

POLLUTION PREVENTION AND CONTROL ACT 1999 ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2016 as amended INDUSTRIAL EMISSIONS DIRECTIVE 2010/75/EU

Permit Number: 14/092300/LR2

Installation Address:
Swann-Morton Limited
Penn Works
Owlerton Green
Sheffield
S6 2BJ

In accordance with Regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 (as amended) Swann-Morton Limited is hereby permitted to operate a solvent emissions activity at the address detailed above, as described in Schedule 14 of the Regulations, and Chapter V and Annex VII of the Industrial Emissions Directive, and subject to the following permit conditions.

Signed Dated this day: 23.01.2025

Commercial Team Manager Authorised by Sheffield City Council to sign on their behalf. The Secretary of State's Process Guidance Note PG6/45(11) (revised June 2014) for Surface Cleaning has provided the framework for the conditions in this permit.

Name & Address of Operator:

Swann-Morton Limited Penn Works Owlerton Green Sheffield S6 2BJ

Site Contact: Darren Hall, Group Environmental Management Representative

Telephone: 0114 234 4231

Email address: darrenhall@swann-morton.com

Registered Office:

Swann-Morton Limited Penn Works Owlerton Green Sheffield S6 2BJ

Company registration number: 696744

Address of Permitted Installation:

Swann Morton Limited Penn Works Owlerton Green Sheffield S6 2BJ

Talking to Us

Any communication with Sheffield City Council should be made to the following address quoting the Permit number.

Environmental Protection Service

Sheffield City Council 4th Floor (South) Howden House 1 Union Street Sheffield S1 2SH

Telephone: (0114) 273 4651 Email:ippc@sheffield.gov.uk

Contents

Con	tents	3
Expl	lanatory Note	4
Defi	nitions	7
Des	cription of Activities	8
Con	ditions of Permit	10
1	Upgrading	10
2	Plant and Equipment	10
3	Emission Limits and Controls	10
4	Monitoring, Sampling and Measurement of Emissions	11
5	Solvent Management Plan	12
6	Materials Handling	12
7	General Conditions	13
Schedule 1 Installation Location and Boundary		16
Schedule 2 Installation Layout		17
Schedule 3 Process Flow Diagram		18
Schedule 4 – Solvent Management Plan		19
Sche	edule 5 – Degreasing Tanks	21

Explanatory Note to Pollution Prevention and Control Permit for Part B Installations

The following Permit is issued under Regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016, as amended (Statutory Instrument 1154), ("the EP Regulations") to operate an installation carrying out activities covered by the description in the Industrial Emissions Directive Annex VII, Parts 1 and 2, to the extent authorised by the Permit:

Annex VII, Part 1, 11 Surface Cleaning

Any activity except dry cleaning using organic solvents to remove contamination from the surface of material including degreasing using:

1 tonne or more of designated hazard statement VOC in any 12-month period

Or 2 tonnes or more of any other VOC in any 12-month period.

Process Changes

As part of your permit, you are required to notify the Council of any proposed change in operation at least 14 days before making the change. This must be in writing and must contain a full description of the proposed change in operation and the likely consequences. Failure to do so is an offence.

If you consider that a proposed change could result in the breach of the existing permit conditions or is likely to require the variation of permit conditions, then you may apply in writing under Regulation 20(1) of the EP Regulations. Additionally, if this involves a SUBSTANTIAL CHANGE to the installation you will be required to submit an application, pay the relevant fee and advertise the application accordingly. You may serve a Notice on the Council requesting that they determine whether any change that is proposed would constitute a substantial change before you proceed with application.

Variations to the Permit

The Permit may be varied in the future (by the Council serving a Variation Notice on the Operator). If the Operator itself wants any of the Conditions of the Permit to be changed, a formal Application must be submitted.

