



**POLLUTION PREVENTION AND CONTROL ACT 1999
ENVIRONMENTAL PERMITTING (ENGLAND & WALES) REGULATIONS 2010,
as amended**

Permit Number: 2.1/069639/JT

**Installation Address: ELG Utica Alloys Ltd
1 Hawke Street
Sheffield
S9 2SU**

In accordance with Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010 as amended, ELG Utica Alloys Ltd is hereby permitted to operate a scheduled activity at the address detailed above, namely metal decontamination as described in Schedule 1, Part 2, Chapter 2, Section 2.2, Part B, subsection (b) and subject to the following conditions of this Permit.

Signed: _____ Dated this day: ~~10th February 2013~~

**Assistant Manager
Authorised by Sheffield City Council to sign on their behalf**

The Secretary of States Process Guidance Note 2/9 (04) "Guidance for Metal Decontamination Processes" has provided the framework for the conditions in this permit.

Name & Address of Operator:

ELG Utica Alloys Limited
Templeborough Works
Sheffield Road
S9 1RT

Registered Office:

ELG Utica Alloys Limited
Templeborough Works
Sheffield Road
S9 1RT

Address of Permitted Installation:

ELG Utica Alloys Limited
1 Hawke Street
Sheffield
S9 2SU

Company Registration: 07793480

Holding Company:

ELG Haniel GmbH
3093 Hafenummer
Kremerskamp 16
47138 Duisburg
Germany

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
2-10 Carbrook Hall Road
Carbrook
Sheffield
S9 2DB**

Email: epsadmin@sheffield.gov.uk or jppc@sheffield.gov.uk

Telephone (0114) 273 4651
Fax: (0114) 273 6464

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

(This note does not form a part of the Permit)

The following Permit is issued under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010 (S.I. No.675), as amended, (“the EP Regulations”) to operate an installation carrying out activities covered by the description in section 2.2, Chapter 2 of Schedule 1 of those Regulations, to the extent authorised by the Permit:

Process Changes

Under the provisions of Regulation 69 of the EP Regulations, 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 65 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 65 (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
2-10 Carbrook Hall Road
Carbrook
Sheffield
S9 2DB

Tel: 0114 273 4651

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 2007 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 no forms or charges for appealing. However, for an appeal to be valid, appellants (the person/operator making the appeal) are legally required to provide:

- Written notice of the appeal;
- A statement of the grounds of appeal;
- A statement indicating whether the appellant wishes the appeal to be dealt with by written representations procedure or a hearing - a hearing must be held if either the appellant or enforcing authority requests this, or if the Planning Inspector or the Secretary of State decides to hold one.
- (Appellants must copy the above three items to the local authority when the appeal is made)
- A copy of any relevant application;
- A copy of any relevant permit;
- A copy of any relevant correspondence between the appellant and the regulator; and
- A copy of any decision or notice, which is the subject matter of the appeal.

Where to Send Your Appeal Documents

Appeals should be addressed to:

**The Planning Inspectorate
Environmental Appeals Administration
Room 4/19 - Eagle Wing
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN**

In the course of an Appeal process the main parties will be informed of 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.

Description of Activities

ELG Utica Limited operates a metal swarf washing and drying process at Hawke Street in Sheffield, located as indicated by the plan in Schedule 1 of this Permit.

Metal swarf is received on site in a machined condition, unloaded, weighed and sorted before being sent through a rotary drum washer. Hot water and detergent is used to remove cutting fluid residues.

After washing, the swarf is transferred to a double skinned rotary kiln dryer. In the dryer, heat is indirectly applied to the swarf via the cavity between the skins, to remove the remaining residues. The rotary dryer has a net rated thermal input in excess of 0.2MW. Products of gas combustion (NO_x, CO) from the process of indirect heating of the rotary dryer are released via a 12 metre stack labelled at A2 in Schedule 3 of this permit.

The rotary furnace is fitted with an afterburner (direct fired thermal oxidiser) with a net rated thermal input in excess of 0.2MW designed with adequate temperature and retention times in order to destroy pollutants in accordance with the secretary of state's guidance. The temperature of the thermal oxidiser is continually monitored and set to alarm if the temperature drops to below a predetermined set point.

