

Surrender notice with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Glaxo Operations UK Limited

Ulverston Pharmaceuticals North Lonsdale Road Ulverston Cumbria LA12 9DR

Surrender application number

EPR/BM4350ID/S006

Permit number

EPR/BM4350ID

Ulverston Pharmaceuticals Permit number EPR/BM4350ID

Introductory note

This introductory note does not form a part of the notice.

The following notice gives notice of the surrender in part and variation of an environmental permit.

Partial surrender to remove approximately 8.0ha of land from the Installation boundary, for the following areas of land:

- The northern portion of the main site,
- An area of land that includes the old cold store,
- An area of land that includes the former Hammerside Tank

The surrender also removes the following directly associated activity from the permit:

Solvent Recovery (DAA)

Brief description of the process remaining:

This permit (operated by Glaxo Operations UK Limited) covers a pharmaceuticals manufacturing plant in Ulverston, Cumbria (National Grid Reference 3306 4778).

The plant has produced cephalosporin antibiotics and chemical intermediates for anti-viral products, but is currently solely producing antibiotics.

The site lies on the south side of the Furness peninsula in a low lying area near the estuary of the River Leven. The installation is on the site of a former iron works. The site is located 2km from the centre of Ulverston. The closest residential areas are located immediately west of the site. The nearest school is approximately 500m from the centre of the site.

The manufacturing processes include Section 4.5 Part A (1)(a) chemical conversion and product finishing, with support facilities on-site including Section 1.1 Part A (1)(a) boiler plant. The boiler plant comprises three boilers (aggregated thermal input of 113 MW), which are used to raise superheated steam. The installations comprises the main production site and a separate effluent management facility. The effluent pipelines connecting the two areas are also components of the installation.

The chemical processes give rise to point source emissions to air. Local exhaust ventilation equipment is in place to control emissions of particulates. Each boiler within the boiler plant is fitted with low NO_x burners to minimise releases of oxides of nitrogen (NO_x). Depending on the fuel burned the combustion process releases emissions of sulphur dioxide, carbon monoxide and particulates.

Aqueous waste streams are segregated into two separate systems, one for process related aqueous waste and the second for surface water. Effluent from these systems is collected in separate tidal storage tanks and discharged into the River Leven Estuary on the ebb-tide. Section 5.4 Part A (1)(a)(ii) steam stripping (distillation) is used to remove volatile organic compounds from waste water before it is discharged. Emissions to surface water following treatment include chemical oxygen demand and suspended solids.

The following habitats sites are located within 10 km of the installation: Yewbarrow Woods Special Area of Conservation (SAC), Roudsea Wood & Mosses SAC, Subberthwaite, Blawith & Torver Low Common SAC, Morecambe Bay SAC, Morecambe Bay Specially Protected Area (SPA), Morecambe Bay Ramsar, Duddon Estuary SPA and Duddon Estuary Ramsar. There are two Sites of Special Scientific Interest within 2 km of

the installation: Iron Pit Spring Quarry and Morecambe Bay. The Agency has assessed that the operation has no adverse effect on any Natura 2000 sites and it is not considered to have an adverse effect on any important ecological sites.

The operator's Environmental Management System is externally accredited to ISO 14001.

Any changes made as a result of the part surrender are set out in the schedules.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application BM4350ID	Duly made 28/02/06	Application for inorganic chemicals production plant.
Additional Information	24/07/06	Requested information received
Permit determined EPR/BM4350ID/A001	15/11/06	Permit issued
Application for variation	09/02/10	Duly made
Variation determined EPR/BM4350ID/V002	16/08/10	Variation to include two spark ignition gas engines (2 x 3.5 MWth), reduce effluent limits and remove some point source emission points to air.
Application for variation	16/12/11	Duly made
Variation determined	27/01/12	Five separate S4.1A(1)(a) activities removed
EPR/BM4350ID/V003		Variation to make a minor adjustment to the installation boundary to enable effluent re-routing revise the operating techniques for the boilers to improve emissions control and remove five specified activities and associated emission points.
Agency variation determined EPR/BM4350ID/V004	28/05/13	Agency variation to implement the changes introduced by IED
Application EPR/BM4350ID/V005	Duly made 01/10/20	Application for Medium Combustion Plant [two Medium Combustion Plant (Schedule 25A) activities]
Permit determined EPR/BM4350ID	23/11/20	Consolidated permit issued to Glaxo Operations UK Limited.
Application for partial surrender EPR/BM4350ID/S006	Duly made 24/01/2025	 Application to surrender approximately 8.0ha of land, and the following activities:- AR2: Section 1.1 A(1)(a) Burning any fuel in an appliance with a rated thermal input of 50 or more megawatts AR3: Section 5.4 A(1)(a)(ii) Disposal of non-hazardous waste with a capacity exceeding 50tonnes per day involving - physico-chemical treatment AR4: DAA Solvent Recovery