Surrender of the Permit

Where the operator of a Part B installation or mobile plant ceases or intends to cease the operation of the activity the operator may notify the regulator of the surrender of the whole permit, in any other case, notify the regulator of the surrender of the permit in so far as it authorises the operation of the installation or mobile plant which he/she has ceased or intends to cease operating. The notification shall contain information as described in Regulation 24 or 25 of the EP Regulations.

Transfer of the Permit or Part of the Permit

Before the Permit can be wholly or partially transferred to another person, a joint application to transfer the Permit has to be made by both the existing and proposed holders, in accordance with Regulation 21 of the EP Regulations. A transfer will be allowed unless Sheffield City Council considers that the proposed holder will not be the person who will have control over the operation of the installation or will not ensure compliance with the conditions of the transferred Permit.

Annual Subsistence Fee

In accordance with Regulation 66 of the EP Regulations, the holder of a permit is required to pay a fee for the subsistence of the Permit. This fee is payable annually on 1st April. You are advised that under the provisions of Regulation 66 (5) of the EP Regulations, if you fail to pay the fee due promptly, Sheffield City Council may revoke the Permit. You will be contacted separately each year in respect to this payment.

Public Register

The Council is required by Regulation 46 of the EP Regulations to maintain a Public Register containing information on all LAPPC installations and mobile plant. The register is available for inspection by the public free of charge during office hours (Monday to Friday 9.00 am to 5.00 pm) at the following address:

Environmental Protection Service

Sheffield City Council 4th Floor (South) Howden House 1 Union Street Sheffield S1 2SH

Telephone: (0114) 273 4651 Email: ippc@sheffield.gov.uk

Confidentiality

Sheffield City Council has a duty to consider the question of confidentiality of information supplied to it. If any information supplied is considered confidential, a statement of which information this applies to and the reasons why it is considered confidential should be specified. The Operator is reminded that he may apply to Sheffield City Council for the exclusion of information from the public register under the provisions of the Environmental Permitting (England and Wales) Regulations 2016, as amended.

Appeals

Under Regulation 31 of the EP Regulations operators have the right of appeal against the conditions attached to their permit. Schedule 6 of the EP Regulations sets out the detailed procedures.

Appeals against a Variation Notice do not have the effect of suspending the operation of the Notice. Appeals do not have the effect of suspending Permit conditions.

Notice of appeal against the conditions attached to the permit must be given within six months of the date of the Notice, which is the subject matter of the appeal.

How to Appeal

There are forms available to lodge an appeal here: https://www.gov.uk/government/publications/environmental-permit-appeal-form

There is no fee to appeal.

Where to Send Your Appeal Documents

Appeals should be addressed to:

The Planning Inspectorate Environment Appeals Team 3A Eagle Wing Temple Quay House 2 The Square Temple Quay Bristol BS1 6PN

Phone: 0303 444 5584

Email: etc@planninginspectorate.gov.uk

You must also send a copy of your appeal to the relevant regulator.

In the course of an Appeal process, the main parties will be informed of the procedural steps by the Planning Inspectorate.

To withdraw an Appeal the Appellant must notify the Planning Inspectorate, in writing, and copy the notification to the local authority.

Definitions

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

"Application" means the application for this Permit, together with any response to a notice served under Schedule 4 to the EPR Regulations and any operational change agreed under the conditions of this Permit.

"EPR Regulations" means the Environmental Permitting (England and Wales) Regulations S.I.2016 No. 1154 (As Amended) and words and expressions defined in the EPR Regulations shall have the same meanings when used in this Permit save to the extent they are explicitly defined in this Permit.

"Permitted Installation" means the activities and the limits to those activities described in this Permit.

"Monitoring" includes the taking and analysis of samples, instrumental measurements (periodic and continual), calibrations, examinations, tests and surveys.

"Regulator" means any officer of Sheffield City 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.

"BAT" 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 bases 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. For those purposes:

"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.

"best" means, in relation to techniques, the most effective in achieving a high general level of protection of the environment as a whole; "techniques" include 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.

"Fugitive Emission" means an emission to air from the permitted installation that is not controlled by an emission limit imposed by a condition of this Permit.

