

Application SCR evaluation template

Name of activity and address	<p>SRL Performance Limited</p> <p>Bromborough Metal Oxide Powder Plant, Unit 8 Candy Park, Hardknott Road, Bromborough, Wirral, CH62 3QB</p> <p>National Grid Reference SJ 354 818</p> <p>Surrender application reference EPR/RP3130RD/S002</p>
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Document reference of application SCR Date and version of application SCR	<ul style="list-style-type: none"> • Document entitled 'Site Condition Report – Plant Closure Permit Surrender RP3130RD', dated 31.03.18 and prepared by SRL Performance Limited. <ul style="list-style-type: none"> ○ Annex A – Original Application Site Report. ○ Annex B – Clean down certificates for process plant. ○ Annex C – Waste transfer notes for disposal of materials. ○ Annex D – CAR Report from post-decommissioning visit.
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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/KP3736XR; accepted and determined on 02/03/2009.

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?

Provided in support of Environmental Permit application EPR/KP3736XR; accepted and determined on 02/03/2009.

The Application Site Report (ASR) contained details of:

- a) *the environmental setting: geology, hydrogeology and hydrology (made ground, glacial drift geology, and Permian and Triassic sandstone; major aquifer);*
- b) *Pollution history:*
 - *site history – from 1872 the land use is open land (primarily woodland) until 1936 when the first residential areas appear in Bromborough Village. In 1962 a number of buildings were developed on site as marked “works”, of which the oil storage depot was built towards the east of the proposed Installation. From 1971 – 1976, the site was occupied by a refrigerator factory, which includes a number of small buildings including an electrical*

2.0 Condition of the land at permit issue

(Receptor)

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

substation. The site and surrounding area has undergone some development since this time. The most significant change comprising demolition of the oil storage depot to the east of the installation.

- *site reconnaissance undertaken on 31st October 2007 and 12th November 2017;*
 - *no pollution incidents relating to the site recorded;*
 - *several pollution incidents to controlled waters registered with the Environment Agency between 1994 and 1999, with the closest being 112m from the site. Details provided in Section 3.2.1 of the ASR.*
- c) *No previous site investigation or assessment reports had been carried out at the site. The site reconnaissance undertaken found no visual evidence of contamination on the site. There was very little data available on existing contamination for the site, although the chemistry of the Installation activities appears to be substantially different from historic activity.*
- d) *No baseline data was collected at the time of the ASR.*

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 installation manufactured metal oxide powders for use in the production of fuel cell components and thus was permitted under, Section 4.2 A(1)(a)(v) Producing inorganic chemicals such as non-metals, metal oxides, metal carbonyls or other inorganic compounds such as calcium carbide, silicon, silicon carbide, titanium dioxide.

The facility also included the following directly associated activities:

- *Water de-mineralisation plant*
- *Abatement of emissions to air – gas scrubbing tower providing abatement for ammonia emissions*
- *Waste handling*
- *Compressed air system*
- *Particulate removal system – filtration of fugitive dust emissions (via air cyclone)*
- *Space heating*

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.

Risk assessment provided in support of Environmental Permit application EPR/KP3736XR; accepted and determined on 02/03/2009.

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

(Conceptual model)

Are the activities likely to result in pollution of land?

The ASR concluded that the activities proposed at the Installation would not present a high risk of contamination, and measures in place would ensure a good degree of control at the Installation to prevent any contamination occurring.

The Environment Agency reviewed the ASR and accepted that the report adequately described the condition of the land and identified all substances present that could constitute a pollution risk. It was concluded that pollution of the land was unlikely, and the risk from the Installation was low.

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?

The storage of chemicals is not considered likely to cause any significant risk of pollution to land or groundwater. The storage area is in a cool and dry area with a bund of adequate capacity and quality.

Regular bund inspections are undertaken at the site according to the relevant internal procedures.

As stated above it was concluded that pollution of land and water was unlikely. The ASR was accepted at permit determination of EPR/KP3736XR on 02/03/2009.

Application SCR decision summary	Tick relevant decision
Sufficient information has been supplied to describe the condition of the site at permit issue	Accepted at permit determination of EPR/KP3736XR on 02/03/2009
Pollution of land and water is unlikely	Accepted at permit determination of EPR/KP3736XR on 02/03/2009
Date and name of reviewer: (signature of authorising officer on permit)	M. G. Jenkins 2nd March 2009

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>	
<i>The permit was transferred in 2014 under application reference EPR/RP3830VN/T001, and again in 2015 under application reference EPR/RP3130RD/T001.</i>	

5.0 Measures taken to protect land (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 installation was fully contained within the process building and the whole production area was bunded. Storage tanks were independently bunded and transfer between vessels was via closed/sealed/welded pipework. The infrastructure was regularly inspected as part of the maintenance schedule.</i>
<i>The site had an environmental management system in place, which included procedures for:</i> <ul style="list-style-type: none">• <i>Production pre and post-checks.</i>• <i>Equipment calibration.</i>• <i>Preventative maintenance, including regular site walkovers.</i>• <i>Identifying, recording and investigating any non-conformances.</i>• <i>Staff training.</i>
<i>The report indicate that the pollution prevention measures in place at the site have worked.</i>

6.0 Pollution incidents that may have impacted on land and their remediation (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. The Environment Agency's records also indicate that no incidents have been recorded during the lifetime of the permit.</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?
<i>N/A – no soil, gas and water quality monitoring was undertaken at the site during its operational phase.</i>

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
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?
<i>All permitted activities have ceased and all sources of pollution risk removed.</i>
<i>All plant and equipment was cleaned and removed from site. All waste was removed from site by a contractor and documentation was included within the supporting information. No spillages occurred during the decommissioning of the site.</i>

9.0 Reference data and remediation (where relevant)
Has the applicant provided details of any surrender reference data that they have collected and any remediation that they have undertaken?
(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.
<i>N/a – No baseline data was requested during the determination of permit EPR/KP3736XR, therefore no data is required for the surrender.</i>

10.0 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?
<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>
<i>The Regulatory Officer undertook a final site inspection on 19/02/18 and confirmed that it has been fully decommissioned.</i>
<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>

Surrender SCR decision summary	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	✓
Date and name of reviewer: Kirsty Hobbs (Permitting Officer – NPS) – 01/06/18 Laura Mellor (Permitting Officer – NPS) – 11/06/18	