

# Surrender notice with introductory note

## The Environmental Permitting (England & Wales) Regulations 2010

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Tradebe Solvent Recycling Limited  
Morecambe Solvent Management  
Middleton Road  
Morecambe  
Lancashire  
LA3 3JW

### **Surrender application number**

EPR/BL7302ID/S006

### **Permit number**

EPR/BL7302ID

# Morecambe Solvent Management

## Permit number EPR/BL7302ID

### Introductory note

#### **This introductory note does not form a part of the notice.**

The following notice gives notice of the surrender in part of an environmental permit.

The applicant has applied to surrender a scheduled activity from their current permit which will remove the sites ability to incinerate both solvent and aqueous wastes through Combustion Unit 1 (CU1). CU1 has ceased to operate as an incineration plant and thus no longer burns hazardous solvent wastes. The unit was used for incinerating liquid wastes only as a means of dealing with materials which could not be sold on as secondary liquid fuels. The potential for airborne pollution from the incineration of wastes has been removed and all equipment and pipelines associated with the burning of waste materials through the unit have been physically disconnected.

CU1 will still be able to burn 'non-waste' fuels and will serve as the 3.8MW back-up/standby boiler to generate steam for distillation processes when CU2 (also a 3.8MW 'non-waste' boiler used to generate steam) is shut down for maintenance or inspection purposes. The existing tank storage capability will continue to be used to hold product grade distillate fuel (instead of liquid wastes) and the site will continue to carry out the other activities that are detailed within the permit and not specified as being part of this surrender application.

Other sites owned by the same company have suitable incinerators so any future wastes generated that cannot be sold onwards can be disposed of correctly and under authorisation via these other facilities so that there is no waste stockpiling issues for this site. 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)
- 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).

However, as a scheduled activity is being surrendered with the associated land remaining within the installation permitted boundary and potentially being affected by ongoing site operations, the Applicant will be expected to fully assess this land, and remediate where applicable, at the time when the permit is surrendered in full.

Any changes made as a result of the part surrender are set out in the schedules.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application EPR/BL7302ID/A001		Received 31/03/2005.
Additional information (Schedule 4 response)	09/08/2005	Received 14/10/2005.
Additional information (Acceptable Waste Categories)		Received 25/11/2005.
Additional information (Specification of all fuels and wastes)		Received 14/12/2005.
Permit determined EPR/BL7302ID	21/12/2005	Original permit issued to Solvent Resource Management Limited.

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Variation application EPR/BL7302ID/V002	27/05/2008	
Additional information (Schedule 5 response)	19/08/2008	Received 05/09/2008.
Variation determined EPR/BL7302ID	17/09/2008	
Variation application EPR/BL7302ID/V003	19/12/2011	Name changed to Tradebe Solvent Recycling Limited and change of registered office address.
Variation determined EPR/BL7302ID	16/02/2012	Varied permit issued to Tradebe Solvent Recycling Limited.
Variation application EPR/BL7302ID/V004	06/05/2014	Agency variation to implement changes introduced by IED.
Variation application EPR/BL7302ID/V005	06/02/2015	Registered office changed to: Atlas House, Third Avenue, Globe Park, Marlow, Buckinghamshire, SL7 1EY.
Variation determined EPR/BL7302ID	16/02/2015	Varied permit issued to Tradebe Solvent Recycling Limited.
Part surrender application EPR/BL7302ID/S006	Duly made 08/03/2017	Partial surrender to remove a scheduled activity (no associated land) and amend the list of directly associated activities.
Part surrender determined EPR/BL7302ID (billing ref: HP3839YB)	11/04/2017	Part surrender complete. Varied permit issued to Tradebe Solvent Recycling Limited.

End of introductory note

# Notice of surrender

## The Environmental Permitting (England and Wales) Regulations 2010

The Environment Agency in exercise of its powers under regulation 25 of the Environmental Permitting (England and Wales) Regulations 2010 accepts the surrender in part of

### Permit number

**EPR/BL7302ID**

### Issued to

**Tradebe Solvent Recycling Limited** (“the operator”)

whose registered office is

**Atlas House  
Third Avenue  
Globe Park  
Marlow  
Buckinghamshire  
SL7 1EY**

company registration number 03890526

to operate a regulated facility at

**Morecambe Solvent Management  
Middleton Road  
Morecambe  
Lancashire  
LA3 3JW**

to the extent set out in the schedules.

