

## Application SCR evaluation template

Name of activity, address and NGR	Huntsman Polyurethanes (UK) Limited PO Box 99 Wilton Redcar Middlesborough TS10 4YA NZ 57165 22477
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Document reference of application SCR	Application ref. BS8656 (EPR/BS8656IX/A001) Part surrender ref. EPR/BS8656IX/S008
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Date and version of application SCR	Application 15/08/03 Part surrender 19/08/16
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1.0 Site details	
Has the applicant provided the following information as required by the application SCR template?	Response (Specify what information is needed from the applicant, if any)
Site plans showing site layout, drainage, surfacing, receptors, sources of emissions/releases and monitoring points	Accepted at permit determination 15/04/04.

2.0 Condition of the land at permit issue	
Has the applicant provided the following information as required by the application SCR template?	Response (Specify what information is needed from the applicant, if any)
a) Environmental setting including geology, hydrogeology and surface waters b) Pollution history including: <ul style="list-style-type: none"> <li>• pollution incidents that may have affected land</li> <li>• historical land-uses and associated contaminants</li> <li>• visual/olfactory evidence of existing contamination</li> <li>• evidence of damage to existing pollution prevention measures</li> </ul> c) Evidence of historic contamination (i.e. historical site investigation, assessment, remediation and verification reports (where available)) d) Has the applicant chosen to collect baseline reference data?	Accepted at permit determination 15/04/04.  Baseline data collected. Report references: Final Report Phase 2 IPPC Baseline Site Assessment Report, February 2003; and Addendum Report Phase 2 Baseline Site Assessment Report, February 2004.

3.0 Permitted activities	
Has the applicant provided the following information as required by the application SCR template?	Response (Specify what information is needed from the applicant, if any)
a) Permitted activities b) Non-permitted activities undertaken at the site	Accepted at permit determination 15/04/04.  Site applied to operate under Scheduled Activity Section 4.1A(1)(a)(iv) – producing organic chemicals containing nitrogen. Following Directly Associated Activities (DAAs) were also included in the permit: Storage and handling of raw materials; storage, handling and despatch of finished products, wastes and other materials; control and abatement systems for emissions to air; cooling water system; and

### 3.0 Permitted activities

<b>Has the applicant provided the following information as required by the application SCR template?</b>	<b>Response (Specify what information is needed from the applicant, if any)</b>
	utilities and services

**3.0(a) Environmental Risk Assessment**

<p>The H1 environmental risk assessment should identify elements that could impact on land and waters, cross-referenced back to documents and plans provided as part of the wider permit application.</p>	<p>Accepted at permit determination 15/04/04.</p> <p>Minimal risk on land and waters as no process activities carried out on the area to be surrendered.</p>
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**3.0(b) Will the pollution prevention measures protect land and groundwater?**

<p>Are the activities likely to result in pollution of land?</p>	<p>No. We are satisfied that the site and operator has demonstrated that the pollution prevention measures protect land and groundwater. We consider reaching this decision, to issue an environmental permit, we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environment protection is provided. This was accepted at permit determination 15/04/04.</p>
<p>For dangerous and/or hazardous substances only, are the pollution prevention measures for the relevant activities to a standard that is likely to prevent pollution of land?</p>	<p>See above.</p> <p>No process activities carried out on the area to be surrendered.</p>

Application SCR decision summary	Tick relevant decision
<p>Sufficient information has been supplied to describe the condition of the site at permit issue</p>	<p>Accepted at permit determination.</p>
<p>Pollution of land and water is unlikely</p>	<p>Accepted at permit determination.</p>
<p>Historical contamination is present- advise operator that collection of background data may be appropriate</p>	<p>Accepted at permit determination.</p>
<p>Date and name of reviewer</p>	<p>Päivi Porali-Perrell 23/09/16</p>

## Operational phase SCR evaluation template

<b>4.0 Changes to the activities</b>	
<b>Have there been any changes to the following during the operation of the site?</b>	<b>Response (Specify what information is needed from the applicant, if any)</b>
a) Activity boundaries b) Permitted activities c) "Dangerous substances" used or produced	There have been no changes to the installation boundary during the lifetime of the permit. There have been no changes to the permitted activities on the area to be surrendered within six variations that have been issued since the permit was granted. No dangerous substances have been produced on the area to be surrendered. Sodium Carbonate powder have been stored temporarily on a bunded area on the land to be surrendered.

