

Application SCR evaluation template

Name of activity, address and NGR	<p>Activity: surrender</p> <p>Address: Arizona Chemicals Limited Vigo Lane Birtley Chester le Street County Durham DH3 2RB</p> <p>NGR: NZ 27866 53956</p>
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Document reference of application SCR	EPR/BT0251IT/S003
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Date and version of application SCR	October 2016 – Phase 1 Geoenvironmental Desk Study Arizona Chemicals, Vigo, Birtley for Arizona Chemicals Limited.
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8.0 Decommissioning and removal of pollution risk

To be completed by EM/PPC officers

Has the applicant demonstrated that decommissioning works have been undertaken and that all pollution risks associated with the site have been removed?

Production at the facility ceased in December 2015. There were six site visits during the period December 2015 to July 2016 at various points during the demolition and decontamination period. A final inspection was performed on 6 November 2017 by the Environment Agency. It was agreed that Arizona Chemicals Limited could proceed with permit surrender.

The facility was completely cleaned as per the Site Closure Plan with regular visits throughout by the PPC officer. The final site closure plan did not identify any significant pollution incidents. Therefore ground remediation work was not considered to be required. However, an intrusive soil investigation took place after the site went back to the brownfield condition. The investigation results were reviewed by the EA's Ground Contamination team and they agreed for permit surrender purposes that no remediation was required as there had been no degradation since the base analysis. The whole facility has been demolished and is now back to a brownfield location as shown in photo's provided (see Levelled area East 1 and Levelled area 2).

Also see:

- N16268 Arizona Chemicals Ltd DST & CMRA 31.10.2016
- Site Closure Plan 2015

Has any contamination of land that has occurred during these activities been investigated and remediated?

See answer to question 9.0

All permitted activities should have ceased and all sources of pollution risk should be removed before the Surrender SCR is produced.

9.0 Reference data and remediation (where relevant)

To be completed by GWCL officers

Has the applicant provided details of any surrender reference data that they have collected

See:

- N16268 Arizona Chemicals Ltd DST & CMRA 31.10.2016 – Overview of findings: Section 5 Borehole Records.
- Arizona Testing Pdf.
- Arizona DETS Analysis report of soil samples 12102016 report 16-80440 Pdf.
- Arizona Ground Investigation Proposal 201680818.
- 11-20 Soil Pdf.
- 21-22 Soil Pdf.
- 23-24 Soil Pdf.
- 25-26 Soil Pdf.
- AZC Soil Method Statement Pdf.
- Arizona Chemicals Weight xlsx.

and any remediation that they have undertaken?

Instances that have, or might have, impacted on the state of the site, were recorded along with details of the investigation and ameliorating work carried out. This ensured that there was a coherent record of the state of the site throughout the period of the IPPC Permit.

The procedures for fulfilling this requirement were included in the environmental management system. An incident reporting procedure was operated with internal trigger thresholds for all leaks and spills. There was also a procedure for the clean-up of such leaks or spills and for investigation to define the root cause of any such incident.

Incident reports were reviewed by the Environmental Management Team on a quarterly basis. Incident report logs were maintained by the EHS Department indefinitely. All incidents were recorded in a Global database for review by Arizona Chemical's Corporate EHS Team.

Recorded Incidents

March 2008 Incident

- Smell complaint received coming from storm drains
- Investigation work commenced and all drains on site were surveyed with cameras to identify cause, it was traced to an amount of clay material which was found in the drain.
- Further investigation showed that the drain point next to the clay skip bund was routed to the storm drains and not to the effluent interceptor system as thought. This was a historical design issue and small amounts of clay waste had been building up over the previous 18 years.
- Huge rainfall the previous 48hrs had pushed this blockage through the drains to a point where it lodged in the drain system behind local residential properties.

Corrective actions

- Arranged cleaning of all drains to remove contamination before it reached the NWL facility
- Confirmation with NWL that no contamination had occurred at their treatment facility.
- All drains on site and through neighboring site were relined post cleanup activities
- Drain point next to clay skip bund was rerouted to direct the flow through the effluent interceptor pit and grit catcher system

June 2015 Incident

- Bottom valves opened on fatty acid storage tanks overnight (intruders) releasing the product from the vessels. Fortunately due to the inventory volume this was contained within the secondary containment. (Concrete tank farm bund).

Corrective Actions

- The product was sampled and pumped back into the storage tanks and used as planned in manufacturing. A bund emptying process was in place which ensured that there was no contamination of product due to water or materials within the bund prior to the release.
- All tank bottom valves were then chained and padlocked to prevent further malicious activity
- The bund interior, external tank walls etc were power jetted by Total Recycling Ltd and the washings removed from site.

Any other spillages that occurred on site due to being a chemical manufacturing facility were small in nature (<25kgs) and within concrete bunded secondary containment.

(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.

10.0a Statement of site condition

To be completed by EM/PPC officers

Has the applicant provided a statement, backed up with evidence, confirming that the permitted activities have ceased, decommissioning works are complete

Yes – Production at the facility ceased in December 2015, there were six site visits during the period December 2015 to July 2016 at various points during the demolition and decontamination period. A final inspection was performed on 6 November 2017 by the Environment Agency. It was agreed that Arizona Chemicals Limited could proceed with permit surrender.

and that pollution risk has been removed and that the land and waters at the site are in a satisfactory state?

See answer to question 9.0

This section should be used if the operator is relying solely on records obtained during the operational phase of the activity. If no, specify why

10.0b Statement of site condition

To be completed by GWCL officers

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?

Baseline data from a limited number of samples collected in 2003 was compared to a data set collected in December 2016 after decommissioning (from report Phase II Geoenvironmental Appraisal, December 2016 produced by Patrick Parsons Ltd). From this comparison it appears that there has been no significant deterioration during the lifetime of the permit. Since this collection of baseline data, an area of ground identified as contaminated within this report has been excavated from site and disposed of, further reducing the pollution risk.

Surrender SCR decision summary

To be completed by GWCL officers and returned to NPS

Tick relevant decision

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; or

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Insufficient information has been supplied to show that pollution risk has been removed or that the site is in a satisfactory state – do not accept the application to surrender the permit. The following information must to be obtained from the applicant before the permit is determined:

Date and name of reviewer: Carol Mahoney 5/12/17