Environmental Permit</td>
<td>EPA/97/P2</td>
<td>06.04.2008</td>
<td>Transfer to Environmental Permit by virtue of Regulation 69 of the Environmental Permitting (England and Wales) Regulations 2007.</td>
</tr>
<tr>
<td>Variation Notice with Consolidated Permit</td>
<td>EPA/97/P2/V2 and EPA/97/P2/C1</td>
<td>31.05.2012</td>
<td>Variations in regards to new process guidance note and to update print machinery.</td>
</tr>
<tr>
<td>Variation Notice with Consolidated Permit</td>
<td>LAPPC/97/P2/V3 and LAPPC/97/P2/C2</td>
<td>03.09.2012</td>
<td>Variation to update print machinery.</td>
</tr>
<tr>
<td>Variation Notice with Consolidated Permit</td>
<td>LAPPC/97/V4 and LAPPC/97/P3</td>
<td>13.02.2013</td>
<td>Variation to update print machinery.</td>
</tr>
<tr>
<td>Variation Notice with Consolidated Permit</td>
<td>LAPPC/97/V5 and LAPPC/97/P4</td>
<td>30.04.2015</td>
<td>Variation to update print machinery.</td>
</tr>
</tbody>
</table>

End of introductory note
**CONDITIONS**

01. The best available techniques shall be used to prevent or, where that is not practicable, reduce emissions from the installation in relation to any aspect of the operation of the installation which is not regulated by any other condition of this permit.

02. If the operator proposes to make a change in operation of the installation, the operator must, at least 28 days before making the change, notify the regulator in writing. The notification must contain a description of the proposed change in operation. It is not necessary to make such a notification if an application to vary this permit has been made and the application contains a description of the proposed change. In this condition “change in operation” means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.

**Permitted Installation**

03. The Operator is authorised to carry out the activities and/or the associated activities specified in Table A.

<table>
<thead>
<tr>
<th>Table A</th>
<th>Activities under Schedule 1 of the Regulations/Associated Activity</th>
<th>Description of specified activity</th>
<th>Schedule 1 activity Reference (if Applicable)</th>
<th>Limits of specified activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Printing on paper substrates.</td>
<td>Offset Printing as described in Table C.</td>
<td>6.4 B.</td>
<td>From ink kitchen to exhaust extract for VOC laden air.</td>
<td></td>
</tr>
<tr>
<td>Waste removal.</td>
<td>Storage and handling of waste inks and cleaning solvents.</td>
<td>Directly associated activity.</td>
<td>From presses to sealed storage, prior to disposal via a registered carrier.</td>
<td></td>
</tr>
</tbody>
</table>

04. The operator shall carry out the activities and associated activities as specified in Table A within the boundary shown edged in red in Appendix A.
Non VOC Emission Limits

05. Natural gas or electric dryers shall be used for presses.

Particulate matter

06. The installation shall comply with the emission limits in Table B below.

<table>
<thead>
<tr>
<th>Substance</th>
<th>Source</th>
<th>Emission limits/provision</th>
<th>Type of monitoring</th>
<th>Monitoring frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate matter</td>
<td>From paper cutting and slitting operations.</td>
<td>50 mg/Nm$^3$ as a 30 minute mean.</td>
<td>Manual Extractive testing in accordance with BS ISO 9096:2003 (where not internally vented).</td>
<td>Regarded as achieved where previous testing has shown less than 25% of the emission limit, testing is not possible, or where abatement plant vents internally, or vents via bag filtration plant designed to achieve the emission limit, otherwise annually.</td>
</tr>
<tr>
<td></td>
<td>From other contained sources.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

07. Emissions of particulate matter shall be abated if necessary to meet the emission limit.

Reduction Scheme

08. The Operator shall demonstrate compliance with the Reduction Scheme if the annual actual solvent emission determined by the Solvent Management Plan is less than or equal to the Target Emission. Where:

Annual Actual Solvent Emission = $I_1 - O_8 - O_7 - O_6 - O_5$ (for definitions see Appendix B).