Emissions from the swarf drying process are extracted via ducting to a cyclone to drop out a majority of the particulates. Gases are then heated in the afterburner to remove the volatile organic compounds (VOC's). Gases are then cooled via a heat exchanger and passed through a cartridge filter to remove finer particulates. Emissions of CO, NO_x, particulates and VOC's are then exhausted to the external air via the 12m stack marked as stack A1 on Schedule 2 of this permit.

Continuous monitoring equipment of the after burner temperature is installed. If this temperature drops below a predetermined set point an alarm is triggered and the feed conveyor to the kiln is stopped.

Volume airflow is predicted to be in excess of 150m³/min.

The stack A1 serving the extraction system will be fitted with a Continuous Emissions Monitor (CEM) in the stack to monitor particulate emissions, if the stack testing demonstrates emissions of particulates exceed 5mg/m³ on commissioning. Where a (CEM) is required, it will be fitted with an alarm set to trigger when the emissions reach a reference level which equates to 15mg/m³.

A pressure drop indicator will be fitted to the cartridge filter to measure the pressure differential across the filter and connected to an alarm.

Initial extractive emissions monitoring shall be undertaken to determine whether continuous particulate and other pollutant monitoring is required.

The clean swarf final product is discharged from the rotary kiln for loading into bags or placed in containers, and into storage or onto vehicles for dispatch to customers for use in the aerospace industry.

The permit covers the receipt, handling and storage of raw materials and the storage, handling and despatch of wastes within the installation boundary.

CONDITIONS OF PERMIT.

Section 1 - Upgrading

- 1.1 By 31st May 2013, a continuous emissions monitor and datalogger shall be fitted to monitor the emissions of total particulate matter from the thermal oxidiser stack, if emissions testing demonstrates concentrations in excess of 5mg/m³ are being released.

Section 2 - Plant and Equipment

- 2.1 Permitted activities shall only be carried on within the installation boundary as indicated by red shading on the plan in Schedule 1 of this Permit.
- 2.2 The operator or permit holder shall ensure that only the plant and equipment as detailed in the Description of Activities in this permit, and illustrated in Schedule 2, are used at the installation.
- 2.3 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.
- 2.4 The operator or permit holder shall inform Sheffield City Council's Environmental Protection Service of any proposed changes to the installation which may have an impact on the emissions to atmosphere. This includes, but is not restricted to, changes to plant or equipment or changes to substances used. The information shall be submitted in writing 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 Sheffield City Council's Environmental Protection Service.

Section 3 - Emission Limits and Controls

- 3.1 All emissions to air, other than steam or condensed water vapour shall be free from droplets and from persistent mist and persistent fume.
- 3.2 Emissions from combustion processes shall not exceed the equivalent of Ringelmann Shade 1 as described in British Standard BS2742:2009. Emissions shall be free from smoke during normal operation.
- 3.3 There shall be no offensive odour detectable beyond the site boundary, as perceived by authorised officers of Sheffield City Council's Environmental Protection Service.

- 3.4 In the keeping of records, all pollutant concentrations shall be expressed at reference conditions 273K, 101.3Kpa, oxygen and water references shall be that which corresponds to the normal operating conditions in the process concerned.
- 3.5 There shall be no burning in the open air within the installation boundary.
- 3.6 Emissions from the stack serving the cartridge filter extraction system shall not exceed the limits for the pollutants as set out in the Table below:

Pollutant	Concentration
Total particulate matter	20mg/m ³
Organic compounds excluding particulate matter	20mg/m ³
Chloride emissions excluding particulate matter	10mg/m ³

