

Application SCR evaluation template

Name of activity and address	Leeson Polyurethanes Limited Leeson Polyurethanes, Hermes Close, Tachbrook Park, Warwick, Warwickshire, CV34 6NW
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Document reference of application SCR Date and version of application SCR	<ul style="list-style-type: none"> Document entitled 'Low impact surrender document for Plot 2300', dated 23.06.2016 and prepared by Joel Leeson. Additional information submitted on 07.09.2016 in response to a request for information.
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1.0 Site details

Has the applicant provided the following information as required by the application SCR template?

Site plans showing site layout, drainage, surfacing, receptors, sources of emissions/releases and monitoring points

Provided in support of Environmental Permit application EPR/LP3430GT; accepted and determined on 17/02/2010.

2.0 Condition of the land at permit issue

To be completed by GWCL officers
(Receptor)

Has the applicant provided the following information as required by the application SCR template?

- Environmental setting including geology, hydrogeology and surface waters
- Pollution history including:
 - pollution incidents that may have affected land
 - historical land-uses and associated contaminants
 - visual/olfactory evidence of existing contamination
 - evidence of damage to existing pollution prevention measures
- Evidence of historic contamination (i.e. historical site investigation, assessment, remediation and verification reports (where available)
- Has the applicant chosen to collect baseline reference data?

Provided in support of Environmental Permit application EPR/LP3430GT; accepted and determined on 17/02/2010.

3.0 Permitted activities

(Source)

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)**

- Permitted activities
- Non-permitted activities undertaken at the site

The installation manufactured polyurethane pre-polymers, which was considered to fall within and thus was permitted under, S4.1 A(1)(a)(iv) Producing organic chemicals such as organic compounds containing nitrogen, such as amines, nitrous-, nitro- or azocompounds, nitrates, nitriles, nitrogen heterocyclics, cyanates, isocyanates, di-isocyanates and di-isocyanate prepolymers.

The facility also included the following directly associated activities:

- Recovering by distillation of any cleaning solvent, limited to less than 100 tonnes per day.*
- Storage of incoming raw materials and outgoing products.*

3.0 Permitted activities (Source)	
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><i>During determination it was concluded that the installation was capable of meeting the low impact criteria once the use of dichloromethane was discontinued and replaced with a less harmful solvent of lower volatility as proposed in the application. The permit therefore followed the low impact format but with an improvement condition to ensure the replacement of dichloromethane as the cleaning solvent within 6 months of permit issue (07/02/2010). Confirmation was received from the operator that the use of dichloromethane for vessel cleaning was discontinued in April 2010. The installation was operated within the low impact status throughout the duration of the permit.</i></p>	

3.0(a) Environmental Risk Assessment (Source)
<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><i>Risk assessment provided in support of Environmental Permit application EPR/XLP3430GT; accepted and determined on 17/02/2010.</i></p>

3.0(b) Will the pollution prevention measures protect land and groundwater? (Conceptual model)	
<p>Are the activities likely to result in pollution of land?</p>	
<p><i>The site was regulated as a low impact installation and demonstrated through evidence that it met the criteria required for this application type; accepted and determined on 17/02/2010.</i></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><i>The site was regulated as a low impact installation and demonstrated through evidence that it met the criteria required for this application type; accepted and determined on 17/02/2010.</i></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 of EPR/LP3430GT on 17/02/2010</p>
<p>Pollution of land and water is unlikely</p>	<p>Accepted at permit determination of EPR/LP3430GT on 17/02/2010</p>
<p>Date and name of reviewer: (07/09/2016)</p>	<p><i>Kirsty Hobbs</i></p>

Operational phase SCR evaluation template

Sections 4.0 to 7.0 may be completed annually in line with normal record checks.

4.0 Changes to the activities (Source)	
Have there been any changes to the following during the operation of the site?	Response (Specify what information is needed from the applicant, if any)
a) Activity boundaries b) Permitted activities c) "Dangerous substances" used or produced	
<i>No changes during the operation of the site.</i>	

5.0 Measures taken to protect land To be completed by EM/PPC officers (Pathway)
Has the applicant provided evidence from records collated during the lifetime of the permit, to show that the pollution prevention measures have worked?
<i>The site was regulated as a low impact installation and demonstrated through evidence that it met the criteria required for this application type; accepted and determined on 17/02/2010.</i>

6.0 Pollution incidents that may have impacted on land and their remediation To be completed by EM/PPC officers (Sources)
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)?
<i>The operator has stated in the application documents that there have been no pollution incidents on site that could have caused harm to land or groundwater. The Environment Agency's records also indicate that no incidents have been recorded during the lifetime of the permit (EPR/LP3430GT).</i>

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?
N/A

Surrender SCR Evaluation Template

If you haven't already completed previous sections 4.0 to 7.0, do so now before assessing the surrender.

<p>8.0 Decommissioning and removal of pollution risk To be completed by EM/PPC officers</p>
<p>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?</p>
<p><i>All permitted activities have ceased and all sources of pollution risk removed.</i></p>

<p>9.0 Reference data and remediation (where relevant) To be completed by GWCL officers</p>
<p>Has the applicant provided details of any surrender reference data that they have collected and any remediation that they have undertaken?</p> <p>(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.</p>
<p><i>No baseline data requested during determination, therefore no data is required for the surrender.</i></p>

<p>10.0 Statement of site condition To be completed by EM/PPC officers</p>
<p>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>
<p><i>All permitted activities have ceased and the site has been fully decommissioned. The operator has confirmed that all pollution risks have been removed and the site has been returned in a satisfactory state.</i></p> <p><i>The Regulatory Officer has visited the site and confirmed that it has been fully decommissioned.</i></p> <p><i>Therefore we the Environment Agency have reviewed the application for surrender made by the Operator and accept the statement of site condition and view it as being returned in a satisfactory state.</i></p>

<p>Surrender SCR decision summary To be completed by GWCL officers and returned to NPS</p>	<p>Tick relevant decision</p>
<p>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</p>	<p>✓</p>
<p>Date and name of reviewer – 08/09/2016</p>	<p><i>Kirsty Hobbs</i></p>