



Environmental Permit

Pollution Prevention and Control Act 1999

Environmental Permitting (England and Wales) Regulations 2016

***Hanmere Polythene Limited
Blackhorse Road
Letchworth Garden City
Hertfordshire
SG6 1HD***

**Regulated activities:
*Printing flexible packaging***

**Permit Number:
*EPA/00881/03/P2***

Permit Issued by:

North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

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The address for all correspondence in relation to this permit

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| Permit reference | Date | Comment |
|------------------|------------------------------|-----------------|
| 3/1769/14 | 10 th April 2003 | Permit issued |
| EPA/00881/03/P1 | 27 th May 2004 | EPA/00881/03/P1 |
| EPA/00881/03/P2 | 1 st January 2018 | Draft Permit |
| EPA/00881/03/P2 | 25 th May 2018 | Permit Issued |
| | | |
| | | |

Introductory Note

These introductory notes are not Environmental Permit conditions; however they do provide useful information about the Environmental Permitting Regulations:

The following Permit is granted under Regulation 13 and 35 of the Environmental Permitting (England and Wales) Regulations 2016 (S.I 2016 No.1154) as amended, (“the EPR”) to operate an SED activity in Schedule 14 of the EPR, to the extent authorised by the Permit.

Conditions within this Permit detail Best Available Techniques (BAT), for the management and operation of the installation, to prevent, or where that is not practicable, to reduce emissions.

In determining BAT, the Operator should pay particular attention to relevant sections of the LAPPC Process Guidance note (PG6/17(11) – June 2014 revision), and any other relevant guidance. Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Note that the Permit requires the submission of certain information to the Regulator, and in addition, the Regulator has the power to seek further information at any time under Regulation 60 of the EPR Regulations provided that the request is reasonable.

Public Registers

Information relating to Permits, including the application, is available on public registers in accordance with the EPR. Certain information may be withheld from the public registers where it is commercially confidential, or if it is in the interest of national security to do so.

Variations to the Permit

The Regulator may vary the Permit in the future, by serving a variation notice on the Operator. Should the Operator want any of the conditions of the Permit to be changed, a formal application must be submitted to the Regulator (the relevant forms are available from the Regulator). The Status Log includes a summary of the Permits and variations issued up to that point in time and state whether a consolidated version of the Permit has been issued.

Transfer of the Permit or part of the Permit

Before the Permit can be wholly or partially transferred to another Operator, an application to transfer the Permit has to be made jointly by the existing and proposed Operators. A transfer will not be approved if the Regulator is not satisfied that the proposed Permit holder will be the person having control over the operation of the installation, or will not comply with the conditions of the transferred Permit. In addition, if the Permit authorises the Operator to carry out a specified waste management activity, the transfer will not be approved if the Regulator does not consider the proposed Permit holder to be a ‘fit and proper person’ as required by the EPR.

Talking to us

Please quote the permit number if you contact the Regulator about this permit. To give a notification under conditions in this permit, the Operator should use the contact details on the cover of this permit.

Description of the installation and regulated activity

This description of the installation and the regulated activity are not environmental permit conditions, however they do provide useful information about the installation and the activities undertaken. It also provides a reference point in relation to any substantial or non-substantial changes.

Hanmere Polythene Limited manufactures a wide range of polythene bags and sacks.

Polythene products are printed as required using one of 3 6-colour flexographic printing presses:

Omat 2: 6-colour flexographic printing press

Uteco 1: 6-colour flexographic printing press

Uteco 2: 6-colour flexographic printing press

Solvent-based inks are stored and mixed to specification in a dedicated, bunded ink kitchen. Inks are transferred to and connected to the presses in small pots. Additional thinners are added as required to ink trays to maintain the consistency of the ink. The presses are extracted and vented to air without abatement

A bunded IBC of solvent is used for both thinning inks and cleaning activities. Waste solvent is collected and reprocessed for further use in an on-site distillation unit. Waste solvent is held on site before disposal via a licenced waste contractor.

Authorisation



Permit Reference Number:

EPA/00881/03/P2

North Hertfordshire District Council (“the Regulator”) in exercise of its powers under Regulation 13 and 35 of the Environmental Permitting (England and Wales) Regulations 2016 (S.I 2016 No.1154), hereby authorises **Hanmere Polythene Limited** (“the Operator”).