- 3.7 By 1st April 2013, and annually thereafter, emissions to air shall be monitored to demonstrate compliance with concentration limits in condition 3.6.
- 3.8 Monitoring of emissions shall be carried out in accordance with methods described in M1¹ and M2², or by another method agreed in writing by Sheffield City Council's Environmental Protection Service.
- 3.9 Non-continuous emissions monitoring of particulate matter shall be carried out in accordance with the main procedural requirements of BS ISO12141:2002 or BS EN 13284:Part 1 with averages taken over operating periods excluding start up and shut down. Sampling equipment shall be capable of collecting at least 75% of particulate matter of 0.1 microns diameter or less.
- 3.10 Where the results of any non-continuous monitoring demonstrate a breach of the emission concentration limit, the permit holder or operator shall investigate the matter as soon as possible. The investigation shall include the following steps:
- Close down the process or plant responsible for the breach;
 - Identify the cause of the breach;
 - Carry out any necessary works or repairs to ensure compliance with the emission concentration limit;
 - Re-test the plant to demonstrate compliance with the emission concentration limit specified;
 - Submit the emissions monitoring report to Sheffield City Council's Environmental Protection Service within 7 days of receipt of the results;
 - Record details of investigation and outcomes in the log book.

¹ "Sampling requirements for monitoring stack emissions to air from industrial installations", Environment Agency,

² "Monitoring of stack emissions to air", Environment Agency, <http://www.mcerts.net>

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- 3.11 Where the results of any non-continuous monitoring exceed the emission concentration limit, the operator or permit holder shall inform Sheffield City Council's Environmental Protection Service no later than 10.00 hours the following working day after receipt of the results of the emissions testing.
- 3.12 Prior to any non-continuous monitoring being carried out, the operator or permit holder shall ensure that monitoring protocols are submitted to the Environmental Protection Service for approval. The monitoring protocols shall include the proposed date and time of the testing, the method to be used and the pollutants to be monitored. The Environmental Protection Service at Sheffield City Council shall be informed at least 7 days prior to the intention to carry out periodic monitoring.
- 3.13 The results of annual non-continuous monitoring tests shall be forwarded to Sheffield City Council's Environmental Protection Service, within 8 weeks of completion of the testing.
- 3.14 The introduction of dilution air into duct systems in order to comply with emission limits is not permitted.

Section 4 - Monitoring, Sampling and Measurement of Emissions

- 4.1 A visual and olfactory assessment of fugitive fume and dust emissions from the rotary drier shall be carried out at least once a day during operation. The duration of the assessment shall be for a minimum of one minute. All results of observations shall be recorded in accordance with condition 4.3.
- 4.2 The operator or permit holder shall ensure that adverse results from the assessments carried out in accordance with permit conditions are investigated immediately to identify the cause of the emission and allow the appropriate corrective action to be taken. The corrective action taken shall be recorded in the log book kept in accordance with condition 4.3.
- 4.3 The operator or permit holder shall ensure that records of details and results of all actions made in accordance with conditions 4.1, 4.2, 4.4, 5.3, 5.5, 9.3 and 10.1 is kept. These records shall include the time and date of inspection, the nature, colour, persistency and intensity of any emission and the name of the person carrying out the assessment. The records shall be kept on the premises and made available for inspection by authorised officers of Sheffield City Council's Environmental Protection Service. Such records shall be kept for a minimum of two years and shall be furnished in writing to Sheffield City Council on demand.
- 4.4 In any case of abnormal emissions, or alarm event, the operator or permit holder shall:
- Identify the cause of the emissions and take corrective action immediately;
 - Adjust or cease the process or activity to minimise the emissions;
 - Record details of the incident describing the nature and extent of the problems and the remedial actions taken, in accordance with condition 4.3.

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- 4.5 The permit holder or operator shall inform Sheffield City Council's Environmental Protection Service within one day in cases where:
- An emission is likely to have an effect on neighbouring premises; or
 - There is a failure of any arrestment plant.
- The report to Sheffield City Council's Environmental Protection Service shall include:
- The date and time of the incident;
 - The cause and nature of the incident;
 - Details of any abnormal emissions;
 - Remedial action taken.

