

## Environmental Permit

Environment Protection Act (CAP. 549)

Permit number

**EP 0091/19**

Approved Documents

**EP 091/19/DOC1**

The Environment and Resources Authority (hereinafter the Authority; the Competent Authority or ERA) in exercise of its powers under the Environment Protection Act (CAP. 549) and applicable subsidiary legislation referred to in this permit, hereby authorises:

**Mr. John Scott obo Crane Currency Malta Ltd.** (hereinafter “the Operator” or “the Permit Holder”), Of Whose Registered Office (or principal place of business) is at

**Crane Currency Malta Ltd.**

**HHF 402 Hal Far Industrial Estate,**

**Birzebbugia, Hal Far, BBG 3000**

(Company registration number: **C78450**)

to operate an installation at:

**Crane Currency Malta Ltd.**

**HHF 402 Hal Far Industrial Estate,**

**Birzebbugia, Hal Far, BBG 3000**

to the extent authorised by and subject to the conditions of this Permit.

This permit is valid for **four (4) years** from the date below. An application for renewal of this permit is to be submitted at least six months prior to expiry of this permit.

Signed	Date
<p data-bbox="379 1883 568 1942">Prof. Victor Axiak Chairman</p>	<p data-bbox="879 1883 1145 1912">Permit Issued: 07/12/19</p>

**Authorised to sign on behalf of the Competent Authority**

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## Conditions

### 1 General

The Permitted Installation shall, subject to the conditions of this Permit, be managed, controlled and operated as described in the EP Application, or as otherwise previously agreed in writing by the Authority.

#### 1.1 Status Log

Detail	Date
<i>EP application</i>	07 <sup>th</sup> August 2017
<i>Permit Issued</i>	07 <sup>th</sup> December 2017
<i>Renewal Request</i>	05 <sup>th</sup> July 2019
<i>Renewal granted by Board</i>	29 <sup>th</sup> November 2019

#### 1.2 Permitted Activities

1.2.1 The Operator is authorised to carry out the activities and the associated operations specified in Table 1.2.1.

<b>Table 1.2.1</b>		
<b>Activity</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
Production of banknotes	Printing (non-publication rotogravure, sheet off-set, rotary screen and varnishing) and finishing, including associated processes such as plate making, and packing.  (Activity 18.12 according to EC Regulation 1893/2006).	From receipt of raw materials and chemicals to packaging and dispatch of finished product.
Associated activity of utilities	Waste water management (Wiping Solution Preparation & Recovery plant).	From generation of waste water effluents to treatment and discharge to public sewer.
	Waste Treatment ("Hunkeler" System – Briquette and Granulator)	From generation of waste to treatment and removal from site by authorised waste carriers/brokers.
	One emergency diesel generator to produce energy.	From receipt of fuel to delivery of utility.
Associated activity of storage, treatment and disposal/recycling of waste materials generated on site	Handling, storage, treatment and disposal/recovery of wastes.	From generation of waste to recovery onsite and/or disposal offsite at permitted facilities.
Associated activity of maintenance	Maintenance and repairs which may be carried out in the installation.	From maintenance/repair activity to appropriate recovery/disposal of any waste generated on site.

### **1.3 Site**

- 1.3.1 The activities authorised under condition 1.2.1 shall not extend beyond the Site boundary, as per Site Map in Schedule 5 to this Permit, and the authorised layout plans as defined in approved documents **EP 0091/19/DOC1**.

### **1.4 General Conditions**

- 1.4.1 The conditions and obligations of this permit are without prejudice to any other regulation, code of practice, conditions or requirements requested by other Authorities or entities, including but not limited to, the Planning Authority, the Occupational Health and Safety Authority, Transport Malta, and the Regulator for Energy and Water Services (REWS).
- 1.4.2 This permit is granted saving third party rights. The Permit Holder is not excused from obtaining any other permission required by law.
- 1.4.3 A copy of this Permit including any Variation Notice and amendments to it shall be available at the place of work, at all times, for reference by all staff carrying out work subject to the requirements of the Permit.
- 1.4.4 All persons have a duty of care to protect the environment. The Permit Holder shall become familiar with his legal obligations and good environmental practice.
- 1.4.5 The site shall be maintained in a tidy condition, free from litter and waste (whether arising from own activities or external sources).
- 1.4.6 The Site must be well secured at all times.
- 1.4.7 The Permit Holder has the sole responsibility to ascertain compliance with legal obligations, permit conditions and to undertake activities on and off site in line with good environmental practices at all times.
- 1.4.8 All plant, equipment and technical means used in operating the Permitted Installation shall be maintained in good operating condition and without causing polluting emissions, leaks and spillages. The permit holder shall keep maintenance records as specified in Section 3 of this Permit.
- 1.4.9 The printing and associated equipment is to be installed and operated in accordance with the manufacturer recommendations, so as to minimise the release of volatile organic compounds to air, land and water.
- 1.4.10 The Permitted Installation shall be managed, controlled, supervised and operated by staff that are aware of the importance of environmental protection and suitably trained on the requirements of this Permit. All staff shall be provided with adequate training and written operating instructions to enable them to effectively carry out their duties. Such training shall be recorded and maintained in line with Condition 3.3.
- 1.4.11 The Authority may request additional monitoring and/or review of the operational practices and commission audits on the installation as deemed necessary to address any circumstances that may affect the quality of the surrounding environment. Any required monitoring and/or audits shall be carried out at the expense of the Permit Holder. The Authority may carry out regular compliance checks that vary in frequency according to the site's compliance with the permit conditions. Any checks or audits carried out by the Authority may be made at the Permit Holder's financial expense.
- 1.4.12 Without prejudice to condition 1.4.11, the authority may take any action deemed necessary including but not limited to the suspension of any activity/operation until investigations are concluded.

