

EAWML 80544

EPR/UP3233FR/S003

Application SCR evaluation template

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

Name of activity, address and NGR	London Waste Ltd Edmonton Clinical Waste Treatment Centre, EcoPark, Advent Way, Edmonton, London, N18 3AG TQ35709271
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Document reference of application SCR	Site Condition Report for WML 80544 UP3233FR March 2016
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Date and version of application SCR	March 2016
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1.0 Site details To be completed by NPS (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)
Site plans showing site layout, drainage, surfacing, receptors, sources of emissions/releases and monitoring points	Check plans provided by the applicant (see also Part A of the application form). If information is missing then request further dated plans be supplied.

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?	Response (Specify what information is needed from the applicant, if any)
a) Environmental setting including geology, hydrogeology and surface waters b) Pollution history including: <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 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?	Polkacrest originally applied for IPC authorisation then an IPPC permit which was transferred to London Waste in 2011. However, I think there was a waste management licence prior to 2008 so the provisions in RGN 9 Appendix A apply. The site was constructed in 1969 and operational from 1970. No site condition reports would have been available at that time.

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?	Response (Specify what information is needed from the applicant, if any)
a) Permitted activities b) Non-permitted activities undertaken at the site	Review summary provided by the applicant and confirm it does give a brief outline of the permitted activities, drawn from other parts of the application and cross-referenced to site plans.

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.

Review summary provided by the applicant under H1 and confirm if it is an appropriate environmental risk assessment for the site. Specify what information is needed from the applicant, if any

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?
(Information on pollution prevention measures will be in another part of the application – Part B)

If Yes, specify what additional controls/checks may be necessary

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?
(If the answer is no, briefly explain how you arrive at your conclusion)

(This may consist of improved infrastructure, targeted surveillance monitoring by the operator and/or inspections by compliance teams)

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

Information is missing- the following information must be obtained from the applicant.
(Advise the permitting team on what additional information is needed)

Pollution of land and water is unlikely; or
(Pollution prevention measures just need to be reviewed during operation of the site)

Pollution of land and water is likely
(Advise the permitting team on what additional controls/checks may be necessary)

Historical contamination is present- advise operator that collection of background data may be appropriate

Date and name of reviewer

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)
a) Activity boundaries b) Permitted activities c) "Dangerous substances" used or produced	This information will be needed to surrender the permit and should therefore cover all of the land on which any of the activities covered by the permit may take place.

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?	If no, specify why

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)?	Have all pollution sources associated with the incident been investigated and remediated such that they will not lead to pollution after permit surrender e.g. pipe work containing raw materials?

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?	If no, specify why

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

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.

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.

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.

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?

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

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>Site decommissioned in 2011 then operated as a clinical waste transfer facility until 2015. The DEFRA core guidance states: Satisfactory state 7.29 <i>The regulator must ensure that the necessary measures have been taken to return the site of the regulated facility to a satisfactory state. This can only be achieved if operators aim to restore a site to the condition it was in before the facility was put into operation.</i></p> <p>7.30 <i>This may be significantly stricter than the 'suitable for use' test of the contaminated land regime in Part 2A of the EPA 1990 and similar controls on redevelopment. While 'suitable for use' is appropriate for pre-existing contamination, it is not the right test for the preventive environmental permitting regime. When applying to surrender a permit, applicants are advised to consider whether they might be required to carry out remediation under Part 2A and if so whether it would be more cost effective to undertake operations for both purposes at the same time.</i></p> <p>7.31 <i>Other than in exceptional circumstances operators should remove any contamination and return the site to the original condition. However, where an operator can robustly demonstrate that is unsustainable or not practical to do this, then the contamination should be removed as far as practicable.</i></p> <p>7.32 <i>The return of the site of the regulated facility to a satisfactory state should include:</i></p> <ul style="list-style-type: none"> • <i>the removal of any residual waste deposits (though clearly not for landfills or mining waste operations for the permanent deposit of extractive waste)</i> • <i>removing as far as is practical any contamination to return the site to the original condition, and</i> • <i>where removal is not practical - treating or immobilising contamination remedying any harm the contamination may have caused, and mitigating the effects of any harm.</i> <p>It would appear that the applicant has <i>removed any residual waste deposits and decommissioned the site.</i> (Documented in the site decommissioning report ref LWL/00104)</p> <p>The clinical waste permit boundary sits within the wider London Waste Ecopark which has been subject to site investigation (some of which have been included in the surrender application documents). The recent CCTV survey results indicates that the drainage system may have been impacted and some leakage to the underlying Secondary (A) aquifer may have occurred over time.</p>
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Surrender SCR decision summary To be completed by GWCL officers and returned to NPS	Tick relevant decision
<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>X</p> <p>Although the site has not been reinstated back to its original condition before the facility was put into operation, based on the information provided - the soil and groundwater data would probably not warrant actions under Part 2A in its current state, however should the conceptual model change (e.g. proposed change in land use, infrastructure, deterioration of current infrastructure & concrete hardstanding) then remediation may be required at a future date.</p> <p>E.g. If a planning application was submitted for the site, based on the information provided I would recommend the use of the land affecting by</p>

	contamination conditions to be used on the planning consent. .
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	Theresa Cory 04/08/2016

Related documents

Links

- [676_06 Environmental Permitting Regulations: Site condition reports](#)
- [H1 Environmental risk assessment for permits](#)
- [H5 Guidance](#)
- [H5 Site condition report template](#)
- [Regulatory guidance note 9 : Demonstrating land and groundwater are protected to assist the surrender of an environmental permit](#)