EP Permit ref: B04/94
Variation ref: PPC 13/14

Huntingdonshire District Council
The Environmental Permitting (England and Wales) Regulations 2010 as amended, Regulation 20 [and Regulation 18 *in relation to consolidated permits*]

Variation Notice

To **Linx Printing Technologies Ltd**
8 Stocks Bridge Way
St Ives
Cambridgeshire
PE27 5JL

Huntingdonshire District Council ("the Council"), in the exercise of the powers conferred upon it by regulation 20 of the Environmental Permitting (England and Wales) Regulations 2010 as amended[1] ("the 2010 Regulations") hereby gives you notice as follows-

The Council has decided to vary the conditions of permit reference B04/94 granted under regulation 13(1) of the 2010 Regulations in respect of the operation of the installation at
Linx Printing Technologies Ltd
33 Edison Road
St Ives
PE27 3LF.

The variation of the conditions of the permit and the date [s] 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 Huntingdonshire District Council

.....
Head of Community Services
An authorised officer of the Council

Date: 4 December 2014

[1] SIXXX

EP Permit ref: B04/94
Variation ref: PPC 13/14

Schedule 1

Variation to the conditions of the permit	Date(s) on which the variation is to take place
Vary permit holder head office details	4 December 2014

Signed on behalf of Huntingdonshire District Council

..... Date: 4 December 2014

Head of Community Services
An authorised officer of the Council

EP Permit ref: B04/94
Variation ref: PPC 13/14

Schedule 2

Permit reference B04/94 as varied by this notice.

(Insert amended or full consolidated permit).

Huntingdonshire
DISTRICT COUNCIL

PERMIT

Pollution Prevention and Control Act 1999

Environmental Permitting (England and Wales) Regulations 2010 as amended

Permit Reference: **B04/94**
As varied by: **EPA24/00, EPA10/01 & PPC10/08**

Huntingdonshire District Council (the regulator) hereby permits Linx Printing Technologies Ltd 8 Stocks Bridge Way St Ives Cambridgeshire PE27 5JL to operate a ink manufacturing process as defined in Part 2 of Schedule 1 to the EP Regulations Section 6.5, and as described below in accordance with the following conditions which shall apply forthwith.

Address of permitted activity: Linx Printing Technologies Ltd
33 Edison Road
St Ives
PE27 3LF

Location plan can be seen on B04/94 (a) Location plan

Description of Activity

Linx Printing Technologies PLC manufacture industrial marking and coding equipment, solvent and inks with the focus of this document based on the solvent and ink production.

Raw Materials

Fluids

The bulk of all material used in the process are solvents which include methyl ethyl ketone (MEK), acetone, TSDA2 (de-natured alcohol), ethyl lactate and diethyl ketone (DEK). The bulk fluids are delivered and stored in 1000L IBC's, they are unloaded on a bunded forecourt and stored in a bunded warehouse. Less frequently used fluids are delivered in 200L drums but are handled and stored the same way as the IBC's.

Dry powders/resins

A dry storage room houses all the dry materials that are added to the solvents to produce a variety of inks. Dry materials are received in various packaging materials and in bags, drums and tubs. Within the dry storage room is a powder handling booth which is fitted with a PIR controlled 3 point dedicated mechanical extraction system with internal dust filtration. There is also a boost option in the event of a large spill that is activated by depressing a button. This booth is used to weigh the dry ingredients into relevant batch size quantities from their supplier packaging into antistatic pail liners.

Production

Mixing

Production is divided between two lines; a main line which is semi-automated for large batch sizes of either ink or solvent and a mini line which is a manual bottling process for both ink and solvent in smaller batch sizes.

Main line solvents

There are two 1000 litre dedicated solvent mixing vessels in the bottling room that are used to mix the fluid materials required in the manufacture of the solvents. The required volumes of specific fluids are pumped from the storage room via a manifold system into the mixing vessels using pneumatic pumps and flow meters. Once the required quantities of fluids are in the mixing vessel an additional pump circulates the fluids to ensure they are mixed before bottling.