- 1.4.13 The Authority's representatives may inspect and photograph any part of the site and ask for any closed or locked areas to be opened and may demand to be provided with any proof, documentation, plans, receipts or any other records.
- 1.4.14 The Authority may add, amend, delete or substitute any of the conditions of this permit after notifying the Permit Holder of its intention and after describing the changes to the Permit Holder. This is without prejudice to any prevailing circumstances that would preclude the Authority from following such a procedure.
- 1.4.15 The permit is valid for a period of four (4) years from the date of granting. The Permit Holder is able to renew the permit upon application with the Authority expressing his/her intention at least six (6) months prior to the expiry of this permit. The permit will be considered renewed once the official renewed permit is issued by the Authority.
- 1.4.16 The permit is issued against a Bank Guarantee of €8,850 which shall be renewed annually. This guarantee will have to be maintained throughout the validity of the permit. Following renewal and/or variations to this permit, the Authority may require amendments to the Bank Guarantee.
- 1.4.17 The Authority may take part or all of the bank guarantee if the Permit Holder fails to take necessary action or fails to fulfil his legal obligations under the Act or its subsidiary legislation thereof, in cases of non-compliance with these permit conditions, or in cases where environmental integrity is threatened. This bank guarantee is without prejudice to any environmental liabilities incurred by the permit holder through failure to adhere to permit conditions or any other works/ activity carried out on site. Should the Authority forfeit the Bank Guarantee either in part or in full, the Permit Holder shall ensure that this is replenished without undue delay, in any case not exceeding 2 months from the date of forfeiture.
- 1.4.18 In cases where the bank guarantee does not cover the expenses incurred by the Authority to take remedial action on the Permit Holder's behalf, the Permit Holder is to financially reimburse the Authority of all the expenses incurred within.
- 1.4.19 The Authority may suspend or revoke this environmental permit in line with the provisions of CAP549.
- 1.4.20 Upon the joint application of a Permit Holder and a proposed transferee, the Permit Holder may request to transfer an environment permit. The permit shall not be transferred from the Permit Holder without prior approval from the Authority. Upon the Authority's decision to transfer the permit to the transferee, all rights, obligations, liabilities shall subsist onto the transferee.

## **1.5 Operational Changes**

- 1.5.1 The Permit Holder may apply for a variation in permit and shall seek the Authority's written agreement prior to any operational changes, by sending to the Authority:
- a. Written notice of the details of the proposed change, including an assessment of its possible effects (including changes in emissions and waste production) on risks to the environment from the Permitted installation;
  - b. Any relevant supporting information (e.g. chemical/fuel consumption, technical details, changes in the type/use of substances/mixtures, etc.);
  - c. Any relevant supporting assessments and drawings, and;
  - d. The proposed implementation date.
- 1.5.2 Any such change, shall only be implemented following the issue of a variation of the permit by the Authority.

- 1.5.3 The Permit Holder shall give written notification as soon as practicable prior to any of the following:
- cessation of operation of part or all of the Permitted Installation for a period likely to exceed 1 year; and
  - resumption of the operation of part or all of the Permitted Installation after a cessation notified under condition 1.5.3 part a.
- 1.5.4 The Permit Holder shall notify the following matters to the Authority in writing at least 10 working days prior to their occurrence:
- any change in the Permit Holder's trading name, registered name or registered office address;
  - any change to particulars of the Permit Holder's corporate identity.

## 2 Operating Conditions

### 2.1 Emissions to Air

- 2.1.1 All processes which generate significant levels of airborne contaminants (such as dusts, gases, odorous chemicals) shall have effective local collection and shall discharge (after treatment where necessary) through a stack or vent located and/or designed in such a way as to avoid local effect.
- 2.1.2 Emissions to air shall only arise from the emission points specified in Table 2.1.1, as per approved document EP 0091/19/DOC1.

<b>Emission point references<sup>1</sup></b>	<b>Source</b>
PS1	Varnishing Machine 1
PS2	Varnishing Machine 2
PS4	Offset Machine 1
PS5	Offset Machine 2
PS7a-e	Nota Screen Machine 1
PS8a-d	Nota Screen Machine 2
PS9	D60 Wash Machine
PS10	Roller Coater
PS11	Numbering Boxes
PS12	Ink Mixing
PS13	Wiping Solution
PS14a-h	Laboratory venting
PS15 a-e	Air handling units
PS17	Generator
PS18 a-c	OptiNota (H)
PS19 a-d	NotaNumber
PS 20	Roller Room

- 2.1.3 ERA recommends that diesel (gas oil) used for generators and boilers shall have a Sulfur content not greater than 0.1%.

<sup>1</sup> According to Section 7 of the application dated 05/07/19.

2.1.4 Only diesel (gas oil) shall be utilised as a source of fuel for the generators and the co-incineration of any material or additional fuel including engine or other waste oil is strictly prohibited. Any change in fuel type shall require the notification and approval of the Authority prior to commencement of its utilisation.

2.1.5 The limits for emissions to air for the parameters and emission points set out in Tables 2.1.2 shall not be exceeded. The limits are defined at a temperature of 273,15 K, a pressure of 101,3 kPa and at a standardised O<sub>2</sub> content of 3%.

<b>Table 2.1.2 : Emission limits to air and monitoring</b>		
<b>Emission point reference</b>	<b>Parameter</b>	<b>Limit</b>
PS1	Volatile Organic Compounds	100 mgC/Nm <sup>3</sup>
PS2		
PS4		
PS5		
PS7		
PS8		
PS12		
PS13		
PS19		
Fugitive emissions from printing activities	Volatile Organic Compounds	25% of solvent input
PS 17	Carbon Monoxide	-
	Oxides of Nitrogen	250mg/m <sup>3</sup>

2.1.6 Every 195 hours of operation, the Permit Holder shall submit a certification for the emissions from PS17 referred to in Table 2.1.2 from an independent warranted engineer. The certification shall be submitted as part of the Annual Environmental Report (AER) with the first measurement taken within four months of the granting of the permit. The Authority reserves the right to require an increase in the frequency of such measurements.

2.1.7 The certification shall include measurement of Nitrogen oxides and carbon monoxide. During each measurement, the plant shall be operating under stable conditions at a representative even load. In this context, start-up and shutdown periods shall be excluded.

2.1.8 Should the Permit Holder intend to install equipment which could lead to additional emissions to air (e.g. boiler, etc.), a variation of this Permit must be secured prior to installation and operation of this equipment.