Whose registered office is:

Hanmere Polythene Limited
Blackhorse Road
Letchworth Garden City
Hertfordshire
SG6 1HD

Whose limited company registration number is: **00876107**

To operate an installation at:

Hanmere Polythene Limited
Blackhorse Road
Letchworth Garden City
Hertfordshire
SG6 1HD

The Operator is authorised to carry out the following activities* to the extent authorised by and subject to the conditions of this Permit.

- The use of 5 tonnes or more of organic solvent in any 12-month period in a printing activity (Section 6.4 ‘Coating activities, printing and textile treatments’), and;
- Other rotogravure, flexography, rotary screen printing, laminating or varnishing units > 15 tonnes (Chapter 14 ‘Solvent Emission Activities’).

This Permit shall be subject to replacement, variation or amendment as may be considered appropriate by North Hertfordshire District Council, at any time, according to the provisions of Regulation 20 of the EPR.

* Nothing in this Permit grants or implies any consent under the Town and Country Planning Act.

Signed

Dated this day

25th May 2018

David Carr
Environmental Protection Officer
The Officer Authorised for this Purpose

Conditions

The following are Environmental Permit conditions and are legal requirements.

Installation

1. The activities operated under this permit shall not extend beyond the installation boundary, that being the area outlined in red as shown in the location plan forming Schedule 1 of this permit. Other land owned by the Operator is outlined in blue in that Schedule.

Substantial change

2. 'Existing installation' means an installation in operation on 29 March 1999 or which was granted a permit before 1 April 2001 or the operator of which submitted a complete application for a permit before 1 April 2001, provided that that installation was put in operation no later than April 2002.
3. 'Substantial change' means a change in the nature or functioning, or an extension, of an installation which may have significant negative effects on human health or the environment. Following a substantial change, compliance with the emission limits requirements of this permit must be re-verified.
4. 'Substantial change' also means a change of the maximum mass input of organic solvents by an existing installation averaged over 1 day, where the installation is operated at its design output under conditions other than start up and shut down operations and maintenance of equipment, shall be considered as substantial if it leads to an increase of emissions of volatile organic compounds of more than 10% for pharmaceutical manufacturing solvent emission installations.
5. Where an existing installation undergoes a substantial change, or falls within the scope of the Solvent Emissions Directive for the first time following a substantial change, that part of the installation which undergoes the substantial change shall be treated either as a new installation or as an existing installation, provided that the total emissions of the whole installation do not exceed those that would have resulted had the substantially changed part been treated as a new installation.

Best available techniques

6. 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.
7. 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.

VOC Emission limits, monitoring and other provisions

VOC emission limits

8. The Operator shall report on consumption and compliance with the solvent emission limits of this permit annually. Data shall be reported as follows:
 - a) for the period 1st April to 31st March inclusive, and;
 - b) by 30th April each year, and;
 - c) In accordance with schedule 3 of this permit.
9. If the emission limits of this permit are breached, compliance must be restored within the shortest possible time. For accidents and incidents significantly affecting the environment the Regulator must be notified in accordance with condition 11, and action taken in accordance with conditions 10 and 12. In addition, further possible incidents or accidents must be prevented.
10. The following emission limits provisions shall apply to VOC emissions to air. The selected emission limit(s) shall not be exceeded:

| Row | Parameter | Emission limits |
|-----|------------------------------------|--|
| 1 | Reduction scheme without abatement | Target emission = total mass of solids x 1 |

Non-VOC emission limits

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

Abnormal events

13. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions, including odour, 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.
14. 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 arrestment plant, for example, bag filtration plant or scrubber units.
15. 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 following criteria should be taken into account:
 - a) the toxicity of the substances being released;
 - b) the amount released;
 - c) the location of the installation; and
 - d) the sensitivity of the receptors.

Start up and shutdown

16. The number of start-ups and shut downs shall be kept to the minimum that is reasonably practicable.
17. All appropriate precautions shall be taken to minimise emissions during start up and shut down.

