

## Application SCR evaluation template

Name of activity, address and NGR	Paramount Plating Limited  Ashford East Plating Works South Stour Avenue Eastmead Estate Ashford Kent TN23 7RS
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Document reference of application SCR	Application Site Report (Reference BX8173IS)
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Date and version of surrender SCR	EPR/BX8173IS/S002, 15 April 2015
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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

*Adequate plans were provided by the applicant within pages 25 and 26 of the application site report, which were reviewed and accepted by the Environment Agency as part of the original determination, dated 21 December 2004.*

### 2.0 Condition of the land at permit issue

(Receptor)

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

- a) Environmental setting including geology, hydrogeology and surface waters
- b) 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
- 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?

*Baseline reference data was not required as part of the application. The original application made by the applicant, Paramount Plating Limited, identified the activities on site as low risk through their environmental risk assessment.*

*Site setting, geology, hydrogeology and hydrology were all reviewed and assessed within the application site report which was accepted by the Environment Agency upon determination of the original permit on 21/12/2004.*

*Historical use of the site was reviewed by the applicant and submitted to the Environment Agency. Upon assessment, no link was identified between the sites previous uses as a glass works and wallpaper factory.*

### 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)**

- a) Permitted activities
- b) Non-permitted activities undertaken at the site

*The Environment Agency determined that the Installation comprised the following activities listed in Part 1 of Schedule 1 to the PPC Regulations and the following directly associated activities:*

### 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)**

- 2.3 A(1) (a) Unless falling within Part A(2) of this Section, surface treating metals and plastic materials using an electrolytic or chemical process where the aggregated volume of the treatment vats is more than 30m<sup>3</sup>

*Directly Associated Activities:*

- Chemical preparation of the work to be treated
- Storage and disposal of waste
- Treatment and disposal of effluent
- Disposal of surface water
- Post-treatment of the work (rinsing and drying)

*The activities comprised a single installation because the activities were deemed successive steps in one integrated industrial activity and all are carried out by the same operator at the same site.*

### 3.0(a) Environmental Risk Assessment

(Source)

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 applicants' assessment of likelihood of concluded that there is little likelihood of pollution.*

*The applicant did not identify any chromium or zinc compounds that are likely to be under the site in the application site report. This is based on the desk study information. The application identified that the site is concrete and potentially polluting activities are carried out within bunded areas. The Environment Agency considered that the risk of pollution from the site did not warrant the intrusive drilling through the concrete (thereby creating a pathway) to obtain reference data.*

*The Environment Agency considered that this report adequately described the condition of the site and in particular identified any substance in, on or under the land that may constitute a pollution risk.*

*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, (Conditions 2.1.2 and 2.10.9), the design of which was reported to the Environment Agency within two months from the date of permit issue, under Condition 4.1.7.*

*Following the Environment Agency's review of the applicants Environmental Risk Assessment improvement condition 1 was set within the permit to ensure that all considerations were made in line with BAT for the sector, it read as follows:*

*The operator shall review the risk assessment for the site to include but not be limited to:*

- *The prevention of incompatible materials / wastes coming into contact with each other*
- *Actions in the event of failure of the effluent treatment plant and its storage capacity*

*The risk assessment shall identify the hazard, probability, consequences and measures to reduce the risk. The operator shall provide the Agency with a written report of this review including a plan with time-scales for the implementation of the improvements identified.*

**3.0(b) Will the pollution prevention measures protect land and groundwater?**

(Conceptual model)

Are the activities likely to result in pollution of land?

No.

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?

Yes. *The pollution prevention measures were accepted at permit determination 21/12/2004.*

*Measures included:*

- *Sealed containment of areas where treatment activities were carried out*
- *Containment and bunding in areas where potential for spillage could occur*
- *Infrastructure (except sumps) were installed above ground*
- *Site founded upon concrete flooring with drainage channels to Effluent Treatment Plant (ETP).*
- *ETP within bunded area and all deliveries and storage of chemicals also within fully bunded areas.*

Application SCR decision summary	Tick relevant decision
Sufficient information has been supplied to describe the condition of the site at permit issue	Yes
Pollution of land and water is unlikely	Yes
Date and name of reviewer:	C G Dickinson 21/12/2004