Section 5 - Continuous Indicative Monitors

- 5.1 Where the concentration of total particulate matter laid down in condition 1.1 is met, the stack serving the cartridge filter shall be fitted with a continuous indicative monitor and datalogger for particulate matter by 31st May 2013. The monitor shall operate whenever the rotary drier is operating.
- 5.2 The continuous emissions monitor, where installed, shall be fitted with an alarm which is set to trigger at a reference level which equates to a concentration of 15 mg/m³. The activation of alarm events shall be automatically recorded.
- 5.3 The continuous indicative monitor, alarm and datalogger, where fitted, shall be checked at least once a week to ensure sound operation. Details of these checks shall be recorded in accordance with condition 4.3.
- 5.4 Where fitted, a six monthly summary of automatically recorded alarm events from the continuous indicative monitor and datalogger shall be forwarded to Sheffield City Council's Environmental Protection Service, within 2 weeks of the end of the period. The first summary is required by 14th December 2013.
- 5.5 Where fitted, the continuous indicative monitor and data logger shall be calibrated annually and maintained in accordance with the manufacturer's recommendations. Details of all maintenance and calibration shall be recorded in accordance with condition 4.3 of this permit.
- 5.6 The cartridge filter shall be fitted with a pressure drop indicator set to alarm in case of filter failure. The alarms shall be audible and visual and on display to operators.
- 5.7 An alarm event procedure shall be written and in place detailing what steps shall be taken in the event of an alarm to the cartridge filter and, where fitted, to the thermal oxidiser particulate continuous emissions monitor.

Section 6 - Metal Decontamination Control Techniques

- 6.1 Emissions of particulate matter from the rotary drier shall be contained, extracted and abated to meet the emission limits specified in condition 3.6 of this permit.

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- 6.2 The rotary drier plant shall not be overloaded, in order to ensure that maximum efficiency is achieved and to minimise the production of smoke and other products of incomplete combustion.
 - 6.3 Loading of the main chamber shall not occur until the secondary burner chamber has reached a temperature of 850 °C.
 - 6.4 The secondary combustion chamber shall be maintained at a temperature of at least 850 °C and the residence time of gases in that chamber shall be at least 0.6 seconds.
 - 6.5 The temperature of the thermal oxidiser shall be continuously monitored and set to alarm if the temperature falls below 760 °C.
 - 6.6 The kiln feed conveyor shall be interlocked such that when the temperature of the thermal oxidiser falls below 760 °C the feed conveyor is stopped automatically.

Section 7 - Maintenance of Abatement Plant

- 7.1 Effective, preventative maintenance shall be employed on all plant and equipment concerned with the control of emissions to air.
- 7.2 Plant and equipment shall be operated and maintained in accordance with the manufacturer's recommendations.
- 7.3 An audit of items of pollution abatement plant and equipment shall be undertaken. The audit shall identify all plant and equipment that is critical to prevent, reduce or control emissions from the installation, including but not limited to filters, alarms, monitoring and detection systems, thermal oxidiser, bunds and Spill Kits. A copy of the audit shall be submitted to Sheffield City Council's Environmental Protection Service for written approval within 8 weeks of the date of this Permit.
- 7.4 A preventative maintenance schedule shall be produced for all plant and equipment identified from the audit required by condition 7.3. A copy of the maintenance schedule shall be submitted to Sheffield City Council's Environmental Protection Service for written approval within 8 weeks of the date of this Permit.
- 7.5 The preventative maintenance schedule required by condition 7.4 shall be available on site for inspection by authorised officers of Sheffield City Council's Environmental Protection Service.
- 7.6 Records of breakdowns and plant failure shall be kept and analysed in order to eliminate common failures. The records shall be made available for inspection by officers of Sheffield City Council's Environmental Protection Service on demand.

