

Case Study 2007/01 – PPC Permit Surrender

Inveresk PLC, Carrongrove Paperboard Mill, Denny, Stirlingshire.

Inveresk PLC (www.inveresk.co.uk) is a market leading UK paper and board manufacturer. Over the past few years, they have been rationalising their paper making operations in a very difficult and competitive market and this led to the closure of the Carrongrove Paperboard Mill near Denny, Stirlingshire. As part of this, the PPC permit at the Carrongrove Paperboard Mill had to be surrendered to the Scottish Environment Protection Agency (SEPA).

Key issues for client and regulator

Key business issues for Inveresk PLC included:

- Surrender of the Permit without the need first to remove the paper machines.
- The need to surrender the Permit before the site could be redeveloped.
- Costs of applying for the Permit Surrender.
- Time taken for the Permit Surrender to be accepted, which could slow down the redevelopment of the site.

There were technical regulatory issues relating to the Permit which needed to be resolved. Critically, the fact that the original PPC Application Site Report had been desktop based, so there were no baseline figures to show the land condition at permit entry. There was also no detailed, current guidance available from either SEPA or the Environment Agency on the contents of a Surrender Site Report.

Solutions provided to client

TT Environmental Ltd provided an integrated technical and regulatory service from the initial site meeting when the surrender was discussed with the regulators, through to achieving Permit Surrender 8 months after the report was submitted (including a 3 month extension requested by SEPA for internal reasons). We used our in-house PPC Permit Surrender Methodology. We liaised with and negotiated with SEPA on the level of decommissioning work required. We provide management advice and support including working with site personnel and assisting with their day-to-day contact with the SEPA

Benefits from our in-house Permit Surrender methodology

1. **Lower costs** than for a traditional intrusive site investigation. Our approach is based on a desktop study, site walkover, and infrastructure inspection/ testing, reducing consultancy time and costs by between £10,000 - £20,000 on a typical factory site.
2. **Quicker** than an intrusive investigation, as sampling, lab results and interpretation all add to the time to produce a report. If no significant PPC pollution is found, it also speeds up the surrender process by ensuring that the land does not have to be remediated before Permit Surrender, saving months or even years.
3. **Accepted by both SEPA and the EA**, showing that regulators have confidence in our approach.
4. **Precise and accurate.** We remove the overlap between the PPC regulations and Contaminated Land regime; reducing potential costs for land and groundwater clean up. In theory, if the Application Site Report is not sufficiently detailed, a permit holder could be asked to clean up historic pollution (which may not be of their making), to a much higher standard than the Contaminated Land regulations might require.
5. **Cost effective.** It removes the cost of an intrusive contaminated land investigation from the current owner/ occupier, and places it on new occupiers, owners or developers like non-PPC sites.

Added benefits to client and regulator

Inveresk benefited from our negotiations over the level of decommissioning. These helped speed up the Surrender process as the paper machines did not need to be removed under PPC. Inveresk also benefited from our knowledge and experience of working on similar projects and our understanding of the regulations. SEPA benefited from being kept informed of the approach and contents of the report, so there were no surprises and requests for additional information when it was submitted

Inveresk PLC comments:

Gordon Thomson, Inveresk's Finance Director, commented: "The professional and methodical approach of TT Environmental Ltd to this issue was a key factor in the smooth run-down and closure of the site and allowed the Inveresk management team to concentrate on major employment and production issues, safe in the knowledge that all matters with the regulators were being handled correctly."

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