This notice shall take effect from 11/04/2017.

Name	Date
J Linton	11/04/2017

Authorised on behalf of the Environment Agency

## **Schedule 1 – conditions to be deleted**

The following conditions and tables are deleted as a result of the application made by the operator.

Removal of condition 2.1.3 in relation to the specification permitted waste types for the incineration of wastes on site.

Removal of Table 2.1.2 permitting the incineration of the wastes types described as 'Recovered solvent fuel WT1' and 'Aqueous effluent WT2' in association with condition 2.1.3.

Removal of conditions 2.1.6, 2.1.7, 2.1.10 and 2.1.11 with reference to the incineration of wastes on the site.

## Schedule 2 – conditions to be amended

The following conditions are amended as detailed, as a result of the application made by the operator.

Table 1.1.1 is amended to remove the scheduled activity Section 1.1 A(1)(b)(iii), amend the description of the first listed directly associated activity (CU2) as this will now become the main site boiler following the removal of the Section 1.1 A(1) scheduled activity and add in CU1 as the standby boiler.

**Table 1.1.1 Permitted activities**

<b>Activity listed in Schedule 1 of the PPC Regulations/Associated Activity</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
Section 5.4 Part A(1)(a) – recovering by distillation of any oil or organic solvent.	Operation of the kettle, reboiler heat exchanger, distillation column and vent condensers, feed and product tanks.	From the receipt of material for processing, through the distillation and separation processes to the transfer of separated materials to storage or disposal.
Section 5.3 Part A(1)(b) – the disposal of waste oils other than by incineration or landfill in a facility with a capacity of more than 10 tonnes per day.	Operation of recovery plant for waste oil, including the formulation of Secondary Liquid Fuel by blending process residues with waste materials and a recovery plant for waste oil filters.	From receipt of raw materials, through sorting, size reduction, separation of components, storage of separated components for recycling to blending and despatch of product.
Section 5.3 Part A(1)(a) – the disposal of hazardous waste (other than by incineration or landfill) in a facility with a capacity of more than 10 tonnes per day.	Operation of a waste transfer station for the storage of hazardous waste prior to removal off site for disposal.	Maximum storage of 1,000 drums in the transfer station at any one time prior to removal off site for disposal.
Directly Associated Activity	CU2: combustion of fuel in a boiler with a rated thermal input of 3.8MW for the production of steam for use in distillation processes.	From the receipt and storage of fuel, through to the burning of fuel for the production of steam at the site.
Directly Associated Activity	CU1: combustion of fuel in a boiler with a rated thermal input of 3.8MW for the production of steam for use in distillation processes. This boiler is a standby for the main site boiler.	From the receipt and storage of fuel, through to the burning of fuel for the production of steam at the site.
Directly Associated Activity	Handling and storage of recovered (product) solvents.	From transfer from the distillation unit to tank farm through subsequent blending to loading of bulk road tankers, IBCs or drums from tank farm or distillation unit.
Directly Associated Activity	Handling and storage of wastes for disposal.	From the production of waste materials through to storage of wastes including contaminated materials.
Directly Associated Activity	Air emissions abatement.	Abatement equipment for Drum Handling Plant (DHP1) – water scrubber. Abatement equipment for Drum Handling Plant 2 (DHP2) – carbon bed adsorption column.

1.2.1 The activities authorised under condition 1.1.1 shall not extend beyond the Site, being the land shown edged in yellow on the Site Plan at Schedule 4 to this Permit. The area shown in green on the plan submitted for EPR/BL7302ID/V002 shall relate to the area to which standard rules apply.

Table 2.2.1 is amended to remove emission points A2, A3a, A3b and A7 as these processes are no longer operational and update emission points A8 and A9.

