

Application SCR evaluation template

Name of activity, address and NGR	<p>Eastman Chemical Workington Ltd Siddick Acetone Recovery, Siddick Workington Cumbria CA14 1LG</p> <p>EPR/AP3435XB/S004</p> <p>National grid reference: NY 007 317</p>
Document reference of application SCR	<p>Application Site Report, reference 44319735/R2122, dated November 2005 prepared by URS.</p> <p>Design SPMP, reference 443320102/MARP00003 dated 27th November 2006 prepared by URS.</p> <p>First Phase reporting of SPMP, reference MARP0001 44320203 dated March 2007 prepared by URS</p> <p>Revised SPMP, reference 44320102/MARP00003 dated January 2009 prepared by URS.</p> <p>Revised SPMP, reference 44320102/MARP00003 dated January 2014 prepared by URS.</p>
Other documents reviewed	<p>Decision document for PP3136SG (issued 29th September 2006)</p> <p>ASR checklist dated 12th May 2006</p> <p>Handover Document dated 26th September 2006</p> <p>Memo dated 15th January 2007 sent from CL officer to inspector. This memo also included a copy of the Design SPMP review checklist.</p>
Date and version of application SCR	<ul style="list-style-type: none"> - Application Surrender Supporting Information – Site Condition Report - Application Surrender Eastman Chemical Workington Ltd Closure Plan - Application Surrender Addendum (Sept 2015) to ECWL site closure plan - Application Surrender Eastman Chemical Workington Ltd Site Closure Plan Figures 1 to 5

Sections 1.0-3.0 have been completed in 2015 following receipt of a surrender application using information from the 2005 Application Site Report, ASR checklist, the Decision Document and the handover document.

1.0 Site details

To be completed by NPS
(Source)

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 Application Site Report (ASR) contained all relevant plans and drawings to allow determination. All information, submitted in support of application EPR\PP3136SG, was assessed by the Environment Agency and accepted as satisfactory.

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))

Has the applicant chosen to collect baseline reference data?

The ASR contained details of:

- The site setting including geology (raised beach deposits and boulder clay overlying carboniferous Whitehaven Sandstone), hydrogeology (minor aquifer now a Secondary A aquifer) and surface waters (Totter Gill runs in culvert under the site).
- Pollution history: 14 incidents recorded around the site and all but one classified as minor. One classified as cat 2 significant for release to water and this is attributable to the site. This incident comprised the release of treated effluent to coastal waters (see appendix C4).
- The ASR included a copy of an "Appraisal of hydrogeological conditions in the vicinity of the Eastman Chemical Ectona Ltd Plant", reference EA2702A dated December 1997 prepared by Aspinwall and Company (see Appendix C5). The report details that a site investigation was undertaken at the site in 1991 designed to monitor the groundwater and a further round of groundwater monitoring undertaken in 1997. The 1991 site investigation comprised of the installation of 7 boreholes (201-206, 207Shallow and 207Deep).

Nb: The report does not contain copies of the borehole logs but there is a summary table of ground the installation details. The report indicates that there is a channel in the boulder clay infilled with coarse drift deposits and orientated northeast to southwest. Groundwater flow follows the infilled channel.

The report states that analysis of soil and groundwater samples did not identify the presence of acetone or ethylene glycol above the limit of detection (0.45mg/l). Nb: the soil results are not included within the report but the 1991 groundwater results are.