Status log of the permit				
Description Date		Comments		
		AR5 : DAA Water Cooling		
Application for partial surrender revised (following inspection by Environment Agency)	Duly made 24/01/2025 Update provided 16/05/2025	Application to surrender approximately 7.64ha of land, and the following activity: AR4: DAA Solvent Recovery		
Application amendment and further information	Update provided 16/05/2025	Changes to activities and partial surrender scope.		
	Updates provided 11/06/2025 and 13/06/2025	Updated site plan and emission points clarification		
Part surrender determined EPR/BM4350ID	Issued 19/06/2025	Part surrender complete. Consolidated permit issued in a modern format		

End of introductory note

Notice of surrender

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 and 25 of the Environmental Permitting (England and Wales) Regulations 2016 accepts the surrender in part and varies

Permit number EPR/BM4350ID

Issued to

Glaxo Operations UK Limited ("the operator")

whose registered office is

79 New Oxford Street, London WC14 1DG.

company registration number 00711851

to operate a regulated facility at

Ulverston Pharmaceuticals

North Lonsdale Road Ulverston Cumbria LA12 9DR

to the extent set out in the schedules.

This notice shall take effect from 19/06/2025.

Name	Date
Denise Horton	19/06/2025

Authorised on behalf of the Environment Agency

Schedule 1 - changes to the permit

Note: The conditions numbers used in this schedule refer to those in the consolidated permit.

The following conditions were varied as a result of the partial surrender application made by the operator:

- Condition 2.1.1 has been varied by changes to table S1.1 (by removal of activity AR4:
 Solvent recovery operations) from this table.
- Condition 2.2.1 has been varied by changes to schedule 7 (by an updated site plan).
- Condition 3.1.1 has been varied by changes to Table S3.1 (by removal of the following emission points):-

A1, A2, A3, A4, A5, A6, A7,A8, A9, A13, A14, A15, A17, A18, A19, A20, A21, A22, A23, A24, A25, A26, A27, A28, A29, A30, A31, A32, A33, A34, A36, A38, A44, A48, A49, A50, A51, A52, A56, A57, A58, A59, A60, A61, A62, A63, A71, A72, A73, A74, A75, A76, A77, A78, A79, A80, A81, A82, A83, A84, A85, A86, A87, A88, A89, A90, A91, A92, A93, A94, A95, A96, A97, A98, A99, A100, A101 - A168, A169 - A171, A172 - A177, A180, A181, A182, A183, A184, A185, A186, A187 - A192, A193, A194 and A195

The following conditions were varied as a result of an Environment Agency initiated variation:

• Correction performed to the registered office address (not a transfer) as an administrative change.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016 Permit number

EPR/BM4350ID

This is the consolidated permit referred to in the surrender notice for application EPR/BM4350ID/S006 authorising,

Glaxo Operations UK Limited ("the operator")

whose registered office is

79 New Oxford Street London WC1A 1DG.

company registration number 00711851

to operate an installation at

North Lonsdale Road Ulverston Cumbria LA12 9DR

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

Name	Date
Denise Horton	19/06/2025

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
 - (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Energy efficiency

- 1.2.1 The operator shall:
 - (a) take appropriate measures to ensure that energy is used efficiently in the activities;
 - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
 - (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

- 1.3.1 The operator shall:
 - (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities:
 - (b) maintain records of raw materials and water used in the activities;
 - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
 - (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
 - (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").

