

Application SCR evaluation template

Name of activity, address and NGR	Tradebe Solvent Recycling Limited. Morecambe Solvent Management, Middleton Road, Heysham, Morecambe, Lancashire, LA3 3JW. NGR of the approximate centre of the site is SD 415 595. Environmental Permit Reference EPR/BL7302ID/S006.
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Document reference, date and version of application SCR	03 January 2017, EPR/BL7302ID/S006.
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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 Site Condition Report (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 (2005).	

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>	
Items a) to c) above have been described sufficiently in the original SCR submitted in 2005 and confirmed as complete in 2005.	
d) no targeted intrusive investigations were required to be undertaken to support the original application.	

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)
<p>a) Permitted activities</p> <p>b) Non-permitted activities undertaken at the site</p>	
<p>The applicant has applied to surrender a scheduled activity from their current permit which will remove the sites ability to burn both solvent and aqueous wastes through Combustion Unit 1 (CU1). The unit was used for liquid wastes only as a means of dealing with materials which could not be sold on as secondary liquid fuels. Other sites owned by the same company have suitable incinerators so any future wastes generated that cannot be sold onwards can be disposed of via these other facilities so that there is no waste stockpiling issues. The site will continue to treat and process waste though the remaining permitted activities. The partial surrender comprises:</p> <ul style="list-style-type: none"> ➤ removal of the scheduled activity Section 1.1 A(1)(b)(iii): burning any fuel manufactured from, or comprising any other waste in an appliance with rated thermal input of 3MW or more but less than 50MW (CU1). This will have no capacity to incinerate waste and will serve as a 'standby boiler' to CU2 ➤ retaining the directly associated activity 'Combustion of fuel in a boiler with rated thermal input of 3.8MW for the production of steam for use in distillation processes' as the main combustion unit (CU2). 	

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 Environment Agency reviewed the Operator's environmental risk assessment (H1) including the potential for environmental impact from emissions to air and water. The H1 was reviewed at the time of the original permit determination and accepted as satisfactory. 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?

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. There were no direct discharges of hazardous substances or non-hazardous pollutants to groundwater from the site.

The unit that burns hazardous solvent wastes has ceased to operate and thus no longer has the potential to release emissions to air from this specific waste incineration activity. All equipment and pipelines associated with the burning of waste materials through the unit have been physically disconnected. The unit will still be able to burn 'non-waste' fuels and serve as a back-up (standby) boiler to raise steam for distillation when the main site boiler is shut down for maintenance or inspection purposes. The tank storage will continue to be used to hold product grade distillate fuel as allowed within the scope of activities that are detailed within the site permit. The site will continue to carry out the other activities that are detailed within the permit and not specified as being part of the partial surrender application EPR/BL7302ID/S006.

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 Environmental Management System included operational procedures covering all aspects of the waste process and associated activities undertaken across the wider site. All procedures were regularly reviewed and audited. Processes were designed and measures continually taken to avoid pollution risk which could result from the operations on site.

However, as a scheduled activity is being surrendered with the associated land remaining within the permitted boundary and potentially being affected by ongoing site operations, the Applicant will be expected to fully assess this land at the time when the permit is surrendered in full.

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 reviewers: Liz Ebbs (NPS) - 07/03/2017 Stuart McDonald (GWCL) – 17/03/2017	