

CALDERDALE METROPOLITAN BOROUGH COUNCIL
THE POLLUTION PREVENTION AND CONTROL ACT 1999
THE ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS
2016

PERMIT NO EPR/224

Contents

Permit Front Sheet

Description of Installation

Conditions

Emission limits
Monitoring and Measurement of Emissions, and Reporting
Process controls
Management and training

Explanatory Notes

Appeal against Permit Conditions

Plans and Drawings

Plan EPR/224/P1	Site, showing boundary and external features
Drawing EPR/224/D1	internal layout, showing printing machines

Appendices

Minimum Standard for Emissions Monitoring Reports

CALDERDALE METROPOLITAN BOROUGH COUNCIL

THE POLLUTION PREVENTION AND CONTROL ACT 1999

**THE ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS
2016 (as amended)**

PERMIT REFERENCE NO:

EPR/224

Permitted process

The operator named below is hereby permitted to operate an installation for the printing of paper in lithographic heatset web offset printing machinery as set out in Table 1. This process is prescribed for Local Authority regulation under Part B (a) of Section 6.4 of Chapter 6 of Part 1 of Schedule 1 of the above Regulations. It is also a solvent emission (SE) activity.

Operator

Waddington & Ledger Ltd
Lowfields Way
Lowfields Business Park
Elland
HX5 9DA

Company number

00121524

Installation address

Waddington & Ledger Ltd
Lowfields Way
Lowfields Business Park
Elland
HX5 9DA

Table 1: List of equipment associated with releases to air

Description	Reference	Comments
Rotoman Printing Press	P9	Installed 1998
Stork Contiweb Ecotherm afterburner	A5	Serving P9, temperature interlocked

Process description

Waddington & Ledger Ltd operates a single heatset litho offset web printing press in a modern high volume printing installation. Paper for each job is delivered in rolls using a 'just-in-time' order filling system. The paper is loaded into the heatset offset web machine.

In the machine, paper from the mounted rolls (the 'web') passes through a series of printing units, each one applying a differing colour of litho ink. The application of ink involves the use of water based solution to ensure optimum transfer of the image required onto the web. The printed web is then passed through a drying oven. Chilled rollers cool the web before transferring to folding and slitting equipment.

Volatile organic compounds from the drying ovens are passed through thermal oxidising abatement plant and discharged to air. Dust from slitting and folding operations is extracted to a filter system and cyclone arrestment plant, and compressed to form 'briquettes'.

Printing inks are pumped from delivery vehicles into indoor bulk storage tanks, or delivered in drums. Drums of waste ink and solvent are stored in a waste solvent storage compound positioned at the outer edge of the Goods Out yard. Surface water from this area is directed through an oil separator before passing to the off site surface water drainage system.

The installation is a Solvent Emission (SE) installation by virtue of the throughput of materials containing volatile organic compounds (VOCs). Waddington & Ledger will seek to comply with the solvent emissions requirements by meeting point and fugitive emission limits rather than use of the reduction scheme.

Waste materials are collected, sorted and removed from site for disposal or recycling where possible.

Start of permit conditions

Emission Limits to Air

- 1 Emissions of VOCs from the thermal oxidation plant shall not exceed the limit in Table E1 of Condition 6.
- 2 The fugitive emission of solvent from the installation shall not exceed 30% of the mass of solvent input into the installation.

NOTE: solvents remaining in finished products are not considered to be fugitive emissions for this activity.

- 3 Emissions to air, other than steam or condensed water vapour, shall be free from persistent mist and fume.
- 4 Emissions from the rooftop exhaust stack marked A5 on Drawing reference EPR/224/D1 shall be free from visible smoke in normal operation, and emissions shall not in any event exceed the equivalent of Ringelmann Shade 1, as defined in British Standard BS2742:1969.
- 5 The efflux velocity from the rooftop exhaust stack marked A5 on Drawing reference EPR/224/D1 shall not be less than 15ms^{-1} during normal operation except where a lower exhaust speed has been agreed in writing with the Council.

Emission Limits to Air for Specific Pollutants

- 6 The upper limits set out in Table E1 shall apply to emissions to air from the thermal oxidation abatement plant:

Table E1: Emission Limits for Thermal Oxidation Plant		
Emission Point	Pollutant	Concentration (mgm^{-3})
All emission points	VOC as carbon, excluding particulates	50 mgm^{-3} as carbon
All emission points	Carbon monoxide	100 mgm^{-3}
	Oxides of nitrogen as NO_2	100 mgm^{-3}

- 7 The concentrations in Rows 1 and 3 of Table E1 shall be the 30 minute mean during operation of the abatement plant. All concentrations in that Table shall refer to standard conditions of 273K and 101.3kPa, without correction for water vapour content.
- 8 Concentrations of pollutants in emissions recorded during non continuous monitoring shall not exceed the limits in Condition 6.

