

Application SCR evaluation template

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

Name of activity, address and NGR	Aylesford Newsprint Papermill Newsprint House Bellingham Way Aylesford Kent ME20 7DL
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Document reference of application SCR	Ref: JER6554
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Date and version of application SCR	Revision 8, May 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	Plans adequate

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?	Information provided

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	Information provided

3.0(a) Environmental Risk AssessmentTo 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.

Information provided

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?

No

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

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

See below

Date and name of reviewer Kirsty White 28 July 2016

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	None

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

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)?	Yes

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?	✓

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?	Yes

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?	Yes

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.

Email from site inspector and groundwater/contaminated land team:

Previously the EA provided comments on the Site Condition Report produced by RPS dated December 2015. Our comments were as follows:

“We agree that the rigorous environmental management and compliance procedures have reduced the likelihood of contamination during the lifetime of the permit. Following a site visit, we are also encouraged that the site closure was undertaken in accordance with the relevant documents, and that actions and procedures written into the permit were met.

A low risk surrender is appropriate where the risk to the environment is sufficiently low that an intrusive site survey or monitoring data in the surrender site condition report is not required. Given the high sensitivity of the site (Source Protection Zone 1 for abstractions on and around the site) and a 24 hour operational period we believe an intrusive investigation is necessary to accurately compare the site to the initial site condition report. This should comprise a shallow investigation in the areas of concern identified in the Initial Site Condition Report, for direct comparison.

Despite the good operational practice on site, unidentified leaks may still have occurred from buried drainage pipes, sumps or tanks for example. We therefore think an investigation to quantify the condition of the site is justified, and also in line with Industrial Emissions Directive reporting requirements.”

Following these comments and a meeting between the EA and RPS, the further investigations described above were undertaken and are outlined in the Ground Investigation Report for this site produced by RPS, dated April 2016. The document reported analysis of shallows soils and groundwater samples for various determinants such that a comparison to the initial site condition report could be made. Concentrations of potential contaminants in soils were found to be generally low and comparable to the initial report. Similar determinants were found in low concentrations in groundwater, however some dissolved Total Petroleum Hydrocarbons (TPH) was identified in water samples taken from exploratory hole location WED6.

In relation to the permitted activities we generally agree with the findings of the report and, given the comprehensive records of compliance procedures and groundwater monitoring outlined in the SPMP, we would have no objection to the surrender of this permit. It should be noted that the documents submitted in support of this surrender do not negate the requirement for further investigations through any future planning application on this site, which may need to reassess the sources of the TPH in WED6, as well as other historic contaminant sources at this site.

We will support the low risk surrender, and you are welcome to include this email as supporting information when you submit your application.

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 – Ground Investigation Report submitted, dated April 2016.

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

01/08/2016
Tommy
Lowden