<b>Table 2.2.1 Emission points to air</b>		
<b>Emission point reference or description</b>	<b>Source</b>	<b>Location of emission point</b>
A1	Condenser vent on distillation plant 1	As identified on site plant in Appendix 2.6 of the Application EPR/BL7302ID/A001
A4	Chiller unit vent on LUWA evaporator	As identified on site plant in Appendix 2.6 of the Application EPR/BL7302ID/A001
A5	Drum handling plant 1 (DHP1) liquid scrubber exhaust	As identified on site plant in Appendix 2.6 of the Application EPR/BL7302ID/A001
A6	Drum handling plant 2 (DHP) carbon scrubber exhaust	As identified on site plant in Appendix 2.6 of the Application EPR/BL7302ID/A001
A8	Combustion unit 1 (CU1) (standby boiler)	As identified on site plant in Appendix 2.6 of the Application EPR/BL7302ID/A001 and referred to in EPR/BL7302ID/S006
A9	Combustion unit 2 (CU2) (main boiler)	As identified on site plant in Appendix 2.6 of the Application EPR/BL7302ID/A001 and referred to in EPR/BL7302ID/S006
A10 to A12	Cooling water tower	As identified on site plant in Appendix 2.6 of the Application EPR/BL7302ID/A001

Table 2.2.2 is amended to remove incineration of waste related monitoring parameters for emission points A2, A3a, A3b, A7 and the removal of scheduled activity Section 1.1 A(1)(b)(iii).

<b>Table 2.2.2 Emission limits to air and monitoring</b>					
<b>Emission point reference</b>	<b>Parameter</b>	<b>Limit (incl. ref. period)<sup>1</sup></b>	<b>Monitoring frequency</b>	<b>Monitoring method</b>	
A1, A4 aggregated	Volatile Organic Compounds Total Class A (as substances)	1,000kg/year	Annual <sup>10</sup>	---	
A1, A4 aggregated	Volatile Organic Compounds Total Class B (as carbon)	5,000kg/year	Annual <sup>10</sup>	---	
A5	Volatile Organic Compounds Total Class A (as substances)	10,000kg/year	Annual <sup>10</sup>	---	
A5	Volatile Organic Compounds Total Class B (as carbon)	100,000kg/year	Annual <sup>10</sup>	---	
A6	Volatile Organic Compounds Total Class A (as substances)	20mg/m <sup>3</sup> periodic over a minimum of 1 hour period	Annual	BS EN 13649	
A6	Volatile Organic Compounds Total Class B (as carbon)	75mg/m <sup>3</sup> periodic over a minimum of 1 hour period	Annual	BS EN 13649	

Note 1: see section 6 of permit for reference conditions.

Note 10: demonstration of compliance through mass balance or other suitable surrogate method agreed in writing with the Environment Agency.

Table 2.2.11 is amended to update the operating measures at the site with regards to the removal of the ability to incinerate liquid wastes at the site.

**Table 2.2.11 Equivalent parameters and technical measures**

Parameter or measure	Requirement or description of measure and frequency (if relevant)
Fuel specification	Waste shall not be burned in Combustion Unit 1 (CU1) and Combustion Unit 2 (CU2).
Control of discharge through W1	Continuous monitoring of Total Organic Carbon and pH of discharge collection tank shall be maintained together with an alarm system to warn of unusual values.

Table 2.10.1 is amended to update the monitoring requirements at the site with regards to the removal of scheduled activity Section 1.1 A(1)(b)(iii).

**Table 2.10.1 Other monitoring requirements**

Emission point reference or source or description of point of measurement	Substance or parameter	Monitoring frequency	Monitoring method	Other specifications
W1	Short chain chlorinated paraffins	Monthly	---	Flow proportionate composite of daily samples
Near inner wall of furnace on CU1	Temperature (°C)	---	Traceable to National Standards	---

The following is amended in '6 Interpretation' to reflect the changes to the boiler operations on site after the removal of scheduled activity Section 1.1 A(1)(b)(iii).

*“Abnormal operation”* means any technically unavoidable stoppages, disturbances or failures of the abatement plant or the measurement devices during which the concentrations in the discharges into the air and the purified waste water of the regulated substances may exceed the normal emission limit values. It includes the time taken for the plant to stabilise after the repair or replacement has been carried out.

