

## Environment Agency permitting decisions

### Part surrender

We have decided to accept the surrender of part of the permit for Sherrington Way Chemical Works operated by Leverton-Clarke Limited.

The permit number is EPR/AP3838SH.

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

Unit 16 Sherrington Way has been used as a manufacturing plant and laboratory facility by Leverton-Clarke Limited since 25th March 1985 and it has been occupied on a 25 year lease. Since 2010, Leverton-Clarke has also taken leases for Units 13,14 and15 Sherrington Way and the present manufacturing plant and laboratory have been relocated to Units 14 and 15. Unit 16 has been vacated and will be returned to the landlords of the building. Decommissioning of this unit has followed the company site closure plan detailed below;

*Stage 1) Disposal/removal of product and waste from the installation.*

*Stage 2) Clean, dismantle and remove vessels and equipment from the installation.*

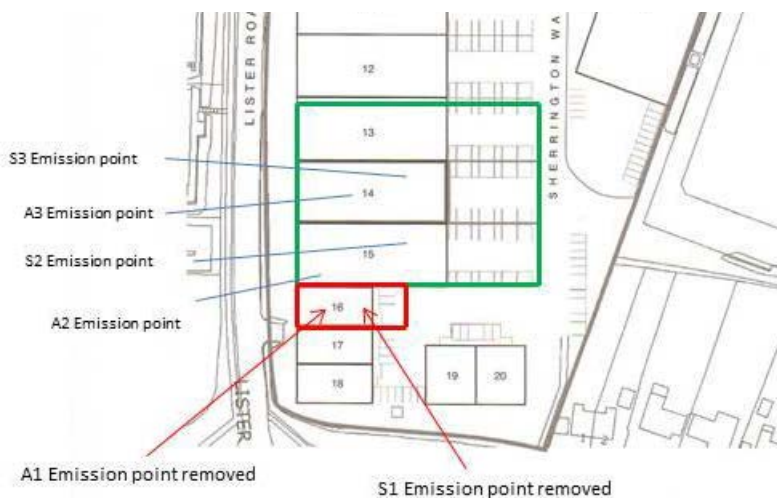
*Stage 3) Dismantle barriers (bunds), and racking.*

*Stage 4) Decontaminate, if required, pits on site (Unit 16 and forecourt sump), and then fill them with concrete or any other material agreed with the Environment Agency.*

*Stage 5) Collect data on the condition of the groundwater at the installation to assist in the permit surrender process. The results will help us to clarify whether contamination, if any, has occurred by comparing with the results obtained by the Site Protection and Monitoring Programme.*

Emission points S1 and A1 identified in the permit have been removed.

A diagram detailing the area removed (red) and the revised installation boundary (green) is shown below;



The building has been occupied since new by Leverton-Clarke Limited and used exclusively for the manufacture of lithium chemicals, raw material storage and product testing. All processes and plant have been free standing and without connection to storm water drains or sewer.

The building is in a good state of repair and has been totally emptied of all equipment, support structures and chemicals. The laboratory has been cleared of all furniture, equipment and chemicals and its structure physically removed. There is no visible evidence of chemical residues or contamination of any kind in the main building or front apron. The roof and walls are free of any penetrations and the floor surface is generally in good condition but subject to some local wear and tear. There are no cracks or damage related penetrations in the floor slab. The small process sump and connected floor channels have been inspected for cracks or any form of damage that could have allowed seepage through. Following inspection these have been filled with concrete. All internal structures have been removed and the building is effectively in the condition in which Leverton-Clarke undertook their lease allowing for normal wear and tear over the past 25 years.

The above was confirmed in a site inspection by the local Area Officer on 26/03/15.

### **Potential sources of land or groundwater contamination**

Unit 16 has no floor drains connected to the estate services and the process drains have been confirmed as in watertight condition prior to being thoroughly cleaned and filled in. There have been no significant spillages of product or raw materials in the building. The only known spillage of any significant quantity was of demineralised water in 2011.

There have never been any underground storage tanks or process lines inside this building. The floor surface is original apart from the small process sump and channels which are now filled in.

### **Borehole Water Analysis**

Analysis of the borehole water from October 2006 to February 2015 was provided within appendix 4 of the application. The results indicated that there had been no significant change in the levels found during the lifetime of the permit.

### **Conclusion**

Comparing the Surrender Data with the Reference Data, in general it is considered there has been no deterioration in the quality of the land since issue of the permit.

The Environment Agency therefore agrees with the assessment that there has been no significant increase in levels of contaminants associated with the ground or groundwater underlying the site during the period of permitted activities. From the evidence supplied, the Environment Agency has concluded that the pollution risk has been removed and that the site is in a satisfactory state. The application to surrender the part of the permit relating to Unit 16 is accepted.

## 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
<b>Receipt of submission</b>		
Confidential information	A claim for commercial or industrial confidentiality has not been made.	✓
<b>The facility</b>		
The regulated facility	<p>The permitted regulated facilities have changed as a result of the partial surrender.</p> <p>Unit 16 has been surrendered therefore the Installation boundary has decreased. The revised site plan is shown in the surrender notice.</p>	✓
<b>The permit conditions</b>		
Changes to permit conditions	<p>The permit conditions have changed as a result of the partial surrender.</p> <p>The following conditions have been amended to reflect the removal of Unit 16 and associated land from the permit;</p> <ul style="list-style-type: none"> <li>• 1.1.1 (table 1.1.1)</li> <li>• 2.2.1.2 (Table 2.2.1)</li> <li>• 2.2.2.7 (Table 2.2.7)</li> <li>• 2.2.2.8 (Table 2.2.8)</li> <li>• 5.1.2.1 (Schedule 1 Notice)</li> <li>• Amended site plan</li> </ul>	✓
<b>The site</b>		
Extent of the surrender application	<p>The operator has provided a plan showing the extent of the site of the facility that is to be surrendered.</p> <p>We consider this plan to be satisfactory.</p>	✓
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.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	In coming to this decision we have had regard to the state of the site before the facility was put into operation.	