2.1.9 Industrial combustion plants (e.g. boilers, generators, etc.) shall comply with the provisions of S.L. 549.122 (Limitation of emissions of certain pollutants into the air from medium combustion plants regulations) and any other applicable subsidiary legislation.

2.1.10 The exhaust from general building ventilation (e.g. extractors or fans in walls or roofs) shall be vented in such a way as to avoid adverse environmental effects.

2.1.11 All abatement equipment and ducting shall be cleaned and maintained on a regular basis (as per manufacturer specifications). Records of such cleaning/maintenance shall be kept on site, for at least four years, for inspection by the Competent Authority.

2.1.12 The Permit Holder shall prevent or where that is not practicable, minimise fugitive emissions of substances to air from the Permitted Installation.

- 2.1.13 The limits for VOC emissions to air for the parameters and emission points listed in Table 2.1.2, shall be compliant with the Reduction Scheme as per Schedule V of SL549.79 Industrial Emissions (Limitation of Emissions of Volatile Organic Compounds) Regulations, 2013 or as quoted in subsequent amendments.
- 2.1.14 The annual total solvent emissions are to be calculated in accordance with the guidance provided in Schedule IV of the legislation, and shall take account of all organic solvents used within the installation, including raw materials used in the printing process and solvent used for cleaning the equipment.
- 2.1.15 Gas volumes may be added to the waste gas for cooling or dilution purposes where technically justified but shall not be considered when determining the mass concentration of the pollutant in the waste gas.
- 2.1.16 Operations must be carried out in such a manner that total emissions of organic solvents from the installation, as measured and reported annually, do not exceed the target emissions determined according to the requirements of the Reduction Scheme in Schedule V of the legislation. The monitoring test is to be carried out using the EN standard EN 12619:2013 as updated or any other equivalent standard which the Authority approves in writing. At least three readings shall be obtained during each measurement exercise. The Authority may request in writing further additional tests should the Authority feel that this is necessary, in order to ensure compliance with S.L. 549.79 or as quoted in subsequent amendments.
- 2.1.17 The Permit Holder shall carry out continuous monitoring of emissions to air for the emission points listed in table 2.1.2, excluding PS17, only if the stacks to which abatement equipment is connected, emit more than an average discharge of 10kg/hr of total organic carbon. Should emissions be less than 10kg/hr of total organic carbon, the Permit Holder shall carry out periodic measurements.
- 2.1.18 This permit does not authorise the use of substances and preparations which because of their content of volatile organic compounds, are classified as carcinogens, mutagens, or toxic to reproduction, and are assigned or need to carry the hazard statements H340, H341, H350, H350i, H351, H360D or H360F than those included in the submitted EP Application<sup>1</sup>.
- 2.1.19 Further to condition 2.1.18, emissions of VOCs, which are assigned the hazard statements H340, H350, H350i, H360D or H360F, where the mass flow of the sum of the compounds causing the labelling H340, H350, H350i, H360D or H360F is greater, or equal to 10g/h, an emission limit value of 2mg/Nm<sup>3</sup> shall be complied with.
- 2.1.20 Further to condition 2.1.18, emissions of VOCs, which are assigned the hazard statements H341 or H351, where the mass flow of the sum of the compounds causing the labelling H341 or H351 is greater, or equal to 100g/h, an emission limit value of 20mg/Nm<sup>3</sup> shall be complied with.
- 2.1.21 Pollutant concentrations in emissions referred to in condition 2.1.19 shall be determined according to PD CEN/TS 13649:2014 or equivalent.

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<sup>1</sup> Application for renewal and variation submitted on 05/07/19 and all attached documentation.



2.1.22 The emission limit values in conditions 2.1.19 and 2.1.20 shall be considered complied with if, in one monitoring exercise:

- a. the average of all readings does not exceed the emission limit values, and
- b. none of the hourly averages exceeds the emission limit value by more than a factor of 1.5.

Compliance shall be verified on the basis of the sum of the mass concentrations of the individual volatile organic compounds concerned. Gas volumes may be added to waste gases for cooling or dilution purposes but shall not be considered when determining the mass concentration of the pollutant in the waste gas.

2.1.23 In accordance with the provisions of Regulation 8 (2) of S.L.549.79, Industrial Emissions (Limitation of Emissions of Volatile Organic Compounds) Regulations, 2013 the limits for VOC emissions to air for the emission points listed in table 2.1.2, excluding PS17, shall be considered to be complied with if in one monitoring exercise:

- a. the average of all readings does not exceed the emission limit values, and
- b. none of the hourly averages exceeds the emission limit value by more than a factor of 1.5.

2.1.24 Under abnormal operating conditions such as in the case of breakdown, the Permit Holder shall reduce or close operations as soon as practical until normal operation can be restored.

2.1.25 In the event of abnormal emissions, malfunction or breakdown leading to abnormal emissions, the Operator must:

- a. Investigate immediately and undertake corrective action, and
- b. Adjust the process or activity to minimise those emissions, and
- c. Record the events and actions taken.

2.1.26 Further to condition 2.1.27, the Permit Holder shall provide ERA with details of the specific cause of the malfunction through the submission of filled in copy of Schedule 5 and the remedial steps taken or to be taken to address the malfunction.

2.1.27 The Permit Holder shall submit certification by an independent warranted engineer showing that the combustion plants are in good working condition. This certification shall include the boilers and the generator referred to in Table 2.1.2. The certifications shall be submitted every 3 years as part of the Annual Environmental Report (AER).

2.1.28 The Permit Holder shall use the best possible practice so as to prevent or where that is not practicable to reduce fugitive emissions of substances to air from the Permitted Installation to levels which are not a public health or environmental hazard.

## **2.2 Effluent discharges**

2.2.1 The operations of the installation shall not hinder the achievement of good status for surface and groundwater as required under the Water Policy Framework Regulations, S.L. 549.100, as amended.

2.2.2 The operator shall not allow the introduction into groundwater of any substance included in the Regulations for the Protection of Groundwater against pollution and deterioration (S.L. 549.53). The operator shall also not allow any discharges to groundwater for substances other than those specified in the Regulations unless specifically permitted by the Malta Resources Authority.