The 1997 groundwater monitoring indicates the presence of 2- methyl-1,3 dioxolane and 1,4 Dioxane at concentrations of 100mg/l and 45mg/l respectively in a borehole (BH201) located on the western boundary of the site. These contaminants are consistent with the process effluent stream from the neighbouring Polymer plant (Siddick Polymers). The report does not contain

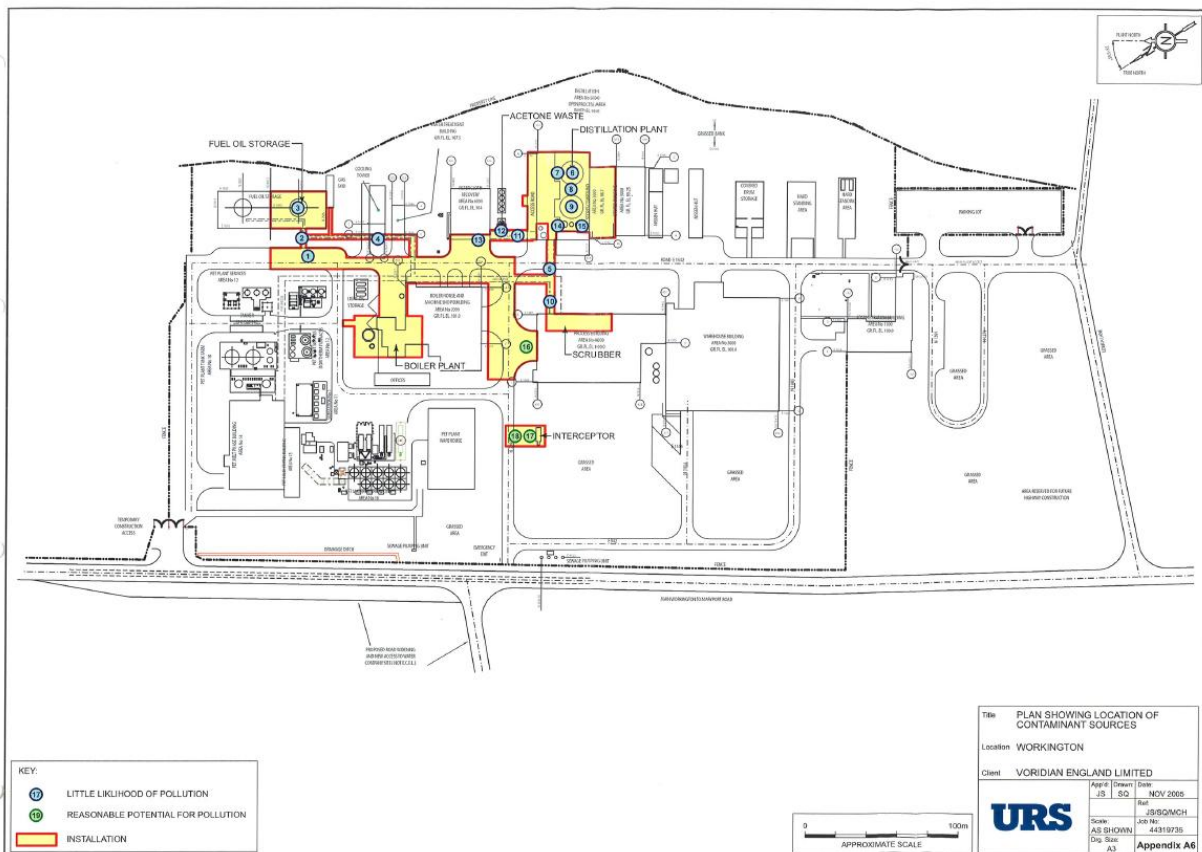
2.0 Condition of the land at permit issue

To be completed by GWCL officers
(Receptor)

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

copies of the laboratory results for the groundwater sampling undertaken in 1997.

When the application was submitted the applicant assessed their infrastructure in terms of whether there was a "little likelihood" or "reasonable possibility" of pollution and this assessment was undertaken in Tables 2A and 2B (contained in Appendix D2). The assessment identified that the transfer from the scrubber to the interceptor during site shut down, the storage within the interceptor and the transfer to the road tanker of the acetone water mix posed a "reasonable possibility" of pollution. Shut down occurs on approximately a two-yearly basis (see Section 4.7 of the ASR).