Mini Line solvents

As with the main line the required volume of fluid is pumped through a dedicated outlet into 100 litre capacity mobile drums, these drums are then transferred to the mini line bottling line.

Inks

There are two ink mixing vessels, the main line with a capacity of 500 litres and the mini line with a 200 litre capacity. The filling and mixing process of these are identical. The required fluid is pumped from the storage room via the manifold system directly into the mixing vessel, during this time the manway and mechanical extraction points are kept closed. Once the vessels are charged with solvent the mixers are started and the extraction point opened. The dry materials that had been weighed in advance are then added to the solvent from the pail liners via the manway. Once the materials are added the manway and extraction point are closed for the remaining mixing time which is typically 30 minutes.

Inks are subjected to quality control activities before they can be bottled so a 500ml sample is taken to the QC laboratory area for testing; the laboratory has dedicated mechanical extract ventilation. If the ink fails a test it is permissible to remix it with an allowed percentage of additional materials, this controlled remix procedure follows the same process as the main mix. Once the ink has passed the QC tests it can then be bottled.

Bottling

Main line

Main line inks and solvents are bottled in exactly the same way but they each have a dedicated mobile filler unit that can be swapped in and out of the bottle line as required, this is to prevent ink contamination in the solvent production. The filling units have a constant level header tank that is fed from the main mixing vessels (either ink or solvent depending upon production) which then pump the fluid into the waiting bottles. The fill rate is approximately 18 litres per minute for ink and 21 litres per minute for solvent. The bottling unit has a single extract ventilation point. The filled bottles pass along a conveyor to the capping station which has a single point mechanical extract ventilation, there is no extraction provided along the conveyor. After the capping process the bottles pass further along the conveyor through an induction sealer and labelling operation. A sample bottle of ink or solvent is taken from the line into the QC laboratory for further testing before released for sale.

Mini line

The ink or solvent in the mini line 100 litre drums are positioned next to the hand operated filling machine, a pick-up tube is lowered into the vessel and through this the fluid is vacuumed up into a single bottle. Once full the bottle has a cap placed on it and then put into a capping machine that torques the cap onto the bottle, there is no mechanical extract ventilation provided in this process. The bottles are then put into mobile cages and when the batch is completed they are transported to a separate area for sealing and labelling.

Cleaning

Main line

After a batch of ink or solvent has been produced there is residual fluid in the filler header tank and filling chambers, the header tank is drained with a vacuum pump into a 200 litre drum. Ink and contaminated solvent goes directly into a waste drum but clean solvent is retained in a separate 200 litre drum and reused as "cleaning solvent". The clean solvent can be used to clean the ink mixing vessel and flushed through the ink system pipework, it is also used for general cleaning within the filling room. The residual solvent in the filling chambers of the solvent line is pumped into bottles at the start of the next production run, it takes approximately 12 litres of production to flush the old solvent out of the system. This bottled solvent is separated from the production process and emptied via a sealing funnel into the 200 litre drum for cleaning fluid.

Mini Line

Due to the production method there is much less residual fluid after a production run on the mini line compared to the main line. For ink the mixing vessel and pick-up tubes are cleaned and flushed with cleaning solvent and the mobile vessels wiped with solvent and spill pads. For a solvent run the residual solvent is reused for cleaning as with the main line.

General

The dyes and materials we use require us to clean vessels between batches to ensure we don't contaminate products, we use the captured clean solvent and spill pads to wipe clean areas and the contaminated pads are disposed of in a metallic closed bin. Once the waste fluid drums are full the contents are pumped into a 1000 litre waste safe located in the bunded fluid store room. Linx have a contract with a licensed facility to collect and safely dispose of all our waste products.