2.2.3 No discharges to surface waters, groundwater shall take place at the installation.

- 2.2.4 Process effluents shall not be diluted prior to transfer off-site.
- 2.2.5 Foul sewer drains must be strictly segregated from storm water drains.
- 2.2.6 Rainwater shall be segregated from all process areas that are potentially contaminated with raw materials, intermediates and/or products. If this is not possible, rainwater from areas where contamination by oil or chemicals is likely (such as loading/unloading and bunded areas) shall be contained as directed by the Authority.
- 2.2.7 All process and storage areas must be appropriately contained. Any accidental release of substances shall be duly treated prior to discharge into the sewers, or disposed/recovered to the satisfaction of the Authority if treatment does not enable compliance with emission limit values in the Sewer Discharge Permit.
- 2.2.8 The butterfly valve within the storm-water inspection chamber shall be kept closed at all times during loading/unloading activities of chemicals and hazardous waste within the outdoor areas. Each valve closing and opening shall be recorded. If during the valve opening, visible contamination of the inspection chamber is observed, such material shall be collected and disposed of as hazardous waste prior to opening of the valve.
- 2.2.9 Oil/water interceptors shall be inspected by an independent warranted engineer at least once every year, and shall amongst other things inspect the interceptor for efficiency of operation. The last valid engineer's certificate indicating efficiency of operation shall be submitted as part of the Annual Environment Report.

### **2.3 Waste**

- 2.3.1 All operations concerning the management of waste are subject to Subsidiary Legislation 549.63, Waste Regulations and Subsidiary Legislation 549.45, Waste Management Activity (Registration) Regulations.
- 2.3.2 All wastes shall be stored within a designated and controlled storage area(s) prior to ultimate disposal.
- 2.3.3 Wastes to be recycled shall be stored in a designated container or area and shall not be mixed with other wastes.
- 2.3.4 Liquid and/or hazardous wastes shall be stored in labelled, closed containers within the designated and controlled storage areas prior to ultimate disposal. Wastes of different natures and having different European Waste catalogue codes as established by Commission Decision 2000/532/EC and any subsequent amendments shall not be mixed in the same container.
- 2.3.5 Packaging material which came into contact with hazardous substances shall be regarded as hazardous waste and shall be stored and disposed of in an appropriate manner.
- 2.3.6 Solvent-contaminated waste, such as still residue, filters and filter powders, shall be stored in sealed containers in a designated bunded area prior to disposal and considered as hazardous waste unless proven otherwise to the satisfaction of the Authority.
- 2.3.7 No storage of waste, equipment or materials is permitted on property outside the permitted boundary.
- 2.3.8 No storage of waste destined for disposal is permitted for a period exceeding 12 months, and storage of waste destined for recovery is not permitted for a period exceeding 3 years.
- 2.3.9 On-site disposal of wastes by any means including burning, disposal to drain or surface water, burying or deposition on land is prohibited, unless specifically approved through a Variation of this Permit.

- 2.3.10 Transboundary movement of waste shall be carried out in accordance with the following regulations, as amended from time to time:
- a. Regulation (EC) N° 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste;
  - b. Commission Regulation (EC) N° 1418/2007 of 29 November 2007 concerning the export for recovery of certain waste listed in Annex III or IIIA to Regulation (EC) N° 1013/2006 of the European Parliament and of the Council to certain countries to which the OECD Decision on the control of transboundary movements of waste does not apply; and
  - c. Any other applicable legislation.
- 2.3.11 The Permit Holder shall make use of the services of a registered waste carrier for the transport of waste from the site in accordance activity 38 of schedule 1 of Subsidiary Legislation 549.45, the Waste Management (Activity Registration) Regulations. Where the company removes wastes using its own transport the vehicle(s) must also be registered as a waste carrier in accordance with S.L. 549.45 or any statutory provisions or regulations amending or replacing them.
- 2.3.12 Where relevant, the Permit Holder shall make use of the services of a registered waste broker in accordance with S.L. 549.45.
- 2.3.13 Packaging and containers containing significant residual quantities of chemicals shall be regarded as hazardous waste and stored in dedicated waste management areas.
- 2.3.14 Producers of packaging shall register with ERA and provide the required information, as well as achieve the targets as set out in S. L. 549.43, Waste Management (Packaging and Packaging Waste) Regulations. Documentation as evidence of such should be maintained for a period of 3 years and be made available, upon request by ERA.
- 2.3.15 Movement of hazardous waste to authorised facilities shall be covered by a valid consignment permit obtainable from the Competent Authority. Each movement shall also be covered by a consignment note obtainable from the Authority.
- 2.3.16 The Permit Holder shall ensure to keep records for every consignment of hazardous wastes, or other wastes, as deemed necessary by the Authority, removed from the Site indicating the EWC Code, description, quantities, date of removal, contractor name (including for transport), consignment note number (where applicable) and manner and place of final disposal/recovery.
- 2.3.17 Waste generated from the water solution preparation and recovery plant including waste fine powder and waste wiping solution is to be considered as hazardous waste and disposed of accordingly unless proven otherwise by an accredited third party laboratory in accordance with EN ISO 17025:2017 to the satisfaction of ERA. The following standard is to be utilized for the basic characterization of waste to determine the total content in the material (mg/Kg): *EN 14899:2005 Characterization of waste. Sampling of waste materials. Framework for the preparation and application of a sampling plan.*
- 2.3.18 Any waste characterisation is to be carried out at a laboratory accredited to EN ISO/IEC 17025 or equivalent standard methods. Following submission of these results, the Authority may require further testing in order to determine the appropriate waste disposal locations.
- 2.3.19 Disposal certificates shall be kept on record and made available for inspection for a period of at least 4 years from date of their issue.
- 2.3.20 The Permit Holder shall notify the Authority once every year, as part of the AER, the total quantity of recovered solvent that is re-utilised in the installations' operations.