A review of the Application Site Report dated 12th May 2006 summarised that for the majority of the site the risk of pollution was "little likelihood" but there was a "reasonable possibility" for the scrubber, drainage and interceptor. The review recommended that a camera survey be undertaken for the drains.

To ensure the continued effectiveness of the pollution prevention measures, the Operator was required to implement and operate under a Site Protection and Monitoring Programme. In addition, collection of reference data was required and requested through the permit (conditions 2.8.1 and 3.6.5).

The handover document dated 26th September 2006 stated that a Design SPMP should be submitted within 2 months of permit issue and reference data should be submitted within 6 months (by 29th March 2007) for the zones identified in the ASR and the Decision Document (Section C6). In addition, the handover document states that the SPMP "should address groundwater issues from previous contamination and include issues relating to the current condition and integrity of the drainage system".

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?

In line with permit requirements a Design SPMP was issued to the Environment Agency in 2006¹. The objectives of the Design SPMP were to propose an investigation to collect reference data for all activities that had been identified as “reasonable possibility of pollution” in the ASR. The SPMP also outlined the proposed maintenance, inspection and testing regime for pollution prevention measures over the lifetime of the permit.

Following on from this a SPMP: First Phase Reporting: Assessment of Reference Data Report was issued in 2007². The objectives of this report were to set reference data for the site following the installation of permanent monitoring points and the collection and analysis of soil and groundwater samples.

Further discussion of the SPMP reports are contained in Section 7.0 of this document.

3.0 Permitted activities

To be completed by NPS officers
(Source)

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

- a) Permitted activities
- b) Non-permitted activities undertaken at the site

a) *Permitted activities are referenced in Table S1.1 of the permit.*

- *30.7 and 24.1 MW thermal input boilers:*
- *Recovery by distillation of acetone*
- *DAA – acetone scrubbers to remove acetone from acetone laden air prior to the reuse of recovered acetone in the acetone tow production process.*

b) *Non permitted activities*

- *Storage of waste materials*
- *Storage of boiler and cooling water chemicals (all sorted with primary and secondary containment)*
- *Storage of raw materials (acetone, cellulose acetate and titanium dioxide).*

¹ Design SPMP, reference 443320102/MARP00003 dated 27th November 2006 prepared by URS

² First Phase reporting of SPMP, reference MARP0001 44320203 dated March 2007 prepared by URS

3.0(a) Environmental Risk Assessment

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.

The risk assessment conducted in the original Application Site Report determined there to be a 'little likelihood of pollution' to the ground and or groundwater beneath the installation with the exception of the transfer and storage of waste scrubber liquor (acetone water mix) from the scrubber units during plant shut down. Shut down occurs on approximately a two-yearly basis (see Section 4.7 of the ASR). All emissions to water were considered as insignificant. Emissions to air likely to affect the surrounding area and identified habitat sites from the installation are unlikely to lead to any breaches of relevant Environmental Assessment Levels (EAL), Environmental Quality Standards (EQS) or National Air Quality Standards (NAQS).

3.0(b) Will the pollution prevention measures protect land and groundwater?

To be completed by EM/PPC officers

(Conceptual model)

Are the activities likely to result in pollution of land?

The Application Site Report identified that there is the potential for the activities and operations on site to cause pollution to land. These activities relate to the transfer from the scrubber to the interceptor during site shut down, the storage within the interceptor and the transfer to the road tanker of the acetone water mix. Shut down occurs on approximately a two-yearly basis (see Section 4.7 of the ASR). To ensure the continued effectiveness of the pollution prevention measures, the Operator is required to implement and operate under a site protection and monitoring programme.

An Improvement Programme (IP) was included in the permit (PP3136SG) and the following are relevant to ensuring that the land and groundwater beneath the site will be protected.

IP1: requested the production of an assessment of the Best Available Techniques in relation to collection of shut down drainings from the interceptor. The deadline for this work was set as 1st February 2007.

