

## Application SCR evaluation template

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| Name of activity, address and NGR | BOCM PAULS Ltd<br>Cranswick Animal Feed Mill<br>Cranswick Industrial Estate<br>Beverley Road<br>Cranswick<br>North Humberside<br>YO25 9PF<br>NGR TA 0189 5171 |
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| Document reference of application SCR | Cranswick Mill: PPC Permit Application v1<br>Document Reference: AN0550001, February 2005 |
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| Date and version of application SCR | Site Condition Report, document reference CWK2, September 2014   |
| Supporting Documents & references   | Accident Management Plan (AMP), September 2014 (ref: CWK 7)<br>Site Closure Report, September 2014 (ref: CWK3)<br>Site Protection and Monitoring Programme, September 2014 (ref: CWK6)<br>Evidence of transfers (ref: CWK8)<br>Waste transfer notes (ref: CWK9)<br>Site Photographs (ref: CWK11)<br>Site Photographs (ref: CWK12)<br>Soil sampling – soak away (ref: CWK13)<br>Site drainage details (ref: CWK14)<br>Additional Environmental Assessment Report (ref: SLR Ref:406.05295.00001) February 2015 |

### 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

Plans were provided and accepted at the permit determination. These included a location plan, site layout plan and drainage details in addition to confirmation of infrastructure, receptors, emission points and storage areas. These were accepted on 03/11/2005.

Plans were provided as part of the surrender application submitted to the Environment Agency and duly made on 07/10/2014.

### 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

## 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?**

verification reports (where available)  
d) Has the applicant chosen to collect baseline reference data?

All of the above criteria were met and the relevant information provided within Cranswick Mill: PPC Permit Application v1 Document Reference: AN0550001, February 2005. This documentation was reviewed and accepted at permit determination on 03/11/2005.

The decision document stated "Adequate information to enable the Environment Agency to determine the Application has been provided in the Application Site Report.

To ensure the continued effectiveness of pollution prevention measures to protect the land the Operator is required to implement and operate under a Site Protection and Monitoring Programme."

## 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

The site has been regulated under:

- Section 6.8 Part A(1)(d)(ii) – "Treating and processing materials intended for the production of food products from vegetable raw materials at a plant with a finished product production capacity of more than 300 tonnes per day (average value on a quarterly basis)";

and the following directly associated activities:

- Raw material storage and handling
- Control and abatement systems for emissions to air
- Cleaning activities
- Utilities and services
- Storage and handling of waste material

The activities comprise a single installation because all unlisted activities are directly associated with, and technically connected to, the single scheduled activity in a processing system for the manufacture of compound animal feeds. The directly associated activities have the potential to cause environmental impacts.

The stationary technical unit and its directly-associated activities described above together constitute the Installation.

### **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.*

*The application site condition report and risk assessment submitted in the original permit application demonstrated that most risks to air, land and groundwater have been mitigated/minimised such that there is little likelihood of pollution.*

*The adequacy of pollution prevention measures was previously assessed using H7 technical guidance. The assessment concluded that due to the presence of secondary and tertiary containment most scenarios gave rise to little likelihood of pollution occurring. However, there was a reasonable possibility of future land pollution occurring from the following:*

- Delivery, storage and use of soya oil*
- Delivery of gas oil for creep feed mill boilers.*

*The Environment Agency reviewed the operator's assessment of the environmental risk from the facility deemed it satisfactory. Additionally the Environment Agency set an improvement programme which included the implementation of a design site protection monitoring programme (SPMP). This was accepted at permit determination, dated 17/05/2013.*

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

*(Conceptual model)*

*Are the activities likely to result in pollution of land?*

*No. At the time of the original application, for a new bespoke environmental permit, we (the Environment Agency) reviewed all available information including the Application Site Report (ASR), summary of Environment Management System (EMS) and site plans and drawings.*

*The facility has been sited with appropriate containment measures to ensure prevention of leaks, accidents and incidents including the management and detection which would be identified, handled and managed appropriately. The drainage system for separation of dirty water from clean surface water provided reassurance that potentially contaminated water will be contained within impermeable drainage system and shall not infiltrate into ground.*

*We are satisfied that the operator has demonstrated that the proposed operation of the site will protect the land and groundwater beneath and surrounding the site.*

*To ensure the continued effectiveness of pollution prevention measures to protect the land the Operator is required to implement and operate under a Site Protection and Monitoring Programme, (Conditions 2.1.2 and 2.10.9), the design of which must be reported to the Agency within two months from the date of permit issue, Condition 4.1.7.*