2.2 The site

2.2.1 The activities shall not extend beyond the site, being the land shown edged in red on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation ("plan") specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
 - (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.
- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1, S3.2.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.
- 3.1.4 For the following activities referenced in schedule 1, table S1.1 (AR7) the first monitoring measurements shall be carried out within four months of the issue date of the permit or the date when the MCP is first put into operation, whichever is later.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
 - (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
 - (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any

approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

3.4.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
 - (a) point source emissions specified in tables S3.1, S3.2;
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 unless otherwise agreed in writing by the Environment Agency.

3.6 Fire prevention

- 3.6.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.
- 3.6.2 The operator shall:
 - (a) if notified by the Environment Agency that the activities are giving rise to a risk of fire, submit to the Environment Agency for approval within the period specified, a fire prevention plan which prevents fires and minimises the risk of pollution from fires;
 - (b) implement the fire prevention plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

- 4.1.1 All records required to be made by this permit shall:
 - (a) be legible;
 - (b) be made as soon as reasonably practicable;
 - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and

- (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.
- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR4) A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
 - (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
 - (b) the annual production /treatment data set out in schedule 4 table S4.2; and
 - (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.
- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
 - (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
 - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
 - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.3 Notifications

- 4.3.1 In the event:
 - (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
 - (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Environment Agency, and

- (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
 - (a) the Environment Agency shall be notified at least 14 days before making the change; and
 - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.
- 4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
 - (a) a decision by the Secretary of State not to re-certify the agreement;
 - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
 - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 ac	Table S1.1 activities					
Activity reference	besoniption of specifica		Limits of specified activity			
AR1	Section 4.5A(1)(a) Producing pharmaceutical products	Production of intermediates in Cephalosporin antibiotics	Manufacture of Fortum (Ceftazidime), Zinacef (Cefuroxime sodium), Zinnat (Cefuroxime axetil), including chemical conversion, sterile production, spray drying and residue (product) recovery			
AR2	Section 1.1A(1)(a) Burning any fuel in an appliance with a rated thermal input of 50 or more megawatts	Boilers 4 & 5 with an aggregated thermal input of 100MW 2 x CHP engines each with 3.5MW net thermal input Boilers 7 & 8 (Medium Combustion Plant) each with 3.5MW net thermal input	From receipt of natural gas and gas oil to discharge of exhaust gases, and the generation of electricity and steam.			
AR3			Includes physico-chemical treatment, pH adjustment, stream stripping to remove solvent, and/or biological treatment, storage of effluent, and discharge to water at W1 and W2			
	Directly Associated Activity	/				
AR5	Water cooling	Operation of water cooling system	Operation of a series of large on-large cooling towers and a number of small roof mounted cooling towers			
AR6	Material Handling	Handling raw materials and finished product	Receipt, storage and handling of raw materials, and storage, handling and dispatch of finished products			

Table S1.2 Operating techniques			
Description	Parts	Date Received	
Application	Sections B2.1, B2.2, B2.10.16 and B2.10.19 of the Application	28/02/06	
Additional Information	Response to all questions in letter from applicant dated 21/07/06	24/07/06	
Response to IP6	Proposals submitted in response to Improvement Plan Reference IP6	30/06/10	

Table S1.2 Operating techniques				
Description	Description Parts			
Application Variation – change to boiler plant operation	Proposal to turn off EGR (Exhaust Gas Recirculation) to maintain CO and NO _x at low levels which are compliant with ELVs as proposed to the Agency in document SP3333V(ii) of Application to vary permit BM4350ID/V003	01/12/11		
Application Variation EPR/BM4305ID/V005 – Medium Combustion Plant	Sections 1.1.4, 2.1.2, 2.1.4, 2.2.1, 2.3, 3.3 of 1620008945_1_Operations Report, supporting Part C2.5 of the Application	25/08/20		

