

EP Permit ref: B04/94

Variation ref: PPC 10/08

Variation Notice

From: Huntingdonshire District Council

Council ("the Council")

To: (1)

Linx Printing Technologies Plc
33 Edison Road
St Ives
PE27 3LF

The Council, in the exercise of the powers conferred upon it by regulation 20 of the Environmental Permitting (England and Wales) Regulations 2007 ⁽²⁾ ('the 2007 Regulations') hereby gives you notice as follows-

The Council has decided to vary the conditions of permit reference B04/94 granted under [regulation 17(1) of the Pollution Prevention and Control (England and Wales) Regulations 2000] [regulation 13(1) of the 2007 Regulations] in respect of the operation of the installation/mobile plant at:

Burrel Road
St Ives
PE27 3LA

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 [and by variation notices ref 10/01 and 06/95 is set out in Schedule 2].]

~~[You are hereby required to pay by no later than the sum of £~~
~~the fee prescribed in respect of a variation notice in the relevant charging scheme made under regulation 65 of the 2007 Regulations [and] [or] section 41 of the Environment Act 1995 for LA-IPPC only where there are separate charges in relation to water discharges⁽³⁾.]~~

Signed on behalf of Huntingdonshire District

Council

Dated 27th October 2008

Signed



JA

Designation Head of Environmental & Community Health Services

An authorised officer of the Council

(1) The operator at the address shown on permit / application.

(2) SI 2007/3538

(3) 1995 c.25.

EP Permit ref: B04/94
Variation ref: PPC 10/08

Schedule 1

Variation to the conditions of the permit	Date(s) on which the variation is to take place
All permit conditions	27th October 2008

Signed on behalf of Huntingdonshire District

Council

Dated 27th October 2008

Signed

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Designation Head of Environmental & Community Health Services

An authorised officer of the Council

EP Permit ref: B04/94
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Schedule 2

Permit reference B04/94
variation notices 10/01and06/95

as varied by this notice and

(Insert amended or full consolidated permit).

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 at www.defra.gov.uk/environment/ppc.

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(1) (b) of the 2007 Regulations. A person guilty of an offence under this regulation could be liable to (i) a fine of up to £20,000 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 2007 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 or 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 of 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 (see paragraphs 2(1) and (2) of Schedule 6 of the 2007 Regulations):

- the appropriate authority 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 2007 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.

PERMIT

Pollution Prevention and Control Act 1999

Environmental Permitting (England and Wales) Regulations 2007

Permit Reference No: B04/94

Huntingdonshire District council (the regulator) hereby permits Linx Printing Technologies Plc, Burrel Road, St Ives, Huntingdon, Cambridgeshire, PE27 3LA to operate an 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 Plc
Unit 4
Edison Road
St Ives
Huntingdon
Cambridgeshire
PE27 3LH**

Description of Activity

Linx Printing Technologies plc manufacture and market a range of ink jet printers and various formulations of ink for use with the printers. The solvent content of the inks produced is in the range of 80 - 90%, although some low solvent inks are produced occasionally. The company occupies various units in St. Ives. The ink manufacturing process is as shown on the attached drawing reference number B04/94(a) Location plan.

Batch size quantities of raw materials including pigments, resins, dyes and conductivity agents are weighed into open stainless steel buckets. The weighing activities are carried out in a powder handling booth. The powder handling booth is fitted with a point of source mechanical extraction with internal dust filtration. The powder handling booth extraction system is connected to the Unit's main ducting system.

There are five mixing vessels, two of which have capacities of 1000 litres, one with a capacity of 500 litres and two of a capacity of 200 litres. The two 1000 litre and 500 litre vessels are in fixed locations. There is a single 200 litre vessel connection to which the two mobile 200 litre vessels can be interchanged as required. The vessels are charged with solvents via a pumping system. The solvents used in the process include methyl ethyl ketone (MEK), acetone, TSDA2 (de-natured alcohol), ethyl lactate and diethyl ketone (DEK). The number of mixing vessels in use depends upon the current production requirements. The manway hatches on the mixing vessels are kept closed during the solvent charging

process. The mechanical extract ventilation serving the vessels is also closed during the charging period.