*The application identifies that there is a "reasonable possibility" of future pollution of the land and therefore we the Environment Agency place a requirement for reference conditions to be established unless the operator can implement further provision on site for the prevention of pollution.*

*We consider that in reaching the decision to issue an environmental permit we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environment protection is provided.*

*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 site complied with BAT.*

*Where there was reasonable possibility of land pollution such as the soya oil and gas oil tank, in agreement with the EA the planned maintenance schedule and monitoring procedures were put in place to manage the remaining risks by:*

- 1. Supervised delivery and offload of relevant substances*
- 2. Four weekly inspections of the storage tanks, hardstanding, pipes, pumps, meters and valves.*

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|  | <p>3. <i>Spill kits positioned and maintained at fill points</i></p> <p><i>These actions removed the requirement to collect reference data.</i></p> |
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| <b>Application SCR decision summary</b>   | <b>Tick relevant decision</b> |
|---|-------------------------------|
| <i>Sufficient information has been supplied to describe the condition of the site at permit issue</i> | Yes                           |
| <i>Pollution of land and water is unlikely; or</i>  | Yes                           |
| <p><i>Date and name of reviewer:</i><br/> <i>M Derbyshire (NPS) 23/09/2014</i></p>                    | <i>M Derbyshire</i>           |

## Operational phase SCR evaluation template

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

| <b>4.0 Changes to the activities</b><br>(Source)   |  |
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| <b>Have there been any changes to the following during the operation of the site?</b>  | <b>Response</b><br>(Specify what information is needed from the applicant, if any) |
| a) Activity boundaries<br>b) Permitted activities<br>c) "Dangerous substances" used or produced  |  |
| No. A transfer was granted in 2007 for the site, transferring in full the environmental permit from Cranswick Mill Limited to BOCM Pauls Limited. No further changes to the site or operations have been recorded. |  |

  

| <b>5.0 Measures taken to protect land</b><br>(Pathway)   |   |
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| Has the applicant provided evidence from records collated during the lifetime of the permit, to show that the pollution prevention measures have worked? | Yes. The Operator has provided robust evidence demonstrating the active use and maintenance of pollution prevention measures. |

  

| <b>6.0 Pollution incidents that may have impacted on land and their remediation</b><br>(Sources)  |  |
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| 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)? | No environmental incidents have occurred during the lifetime of the permit according to the evidence and records supplied by the Operator. |

  

| <b>7.0 Soil gas and water quality monitoring (where relevant)</b>   |  |
|---|--|
| 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?  |  |
| Baseline data has not be collected or submitted by the applicant as the site has historically been deemed as a low environmental risk with the implementation of the pollution prevention measures and BAT, which was accepted by the Environment Agency at the time of determination (03/11/2005). |  |

## **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?*

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

*The site has now been fully decommissioned (as of September 2014) and ceased operation in 2009.*

*Detail regarding each area inspected is as follows:*

#### Gas Oil Tank / Bund

*The gas oil tank was removed approximately five years ago shortly after the plant closed. The brick bund remains in place. A hole has been drilled into the base of the bund to allow rainwater to drain away freely. The bund was visually inspected. There was no evidence of any spillage outside the bund. There were some small patches of oily residue within the bund, but not at a level which would pose a significant risk to the surrounding environment. Lisa Ward confirmed that there had been no incidents during the life of the permit that could have had an adverse impact on the environment.*

#### Septic Tank

*The site has an underground septic tank that is situated underneath the main car park storing effluent produced from the sites office building, which is still operational. It is important to note that top water from the septic tank used to be pumped to a soak away situated underneath the creep feed mill. This ceased when the site stopped operations. The tank was emptied once a year but this had reduced.*

#### Interceptor

*The site has an interceptor which is situated underneath the entrance road to the site at its northern most point. The interceptor has only ever been used to remove oil suspended within surface water draining from the site. Note - The interceptor was drained and jet washed in September 2014.*

#### Creep Feed Mill

*The floor within the creep mill is made from concrete. The general condition was very good. I didn't notice any cracks that could have acted as pathways for pollutants. The only areas where damage had occurred was around the soya oil tank. The damage observed appeared to have been caused by corrosion but it appeared highly unlikely that the integrity of the concrete had been compromised. Note - The soya oil tank and all ancillary pipe work has been drained and cleaned out. The work was completed in September 2014.*

