Permitting decisions

Surrender

We have decided to accept the surrender of the permit for Eastfield Facility operated by Sulzer Electro Mechanical Services (UK) Limited.

The permit number is EPR/LP3336ZN.

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 in to 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

Reason for surrender application

The installation was permitted for two activities;

1) Surface metal treatment activity installation.

2) Non-Ferrous Metals and the production of Carbon and Graphite.

The installation was involved in the melting of metals with cadmium content above the 0.05% threshold.

The installation was for the repair, re-manufacture and reclamation of mechanical equipment. Overall, the installation had six emissions to atmosphere and two discharges of uncontaminated roof water to surface water. There was no discharge to sewer.

The main surface metal activities included mechanical and chemical preparation, solvent vapour degreasing, nickel and chromium electroplating and metal spraying. Other facilities for machining and finishing existed on site outside the scope of the installation. Designated buildings were assigned to individual activities.

'White metal' re-lining of bearings took place at the installation, which consisted of removing old white metal linings by melting out and casting new lining in to the bearings shell. 'White metal' bearings were used as a running surface against various metals and coatings in mechanical engineering equipment.

The use of trike for solvent vapour degreasing was a directly associated activity.

The surface metal treatment emission A1 (in the permit – see Table S3.1) had a mist eliminator in place to minimise chromium emissions. The white metal process has three local exhaust ventilation emissions discharging to atmosphere (A2 to A4 in the permit – see Table S3.1).

There was another separate department that housed the three metal spray processes. Electric Arc spraying, Plasma spraying and High Velocity Oxygen Fuel Spraying. All three processes involved generating a heat source into which the coating consumables were fed either in the form of a wire or powder, the heat generated melted the wire or powder, this was then projected at the component at high velocities by compressed air or by the release of pressure within the guns ignition chamber resulting in a high velocity jet stream. All metal spraying took place within a dedicated building which had LEV systems that drew the fume and dust from the work areas in to dust extractors, these were reverse jet cleaning filtration units which contained corrugated filter cartridges which were cleaned by a fully automated timed reverse pulse blown down with compressed air which cleaned down the filters, all the collected dust then dropped into a discharge hopper and the spent air was exhausted to atmosphere (A5 and A6 in the permit – see Table S3.1).

The effluent from all the scheduled activities was fed to an onsite effluent treatment plant. The effluent treatment included chrome reduction, neutralisation and flocculation followed by settlement. The operator optimised the recycling of the treated water from the final outlet of the treatment plant and had chosen not to discharge to sewer. Any effluent unable to be treated and recovered was sent off site for disposal.

The site is no longer in operation. Manufacturing operations ceased mid-2016. The operator followed their own Site Closure Plan (see Annex C to operator's SCR "*Sulzer Site Closure Plan").*

The operator retained decommissioning plans, site clean-up requirements, waste transfer notes, method statements and photographs documenting the various activities that were carried out during decommission. The operator states that the decommissioning and decontamination is complete and pollution risks from permitted activities have been removed. The process was completed at the end of November 2016.

The decommissioning team included personnel from Sulzer's with experience of both the plant and equipment processes. The operator adopted a specific process for decommissioning the various plant areas (see Annex B to the operator's SCR).

The main decommissioning/decontamination areas were:

- Stand by Power Room
- Compressor Room
- White Metaling
- Grinding Shop
- Welding Shop
- Chemical Store
- Machine Shop
- Metal Spray Shop
- Plating Shop
- Plating Shop External

Decommissioning involved taking the production plant out of active service and ensuring all process chemicals or other hazardous materials were safely removed and appropriately disposed of. All equipment was removed from site (see Annex B to operator's SCR for full details).

Unwanted items and general wastes were removed from all areas of the site. This included; paperwork and miscellaneous officer furniture, miscellaneous plant, equipment and apparatus specified as no longer required, glass ware, personal protective equipment, items on walls with no future use, whiteboards, empty barrels and tools.

Site staff and sub-contractors cleaned all the production buildings of all raw materials, products and wastes with potential to cause pollution. Any waste materials remaining were stored in the waste compound prior to collection by a licensed waste contractor. This has been documented in Annex D to the operator's SCR.

Excess raw materials were sold to another potential user, or designated as waste and disposed of appropriately (see Annex D and E to operator's SCR).

Waste relating to the production activities were disposed of in accordance with existing practices and via existing licensed third parties. Further waste was generated through the decommissioning process, specifically from washing and slushing of equipment. Aqueous based waste with a low level of contamination (i.e. waster rinses including cleaning agents, scrubber liquors and general was-down water) were removed by the contractors responsible for the clean-up.

The operator states that there are no materials of machinery with the potential to cause pollution present on the site. The operator has provided photos of the site as it stands (see Annex G to the operator's SCR).

The site was vacated at the end of 2016.

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 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 site	
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.
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit surrender. Paragraph 1.3 of the guidance says: "The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation." We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.