

Application SCR evaluation template

Name of activity and address	<p>J. H. Richards and Co. Limited.</p> <p>J. H. Richards and Co. Limited, 112/126 Saltley Road, Birmingham, B7 4TD.</p> <p>Surrender application reference EPR/BP3730ZP/S003.</p>
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Document reference of application SCR Date and version of application SCR	<ul style="list-style-type: none"> Document entitled 'J H Richards – Application to surrender the Environmental Permit (Full) – Supporting Document', reference MCP/EP/Surrender Oct 17, dated 25/05/18 and prepared by Nicola Clarke Additional information submitted on 09/07/18 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/BP3730ZP; accepted and determined on 16/12/2013.

2.0 Condition of the land at permit issue

(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/BP3730ZP; accepted and determined on 16/12/2013.

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 facility operated under Standard Rules SR2009NO2 (Low Impact Installation), and manufactured and refurbished white metal bearings for heavy engineering and the electrical supply industry.

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/BP3730ZP; accepted and determined on 16/12/2013.

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

(Conceptual model)

Are the activities likely to result in pollution of land?

Yes – 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 16/12/2013.

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 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 16/12/2013.

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/BP3730ZP on 16/12/2013
Pollution of land and water is unlikely	Accepted at permit determination of EPR/BP3730ZP on 16/12/2013
Date and name of reviewer: (23/07/2018)	<i>Kirsty Hobbs</i>

Operational phase SCR evaluation template

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	
No changes during the operation of the site.	

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?
<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 16/12/2013.</i></p> <p><i>The site implemented an Environmental Management System, which was certified to ISO 14001. A bi-annual assessment of legal compliance was undertaken by an Environmental Consultant, and no findings were raised during the lifetime of the permit to indicate any risk of pollution from the site.</i></p> <p><i>During the operation of the permit an internal audit programme was in place which included pollution control measures, infrastructure and operation control relating to the Environmental Permit.</i></p>

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)?
<p><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 (EPR/BP3730ZP).</i></p>

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

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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>The permitted activities ceased in 2017 and decommissioning is complete with no pollution risk remaining on site.</i>
<i>Further details of the decommissioning steps undertaken are provided in the Supporting Document.</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>No baseline data requested during determination, 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>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 reviewers: Kirsty Hobbs (NPS – Permitting Officer) – 23/07/18 Laura Mellor (NPS – Permitting Officer) – 26/07/18	