## Application SCR evaluation template

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| Name of activity, address and NGR | West Carr Shaving Foam Manufacturer.<br><br>West Carr Lane,<br>Sutton Fields Industrial Estate,<br>Hull,<br>HU7 0BU.<br><br>National Grid Reference (NGR) of the approximate centre of the partially surrendered area is TA 09832 31928 (509832E, 431928N).<br><br>Environmental Permitting Reference EPR/BP3133M. |

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| Document reference of application SCR | IPPC Application Site Report. |

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| Date and version of application SCR | 03 August 2006 (duly made application). |

## 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.

The Operator provided a site report at the time the original application was made. Drawings have been provided by the Operator 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?**

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?

At the application stage the Operator provided an account describing the environmental setting, pollution history and incidents, and historical land uses which was reviewed and accepted by the Environment Agency at the application stage.

a) - the installation is approximately 0.12hectares of a 4.85hectare site located on a floodplain with the River Hull forming the southern boundary. The site is located on Made Ground, Alluvium, Glacial Till and Chalk. The chalk is a principle aquifer.

b) and c) - historically site uses have been agricultural and residential. The industrial estate was built in the late 1970's and the site originally made caravans before producing aerosols in 1984. The current site use began in the late 1980's. Surrounding land uses have included disinfectant works, sewage treatment works, paint works, oil mill and scrap metal yards. The site was split into four zones dependent on the type of potential pollutants contained within them. Sources, pathways and receptors of pollutants were adequately identified within the application conceptual site model.

d) – No baseline reference data has been collected for the installation or as part of the original application submission.

## 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<br>b) Non-permitted activities undertaken at the site | |

a) - The Environment Agency determined that the installation comprised the following activity as listed in Part 1 of Schedule 1 of the PPC Regulations at the time of the original application determination:

- S4.1(A)(1)(a)(xi) – producing organic chemicals such as surface-active agents (liquid soaps).

Directly associated activities undertaken at the site include waste storage and handling including waste packaging and chemicals generated by the process as well as raw material storage and handling where raw materials are brought in from the main chemical store, the perfume store and the short term storage area prior to use within a site process.

b) – There are no non-permitted activities undertaken at the installation but it should be noted that the installation is based within a larger manufacturing site.

## 3.0(a) Environmental Risk Assessment

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. It concluded that any emissions from the site would be insignificant, that measures considered appropriate for the installation would be taken to protect against pollution and that no significant pollution would be caused given its Low Impact Installation (LII) status. 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.

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

**Are the activities likely to result in pollution of land?**

Low Impact Installation (LII) criteria were met therefore as a result the installation intrinsically had only a low environmental impact without having to rely on significant management effort. As a LII and with regards to pollution prevention measures to protect land and groundwater, the installation:

- does not release more than 50$m^3$ of water per day as wastewater or effluent, typically the installations average is <5$m^3$ per day
- does not have any unplanned or fugitive releases of any substance into the ground or groundwater from the installation. All releases are contained within an area which has its own effluent collection system
- must comply with guidance criteria without having to rely on active abatement
- does not generate more than 1 tonne of Directive waste (or 10kg of Hazardous waste) per day, averaged over a year, with not more than 20 tonnes of Directive waste (or 200kg of Hazardous waste) being released in any one day. Less than 5 tonne per month is produced by the site and all waste is non-hazardous
- must at all times contain less than 10% of any lower tier qualifying inventory as set out in Schedule 1 of the Control of Major Accident Hazards Regulations (COMAH) 1999. The total amount of COMAH substances is <10% of the lower tier qualifying inventory.