Table S1.3 Improvement programme requirements				
Reference	Requirement	Date		
IP1	A written plan shall be submitted to the Agency for approval detailing the results of review of measures used to control emissions to air from the following vent points:	Complete		
	A12, Production of CME / HME, Epivir A24 HORB, For the second lead to be a few to			
	A24, UCRP, Fortum product drying/blending vent A22, ORIT, Zinger (Zinger), and a second product and a sec			
	A43, OPIT, Zinacef/Zinnat, process vessel vent system			
	A83, Solvent Recovery Still 52 A400, O best Bound at the T400/400			
	A180, Solvent Recovery bulk storage tanks T420/422 The storage tanks T420/422 The storage tanks T420/422			
	The measures shall comply with the requirements of Section 2.2.1 and Section 3.2 of Sector Guidance Note S4.02. Where appropriate the plan shall contain dates for the implementation of individual improvements. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the plan.			
	The plan shall be implemented by the operator from the date of approval by the Agency.			
IP2	A written plan shall be submitted to the Agency for approval detailing measures to improve detection of failure or malfunction of the installed HEPA filter banks for product dryer OK process stage.	Complete		
	The measures shall comply with the requirements of Section 2.2.4 of Sector Guidance Note S4.02. Where appropriate the plan shall contain dates for the implementation of individual improvements. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the plan.			
	The plan shall be implemented by the operator from the date of approval by the Agency.			
IP3	A written plan shall be submitted to the Agency for approval detailing improvements in bunding for storage tanks T62, T63, T51 and T906.	Complete		
	The measures shall comply with the requirements of Section 2.2.5 of Sector Guidance Note S4.02. Where appropriate the plan shall contain dates for the implementation of individual improvements. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the plan.			
	The plan shall be implemented by the operator from the date of approval by the Agency.			
IP4	The operator shall complete the following improvements in abatement of emissions to air:	Complete		
	 connect vent point A9, CME, Epivir to Unit 4 Carbon Absorption Unit 			

Table S1.3 li	Table S1.3 Improvement programme requirements				
Reference	Requirement	Date			
	change the coolant supply to vent condenser on Solvent Recovery Column 44 (vent A79) to chilled water (+5°C supply)				
	The notification requirements of condition 2.5.2 shall be deemed to have been complied with upon completion of these improvements.				
IP5	A written plan shall be submitted detailing proposal for Stage 2 of the Direct Toxicity Assessment protocol for process effluent discharge. The plan shall include an outline of the dispersion model, including end points and testing methodologies. The notification requirements of condition 2.5.2 shall be deemed to have	Complete			
	been complied with on submission of the plan. The plan shall be implemented by the operator from the date of approval by the Agency.				
IP6	The operator shall undertake a study of the treatment of process effluent. The study shall identify measures to reduce the emission of chemical oxygen demand, suspended solids and ammonia. A written plan shall be submitted to the Agency for approval detailing the measures for future effluent management.	Complete			
	The measures shall comply with the requirements of Section 2.2.2 of Sector Guidance Note S4.02. Where appropriate the plan shall contain dates for the implementation of individual improvements. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the plan.				
	The plan shall be implemented by the operator from the date of approval by the Agency.				
IP7	The operator shall undertake monitoring of emissions from the new Carbon Absorption Unit (Building 14, emission points A15), having regard to Section 2.10 of Sector Guidance Note S4.02. A report shall be submitted to the Agency detailing the results obtained. The report shall include:	Complete			
	 an assessment of emissions against the requirements of the Solvents Emissions Directive 				
	 an assessment of emissions using he Agency Guidance Note H1 or equivalent methodology 				
IP8	The operator shall submit a written proposal to the Agency for carrying out a noise assessment to include both day and night time noise. The assessment shall have regard to Agency Guidance Note H3 and be in accordance with BS4142:1997. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the proposal. The assessment shall be undertaken once approved by the Agency.	Complete			
IP9	The operator shall undertake monitoring of emissions of volatile organic compounds from emission points A24, A83 and A180, having regard to Section 2.10 of Sector Guidance Note S4.02. A report shall be submitted to the Agency detailing the results obtained. The report shall include an assessment of the effectiveness of improvements implemented since permit issue.	Complete			
IP10	The operator shall update the noise assessment detailed in IP8 of the improvement programme to incorporate the newly installed CHP gas engines. The assessment should include monitoring at agreed locations and an evaluation of the effectiveness of the CHP noise attenuation / abatement measures against the design standards.	Complete			

Table S1.3 Improvement programme requirements			
Reference	Requirement	Date	
IP11	The operator shall produce as built drawings for the CHP gas engines showing the location of all pipes, drains, services and structures. The updated drawings shall be incorporated into any relevant elements of the Documented Management System such as the closure plan and Accident Management Plan. The emission point drawings should also be updated in line with the new use of A8 and A9.	Complete	
	A copy of the drawings together with a summary of any changes or updates that have been made to the Documented Management System shall be provided to the Agency.		