Table S2 is amended to remove the reporting and monitoring requirements for the incineration of waste related to emission points A2, A3a, A3b, A7 and the removal of scheduled activity Section 1.1 A(1)(b)(iii).

**Table S2 Reporting of monitoring data**

Parameter	Emission point	Reporting period	Period begins
Volatile Organic Compounds Total Class A (as substances)	A1, A4 aggregated	Annually	01/04/2017
Volatile Organic Compounds Total Class B (as carbon)	A1, A4 aggregated	Annually	01/04/2017
Volatile Organic Compounds Total Class A (as substances)	A5	Annually	01/01/2006
Volatile Organic Compounds Total Class B (as carbon)	A5	Annually	01/01/2006
Volatile Organic Compounds Total Class A (as substances)	A6	Annually	01/01/2006
Volatile Organic Compounds Total Class B (as carbon)	A6	Annually	01/01/2006
Volatile Organic Compounds (kg)	Permitted Installation	Annually	01/01/2006
Flow rate (Ml/day) <sup>2</sup>	W1	Every 6 months	01/01/2006
pH range <sup>3</sup>	W1	Every 6 months	01/01/2006



**Table S2 Reporting of monitoring data**

<b>Parameter</b>	<b>Emission point</b>	<b>Reporting period</b>	<b>Period begins</b>
Chemical oxygen demand (mg/l) <sup>2</sup>	W1	Every 6 months	01/01/2006
Cadmium (ug/l) <sup>2</sup>	W1	Every 6 months	01/01/2006
Chromium (ug/l) <sup>2</sup>	W1	Every 6 months	01/01/2006
Copper (ug/l) <sup>2</sup>	W1	Every 6 months	01/01/2006
Lead (ug/l) <sup>2</sup>	W1	Every 6 months	01/01/2006
Nickel (ug/l) <sup>2</sup>	W1	Every 6 months	01/01/2006
Zinc (ug/l) <sup>2</sup>	W1	Every 6 months	01/01/2006
1,2 dichloroethane (ug/l)	W1	Every 6 months	01/01/2006
Trichloroethylene (ug/l)	W1	Every 6 months	01/01/2006
Chloroform (ug/l)	W1	Every 6 months	01/01/2006
Tetrachloroethylene (ug/l)	W1	Every 6 months	01/01/2006
Trichlorobenzene (ug/l)	W1	Every 6 months	01/01/2006
Carbon tetrachloride (ug/l)	W1	Every 6 months	01/01/2006
Pentachlorophenol (ug/l)	W1	Every 6 months	01/01/2006
Dichlorormethane (ug/l)	W1	Every 6 months	01/01/2006
1,1,1 trichloroethane (ug/l)	W1	Every 6 months	01/01/2006
Short chain chlorinated paraffins (ug/l)	W1	Every 6 months	01/01/2006
Cadmium (kg)	W1	Annually	01/01/2006
Chromium (kg)	W1	Annually	01/01/2006
Copper (kg)	W1	Annually	01/01/2006
Lead (kg)	W1	Annually	01/01/2006
Nickel (kg)	W1	Annually	01/01/2006
Zinc (kg)	W1	Annually	01/01/2006
1,2 dichloroethane (kg)	W1	Annually	01/01/2006
Trichloroethylene (kg)	W1	Annually	01/01/2006
Chloroform (kg)	W1	Annually	01/01/2006
Tetrachloroethylene (kg)	W1	Annually	01/01/2006
Trichlorobenzene (kg)	W1	Annually	01/01/2006
Carbon tetrachloride (kg)	W1	Annually	01/01/2006
Pentachlorophenol (kg)	W1	Annually	01/01/2006
Dichlorormethane (kg)	W1	Annually	01/01/2006
1,1,1 trichloroethane (kg)	W1	Annually	01/01/2006
Water usage	Permitted Installation	Annually	01/01/2006
Energy usage	Permitted Installation	Annually	01/01/2006
Waste disposal and/or recovery	Permitted Installation	Annually	01/01/2006