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| The Environmental Management System (EMS) covers all aspects of the processes undertaken at the site and is externally accredited under ISO14001. |
| **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?** |
| As a LII installation, mass release of any particular substance to the environment at a rate more than is set out in the Environment Agency's H1 guidance note was unlikely. |

| **Application SCR decision summary** | **Tick relevant decision** |
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| Sufficient information has been supplied to describe the condition of the site at permit issue | Yes |
| Pollution of land and water is unlikely; or | Yes |
| Date and name of reviewer: | Liz Ebbs<br><br>21/01/2015 |

## 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

| 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) |
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| a) Activity boundaries<br>b) Permitted activities<br>c) "Hazardous pollutants" used or produced | |

a) - During the lifetime of the environmental permit, the activity boundary was changed as part of EPR/BP3133LM/V002. This was a small change to include an extra area of the site comprising a mixing bay area used for the preparation of sulphonated cleaning products. It is this partial surrender (EPR/BP3133LM/S003) that is removing that same area from the current environmental permit.

b) – There were no changes to the permitted activity at the site. The permitted activity within the surrender area remained as detailed within Environmental Permit.

c) – None. No hazardous pollutants have been used within the surrender area or produced as a result of the permit activities undertaken.

### 5.0 Measures taken to protect land

Has the applicant provided evidence from records collated during the lifetime of the permit, to show that the pollution prevention measures have worked?

Internal storage tanks and process vessels within buildings were on floors which sloped to a gully. Any material collected in the gully was pumped to a waste soap tank. Bunding was installed around the drum crusher and the waste drum storage area to prevent seepage and leaks from chemical residues in the crushed drums onto the hardstanding and an area of adjacent grass.

Bunds were subject to monthly planned inspections which were recorded. Any bund water was sampled and tested and if free of chemicals was pumped direct into the sewer system under agreement with Yorkshire Water. All blending tanks were bunded and waste disposed of via IBCs to the site non-hazardous waste tank. Spillage training was rolled out on an as needed basis and procedures and methods for waste drum crushing incorporated pollution prevention measures. Adequate secondary containment was provided for liquid raw materials, intermediate and product storage areas to prevent spillages going into the site drainage system and to sewer.

Records of any incidents, accidents and near misses were recorded, investigated and corrective and/or preventative actions taken where appropriate. Specified annual reporting was required to ensure continued compliance with the LII criteria. A Site Protection and Monitoring Programme was implemented to ensure continued effectiveness of pollution prevention measures to protect land and groundwater.

Appropriate management systems and structures were in place to ensure compliance, prevent accidents and minimise pollution. ISO14001 certification was maintained and an appropriate EMS was in operation across the site.

### 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)?

None. There have been no breaches of compliance and no pollution incidents have occurred during the permitted operation of the installation.

| 7.0 Soil gas and water quality monitoring (where relevant) |
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| 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? |
| None. No baseline soil and groundwater data was collected by the Operator as part of the original application submission. No intrusive soil and groundwater background data was collected for the variation made in 2012.<br><br>The decision to not carry out an intrusive investigation is in line with the requirements of the Environment Agency's H5 Guidance Note on Site Condition Reports, specifically 'Box 1'. |

## Surrender SCR Evaluation Template

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

| 8.0 Decommissioning and removal of pollution risk |
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| 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? |
| Decommissioning of the specific area has been undertaken to move all the existing equipment, product, wastes and potential sources of pollution etc from the area in order to meet partial surrender requirements. |

| 9.0 Reference data and remediation (where relevant) |
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| Has the applicant provided details of any surrender reference data that they have collected and any remediation that they have undertaken?<br><br>(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. |
| No land or groundwater samples were taken due to the nature of the site (LII) and its usage. No accidents involving spillages or pollution incidents occurred in the surrender area during its operation under the environmental permit.<br><br>The decision to not carry out an intrusive investigation is in line with the requirements of the Environment Agency's H5 Guidance Note on Site Condition Reports, specifically 'Box 1'. |

| 10.0 Statement of site condition |
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| 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 partially surrendered area of the site has been returned to the condition it was in prior to becoming part of the permitted installation. No contamination or pollution incidents occurred during the time it was operated under the Environmental Permitting Regulations and the necessary steps have been taken to ensure all pollution risks have been removed from this part of the site. |

| Surrender SCR decision summary | Tick relevant decision |
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| 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. | ✓ |
| Date and name of reviewer:<br><br>Liz Ebbs | 21/01/2015 |