

Application SCR evaluation template

Name of activity, address and NGR	<i>E.ON UK CHP Limited Stoke CHP Plant Campbell Road Stoke-on-Trent Staffordshire ST4 4EY</i>
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Document reference of application SCR	<i>Application Site Report and initial permit application, reference EPR/BJ4868; dated 14 June 2001</i>
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Supporting documents, date and version	<i>Covering Letter - E.ON-UK-LET-Stoke Permit BJ4868IW Surrender Application EPR/BJ4868IW/S003 - Application forms A, E2, F1 OPRA spreadsheet EON-UK-Stoke CHP: Site Condition Report; Permit BJ4868IW Surrender Appendices 1-12 (as listed below)</i>
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- *Appendix 1: Stoke CHP: Assessment of Contaminated Land Potential*
- *Appendix 2: Permit Application BJ4868 for the Stoke CHP Plant: Part IV – Michelin Site Report*
- *Appendix 3: Record of environmental notifications to the Environment Agency during the operation of the Stoke CHP plant*
- *Appendix 4: Fuel oil collection note*
- *Appendix 5: Gas oil tanks cleaning effluent consignment note*
- *Appendix 6: Stoke CHP gas oil tanks decommissioning report*
- *Appendix 7: Stoke CHP survey of secondary containment 2011*
- *Appendix 8: Annual bund inspections list for Stoke CHP plant*
- *Appendix 9: Completed example daily and weekly site inspection check sheet*
- *Appendix 10: Stoke Partial Closure Project – Status of Decommissioned Plant & Apparatus*
- *Appendix 11: Aspects and Impacts Register 2013 (not included in hard copy).*
- *Appendix 12: Stoke CHP plant “Environmentally Critical Plant Review” (not included in hard copy)*

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

Provided as part of the application site report submitted in support of environmental permit application EPR/BJ4868; accepted and determined on 14 June 2001

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?

Provided as part of the application EPR/BJ4868; accepted and determined on 14 June 2001

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	
<i>The site was permitted under the following Scheduled Activity; Burning fuel in an appliance with a rated thermal input in excess of 50MW Schedule 1 Activity- Chapter 1, Section 1.1, Part A(1)(a)</i>	
Associated activities: - Operation of a water purification plant - Water discharge to foul sewer - Water discharge to controlled water	

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>Provided as part of the application EPR/BJ4868; accepted and determined on 14 June 2001.</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>No. Justification was provided and assessment undertaken as part of the application EPR/BJ4868 review; accepted and determined on 14 June 2001</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>Yes. Justification was provided and assessed as part of the application EPR/BJ4868 review; accepted and determined on 14 June 2001</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
Date and name of reviewer: <u>14 June 2001</u>	<i>D. G. Othen</i> D Othen

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	
None on record.	

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?
<p><i>The plant had an ISO 14001 Environmental Management System (EMS) in place. This EMS was regularly reviewed and audited to ensure continuous improvement in environmental management. The measures put in place at the installation to protect land and groundwater were managed and reviewed through the EMS to ensure that they remained in place and relevant.</i></p> <p><i>The applicant provided the following information in support of their application for surrender, as evidence of the effective use of the pollution prevention measures on site during operation of the site.</i></p> <ul style="list-style-type: none">• <i>Appendix 3: Record of environmental notifications to the Environment Agency during the operation of the Stoke CHP plant</i>• <i>Appendix 7: Stoke CHP survey of secondary containment 2011</i>• <i>Appendix 8: Annual bund inspections list for Stoke CHP plant</i>• <i>Appendix 9: Completed example daily and weekly site inspection check sheet</i>

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)?
<p><i>There were no environmental events identified during the operation of the CHP site that resulted in the release of harmful substances and caused harm to land or groundwater.</i></p> <p><i>The applicant provided the following information in support of their application for surrender:</i></p> <ul style="list-style-type: none">• <i>Appendix 3: Record of environmental notifications to the Environment Agency during the operation of the Stoke CHP plant</i>

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?

Not applicable.

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 site has been reduced in size in terms of its thermal input to meet customer requirements. This reduction in size has reduced the total thermal input to below 50MW. The remaining plant which comprises two auxiliary boilers (No. 1 & 2), water treatment plant and associated ancillary equipment which will remain in operation to meet the steam demand of the adjacent factory. The total thermal input of the new configuration will be less than 50MW. The changes to the installation have brought it below the threshold for combustion activities (section 1.1 Part A(1)(a)(i) of Schedule 1, of the Environmental Permitting Regulations), and now falls under Part B (a) (i) to be regulated under the local authority.

As a result of the reduced steam demand from the adjacent factory, the main plant (gas turbine, auxiliary boiler and heat recovery steam generator) at the site has already been decommissioned. The redundant plant will remain on site, separated and isolated from the process, until the full site is decommissioned.

The following plant has been decommissioned:

- Gas turbine
- Gas compressor
- Heat Recovery Steam Generator (HRSG) and associated chemical dosing equipment
- Two (of four) transformers (at the southern edge of the site)
- Steam Turbine
- 2 x 500,000 litre reserve gas-oil tanks (within bund)

A report detailing the decommissioning undertaken and state of plant was produced following decommissioning of plant and was submitted as Appendix 6 and Appendix 10 under surrender application EPR/BJ4868IW/S003.

Hazardous substances from redundant/decommissioned plant were either used up or have been removed and reports on oil removal and waste washings removal were submitted as Appendix 4 and 5. Existing secondary containment systems for redundant plant, including the two decommissioned oil-containing transformers will remain in place and the site interceptor pit and aqua sentry will remain operational.

The areas and processes on site that remain active will continue to operator under the existing environmental management scheme, including the checks and control procedures. The decommissioning works have reduced the on-site source term by reducing the volume of potential contaminants on site. The risk was initially considered to be low, which was accepted at the time of the permit determination, and as such the reduction in volumes of chemicals and substances being stored on site has also reduced the risk to receptor.

All sources of pollution risk, relevant to the application made by the operator, have been removed. The site remains operational but falls outside of the scope of regulation by the Environment Agency for the reasons identified above.

The Environment Agency Regulatory Inspector for the site attended a tour of the installation to view the decommissioned plant (18th July 2014).

9.0 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?

Reference data was not collected as it was deemed not necessary based upon the protection measures employed at the Stoke CHP plant. An application site report (ASR) was submitted as part of the permit application. The ASR was based upon a detailed review of the historic data available for and the protection measures in place at Stoke. Based upon this assessment it was concluded that there was little likelihood that there would be land pollution or incidents that would lead to land pollution from the activities carried out at the Stoke CHP plant.

Following the issue of the permit, an inspection regime was developed by the Operator setting out a programme that would be followed to ensure that all tanks, vessels and associated bunds would be inspected and maintained to prevent any potential pollution of land during the life of the permit. All inspections have been carried out in line with the plan and have been part of the sites preventative maintenance programme, daily & weekly inspections carried out by plant operators. A review of these records has not identified any areas of concern and any failing of control measures that could have resulted in pollution to land.

The site, Stoke CHP, has operated without significant environmental incident that could cause contamination or environmental harm to ground or groundwater since the issue of the original permit in 2001.

Decommissioning reports, partial closure report, inspection and maintenance records, photographic evidence and survey reports were all submitted in support of the application for surrender to prove that the site had been returned in a satisfactory state. The Environment Agency has reviewed the full application and supporting documents and accepts the Operator's claim that the land has been returned in a satisfactory state.

Surrender SCR decision summary	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	Yes.
Date and name of reviewer - 20/04/2015	<i>M J Derbyshire</i> M J Derbyshire