*The only potential pathways for pollution observed within the creep mill were a number of manholes. Ms Ward explained that one of the manhole covers is situated above the soak away mentioned earlier. The soak away sits at the bottom of a 12 foot deep by 1m wide (approx.) chamber. As part of the surrender, two samples were taken of the sludge situated within the chamber and analysis undertaken. Note - the results of this analysis will be reviewed at a later date and any concerns or requirement for further investigation communicated back to you.*

*The other manholes are believed to sit above surface water drains. Any loss of oil through these would have drained to the sites interceptor thus minimising the risk of any spillage escaping off site.*

Boiler House

*During operation boiler blow down was discharged directly to sewer. As the boiler has now been removed this risk no longer exists.*

Gas Oil Tank

*This was removed from site five years ago when the site closed. No incidents were recorded during the lifetime of the permit.*

Vegetable Fat Tank & Waste Oil Tank

*These were removed from site in September 2014. No incidents were recorded during the lifetime of the permit.*

Molasses Tank

*This tank is still in situ. It was fully decommissioned in September 2014.*

Concrete Bund (surrounding Gas Oil Tank / Veg Fat Tank / Waste Oil Tank / Molasses Tank)

*Part of the bund was removed during the de-commissioning phase. The remaining parts of the bund demonstrated that it was constructed of rendered concrete. There was no evidence that the bund had failed in any way or that any leakage had occurred outside of the bund. The bund itself was surrounded by concrete surface areas. The Operator confirmed that there had been no incidents recorded during the lifetime of the permit. It was apparent that the risk of any polluting matter escaping off site to ground would be minimal if not zero.*

Main Feed Mill

*As with the creep feed mill the entire surface area within the building is concrete. There are a number of pits but these are concrete lined. There was no evidence that any of the concrete had cracked. The Operator again confirmed that there hadn't been any incidents during the life of the permit. Consequently, I believe that the risk posed to the underlying ground would be minimal.*

**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?*

*The applicant submitted an Environmental Assessment report for investigating potential contamination issues arising from the soakaway at the site. Two samples from the soakaway were collected and analysed against Environment Agency's fresh water EQS. The two samples showed elevated concentrations of hydrocarbons especially the sample from the solidified deposits at the base of the soakaway. Site specific information regarding the geology and hydrogeology were not provided and therefore it was not possible to adequately assess the risk to groundwater.*

*The applicant chose not to perform any further investigation at the site, but to completely remove the sludge from the soakaway as this is considered the primary source of contamination. Following the removal of the sludge the applicant collected and analysed additional samples of soil from below the soakaway informing the Environment Agency, in the form of a further environmental assessment report (February 2015), that all potential risks to groundwater- associated with site activities - had been removed and that ground conditions had been are of a satisfactory state following the removal of solidified sludge from the base of the soak away.*

*We, the Environment Agency, have reviewed the environmental assessment report (reference: Additional Environmental Assessment Report (ref: SLR Ref:406.05295.00001) February 2015) for the soakaway at Cranswick farm and agree with its findings. We are satisfied contaminated sludge from the soakaway has been removed, therefore eliminating the source of contamination and reducing the risk to the Chalk aquifer beneath the site. The report states that 99% of the hydrocarbon impact was removed from the affected location demonstrating satisfactory removal of impacted soils and solidified sludge.*

*Sampling from the soils beneath the soakaway showed that some contamination had migrated into clay deposits which overlay the aquifer. However we agree that the remaining contamination does not pose a significant risk to the groundwater as it is protected by 5-6 metres of clay deposits and any sand bands present within the deposits are likely to be discontinuous.*

*The report demonstrates that the risk to groundwater has been satisfactorily removed through the removal of contaminated sludge and soils, therefore we the Environment Agency, accept that the condition of the site has been returned in a satisfactory state.*

**10.0 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?

*Based on the application made by the Operator, for the surrender of environmental permit EPR/XP3832UQ/S003, the Environment Agency is satisfied that the risk of significant pollution to either groundwater, surface water or the underlying geology, potentially caused by the activities undertaken on site during the lifetime of the permit, is minimal and that the site has been returned in a satisfactory state.*

| <b>Surrender SCR decision summary</b><br><i>To be completed by GWCL officers and returned to NPS</i>   | <b>Tick relevant decision</b>                            |
|--|--|
| <i>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</i> | Yes  |
| <i>Date and name of reviewer</i>   | <i>H. Tarnanas</i><br><i>M. Derbyshire</i><br>26/02/2015 |