

# Environment Agency permitting decisions

## Surrender

We have decided to accept the surrender of the permit for BBC TV Centre operated by Interserve Facilities Management Limited.

The permit number is EPR/CP3032EA.

We are satisfied that the necessary measures have been taken to avoid any pollution risk and to return the site to a satisfactory state.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements.

## Purpose of this document

This decision document:

- explains how the operator's application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account

## Structure of this document

- Key issues
- Annex 1 the decision checklist

## Key issues of the decision

### Background

The installation is located at Wood Lane, West London, W12 7RJ. The permit for the facility contained one listed activity - a Section 1.1 A (1) (a) activity: burning any fuel in an appliance with a rated thermal input of 50 megawatts or more. The site also had two directly associated activities, namely water demineralisation and the operation of one heat recovery steam generator.

All activities related to the permit are no longer in operation. All fuel sources for the installation plant have been removed from the site so as to ensure no remaining pollution risk. The main gas line to the site has been terminated. The conditions of the permit have not been breached at any time during the operational phase of the facility. No pollution incidents have occurred that have impacted land or groundwater.

## Decommissioning Plan and Pollution Risk

All decommissioning activities at the site were in line with the approved site closure plan.

The Operator has submitted a site closure plan which demonstrates that all site kit and equipment associated with the activities undertaken at the site have been decommissioned to an acceptable standard. Decommissioning included the following actions:

- Pipelines and vessels were flushed out and completely emptied of any potentially harmful contents
- Pipes which contained significant quantities of oils or chemicals were carefully drained and capped to prevent spillage
- Tanks were fully drained before being taken out of use or removed by suitably qualified technicians
- After decommissioning, areas were checked to ensure that no soil or groundwater contamination had occurred (including the taking of soil and groundwater samples).

Furthermore, all fuel oil pipework in buildings was above ground which enabled easy oversight for potential leaks in service and during decommissioning.

We have assessed the Operator's final site condition report to demonstrate that no pollution has occurred to ground. The Operator was required to undertake background monitoring when the permit was first issued, but due to the nature of activities and the protection measures provided by the Operator, ongoing monitoring was not required by the permit. We have assessed the final site condition report and consider the state of the ground to be sufficient to allow the permit to be surrendered without any remediation works, i.e. we have not found evidence of contamination due to the activities carried out on site.

An intrusive ground investigation was carried out by Johnson Control Limited in June 2007 in accordance with the Site Protection and Monitoring Programme (SPMP) which included an investigation into soil condition and groundwater. Three boreholes (BH2, BH3 and BH4) were placed in strategic locations relating to the four back up fuel tanks within the site. Each of these tanks could hold up to 125,000 litres of fuel oil and were therefore considered to have the most potential as a pollution source on site. Low concentrations of aromatic and aliphatic hydrocarbons were found in the ground materials encountered throughout BH2 and at depth in BH4. These were recorded at levels considerably lower than the commercial/industrial Soil Guideline Values outlined in the Contaminated Land Exposure (CLEA) model. No hydrocarbon contamination was present in any ground water samples or in the ground materials in BH3. The low levels encountered were attributed to leaching and vertical migration of residual hydrocarbons within the Made Ground of the site rather than to spillage or leakage from the backup fuel tanks.

Groundwater monitoring in the three boreholes took place on the 7<sup>th</sup> March 2014. A low concentration of total petroleum in borehole BH3 was detected below laboratory limits of detection. Within borehole BH2 and BH4 low levels of hydrocarbons were identified, consistent with levels of the previous groundwater monitoring in 2007. Given the low levels it can be concluded that these hydrocarbons are indicative of leached contamination from the Made Ground and not from leaching from the backup fuel tanks. Also, the tanks were inspected internally for any risk of loss of containment (such as rusting or thinning) and they were found to be in good condition. The small fuel oil tanks in the emergency generators were also independently isolated within the containerised units. Therefore, it can be concluded that the potential source of the hydrocarbons historically sampled in the Made Ground and the groundwater is not from the known permitted sources which have been contained throughout.

We are satisfied that the decommissioning plan has been followed and the site has been decommissioned to an acceptable standard with no evidence of pollution or potential pollution pathways. Therefore, the surrender of the permit will not lead to pollution of the environment.

### **Acceptable State**

We deem the site to be in an acceptable state to surrender the permit in accordance with the application made by the Operator. We have visited the site a number of times over the operation of the permit and confirm that the site has been operated in accordance with all permit conditions and in a way so as to avoid pollution of the environment. Our inspections indicated that all site equipment had been maintained throughout the operation of the permit and all structures had been kept in good operational order. Our final site inspection confirms that the decommissioning has now been completed as well as the removal of the combustion plant to well below the requirement for a permit. Therefore the permit can be successfully surrendered.

## Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/notice.

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>The site</b>		
Extent of the surrender application	The operator has provided a plan showing the extent of the site of the facility that is to be surrendered.  We consider this plan to be satisfactory.	✓
Pollution risk	We are satisfied that the necessary measures have been taken to avoid a pollution risk resulting from the operation of the regulated facility.	✓
Satisfactory state	We are satisfied that the necessary measures have been taken to return the site of the regulated facility to a satisfactory state.  In coming to this decision we have had regard to the state of the site before the facility was put into operation.	✓