IP2: requested that a site drainage survey should be undertaken to demonstrate the condition and integrity of the drainage system and a written report produced. The deadline for this work was set at 1st April 2007.

IP7: requested that a Site Closure Plan should be produced. The deadline for this work was set at 1st April 2008.

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?

Yes. The facility has appropriate containment measures and management arrangements to ensure prevention of pollution from leaks, accidents and incidents with the exception of activities related to the transfer from the scrubber to the interceptor during site shut down, the storage within the interceptor and the transfer to the road tanker of the acetone water mix. Shut down occurs on approximately a two-yearly basis (see Section 4.7 of the ASR).

In line with permit requirements, a Design SPMP was issued to the Environment Agency in 2006. Following on from this a SPMP: First Phase Reporting: Assessment of Reference Data Report was issued in 2007.

Further discussion of the SPMP reports are contained in Section 7.0 of this document.

Application SCR decision summary To be completed by GWCL officer and returned to NPS	Tick relevant decision
Sufficient information has been supplied to describe the condition of the site at permit issue; or	Yes
Pollution of land and water is unlikely with the conditions set within the permit	Yes
Historical contamination is present- advise operator that collection of background data may be appropriate	Yes
Date and name of reviewer	<i>M J Peacock</i> M J Peacock, 2005

Operational phase SCR evaluation template

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

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

4.0 Changes to the activities

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)

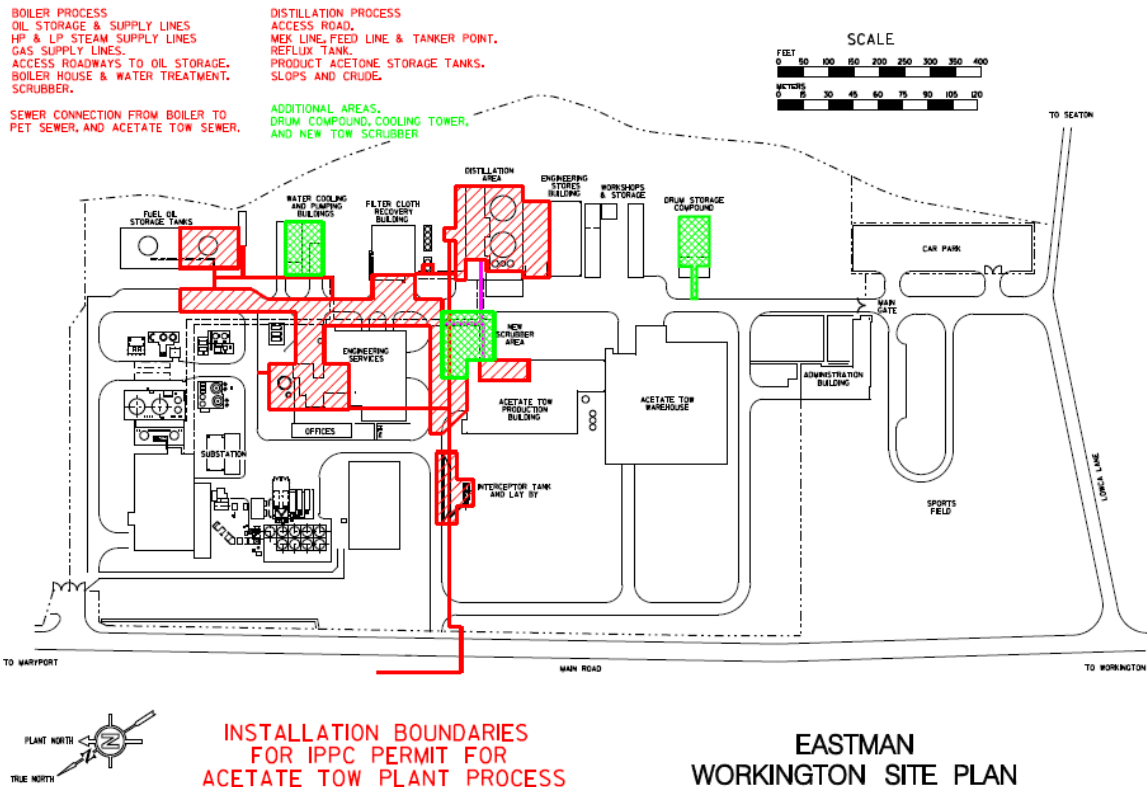
- Activity boundaries
- Permitted activities
- "Dangerous substances" used or produced

