

## Permitting decisions- Surrender

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We have decided to accept the surrender of the permit for **Wallingford Road Anodising Site** operated by **Union Anodisers Limited**

The permit number is **EPR/QP3734NF**

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 this decision that 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:

- highlights key issues in the determination
- summarises the decision-making process in the decisions considerations section to show how all relevant factors have been taken into account

Read the permitting decisions in conjunction with the environmental permit.

### Key issues of the decision

#### Background

The installation is a surface treatment facility factory operating following scheduled activities:

- Section 2.3 A(1) (a)  
Unless failing within Part A(2) of this section surface treating metals and plastic materials using and electrolytic or chemical process where the aggregated volume of the treatment volumes is more than 30 m<sup>3</sup>
- 5.4 A(1)(a) (ii)  
Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment is anaerobic digestion) involving one or more of the following activities and excluding activities covered by Council directive 91/271/EEC concerning urban wastewater treatment.  
- physico-chemical treatment.

It should be noted that the effluent treatment plant was installed in 2009 as part of response to an improvement plan.

### **Overview of permit history is as follows:**

- Installation permit issued in April 2005. The permit was issued as EPR/AP3233ER and then transferred to current owner in 2013.
- The permit was issued as a surface treatment activity and has continued as such during the life of the permit.
- There have been no technical variation applications under EPR during life of the permit.
- However, in 2009 an effluent treatment plant was introduced after an improvement condition response to reduce emissions to sewer impacts.
- In 2006 there was a special plastic liner installed under the plant floor and bund area to minimise ground water and land contamination.

The August 2023 Site Condition Report (SCR) at surrender summarises as:

*In agreement with the Environment Agency, an impermeable membrane was placed across the site and covered with concrete to create a barrier. This was installed in the first year of the permit.*

### *History of closure of site activities is as follows:*

- Cessation of operations :Surface treatment activities ceased on 26th March 2020.
- Decommissioning of the installation was carried out during 2023. Final process tanks (T19 & T20) removed from process area 02/02/23 – T19 being used for storage of re-cycled wastewater approx. 10,000 liter. T20 clean & empty.
- Decommissioning: In duly making response dated 3/11.23 it was confirmed that whilst most of liquors from process removed, effluent was still present as of Oct'23.
- Monitoring : Fieldwork was undertaken on the 26th and 27th June 2023. Report with this from the operator is dated August'23.
- **Final waste skip /effluent removed as of 20<sup>th</sup> December 2023.**

## **Soil & Groundwater Quality Monitoring**

### **Baseline monitoring**

The baseline report was carried out in 2004/5 and the final surrender monitoring in 2023.

The final fieldwork monitoring was undertaken on the 26th and 27th June 2023 and final report dated August 2023.

### **Comparison/Review**

We have carried out a review of the operator surrender site condition report and 2023 surrender monitoring data.

The condition of the membrane barrier after decommissioning showed signs of breakthrough.

However, the installation land area at the site shows to be broadly in a similar condition to the baseline values in 2005, with some minor increases in metal levels in soil and decreases in sulphates and PAHs which would be the primary concerns at site such as this one. One groundwater sample taken from directly beneath the chemical storage areas show elevated (almost a whole order of magnitude over the guideline value) levels of sulphate, though this groundwater is shown to be perched within Made Ground and is unlikely to pose a risk to natural groundwater. The other groundwater sample taken elsewhere did not exhibit concerning levels of sulphate, suggesting the former is localised.

### **Spill history**

We have reviewed the spill and incident history linked to the installation during the permitted period. The only major spill was one in 2014 as detailed in the operator final Site Condition Report (SCR) report dated August 2023; however, although there was chemical spillage beyond the relevant tank bund system, it is concluded that there was no ground water and land contamination.

### **Groundwater Quality Assessment**

#### **Conclusions**

We have assessed the final surrender Site Condition report.

Photographic evidence was provided by the operator to evidence full clearance of the installation.

Sufficient information has been supplied to show that pollution risk has been removed and that the site is in a satisfactory state – accept the application to surrender the permit.

**Hence, we consider the installation is in a satisfactory state to allow the installation permit to be surrendered.**

## **Decision considerations**

### **Confidential information**

A claim for commercial or industrial confidentiality has not been made.

The decision was taken in accordance with our guidance on confidentiality.

### **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.

### **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, having regard to the state of the site before the facility was put into operation.

### **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 accept this permit surrender.