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels				
Raw materials and fuel description Specification				
Supply of heavy fuel oil (HFO) to boilers	HFO shall only be used			
	i) when the gas supply agreement requires supply to be interrupted, or			
	ii) when there is a failure in supply, or			
	iii) when gas balancing is required, or			
	iv) in other circumstances as agreed in writing with the Agency			
Boiler fuel	Natural gas or heavy fuel oil as specified in the Sulphur Content of Liquid Fuel Regulations 2000			

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A53	Production of UOP, Zinnat	No parameters set	No limit set	-	-	-
A64 – A69	B12 UOP vents	No parameters set	No limit set	-	-	-
A196 (A196 in Schedule 7)	Boiler 7	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	100 mg/m ³	Hourly average	Every three years	EN 14792
	Boiler 7	Carbon monoxide	No limit set	Hourly average	Every three years	EN 15058
A197 (A197 in Schedule 7)	Boiler 8	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	100 mg/m ³	Hourly average	Every three years	EN 14792
	Boiler 8	Carbon monoxide	No limit set	Hourly average	Every three years	EN 15058

Table S3.2 Point	Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements					
Emission point ref. & location	Source	Parameter	Limit (incl. unit) in aggregate	Reference Period	Monitoring frequency	Monitoring standard or method
W1 and/or W2	Surface water and process effluent via high or low BOD tidal tank	Dichloromethane	100 mg/ml	Spot sample	Four times a month	BS 6068
W1 and/or W2	Surface water and process effluent via high or low BOD tidal tank	Suspended solids	3000 mg/ml	Spot sample	Four times a month	BS 6068
W1 and/or W2	Surface water and process effluent via high or low BOD tidal tank	Suspended solids loading	6.4 tonnes/tide	One tide	Four times a month	By calculation

Emission point ref. & location	Source	Parameter	Limit (incl. unit) in aggregate	Reference Period	Monitoring frequency	Monitoring standard or method
W1 and/or W2	Surface water and process effluent via high or low BOD tidal tank	Chemical oxygen demand	4500 mg/ml or 6750 mg/l (Note 4)	Spot sample	Four times a month	BS 6068
W1 and/or W2	Surface water and process effluent via high or low BOD tidal tank	Chemical oxygen demand loading	7 tonnes/tide or 12 tonnes/tide (Note 4)	One tide	Four times a month	By calculation
W1 and/or W2	Surface water and process effluent via high or low BOD tidal tank	Total flow	8 Megalitres / 24 hours or 12 Megalitres / 24 hours (Note 4)	One tide	Continuous over each tidal discharge	Ultrasonic level detection
W1 and/or W2	Surface water and process effluent via high or low BOD tidal tank	рН	5-12	Instantaneous	Continuous over each tidal discharge	SCA ISBM 0117514284
W1 and/or W2	Surface water and process effluent via high or low BOD tidal tank	Temperature	45°C	Instantaneous	Continuous over each tidal discharge	Platinum resistance thermometer
W1 and/or W2	Surface water and process effluent via high or low BOD tidal tank	Copper	100 μg/ml	Spot sample	Four times a month	BS 6068
W1 and/or W2	Surface water and process effluent via high or low BOD tidal tank	Zinc	400 μg/ml	Spot sample	Four times a month	BS 6068
W2	Surface water run off via low BOD tidal tank, bypassing tidal tanks	Suspended solids	250 mg/ml	Spot sample	During each discharge	BS 6068
W2	Surface water run off via low BOD tidal tank, bypassing tidal tanks	рН	6-9	Instantaneous	Continuous over each discharge	SCA ISBM 0117514284
W2	Surface water run off via low BOD tidal tank, bypassing tidal tanks	Temperature	24°C	Instantaneous	Continuous over each discharge	Platinum resistance thermometer