Section 8 - Materials Handling

- 8.1 Materials likely to generate particulate matter shall be unloaded, weighed, transported and stored in such a manner that the emission of particulate matter to the air is prevented or, where not practicable, minimised and rendered harmless.
- 8.2 The permit holder or operator shall ensure that any spillage of particulate materials is cleaned up immediately by a wet method or vacuum cleaning in order to minimise particulate matter emissions to air. Dry sweeping is not permitted where it may result in the generation of airborne particulate matter to air outside any building.
- 8.3 Arrested particulate matter from the cartridge filters shall be collected directly into heavy duty bags or collection receptacles under the arrestment plant. The bags or receptacles shall be sealed before being deposited in the waste skip, in order to minimise emissions of particulate matter and prevent the double handling of fines.
- 8.4 Spares and consumables subject to continual wear such as cartridge filters shall be held on site or shall be available within 24 hours from guaranteed suppliers.
- 8.5 All potentially dusty materials shall be stored in covered containers or under cover.

Section 9 - Stacks, Vents and Exhausts

- 9.1 Chimneys or process vents shall not be fitted with any restriction at the final opening, for example, a plate, cap or cowl. A cone fitted at the chimney exit to increase efflux velocity shall be permitted. The discharge shall be vertically upwards.
- 9.2 Stacks serving the degreasing rotary drier plant shall be adequately insulated to minimise cooling of waste gases and steam to prevent liquid condensation. Stacks and ductwork shall be leak proof.
- 9.3 Chimney flues and ductwork shall be inspected at least once every 6 months and cleaned as necessary in order to prevent accumulation of material both on the internal ducting and on external ledges. Details of the inspection and any cleaning necessary as a result of the inspection shall be recorded in the log book kept in accordance with Condition 4.3 of this Permit.

Section 10 - General Conditions

- 10.1 External surfaces of the process buildings, ancillary plant and open yards and storage areas shall be inspected annually and cleaned if necessary to prevent the accumulation of dusty material where dust may become wind entrained. Particular attention shall be paid to roofs, guttering, roadways, external storage areas and yards. Cleaning operations shall be carried out by wet sweeping methods or vacuuming in order to minimise emissions of particulate matter to air. A record of the inspection and cleaning shall be recorded in the log book kept in accordance with condition 4.3 of this permit.
- 10.2 The operator or permit holder shall inform Sheffield City Council's Environmental Protection Service at least 14 days in advance of any proposed changes to the permitted activities.
- 10.3 Staff at all levels shall receive training and instructions necessary for their duties and shall include the following:
- Responsibilities under the permit;
 - Minimisation of emissions at start up and shut down;
 - Actions during abnormal emissions including minimisation of emissions.
- 10.4 The operator or permit holder 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 Sheffield City Council's Environmental Protection Service upon request.
- 10.5 A record shall be made at the permitted installation of any complaints concerning the installation's effect or alleged effect on the environment. The record shall give the date of complaint, time of complaint, a summary of any investigation and the results of such investigation. Such records shall be made in a log kept for this purpose.
- 10.6 Records kept in accordance with this Permit shall be legible, be made as soon as reasonably practicable and indicate any amendments which have been made and shall include the original record wherever possible.
- 10.7 All reports and notifications required by this Permit, or under any Regulation under the Environmental Permitting Regulations 2010, as amended, shall be sent to Sheffield City Council's Environmental Protection Service. Unless notified in writing, all reports, notifications and communications in respect of this Permit shall be sent to:

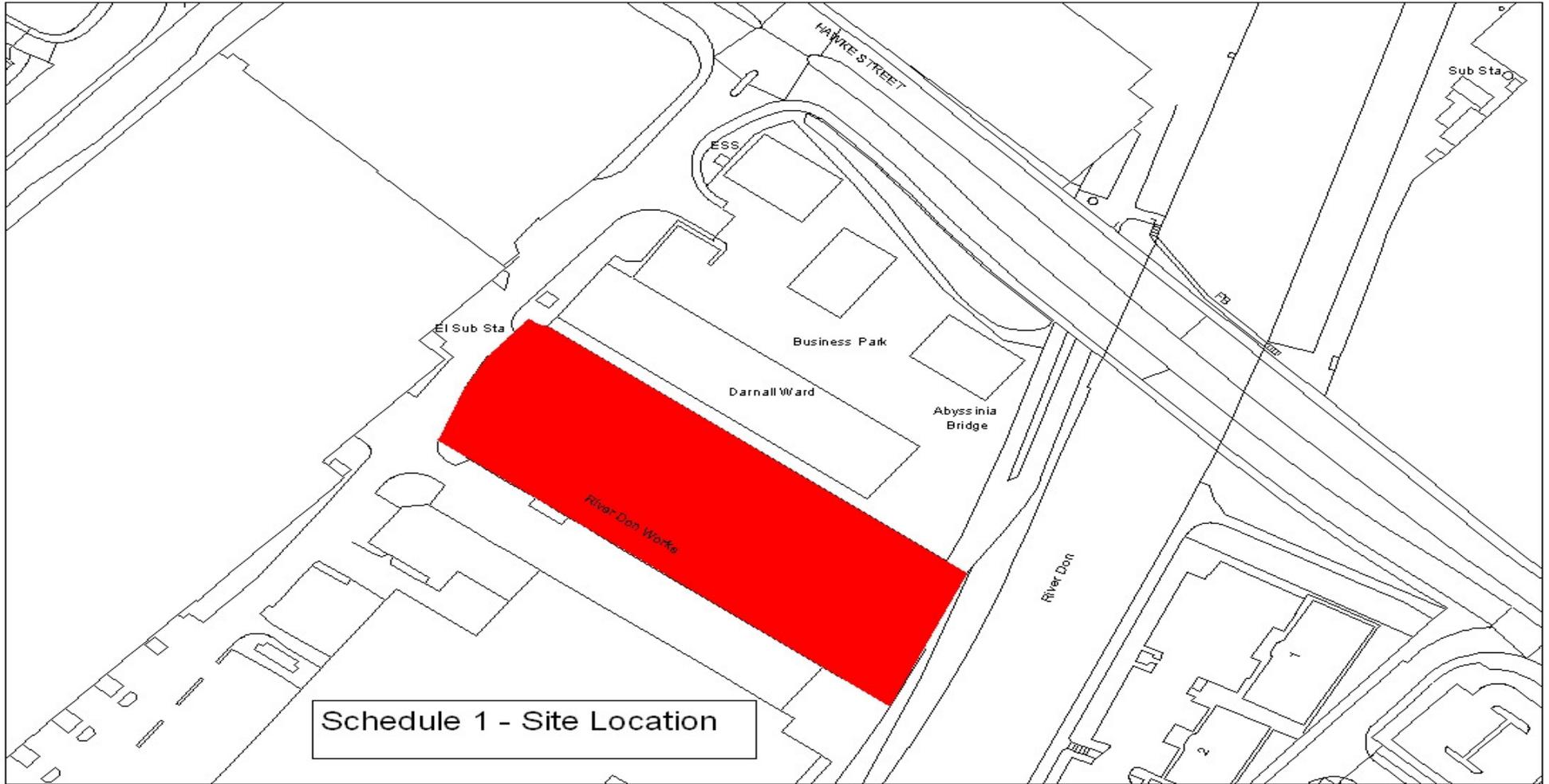
**Sheffield City Council,
Environmental Protection Service,
2-10 Carbrook Hall Road,
Sheffield
S9 2DB.**

10.8 The permit holder or operator shall notify the following to Sheffield City Council's Environmental Protection Service, in writing, within 14 days of their occurrence:-

- Any change in the trading name of ELG Utica Alloys Limited registered name or registered office address;
- A change to any particulars of any ultimate holding company of ELG Utica Alloys Limited (including details of an ultimate holding company where ELG Utica Alloys Limited has become a subsidiary);
- Any steps taken with a view to ELG Utica Alloys Limited going into administration, entering into a company voluntary arrangement or being wound up.

