

Application SCR evaluation template

Name of activity, address and NGR	Two Sisters Food Group Ltd (2SFG)
Document reference of application SCR	Willand Abattoir, Lloyd Maunder Road, Willand, Cullompton, Devon, EX15 2PJ.
Date and version of application SCR	A1177 Geo-Environmental Report May 2014 (AGS Ground Solutions). Relates to area of land being surrendered only.

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. A map of the permitted area along with emissions points to air and water has been provided

The Operator did not provide a revised site report at the time when the permit was transferred on 05/08/08 from Lloyd Mauder. A site report was commissioned in 2014 relating to the area of land being surrendered only- A1177 Geo-Environmental Report May 2014 (AGS Ground Solutions). This was to produce baseline data should the site be redeveloped.

2.0 Condition of the land at permit issue

To be completed by GWCL officers
(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?

At the application stage the Operator provided an account describing the environmental setting, pollution history and incidents, and historical land uses which was reviewed and accepted by the Environment Agency at the application stage. Unable to retrieve the original SCR though this extract if from DD when the permit was first issued

- *Prior to Lloyd Maunder occupying the site, the site was used predominately for agricultural purposes and would therefore have very little contaminant input above background level. Other potential sources of historic contamination include the backfilling of gravel and clay workings with unknown materials and the presence of former railway sidings running through the site.*
- *The site has been assessed as of high sensitivity with regards groundwater due to the underlying minor aquifer. Again the site is assessed as being of high sensitivity with respect to surface waters due to the Spratford Stream being located adjacent to the Installation and the Installation's treated effluent is discharged to this stream.*
- *Current activities within the Installation could have potential to lead to future ground contamination, these have been identified as tank storage of liquid fuels, small scale storage of chemicals, effluent plant operations and temporary storage of biological waste.*
- *There are several oil storage tanks around site that could pose a pollution risk. These include: an insufficiently bunded diesel tank (used for vehicles), an additional below ground diesel tank, an additional insufficiently bunded boiler fuel oil storage tank, a decommissioned underground ground petrol tank and waste engine oil is stored in a bunded tank. With the exception of the*

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decommissioned underground petrol tank, none of the existing fuel tanks are formally tested for pressure and or integrity.

- *The sodium hydroxide and ferric sulphate storage tanks are stored in line with BAT requirements in the ETP area that drains to the ETP, therefore these are considered a little likelihood of pollution*
- *The effluent treatment plant has the potential to cause pollution, in addition to the areas of unmade ground used for temporary storage of animal waste and the areas of animal waste (blood tank) storage*
- *In addition there is a blood storage tank which is currently unbunded.*
- *There are three surface water discharges to unlined ditches and have been identified under section C3. The site report has identified 'that some surface water is allowed to flow into ditches surrounding the site'. However, the individual ditches have not been identified in the site report (although one of the ditches is not within the installation boundary).*
- *Additional information has identified that the ETP lagoons and oxidation ditch have also been identified as not being lined and have therefore been identified as a potential emission to groundwater (however, this has not been identified by the site report, therefore additional information including a D2 assessment has been provided (received 07/02/05).*
- *The likelihood of pollution has been assessed as per table 2a/b in H7: Guidance on the Protection of Land Under the PPC Regime: Application Site Report and Site Protection and Monitoring Programme.*
- *The Agency disagrees with the Applicants assessment of 'little likelihood' of pollution arising from the Oxidation Ditch as submitted on 07/02/05. The Ditch does not have full primary containment – no lining is present on the base of the Ditch therefore there is the likelihood of leakage of the contents of the Ditch into the ground beneath and hence into groundwater. Table D2 (as submitted on 07/02/05) also indicates that the Applicant has little confidence in the liner on the sides of the Ditch. Information was supplied as to groundwater; however, no groundwater gradient is given so the data supplied cannot be shown to be relevant without this further information. It is also unclear whether any groundwater data has been collected from between the Oxidation Ditch and the Spratford stream. The Agency has concluded that there is reasonable possibility of pollution and therefore requires reference data for this area to be supplied as part of the Site Protection Monitoring Programme.*
- *Baseline reference data has been collected for the part of the installation being surrendered. A1177 Geo-Environmental Report May 2014 (AGS Ground Solutions).*

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

Following the ceasing of the slaughter of lambs and processing of red meat within the installation the permitted activities are.

