

Permitting decisions

Part surrender

We have decided to accept the surrender of part of the permit for Morecambe Solvent Management operated by Tradebe Solvent Recycling Limited.

The permit number is [EPR/BL7302ID/S006](#).

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 provides a record of the decision making process. It summarises the decision making process in the decision checklist to show how all relevant factors have been taken into account. This decision document provides a record of the decision making process. It:

- highlights [key issues](#) in the determination
- summarises the decision making process in the [decision checklist](#) to show how all relevant factors have been taken into account.

Unless the decision document specifies otherwise we have accepted the applicant's proposals. Read the permitting decisions in conjunction with the environmental permit and the surrender notice. The introductory note summarises what the notice covers.

Key issues of the decision

The applicant has applied to surrender a scheduled activity from their current permit which will remove the sites ability to burn both solvent and aqueous wastes through Combustion Unit 1 (CU1). The unit was used for liquid wastes only as a means of dealing with materials which could not be sold on as secondary liquid fuels. Other sites owned by the same company have suitable incinerators so any future wastes generated that cannot be sold onwards can be disposed of via these other facilities so that there is no waste stockpiling. The site will continue to treat and process waste though the remaining permitted activities. The partial surrender comprises:

- removal of the scheduled activity Section 1.1 A(1)(b)(iii): burning any fuel manufactured from, or comprising any other waste in an appliance with rated thermal input of 3MW or more but less than 50MW (CU1). This will become a 'standby boiler' to CU2 with no capacity to incinerate waste
- retaining the directly associated activity 'Combustion of fuel in a boiler with rated thermal input of 3.8MW for the production of steam for use in distillation processes' as the main combustion unit (CU2).

1) Low Risk Surrender

The Environment Agency may consider a low risk surrender application for the partial surrender of a permit even where the overall site would not be considered low risk – this is the case for this installation. For this to apply, the part being surrendered (scheduled activity only, not the land associated with it) should not be essential for and will not influence or be influenced by the rest of the site. Also, the evidence burden to demonstrate that the site is in a satisfactory condition is small or non-existent.

We confirm that an intrusive investigation is not needed in line with the Site Condition Report Guidance and Templates. However, as a scheduled activity is being surrendered with the associated land remaining within the permitted boundary and potentially being affected by ongoing site operations, the Applicant will be expected to fully assess this land at the time when the permit is surrendered in full.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have not identified any information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on confidentiality.
The facility	
The regulated facility	The permitted regulated facilities have changed as a result of the partial surrender. Refer to the key issues section of this document for more details.
The site	
Extent of the surrender application	The operator has provided a plan showing the extent of the scheduled activity at the facility that is to be surrendered (no land is being 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. Refer to the key issues section of this document for more details.
Permit conditions	
Changes to permit conditions as a consequence of the surrender	The permit conditions have changed as a result of the partial surrender with regards to the scheduled activity listed in Table S1.1.1 within permit EPR/BL7302ID/S006. Refer to the key issues section of this document as well as EPR/BL7302ID/S006 for more details.