Permit PP3136SG was determined on 29/09/2006 (Eastman Chemical England Limited). This superseded the original IPC authorisation AW5085 18/12/96 and IPC variation BY4599 10/01/05 (Voridian England Limited).

Full transfer application (AP3435XB) from Eastman Chemical England Limited to Eastman Chemical Workington Limited on 29/02/08

Variation EPR/AP3435XB/V002 determined on 14/11/08 - for the addition of two scrubbing units, incorporation of water cooling towers and chilling systems, addition of a drum storage compound, upgrading of the acetone distillation column to allow additional throughput and associated minor installation boundary changes as a consequence of these changes. There are also minor amendments to correct errors in the permit that could not be corrected at the time of transfer.

The installation boundary increased following this variation to include the drum compound, vertical scrubber area and cooling towers. The plan below shows the original permit boundary in red and the additional areas in green.



Variation - EPR/AP3435XB/V003 determined on 09/01/14 - Agency variation to implement the changes introduced by IED

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?

Yes.

Information relating to Improvement Programme 1 was submitted on 20th March 2007. The report indicated that the interceptor collects water, Fabricol emulsion, hydraulic and lubricating oils and acetone and that some of the pollution prevention measures were not best practice. In particular:

- there was no fixed and bunded remote connection point for the tanker hose so there is the potential for spillage during transfer; and
- there is no fixed connection point to the interceptor, with a dip leg to ensure complete draining there is the potential for minor spillage.

The report recommended that a borehole should be installed in this area to ensure that pollution of the land and groundwater do not occur during the life of the permit.

A letter dated 29th March 2007 was submitted to the Environment Agency in relation to IP2. The letter stated that "preliminary observations indicate that there are few, if any problems with the condition of the sewer". However, the company were still waiting for a report from the contractor. The letter also stated that "the condition of the interceptor will be checked before the start of planned maintenance shutdown in April 2007".

A Site Closure Plan, reference 49306506/LEP0001 dated 8th May 2008 and prepared by URS was submitted in relation to IP7. This plan has subsequently been updated in January 2014 (Site Closure Plan Report, Issue no 4, reference 49306506/LEP0001 prepared by URS).

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)?

A Part A Notification was sent to the Environment Agency on 4th August 2008 reporting the failure of the process sewer line.