Emission point ref. & location	Source	Parameter	Limit (incl. unit) in aggregate	Reference Period	Monitoring frequency	Monitoring standard or method
W2	Surface water run off via low BOD tidal tank, bypassing tidal tanks	Total Zinc	800 μg/ml	Spot sample	During each discharge	BS 6068
W2	Surface water run off via low BOD tidal tank, bypassing tidal tanks	Oil and grease	No visible oil or grease	Spot sample	During each discharge	Visual check
W2	Surface water run off via low BOD tidal tank, bypassing tidal tanks	Ammonia	4 mg/ml	Spot sample	During each discharge	BS 6068
W2	Surface water run off via low BOD tidal tank, bypassing tidal tanks	Flow rate	No limit set	Instantaneous	Continuous over each discharge	Ultrasonic level detection
W2	Surface water run off via low BOD tidal tank, bypassing tidal tanks	Total low per tide	No limit set	One tide	Continuous over each discharge	Ultrasonic level detection
W2	Surface water run off via low BOD tidal tank, bypassing tidal tanks	Total organic carbon	No limit set	Instantaneous	Continuous over each discharge	BS EN 1484:1997

Note 1: Discharges from any storage tank to emission points W1 and/or W2 shall be made during a period commencing 30 minutes after and ending 1 hour and 15 minutes after high tide (local time) at the point of discharge of the effluent providing the actual tide height detected at Hammerside Point exceeds7.05m above Barrow (Ramsden Dock) chart datum (ie 2.30m above Ordnance Datum). The operator shall record local high tide and height and note whenever discharges are made.

Note 2: During direct discharge, bypassing the tidal tanks, the low BOD effluent system shall be controlled by an automatic system that will divert the low BOD effluent system into the tidal storage tanks at set points specified in the monitoring protocol.

Note 3: The low BOD effluent system shall be diverted into the tidal tanks in the event of any incident on the site that could allow polluting substances to enter the low BOD system or any failure of the automatic system required by note 2.

Note 4: Alternative limits are provided for a maximum of up to 35 discharges / calendar year to cover periods when tides have restricted normal discharges.

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data				
Parameter	Emission or monitoring point/reference	Reporting period	Period begins	
Emissions to air Parameters as required by condition 3.5.1.	A196, A197	3 yearly	1 January 2021	
Emissions to water Parameters as required by condition 3.5.1	W1 and/or W2, W2	Quarterly	1 January, 1 April, 1 July, 1 October	

Table S4.2: Annual production/treatment		
Parameter	Units	
Total product produced	tonnes	

Table S4.3 Performance parameters			
Parameter	Frequency of assessment	Units	
Water usage	Annually	tonnes	
Energy usage	Annually	MWh	
Total raw material used	Annually	tonnes	

Table S4.4 Reporting forms				
Media/parameter	Reporting format	Date of form		
Air	Form air 1 or other form as agreed in writing by the Environment Agency	19/04/07		
Air	Form air 2 or other form as agreed in writing by the Environment Agency	19/04/07		
Air	Form air 3 or other form as agreed in writing by the Environment Agency	23/11/20		
Water	Form water 1 or other form as agreed in writing by the Environment Agency	14/11/06		
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	14/11/06		

Schedule 5 - Notification

These pages outline the information that the operator must provide.

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 an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	BM4350ID
Name of operator	Glaxo Operations UK Ltd
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution		
To be notified within 24 hours of	detection	
Date and time of the event		
Reference or description of the location of the event		
Description of where any release into the environment took place		
Substances(s) potentially released		
Best estimate of the quantity or rate of release of substances		
Measures taken, or intended to be taken, to stop any emission		
Description of the failure or accident.		

(b) Notification requirements for the breach of a limit		
To be notified within 24 hours of detection unless otherwise specified below		
Emission point reference/ source		
Parameter(s)		
Limit		
Measured value and uncertainty		
Date and time of monitoring		
Measures taken, or intended to be taken, to stop the emission		

Time periods for notification following detection of a breach of a limit			
Parameter	J		Notification period
(c) Notification requirements for t	the breach of per	mit conditions not relate	d to limits
To be notified within 24 hours of de	-		
Condition breached			
Date, time and duration of breach			
Details of the permit breach i.e. what happened including impacts observed.			
Measures taken, or intended to be taken, to restore permit compliance.			
(d) Notification requirements for	the detection of a	anv significant adverse e	nvironmental effect
To be notified within 24 hours of		,,,	
Description of where the effect on the environment was detected			
Substances(s) detected			
Concentrations of substances detected			
Date of monitoring/sampling			
Part B – to be submit	ted as soo	n as practicable	•
Any more accurate information on to notification under Part A.	he matters for		
Measures taken, or intended to be t a recurrence of the incident	Measures taken, or intended to be taken, to prevent a recurrence of the incident		
limit or prevent any pollution of the	Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission		
The dates of any unauthorised emis facility in the preceding 24 months.	ssions from the		
Name*			

Post	
Signature	
Date	

^{*} authorised to sign on behalf of the operator

Schedule 6 - Interpretation

"6 monthly" for monitoring / reporting means after/during each 6 month period, January to June and July to December and when monitoring with at least 8 weeks between each sampling date.