## **2.4 Storage**

- 2.4.1 All bulk fuel storage tanks shall be provided with an adequately designed bund system with an impermeable base and walls. The capacity of the bund shall be a minimum of 110% of the largest tank within the bund or 25% of the total volume of all the tanks within the bund, whichever is greater. All filling and off-take points shall be located within the bund. The Permit Holder shall also ensure and take all precautions to avoid any leakages or spills from liquid or solid material.
- 2.4.2 The Authority may request that bunds on site are tested and certified to be leak-proof by an independent, warranted architect or engineer.
- 2.4.3 Drums and containers of solvents, oils or any other chemicals shall be stored in designated and secure storage areas. Storage areas shall be bunded or otherwise designed so that surface and ground waters cannot be contaminated by spillages.
- 2.4.4 Chemicals of different properties shall be stored and handled as specified in respective MSDS sheets. Such sheets shall be made available and accessible to personnel responsible for the management of the storage areas and for inspection by the Competent Authority. Incompatible chemicals shall not be stored within the same bund.
- 2.4.5 Spillages of fuels, chemicals or other hazardous material shall receive immediate attention to prevent escape to drain, surface water or land. Spilled material shall be disposed of in an appropriate manner. Kits for the collection of liquid and powder spills shall be available on site at strategic locations.

## **2.5 Ozone Depleting Substances and Fluorinated Greenhouse Gases**

- 2.5.1 No new equipment or components containing substances falling within the scope of EC Regulation No. 1005/2009 on substances that deplete the Ozone Layer & Subsidiary Legislation 549.58 Substances that deplete the Ozone Layer, regulations, shall be installed within the site.

## **2.6 Accident prevention and control**

- 2.6.1 An Emergency Response Plan shall be maintained containing details of the location, nature and quantity of chemicals, oils and fuels stored, any special hazards, a drawing showing location of drains and the emergency phone numbers of the Permit Holder and relevant authorities. It shall also include actions to be taken in the case of incidents which could affect the environment, such as fires and chemical/fuel spills. The emergency plan shall indicate that accidental releases of chemicals and fires caused by chemicals are to be managed as specified in the respective Safety Data Sheets.
- 2.6.2 In the case of an accident (including chemical spills, etc.), the Permit Holder shall follow the Emergency Response Plan referred to in Condition 2.6.2 and shall notify the Authority within 24 hours.
- 2.6.3 Small leaks or spills shall be cleared up immediately by the application of absorbent materials. All sand and other material shall be disposed of using the appropriate waste management procedures at facilities permitted for that type of waste.

## **2.7 Closure and Decommissioning**

- 2.7.1 The Permit Holder shall notify the Authority prior to ceasing operations permanently in part or full, whereby an application for cessation of operations shall be made to the Authority and shall include a decommissioning.
- 2.7.2 In the event of cessation of operations on the site, the Permit Holder shall remain responsible for all wastes and hazardous materials on site, which shall be removed from the site in accordance to good environmental practice and in such a manner that minimises environmental risk.

- 2.7.3 The Decommissioning Plan shall be implemented once approved by the Authority and within 12 months of final cessation or decommissioning of the Permitted activities or part thereof or according to a timeframe as may be agreed with the Authority in writing.
- 2.7.4 The obligations arising from this permit shall subsist until the Authority confirms in writing that the decommissioning plan has been implemented to its satisfaction.
- 2.7.5 When deemed necessary, the Authority may require the Permit Holder to take such additional measures as it considers necessary with respect to after care obligations in relation, but not limited to the remedial action, rehabilitation, and monitoring of the waste management or waste production site.

## **2.8 Technically Competent Person**

- 2.8.1 One member of the staff should be nominated as the Technically Competent Person (TCP) of the site, whereby this person is to physically represent the Permit Holder during the times when the Permit Holder will not be available.
- 2.8.2 The TCP is responsible for the implementation of all the obligations stipulated in this permit, must supervise the rest of the staff on site and is completely responsible to ascertain that all permit conditions are being adhered to and that unauthorised waste does not enter the site.
- 2.8.3 The TCP is to be present at all times on site and in her/his absence another member of staff is to substitute him/her temporarily. In the event that a TCP terminates her/his employment, another person shall be appointed as a TCP immediately and the Authority shall be informed of this change.
- 2.8.4 In the event of any short or long periods of sick leave or vacation leave taken by the TCP for a period exceeding 10 days, the Permit Holder is obliged to find a replacement for that member of staff without delay.
- 2.8.5 In the event where operations cease temporarily (2 weeks or more), the TCP or Permit Holder are obliged to notify the Authority within two (2) days and are also to inform the Authority with regards to when the works are intended to resume.
- 2.8.6 All the staff on site should be fully aware of the procedures to be taken to contain any environmental hazard which may arise related to the activities being carried out on site.

## **3 Records**

- 3.1 The Permit Holder shall endeavour to maintain an Environmental Management System (EMS) to facilitate compliance with permit conditions and to assist in formalising procedures required by this permit.
- 3.2 A weekly inventory of solvent usage and products cleaned and dried shall be maintained and kept on site for at least four years for inspection by the Competent Authority.
- 3.3 All the documentation necessary to verify the inventory, such as invoices, solvent usage logs, machine production logs and weight scales calibration logs shall be retained for a period of four years for inspection by the Competent Authority.
- 3.4 Any additional information necessary to verify emission calculations, such as Material Safety Data Sheets, waste disposal certificates and analysis results from an accredited laboratory (indicating the VOC content of the disposed waste), are also to be retained for a period of four years for inspection by the Competent Authority.

- 3.5 A testing and maintenance schedule is to be implemented by the Permit Holder and a log book kept at the permitted premises with details of all checks, maintenance, and repair work carried out on each dry cleaning machine and the scales used to weigh the loads.
- 3.6 The Permit Holder shall ensure that all records required to be made by this Permit and any other records made by it in relation to the operation of the Permitted Installation shall:
- a. be made available for inspection by the Authority upon request;
  - b. be supplied to the Authority on demand and without charge and in the format requested;
  - c. be legible;
  - d. indicate any amendments which have been made and shall include the original record wherever possible; and
  - e. be retained at the Permitted Installation, or other location agreed by the Authority in writing, for a minimum period of 4 years from the date when the records were made, unless otherwise agreed in writing.
- 3.7 Records shall be made in a legible manner and kept on site and be made available for inspection by the Authority at any reasonable time. The following information shall be recorded on a daily basis and retained for 5 years:
- a. Total amount of waste in kilos removed from site for disposal or further treatment;
  - b. Any incidents that took place on site such as mechanical faults in the machinery or equipment used on site, any spills, fires, etc and the remedial action taken; and
  - c. Any other incidents that the permit holder deems important to record in the site daily operations log;

Each record shall be compiled within 24 hours of the relevant event. The records kept in the daily operations log shall be available for inspection at any time when the Authority representatives request to inspect them.