Emissions

There are various points of emission within the unit but they are mainly focused within the bottling room. The movement of solvent in any unsealed container will generate emissions but we seal vessels, bottles or any containers as soon as possible.

Abatement

The bottling room is under negative pressure via multiple floor level mechanical extraction points that feed into a ducting system with a final point of discharge 3 metres above the roof without abatement.

Conditions

Emission limits, monitoring, investigating, reporting and record keeping

	Pollutant	Source	Emission limit	Type of monitoring	Monitoring frequency
1.	Particulate matter	Waste gases from ink manufacturing plant	20 mg/Nm^3 as 8 hour mean (1)	Manual extractive monitoring	Annual
2.	Particulate matter	Entire site	No visible emissions		
3.	VOC	Waste gases from ink manufacturing plant	150mg C/Nm^3 (1)	Manual extractive monitoring	Annual
4.	VOC	Fugitive emissions	5% of organic solvent input	Manual calculation	Within 12 months of issue of permit then following any changes to process operations.
5.	VOC	Solvents used in in manufacturing plant	Solvent consumption (2)	Manual calculation	Annual
6.	VOC	Solvents used in in manufacturing plant	Total emission limit value of 5% of organic solvent input (3)	Manual calculation	Annual
7.	Odour	Entire site	No offensive odours		
(1) Reference conditions are 273.1K, 101.3kPa, without correction for water vapour content, unless otherwise stated. (2) See B04/94 (b) for how to calculate solvent consumption. (3) See B04/94 (c) for how to calculate total emission limit value.					

8. Where, in the opinion of the regulator, there is evidence of airborne dust or offensive odours from the process off the site, the operator shall make their own inspection and assessment, and where necessary corrective action shall be taken without delay.

9. Materials used in the ink manufacturing plant that are designated, because of their VOC content shall not be used in the process.
   Hazard statement H340, H350, H350i, H360D, H341 or H351
   Risk Phrases R45, R46, R49, R60, R61, R50 or R68

10. The operator shall keep records of inspections, tests, audits and monitoring, including all non-continuous monitoring, inspections and visual assessments. Records shall be:
    (a) Kept by the operator for at least two years; and
    (b) Made available for the regulator to examine.

11. Any records kept off-site shall be made available for inspection within one working week of any request by the regulator.

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

13. The operator shall ensure that relevant stacks or ducts are fitted with suitable sampling points to comply with the relevant British or equivalent standard.

14. All appropriate precautions shall be taken to minimise emissions during start-up and shut-down.

Information required by the regulator

15. The operator shall notify the regulator at least 7 days before any periodic monitoring exercise to determine compliance with conditions 1 and 3

16. The results of non-continuous emission testing shall be forwarded to the regulator within 8 weeks of completion of sampling.

17. Adverse results from any monitoring activity (both continuous and non-continuous) shall be investigated by the operator as soon as the monitoring data has been obtained. The operator shall:
    (a) Identify the cause and take corrective action;
    (b) Clearly record as much detail as possible regarding the cause and extent of the problem, and the remedial action taken.
    (c) Re-test to demonstrate compliance as soon as possible; and
    (d) Inform the regulator of the steps taken and the re-test results.

Abnormal events

18. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the operator shall:
    (a) Investigate and undertake remedial action immediately;
    (b) Adjust the process or activity to minimise those emissions; and
    (c) Promptly record the events and actions taken.

19. The regulator shall be informed without delay, whether or not there is related monitoring showing an adverse result:
    (a) If there is an emission that is likely to have an effect on the local community; or
    (b) In the event of the failure of key plant.

20. When requested, by the regulator, the operator shall provide a list of key plant.

21. In cases of non-compliance causing immediate danger to human health, or threatening to cause an immediate significant adverse effect upon the environment, operation of the activity must be suspended. All of the following criteria shall be taken into account:
    (a) The toxicity of the substance being released;
    (b) The amount released;
    (c) The location of the installation; and
    (d) The sensitivity of the receptors.

