

Permitting decisions

Surrender

We have decided to accept the surrender of the permit for Harlow Boilers and Generators operated by GlaxoSmithKline Research and Development Limited.

The permit number is EPR/FP3633LA.

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

The applicant, GlaxoSmithKline Research and Development Limited, has provided an application for full surrender with supporting evidence that comprises:

- Document entitled 'Surrender Site Condition Report', project number UK11-23754, dated 19 July 2017 and prepared by Ramboll Environ.
- Appendix 1 – Figures.
- Appendix 2 – Photographic logs.
- Appendix 3 – Permit and variation.
- Appendix 4 – CAR and pre-surrender meeting.
- Appendix 5 – Pre-permit site investigation.
- Appendix 6 – Chemical storage and tank details.
- Appendix 7 – Protection and Monitoring Plan and Application Site Report.
- Appendix 8 – Annual reporting.
- Appendix 9 – Checklists and procedures.

- Appendix 10 – Decommissioned plant labelling.
- Appendix 11 – Improvement programme documents.
- Appendix 12 – Discharge Consent termination.
- Appendix 13 – Example PPM Jobsheets and Checklists.
- Appendix 14 – Accident Management Plan.

The permit is being surrendered due to the site falling under the regulatory threshold of >50 MWth as a result of decommissioning a number of boilers and generators. On this basis some of the boiler and generator installations will continue to operate outside of the scope of the Environmental Permitting Regulations presently, although the remaining plant will be coming under the Medium Combustion Plant (MCP) Directive for existing plant in 2025. The operator has been made aware of this. A summary of the current status of the boilers and generators covered by the permit is shown in Table 1 on pages 4 and 5 of this document.

Prior to decommissioning all GSK equipment and plant (including flues, tanks and fuel lines) were decontaminated and cleaned in line with the relevant GSK Environment, Health and Safety (EHS) Procedures. Associated plant rooms were also cleaned. All applicable equipment and associated plant were decontaminated and cleaned in line with relevant GSK procedures and best practice guidance. All decommissioned plant has been clearly labelled stating that the equipment is not to be recommissioned or restarted before seeking permission from the GSK EHS Team (as shown in Appendix 10 of the Surrender SCR). The decommissioned boilers and generators have been isolated from power supplies and, as such, cannot be easily restarted in the event of failure of the remaining operational installations.

Following our review of the surrender application and supporting information we, the Environment Agency, are satisfied that the operator, has provided sufficient evidence to demonstrate that the permitted Harlow Boilers and Generators installation has been returned to a satisfactory state.

Further details are provided within the Site Condition Report Evaluation Template and it should be read in conjunction with this decision document.

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. |

Table 1: Current status of the boilers and generators at the site.

| Area of Facility | Building Reference | Boiler/Generator Reference | Thermal Input (MWth) | Current Status |
|-------------------|--------------------------------|----------------------------|----------------------|---------------------------------------|
| Boilers | | | | |
| North | H4 – Old Boiler House | Boiler 1 | 6.6 | Decommissioned and demolished in 2009 |
| | | Boiler 2 | 3.3 | |
| | | Boiler 3 | 6.6 | |
| | H39 – Energy Management Centre | Boiler 2 | 10 | Decommissioned in August 2012 |
| | | Boiler 3 | 10 | Decommissioned in March 2013 |
| | | Boiler 4 | 6.6 | Operational |
| South | H87 – South Side Boiler House | Boiler 1 | 6.6 | Operational |
| | | Boiler 2 | 6.6 | |
| | H87 – HTHW Boiler House | Boiler 1 | 3.75 | Decommissioned January 2011 |
| | | Boiler 2 | 3.75 | |
| | | Boiler 3 | 3.75 | |
| | H92 | Boiler 1 | 0.73 | Operational |
| Boiler 2 | | 0.73 | | |
| Generators | | | | |
| North | H39 | Emergency Generator 1 | 3.5 | Operational |
| | | Emergency Generator 2 | 3.5 | |
| | | Emergency Generator 3 | 3.7 | |
| | H15 | Emergency Generator | 1.2 | Decommissioned in 2010 |
| | H17 | Emergency Generator 1 | 1.8 | Operational |
| | H17 | Emergency Generator 2 | 1.8 | Operational |

| | | | | |
|---|--------------------------|-----------------------|-----|---------------------------------------|
| | H35 | Emergency Generator | 1.7 | Operational |
| | H45 (Fourth Avenue Site) | Emergency Generator | 1.1 | Decommissioned and demolished in 2015 |
| South | H84 | Emergency Generator | 2.3 | Decommissioned and demolished in 2010 |
| | H87 | Emergency Generator 1 | 1.7 | Decommissioned in 2017 |
| | | Emergency Generator 2 | 1.7 | Operational |
| | | Emergency Generator 3 | 1.7 | |
| | | Emergency Generator 4 | 1.7 | Decommissioned in 2017 |
| | H89 | Emergency Generator | 1.8 | Operational |
| | H92 | Emergency Generator | 1 | Operational |
| Remaining total thermal input of operational boilers and generators = 43.46 MWth | | | | |