## **4 Reporting**

- 4.1 The Permit Holder shall submit to the Authority an Annual Environmental Report (AER) of the previous calendar year by not later than end of March of each year, providing the information listed in Schedules 1 and 2 of this Permit and in the format specified therein.
- 4.2 The Permit Holder shall notify the Competent Authority immediately on becoming aware of any factor that has prevented or may prevent compliance with any of the conditions of this permit. Details of the factor and why compliance has been or may be prevented shall be provided.
- 4.3 The Solvent VOC Reporting Template shall include, as a minimum, the total solvent consumption, the reduction plan calculations, information on usage and emissions of designated risk VOCs, and details on any solvent disposed of as waste.
- 4.4 The Authority shall be informed within 24 hours in the event of an environmental hazard or major incidents

## **5 Notification**

- 5.1. The Permit Holder shall immediately notify the Authority upon:
- a. The detection of an emission of any substance which exceeds any limit or criterion in this Permit specified in relation to the substance;
  - b. The detection of any fugitive emission which has caused, is causing or may cause significant pollution;
  - c. The detection of any malfunction, breakdown or failure of plant or techniques which has caused, is causing or has the potential of causing significant pollution; and
  - d. Any accident which has caused, is causing or has the potential of causing significant pollution.
- 5.2. The Permit Holder shall submit written confirmation to the Authority of any notification under Condition 6.1, by sending:
- a. The information listed in Part A of Schedule 4 to this Permit within 24 hours of such notifications; and
  - b. The more detailed information listed in Part B of Schedule 4 as soon as practicable.

**Schedule 1**  
**Annual Environmental Report**

**Important note**

By this submission, you confirm that you give your explicit consent for the entire contents of this Annual Environment Report to be made available on the Authority's public website.

**S1.1 Introduction**

Environmental Permit Number	
Reporting Year (Calendar Year: 1 January to 31 December)	
Name and locality of Site	
Brief description of activities at the site	

**S1.2 Fuel Consumption Data**

Equipment <sup>1</sup>	Fuel type	Sulphur Content of Fuel <sup>2</sup>	Fuel Consumption	Units
Generator	Diesel			tonnes
Fire-pump	Diesel			tonnes
				tonnes

**S1.3 Off-site transfers (including exports) of hazardous waste**

Date of transfer	EWC Code <sup>3</sup>	Quantity of waste (in kg)	TFS/CP number	Ultimate destination

**S1.4 Transport of Waste**

Name(s) of registered waste carrier used during reporting year	Waste type(s) transported

<sup>1</sup> E.g. Boiler, generator, vehicles, etc.

<sup>2</sup> Specify units (e.g. as percentage, or mg/kg)

<sup>3</sup> European Waste Catalogue Code (Reference: Commission Decision 2000/532/EC: [http://eur-lex.europa.eu/smartapi/cgi/sga\\_doc?smartapi!celexplus!prod!CELEXnumdoc&numdoc=32000D0532&lg=en](http://eur-lex.europa.eu/smartapi/cgi/sga_doc?smartapi!celexplus!prod!CELEXnumdoc&numdoc=32000D0532&lg=en))



## S1.5 Monitoring Data

### S1.5.1 Solvent Emissions

Parameter	Emission point reference	Emission Limit Value (ELV) at a temperature of 273.15 K and a pressure of 101.3 kPa	Standard methodology used	Concentration (mgC/Nm <sup>3</sup> )	Flow rate (Nm <sup>3</sup> /h)	Total annual number of exceedances <sup>1</sup>		Total Annual Load (Mass flow of gas x operational hours) (Mass Flow = Concentration x Flow rate)	Unit
						Average of all the readings exceeding the ELV	Hourly average exceeding the ELV by a factor > 1.5		
Total VOC	PS1	100mgC/Nm <sup>3</sup>							kg
Total VOC	PS2	100mgC/Nm <sup>3</sup>							
Total VOC	PS4	100mgC/Nm <sup>3</sup>							
Total VOC	PS5	100mgC/Nm <sup>3</sup>							
Total VOC	PS7a	100mgC/Nm <sup>3</sup>							
Total VOC	PS7b	100mgC/Nm <sup>3</sup>							
Total VOC	PS7c	100mgC/Nm <sup>3</sup>							
Total VOC	PS7d	100mgC/Nm <sup>3</sup>							
Total VOC	PS7e	100mgC/Nm <sup>3</sup>							
Total VOC	PS8a	100mgC/Nm <sup>3</sup>							
Total VOC	PS8b	100mgC/Nm <sup>3</sup>							
Total VOC	PS8c	100mgC/Nm <sup>3</sup>							
Total VOC	PS8d	100mgC/Nm <sup>3</sup>							
Total VOC	PS12	100mgC/Nm <sup>3</sup>							
Total VOC	PS13	100mgC/Nm <sup>3</sup>							
Total VOC	PS19a	100mgC/Nm <sup>3</sup>							
Total VOC	PS19b	100mgC/Nm <sup>3</sup>							
Total VOC	PS19c	100mgC/Nm <sup>3</sup>							
Total VOC	PS19d	100mgC/Nm <sup>3</sup>							
MCP Monitoring	PS17	NO <sub>x</sub> 250mg/m <sup>3</sup>				N/A			
		CO							

<sup>1</sup> If the total number of exceedances exceeds 0, the value of each of these exceedances (for the reporting year) must be submitted in a separate report, together with action taken to regularise the situation.

**S1.6 Replacement of substances or preparations**

Plan for the replacement of substances and preparations	Replacement of substances and preparations. Kindly indicate for which substance or preparation (H340, H350, H350i, H360D or H360F) the plan has been drafted.

