

Permitting decisions

Surrender

We have decided to accept the surrender of the permit for **Acetate Manufacture –Spondon** operated by **Celanese Production UK Limited**.

The permit number is **EPR/MP3033UJ**

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:

- Provides an overview of the site and operational monitoring programme
- 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.

Site overview

The site is located in a mixed urban and industrial area approximately 4 km south east of Derby city centre.

The installation undertook a chemical process permitted under the following scheduled activities:

Table S1.1 activities		
Activity listed in Schedule 1 of the EPR Regulations	Description of specified activity	Limits of specified activity
S4.1 A(1) (a) (viii)	Manufacture of Cellulose Acetate Flake (CAF)	From receipt of raw materials to transfer for storage of Cellulose Acetate Flake (CAF)
S4.1 A(1) (a) (ii)	Manufacture of Acetic Anhydride	From receipt of raw materials to transfer for use or storage of acetic anhydride
S5.4 A(1) (a) (ii)	Effluent Treatment Plant	From receipt of process effluent to the discharge of treated effluent to private and public sewer

This installation was permitted initially in 2006 under permit EPR/BK52071P (operator Acetate Products Limited) and transferred to Celanese Acetate Limited in 2007 under the current permit EPR/MP3033UJ. The same legal entity has operated the installation since 2007. In 2016 the variation EPR/MP3033UJ/V004 introduced administration changes including an operator name change to Celanese Production UK Limited and registration address change but the legal entity was unchanged.

There has been no change to the installation boundary since the original permit issue. There have been no operational changes introduced with the variations.

Variation application details are as follows:

- EPR/MP3033UJ/V002 substantial variation application – was withdrawn by the operator in 2011
- EPR/MP3033UJ/V003 – was a variation to apply the Industrial Emissions Directive changes to the permit
- EPR/MP3033UJ/V004 – as above limited to administration changes to operator registration name and address details.

The permitted activities manufacturing ceased on November 23rd 2012.

Key issues of the decision

The key issue for this determination is whether the operator has demonstrated that the legal test for surrender has been met in that the necessary measures have been undertaken to **avoid a pollution risk** resulting from the operation of the regulated facility and return the site of the regulated facility to a **satisfactory state**, having regard to the state of the site before the facility was put into operation.

History of events since cessation of operations is as follows:

- The plant chemical inventory removal and decontamination work took place from Dec 2012 until August 2014.
- Site Investigation Reports were completed for each of the zones of the installation in 2014.
- Specific Delineation Site Investigation and Groundwater Monitoring for Zone 2 East and Bore Hole BH407A took place and a report submitted in September 2015
- Site Condition Report dated October 2015 – this resulted in the identification of three areas where elevated monitored levels were found and remedial work was considered to be required. These areas were as follows:
 - Zone 2 East- North -Soil Contamination (Benzene).
 - Zone 2 East- South - Soil Contamination (Benzene)
 - Zone 7- Acetic Acid around Bore Hole BH407A- Perched Groundwater Contamination (Acetic acid).
- Remedial Strategy for Environmental Works was completed in November 2016 and the scope was agreed by the Environment Agency.
- Final baseline specific focused monitoring carried out in April 2017 to provide data to justify success of remedial action in removing ground water and land contamination ; data supplied as part of Remediation Verification Report dated May 2017 in section 2.4.3 and summarized in section 3.
- Our area compliance team site visit on May 24th 2017 confirmed that all waste and raw materials linked to the permitted activities had been removed from the installation. We further confirmed that the decommissioning and decontamination of all equipment linked to the installation was complete to a satisfactory standard by this date.
- Dismantling of buildings, with equipment already dismantled and decontaminated, continues with a final target completion date of November 2017.

Conclusion

We accept after the site visit dated May 24th 2017, that the installation has been returned to a satisfactory state for surrender. Specifically we accept remediation work has been successful in returning site back to an acceptable level agreed for permit surrender (relevant areas include Benzene North, Benzene South and Acetic Acid Sump).

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential.
The site	
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	<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>