Raw materials and waste

22. All dusty, potentially dusty and odorous materials, including wastes, shall be stored and handled in a manner to prevent dust or odour from escaping off site.

23. All bulk storage tanks containing solvents shall be located within a bunded area.

VOC control cleaning

24. Cleaning operations involving organic solvents shall be periodically reviewed, normally at least once every two years, to identify opportunities for reducing VOC emissions.

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

Spillages

26. Spillages shall be cleared up as soon as practicable and in a manner to prevent dust and odour escaping off site.

Training

27. All staff whose functions could impact on air emissions from the activity shall receive appropriate training on those functions. This shall include:
    (a) Awareness of their responsibilities under the permit;
    (b) Steps that are necessary to minimise emissions during start-up and shutdown;
    (c) Actions to take when there are abnormal conditions, or accidents spillages that could, if not controlled, result in emissions.

28. The operator shall maintain a statement of training requirements for each post with the functions mentioned in condition 27 and keep a record of the training received by each person. These documents shall be made available to the regular upon request.

Maintenance

29. The operator shall have the following available for inspection by the regulator upon request:
    (a) A written maintenance programme for all equipment in the installation area; and
    (b) A record of maintenance that has been undertaken.

Best Available Techniques

30. 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.

31. If the operator proposes to make a change in operation of the installation, he must, at least 14 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.

Signed:  .....

Head of Community Services

Date: 4 December 2014

GENERAL NOTES

1 Variation

The regulator will ensure that the permit remains up to date in line with the requirements set out in Regulation 20(1) This may involve issuing a Variation Notice following amendment to the Secretary of State's Guidance Notes or following receipt of any direction from the Secretary of State.

2 Review of Conditions

The regulator may at any time undertake a review of the conditions in this permit under Regulation 34(1). Where significant pollution is encountered or where there are changes in BAT or where the operational safety of the activity requires other techniques to be used an immediate review shall be undertaken.

3 Appeal

The permitted operator can appeal in writing to the Secretary of State against the items listed in Regulation 31.

Appeals shall be addressed to:

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

4 Transfer of Permit

The permitted operator who wishes to transfer the whole or part of the permit to a person who proposes to carry out the activity in the holder's place may do so in accordance with Regulation 21. Both the operator and the proposed transferee shall jointly make an application to the regulator to effect the transfer. An application shall include the permit and any fee prescribed in respect of the transfer under Regulation 19 and shall contain the operator's and the proposed transferee's contact details.

5 Variation of Conditions of Permits

Under Regulation 20, the operator may apply to the regulator to vary the conditions contained within the permit. Such application shall be made in accordance with Part 1 of Schedule 5 and shall be accompanied by any fee prescribed in respect of the application under Regulation 19; and paragraphs 8 of Part 1 of Schedule 5 and paragraphs 5(3) and (4) of schedule 5 shall have effect with respect to such applications.