**N.B. Kindly attach any data or documentation required for the replacement of substances and/or preparations**

**Applicant's Declaration**

*I declare that, to the best of my knowledge, all the above information is correct and substantiated.*

\_\_\_\_\_  
**Name**  
*(in block letters)*

\_\_\_\_\_  
**ID Card Number**

\_\_\_\_\_  
**On behalf of / in my own name**  
*(in block letters)*

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

**Schedule 2**  
**Solvent VOC Reporting Template**

<b>Kindly fill in the questionnaire with the information requested below. This information is being requested for the reporting period detailed below, in accordance with the installation's Environmental permit.</b>	
<b>Permit Number</b>	<b>EP 0091/19</b>
<b>Installation</b>	<b>Crane Currency Malta Ltd.</b>
<b>Activity</b>	<b>Printing: Other Rotogravure, Rotary Screen and Varnishing</b>
<b>Reporting Period</b>	<b>01 January (Year) – 31 December (Year)</b>

1	<b>Solvent Input and Consumption calculations</b>			
<b>a</b>	New Solvent Input = The quantity of organic solvents or their quantity in mixtures purchased which are used as input into the process in the time frame over which the mass balance is being calculated	<b>I1</b>		<b>Kg VOC</b>
<b>b</b>	Quantity of organic solvents in Waste gases (annual load)  <i>Information / calculation to be submitted as part of AER – Section 1.8.1.</i>	<b>O1</b>		<b>Kg VOC</b>
<b>c</b>	Quantity of organic solvents and/or organic compounds lost due to chemical or physical reactions (including those that are destroyed by incineration or other waste gas or waste water treatments, or captured, as long as they are not counted under O6).	<b>O5</b>		<b>Kg VOC</b>
<b>d</b>	Quantity of organic solvents contained in disposed waste  <i>Only solvents in waste that was produced and disposed of during the reporting period should be included as O6.</i> <i>VOC content in waste needs to be verified by sampling and analysis in an accredited lab, and copy of test result to be submitted together with this report<sup>1</sup>.</i>	<b>O6</b>		<b>Kg VOC</b>
<b>e</b>	Sum of above Emissions (Total output of organic solvents)  <i>(cells 1b+1c+1d)</i>	<b>ΣO = O1+O5+O6</b>		<b>Kg VOC</b>
<b>f</b>	Fugitive Emissions = Input – (Total output of organic solvents) <i>(cells 1a – 1e)</i>	<b>F = I1 - ΣO</b>		<b>Kg VOC</b>
<b>g</b>	Quantity of waste containing solvents that was present on site at the end of the reporting period pending disposal	<b>/</b>		<b>Kg</b>
<b>2</b>	<b>Reduction Scheme Calculations</b>  (according to the scheme in Schedule V and the guidance in Schedule IV of the legislation)			
<b>a</b>	Total solids input to the installation  <i>(The total mass of solids in the quantity of coating and/or ink, varnish or adhesive consumed in a year is determined. Solids are all materials in coatings, inks, varnishes and adhesives that become solid once the water or the volatile organic compounds are evaporated)</i>	<b>S</b>		<b>Kg</b>

<sup>1</sup> In case waste load (and type) can be considered to be constant, a one-time sampling and analysis would be sufficient.

<b>b</b>	Annual reference emissions (cell 2a*4)	<b>R</b>		
<b>c</b>	Target emissions for the reporting period (cell 2b * 25%)	<b>T</b>		<b>Kg</b>
<b>d</b>	Total solvent input to the installation (cells 1a)	<b>I</b>		<b>Kg</b>
<b>e</b>	Total solvent emissions from the installation (cells 1f+1c)	<b>E = F +O1</b>		<b>Kg</b>
<b>3</b>	<p>If the Total Solvent Emissions exceeded the Target Emissions (<math>E &gt; T</math>), please provide further information on:</p> <ul style="list-style-type: none"> <li>▪ Timeframe during which the Emission Limit Value was exceeded</li> <li>▪ Reasons identified for non-compliance</li> <li>▪ Corrective actions taken</li> <li>▪ Emissions performance following the corrective actions</li> </ul> <p>This information is to be submitted as a signed and dated document together with this report. The document is to be referenced in the appropriate field on the right.</p>	<p><b>Attached Document</b></p> <p>_____</p> <p>(Name or Number reference)</p>		
<b>4</b>	<p>During the reporting period, did the installation make use of substances or preparations which, because of their content of VOCs classified as carcinogens, mutagens or toxic to reproduction, are assigned or need to carry the risk phrases R45, R46, R49, R60, and/or R61 (or the hazard statements H340, H350, H350i, H360D or H360F)?</p> <p><b>If YES, please submit the documentation required in accordance with permit condition 2.1.1.17 of EP0004/10.</b></p>	<b>Yes / No</b>		
<b>5</b>	<p>During the reporting period, did the installation make use of halogenated VOCs which are assigned or need to carry the risk phrases R40 or R68 (or the hazard statements H341 and H351)?</p> <p><b>If YES, please submit the documentation required in accordance with permit condition 2.1.1.18 of EP0004/10.</b></p>	<b>Yes / No</b>		
<b>6</b>	Other comments:			

**Applicant's Declaration**

*I declare that, to the best of my knowledge, all the above information is correct and substantiated.*

\_\_\_\_\_  
**Name**  
*(in block letters)*

\_\_\_\_\_  
**ID Card Number**

\_\_\_\_\_  
**On behalf of / in my own name**  
*(in block letters)*

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

**Schedule 3**

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**Submission of certifications and documentation**

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<b>Condition Number</b>	<b>Documentation</b>
2.1.6	Certification of good working order for the generators.
4.1	Submission of Annual Environmental Report

### Schedule 4

#### Notification of abnormal emissions

This page outlines the information that the Permit Holder must provide to satisfy Conditions 5.2 of this Permit.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by a request for commercial confidentiality.

#### Part A

Permit Number	
Name of Permit Holder	
Location of Installation	
Location of the emission	
Time and date of the emission	

Substance(s) emitted	Media <i>(e.g. air, groundwater)</i>	Best estimate of the quantity or the rate of emission <i>(include units)</i>	Time between which the emission took place

<p style="text-align: center;"><b>Measures taken, or intended to be taken, to stop the emission</b></p>	
---	--

**Part B**

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident.	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment or harm which has been or may be caused by the emission.	
The dates of any unauthorised emissions from the installation in the preceding 24 months.	