Monitoring and Measurement of Emissions, and Reporting

- 9 The operator shall produce annually a solvent management plan (SMP) showing the balance of solvent inputs to and outputs from the installation over the normal accounting period 1 July to 30 June. A copy of the SMP shall be submitted annually to Calderdale council within 1 month of the end of the relevant accounting period.
- 10 Adverse results from any monitoring activity, complaints, and any malfunction or breakdown leading to abnormal emissions beyond the installation boundary, shall be investigated as soon as they come to light. The operator shall:
 - a. identify the cause and take corrective action, including adjusting the process to minimise any emissions;
 - b. clearly record the cause and extent of the problem and remedial action taken;
 - c. check that compliance has been restored as soon as possible after the remedial action;
 - d. inform the Council of the steps taken and the results; and
 - e. during the period of investigation undertake and record odour and visual assessments at least once a day until the problem is resolved.If there is likely to be an effect on the local community, the operator shall notify Environmental Health within one hour of the occurrence of the emission.
- 11 Extractive monitoring shall be carried out of the exhaust from the thermal oxidising abatement plant as follows:
 - a) Emissions from point A5 shall be monitored at the request of the Council in the event of persistent odorous or visible emissions.
 - b) Emission point A5 shall each be monitored once in every three year period.
- 12 The operator shall notify the Council seven days before the monitoring required by Condition 11 is to be carried out. The proposed date of the testing, the pollutants to be tested for, and the proposed test methods shall be specified in the notification.
- 13 The results of the monitoring required by Condition 11 shall be sent, in the form of a report, to the Council within 8 weeks of completion of the monitoring. The report shall meet or exceed the standards set out in Appendix 1.

- 14 The assessments required by Conditions 10 shall be recorded in a logbook. The logbook shall be kept at the site and the records shall be retained in the logbook for at least two years after they are made. Records shall include the following details:
- (a) the date and time of the assessment;
 - (b) the result of the assessment;
 - (c) an indication of the weather conditions;
 - (d) any action taken to investigate and correct abnormal emissions; and
 - (e) the name of the person making the assessment.
- 15 The thermal oxidation plant exhausting at point marked A5 on Drawing reference EPR/224/D1 shall be continuously monitored for efficient combustion. Measurements of combustion temperature shall be used as a surrogate measurement for destruction efficiency of VOCs and carbon monoxide.
- 16 Temperature measurements made in accordance with Condition 15 shall be logged electronically in a form suitable for retrieval. Electronic records shall be periodically backed up to ensure that the data availability is at least 95%.

Process Controls

- 17 The internal ink and glue storage tanks marked T1 to T5 on Plan EPR/224/P1 shall be fitted with audible and/or visual alarms to prevent overfilling during deliveries. The operation of the alarms shall be checked before each delivery is made.
- 18 The waste ink drum storage area marked W on Plan EPR/224/P1 shall bear a clear notice stating the nature of the material stored, and all drums and containers stored in that area shall be clearly labelled with the contents.
- 19 Waste ink drums and containers shall be labelled, kept closed, with lids, seals and any valves intact and in place.
- 20 The operator shall maintain documented procedures for dealing with leaks and spills from containers stored in the waste ink drum storage area marked W on Plan EPR/224/P1. A competent employee or employees shall be designated to deal with such occurrences.
- 21 A competent person shall check the temperature interlock systems on press P9 for correct operation on startup. These presses shall not be operated unless the interlock system is functioning.
- 22 The operator shall have in place a procedure for shutting down the printing installation in such a way as to minimise emissions to air. The procedure shall be carried out by designated competent employees, and shall be documented.

- 23 Manual cleaning of presses shall be carried out by dispensing solvent onto wipes from a contained pump dispenser trigger system or other suitable enclosed system.
- 24 Wipes that have been used for cleaning shall be placed into closed containers pending recycling. Used wipes shall be transferred from any container to the flammables storage bin provided for that purpose as soon as the container is full, and containers shall be emptied in any case at least once each week.
- 25 Cleaning techniques involving solvents of low volatility, or water, shall be used wherever practical.
- 26 The condition of developer shall be monitored automatically to ensure that developer is not discarded until it is completely exhausted.
- 27 Residual inks shall be removed by scraping out the ink trays prior to cleaning.