Once charged with the required amount of solvent the mixers are started. The extraction system is then opened. The manway is also opened for the dry powders and resins to be added to the mix. This is via the stainless steel buckets. The dyes are also added through the open manway. The vessel hatches and the mechanical extraction system are then closed and the materials are mixed for approximately 30 minutes.

The resulting mixture (ink) requires quality control clearance before bottling. This is carried out in the QC laboratory. Mechanical extract ventilation is provided in the laboratory. Once the ink has passed quality control it is then pumped to the filling machine via constant level header tanks. The filling machine has two mechanical extract ventilation points. The filled bottles are then conveyed to the capping station, where a single extraction point is located. There is no mechanical extract ventilation provided between the filling and capping operations. After capping the bottles pass through an induction sealer and labelling operation.

A sample quantity of bottles is selected from the batch and taken to the ink test area. The area consists of a number of dedicated print trial machines, in which four can be used at any one time. These machines are used to test all manufactured ink, before the ink is released for sale. The area has point of source mechanical extraction points. The extraction is connected to the Unit's main ducting system.

When the manufactured batch is complete, the line is drained using a dalek (200 litre drum with vacuum pump). Clean solvent is then pumped into the mixing vessel. The solvent is pumped round the pipe system to flush all the pipes and vessel out. The contaminated solvent then is drained using the dalek. Once the dalek is full, the contents are pumped into an external 1000L waste safe. Waste solvent produced at the filling machine through cleaning operations, is disposed in a 200L drum located by the filling machine. The drum has a sealing funnel, to stop stray vapours entering the work place.

The main production room is kept under negative pressure by way of floor mounted mechanical extract ventilation. All extraction points discharge into a ducting system that has a final point of discharge 3 metres above the roof without abatement.

Conditions

Substance		Source	Emission limit/ Provision	Type of monitoring	Monitoring frequency
1	Particulate matter	All ink manufacturing processes	20 mg/Nm ³ as an 8 hour mean. ^{(1) (2)}	Manual extractive monitoring ⁽³⁾	Annually ⁽⁴⁾
2	VOC	All ink manufacturing processes	150 mg/Nm ³ as a 8 hour mean ^{(1) (2) (5)}	Manual extractive monitoring ⁽³⁾	Annually ⁽⁴⁾
3	VOC	All in manufacturing processes	Total consumption	Calculation ⁽³⁾	Annually
4	VOC	All in manufacturing processes	Fugitive emissions	Calculation ⁽³⁾	Once then whenever equipment has been modified

5	VOC	Cleaning operations	Reducing emissions	Audit ⁽³⁾	Every two years.
<p>(1) The reference conditions are 273.15K, 101.3kPa, without correction for water vapour content.</p> <p>(2) The introduction of dilution air to achieve emission concentration limits shall not be permitted. Dilution air may be added for waste gas cooling or improved dispersion where justified, but this shall not be considered when determining the mass concentration of the pollution in the waste gases.</p> <p>(3) Method as described in the Process Guidance Note PG6/44(04) Secretary of State's Guidance for the Manufacture of Coating Materials or subsequent version.</p> <p>(4) Frequency may be reduced if it meets the criteria set out in the Process Guidance Note PG6/44(04) Secretary of State's Guidance for the Manufacture of Coating Materials or subsequent version.</p> <p>(5) VOC emission limit values shall be considered to be complied with if, in one monitoring exercise:</p> <p>(a) The average of all the readings does not exceed the emission limit value</p> <p>(b) None of the hourly averages exceeds the emission limit value by more than a factor of 1.5 (the hourly average of the 30 minutes mean value may be used to demonstrate compliance.</p>					

