

Application SCR evaluation template

Name of activity, address and NGR	<p>Bio-UK Fuels (Sheffield) Limited.</p> <p>Unit 17, Newhall Road Industrial Estate, Sanderson Street, Sheffield, S9 2TW.</p> <p>National Grid Reference (NGR) of the approximate centre of Unit 17 is: SK 37686 89320.</p> <p>Environmental Permit Reference EPR/QP3632GJ.</p>
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Document reference of application SCR	Application Site Condition Report (SCR).
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Date and version of application SCR	17 January 2007.
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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.	
The Operator provided a SCR 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?	
<p>a) Environmental setting including geology, hydrogeology and surface waters</p> <p>b) Pollution history including:</p> <ul style="list-style-type: none"> • 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 <p>c) Evidence of historic contamination (i.e. historical site investigation, assessment, remediation and verification reports (where available))</p> <p>d) Has the applicant chosen to collect baseline reference data?</p>	
<p>a), b) and c) - this site was located in an industrial area in Sheffield surrounded by several other industrial units. The installation comprised one industrial unit plus a small outside area as defined on the environmental permit Site Plan. Bio-UK Fuels (Sheffield) Limited was the sole Operator of the installation. At the application stage the Operator provided a site report describing:</p> <ul style="list-style-type: none"> ➤ a conceptual site model (CSM) showing the potential source, pathway and receptor linkages of identified pollutants ➤ an account of the environmental setting relating to the site and its surrounds ➤ potentially polluting substances in, on or under the land that may constitute a pollution risk ➤ the condition of the site ➤ any associated risks and pollution prevention measures. 	

2.0 Condition of the land at permit issue

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

There was no evidence or reason to suspect that either groundwater or land had been polluted by historical contamination. The CSM demonstrated that there was little likelihood of historical pollution at the site or within the immediate wider environment.

d) - The installation was originally consented under an earlier regulatory regime (Pollution, Prevention and Control – PPC) and an intrusive investigation was not undertaken at the time of conversion to the Environmental Permitting Regulations (EPR). No baseline data was collected by the Operator as part of the original application submission. As a Low Impact Installation (LII) there is rarely any requirement for intrusive investigations to be undertaken.

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
- 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:

- Section 4.1 Part A(1) (a)(ii) Producing organic chemicals such as organic compounds containing oxygen, such as alcohols, aldehydes, ketones, carboxylic acids, esters, ethers, peroxides, phenols, epoxy resins.

There were no directly associated activities undertaken at the site.

Bio-diesel was manufactured at the installation using virgin vegetable oils, waste vegetable oils and methanol. A catalyst and a proprietary purification resin was used to purify the finished product. Oils were brought to the site by tanker, one tonne intermediate bulk containers and smaller barrels and containers. The oil was transferred via above ground pipework to a series of above ground storage tanks.

Bio-diesel was produced in a fixed automatic batch unit which incorporated a pre-heat tank and a transesterification unit where the catalyst and methanol were added and glycerine was separated and was discharged to a separate tank. The bio-diesel was sent to a purification unit where it was passed through the resin which removed water and impurities. After purification, the bio-diesel was transferred via above ground pipes to a series of above ground finished product storage tanks. The bio-diesel was then despatched from these tanks via an automatic shut off pump direct to waiting vehicles.

b) - There were no non-permitted activities undertaken at the 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 Operator's assessment of the environmental impact of emissions from the installation was submitted, checked and agreed at the original application stage (EPR/AP3536MA/A001). 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 LII status.

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?
<p>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. It was concluded that there was little likelihood of pollution arising from the operation of the installation provided that it was operated and maintained correctly. To ensure the continued effectiveness of pollution prevention measures to protect the land the Operator was required to implement and operate under a Site Protection and Monitoring Programme.</p> <p>As the installation was a LII and with regards to pollution prevention measures to protect land and groundwater, the installation:</p> <ul style="list-style-type: none"> ➤ could not release more than 50m³ of water per day as wastewater or effluent ➤ could not have any unplanned or fugitive releases of any substance into the ground or groundwater from the installation. There were no direct discharges of hazardous substances or non-hazardous pollutants to groundwater from the site ➤ must comply with guidance criteria without having to rely on active abatement ➤ could not give rise to more than one tonne of Directive waste or 10kg of hazardous waste per day with no more than 20 tonnes of Directive waste or 200kg of hazardous waste released in any one day ➤ could not have more than 10% of any substance listed in the Control of Major Accident Hazards (COMAH) Regulations 1999, Schedule 1. <p>The Environmental Management System (EMS) covered all aspects of the processes undertaken at the site. An adequate EMS demonstrated that management and competence for the relevant activities on site were in place to prevent pollution.</p>
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 this was a LII installation, mass release of any particular substance to the environment at a rate more than was set out in the Environment Agency's H1 guidance note was unlikely.