Management and training

- 28 The operator shall implement a written environmental management system concerned, as a minimum, with compliance with the conditions of this environmental permit.
- 29 Staff at all levels shall receive proper training and instruction in their duties relating to control of the installation and emissions to air. Particular emphasis shall be given to training for start-up, shut down and dealing with abnormal conditions. The training shall be recorded.
- 30 The operator shall operate a written schedule of preventive maintenance covering all plant, buildings and equipment concerned with emissions to air. Records shall be kept of all relevant maintenance carried out.
- 31 Essential spares and consumables shall be kept at the installation or be available at short notice from guaranteed sources to rectify breakdowns.
- 32 Any modifications to the processes or equipment used in the installations shall be notified to the Council and approval obtained prior to the modification being undertaken. Notification shall be made at least 14 days before the modification is to take place and shall include a description of the proposed changes.
- 33 In relation to any aspect of the permitted activities, whether or not regulated by specific permit conditions, the operator shall use the best available techniques (BAT) for preventing or, where that is not practicable, reducing emissions from the installation.

End of permit conditions

Signed Date

Andrew Pitts

An Authorised Officer of the Council

EXPLANATORY NOTES

1. **Information used in this permit** This Permit is based upon the information provided in the application received by Calderdale MBC from the operator on 22/2/2011 and on information subsequently received from the operator and placed on the public register. Changes in the operation of the site have lead to the number of presses being reduced (to a single press in 2018). All plant, equipment and processes referred to in this Permit shall be taken to refer to those described in the original application and in the additional information.

Record of changes to permit EPR/224		
Date	Event	Notes
22/3/11	Part B permit issued	Effectuated by variation of partially surrendered A2 permit IPPC/TM1
10/8/11	Permit varied	Updates process description and monitoring requirements
13/12/12	Permit varied	Removal of press 3
28/8/14	Permit varied	Removal of presses 4 and 7, IED and updated statutory guidance.
17/8/2015	Permit varied	Regulator initiated, corrections and simplification
22/03/2018	Permit variation	Presses 8 and 10 removed

2. **Contaminated wipes** Wipes and cloths that have been contaminated with solvent may pose a risk of spontaneous combustion when stored in bins. Advice on this issue may be obtained from the Health and Safety Executive.
3. **Health and safety** This Permit is given in relation to the requirements of the Environmental Permitting (England and Wales) Regulations 2016 (as amended). It must not be taken to replace any responsibilities the operator may have under workplace Health and Safety Regulations.
4. **Other legislation** This Permit does not detract from any other statutory requirement, such as the need to obtain planning permission, building regulation approval, hazardous substances consent, discharge consents, waste disposal licence or any licence or consent from the Environment Agency.
5. **Subsistence fee** The annual subsistence fee is due on 1 April each year. Failure to pay the fee will lead to revocation of the Permit.
6. **Guidance used** The Council has had regard to the June 2014 update of The Secretary of State's Process Guidance Note 6/16(11) in determining the conditions of this permit.
7. **Variation of conditions** The operator may apply for a variation to the conditions of this permit. If the application results from a substantial change to the installation (as defined in the regulations) then a fee will be payable.

8. **Surrendering this permit** The operator may surrender this permit in whole or in part in the event that the installation ceases to operate. There is no fee for surrendering the permit in whole.
9. **Transferring this permit** The operator may, on joint application with another proposed operator, apply to transfer this permit to the proposed operator. A fee will be payable in this case.
10. **More information** Application forms and more information about environmental permitting can be found on the Council's website www.calderdale.gov.uk.
11. **Public register** This Permit is a public document and is kept on a Public Register for inspection by any member of the public.

Contacting Calderdale MBC Environmental Health

All enquiries and notifications made in relation to this Permit should be made to:

Calderdale MBC
Environmental Health
c/o Town Hall
Crossley Street
Halifax
HX1 1UJ

Tel: 01422 288001

Email: environmental.health@calderdale.gov.uk

Outside office hours Incidents occurring outside office hours shall be reported on the next working day unless otherwise directed within the Permit or there is an imminent risk to health which shall be reported immediately by telephoning **01422 288000** and asking for the Out of Hours Officer.

Press P9

A5

Press Room, Waddington and Ledger Ltd