10.9 The permit holder or operator shall give written notification to Sheffield City Council's Environmental Protection Service in the following instances;

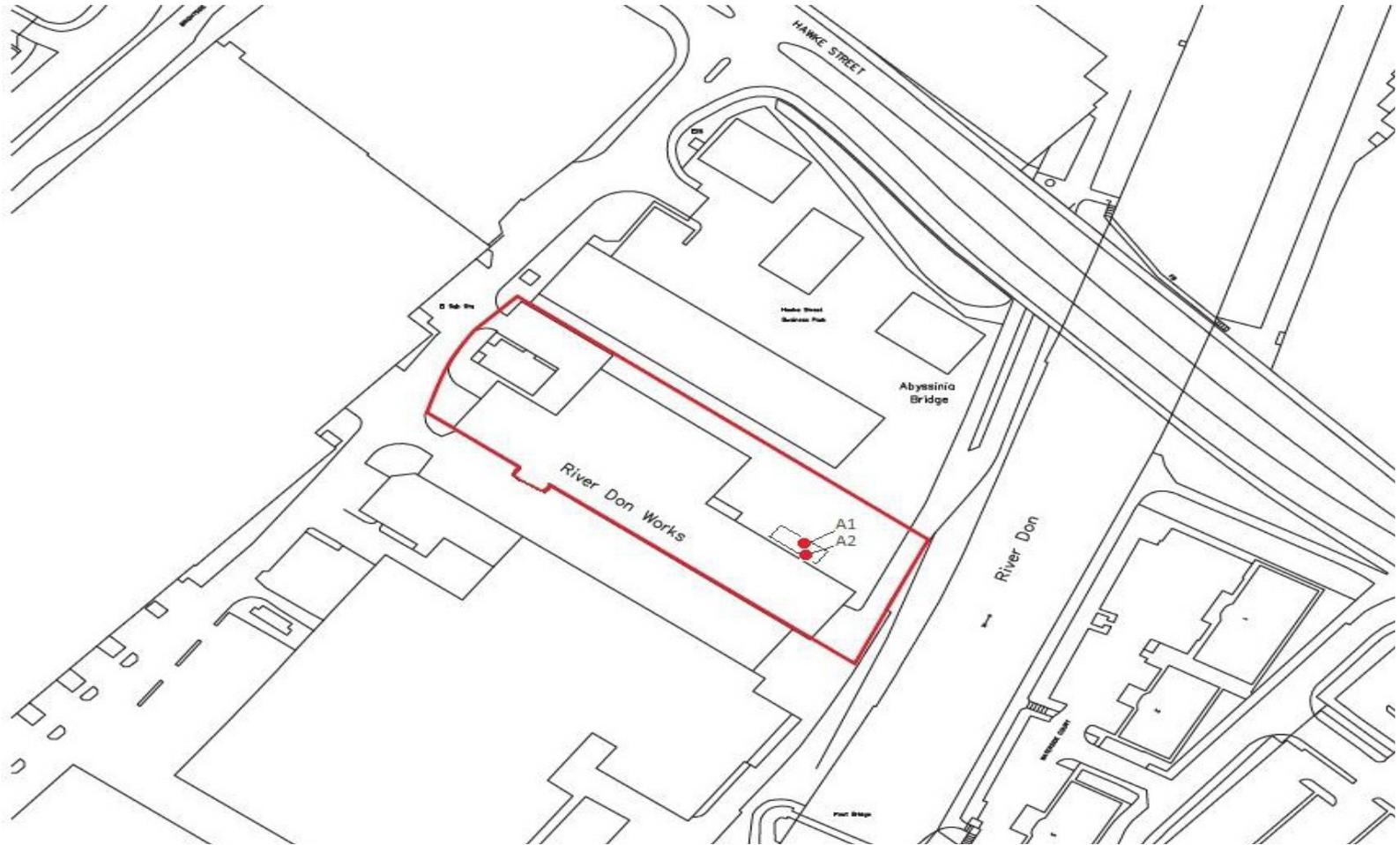
- a) Permanent cessation of the operation of any part of, or all of the Permitted Installation;
- b) Cessation of the operation of any part of, or all of the Permitted Installation for a period, likely to exceed 1 year;
- c) Resumption of the operation of any part of, or all of the Permitted installation after a cessation notified under (b) above.



Schedule 1 - Site Location

Schedule 1 – Installation Location

Schedule 2 – Installation Boundary



Schedule 3 – Installation Plant and Emission Points

