

Application SCR evaluation template

Name of activity, address and NGR	<p><i>Viridor Waste (Somerset) Limited</i> <i>Dimmer hazardous waste transfer station</i> <i>Dimmer</i> <i>Castle Cray</i> <i>Somerset</i> <i>BA7 7NR</i></p> <p><i>National Grid Reference ST 613 313</i></p>
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Document reference SCRs	<p><i>EPR/LP3031SE/A001</i> <i>EPR/LP3031SE/S005</i></p>
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Date and version of SCRs and Supporting Information	<p><i>Surrender Site Condition Report, June 2015</i> <i>Surrender Report, June 2015</i></p>
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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

Accepted at permit determination.

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?

Accepted at permit determination.

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 implementation of the PPC Regulations an application for an Environmental Permit was made by Wyvern Waste Services Ltd, which was duly made on 3 October 2005. The application was for the 'Disposal of hazardous waste in a facility with a capacity of more than 10 tonnes per day', which was a Schedule 1 Section 5.3 Part A (1) a) listed activity under the PPC Regulations.

The Transfer Station is located in and forms part of a larger waste management facility comprising landfill, composting, hazardous waste storage and a Civic Amenity Site, all operated by Viridor Waste (Somerset) Limited. These individual facilities operate under separate Environmental Permits.

The Transfer Station is now closed but remains regulated by two Environmental Permits, reference LP3031SE for hazardous wastes and WML/26026 for non-hazardous wastes. The Transfer Station activities ceased in November 2013 and the

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)
<i>facility has been decommissioned and the site cleared of all residues from its former use as a Hazardous Waste Transfer Station.</i>	

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.
<i>Accepted at permit determination.</i>

3.0(b) Will the pollution prevention measures protect land and groundwater? (Conceptual model)	
Are the activities likely to result in pollution of land?	
<i>Accepted at permit determination.</i>	
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?	<i>Accepted at permit determination.</i>

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
<i>Accepted at permit determination.</i>	

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	
<p><i>Following the implementation of the PPC Regulations an application for an Environmental Permit was made by Wyvern Waste Services Ltd, which was duly made on 3 October 2005. The application was for the 'Disposal of hazardous waste in a facility with a capacity of more than 10 tonnes per day', which was a Schedule 1 Section 5.3 Part A (1) a) listed activity under the PPC Regulations.</i></p> <p><i>Environmental Permit LP3031SE was issued to Viridor Waste (Somerset) Ltd (the company name having been changed when Viridor acquired Wyvern Waste Services) on 29 June 2006. This permit covered the transfer of hazardous waste whilst the transfer of non-hazardous waste continued under permit WML/26026. The separate permits remained as a function of the implementation of the IPPC Directive at that point. Under more recent practice the EA would have consolidated these permits under a single permit.</i></p> <p><i>There has been no change in the nature of activities since the waste management licence was issued in August 2000. No 'dangerous substances' have been stored/produced by the permitted activities that were not identified in the Application Site Condition Report or listed in the Environmental Permit as permitted waste types.</i></p> <p><i>An application to vary permit LP3031SE was made to 'Increase maximum throughput of hazardous waste from 500 tonnes per year to 1,000 tonnes per year'. The permit variation was granted on 9 March 2009, reference LP3031SE/V002.</i></p> <p><i>The Environment Agency initiated a variation to the permit to reflect the implementation of the Industrial Emissions Directive into Schedule 1 of the Environmental Permitting Regulations 2010. The permit, reference LP3031SE/V003, was issued on 13 March 2014.</i></p> <p><i>There have been no changes to the permit boundary since the permit was issued.</i></p>	

5.0 Measures taken to protect land

(Pathway)

Has the applicant provided evidence from records collated during the lifetime of the permit, to show that the pollution prevention measures have worked?

The Transfer Station is located within a fenced and gated compound. When the site was operational it included a reception building, hazardous waste stores, drainage and engineered containment. The layout of the facility is shown on Drawing ST14580-005. The operational site was sub-divided into four zones, as follows:

- Zone 1 is the chemical drum building which contained mainly paints and solvents;*
- Zone 2 included two hazardous waste storage containers;*
- Zone 3 was the battery store;*
- Zone 4 provided external storage area for empty containers and pallets.*

The site interceptor was emptied and improvements were made to site drainage and kerbing, to prevent contaminated water running into the site from the access road.

Activities undertaken at the Transfer Station were conducted for the most part in accordance with the permit conditions and in accordance with Viridor's written Management Systems to prevent the risk of leaks, spills and other pollution incidents.

The Transfer Station activities have been conducted within a fully engineered containment area with no recorded incidents of pollution beyond the site perimeter.

In external areas of the site the impermeable surface was constructed to direct the flow of surface run-off towards a number of gullies around the site and into the drainage system. The drainage system included a catch pit, which removed suspended solids, and a by-pass separator/interceptor, which removed hydrocarbon pollutants and silt prior to discharge into an adjacent ditch, under the appropriate consent.

To prevent pollution to land the site was designed and constructed with an engineered concrete and asphalt impermeable surface, with kerbing around most of the perimeter to prevent any run-off from the impermeable surface, other than via the purpose built drainage system. The fully contained drainage system, was designed to capture all surface run-off generated within the operational area.

The waste storage and bulking building and the drum wash building each had their own fully contained drainage system, which prevented the ingress of rain water into the building and directed any liquid spillages towards the rear of the building.