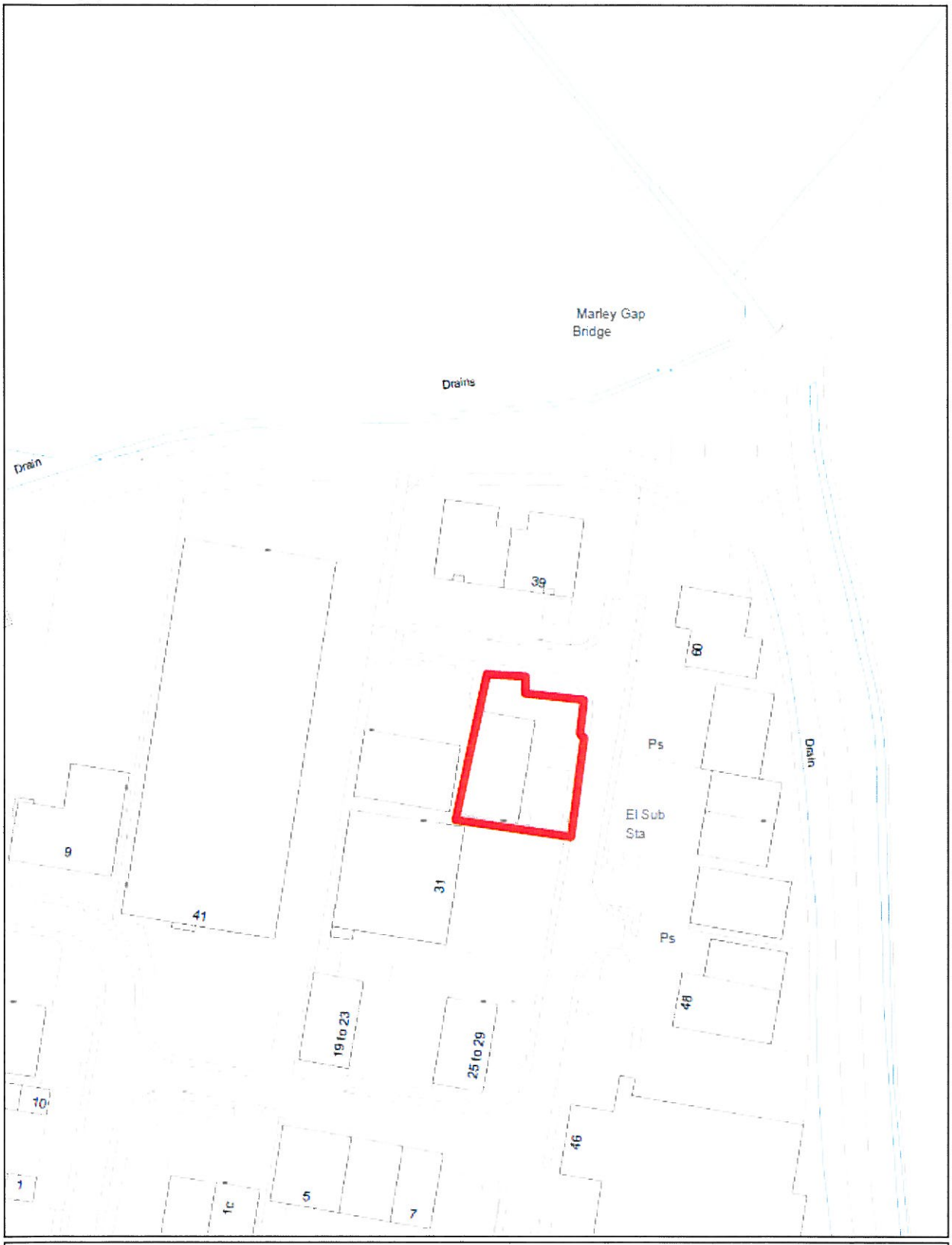
6 Other Legal Requirements

This permit is issued solely for the purpose of the Pollution Prevention and Control Act and its associated Regulations and the operator must ensure that he complies with all other statutory requirements.

7 Annual Subsistence Charge

The Secretary of State has drawn up a charging scheme under Regulation 19. Under this scheme Local Authorities are required to levy an annual subsistence charge related to the permit. The Local Authority will invoice for the amount due which is subject to annual review by the Department of the Environment Food and Rural Affairs.

B04/94 (a) Location plan



Guidance for operators receiving a Variation Notice

(This guidance does not form part of the Variation Notice, but it is for the guidance of those served with the notice.) Further guidance can be found in the PPC General Guidance Manual.

Dealing with a Variation Notice

This notice varies the terms of the permit specified in the Notice by amending or deleting certain existing conditions and/or adding new conditions. The Schedules attached to the notice explain which conditions have been amended, added or deleted and the dates on which these have effect.

The Council may have included a 'consolidated permit', which takes into account these and previous variations. Where a consolidated permit is not included this variation notice must be read in conjunction with your permit document.