Description of Activities

Swann-Morton Ltd operate a production facility for various scalpels, blades and handles in Hillsborough in Sheffield at the location shown on the plan in Schedule 1 of this Permit. An aerial photograph of the site is shown below.



The permitted activity comprises the surface cleaning of products using vapour degreasing solvents.

The solvents are not designated hazard statement Volatile Organic Compounds (materials designated because of their VOC content hazard statement H340, H350, H350i, H360D or H360F. Or materials designated because of their halogenated VOC content hazard statements H341 or H351).

Surface cleaning or degreasing is carried out on the ground floor. A site layout plan is shown in Schedule 2. Raw materials (stainless and carbon steel strips) are blanked, heat treated, broken out and ground prior to an ultrasonic pre-clean in aqueous solution. The products are then solvent cleaned in one of four fully enclosed vapour degreasing tanks prior to packing and dispatch. The tanks are bespoke units manufactured by CC Hydrosonics Ltd. A fifth fully enclosed degreaser unit is used during breakdown or maintenance of one of the other units.

Delivery of solvents is in either 205-litre clip top drums, or Safetainers. Solvents are stored at areas as indicated on the plan in Schedule 2. Solvent in the degreaser tanks is replenished on an "as required" basis. The solvent storage tanks are transferred to the degreaser area. The degreaser machines are charged by pumping solvent from the solvent storage tanks via a closed pipe system.

The degreaser machines are switched on at the beginning of the day and run continuously until the close of business when they are switched off. The degreasers are fitted with solvent recovery systems and produce a small quantity of waste, which contains some solvent. The waste is collected in an IBC and stored bunded prior to removal from site by a registered carrier.

Hoppers containing clarifier waste (metal waste and filter paper) are stored over a bunded area which collects the liquid waste from these hoppers and pumps into a liquid waste holding tank. This tank has low level and high-level indicator alarms to warn of volume concerns and the tank is double bunded.

Particulate emissions from grinding operations are extracted to bag filters, which are vented through oil mist eliminators at the roof of the factory located as indicated on the plan in Schedule 2. The seven extraction units serve about twenty five grinder extraction points each through a total of thirty eight clarifiers which use re-circulating water as abatement. A quantity of sludge is formed which is removed from site by a registered carrier. Eight clarifiers are fitted with a magnet to separate out the metal waste, which drops into a collection bin to facilitate recycling.

A process flow diagram is presented in Schedule 3

Conditions of Permit

1 Upgrading

1.1 There are no upgrading conditions requirements.

2 Plant and Equipment

- 2.1 The activities at the installation shall be carried out within the installation boundary outlined in red as indicated on the Installation Location and Boundary plan shown in Schedule 1 of this Permit.
- 2.2 Permitted activities shall only be carried out using the plant and equipment as detailed in the Description of Activities and on the Installation Layout reproduced in Schedule 2 of this Permit.
- 2.3 Degreasing shall take place in fully enclosed tanks, the details of which are in Schedule 5 of this Permit.
- 2.4 The Operator shall notify Sheffield City Council's Environmental Protection Service, hereafter referred to as "the Regulator" of any proposed operational changes including any alterations to the process involving the provision of new plant or equipment which may affect emissions or have consequences for the environment. The information shall be submitted at least 14 days before the changes take place.
- 2.5 No plant or equipment used for any activity shall be operated with an extraction point to atmosphere unless specifically noted within this Permit or specifically agreed in writing with the Regulator.

3 Emission Limits and Controls

- 3.1 All emissions to air, other than steam or condensed water vapour shall be free from droplets and free from visible emissions.
- 3.2 There shall be no offensive odour detectable beyond the installation boundary, as perceived by the Regulator.
- 3.3 The use of odour masking agents is not permitted. Where offensive odour is detected at the installation boundary, counteractants may be used only by written agreement with the Regulator.
- 3.4 All surface cleaning activities shall take place inside hermetically sealed CC Hydrosonics machines, which shall be operated and maintained in accordance with manufacturer's instructions.
- 3.5 The CC Hydrosonics machines shall be sealed with sealing tape on all joints, taps and fixings.
- 3.6 A fugitive emission limit value from surface cleaning activities of 20% of the total solvent input shall apply.