Any internal drainage collected at the lowest point in the internal containment system at the back of the buildings, where there was a lockable discharge valve. This valve was kept locked closed throughout the operation of the site and any liquid collected inside the buildings would be pumped out by tanker for disposal at an appropriately permitted site.

The drainage system was subject to monthly monitoring, with more in depth inspections on a quarterly basis. Monitoring of emissions into the ditch was undertaken routinely by staff and by a third party. Due to the maintenance of the impermeable pavement and the sealed drainage system any pathways for pollution of soils, surface water or groundwater were effectively sealed.

6.0 Pollution incidents that may have impacted on land and their remediation

(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)?

Since the date of the original Site Condition Report there have been no recorded pollution incidents within the area of land to be surrendered either as a result of the activities undertaken at the site or otherwise.

Activities undertaken at the Transfer Station were conducted for the most part in accordance with the permit conditions and in accordance with Viridor's written Management Systems to prevent the risk of leaks, spills and other pollution incidents.

A review of the site inspection forms reveal that three minor spillages were recorded in 2002. These led to staining of the impermeable pavement but there is nothing to suggest that pollutants leached out of the site. The site inspection records show that absorbents were applied to clean up these spillages and prevent them causing pollution.

Other minor breaches in the period 2008 to 2010 included one incident of washing of drums outside the building, minor leakage from a container and an incident where two crates holding containers full of liquid were stored external to the building, but within the impermeable surface area of the facility. There is no suggestion that any of these incidents led to pollution of the environment. Further staff training was undertaken to ensure that there was no repeat non-compliance.

Water from the surface water discharge point (DM006SW) was monitored on a regular basis. Over the subsistence of the permit there were a number of minor breaches where suspended solids, ammoniacal nitrogen or COD were slightly elevated above the trigger levels. Due to the nature of the wastes stored on site these levels were unlikely to have been attributable to the transfer station. The presence of ammoniacal nitrogen suggests the presence of degradable wastes and it is possible that the discharge was impacted by an off-site source.

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?

The site is adjacent to Dimmer Landfill Phase 1. Whilst the site does not have gas monitoring boreholes, as they are not required, perimeter gas monitoring boreholes are in place at the adjacent landfill, and BH17 and BH18 are situated close to the site. During the period from January 2005 to the present, no methane concentrations above 1.0% have been recorded at these boreholes.

The site has one sampling point for surface water drainage, DM006SW. Historically this has been dry during monitoring attempts, however when a sample has been obtained water quality has been of good standard and compliant with the permit conditions. There have been very occasional breaches of limits for ammoniacal nitrogen, COD and suspended solids as described in section 3 above.

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

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?

The Transfer Station activities ceased in November 2013 and the facility has been decommissioned. The site has been cleared of all residues from its former use as a Hazardous Waste Transfer Station. The photographic evidence, contained in Appendix 1 of the application EPR/LP3031SE/S005, provides evidence of the current condition of the permitted site.

The area which is included within the surrender has been cleared of all stored wastes. All hardstanding areas, gullies, drains, catchment areas and sumps have been cleared of all remnant surface run-off and appropriately flushed out and cleaned. There are thus no potentially contaminating materials remaining within the surrender area. Accordingly, it does not present any residual risk to the environment.

It has been noted that there is no visual evidence of significant damage to the pollution prevention measures introduced as part of the site activities. For all relevant activities conducted at the site there was no evidence to conclude that land pollution or leaks to the land had occurred during the life of the facility. The site appears clean and tidy with no visual or olfactory indications of contamination.

9.0 Reference data and remediation (where relevant)

Has the applicant provided details of any surrender reference data that they have collected and any remediation that they have undertaken?

GWHCL comments here are as for the non-hazardous part of the site (EAWML 26026).

Baseline sampling of the soil at the facility was carried out in March 2000, and then sampling was done again in May 2015. Concentrations of metals (arsenic, cadmium, chromium, copper, nickel lead and zinc) along with TPH have all apparently increased during this time (Wardell Armstrong report Table 1 p10). However, concentrations are still within Soil Guideline Values (SGVs) for commercial end use, and S4UL guideline values. Although there has been an increase in concentrations, this might be explained from varying sampling depth between baseline and surrender. Given the engineered containment measures and their apparent robustness, we are inclined to accept this explanation, along what is likely to be low risk from this site.

10.0a Statement of site condition

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 site has been completely cleared of all stored wastes. All hardstanding areas, gullies, drains, catchment areas and sumps have been cleared of any remnant surface runoff and appropriately cleaned. The Transfer Station is no longer used by the operator and no risk to the environment remains.

Due to the high standard of engineered containment that was maintained on site it is very unlikely that materials can have leached into the soil. There were no major spillages or other incidents that may have caused pollution during the subsistence of the permit. Any minor spillages were cleared using appropriate absorbent materials and the waste was disposed of at an appropriately permitted site.

It is considered that the necessary measures have been taken to avoid pollution and the site has been returned to a satisfactory state in accordance with the requirements of Paragraph 14 of Schedule 5 of the Environmental Permitting (England and Wales) Regulations 2010. We the Environment Agency accept the application for surrender.

10.0b Statement of site condition

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 Wardell Armstrong report p11 (ref ST14580/002 June 2015)

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
Date and name of reviewer <i>Ralph Lynch 15 July 2015</i>	