6. No solvents using the designated risk phases R40, R45, R49, R60 and R61 shall be used.
7. The operator shall notify the regulator at least 7 days before any periodic monitoring exercise to determine compliance with conditions 1 and 2.
8. The results of non-continuous emission testing shall be forwarded to the regulator within 8 weeks of the completion of the sampling.
9. The operator shall keep records of inspections, tests and monitoring. In such cases:
 - Current records shall be kept on site and made available for the regulator to examine.
 - Records shall be kept by the operator for at least two years.
10. Adverse results from any monitoring activity shall be investigated by the operator as soon as the monitoring data has been obtained/ received. The operator shall:
 - Identify the cause and take corrective action.
 - Records as much detail as possible regarding the cause and extent of the problem, and the action taken by the operator to rectify the situation.
 - Re-test to demonstrate compliance as soon as possible; and
 - Notify the regulator.
11. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the operator shall:
 - Investigate immediately and undertake corrective action;
 - Adjust the process or activity to minimise those emissions; and
 - Promptly record the actions taken.
12. In the case of non-compliance causing immediate danger to human health operation of the activity shall be suspended.
13. The regulator shall be informed without delay:
 - If there is an emission that is likely to have an effect on the local community.
 - In the event of the failure of key abatement plant.

14. All releases to air, other than condensed water vapour, shall be free from persistent visible emissions.
15. All emissions to air shall be free from droplets.
16. The process operator shall provide a list of key plant, associated with the ink manufacture, and shall have a written plan for dealing with its maintenance and failure. A record of such maintenance shall be made available for inspection by the regulator.
17. Spares and consumables – in particular, those subject to continual wear – shall be held on site, or shall be available at short notice from guaranteed suppliers, so that plant breakdowns can be rectified rapidly.
18. Stacks and ductwork shall be cleaned to prevent accumulation of materials, as part of the routine maintenance programme.
19. Training of all staff with responsibilities for operating the process/ activity shall include:
 - Awareness of their responsibilities under the permit; in particular how to deal with conditions likely to give rise to VOC emissions, such as in the event of spillage
 - Minimising emissions on start up and shut down.
 - Action to minimise emissions during abnormal conditions.
20. The operator shall maintain a statement of training requirements for each operations post and keep a record of the training received by each person whose actions may have an impact on the environment. These documents shall be made available to the regulator on request.
21. All potentially odorous materials including VOC containing raw materials and wastes shall be stored in suitable closed containers or bulk storage vessels, where appropriate vented to suitable abatement plant.
22. All dusty materials or potentially dusty materials including wastes shall be stored in silos, in confined storage areas within buildings, or in fully enclosed containers/ packaging and handled in a manner that avoids emissions
23. Emissions from mixing vessels, both during mixing and emptying and transfer of materials shall be adequately contained.
24. 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.
25. 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 anyone who handles them are aware of their contents and hazardous properties.
26. 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.
27. Dry sweeping of dusty materials shall not normally be permitted unless there are environmental or health and safety risks in using alternative techniques.

28. Suitable organic solvent contaminated and spillage equipment shall be readily available in organic solvent handling areas.
29. A minimum discharge velocity shall be required in order to prevent the discharge plume being affected by aerodynamic down wash.
30. Stacks or vents shall not be fitted with any restriction at the final opening such as a plate, cap or cowl, with the exception of a cone which may be necessary to increase the exit velocity of the emissions.

Signed: 
Head of Environmental and Community Health Services

Date:

GENERAL NOTES

1 Best available techniques

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

2 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.

3 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.

4 Appeal

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

5 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.

6 Notification of Proposed Change of Operation

If the operator proposes to make a change in operation of the installation, they 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. Change of operation means a change in the nature of functioning, or an extension, of the installation, which may have consequences for the environment.

7 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.

8 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.

9 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.

Best available techniques

Release source	Substance	Control techniques
Storage and handling of organic solvents and materials containing organic solvents	VOC	Use of enclosed mixing and storage vessels
		Siting of storage tanks, Back venting deliveries if needed
		Capture and disposal or capture and destruction
Handling and storage of dusty materials	Particulate matter	Particulate capture if required.
Flue gas	Sulphur dioxide	Limit sulphur in fuel
	Nitrogen oxides	Low NOx burners
	Carbon monoxide	Good combustion
	VOC	Efficient thermal oxidation

B04/94(a) Location plan



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