Control techniques

VOC materials designation

18. Designated materials used in industrial emissions Directive installations must be either replaced, or controlled contained and limited, as set out in the table below:

| All Directive installations | |
|--|---|
| 1. Materials designated because of their VOC content: ➤ hazard statement H340, H350, H350I, H360D, or H360F | |
| Requirements: Replace as far as possible (Taking into account guidance under Article 64 of the industrial emissions Directive. See note 3 and Appendix 1) by less harmful substances or mixtures. | Timescale: Installations must comply within the shortest possible time |
| Control under contained conditions as far as technically and economically feasible to safeguard public health and the environment, normally, in accordance with the guidance provided within Section 5 of the note. | Timescale: Immediately (and see note 1 below) |
| Limit - where the sum of the mass flows of all the discharges of all the compounds causing the designated labelling is greater or equal to 10g/h, a limit value of 2mg/Nm ³ for the mass sum of the individual compounds must apply. | Monitoring: Manual extractive testing |
| 2. Materials designated because of their halogenated VOC content: ➤ hazard statements H341 or H351 | |
| Requirements: Control under contained conditions as far as technically and economically feasible to safeguard public health and the environment, normally, in accordance with the guidance provided within Section 5 of the note. | Timescale: Immediately (and see note 1 below) |
| Limit - where the sum of the mass flows of all the discharges of all the compounds causing the designated labelling is greater or equal to 100 g/h, a limit value of 20mg/Nm ³ for the mass sum of the individual compounds must apply. | Monitoring: Manual extractive testing |
| Note 1 - substances or mixtures which are classified after the date of publication of this note as designated materials because of their VOC content, must apply the replace, control and limit requirements above within the shortest possible time from the date at which substances or mixtures became/become designated materials. In determining the "shortest possible time", the operator will need to justify their timetables taking account of the guidance in the relevant chapter of the appropriate Guidance Manual. Note 2 - the European Commission have published information on substituting and containing designated solvents. | |

VOC storage & use

19. All solvent storage areas shall be:
 - a) Clearly identified; and,
 - b) Suitable for the quantity and type of material stored; and,
 - c) Be capable of holding 110% of the capacity of the largest storage container; and,
 - d) Be impervious and resistant to the liquids held in storage.

20. All waste solvent storage areas, shall be:
 - a) Clearly identified; and,
 - b) Suitable for the quantity and type of material stored; and,
 - c) Be capable of holding 110% of the capacity of the largest storage container; and,
 - d) Be impervious and resistant to the liquids held in storage.
21. The preparation and mixing of inks shall only be undertaken in the ink kitchen.
22. Prepared inks shall be transported to the presses in closed containers.
23. Drums shall be sealed unless opened for dispensing solvent or receiving waste solvent.
24. All ink delivery systems shall be contained as far as practicable. This shall include, but not be limited to:
 - a) closed ink transfer systems; and,
 - b) closed containers with well-fitting lids.
25. Residual ink in printing equipment shall be manually or mechanically removed prior to cleaning with solvents.
26. Wherever possible, cleaning shall be carried out using enclosed cleaning systems. Enclosed cleaning systems shall be sealed to prevent emissions whilst in operation.
27. Application of cleaning solvents shall be:
 - a) from a contained device or automatic system when applied directly on to machine rollers; and,
 - b) dispensed by piston type dispenser or similar contained device, when used on rags or wipers.
28. Used rags and wipers shall be stored in suitable closed containers
29. Cleaning operations involving organic solvents shall be periodically reviewed, at least once every two years, to identify opportunities for reducing VOC emissions. The review shall include, but not be limited to:
 - a) the identification of cleaning steps that could be avoided; and,
 - b) alternative cleaning methods; and,
 - c) VOC free or significantly less volatile organic solvents cleaning fluids; and,
 - d) the addition of mechanical, chemical or thermal enhancementsThe Regulator shall be provided with a report on the conclusions of the review.
30. Suitable and sufficient equipment to deal with spillages of VOC containing liquids shall be held on site, including at tanker connection points.
31. A site specific VOC delivery and waste removal procedure shall be maintained.
32. A site specific VOC spillage procedure shall be maintained.

Management

Training

33. All staff whose functions could impact on air emissions from the activity must 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 or spillages that could, if not controlled, result in emissions.

34. 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

35. The Operator shall have the following available for inspection by the Regulator:
 - a) a written maintenance programme for all pollution control equipment; and
 - b) a record of maintenance that has been undertaken.

End of permit conditions.