4 Monitoring, Sampling and Measurement of Emissions

- 4.1 The Operator shall ensure that a detailed inventory of organic solvent usage is kept. The organic solvent inventory shall include the total mass of organic solvent inputs minus any solvents sent for reuse/recycling or recovery off site. The Operator shall consider the volatile organic compound content of any substances on work pieces when they arrive, together with the degreasing solvent usage in the vapour degreasing machines. The inventory shall also include all solvents removed from the site as waste and any quantities recovered for reuse. A twelvemonth summary of the inventory shall be forwarded in writing to the Regulator within one month of the closing date to which the summary inventory relates, namely January 31st each year.
- 4.2 In order to determine compliance or otherwise with the 20% of the total solvent input fugitive emission limit laid down in condition 3.6, fugitive emissions shall be calculated from the Solvent Management Plan and submitted as part of that Plan as required by condition 5.1. Details of the Solvent Management Plan calculation are available in Schedule 4.
- 4.3 In the case of abnormal emissions, the Operator shall:
 - Immediately investigate the cause and take corrective action;
 - Adjust the process or activity to minimise the emissions;
 - Promptly record the events and action taken.
- 4.4 The Operator shall inform the Regulator of any abnormal emissions within 1 week of the event unless there is an emission that is likely to have an effect on the local community, in which case the information shall be forwarded without delay and in any event no later than 10am the following working day.
- 4.5 In case of emissions of solvent that cause immediate danger to human health, the permitted process shall be suspended immediately.
- 4.6 The Operator shall keep records of any tests, inspections and abnormal emissions in accordance with condition 7.6 of this permit.
- 4.7 The Operator shall monitor the concentration of VOCs around the machines on a weekly basis and keep a record of the results.
- 4.8 The monitoring of the VOCs around the machines shall be undertaken using a calibrated suitable device.

5 Solvent Management Plan

- 5.1 The Operator shall calculate annual consumption of cleaning solvents and produce and submit a Solvent Management Plan to the Regulator on an annual basis by January 31st each year.
- 5.2 The Solvent Management Plan shall be reviewed at least annually. Review records and updates to the Solvent Management Plan shall be forwarded to the Regulator annually.
- 5.3 The Solvent Management Plan shall be written having regard to the method given in Process Guidance PG6/45 on Surface Cleaning, as reproduced in Schedule 4.
- 5.4 The Operator shall submit details for approval to the Regulator of any proposal in relation to any of the following activities:
 - Replacement of low or no VOC solvent degreasing systems with conventional high VOC content degreasing systems;
 - Introduction of conventional high VOC content degreasing systems into the process;
 - Introduction of conventional high VOC content degreasing systems onto products where it was not previously used;
 - Introduction of high solids formulations, which have no beneficial effect on the product but increase the solids used, except where a reduction in the overall VOC emissions can be demonstrated:
 - Introduction of designated hazard statement substances H340, H350, H350i, H360D, H360F, H341 or H351.

6 Materials Handling

- 6.1 All solvents shall be stored in Safetainers or sealed drums. Storage of solvents shall be in accordance with the advice in the relevant chemical data sheet.
- 6.2 The degreasing machines shall be totally enclosed at all times. The charging and emptying of the machines shall be from Safetainers or sealed drums by pump method and the system shall be a totally contained emission free transfer system.
- 6.3 The location of the solvent degreasing units shall, as far as reasonably practicable, be free from draughts to reduce losses through air turbulence. The area shall also be free from naked flames and hot surfaces.
- 6.4 Work-handling equipment for transporting the product shall be integral to the machine.
- 6.5 The baskets used for loading shall be designed to enhance the cleaning efficiency, whilst also minimising the retention of organic solvent and vapours with each load cleaned. The basket shall be loaded to its maximum capacity whilst ensuring that the orientation and packing of the components is optimised to reduce possible retention and drag of organic solvent.