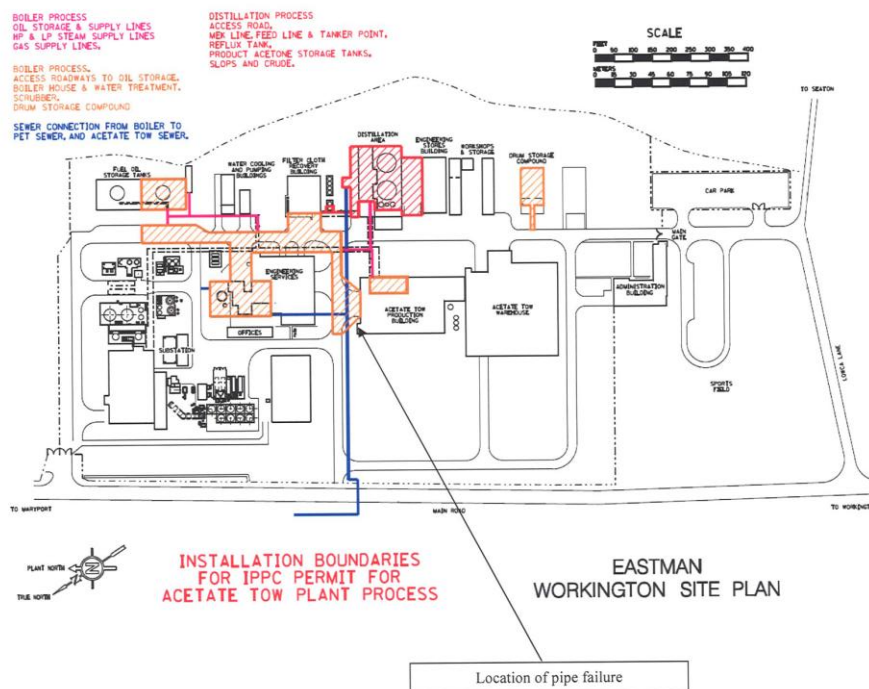
During the repair of the underground fire water pipes the associated excavation uncovered the process sewer line from the main 401 building to the underground interceptor. Whilst the pipe was uncovered heavy rains cause the pipe to fail and a maximum 10m³ of water was lost.

The Part B Notification dated 5th December 2008 proposed the following activities to demonstrate that the incident had not impacted the ground/groundwater and that a similar incident could not happen in the future:

- 3 monthly borehole sampling on BHs 401, 402 and 201 will be carried out.
- an inspection pit to be dug downstream of the affected area near to a junction with another process sewer line. This is to allow CCTV integrity checking on sections of the process sewer line that were not previously accessible. This work is to be carried out by the end of February 2009.

A response from the inspector on 12th December 2008 stated that no further action was required.

Attachment 1: Site Plan Showing Location Of Failed Pipe



The Site Surrender Report identifies a number of reportable and non-reportable environmental events in Appendix A2. With the exception of the failure of the process sewer line none indicate that contamination of the land had occurred.

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?

A Design SPMP was submitted to the Environment Agency in November 2006. The report proposed to install two boreholes (BH4012 and BH402) and utilise one that was already installed (BH201).

BH201: down inferred hydraulic gradient of the interceptor

BH401: down inferred hydraulic gradient of the pipeline linking the scrubber to the interceptor

BH402: down inferred hydraulic gradient and adjacent to the interceptor

The following sampling regime was proposed: soil samples from the two new boreholes and groundwater samples from all boreholes and all samples to be analysed for acetone. Additional groundwater sampling was proposed for every two years.

A review of the Design SPMP by an Environment Agency Contaminated Land Officer noted that the proposed soil testing was not MCERTS accredited. The memo recommended that the groundwater sampling should be undertaken more frequently than proposed. In addition, the memo noted that tables 2A and 2B (Appendix D2 of the Application Site Report) identified a number of single skin overhead pipelines which crossed areas of permeable ground.

A meeting was held on site on 16th January 2007 between the operator, the inspector and the Contaminated Land Officer. At this meeting the Environment Agency raised its concerns over the frequency of groundwater monitoring, the acetone analysis and the pipelines crossing over permeable ground.

Clarification on acetone analysis was submitted by email on 29th January 2007 confirming that precision and bias was within those detailed for Volatile Organic Compounds within the Environment Agency document entitled "performance standard for laboratories undertaking chemical testing of soils".

The First Phase Report was submitted to the Environment Agency in March 2007. BH logs for BH201 were included with the BH logs of the newly installed boreholes which were installed in February 2007(see appendix D). The baseline reference data was reported as follows:

Soils	BH401 1.5m	BH401 4.1m	BH402 2.0m	BH402 4.0m
Acetone (mg/kg)	0.03	0.02	<0.01	<0.01

Groundwater samples were collected on 26th February 2007 and analysed for acetone:

Groundwater	BH201	BH401	BH402
Acetone (ug/l)	<10 10 (duplicate sampled)	<10	<10

The First Phase Report states that groundwater sampling will be undertaken every 2 years within 1 week of the scrubber cleaning liquids being discharged into the interceptor.