Interpretations and Explanatory Notes

These interpretations and explanatory notes does not form part of your Environmental Permit conditions, however they do provide useful information about the Environmental Permitting Regulations:

In relation to this Permit, the following expressions shall have the following meanings:

| | |
|--|--|
| <i>“Activity”</i> | An activity listed in Part 2 of Schedule 1 to the EP Regulations which will form part of an EP installation or be a mobile plant |
| <i>“The EPR / EP Regulation”</i> | Means the Environmental Permitting (England and Wales) Regulations 2016 S.I. 2016 No.1154 (as amended) and words and expressions defined in the EPR shall have the same meanings when used in this Permit save to the extent they are explicitly defined in this Permit. |
| <i>“Change in Operation”</i> | In relation to an installation or mobile plant, a change in its nature or functioning or an extension which may have consequences for the environment. |
| <i>“Enforcement notice”</i> | A notice served by a local authority to enforce compliance with the permit conditions or require remediation of any harm following a breach of any condition. |
| <i>“Installation”</i> | A stationary technical unit where one or more activities listed in Part 2 of Schedule 1 to the EP Regulations are carried out and any other location on the same site where any other directly-associated activities are carried out. and any activities that are technically linked. The terms ‘regulated facility’ and ‘installation’ are, in effect, interchangeable for A(2) and B activities. |
| <i>“Operator”</i> | The person who has control over the operation of the installation/regulated facility (EP Regulation 7). |
| <i>“Permit”</i> | A permit granted under EP Regulation 13 by a local authority allowing the operation of an installation subject to certain conditions. |
| <i>“Pollution”</i> | Any emission as a result of human activity which may be harmful to human health or the quality of the environment, cause offence to any human senses, result in damage to material property, or impair or interfere with amenities and other legitimate uses of the environment (EP Regulation 2(1)). |
| <i>“Revocation notice”</i> | A notice served by the Regulator under EP regulation 22 revoking all or part of a permit. |
| <i>“Permitted Installation”</i> | Means the activities and the limits to those activities described in this Permit. |
| <i>“Monitoring”</i> | Includes the taking and analysis of samples, instrumental measurements (periodic and continual), calibrations, examinations, tests and surveys. |
| <i>“MCERTS”</i> | Means the Environment Agency’s Monitoring Certification Scheme. |
| <i>“Fugitive Emission”</i> | Means an emission to air or water (including sewer) from the Permitted installation that is not controlled by an emission limit imposed by a condition of this Permit. |
| <i>“Regulator”</i> | Means any officer of North Hertfordshire District Council who is authorised under Section 108(1) of the Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in Section 108(1) of that Act. |
| <i>“Best Available Techniques (BAT)”</i> | <p>Best available techniques means the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing in principle the basis for emission limit values designed to prevent, and where that is not practical, generally to reduce emissions and the impact on the environment as a whole.</p> <p>For those purposes:</p> <p>"Available techniques" means those techniques which have been developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the cost and advantages, whether or not the techniques are used or produced inside the United Kingdom, as long as they are reasonably accessible to the Operator;</p> <p>"Best" means, in relation to techniques, the most effective in achieving a high general level of protection of the environment as a whole;</p> <p>"Techniques" includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned. Schedule 2 of the Regulations shall have effect in relation to the determination of best available techniques.</p> |

Where any condition of this Permit refers to the whole or parts of different documents, in the event of any conflict between the wording of such documents, the document with the most recent publication date shall be taken to be the most appropriate document to be used.

Any person who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State for Environment, Food & Rural Affairs. Appeals must be received by the Secretary of State no later than 6 months from the date of the decision (the date of the Permit).

Appeals relating to installations in England should be received by the Secretary of State for Environment, Food & Rural Affairs. The address is as follows;

The Planning Inspectorate
Environment Team, Major and Specialist Casework
Room 4/04 – Kite Wing
Temple Quay House
2 The Square
Temple Quay
Bristol, BS1 1PN

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

- (a) A statement of the ground 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 upon one another’s statements).