Section 6.8 A(1)(b) – "Slaughtering animals at plant with a carcass production capacity of more than 50 tonnes per day. Slaughter of chicken and lambs for the food industry to processing.

Section 5.4 A(1)(a)(i) – Disposal of non-hazardous waste in a facility with a capacity exceeding 50 tonnes per day by biological treatment

Directly Associated Activity

Meat and by-product processing and packaging

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)
Raw materials, finished products and other material storage and handling Waste storage and disposal Burning of fuel Surface water collection and disposal Refrigeration Plant	

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.

3.0(b) Will the pollution prevention measures protect land and groundwater? (Conceptual model)	
Are the activities likely to result in pollution of land?	
If Yes, specify what additional controls/checks may be necessary	
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?	

Application SCR decision summary	Tick relevant decision
Sufficient information has been supplied to describe the condition of the site at permit issue	
Information is missing- the following information must be obtained from the applicant.(Advise the permitting team on what additional information is needed)	
Pollution of land and water is unlikely; or	
Pollution of land and water is likely (Advise the permitting team on what additional controls/checks may be necessary)	
Historical contamination is present- advise operator that collection of background data may be appropriate	
Date and name of reviewer:	

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>The 2 Sisters Food Group Limited (2FSG) bought the business from Lloyd Mauder, in 2008. The original permit LP3737PN was transferred on 05/08/08 to the new owners and given a new permit number EPR/QP3633GP. The Mauder family retained ownership of the land that the business sits on and Lloyd Mauder Holdings Limited leased this back to 2SFG. Until 19/04/09, 2SFG were entitled to use all of the land within the installation boundary. After this date 2SFG were only entitled to use two pockets of land, the land on which the main poultry and meat cutting/packing buildings stands and the effluent treatment plant (ETP), with a right of access between the two. Although de-commissioning of the operations within the lamb plant and red meat cutting/packing, further processing and sausage departments was undertaken in 2009 and buildings demolished the land has remained within the permitted installation boundary until now March 2016 when a part surrender application has been received.</i>	

5.0 Measures taken to protect land 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?
If no, specify why

6.0 Pollution incidents that may have impacted on land and their remediation 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)?
Have all pollution sources associated with the incident been investigated and remediated such that they will not lead to pollution after permit surrender e.g. pipe work containing raw materials?

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?
If no, specify why

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
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?
<i>De-commissioning of the operations within the lamb plant and red meat cutting/ packing, further processing and sausage departments took place in 2009 as referred to in Permit Variation EPR/QP3633GP/V002 issued on 30/04/10 The remaining buildings were demolished in 2010. Despite repeated requests that 2SFG apply to part surrender, no part surrender application was made until this year, February 2016.</i>
<i>In the intervening time a Land Contamination Report was commissioned in May 2014 to primarily establish a baseline to allow the redevelopment of the land, the installation of an Anaerobic Digester. A permit application has now been received.</i>

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 and any remediation that they have undertaken? Yes, surrender reference data is presented in A1177 Geo-Environmental Report; TJ2434AR1
(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.
Where surrender reference data is needed, applicants will only need to collect this for the measures/areas where they can't show that there has been no change in the condition of the land using the information collected during the life of the permit. Refer to Sections 3 & 4 above.
When assessing whether any baseline reference data is relevant, you must consider whether it relates to the appropriate media (e.g. soil, groundwater, gas) substances and area of the site.

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 and that pollution risk has been removed and that the land and waters at the site are in a satisfactory state?
<i>The partially surrendered area of the site has been returned to the condition it was in prior to becoming part of the permitted installation. No contamination or pollution incidents occurred during the time it was operated under the Environmental Permitting Regulations and the necessary steps have been taken to ensure all pollution risks have been removed from this part of the site.</i>

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? Yes
If no, specify why

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	Yes, accept the application to part surrender the permit.
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 Adel Albadran 12/4/2016	