<b>5.0 Measures taken to protect land</b>	
Has the applicant provided evidence from records collated during the lifetime of the permit, to show that the pollution prevention measures have worked?	No process activities has been carried out on the area to be surrendered. The applicant has provided records of the condition of the site including the incidents. The site has been inspected periodically since it was first permitted and no evidence of pollution has ever been noted on the area to be surrendered.

## 6.0 Pollution incidents that may have impacted on land and their remediation

Has the applicant provided evidence to show that any pollution incidents which have taken place during the life of the permit and which may have impacted on land or water have been investigated and remediated (where necessary)?

Operator's records indicate that there have been two incidents since the permit issue on the area being surrendered. A plan showing the location of these incidents have been provided.

Sodium carbonate was stored on a temporary basis on the area to be surrendered. Storage was equipped with a bunding but spillage occurred when a damaged 25 kg bag of sodium carbonate was moved from the area by the operator. The spillage was <10 kg and cleaned up immediately.

The other incident occurred when the strong effluent storage vent line released droplets of strong effluent on the joint. The strong effluent storage vent line is located outside the area to be surrendered but approximately 200 ml sprayed onto the area to be surrendered. The droplets sprayed a small area which was immediately cleared up.

We are satisfied that there is no risk of pollution due to these incidents after the permit surrender.

## 7.0 Soil gas and water quality monitoring (where relevant)

Where soil gas and/or water quality monitoring has been undertaken, does this demonstrate that there has been no change in the condition of the land? Has any change that has occurred been investigated and remediated?

As part of the Phase 2 Site Investigation carried out in September 2015 samples from the area to be surrendered were collected and analysed for contaminants. The report found that the levels of contaminants in the area are unlikely to pose a significant risk to current and future users of the area. However, we have not assessed this report as a part of the determination of this surrender application as Phase 2 investigation is to determine suitability of the land for future use. There was no requirement to collect reference data to surrender the area of the land as detailed in the application as we are satisfied that this surrender meets with the requirements of low risk surrender.

## Surrender SCR Evaluation Template

<b>8.0 Decommissioning and removal of pollution risk</b>	
Has the applicant demonstrated that decommissioning works have been undertaken and that all pollution risks associated with the site have been removed? Has any contamination of land that has occurred during these activities been investigated and remediated?	No decommissioning works have been carried out as no plant, equipment or permitted activities were carried out on the area to be surrendered.

<b>9.0 Reference data and remediation (where relevant)</b>	
Has the applicant provided details of any surrender reference data that they have collected and any remediation that they have undertaken?  (Reference data for soils must meet the requirements of policy 307_03 Chemical test data on contaminated soils – quantification requirements). If the surrender reference data shows that the condition of the land has changed as a result of the permitted activities, the applicant will need to undertake remediation to return the condition of the land back to that at permit issue. You should not require remediation of historic contamination or contamination arising from non-permitted activities as part of the permit surrender.	Not applicable.

<b>10.0 Statement of site condition</b>	
Has the applicant provided a statement, backed up with evidence, confirming that the permitted activities have ceased, decommissioning works are complete and that pollution risk has been removed and that the land and waters at the site are in a satisfactory state?	The operator has provided a statement of site condition confirming that the area to be surrendered has had no previous history of industrial manufacturing activity during the lifetime of the permit. The Environment Agency is satisfied with the statement. Regular site visits have been conducted and no concerns have been raised.

<b>Surrender SCR decision summary</b>	<b>Tick relevant decision</b>
Sufficient information has been supplied to show that pollution risk has been removed and that the site is in a satisfactory state – we accept the application to surrender the permit.	Accepted at surrender determination.
Date and name of reviewer	Päivi Porali-Perrell 23/09/16