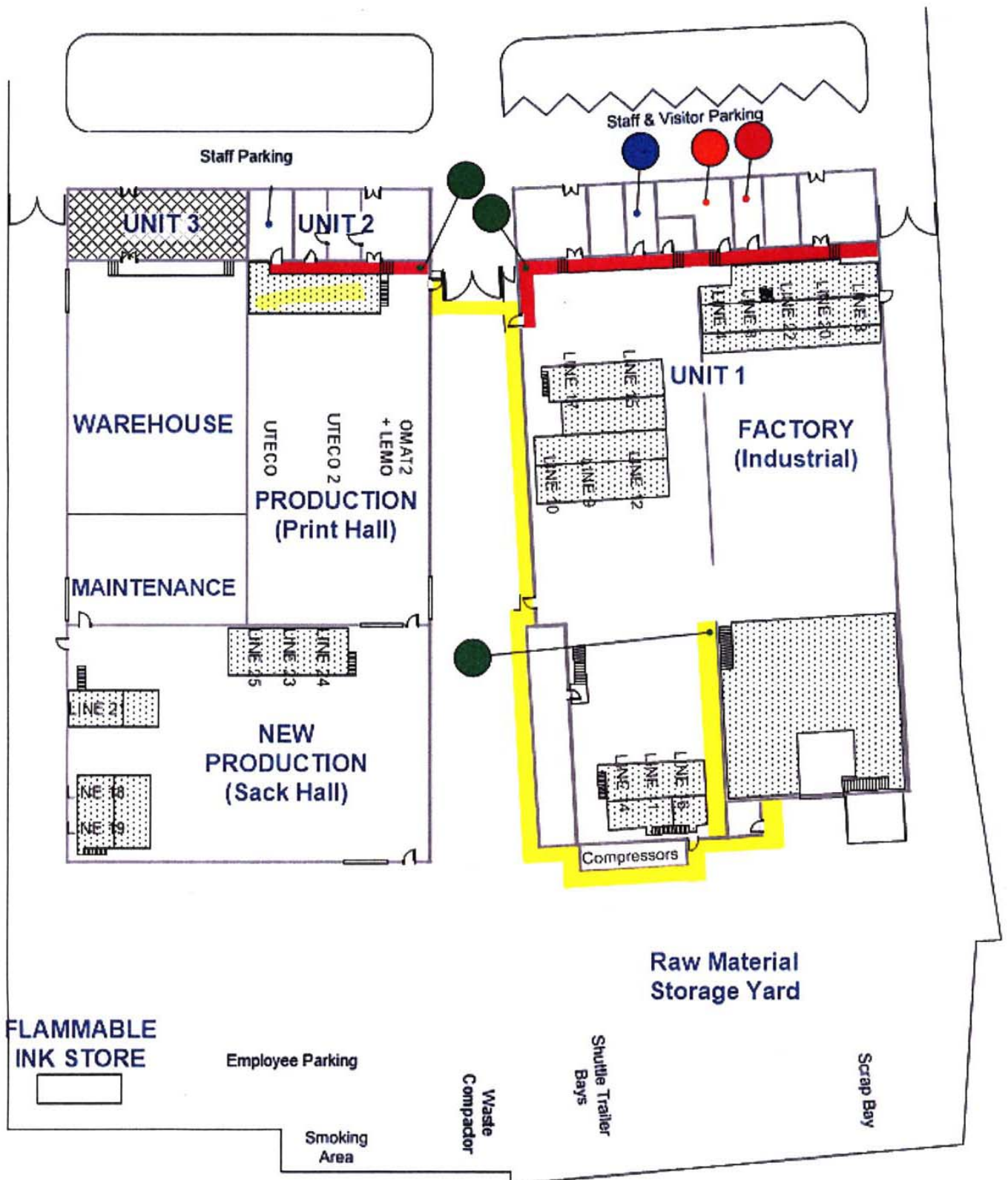
At the same time, the notice of appeal and documents (a) and (e) must be sent to the Council, and the person making the appeal should inform the appropriate Secretary of State that this has been done.

- 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 to either vary any of these conditions or to add new conditions.



| | | | |
|---------|--------------------------------|-------|-----------------|
| Site | Hanmere Polythene Limited | | |
| Project | Location Plan | | |
| Drawing | Schedule 1 | No. | EPA/00881/03/P2 |
| Date | 31 st December 2017 | Scale | Not to scale |

BLACKHORSE ROAD



| | | | |
|---------|--------------------------------|-------|-----------------|
| Site | Hanmere Polythene Limited | | |
| Project | Site Plan | | |
| Drawing | Schedule 2 | No. | EPA/00881/03/P2 |
| Date | 31 st December 2017 | Scale | Not to scale |

Schedule 3

Determination of solvent consumption

the organic solvent consumption is the total mass of organic solvent Inputs minus any solvents sent for reuse/recovery off-site. This is in the form of a mass balance in order to determine the annual actual consumption of organic solvent (C):

$$\text{Where: } C = I1 - O8$$

Solvent management plan

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

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

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.