- 6.6 The programming and loading of work into vapour degreasing machines shall be controlled, monitored and reviewed to ensure that the number of surface cleaning operations is minimised
- 6.7 In cases where a degreasing machine is expected to be unused for a period of 30 minutes or more, the unit shall be switched off.
- 6.8 Any stacking of the product prior to cleaning shall be done so as to reduce contamination of the work pieces.
- 6.9 Cleaning operations involving organic solvents shall be periodically reviewed, at least once every 2 years, to identify opportunities for reducing VOC emissions. The Operator shall provide the Regulator with a copy of this report.
- 6.10 All organic solvent contaminated materials, for example, rags or overalls impregnated with solvents, used spill kits, shall be stored in suitable containers prior to removal from site. The containers shall be metal and shall be fitted with self-closing lids.
- 6.11 All spillages of organic solvents shall be cleared immediately. Depending upon the size of the spill this may be by cloth or suction pump into a sealed container. Any VOC contaminated cloths shall be placed in a sealed container. Details of spillages including reasons, quantities, and remedial and preventative actions shall be recorded in accordance with condition 7.6 of this permit.
- 6.12 The waste solvent storage tank shall have low level and high-level alarms to control the volume of the tank. The tank shall be double bunded.
- 6.13 All bunding shall be impervious and resistant to the liquids in storage and be capable of holding 110% of the capacity of the largest storage container.
- 6.14 Empty drums or containers contaminated with organic solvent residues shall be closed or lidded to minimise emissions.
- 6.15 All reasonably practicable effort shall be made to minimise the amount of residual organic solvent bearing material left in drums or other containers after use

7 General Conditions

- 7.1 Effective preventative maintenance shall be employed on all plant and equipment concerned with the control of emissions to air. Essential spares and consumables shall be held on site or be available at short notice from suppliers, in order to rectify a breakdown rapidly.
- 7.2 The Operator shall keep a maintenance programme in relation to degreasers, extraction systems, storage areas and associated equipment. Records shall be kept of maintenance works carried out. The maintenance programme and maintenance records shall be made available for inspection by the Regulator upon request.
- 7.3 No solvents shall be used for cleaning other than in the permitted degreasing machines listed in this permit, unless agreed in writing by the Regulator.

- 7.4 Staff at all levels shall receive the necessary training in their duties relating to control of the process and emissions to air. The training shall include:
 - Awareness of responsibilities under this Permit with particular emphasis on conditions likely to give rise to VOC emissions (e.g. spillages);
 - Minimising emissions at start-up and shut-down;
 - Actions to minimise emissions during abnormal operating conditions.
- 7.5 The Operator shall keep and maintain a statement of training requirements for each operational post and keep a record of the training received by each employee whose actions may have an impact on emissions to atmosphere. These documents shall be made available to the Regulator upon request.
- 7.6 The Operator shall maintain records of any activities or incidents outlined in this Permit. Records up to and including the previous 2 years shall be kept on site. The records shall be made available to the Regulator upon request.
- 7.7 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.
- 7.8 The Operator shall notify the following to the Regulator, in writing, within 14 days of their occurrence: -
 - Any change in the trading name of Swann-Morton Ltd registered name or registered office address;
 - A change to any particulars of any ultimate holding company of Swann Morton Ltd (including details of an ultimate holding company where Swann Morton Ltd has become a subsidiary);
 - Any steps taken with a view to Swann Morton Ltd going into administration, entering into a company voluntary arrangement or being wound up.
- 7.9 The Operator shall notify the Regulator without delay of:
 - 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 that has caused, is causing or may cause significant pollution, unless the quantity emitted is so trivial that it would be incapable of causing significant pollution.
 - c) The detection of any malfunction, breakdown or failure of plant or techniques which has caused, is causing or has the potential to cause significant pollution.
 - d) Any accident, which has caused, is causing or has the potential to cause significant air pollution.

