

Surrender SCR Evaluation Template - Part 1 – NPS Assessment

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?

Firstly it should be noted that whilst the permitted activities have ceased, the site will continue to operate, using some of the extant plant and equipment, which will remain in situ. The operator has provided a list of plant which has been decommissioned and the pollution risks removed as per the 'Decommissioning Plan' provided as a RFI response on 01/11/2017.

According to records held by Exol Lubricants, there have been no reported significant spillages, releases of waste oils or other process substances at the site for the duration of the permit as per Section 3.2 of the Site Closure Report.

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.

Yes. Reference data has been collected. Please see SPMP provided as supporting information for the surrender application.

10.0a 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, a statement has been included. Please see Section 5.0 of Site Closure Report. In conclusion: With regards to closure of the site, as outlined in the Site Closure Plan, as the contamination that has been identified is not considered to have been caused as a result of Exol Lubricant's operations at the site throughout the duration of the PPC permit (2007 – 2017) and instead is as a result of historical activities, OHES do not consider that further assessment and or remediation works are required to return the site to its pre-permit condition prior to surrender of the permit.

10.0b 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?

Please see GWCL response below.

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

See below

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:

See below

Date and name of reviewer

See below

Application SCR evaluation template

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

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|-----------------------------------|---|
| Name of activity, address and NGR | Exol Lubricants (Rotherham) Limited, Northfield Road, Rotherham 442800, 3983500 |
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|---------------------------------------|-----------------|
| Document reference of application SCR | R001 SG-17.2312 |
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|-------------------------------------|---|
| Date and version of application SCR | Groundwater Monitoring – Site Closure Report, August 2017 |
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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 | See above. |

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| 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? | The ASR and SMMP reports show that the site has been heavily contaminated by oil free product. Product was present before the permit was issued. Baseline reference data has been collected. |

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| 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 | See above. |

| 3.0(a) Environmental Risk Assessment To be completed by NPS officers (Source) | |
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| 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. | See above. |

| 3.0(b) Will the pollution prevention measures protect land and groundwater? To be completed by EM/PPC officers (Conceptual model) | |
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| Are the activities likely to result in pollution of land? | See above. |
| 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? | See above. |

| Application SCR decision summary To be completed by GWCL officer and returned to NPS | Tick relevant decision |
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| Sufficient information has been supplied to describe the condition of the site at permit issue; or | <input checked="" type="checkbox"/> |
| Information is missing- the following information must be obtained from the applicant. | |
| Pollution of land and water is unlikely; or | <input checked="" type="checkbox"/> |
| Pollution of land and water is likely | |
| Historical contamination is present- advise operator that collection of background data may be appropriate | <input checked="" type="checkbox"/> |
| Date and name of reviewer | Edward Wrathmell 04/1/18 |

Operational phase SCR evaluation template – Completed by PPC/GWCL

(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 | |
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| 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 | a) no change to installation boundary b) no change other than addition of 19 02 08* - liquid combustible wastes containing dangerous substances, limited to waste electrical insulating oils that have been partially treated elsewhere c) no change |
| 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 – testing, inspection and maintenance programme for pollution prevention infrastructure on site. |
| 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)? | There have been no significant spillages or pollution incidents on site, other than the occasional leak from tankers which have all been cleaned up in situ. |
| 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? | Regular monitoring and SPMP reports have been produced |

Surrender SCR Evaluation Template – Part 2 – GWCL/PPC assessment


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 | |
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| 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 have ceased. No evidence of pollution risks on site. |

| 10.0 Statement of site condition | |
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| 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 – most equipment decommissioned and removed from site. Equipment that has been kept has had ancillary equipment removed until it can be permanently removed from site, so it cannot physically be operated. |

| 9.0 Reference data and remediation (where relevant) | |
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| 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. | This will be confirmed by the Regulatory Officer during the final site inspection. The baseline pollution at the site is gross so without information about spills we cannot use monitoring data to prove impacts. *Confirm if any spills/accidents on site through duration of the permit. CM 18/01/18 – following final site inspection I can confirm there have been no significant spillages or pollution incidents on site, other than the occasional leak from tankers which have all been cleaned up in situ. |

| 10.0 Statement of site condition | |
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| 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? | See Comment in Section 9.0 |

| Surrender SCR decision summary | |
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| To be completed by GWCL officers and returned to NPS | |
| 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: Results of final site inspection – if no evidence of further contamination is found then we can accept that the permit can be surrendered – confirmed by Claire Mitchell 18/01/2018. |  |
| Date and name of reviewer: | Edward Wrathmell 4/1/18 |

