

Environment Agency Permitting Decisions

Part surrender

The Environment Agency has decided to accept the surrender of part of the permit for Gaskill Road, Speke Vaccines operated by Novartis Vaccines and Diagnostics Limited.

The permit number is BS5401IK and the notice of partial surrender is EPR/BS5401IK/S007

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.

The part surrender allows for the closure of sites 1 and 2 with continuation of part of site 3 and site 4 within a single installation boundary.

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

Annex 1 the decision checklist and Key Issues

Key Issues of the decision

The original permit was determined in 2006. The original installation consisted of four sites (1 to 4). In May 2011 a part surrender was issued (EPR/BS5401IK/S005) to remove sites 1 and 2 from the installation boundary.

With this new part surrender the operator is applying to cease site 3 pharmaceutical production and remove site 3 facilities from the installation, except a material warehouse and heating and cooling small scale boilers for the warehouse (A11 emission revised with source being five boilers with total 0.675 MW thermal input). Site 4 remains unchanged within installation boundary.

The installation boundary has been reduced to remove the site 3 production facilities, in error, during EPR/BS5401IK/S005 part surrender. At that time the production operations had ceased but the EPR/BS5401IK/S005 part surrender site condition report did not include the part surrender of the site 3 production facilities.

Overall the installation boundary remains unchanged with this part surrender.

Site 3 pharmaceutical production ceased in April 2011. The decontamination of plant was completed by the end of August 2011. Once all equipment assets were disposed of the remaining infrastructure of the secondary manufacturing facility was then reduced to an external building shell. The full removal of all materials from surrendered facilities was completed by 8th May 2012.

The installation has been well designed with hard standing throughout, and storage tanks bunded. The installation has an on-site effluent treatment facility to minimise sewer emissions. The use of mercury within the process has been one of main issues in terms of ensuring containment of mercury and minimisation of mercury levels in sewer discharge (emission limit value of 10 µg/l).

There have been incidents within the life of the permit; listed in Table 5-4 of surrender site condition report for site 3.

Those will potential for environmental impacts include:

- a. Mercury discharge to sewer above Emission Limit Value;
- b. Warehouse spillages; these were onto hard standing and cleaned up with no environmental impact;
- c. Diesel fuel spillages; spillages onto hard standing and into sumps. Collected in sumps and drainage systems without discharge to sewer.

The operator has implemented an on-going programme of improvements throughout the life of the permit to contain mercury by splitting discharges into those with and without mercury. Mercury laden liquors have been disposed of and not discharged to sewer. The operating procedures have been regularly updated and audited to minimise risk of accidental discharge of mercury laden waste to sewer. Overall although there have been some exceedances of mercury emission limit value to sewer, the usage of hardstanding and storage tanks for mercury waste has prevented mercury discharge to groundwater and land, plus the testing of drain integrity, as discussed below, has minimised risk of egress to ground water.

Within the original permit a Site Protection and Monitoring Program was required, which has been implemented since 2007. This has been included in application supporting document Table 5-3 with appendix B providing details as evidence of execution of this plan. The plan included hard standing, equipment, bunding and drain CCTV surveys to ensure drain integrity, with follow up improvements as required.

Decommissioning consisted of cleaning in place procedures prior to equipment dismantling and removal, along with disposal of all waste and raw materials. The details are provided in section 8 of the application supporting document.

Overall we are confident that contamination of groundwater and land due to installation activities on site 3 during the life of the permit is negligible. The operator has provided photographic evidence (within appendix A of supporting application document) of equipment and materials being removed and the site consisting of a facility with hardstanding alone on the surrender installation land. This evidence supports the operator site condition report conclusions that the surrender area has been returned to a satisfactory state.

As such the Environment Agency agrees that site 3 has been returned to a satisfactory state.

In terms of environmental impacts the removal of site 3 processing activities from the installation will reduce environmental impacts specifically with respect to:

- Mercury emissions to sewer (S5 process discharge stopped complete with handling of mercury linked to site 3 operations).
- Combustion emissions to atmosphere (removal of 1.4 MW gas fired boiler).

Annex 1: decision checklist

Aspect considered	Justification / Detail	Criteria met
		Yes
Receipt of submission		
Confidential information	There has been no claim for commercial confidentiality.	✓
Identifying confidential information	No confidential information has been identified.	✓
The facility		
The regulated facility	The permitted regulated facilities have changed as a result of the partial surrender. Site 3 has been removed from the installation facilities except from a raw material warehouse and diesel generator. Site 4 in full remains part of installation boundary. Overall the installation boundary remains unchanged.	✓
The permit conditions		
Changes to permit conditions (part surrender only)	The permit has been updated into a consolidated permit with modern conditions including changes introduced with Industrial Emissions Directive (IED). The following key changes have been made to reflect the partial surrender: <ul style="list-style-type: none"> • Activities Table S1.1 has been updated to remove site 3 boiler and update main pharmaceutical activity definition in light of IED. • Operating techniques Table S1.2 has been updated to clarify scope of partial surrender. There are no changes to operating techniques linked to remaining operations. • Table S3.1 air emissions: reflects revised air emissions points and monitoring requirements. • Table S3.3 reflects revised effluent monitoring requirements (S5 is no longer a process discharge but emissions consist of surface water only). • Tables S4.1, S4.2 and S4.3: reflects revised reporting requirements 	✓
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 and an amended site plan has been included in schedule 4 of the partial surrender notice. We are satisfied that the necessary measures have been taken to avoid a pollution risk resulting from the operation of the regulated facility.	✓
Pollution risk	A partial surrender site report was included with the application including an update site condition report relating to site 3 for this partial surrender. The keys issues section of this document discusses the site condition report in more detail. 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. This is based on review of site condition report and photographic evidence showing the site being cleared received with this application.	