The Target Emission is specified below:

The Target Emission Value = Total Mass of Solids x 1

09. The Reduction Scheme compliance route shall not permit:

i. the replacement of a low or no organic solvent coating with a conventional high organic coating system; or

ii. the introduction of such a high organic solvent coating system into a process / activity; or

iii. the introduction of such a high organic solvent coating system into a product where it was not in use before; or
iv. the introduction of high solids formulations which have no beneficial effect on the product but increase the solids used, except where a reduction in the overall VOC emissions can be demonstrated.

10. Any proposal to introduce a conventional high organic coating system shall be submitted to the Council Regulator, together with the reasons why lower organic solvent systems are not considered technically appropriate or practicable.

Solvent Management Plan

11. The Operator shall submit an annual Solvent Management Plan (SMP), as per Appendix B of this permit, and annually thereafter. The SMP shall be received no later than the end of April each year.

Monitoring, investigation and recording

12. The Operator shall keep a record (log book) of all inspections, tests and monitoring including non-continuous monitoring, inspections and visual assessments. Current records shall be kept on site and be available for inspection by the Regulator. Records shall be kept for at least two years.

13. The temperatures of chiller units that serve the printing presses listed overleaf (Table C) shall be recorded fortnightly and be made available, upon request, for inspection by the Regulator. Any units found to be operating above requisite temperatures shall be serviced as soon as practicable.

14. In the event of failure of the chiller units or if temperatures achieved are significantly above those required to keep solvent losses to an absolute minimum, cease the printing operation at the relevant machine until this problem has been rectified.

In the event of abnormal emissions comply with the requirements of conditions 19 and 20.
### TABLE C (press list and performance criteria)

