

Environment Agency permitting decisions

Part surrender

We have decided to accept the surrender of part of the permit for Coventry Di-isocyanate, 4 Golden Acres Lane operated by Notedome Limited.

The permit number is EPR/QP3139LG.

The part surrender number is EPR/QP3139LG/S004.

This was applied for and determined as a part surrender.

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
- justifies the specific conditions in the permit as a result of the partial surrender

Structure of this document

- Key issues – Pollution Risk and Site Closure
- Annex 1 the decision checklist

Key issues of the decision

Pollution Risk

The principal permitted activity carried out at the installation is the production of Polyurethane Prepolymers and systems. The process involves the melting of raw material overnight in ovens followed by a reaction process in stainless steel stirred reaction vessels. Product is then packed into steel 25 or 200 litre drums for sale.

Following the purchase of a larger factory to the rear of the existing premises, Unit 52 Herald Way and associated land (which was solely used as a warehouse) has been surrendered. The new factory, Unit 4 Golden Acres Lane, is now the sole warehouse for the site. This warehouse was included to the Permit as part of a previous permit variation in 2011 (EPR/QP3139LG/V002).

During the duration of occupancy by Notedome Limited the unit was solely used for warehousing and no listed activities took place. The potential sources of contamination associated with the activities in Unit 52 are listed below:

- Raw material storage; and
- Manufactured product storage.

The primary hazards associated with the potentially contaminating substances were spillage during delivery, use of materials or failure of containment leading to spillage.

Raw materials were stored within 25 litre and 200 litre steel drums. All goods were visually checked for damage on receipt and thus not liable to leaks or contamination. The unit was covered by hardstanding, drain covers, drum puncture kits and spill kits were in place. Operators were trained in spill response and appropriate accident management plans were in place.

A database was used to manage and record all routine checks and preventative maintenance activities.

The Application Site Report (ASR) submitted with the original permit application in January 2006 concluded that due to the low likelihood of significant land contamination occurring across the installation, collection of reference data to assess the extent of soil and groundwater contamination when the permit was issued was not required for the site. The permit requires the operator to implement and operate a Site Protection and Monitoring Programme (SPMP) which covers Unit 52.

The Operator confirmed in the supporting documentation submitted with the partial surrender application that;

- the unit was sold in 2013 after a full inspection of the site;
- all decommissioning work has been completed; and
- all pollution risk has been removed from the site.

Site Condition

The Operator has submitted a Site Closure Report, which included details of the condition of Unit 52 at closure. The main elements of the report are summarised below:

Environmental Setting

The original PPC application ASR included a satisfactory description of the environmental setting of the installation.

Changes to Activities

There have been no significant changes to activities since permit issue. No additional dangerous or potentially polluting substances were introduced to the site during the operation of the unit.

Measures Taken to Protect Land

An Accident Management Plan has been maintained at the site to manage potential major and minor incidents. The permit required the development of a SPMP and maintenance of the plan during operation.

The Environment Agency considers that the preventative measures implemented during the operation of the unit, including those incorporated into the SPMP, were satisfactory and demonstrate that pollution of the land at the installation has been prevented.

Pollution Incidents

The Operator has confirmed that there are no recorded pollution incidents within the area of land to be surrendered.

Decommissioning and Removal of Pollution Risk

The site was cleared of all raw materials and finished goods. Raw materials were removed by return, resale or disposal. The manufactured product was also made for sale or disposal. All concrete and tarmac areas were inspected for damage or deterioration and all hardstanding areas were cleared of debris. The inspection report submitted with the application stated that:

- there were no areas of surface contamination;
- all surfaces were intact and in a good state of repair;
- all bunds were intact; and
- a history of repairs had been maintained.

Reference Data

The operator has not submitted soil or groundwater samples for the surrender site condition report. No samples were taken previously as baseline data for the area. The operating techniques minimised risk to the environment at the site, raw materials and finished goods were stored in suitable containment

and located on non-permeable ground. No incidents / spillages have been recorded.

We accept there was no significant source-pathway-receptor mechanism for pollution of the ground water or soil from the activities carried out within the warehouse and agree that taking soil and groundwater samples through the hardstanding within the unit is not necessary.

Condition of the Site at Closure

The Operator has confirmed in the Site Condition Report that:-

- all activities have ceased;
- the pollution risk has been removed; and
- no significant pollution has resulted from the activities indicating that the condition of the land has not deteriorated during the lifetime of the permit.

We are satisfied that the decommissioning activities were conducted in such a way that the risk of pollution was minimised and there is no evidence of contamination/deterioration to the underlying land as a consequence of these activities. We therefore agree that the pollution risk has been removed for the purpose of surrender.

We have previously stated that:

- We consider that the preventative measures implemented during the lifetime of the permit, including those incorporated into the SPMP, were satisfactory and demonstrate that significant pollution of the land at the installation has not been likely.
- No pollution incidents have been reported for the site.
- We are satisfied that there have been no significant changes to the installation boundary or activities since permit issue, other than the shutdown of the activities for site closure, and that no additional dangerous or potentially polluting substances were introduced to the site during the life of the permit.
- We are satisfied that the decommissioning activities were conducted in such a way that the risk of pollution has been removed and there is no evidence of deterioration to the underlying ground.

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 facility		
The regulated facility	The permitted regulated facilities have not changed as a result of the partial surrender.	✓
The permit conditions		
Changes to permit conditions	The permitted installation boundary has changed as a result of the partial surrender. No other permit conditions have changed.	✓
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.	✓