Offences

Failure to comply with a Variation Notice is an offence under regulation 38(2) of the 2010 Regulations. A person guilty of an offence under this regulation could be liable to (i) a fine of up to £50,000 or imprisonment for a term not exceeding 6 months or both; or (ii) to an unlimited fine or imprisonment for a term not exceeding 5 years or both, depending on whether the matter is dealt with in the Magistrates or Crown Court.

Appeals

Under regulation 31 and Schedule 6 of the 2010 Regulations operators have the right of appeal against the conditions attached to their permit by a variation notice. The right to appeal does not apply in circumstances where the notice implements a direction of the Secretary of State/Welsh Ministers given under regulations 61 or 62 or a direction when determining an appeal.

Appeals against a Variation Notice do not have the effect of suspending the operation of the Notice. Appeals do not have the effect of suspending permit conditions, or any of the mentioned notices.

Notice of appeal against a Variation Notice must be given within **two months** of the date of the variation notification, which is the subject matter or the appeal. The Secretary of State/Welsh Ministers may in a particular case allow notice of appeal to be given after the expiry of this period, but would only do so in the most compelling circumstances.

How to appeal

There are no forms or charges for appealing. However, for an appeal to be valid, appellants (the person/operator making the appeal) are legally required to provide the Secretary of State or Welsh Minister with the following (see paragraphs 2(1) and (2) of Schedule 6 of the 2010 Regulations):

- written notice of the appeal
- a statement of the grounds of appeal;
- a copy of any relevant application;
- a copy of any relevant environmental permit;
- a copy of any relevant correspondence between the appellant and the regulator;
- a copy of any decision or notice which is the subject matter of the appeal; and
- a statement indicating whether the appellant wishes the appeal to be in the form of a hearing or dealt with by way of written representations.

Appellants should state whether any of the information enclosed with the appeal has been the subject of a successful application for confidentiality under regulation 48 of the 2010 Regulations, and provide relevant details – see below. Unless such information is provided all documents submitted will be open to inspection.

Where to send your appeal documents

Appeals should be despatched on the day they are dated, and addressed to:

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

Or for appeals in Wales:

The Planning Inspectorate
Crown Buildings
Cathays Park
CARDIFF
CF10 3NQ

If an appeal is made, the main parties will be kept informed about the next steps, and will also normally be provided with additional copies of each other's representations.

To withdraw an appeal – which may be done at any time - the appellant must notify the Planning Inspectorate in writing and copy the notification to the local authority who must in turn notify anyone with an interest in the appeal.

Costs

The operator and local authority will normally be expected to pay their own expenses during an appeal. Where a hearing or inquiry is held as part of the appeal process, by virtue of paragraph 5(6) of Schedule 6, either the appellant or the authority can apply for costs. Applications for costs are normally heard towards the end of the proceedings and will only be allowed if the party claiming them can show that the other side behaved unreasonably and put them to unnecessary expense. There is no provision for costs to be awarded where appeals are dealt with by written representatives.

Confidentiality

An operator may request certain information to remain confidential, ie not be placed on the public register. The operator must request the exclusion from the public register of confidential information at the time of supply of the information requested by this notice or any other notice. The operator should provide clear justification for each item wishing to be kept from the register. The onus is on the operator to provide a clear justification for each item to be kept from the register. It will not simply be sufficient to say that the process is a trade secret.

The test of whether information is confidential for the purposes of being withheld from the public register is complex and is explained, together with the procedures, in chapter 8 of the PPC General Guidance Manual.

National security

Information may be excluded from the public register on the grounds of National Security. If it is considered that the inclusion of information on a public register is contrary to the interests of national security, the operator may apply to the Secretary of State/Welsh Ministers, specifying the information and indicating the apparent nature of risk to national security. The operator must inform the local authority of such an application, who will not include the information on the public register until the Secretary of State/Welsh Ministers has decided the matter.