

## Application SCR evaluation template

(To be completed by NPS, GWCL and EM/PPC officers).

Name of activity, address and NGR	Moorwell Incinerator, Porthmellon Waste Management Site, Porthmellon, St Mary's, Isles of Scilly, TR21 0JY
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Document reference of application SCR	The original permit Decision Document states (Section B4) that Application Site Report was provided within the application. However, we have been unable to locate this document. The original application indicated that there is a 'reasonable possibility' of future pollution of the land and therefore reference conditions must be established and limits set. Collection of reference data was required (Condition 2.10.12.1) within 6 months from the permit issue. However, it appears that reference data was not collected as the applicant states in section 1.4.1 of the Site Condition Report submitted to support the surrender application EPR/TP3732SE/S004 that there are no baseline conditions recorded.
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Date and version of application SCR	See above.
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<b>1.0 Site details</b> To be completed by NPS (Source)	
<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>
Site plans showing site layout, drainage, surfacing, receptors, sources of emissions/releases and monitoring points	We are satisfied that appropriate site plans were provided and accepted at permit determination 14/11/05.

<b>2.0 Condition of the land at permit issue</b> To be completed by GWCL officers (Receptor)	
<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) Environmental setting including geology, hydrogeology and surface waters b) Pollution history including: <ul style="list-style-type: none"> <li>• pollution incidents that may have affected land</li> <li>• historical land-uses and associated contaminants</li> <li>• visual/olfactory evidence of existing contamination</li> <li>• evidence of damage to existing pollution prevention measures</li> </ul> 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?	The applicant states that application SCR was not submitted in 2005 and therefore no reference data was collected.

<b>3.0 Permitted activities</b> To be completed by NPS officers (Source)	
<b>Has the applicant provided the following information as required by the application SCR template?</b>	<b>Response</b>
a) Permitted activities b) Non-permitted activities undertaken at the site	Small Waste Incineration Plant (SWIP) DAA – Collection and disposal of uncontaminated surface water

<b>3.0(a) Environmental Risk Assessment</b> To be completed by NPS officers (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.	We are satisfied that appropriate environmental risk assessments were provided and accepted at permit determination 14/11/05.

<b>3.0(b) Will the pollution prevention measures protect land and groundwater?</b> To be completed by EM/PPC officers (Conceptual model)	
Are the activities likely to result in pollution of land?	The original permit Decision Document states that secondary containment is present for the fuel oil and sewerage tanks but the remaining potentially polluting substances held on site do not have secondary containment. These include the APC residue, bottom ash and the bottom ash quench tank. Cleaning water from the installation and waste can be deposited on the hardstanding next to the reception pit. This could potentially lead to leachate from the wastes draining to the surface water. Improvement requirement IP6 was imposed to address this issue. A conceptual model concluded that there is a reasonable possibility of potential pollution from the installation. To ensure the effectiveness of pollution prevention measures to protect the land the operator was required to implement and operate under a Site Protection and Monitoring Programme (SPMP). We considered that SPMP would address issues such as integrity testing, bunding and monitoring of groundwater and surface water run-off.
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?	Please see above. The majority of the site is covered by hardstanding and appropriate equipment for dealing with spillages is stored in the local area. Hazardous substances such as fuel oil is stored in a double skinned self bunded storage tank on hard standing.

<b>Application SCR decision summary</b> To be completed by GWCL officer and returned to NPS	<b>Tick relevant decision</b>
Sufficient information has been supplied to describe the condition of the site at permit issue; or	Sufficient information provided.
Pollution of land and water is unlikely; or	Yes, pollution of land and water is unlikely.
Historical contamination is present- advise operator that collection of background data may be appropriate	Not present.
Date and name of reviewer Adel Albadran , 5/1/2017	

## Operational phase SCR evaluation template

<b>4.0 Changes to the activities</b> To be completed by EM/PPC officers (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	<p>The installation boundary has changed twice during the life of the permit. The permit boundary was extended in 2011 (Variation EPR/TP3732SE/V002) to include an area to the northwest to allow an operation of bulky waste fragmenter, and in 2014 the same area of land was removed from the permit under a partial surrender application EPR/TP3732SE/S003.</p> <p>Variation EPR/TP3732SE/V002 determined in 2011 included an addition of directly associated activity (DAA) to allow size reduction of stockpiled bulky waste. Within the surrender application EPR/TP3732SE/S003 the DAA was removed from the permitted activities.</p> <p>Fuel Oil has been stored in a double skinned self bunded and alarmed storage tank on hard standing in the south east of the site.</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?	During the operation of the facility there are no records or details of any land pollution incidents. Tanks and bunding have been visually inspected several times a day. There are no underground pipes on site. The surface water drainage is via an interceptor. The applicant and site inspector have provided records of the condition of the site and the process of decommissioning. This information was provided at the time of application to surrender the permit. The site has been inspected periodically since it was first permitted. No obvious evidence of failure of the pollution prevention measures has ever been noted.

**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)?

The applicant has stated that there are no records or details of any pollution incidents that may have impacted the condition of the land during the operation of the site.

**7.0 Soil gas and water quality monitoring (where relevant)**

To be completed by GWCL officers

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?

Yes, water quality monitoring has been undertaken, which shows no changes in land conditions.

## Surrender SCR Evaluation Template

### 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?

A Site Decommissioning Plan was produced in July 2007 and updated upon the decision to decommission and demolish the site in February 2015. The incinerator formally ceased operation on 20<sup>th</sup> December 2014 and the Environment Agency was notified in writing of the cessation of activities on 3<sup>rd</sup> February 2015. The Environment Agency accepted the Site Closure Plan on 21<sup>st</sup> May 2015 that describes the following site closure operations:

- Removal of Incinerator Bottom Ash & APC residue
- Removal and disposal of potentially hazardous materials
- Decontamination, decommissioning and dismantling of all structures and infrastructure
- Excavation and removal of potentially contaminated ground and foundations to a depth of 1m
- Disposal of plant, metals and electrical equipment
- Identification, treatment and segregation of all materials suitable for recycling

All sources of pollution risk and infrastructure have been removed prior to the surrender application. This has been confirmed through the site inspector.

No areas of contamination were observed or reported during the demolition of the installation and therefore no further investigation was undertaken. We are satisfied that there is no requirement to carry out post demolition investigation.

### 10.0 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?

There is no requirement to provide a statement as the operator has collected surrender reference data and not relying solely on records obtained during the operational phase of the activity.

**9.0 Reference data and remediation (where relevant)**

To be completed by GWCL officers

<p>Has the applicant provided details of any surrender reference data that they have collected and any remediation that they have undertaken?</p> <p>(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.</p>	<p>There is no need to further investigation or data as there isn't any contamination issues.</p>
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**10.0 Statement of site condition**

To be completed by GWCL officers

<p>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?</p>	<p>Yes, even the monitoring boreholes have been capped.</p>
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**Surrender SCR decision summary**

To be completed by GWCL officers and returned to NPS

	<b>Tick relevant decision</b>
<p>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</p>	<p>Yes</p>
<p>Date and name of reviewer Adel Albadran , 5/1/2017</p>	