

Environment Agency Permitting Decisions

We have decided to accept the surrender of the permit for Citigen CHP Charterhouse Street by Citigen (London) Ltd.

The permit number is EPR/ZP3431SZ

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 check list

Key Issues of the decision

Permit History

The installation, operated by Citigen (London) Limited, was permitted as a Section 1.1 A(1) (a) activity in March 2007. It involved the operation of two compression ignition engines with a total thermal input capacity of 78MW, running on either gas with 5% gas oil or 100% gas oil. Three standby water boilers of total thermal input capacity of 9MW are used to cover for breakdowns and maintenance. Directly Associated Activities included a Cooling water system and a Water Softener

Each compression engine drove a 16 MW(e) electrical generator set. The engines, which were fitted with turbo-charging systems to improve their efficiency, were cooled by a water cooling system. Oil was used for lubrication and was cooled by a closed circuit cooling system. Waste heat from exhaust gases, the engine cooling system, turbochargers cooling system and lubricating oil was recovered by a heat exchanger system to produce up to 28 MW(th) hot and chilled water for buildings around the City of London. Excess waste heat was discharged into the atmosphere through roof mounted cooling towers.

The surrender application arises from the replacement of the majority of existing plant with two 4.3MWe gas CHPs of individual thermal input capacity of less than 20MW. Because the replacement combustion plant is less than 50MW and there is no individual unit larger than 20MW, there will be no requirement for an Environmental Permit for the new CHP. Furthermore, because operations on site shall continue, decommissioning is confined to the listed activity itself and the raw materials it required

This comprises:

- 2 x 39MW(th)Compression Ignition Engines.
- 1,000,000 Litre Diesel storage tank.
- 16,000 Litre Diesel storage tank.
- 49,000 litre ammonia tank and emissions control plant.
- Gas compressors and associated piping.

The Application Site Report (ASR) in the original Permit application identified little likelihood of pollution and intrusive monitoring data was not required. A low risk surrender was therefore possible provided sections 4 - 10 of the Surrender SCR (Site Condition Report) demonstrate the approved SPMP (Site Protection and Monitoring Programme) has been maintained, no pollution of ground/groundwater has occurred throughout the life of the Permit and this is verified by inspection of the site after the CHP engines and storage tanks have been decommissioned and the CHP engines removed.

Consultation with GWCL

Because there were no sensitive controlled waters receptors in the vicinity, the Area GWCL team raised no comments on the Surrender application.

Integrity Inspections

A Table D2A/2B assessment of the likelihood of land pollution was submitted with the application. This was supported by records of integrity inspections of primary, secondary and tertiary containment measures for all polluting substances stored on site.

Record of Pollution Incidents

Section 6 of the Surrender SCR contains details of pollution incidents throughout the life of the Permit. Records of all environmental incidents and complaints are maintained on a database. The records demonstrate there have been no pollution incidents identified that could have resulted in pollution to land during the life of the Permit. The database is available for inspection. The SCR also identifies all notifications since the Permit was issued. There have been four such incidents. Three of these concern emissions to air and the other is a late submission of a report.

We are satisfied the record of pollution incidents demonstrates there has been no pollution of the ground during the lifetime of the permit.

Decommissioning

Decommissioning of process plant and equipment began in 2012. Tanks had been emptied of raw materials and cleaned out by the end of the same year. Copies of tank inspection reports, tank cleaning and waste transfer records were included in the surrender application. Evidence of pollution prevention during the life of the Permit was provided by an SPMP internal Audit report dated November 2013 (appendix 4) and a bund inspection report dated September 2013 (Appendix.6). Removal of pollution risk was supported by tank inspection records, cleaning records and waste transfer documentation. Evidence of decommissioning and removal of the Compression Ignition Engines from site was provided by additional information received on 14/04/2014 as Appendix 8. This was supported by photographic evidence and a site inspection CAR report dated 12/05/2014, which verified decommissioning was complete, potentially polluting materials had been removed and there was no evidence of pollution to ground.

Evidence of returning the site to a satisfactory state

We are satisfied the Operator has demonstrated that the site of the regulated facility has been returned to a satisfactory state, having regard to the state of the site before the facility was put into operation.

Annex 1: decision checklist

Activity	Justification / Detail	Determination criteria met
		Yes
The site		
Extent of the surrender application	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility that is to be surrendered.	✓
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.	✓