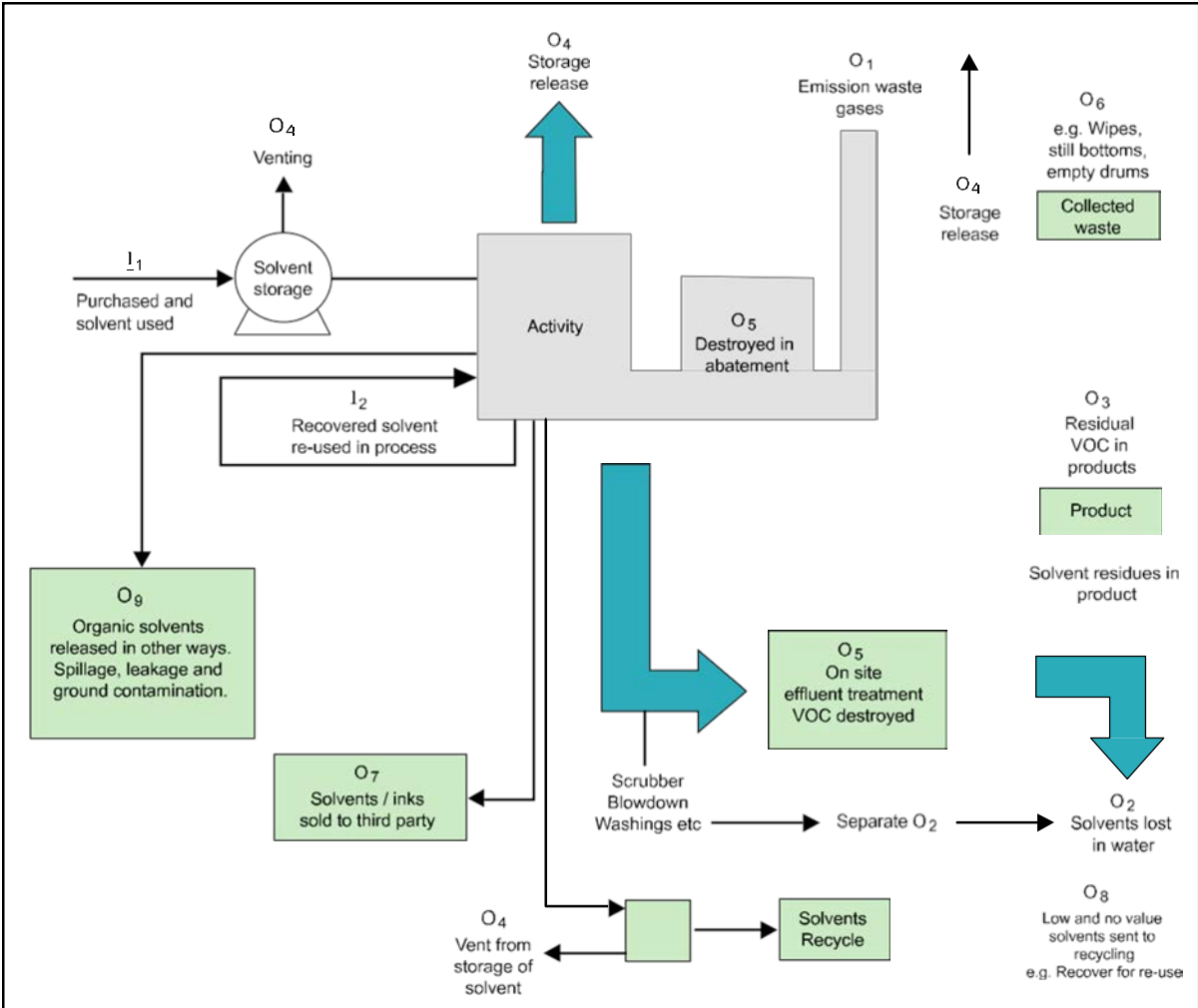
O5 Organic solvents and/or organic compounds lost due to chemical or physical reactions (including for example those which are destroyed, e.g. by thermal oxidation or other waste gas or waste water treatments, or captured, e.g. by adsorption, as long as they are not counted under O6, O7 or O8).

O6 Organic solvents contained in collected waste.

O7 Organic solvents, or organic solvents contained in 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.



Solvent Management Plan

Consumption = $I_1 - O_8$
 Actual solvent emission = $I_1 - O_1 - O_5 - O_6 - O_7 - O_8$
 Fugitive emission (F) = $I_1 - O_1 - O_5 - O_6 - O_7 - O_8$
 OR
 Fugitive emission (F) = $O_2 + O_3 + O_4 + O_9$

Industrial Emissions Directive - solvent emissions activities

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

Total emission = $O_1 + \text{Fugitive emission (F)}$