<table>
<thead>
<tr>
<th>Machine ID</th>
<th>Dept.</th>
<th>Colours</th>
<th>Features</th>
<th>Alcohol %</th>
<th>Chiller Unit</th>
<th>Bagged Trim waste</th>
<th>Bagged Sprocket waste</th>
</tr>
</thead>
<tbody>
<tr>
<td>Muller - 1</td>
<td>WSS</td>
<td>3</td>
<td>U/V Sheet</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 2</td>
<td>WSS</td>
<td>4</td>
<td>U/V Scitex</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 3</td>
<td>WSS</td>
<td>8</td>
<td>U/V</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 4</td>
<td>WSS</td>
<td>5</td>
<td>U/V</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 5</td>
<td>WSS</td>
<td>4</td>
<td>U/V</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 6</td>
<td>WSS</td>
<td>10</td>
<td>U/V</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 7</td>
<td>WSS</td>
<td>8</td>
<td>U/V Sheet</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 12</td>
<td>FF</td>
<td>3</td>
<td>U/V</td>
<td>1 to 4%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 15</td>
<td>FF</td>
<td>4</td>
<td></td>
<td>1 to 4%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 18</td>
<td>FF</td>
<td>8</td>
<td>U/V Ink Jet</td>
<td>1 to 4%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 20</td>
<td>FF</td>
<td>4</td>
<td></td>
<td>1 to 4%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 21</td>
<td>FF</td>
<td>8</td>
<td>U/V</td>
<td>1 to 4%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 23</td>
<td>FF</td>
<td>4</td>
<td>U/V</td>
<td>1 to 4%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 32</td>
<td>FF</td>
<td>4</td>
<td></td>
<td>7 to 9%</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 34</td>
<td>FF</td>
<td>4</td>
<td>U/V</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>K - 1</td>
<td>WSS</td>
<td>4</td>
<td>U/V Sheet</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>K - 2</td>
<td>WSS</td>
<td>5</td>
<td>U/V Sheet</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>H - 9</td>
<td>WSS</td>
<td>5</td>
<td>U/V</td>
<td>7 to 9%</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>H - 14</td>
<td>WSS</td>
<td>5</td>
<td>U/V</td>
<td>7 to 9%</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Goebel E1</td>
<td>WSS</td>
<td>6</td>
<td>U/V</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Morgan - 1</td>
<td>WSS</td>
<td>7</td>
<td></td>
<td></td>
<td>IPA Free</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Morgan - 3</td>
<td>WSS</td>
<td>6</td>
<td>U/V</td>
<td></td>
<td>IPA Free</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 40</td>
<td>ST P</td>
<td>8</td>
<td>U/V</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 41</td>
<td>ST P</td>
<td>5</td>
<td>U/V</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 43</td>
<td>FF</td>
<td>5</td>
<td>Hot Carbon</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 44</td>
<td>FF</td>
<td>5</td>
<td>Hot Carbon</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Muller - 45</td>
<td>ST P</td>
<td>9</td>
<td>UV</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Pack 2 Pack</td>
<td>Sec P</td>
<td>1</td>
<td>IPA Free</td>
<td></td>
<td>No</td>
<td>No</td>
<td>N/A</td>
</tr>
<tr>
<td>WT - 1</td>
<td>ST P</td>
<td>1</td>
<td>Dry Offset</td>
<td></td>
<td>Yes</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>WT - 5</td>
<td>ST P</td>
<td>1</td>
<td>Dry Offset</td>
<td></td>
<td>Yes</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>PCM - 2</td>
<td>ST P</td>
<td>1</td>
<td>Dry Offset</td>
<td></td>
<td>Yes</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>H – 25</td>
<td>ST P</td>
<td>2</td>
<td></td>
<td>7 to 9%</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>P1</td>
<td>ST P</td>
<td>1</td>
<td>Flexo</td>
<td>0%</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>P2</td>
<td>ST P</td>
<td>6</td>
<td>Flexo/UV</td>
<td>0%</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>P4</td>
<td>ST P</td>
<td>4</td>
<td>Flexo/UV</td>
<td>0%</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>P5</td>
<td>ST P</td>
<td>6</td>
<td>Flexo/UV</td>
<td>0%</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>P6</td>
<td>ST P</td>
<td>8</td>
<td>Flexo/UV</td>
<td>0%</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Xeikon</td>
<td>ST P</td>
<td>4</td>
<td>Digital</td>
<td>0%</td>
<td>No</td>
<td>No</td>
<td>N/A</td>
</tr>
<tr>
<td>G 08</td>
<td>ST P</td>
<td>8</td>
<td>UV</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>G 10</td>
<td>ST P</td>
<td>10</td>
<td>UV</td>
<td>7 to 9%</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

### Visible and odorous emissions

15. Emissions from any combustion process shall be free from visible smoke in normal operation and in any case shall not exceed the equivalent of Ringelmann Shade 1 as described in British Standard BS 2742:2009.

16. All releases to air, other than condensed water vapour, shall be free from persistent visible emissions.
17. All emissions to air shall be free from droplets.

18. There shall be no offensive odour beyond the site boundary, as perceived by the Regulator.

**Abnormal events**

19. The Environmental Monitoring Team of Bath and North East Somerset Council shall be notified without delay of any incident or accident significantly affecting the environment.

20. Where abnormal emissions, malfunctions or breakdowns leading to abnormal emission occur the operator shall;
   a) investigate immediately and undertake corrective action
   b) adjust the process or activity to minimise those emissions; and
   c) promptly record (within one working day) the events and actions taken.

21. The operator shall provide a list of key arrestment plant and shall have a written procedure for dealing with its failure, in order to minimise any adverse effects.

**CONTROL TECHNIQUES**

**VOC and odour control: storage**

22. All ozone created during curing processes shall be extracted to atmosphere and dispersed via an unrestricted stack.

23. Coatings containing VOCs (including thinners and cleaning solvents) shall be stored in closed storage containers.

24. All VOC storage containers shall be stored within bunded enclosed areas, except for point of use containers and caged IBCs.