7.10 All reports and notifications required by this Permit, or under any Article under the Industrial Emissions Directive, shall be sent to the Regulator. Unless notified in writing, all reports, notifications and communications in respect of this Permit shall be sent to:

epsadmin@sheffield.gov.uk or ippc@sheffield.gov.uk

or

Sheffield City Council, Environmental Protection Service, Howden House 1 Union Street Sheffield S1 2SH

END OF CONDITIONS

Please Note

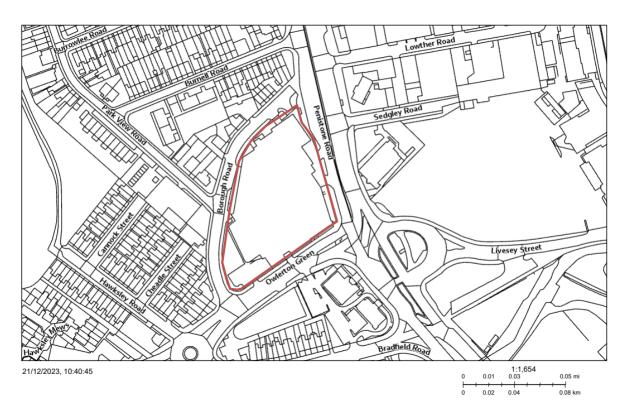
Where complaint is attributable to the operation of the installation and is, in the opinion of the Local Authority, justified, or if new knowledge develops on the potential for harmful effects from emissions, an immediate review of the Permit shall be undertaken. The Local Authority shall subsequently specify any new requirements and compliance time scales.

An annual subsistence fee as prescribed by the Secretary of State for the Environment shall be payable, for this Permit, by the process Operator, to this Authority within 2 weeks of the 1^{st of} April of each year.

In the event that the Permit has been issued after the 1^{st of} April in the initial year then the subsistence fee shall be pro rata for the complete months remaining and shall be due within 2 weeks of the Permit issue date.

If the relevant payment is not received by the Regulator, Sheffield City Council's Environmental Protection Service, then Permit revocation procedures may be initiated.

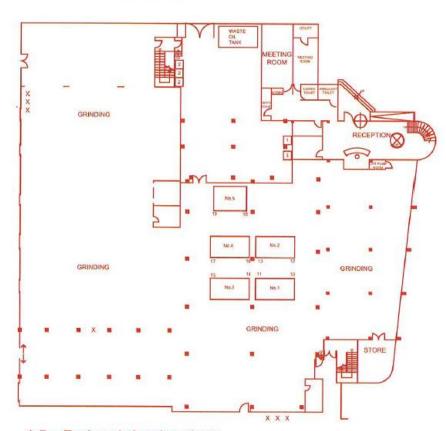
Schedule 1 Installation Location and Boundary



