

## Application SCR evaluation template

Name of activity, address and NGR	<p>Bideford Site.</p> <p>Alverdiscott Road Industrial Estate, East-the-Water, Bideford, Devon, EX39 4LQ.</p> <p>National Grid Reference of the site is ST 246840 125880.</p> <p>Environmental Permitting Reference EPR/LP3138MB.</p>
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Document reference of application SCR	IPPC Application Site Report.
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Date and version of application SCR	October 2006.
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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 report 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?

- 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.

The installation is approximately 0.2Ha, the surrounding land slopes slightly in a northwards direction, is divided into level platforms around the central roadway, has residential land to the west and open land on all other sides. It is underlain by the Westphalian Upper Carboniferous deposits of the Bude Formation which is a minor aquifer of low permeability. There are no surface waters within the site boundary.

No baseline reference data has been collected for the installation or as part of the original application submission.

<b>3.0 Permitted activities</b>	
<b>Has the applicant provided the following information as required by the application SCR template?</b>	<b>Response (Specify what information is needed from the applicant, if any)</b>
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 A(1)(a)(xi) – producing organic chemicals such as surface-active agents.  b) – There are no non-permitted activities or directly associated activities undertaken at the installation.	

<b>3.0(a) Environmental Risk Assessment</b>
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. 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 Low Impact Installation (LII) status. The H1 was reviewed at the time of the original permit determination and accepted as satisfactory.

<b>3.0(b) Will the pollution prevention measures protect land and groundwater?</b>
<b>Are the activities likely to result in pollution of land?</b>
Low Impact Installation (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. As a LII and with regards to pollution prevention measures to protect land and groundwater, the installation:  <ul style="list-style-type: none"> <li>➤ does not release more than 50m<sup>3</sup> of water per day as wastewater or effluent, typically the installations average is &lt;5m<sup>3</sup> per day</li> <li>➤ does not have any unplanned or fugitive releases of any substance into the ground or groundwater from the installation. All releases are contained within an area which has its own effluent collection system</li> <li>➤ must comply with guidance criteria without having to rely on active abatement</li> <li>➤ does not generate more than 1 tonne of Directive waste (or 10kg of Hazardous waste) per day, averaged over a year, with not more than 20 tonnes of Directive waste (or 200kg of Hazardous waste) being released in any one day. Less than 5 tonne per month is produced by the site and all waste is non-hazardous</li> <li>➤ must at all times contain less than 10% of any lower tier qualifying inventory as set out in Schedule 1 of the Control of Major Accident Hazards Regulations (COMAH) 1999. The total amount of COMAH substances is &lt;10% of the lower tier qualifying inventory.</li> </ul> <p>The Environmental Management System (EMS) covers all aspects of the processes undertaken at the site and is externally accredited under ISO14001. Appropriate measures were taken against pollution and that no significant pollution were caused.</p>
<b>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?</b>
As a LII installation, mass release of any particular substance to the environment at a rate more than is set out in the Environment Agency's H1 guidance note was unlikely.

<b>Application SCR decision summary</b>	<b>Tick relevant decision</b>
Sufficient information has been supplied to describe the condition of the site at permit issue	Yes
Pollution of land and water is unlikely; or	Yes
Date and name of reviewer:	Liz Ebbs 11/03/2015

## Operational phase SCR evaluation template

Sections 4.0 to 7.0 may be completed annually in line with normal record checks.

<b>4.0 Changes to the activities</b>	
<b>Have there been any changes to the following during the operation of the site?</b>	<b>Response (Specify what information is needed from the applicant, if any)</b>
a) Activity boundaries b) Permitted activities c) "Hazardous pollutants" used or produced	
a) - During the lifetime of the environmental permit, the activity boundary was changed as part of EPR/LP3138MB/V002.  b) – There were no changes to the permitted activity at the site. The permitted activity within the surrender area remained as detailed within Environmental Permit.  c) – None. No hazardous pollutants have been used within the surrender area. Hazardous waste is stored in secure bunded areas elsewhere on site. Swallowfield remains a low impact site and meets the requirements of the environmental permit.	

<b>5.0 Measures taken to protect land</b>
Has the applicant provided evidence from records collated during the lifetime of the permit, to show that the pollution prevention measures have worked?
Hazardous waste storage areas were secured and have adequate bunding and protection. Spill kits were throughout the site at strategic locations. The surface and foul water drainage systems were well marked on site.  Specified annual reporting was required to ensure continued compliance with the LII criteria. A Site Protection and Monitoring Programme was implemented to ensure continued effectiveness of pollution prevention measures to protect land and groundwater.  Appropriate management systems and structures were in place to ensure compliance, prevent accidents and minimise pollution. ISO14001 certification was maintained and an appropriate EMS was in operation across the site. Internal audits are carried out on a monthly basis and BSI carries out ISO14001 surveillance audits every six months.

<b>6.0 Pollution incidents that may have impacted on land and their remediation</b>
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)?
None. There have been no breaches of compliance and no pollution incidents have occurred during the permitted operation of the installation.

<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?

No baseline soil and groundwater data was collected by the Operator as part of the original application submission. No intrusive soil and groundwater background data was collected for the variation made in 2012.

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.

<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?	
All permitted activities should have ceased and all sources of pollution risk should be removed before the Surrender SCR is produced.	

<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.	
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.	

<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?	
This section should be used if the operator is relying solely on records obtained during the operational phase of the activity. If no, specify why	

<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?	
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'.	

<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	
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	