25. To minimise breathing losses from bulk storage tanks:
   i. Any exterior bulk storage tanks that may be installed shall be painted in a light colour by no later than 31st December 2013.
   ii. All new static bulk organic solvent storage tanks containing organic solvent within a composite Vapour Pressure that is likely to exceed 0.4kPa at 20°C (293k) shall be fitted with a pressure vacuum relief valve.

**VOC Control Handling**

26. Inks/coating containing VOCs shall be stored in closed storage containers.

27. All measures shall be taken to minimise VOC emissions during mixing, i.e. the use of covered or closed mixing vessels.
28. Emissions from the emptying of mixing vessels and transfer of materials shall be adequately contained, preferably by the use of closed transfer systems. This may be achieved by the use of closed mobile containers, containers with close-fitting lids or, preferably, closed containers with pipeline delivery.

**Offset printing**

29. Isopropanol use in the damping solution and mixed in the Technotrans mixing units shall not exceed the concentration listed in Table C for the relevant press (+/- 1.0%) within that solution.

30. The concentration of isopropanol in the Technotrans mixing units shall be checked manually by hydrometer in accordance with the maintenance schedule, and at least monthly, a record of the check and the values measured shall be made.

31. All presses listed in Table C as being fitted with chiller units shall have those chiller units maintained and the temperature controlled such that the usage of isopropanol is minimised.

**VOC control: cleaning**

32. At least once every two years, all cleaning operations involving the use of organic solvents shall be reviewed to identify opportunities for the reduction of VOC emissions. The operator shall provide the Regulator with a report on the conclusions of the review.

33. The application of cleaning solvents onto cleaning cloths shall be by piston type dispenser, wash bottle with nozzled tube, or pre-impregnated wipes from an enclosed container used.

34. Pre-impregnated wipes shall be held within an enclosed container prior to use.

35. Where practicable, no organic solvent cleaning fluids or significantly less volatile organic solvent cleaning fluids shall be used (with or without the addition of mechanical, chemical or thermal enhancements).

36. Where practicable, fixed equipment shall be cleaned in-situ and such equipment shall, where practicable, be kept enclosed whilst cleaning is carried out.

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

38. Residual ink / coating contained in parts of the application equipment shall be removed prior to cleaning.
**VOC control: operational**

39. Bulk storage tanks for organic solvents and organic solvent-containing liquids shall, wherever practicable, be back-vented to the delivery tank during filling. Where this is impracticable, displaced air vents shall be sited in such a way as to prevent the arising of offensive odour beyond the site boundary.

40. Lockable tanker connections shall be provided.

41. Delivery connections to bulk storage tanks shall be located within a bunded area.

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

43. Bunding shall:
   i. completely surround the bulk liquid storage tanks
   ii. be impervious and resistant to the liquids in storage; and
   iii. be capable of holding 110% of the capacity of the largest storage tank.

44. Programmable scales shall be used during the mixing and preparation of inks / coatings to reduce organic solvent usage.

45. A programme to monitor and record the consumption of inks / coatings / organic solvent against product produced shall be used to minimise the amount of excess organic solvent / coating / ink used.

**VOC control: waste**

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

47. Prior to disposal, empty drums and containers contaminated with organic solvent shall be closed to minimise emissions from residues during storage prior to disposal and labelled, so that all that handle them are aware of their contents and hazardous properties.

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

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

50. Copies of any receipts of any dirty solvent and waste ink that has been recycled on or off site shall be kept for 3 years.
GENERAL CONTROL TECHNIQUES
Dust and spillage control

51. Suitable organic solvent containment and spillage equipment shall be available at the presses and solvent stores.

52. A high standard of housekeeping shall be maintained.

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

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

AIR QUALITY
Dispersion and dilution from stack

55. The discharge exhaust fitted to the presses shall discharge vertically upwards without any restriction (such as a cap or cowl).