Name <sup>1</sup>	
I.D. Card No./Passport No.	
Designation	
Signature	
Date	

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<sup>1</sup> authorised to sign on behalf of Operator



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**Schedule 5**  
**Site Map**

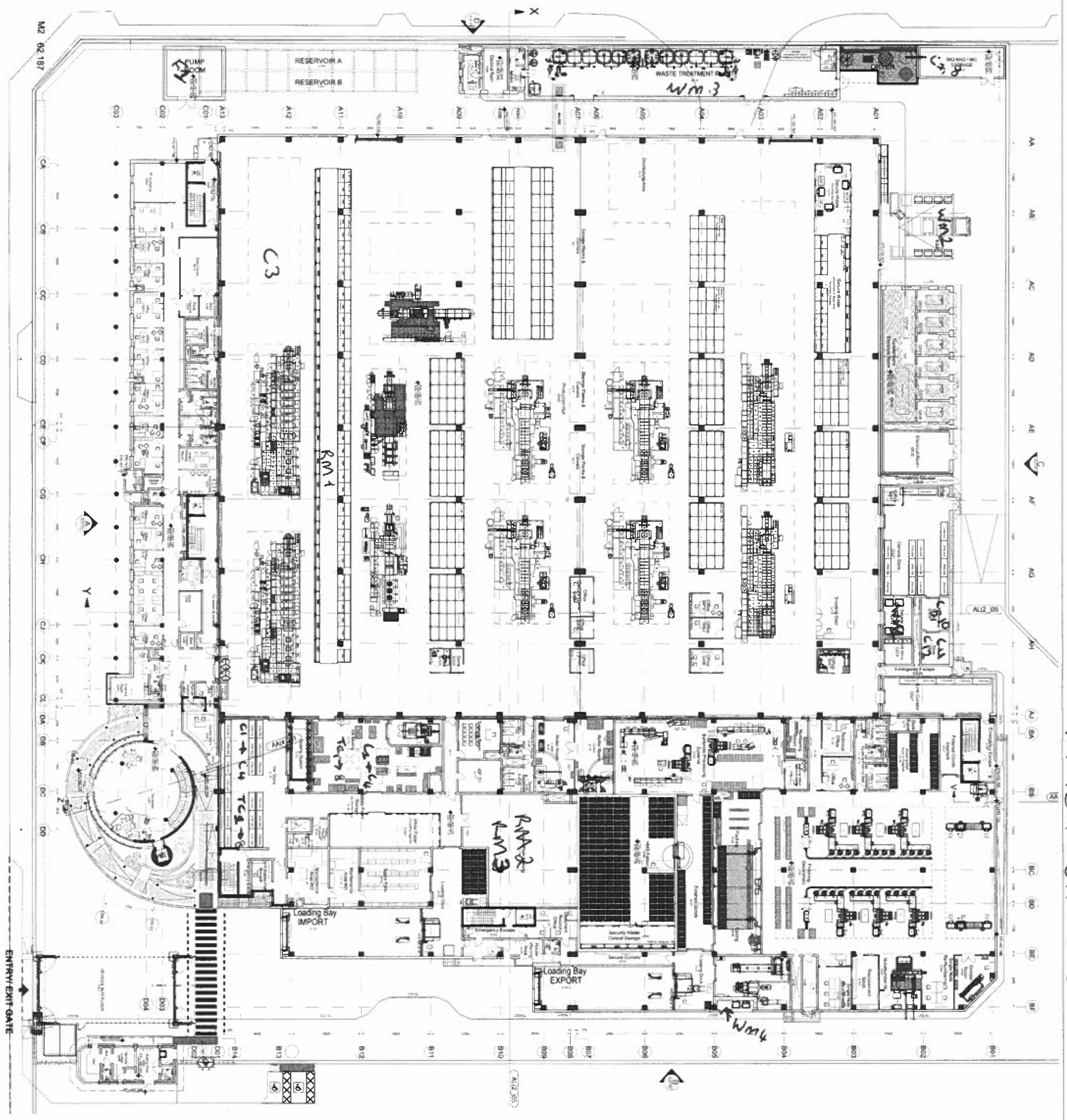
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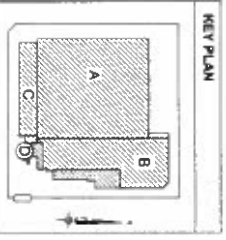
**Figure S6.1: Site of installation showing the extent of the area in red for the carrying out of the activities specified in condition 1.3.1. The extent of the site boundary is indicative and should not be used for interpretation purposes.**

**END OF PERMIT**

ATTACHMENT 2a



Approved Document  
EP 0091/19/DOC1



**NOTES**

1. The facility is to be used as follows:
2. All areas shown in this plan are to be used as shown.
3. All areas shown in this plan are to be used as shown.
4. All areas shown in this plan are to be used as shown.
5. All areas shown in this plan are to be used as shown.
6. All areas shown in this plan are to be used as shown.
7. All areas shown in this plan are to be used as shown.
8. All areas shown in this plan are to be used as shown.
9. All areas shown in this plan are to be used as shown.
10. All areas shown in this plan are to be used as shown.

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FOR INTERNAL USE ONLY

**REZZINA & COLE**  
ARCHITECTS & ENGINEERS  
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Project No: 0091/19/DOC1  
Drawing No: 0091/19/DOC1-01  
Date: 09/19/2019

Equipment Layout  
Ground Floor Level  
Facility for the VULFA

NO.	DATE	DESCRIPTION
1	09/19/2019	ISSUED FOR PERMIT
2	09/19/2019	ISSUED FOR PERMIT
3	09/19/2019	ISSUED FOR PERMIT
4	09/19/2019	ISSUED FOR PERMIT
5	09/19/2019	ISSUED FOR PERMIT
6	09/19/2019	ISSUED FOR PERMIT
7	09/19/2019	ISSUED FOR PERMIT
8	09/19/2019	ISSUED FOR PERMIT
9	09/19/2019	ISSUED FOR PERMIT
10	09/19/2019	ISSUED FOR PERMIT