

# Environment Agency permitting decisions

## Surrender

We have decided to accept the surrender of the permit for Ravensthorpe Mills operated by Ulster Yarns Limited.

The permit number is EPR/BR5051IL.

The surrender number is EPR/BR5051IL/S005.

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.

## Summary of the decision

We have decided to accept the surrender of the permit.

A non-technical description of the installation is included in the introductory note to the permit, however key points considered relevant to the decision to accept the surrender of the permit are outlined below.

A permit was issued under the Pollution Prevention and Control (PPC) Regulations to Riverstone Spinning Limited (which later changed its name to Ulster Yarn Limited) on 02/04/2003 to carry out the following activities, listed under Schedule 1 to the PPC Regulations (now the Environmental Permitting Regulations (EPR)):

- Section 6.4 Part A(1)(b): Pre-treating (mercerization) or dyeing fibres or textiles in plant with a treatment capacity of more than 10 tonnes per day.

The permit also authorised the operation of the following directly associated activities (DAAs):

- Raw materials, fuel and waste storage and handling;
- Operation of an effluent treatment process for treating trade effluent generated on the installation prior to discharge to sewer; and
- Generation of steam from two 10 MWth boilers.

The main features of the installation when operational were as follows (reproduced from the non technical description in the permit and Surrender site report (SSR)):-

- The receipt and storage of baled fibre
- The receipt and storage of chemicals and fuel

- Blending of fibre
- Loose stock dyeing of fibre followed by drying
- Carding, spinning, twisting and reeling of dyed and un-coloured fibre unto hank.
- Yarn scouring, setting and drying
- Dispatch of finished products
- Treatment of effluent
- Steam generation for the production process.

There were no discharges to surface or controlled waters from the installation. The Operator has applied to surrender the Permit owing to a discontinuance of wet processing activities. The permitted activities carried out by Ulster Yarn Limited ceased on 30 September 2013.

The application was determined as a low risk surrender.

## **Purpose of this document**

This decision document:

- explains how the operator's application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account.

## **Structure of this document**

- Key Issues
- Annex 1 the decision checklist.

## **Key Issues**

The test for the surrender of permits is given in paragraph 14 of Schedule 5 to the EPR 2010, where it states that:

*The regulator must accept an application to surrender an environmental permit in whole or in part under regulation 25(2) if it is satisfied that the necessary measures have been taken –*

*(a) to avoid a pollution risk resulting from the operation of the regulated facility; and*

*(b) 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.*

The factors that we have taken into account in determining whether to accept the application for surrender of the permit are described below.

### **Pollution Risk**

The installation was zoned into two functional areas;

- Areas used to carry out dyeing operations or the handling of process effluent, the generation of steam and the storage of chemicals and dyes (wet processing area).
- Areas used to carry out dry operations such as administration, fibre storage and the textile fibre drying operations (dry processing area).

This division is made on the basis that all the scouring and dyeing techniques used on the site are water-based. Water-soluble or water-dispersible process chemicals present in this activity would thus be expected to have had the greatest potential to contaminate the site by transfer from the process machinery, site drainage system or storage areas as the result of accidental spillage or leaks. The storage of liquid boiler fuels is included in this category. The wet processing area is overlaid by an impermeable surface with bunding installed. Raw materials and potentially polluting substances were all stored in appropriate areas, above ground storage tanks were labelled, hardstanding and bunding were routinely checked.

Conversely, the risk of site contamination occurring from activities that did not involve the use of water or process chemicals is considered to be negligible.

A number of areas relating to pollution prevention were identified as requiring improvement and as such 10 Improvement programme requirements (IPs) were included in the permit. We concluded that based on the proposed operating techniques and site infrastructure, subject to the completion of the IPs, that there would be little likelihood of pollution associated with the activities.

### **Decommissioning and Removal of Pollution Risk**

The Operator has confirmed in their site surrender report (SSR) that;

- all permitted activities have ceased;
- the pollution risk has been removed; and
- the condition of the land has not deteriorated during the lifetime of the permit.

The operator's surrender SCR shows that there has been no change in the condition of the land and that pollution prevention measures have worked during the life of the permit.

We are satisfied that the 'test' for the surrender of permits under paragraph 14 of Schedule 5 to the EP Regulations has been met. Based on our analysis and consideration of the application to surrender the permit, we have concluded that:

- the necessary measures to avoid a pollution risk during the operation of the regulated facility were undertaken, which has protected the site from deterioration;
- all potential polluting activities associated with site activities have been removed; and
- the site of the regulated facility is in a satisfactory state for surrender.

## Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/ notice.

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>The site</b>		
Extent of the surrender application	The operator has provided a plan showing the extent of the site of the facility that is to be 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.	✓