MANAGEMENT

56. Staff at all levels shall receive the necessary training and instruction in their duties relating to the control of the process emissions to air. Training shall include:

   i. Awareness of their responsibilities under the permit.

   ii. Minimising emissions on start-up and shutdown.

   iii. Action to minimise emissions during abnormal conditions.

57. Effective preventive maintenance shall be employed on all plant and equipment concerned with the control of emissions to air. A written maintenance programme shall be drafted for the presses, Technotrans units and chillers detailed in Table C and the particulate abatement plant. The programme shall be made available to the regulator on request.

58. Either essential spares and consumables shall be held for all arrestment plant, or alternatively:

   i. A service contract for the arrestment plant, which includes a priority attendance requirement for arrestment plant failure, shall be held with a suitable contractor or:

   ii. A mobile service and repair engineer carrying essential spares and consumables shall be employed by the Company.

59. An appropriate management system shall be adopted by the company, such as ISO 14001.

End of Conditions
Further information

Confidentiality
The Permit requires the Operator to provide information to Bath & North East Somerset Council. The Council will place that information on to the Public Registers in accordance with the requirements of the Regulations. If the Operator considers that any information provided is commercially confidential, it may apply to the Council to have such information withheld from the Register, as provided in the Regulations. To enable the Council to determine whether or not the information is commercially confidential, the Operator shall clearly specify the information in question and provide clear and precise reasons for its confidentiality.

Variation to the Permit
This Permit may be varied in the future (by the Council serving a Variation Notice on the Operator) as per Regulation 20 of the EP Regulations. If the Operator wishes to make a change in the operation of the installation, the Council must be notified in writing at least 28 days before making the change. The notification must include a description of the proposed changes and, if the Operator wants any of the Conditions in the Permit to be changed, a formal application to vary them must be submitted. Conditions in this Permit will be reviewed periodically as per Regulation 34 of the EP Regulations.

Surrender of the Permit
Before this permit can be wholly or partially surrendered, an application to surrender the permit has to be made. For the application to be successful, the applicant must be able to demonstrate to the Council, in accordance with Regulation 24 of the EP Regulations, that there is no pollution risk and that no further steps are required to return the site to a satisfactory state.

Transfer of the Permit or part of the Permit
Before the Permit can be wholly or partially transferred to another person, an application to transfer the Permit has to be made jointly by the existing and proposed holders, in accordance with Regulation 21 of the Environmental Permitting Regulations. A transfer will not be allowed unless the Council considers that the proposed holder will be the person who will have control over the operation of the installation and will comply with the conditions of the transferred Permit.

Contact Details
If you require any further details and application forms mentioned above please contact the Environmental Monitoring team on 01225 396693 and ask to speak to an officer dealing with Local Authority permitted installations. You may also wish to visit the website to download any application forms that you may need: http://www.bathnes.gov.uk/
APPEAL AGAINST PERMIT CONDITIONS

Anyone who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State for the Environment, Transport and the Regions. Appeals must be received by the Secretary of State no later than 6 months from the date of the decision (the date on the bottom of the Permit).

Appeals relating to processes in England shall be received by the Secretary of State for the Environment, Transport and the Regions. The address is as follows:-

The Planning Inspectorate
Room 4/19 Eagle Wing
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

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

(a) a statement of the grounds of appeal;
(b) a copy of any relevant application;
(c) a copy of any relevant Permit;
(d) a copy of any relevant correspondence between the person making the appeal ("the appellant") and the Council;
(e) a statement indicating whether the appellant wishes the appeal to be dealt with
   - by a hearing attended by both parties and conducted by an inspector appointed by the Secretary of State; or
   - by both parties sending the Secretary of State written statements of their case (and having the opportunity to comment on one another's statements).

At the same time, the notice of appeal and documents (a) and (e) must be sent to the Council, and the person making the appeal shall inform the appropriate Secretary of State that this has been done.