CAR form 23rd August 2007 states that the SPMP Phase 1 report has been received and that there is an area requiring further investigative work. It is unclear what this relates to but I have assumed that it is associated with the levels of COD (chemical oxygen demand) observed in groundwater samples.

Letter dated 18th February 2008 from Eastman provides a revised borehole sampling proposal. The letter includes graphs of COD results for boreholes BH205, BH302 and BH305: which appear to be decreasing. The letter indicates that groundwater analysis for acetone in BH401 and BH402 will be undertaken every 3 months.

Variation EPR/AP3435XB/V002 included an Improvement Programme requirement (IP8) for the operator to review the SPMP with a deadline of 31st January 2009. A revised SPMP was submitted in January 2009.

The revised SPMP included an assessment of the pollution potential from the new activities undertaken at the site and re-evaluated the improved pollution prevention measures associated with the transfer and storage of waste scrubber liquor during plant shut down. The assessment concluded that the risk associated with these activities had a "little likelihood" of causing pollution of the land. Consequently, no further environmental monitoring was proposed at the site, although ongoing borehole monitoring will be undertaken as part of the operators internal procedures.

The revised SPMP states that the CCTV survey conducted in March 2007 identified no integrity issues and that further surveys would be undertaken every 5 years.

A revised SPMP dated January 2014 was submitted in support of the permit surrender (Appendix C). No environmental monitoring was included in the report. The report indicates that no further CCTV survey has been undertaken at the site since 2007.

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?

All permitted activities have ceased and all sources of pollution risk have been removed.

The site has now been fully decommissioned as of 20/07/15.

Detail regarding each area inspected is as follows:

Gas Oil Tank / Bund – clean and empty – 17/07/15

Interceptor – waste documentation relating to the removal of interceptor contents from site were seen (17/07/15).

Boiler House – some contamination noted on final inspection 17/07/15. Waste documentation and photographic evidence seen for disposal of these contaminants on 20/07/15. All areas clean and uncontaminated.

Above ground storage tanks – vessel decontamination master list seen with items signed off; external areas inspected, all clean and uncontaminated.

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?

The SCR submitted with the application states that the permitted activities have stopped; decommissioning is complete and any pollution risk has been removed; and the land is in a satisfactory condition.

The PPC site officer has carried out 3 site visits on 21/05/2015, 02/06/201 and, 17/07/2015.

On 2nd July pollutants remaining in the bunds (slight film) were not able to reach ground/ groundwater and ditto for the remaining contaminants in the building within the permitted installation. The Heating and Ventilation units only contained R407C (gas) were removed by 5th June 2015. The applicant has provided evidence of final removal of contaminants from the permitted site on 20/07/15.

The PPC site officer confirmed that there would be no chance of spillages to the ground occurring at the site from the 3rd June 2015 onwards.

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?

(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.

The relevant sections of the Site Surrender Report containing information on soil and groundwater quality are discussed below:

Appendix E contains a summary table of quarterly groundwater monitoring undertaken at the site between 2007-2015 for boreholes BH201, BH401 and BH402. No laboratory data sheets have been provided.

The summary indicates that in the main concentrations are at the limit of detection with the following exceptions:

BH401: Feb 2009 10ug/l; Dec 2010 14ug/l & Feb 2011 19ug/l
BH201: Feb 2009 13ug/l & Feb 2011 18ug/l

The elevated levels identified in February 2009 and December 2010 could be due to the failure of the process sewer line, though no interpretation has been provided.

None of the concentrations are significantly elevated above the limited of detection and therefore the site activities do not appear to have impacted the groundwater.

