

## Application SCR evaluation template

Name of activity, address and NGR	<p>Corby Tubeworks. PO Box 101, Weldon Road, Corby, Northants, NN17 5UA.</p> <p>National Grid Reference (NGR) SP 9086 8914.</p> <p>Environmental Permit Reference EPR/BS8788IE.</p>
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Document reference of application SCR	<p>Permit Application - Section B 1.3. Update to Site Condition Report – Section C1.3 (March 2006). Update to Site Condition Report – Section E2, Q4 (October 2014).</p>
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Date and version of application SCR	July 2002.
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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	The Applicant provided a Site Condition Report (SCR) at the time the original application was made. Drawings have been provided by the Applicant and reviewed and accepted by the Environment Agency at the application stage.

### 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)
<p>a) Environmental setting including geology, hydrogeology and surface waters</p> <p>b) Pollution history including:</p> <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> <p>c) Evidence of historic contamination (i.e. historical site investigation, assessment, remediation and verification reports (where available))</p> <p>d) Has the applicant chosen to collect baseline reference data?</p>	The Applicant provided the required information within 'Permit Application - Section B 1.3 Site Condition Report. July 2002'. The Applicant confirmed that site baseline data was provided within the above report. However, as the area of land being partially surrendered (October 2014) in this application was only added to the site boundary area by a later permit variation, the area to be partially surrendered will not have been covered in the original application site condition report.

### 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)
<p>a) Permitted activities</p> <p>b) Non-permitted activities undertaken at the site</p>	<p>a) The Environment Agency determined that the Installation comprised the following activities as listed in Part 1 of Schedule 1 to the PPC Regulations at the time of the determination of the original application:</p> <ul style="list-style-type: none"> <li>➤ S1.1A(1)(a) – combustion, burning fuel in a &gt;50mW appliance.</li> <li>➤ S2.1A(1)(c) – processing ferrous metals by hot rolling mills.</li> <li>➤ S6.4B(a)(ii) – metal coating sprayed in a molten form.</li> <li>➤ S6.4B(a)(iv) – coating involving &gt;5 tonnes VOC/yr.</li> <li>➤ S2.2B(c) – melting zinc in conjunction with a galvanising activity.</li> </ul>

<b>3.0 Permitted activities</b>	
<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>
	<ul style="list-style-type: none"> <li>➤ S6.3B(a)(i) – heating bitumen in connection with any manufacturing activity.</li> <li>➤ S2.3A(1)(a) – surface treating metals.</li> </ul> <p>b) slitting plant, cold form mills and coating not involving the use of solvents. Also site effluent treatment and discharge to Willowbrook Stream and associated settlement pond dredging.</p>

<b>3.0(a) Environmental Risk Assessment</b>	
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.	The Environment Agency reviewed the operator's environmental risk assessment (H1) including the potential for environmental impact from emissions to air and water. The H1 was reviewed at the time of the original permit determination and accepted as satisfactory. An Improvement Programme was set within the original permit to ensure that the identified required improvements were undertaken over specified timescales at the installation.

<b>3.0(b) Will the pollution prevention measures protect land and groundwater?</b>	
Are the activities likely to result in pollution of land?	<p>It was concluded that there was little likelihood of pollution arising from the operation of the installation provided that it was operated and maintained correctly. There are no direct discharges of List I or List II substances to groundwater from the site although there are known to be elevated concentrations of zinc (List II) in the vicinity of the galvanising plant. To ensure the continued effectiveness of pollution prevention measures to protect the land the Operator was required to implement and operate under a Site Protection and Monitoring Programme.</p> <p>The majority of wastes generated by the installation are disposed of in an adjoining landfill site. The landfill site does not fall within the boundary of the installation and is therefore the subject of a separate permit.</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>Yes. The installation is served by a single drainage system which conveys both process effluent and surface/storm drainage to a single discharge point in the Willowbrook stream to the south east of the site. A wide range of techniques are employed to control the quality of point source emissions to water around the installation. Additional treatment is provided by chemical dosing at a confluence manhole before the combined effluent travels through a culvert to the Weldon Settlement Ponds facility for final settlement prior to discharge.</p> <p>There are a large number of point source and fugitive emissions to air from the various processes carried out within the installation – some controlled via abatement equipment, some not. Monitoring is carried out to measure pollutants such as particulates, NOx, CO<sub>2</sub>, chlorides, lead, gas flow, temperature, pressure, oxygen and water vapour contents.</p>

<b>Application SCR decision summary</b>	<b>Tick relevant decision</b>
Sufficient information has been supplied to describe the condition of the site at permit issue; or	Yes.
Pollution of land and water is unlikely	Yes.
Date and name of reviewer:	Liz Ebbs, 03/10/2014

## 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	a) Yes. The installation boundary was increased in a permit variation in March 2006. A Site Condition Report was also provided as part of this variation in Section C1.3. Partial surrender of land within the footprint of the installation boundary – Environmental Permit Partial Surrender Application EPR/BS8788IE/S004 – August 2014 (see Sections 8 to 10 below).  b) Yes. March 2006 - Galvanising activities removed and cold drawn tube manufacturing comprising pickling, cold drawing and associated finishing activities added. November 2009 - Additional paint line and coating activities added (moved from sister plant in the Netherlands) and removal of aluminium spray plant which had ceased. December 2010 and 2011- manufacturing ceased.  c) No.

<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?	Yes. All bunded areas for the storage of oils and other substances are classified as environmentally critical equipment and as such are periodically checked for leaking pipework, bund integrity, spillages etc and the results recorded on the SAP plant maintenance system.

<b>6.0 Pollution incidents that may have impacted on land and their remediation</b>	
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)?	All environmental incidents which occur on the site are recorded on an environmental incident database. Each incident is investigated and the corrective actions taken are recorded.

<b>7.0 Soil gas and water quality monitoring</b>	
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?	No additional soil monitoring has been carried out since the original site condition report in 2002. Weekly monitoring of water quality from the site's discharge into controlled water has been carried out and reported to the Environment Agency in accordance with the Environmental Permit requirements.

## Partial 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?	As part of the Partial Surrender - Environmental Permit Partial Surrender Application EPR/BS8788IE/S004 – August 2014, the area to be surrendered has not been put into operation and so no decommissioning or removal of pollution risk was required.

<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?	N/A.

<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?	<p>The Environment Agency's guidance notes on completing Part E2 – surrender application states that the application is considered to be low risk if operations have not started. The area to be surrendered was added to the installation boundary in March 2006 when the permit was varied to include the cold drawing of tubes and associated activities which were being relocated to Corby. The area was added for use as an overflow storage area for steel hollows which were the feedstock for the process with the main storage area being indoors adjacent to the start of the process.</p> <p>Following the downturn in the economy and the resulting deterioration in orders the cold drawn tubes operations ceased production in December 2009. Since the volume of work through the plant did not achieve the anticipated levels there was no requirement to use the overflow storage area. Therefore, no operations have taken place in the area to be removed from the installation boundary as per this partial surrender application. Appendix 5.5 in the application supporting documents shows a photograph of the area to be surrendered.</p> <p>It is therefore concluded that since operations did not start in the area to be surrendered we consider this application to be a low risk surrender. This has been confirmed by Area.</p> <p>Since the area to be surrendered has not been put into operation the land is in the same condition as when it was included in the installation boundary in March 2006. Therefore, the requirements of the Environment Agency's Regulatory Guidance Note on site surrenders (RGN 9) has been met.</p>

<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 – accept the application to partially surrender the area identified in permit application EPR/BS8788IE/S004.	✓
Date and name of reviewer: Liz Ebbs, 03/10/2014	