Please Note

- an appeal will not suspend the effect of the conditions appealed against; the conditions must still be complied with.
- in determining an appeal against one or more conditions, the Act allows the Secretary of State in addition to quash any of the other conditions not subject to the appeal and to direct the Local Authority either to vary any of these other conditions or to add new conditions.
APPENDIX A – LOCATION OF INSTALLATION

The boundary of the site is shown in red.
APPENDIX B - Reduction Scheme – No VOC Abatement (reproduced from PG6/16(11))

- An operator may choose to use the Reduction Scheme for an installation to achieve emission reductions to a “Target Emission” equivalent to those which would have been achieved if the concentration emission limits had been applied.

The following scheme shall operate for installations for which a constant solid content of product can be assumed and used to define the reference point for emission reductions.

The operator shall forward an emission reduction plan, which includes in particular:

- Decreases in the average solvent content of the total input; and/or
- Increased efficiency in the use of solids to achieve a reduction of the total emissions from the installation.

- The Target Emission for an installation is calculated as follows;

  (a) The Total Mass of Solids in the quantity of coating consumed in a year is determined.

  - Solids are all materials in coatings that become solid as a result of curing, polymerisation, or the evaporation of the water or solvent.

  - All ingredients other than water and organic solvents should be assumed to form part of the solid coating.

  (b) Target Emission Values must then be used to determine the Target Emission.

  The non-volatile content of the coating, as supplied, will usually be available from the supplier. This may be quoted in g/l or in % mass by weight. In cases of doubt, the reference standard for the determination of non-volatile % mass by weight is BS EN ISO 3251 (also numbered BS 3900: B18). The test conditions may need to be adjusted for the particular conditions of use or when assessing chemically or radiation cured coatings, where otherwise volatile components react to form part of the dry solid coating.

Compliance with Reduction Scheme

- Compliance with the Reduction Scheme is achieved if the annual actual solvent emission determined from the Solvent Management Plan is less than or equal to the Target Emission.

Where the annual actual solvent emission is:

annual actual solvent emission = I1-O8-O7-O6

(see Definitions below)
**Determination of Solvent Consumption**

- Construction of inventories of materials consumed and disposed of may involve the identification of individual organic solvents or solids. This may give rise to an issue of commercial confidentiality. Information supplied must be placed on the public register, unless exclusion has been granted on the grounds of commercial confidentiality or national security.

- A determination of the organic solvent consumption, the total mass of organic solvent inputs minus any solvents sent for reuse/recovery off-site, should be made and submitted to the Regulator annually, preferably to coincide with the operator's stock-taking requirements, in the form of a mass balance in order to determine the annual actual consumption of organic solvent (C):

Where: \( C = I_1 - O_8 \)

\( I_1 \) Total quantity of organic solvents, or their quantity in preparations purchased which are used as input into the process/ activity.

A calculation of the purchased organic solvent Input (\( I_1 \)) to the process/ activity, is carried out by recording:

(i) The mass of organic solvent contained in coatings, diluents and cleaners in the initial stock (IS) at the start of the accounting period; plus

(ii) The mass of organic solvent contained in coatings, diluents and cleaners in the purchased stock (PS) during the accounting period.

(iii) Minus the mass of organic solvent contained in coatings, diluents and cleaners in the final stock (FS) at the end of the accounting period.

\[ \text{Total Organic Solvent Input (I1)} = \text{IS} + \text{PS} - \text{FS} \]

**Solvent Management Plan**

- The Solvent Management Plan provides definitions and calculations to demonstrate compliance with the VOC requirements of this note. The use of the standard definitions and calculations also ensures consistency of VOC compliance across installations within an industrial sector.

- The definitions provided must be used in all calculations relating to the Solvent Management Plan (SMP). For process/activities using the reduction scheme, the SMP should be used to determine the actual emissions annually.

**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 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).

I2 The quantity of organic solvents or their quantity in 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, 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 preparations, which are sold or are intended to be sold as a commercially valuable product.

O8 Organic solvents contained in preparations 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.