## Operational phase SCR evaluation template

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

<b>4.0 Changes to the activities</b> (Source)	
<b>Have there been any changes to the following during the operation of the site?</b>	<b>Response</b> <b>(Specify what information is needed from the applicant, if any)</b>
a) Activity boundaries b) Permitted activities c) "Dangerous substances" used or produced	
<i>No changes during the operational life of the site under Environmental Permit EPR/BX8173IS.</i>	

<b>5.0 Measures taken to protect land</b> (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>Yes. The applicant has supplied evidence to accompany their application for surrender, including:</i> <ul style="list-style-type: none"><li>- <i>Site Condition Report for permit surrender</i></li><li>- <i>Operator Training Record of IPPC Permit at PPL</i></li><li>- <i>A copy of their Environmental Policy</i></li><li>- <i>Methodology for plant removal</i></li><li>- <i>Quarterly preventative maintenance checks at PPL</i></li><li>- <i>Document 2b Surrender Evidence</i></li><li>- <i>Copies of communications with Environment Agency at Pre-application Stage</i></li><li>- <i>Copies of site plans</i></li></ul>

<b>6.0 Pollution incidents that may have impacted on land and their remediation</b> 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 applicant has provided a statement within the application for permit surrender stating:</i>  <i>"Since the application was made in 2004 there have been no pollution incidents at the site of any type. We have not had any incidents of chemical spillages or plant leakages during the lifetime of this permit. Great care has been taken at all times to ensure our safety procedures are followed and as we only have two staff working in the plating shop it has been relatively easy to ensure these procedures have been followed."</i>

<b>7.0 Soil gas and water quality monitoring (where relevant)</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?
<i>Not applicable.</i>

## Surrender SCR Evaluation Template

### 8.0 Decommissioning and removal of pollution risk

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?

*All permitted activities have ceased to that of below the necessary regulated threshold and all sources of pollution risk have been removed as appropriate, the operator has provided the following statement relating to their requirements for permit surrender:*

*“Paramount Plating Ltd originally applied for a PERMIT TO OPERATE A PART A1 INSTALLATION UNDER THE POLLUTION PREVENTION AND CONTROL (ENGLAND AND WALES) REGULATIONS 2000 in 2004 due to the following regulation:*

*The site activities warrant a Part A (1) permit under the Pollution Prevention and Control (England and Wales) Regulations 2000 by virtue of section 2.3 (surface treating metals and plastic materials) of Schedule 1 of the Regulations, which requires any activity involving surface treating of metals and plastic materials using an electrolyte or chemical process where the aggregated volume of the treatment tanks is more than 30m<sup>3</sup>, to obtain a permit to operate. The aggregated volume of treatment tanks at PPL is 50m<sup>3</sup>. However since this time Paramount Plating has greatly down sized its plating and metal finishing operations. The Achrom and barrel plating production lines were removed in 2009/2010 due to a lack of work in these sectors making them unviable. (see attached PPL SITE AREAS AND WATER /EFFLUENT DETAILS) diagram. Which shows the layout as it was when the application was first submitted. This leaves only one rack Zinc plating plant on site which can be demonstrated to be well under the 30m<sup>3</sup> limit.*

*This process line is illustrated in the new layout diagram attached. The relevant processing tanks on this plant are two off tanks measuring 1.68mx1.68mx3.66m which is 11cubic metres each therefore total volume of both tanks to the brim would be 22 cubic meters. Well below the threshold level.*

*(‘The volume of the vat(s) determine whether an activity is listed, not the volume of the liquors used. The vat volume is considered to be the volume that can be contained up to the point of overflow’)*

*The above has been verified and accepted by the Environment Agency and we have acknowledged that the site will fall outside of the scope of the Environment Agency’s regulatory requirements.*

### 9.0 Statement of site condition

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?

Yes.

*The applicant has confirmed that infrastructure has been removed in an approved and safe manner preventing harm to the environment. Furthermore, the applicant has provided evidence confirming that pollution prevention measures have been both implemented and maintained throughout the life of the permit with no environmental incidents or accidents having been experienced during the sites regulation/activity since the granting of its environmental permit on 21/12/2004.*

*Therefore, the Environment Agency have reviewed and assessed the information submitted in support of the permit EPR/BX8173IS surrender and find the land to have been returned and maintained in a satisfactory state.*

<b>Surrender SCR decision summary</b> To be completed by GWCL officers and returned to NPS	<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 surrender the permit	<p style="text-align: center;">Yes</p>
Date and name of reviewer  M Derbyshire April 2015	<p style="text-align: center;"><i>M J Derbyshire</i></p>