

Environment Agency permitting decisions

Surrender

We have decided to accept the surrender of the permit for Chippenham Drive operated by Alanod Limited.

The permit number is EPR/QP3231PY.

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 Chippenham Drive, Kingston, MK10 0AN. The permit for the facility contained three listed activities. A 2.3A (1) (a) activity – Surface treating of metals and plastic materials using an electrolytic or chemical process for the brightening and anodising of aluminium sheet in a reel to reel process. A 5.3 A(1) (c) activity – disposal of non-hazardous waste in a facility with a capacity of more than 50 tonnes per day by physico-chemical treatment via an effluent treatment plant with an authorised capacity of 1200m³/day. A 4.2 A (1)(a)(iii) activity – producing inorganic chemicals such as calcium hydroxide by slaking lime for use in the effluent treatment plant.

The site also had a directly associated activity, namely the operation of a 2.4 MW gas fired boiler. The site was operated on a 24 hour, 7 day basis. Operations were confirmed to have been mothballed in 2010. The Operator has since decided to surrender the permit in full.

Decommissioning Plan and Pollution Risk

The Operator has submitted a decommissioning 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 was undertaken in two separate phases which included the following actions:

Phase 1

- Removal of all chemicals from site;
- Cleaning of all process equipment to a standard where any potential for environmental harm was removed; and
- Treatment of equipment to a standard where it would be safe to move, use or scrap at a later date.

All chemicals were run down prior to mothballing and residual chemicals were diluted and processed through the effluent treatment plant prior to discharge to sewer. We are satisfied that potential sources of pollution have been removed from site and we have confirmed that this was undertaken in such a way that no pollution occurred during the removal and flushing of chemicals, therefore any potential ongoing sources for pollution has been sufficiently removed.

Phase 2

- Removal of items of coil handling plant for recycling elsewhere;
- Removal of items of process equipment for recycling elsewhere;
- Removal of items of plant for onward sale;
- Scraping or disposal of residual items;
- Establish the under-floor condition of two previously capped storage sumps and to remediate these if required; and
- Spot sampling of the floor to ensure that seepage of hazardous chemicals did not occur during the operation of the permit.

The brightener storage sump was dug out until concrete was reached. The sump was then flushed to the effluent reception pit and the flushed material was taken off site for disposal. The anodiser sump was also dug out and the concrete removed to determine the condition of the substrate. The substrate beneath was still considered to be impervious to water and was therefore not considered to be a potential source for ground pollution. Both sumps have been subsequently in-filled with hardcore to ground level and are no longer considered to be sources of pollution.

All equipment was well maintained during the operation of the permit and we do not hold any records of pollution events. The operator has complied with all permit conditions over the lifetime of the permit (including improvement conditions) and has ensured that the site was operated in accordance with permit requirements.

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 provided by the Operator, ongoing monitoring was not required through the permit. We have assessed the final site condition report and consider the state of the ground to be sufficient to allow the site to be surrendered without any remediation works, i.e. we have not found evidence of contamination due to the activities carried out on site.

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. All potential sources of pollution have been removed from the site 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 grant the surrender 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 indicate that all site equipment has been maintained throughout the operation of the permit and all structures have been kept in good operational order, including concrete sumps, floors and chemical storage areas. Our final site inspection confirms that the decommissioning has now been completed and all potential sources of pollution have been removed from the site, 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
The site		
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.	✓