

Environment Agency permitting decisions

Surrender

We have decided to accept the surrender of the permit for Broomhouse Lane Pipe Factory operated by Polypipe Limited.

The permit number is EPR/VP3133BN.

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

Background

The installation is located at Broomhouse Lane, Edlington, Doncaster, DN12 1ES. The permit for the facility contained one listed activity - a Section 4.2 A (1)(d) activity – “Unless falling within another Section of this Schedule, any manufacturing activity, other than the application of a glaze or vitreous enamel, involving the use of any of the following elements or compound of those elements or the recovery of any compound of the following elements – antimony; arsenic; beryllium; gallium; indium; lead; palladium; platinum; selenium; tellurium; thallium, where the activity may result in the release into the air of any of those elements or compounds or the release into water of any substance listed in paragraph 13 of Part 2 of this Schedule.” The site also had four directly associated activities:

- storage and handling of raw materials
- processing, storage and handling of waste materials

- control and abatement systems for emissions to air
- the operation of systems for the supply of utilities and services.

This site was permitted because of the use of lead. This is not a site closure - it will continue to produce a range of plastic plumbing and plastic building products but will cease using a lead stabiliser and any other lead containing raw materials.

No pollution incidents have occurred during the lifetime of the permit that have significantly impacted land or groundwater.

Decommissioning Plan and Pollution Risk

All decommissioning activities at the site were in line with the approved site closure plan.

From 2009 onwards the site began to substitute the lead stabiliser for a calcium zinc stabiliser and by December 2013 it had stopped using lead stabiliser completely.

The Operator has submitted a site closure plan which demonstrates that all site kit and equipment associated with the activities undertaken at the site have been decommissioned to an acceptable standard. Decommissioning included the following actions:

- All silos and associated pipework have been flushed
- Analytical testing was carried out on samples of the PVC compound and no trace of lead was detected
- All lead containing waste material and related storage containers were removed by licensed contractors

We have assessed the Operator's final site condition report to determine that no pollution has occurred to ground. At the time of permit application it was deemed necessary to conduct environmental monitoring at the edge of the site where surface water could drain off, and also to undertake dust monitoring at several areas around the boundary. However, the Agency concluded there was no need to continue as there was no actual or potential contamination migration.

We have assessed the final site condition report and consider the state of the ground to be sufficient to allow the permit to be surrendered without any remediation works, i.e. we have not found evidence of contamination due to the activities carried out on site.

We are satisfied that the decommissioning plan has been followed and the site has been decommissioned to an acceptable standard with no evidence of pollution or potential pollution pathways. Therefore, the surrender of the permit will not lead to pollution of the environment.

Acceptable State

We deem the site to be in an acceptable state to surrender the permit in accordance with the application made by the Operator. We have visited the site a number of times over the operation of the permit and confirm that the site has been operated in accordance with all permit conditions and in a way so as to avoid pollution of the environment. Our inspections indicated that all site equipment had been maintained throughout the operation of the permit and all structures had been kept in good operational order. Our final site inspection on the 10th of October 2014 confirmed that lead is no longer used at the facility. Therefore the permit can be successfully surrendered.

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 site		
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	<p>We are satisfied that the necessary measures have been taken to avoid a pollution risk resulting from the operation of the regulated facility.</p>	✓
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>	✓