"accident" means an accident that may result in pollution.

"annually" means once every year.

"application" means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

"authorised officer" means any person authorised by the Environment Agency 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(4) of that Act.

"disposal". Means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

"emissions to land" includes emissions to groundwater.

"emissions of substances not controlled by emission limits" means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

"EP Regulations" means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

"fugitive emission" means an emission to ait, water or land from the activities which is not controlled by an emission limit.

"groundwater" means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

"Hazardous property" has the meaning in Annex III of the Waste Framework Directive.

"Hazardous waste" has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005.

"Industrial Emissions Directive" means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

"MCERTS" means the Environment Agency's Monitoring Certification Scheme.

"Medium Combustion Plant" or "MCP" means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW.

"Medium Combustion Plant Directive" or "MCPD" means Directive 2015/2193/EU of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

"one tide" means the period between two consecutive high tides.

"quarterly" for monitoring / reporting means after/during each 3 month period, January to March; April to June; July to September and October to December and when monitoring, with at least 4 weeks between sampling dates.

"recovery" means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

"site protection and monitoring programme" means a document which meets the requirements for site protection and monitoring programmes described in the Land Protection Guidance.

"solvent recovered" means the quantity of organic solvent recovered and reused as solvent input into the process.

"spot sample" means a single representative sample.

"Waste Framework Directive" or "WFD" means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

"year" means calendar year ending 31 December.

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

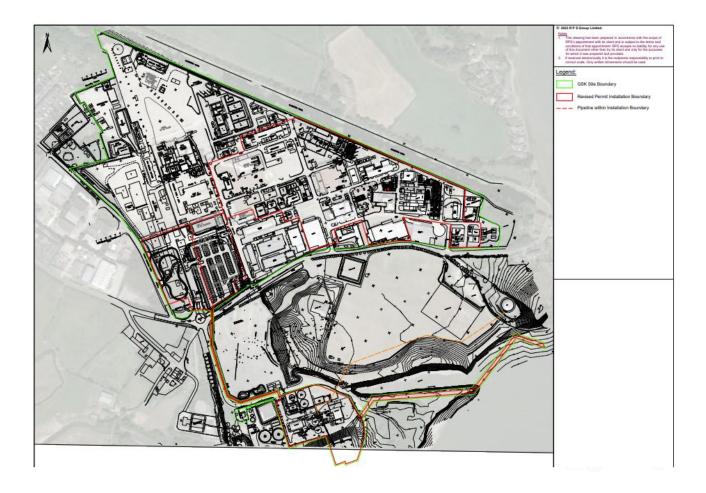
 in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels other than gas engines or gas turbines, 6% dry for solid fuels; and/or

in relation to emissions from gas engines or gas turbines, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 15% dry for liquid and gaseous fuels; and/or

• in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

Schedule 7 – Site plan

Revised Permit Installation Boundary



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Permit Nur	mber: BM4350ID	BM4350ID		Operator:		Glaxo Operations UK Limited		
Installation:	Ulverston Pharmaceuticals		Form Number: Air3 (23/11/2020)					
Report	ing of Emission	s to Air f	or the perio	od from		to		
Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result	Test Method	Sample Date and Duration ^[1]	Uncertainty [2]	
A196	Oxides of nitrogen (NO and NO2 expressed as NO2)	100mg/m ³			EN 14792			
A196	Carbon monoxide	N/A			EN 15058			
A197	Oxides of nitrogen (NO and	100mg/m ³			EN 14792			

EN 15058

N/A

Signed		Date	
	(authorised to sign as re	epresentative of the Operator)	

Carbon monoxide

A197

^[1] For non-continuous measurements the date and duration (hours) of the sample that produced the result is given. For continuous measurements, or, the percentage of the process operating time covered by the result is given.

^[2] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.