Schedule 2 Installation Layout



OWLERTON GREEN

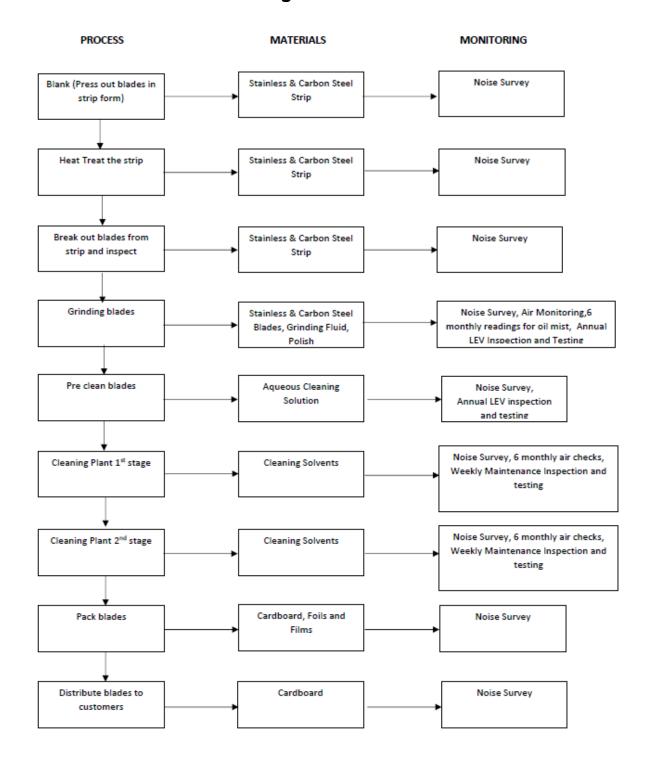


- 1-5 = Enclosed cleaning plants
- 1 = Waste solvent IBC storage tank 2 = Solvent storage tanks (Safetainer System) 3 = Solvent storage tanks
- 10-19 sample points for Mass emission Degreaser Tank Serial Numbers:
- No.1: 3 stage vapour degreaser
- No.2: 3 stage vapour degreaser
- No.3: 2 stage vapour degreaser
- No.4: 3 stage vapour degreaser
- No.5: 3 stage vapour degreaser

Oil mist eliminator extraction terminations

Manufacturer CC Hydrosonics

Schedule 3 Process Flow Diagram



Schedule 4 Solvent Management Plan

Inputs:

How much solvent is:

- bought, whether in pure form or contained in products
- recycled back into the process

Outputs:

How much solvent is:

- emitted to air, whether directly or via abatement equipment;
- discharged to water, whether directly or via water treatment;
- sent away in waste;
- lost by spills, leaks etc;
- leaving the installation in the product.

Inputs of Organic Solvent in the time frame over which the mass balance is being calculated (I)

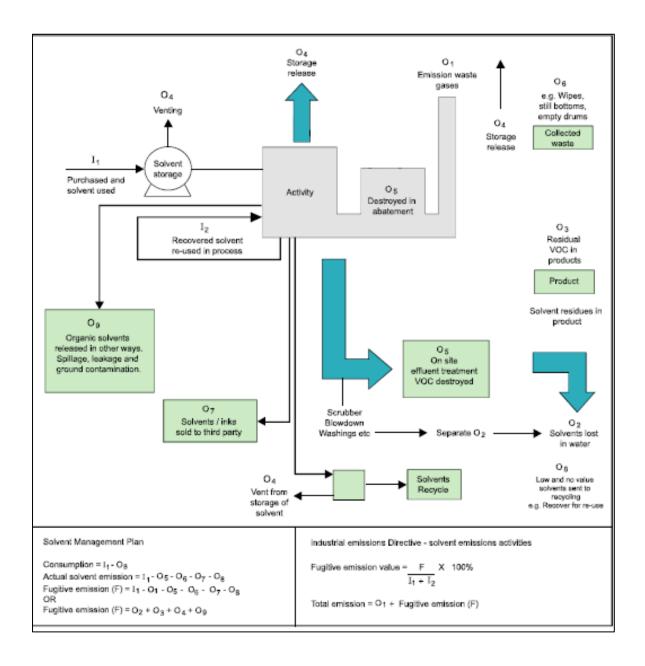
I1 The quantity of organic solvents or their quantity in mixtures purchased which are used as input into the process/activity

12 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 wastewater 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 wastewater 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.



Schedule 5 Degreasing Tanks

Equipment	Manufacturer	Serial Number
Tank 1 (3 stage vapour degreaser)	CC Hydrosonics Limited	687052011
Tank 2 (3 stage vapour degreaser)	CC Hydrosonics Limited	884042014
Tank 3 (2 stage vapour degreaser)	CC Hydrosonics Limited	1589092024
Tank 4 (3 stage vapour degreaser)	CC Hydrosonics Limited	977102015
Tank 5 (3 stage vapour degreaser)	CC Hydrosonics Limited	384052005