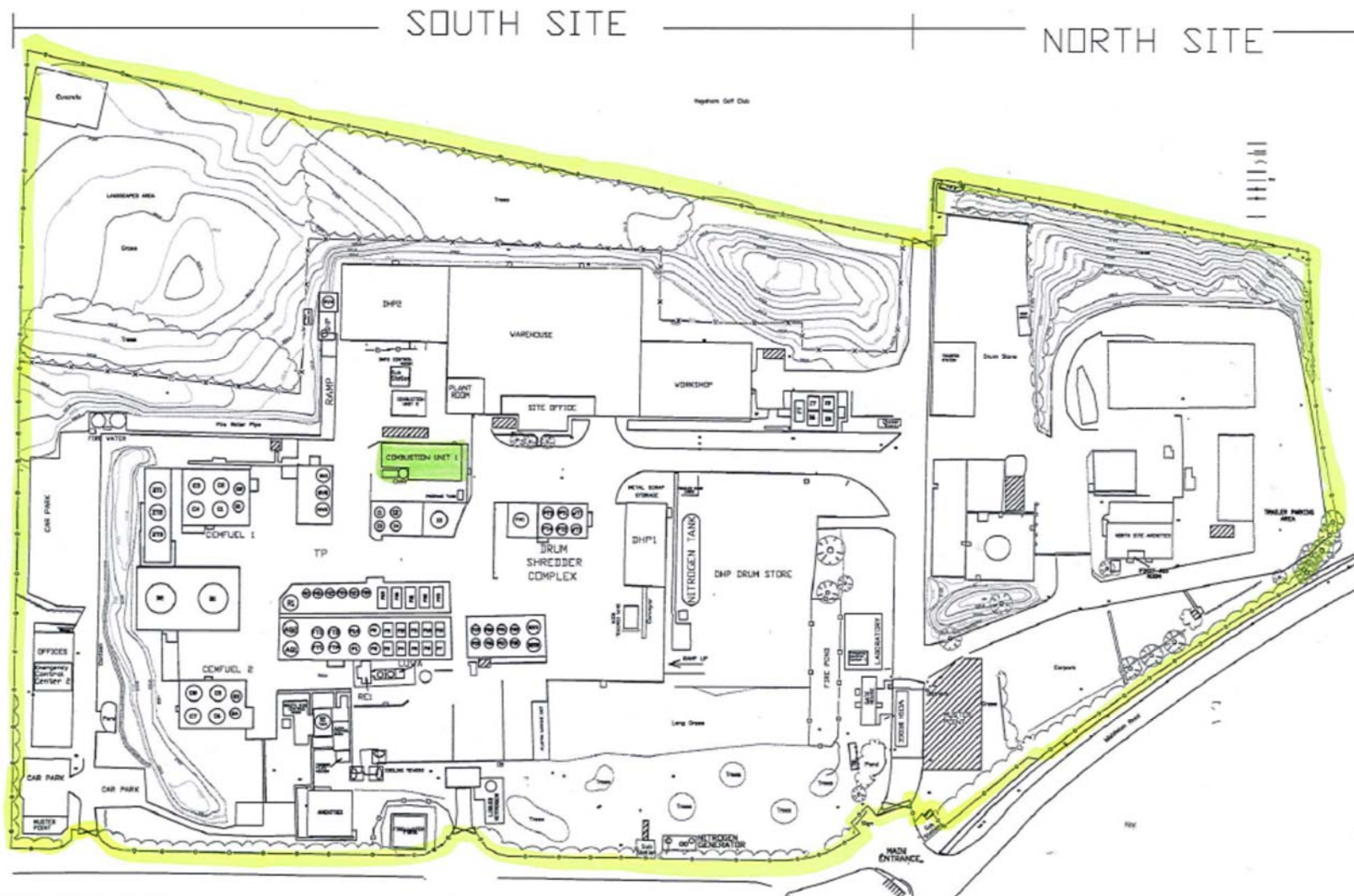
Note 2: the maximum daily value and mean value for each month shall be reported.

Note 3: the maximum and minimum daily value for each month shall be reported.

**Schedule 3 – conditions to be added**

None.

## Schedule 4 – amended plan



Note: the pipeline transferring effluent from the site to the Irish Sea is included in the Installation boundary from the sea outfall pit on site to the point at which it joins the sea outfall pipe for the area.