

**Permit: EPR/JP3836SE Allnex Resins**

**Operational phase SCR evaluation template**

<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> (Specify what information is needed from the applicant, if any)
a) Activity boundaries b) Permitted activities c) "Dangerous substances" used or produced	
<p><b>Activity boundaries</b> Surrender SCR states no changes to activity boundary over the lifetime of the permit.</p> <p><b>Permitted Activities</b> Surrender SCR states that since the permit was issued there has been a steady reduction in site operations due to changing business conditions. After July 2007 the only listed activity remaining operational was powder resin manufacture, carried out in building 85 (high temperature powder polyester resin production process) and building 80 (one-ton pilot batch, high temperature powder polyester resin production process). Large areas of the site were decommissioned in 2007, including high temperature polyester and alkyd liquid resin production process, low temperature epoxy melamine and gum rosin solutions production process, and low temperature acrylic and epoxy resins solution production process. A large amount of ancillary activities relating to the chemical processes were also discontinued (details page 14 of Surrender SCR). Four (4) air emission points remained after 2007, reduced from 28. All permitted activities ceased as of December 2019.</p> <p><b>"Dangerous substances"</b> Surrender SCR states no "dangerous substances" have been used or produced as a result of the permitting activities that had not been identified already in the Application SCR.</p>	
<b>5.0 Measures taken to protect land</b> To be completed by EM/PPC officers (Pathway)	
Has the applicant provided evidence from records collated during the lifetime of the permit, to show that the pollution prevention measures have worked?	
Yes – see Section 5 of the Surrender SCR, in particular Table 5-1 and Appendix 4 for examples.	
<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)?	
Surrender SCR, Appendix 5 details a list of pollution incidents and corrective actions implemented. There was just one incident involving the release of a hazardous substance to ground, involving a diesel spill on 4/12/2007. The volume of the spill was small and there was no impact to soil as the dispensing nozzle was located within a bunded area.	
<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?	
Surrender SCR states environmental monitoring of the site soil, gas and groundwater was not required during operation. Environmental monitoring took place in 2018 and once permitted activities had ceased at the end of 2020 (see below).	

## Surrender SCR Evaluation Template

<b>8.0 Decommissioning and removal of pollution risk</b>
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? Has any contamination of land that has occurred during these activities been investigated and remediated?
Surrender SCR includes this detail in Section 8, with examples in Appendix 6. Decommissioning was completed by October 2020. The (low) pollution risk associated with the infrastructure and its decommissioning has been removed. No pollution incidents required remediation during the decommissioning process.

<b>9.0 Reference data and remediation (where relevant)</b>
To be completed by GWCL officers
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.
Sufficient data has been provided and no further action is required by the operator

<b>10.0a Statement of site condition</b>
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 and that pollution risk has been removed and that the land and waters at the site are in a satisfactory state?
Surrender SCR (page 36) Section 10 provides a 'Statement of Site condition'. It states that as of December 2019 the permitting activities undertaken at the site have ceased. Decommissioning was completed by October 2020, with many vessels, tanks, pipework and equipment removed and any that remains emptied and cleaned. Pollution risk has been removed at the site by cessation of operations and subsequent decommissioning. The intrusive soil and groundwater investigations carried out in 2018 and August 2020 identified decreases in concentrations of organic contaminants between 2005 and 2018/2020.

<b>10.0b Statement of site condition</b>
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?
Yes

<b>Surrender SCR decision summary</b>	<b>Tick relevant decision</b>
To be completed by GWCL officers and returned to NPS	
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	X CDurrant 20/01/2021
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	