Application SCR decision summary	Tick relevant decision
Sufficient information has been supplied to describe the condition of the site at permit issue	Yes
Pollution of land and water is unlikely	Yes
Date and name of reviewer:	Liz Ebbs 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)
a) Activity boundaries b) Permitted activities c) "Hazardous pollutants" used or produced.	
<p>There were no changes to the permitted activity boundary and the permitted activity within the surrender area remained as detailed within Environmental Permit EPR/QP3632GJ until the cessation of bio-diesel production at the site as below:</p> <ul style="list-style-type: none">➤ Section 4.1 Part A(1) (a)(ii) Producing organic chemicals such as organic compounds containing oxygen, such as alcohols, aldehydes, ketones, carboxylic acids, esters, ethers, peroxides, phenols, epoxy resins. <p>There were no changes in the hazardous pollutants used at the site during the life of the environmental permit. Schedule 1 (COMAH) substances were kept on site. However, they were in very small quantities being approximately 5 tonnes compared to the COMAH threshold of 500 tonnes.</p>	

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?	
<p>The main production plant and storage vessels were located within an industrial unit which had a sealed concrete floor which provided a sealed bund used to control any spills or leaks. Doorways and entrances were protected using ramps and the yard outside the unit was tarmacked and in good condition. Drip trays were provided for the bio-diesel processing machine components. Bio-diesel was despatched from the tanks via an automatic shut off pump direct to waiting vehicles. Spill kits were available in the case of drips and spills and instruction on dealing with these given in a spill response plan.</p> <p>A Site Protection and Monitoring Programme was implemented to ensure continued effectiveness of pollution prevention measures to protect land and groundwater. The activity was managed and operated by appropriate management systems and structures that were in place to ensure compliance, to prevent accidents and to minimise pollution.</p> <p>A site closure plan was produced by the Operator via an improvement condition within the environmental permit (IC2). This plan indicated how buildings, infrastructure and any remaining oils/fuels, chemicals and wastes would be dealt with when the site is closed or decommissioned. The plan also included a record of any pollution incidents which occurred during the operation of the permitted site together with the steps taken to remedy that pollution at the time. The information within this plan established whether the site was in a satisfactory state when the permitted activity ceased and the permit was surrendered. The plan was maintained on site, updated as circumstances changed and reviewed every two years. It captured the following:</p> <ul style="list-style-type: none">➤ wastes including unused chemicals, glycerol and oils disposed of following the duty of care➤ infrastructure dedicated to the recycling of oil and production of fuel removed or taken out of use➤ cleaning thoroughly the remaining buildings both internally and externally to avoid any potential risk of pollution➤ securing of the remaining buildings.	

No pollution incidents occurred during the permitted operation of the installation by Bio-UK Fuels (Sheffield) Limited. Some housekeeping issues relating to small spillages inside the building being tracked over the bund onto the yard by FLT were highlighted during a site inspection in 2012. The Operator was given an action to improve the housekeeping and a repeat visit confirmed that some improvement had been made. The building benefited from a concrete floor internally and the outside area was tarmac and therefore it is considered that the operations will have had negligible impact on the land. Concrete building bunds were visually inspected and were in good order. Appropriate measures were in place to ensure that accidents that may cause pollution were minimised.

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.

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)?

No pollution incidents have occurred during the permitted operation of the installation by Bio-UK Fuels (Sheffield) Limited.

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?

No baseline data was collected by the Operator as part of the original application submission.

No intrusive investigations have taken place to collect any soil or water monitoring data.

No intrusive investigation was undertaken at the time of converting to the Environmental Permitting Regulations.

As a LII there is rarely any requirement for intrusive investigations to be undertaken.

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

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?

A SCR was submitted by the Operator with the surrender application dated 10 November 2014. The Operator maintained a site closure plan which demonstrated how the activity could be decommissioned to avoid any pollution risk and return the site to a satisfactory state. Decommissioning of the site was undertaken to move all the existing processing equipment, product, associated storage, wastes and potential sources of pollution etc from the existing site premises to new premises in order to meet permit surrender requirements.

The programme of works comprised:

- all storage tanks and equipment moved to the new premises (once containment measures have been put in place there)
- all bulk wastes and products removed to the new premises. Waste exemptions in place for the new site for temporary storage, prior to the issue of an environmental permit
- all physical bunding (concrete) removed mechanically and recycled
- walls, ceiling and floor cleaned and painted

The site is to be handed back to the Landlord once the surrender application has been granted.

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.

No land or groundwater samples have been taken due to the nature of the site (LII) and its usage. As a LII there is rarely any requirement for intrusive investigations to be undertaken.

All bunds have been maintained in good order.

The site will remain concrete floored and bunded until all pollution risks have been removed.

The internal concrete floors (within the building) are in good condition and the external yard remain tarmacked and in good condition. Therefore, it is considered that the operations will have had negligible impact on the land.

No accidents involving spillages or pollution incidents occurred at the site during its operation under the environmental permit.

10.0a and 10b 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?

The programme of works was to fully decommission the installation by 14 January 2015. During decommissioning all sources of potential pollution risk were removed. All materials and wastes associated with the regulated activity were removed from site. The likelihood of pollution to the land was negligible during site operations. It can be confirmed that:

- the permitted activity has stopped
- decommissioning is completed
- any pollution risks have been removed
- the land is in a satisfactory condition to hand back to the landlord and to surrender the site environmental permit.

A final site inspection made by the Environment Agency confirmed that the processing equipment, storage bunds and all waste has been removed from the site. Four plastic drums remaining in the corner of the unit were collected by and disposed of by an appropriate contractor. Necessary steps have been taken to ensure all pollution risks have been removed from the site and the unit was in a satisfactory state to allow the permit to be surrendered.

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: Liz Ebbs	21/01/2015