Appendix F contains a comparison of groundwater monitoring data collected from 1991 with those collected in 2015 for BH201, BH204, BH205, BH207, BH301, BH302 and BH305. The 2015 samples were collected on the 3rd June 2015 as agreed with the site inspector and following the removal of all chemicals from the installation.

Please note that a comparison should have been made between the 2007 baseline data and the 2015 surrender data for boreholes BH201, BH401 and 402. This comparison has been undertaken in the table below:

Groundwater		BH201	BH401	BH402
Acetone (ug/l)	2007	<10 10 (duplicate sampled)	<10	<10
	2015	<1	<1	<1

Appendix G contains a copy of a "Trial Pit Excavation and Analysis" Report, reference 191-01-10-15 prepared by ExCaL dated July 2015. The report details the excavation of 3 trial pits across the site from which soil samples were collected. These results are compared with soil samples collected at similar locations in 1991 as follows: TP1 & BH205, TP2 & BH203 and TP3 & BH204.

Unfortunately, none of these locations are in the areas of concern identified in the Application Site Report and additionally the analytical suite does not include acetone.

A schedule 5 was issued on 14th October 2015 requesting the following information:

- There was an incident relating to a fracture in the process sewer line in 2008. One of the actions proposed by Eastman Chemical Workington was to undertake a CCTV survey. Please can you confirm if this survey was carried out and what the results of the survey were?
- Groundwater monitoring has been undertaken at the site quarterly since 2007, as part of the surrender application this was only provided as summary information. Please could you submit the laboratory datasheets to support this data?

The operator responded on 20th and 21st October with copies of all the laboratory datasheets (with the exception of December 2007). In addition the operator confirmed that a CCTV survey was not completed following the process sewer pipe fracture in 2008 and that it was agreed with the inspector that boreholes (BH401, BH402) located adjacent to the equipment where the failure occurred would be sampled and tested routinely.

The following summarises the previous sections of this template:

The ASR identified that activities associated with the two yearly site shut down relating to the transfer and storage of scrubber drainings posed a 'reasonable possibility' of pollution to the land. By 2009 improvements had been made to these activities and at this time an assessment of the pollution prevention measures indicated that there would be "little likelihood" of pollution to the ground or groundwater.

Regardless of this assessment quarterly groundwater monitoring has been undertaken at the site from boreholes BH201, BH401 and BH402 during the life of the permit.

During the permit there has been one incident which could have caused contamination of the ground, associated with the failure of a process sewer line. The site proposed to undertake 3-monthly groundwater monitoring within the area and to commission a CCTV survey. The inspecting officer agreed that only groundwater monitoring was required and a CCTV was not necessary.

The Site Surrender Report provides a summary table of the quarterly groundwater monitoring undertaken at the site since 2007. Laboratory data sheets have been provided in response to a Schedule 5. This data indicates that the site has not significantly impacted the groundwater. There are a couple of occasions where acetone has been identified above the laboratory limit of detection (LOD) in the groundwater but the levels are still low (just above the LOD).

Soil samples have been collected for the site but these are not within the area of concern (around the interceptor, scrubber and associated pipelines) and have not included acetone in the analytical suite. Consequently, these do not provide any evidence as to whether the activities undertaken at the site have impacted the ground.

Given the frequency of the "reasonable possibility" of pollution activities identified in the ASR (i.e. that shut down occurs approximately every two years), that only one spill (occurring in 2008) may have caused an impact to the land, that improvements were made to the area identified as having a "reasonable possibility" of pollution by 2009 and the groundwater monitoring data I conclude that the land and waters at the site are in a satisfactory state.

10.0 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: see Section 10.0 of the Site Surrender Report which states:

"In summary:

- the permitted activities have stopped;
- decommissioning is complete, and the pollution risk has been removed; and
- the land is in a satisfactory state".

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	✓
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: Suzanne Southern 3rd November 2015.	