

Permitting decisions

Surrender

We have decided to accept the surrender of the permit for Harrow Combined Heat and Power Plant operated by Kodak Alaris Limited.

The permit number is EPR/KP3931NL.

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 provides a record of the decision making process. It summarises the decision making process in the decision checklist to show how all relevant factors have been taken in to account.

This decision document provides a record of the decision making process. It:

- highlights [key issues](#) in the determination
- summarises the decision making process in the [decision checklist](#) to show how all relevant factors have been taken into account

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit and the surrender notice. The introductory note summarises what the notice covers.

Key issues of the decision

The applicant, Kodak Alaris Limited, has provided an application for full surrender with supporting evidence that comprises:

- Document entitled 'Surrender Site Condition Report, document report number 934628, dated February 2017 and prepared by GHD Environment Limited.
- Appendix A: Supporting Information – historical and application stage:
 - Appendix A1 – Drainage plans
 - Appendix A2 – Application support information
 - Appendix A3 – Aspects, impacts and analysis
 - Appendix A4 – Phase I executive summary
 - Appendix A5 – Environmental risk assessment

- Appendix A6 – PCBs
- Appendix B: Supporting Information – operational phase:
 - Appendix B1 – Aspects, impacts and analysis
 - Appendix B2 – Spill procedure
 - Appendix B3 – Inspection records
 - Appendix B4 – Environmental audits
 - Appendix B5 – Diesel spill incident records
 - Appendix B6 – Enviroguards incident reports
 - Appendix B7 – Borehole locations, logs, data and photographs
 - Appendix B8 – Groundwater data
- Appendix C: Supporting Information – decommissioning and surrender:
 - Appendix C1 – Site closure plan
 - Appendix C2 – Decommissioning risk assessments and method statements
 - Appendix C3 – Decommissioning reports
 - Appendix C4 – Other decommissioning documentation
 - Appendix C5 – Photographic record post-decommissioning

The permit for Harrow Combined Heat and Power Plant operated by Kodak Alaris Limited has been surrendered due to the operator entering into a redevelopment agreement with Land Securities to redevelop the wider Kodak facility. The entire site is the subject of an outline planning application (reference P/2165/15), which was approved in November 2015, for the demolition of the existing buildings and structures, and phased mixed-use redevelopment comprising of residential, student accommodation, employment, community, education and retail uses together with supporting social, transportation and amenity related infrastructure.

Operations at the Kodak site ceased in November 2016, and decommissioning began for all manufacturing and utilities operations. All hazardous materials were removed from the site and all equipment, vessels, tanks, pipework, bunds and sumps were inspected and cleaned. The decommissioning and shutdown programme was completed at the end of February 2017.

The surrender application and supporting documentation submitted aimed to demonstrate that the permitted installation has been returned in a satisfactory state. Following our review of the surrender application and supporting information we, the Environment Agency, are satisfied that the operator, has provided sufficient evidence to demonstrate that the permitted Harrow Combined Heat and Power Plant installation has been returned to a satisfactory state.

Further details are provided within the Site Condition Report Evaluation Template and it should be read in conjunction with this decision document.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	<p>We have not identified information provided as part of the application that we consider to be confidential.</p> <p>The decision was taken in accordance with our guidance on confidentiality.</p>
The site	
Pollution risk	<p>We are satisfied that the necessary measures have been taken to avoid a pollution risk resulting from the operation of the regulated facility.</p> <p>Any historical contamination (if present) will be addressed during demolition and remediation of the wider Kodak facility, to the standards detailed in the Remediation Strategy which was submitted to Harrow Borough Council with the Planning Application in 2015. As no site investigation fully characterises a site and not all of the site area was accessible during the investigations to date, a site investigation may be required to establish ground conditions as part of the redevelopment which may indicate that remediation may be required. We will continue to be involved as a statutory consultee during the planning process.</p>
Satisfactory state	<p>We are satisfied that the necessary measures have been taken to return the site of the regulated facility to a satisfactory state.</p> <p>In coming to this decision we have had regard to the state of the site before the facility was put into operation.</p>