

Permit Application Site Condition Report Evaluation Template (SECRET)

Name of activities, addresses and NGRs	<p>Installation facility: Tradebe Dinnington Solvent Recovery.</p> <p>Waste facility: Dinnington Hazardous Waste Transfer Station.</p> <p>Unit 19, Todwick Road Industrial Estate, Bookers Way, Sheffield, South Yorkshire, S25 3SH.</p> <p>NGR of the approximate centre of the installation facility is SK 508 865 and the waste facility SK 508 853.</p> <p>Installations Permit Reference EPR/GP3638MX/S009.</p> <p>Waste Licence Reference EPR/LP3595VA/S003 (EAWML 100309).</p>
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Document reference, date and version of application SCR	<p>'Baseline Condition Survey Dinnington Waste Management Centre Bookers Way Sheffield on behalf of Tradebe Management Limited' ref: A0302/R1/V1.0 dated December 2013, Earth Environmental and Geotechnical.</p> <p>'Vendor Due Diligence, Safetykleen, Dinnington' final issue No.1 44320056/MARP00003 dated December 2006, URS.</p>
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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.

The Operator provided a Site Condition Report (SCR) at the time the original application was made including a baseline intrusive report. Drawings were also provided by the Operator and reviewed and accepted by the Environment Agency at the application stage. The Due Diligence report undertaken in 2006 by URS was for the sale of the former solvent recovery operations by Safety-Kleen to Advanced Waste Solutions (part of the Tradebe Group).

2.0 Condition of the land at permit issue

Has the applicant provided the following information as required by the application SCR template?

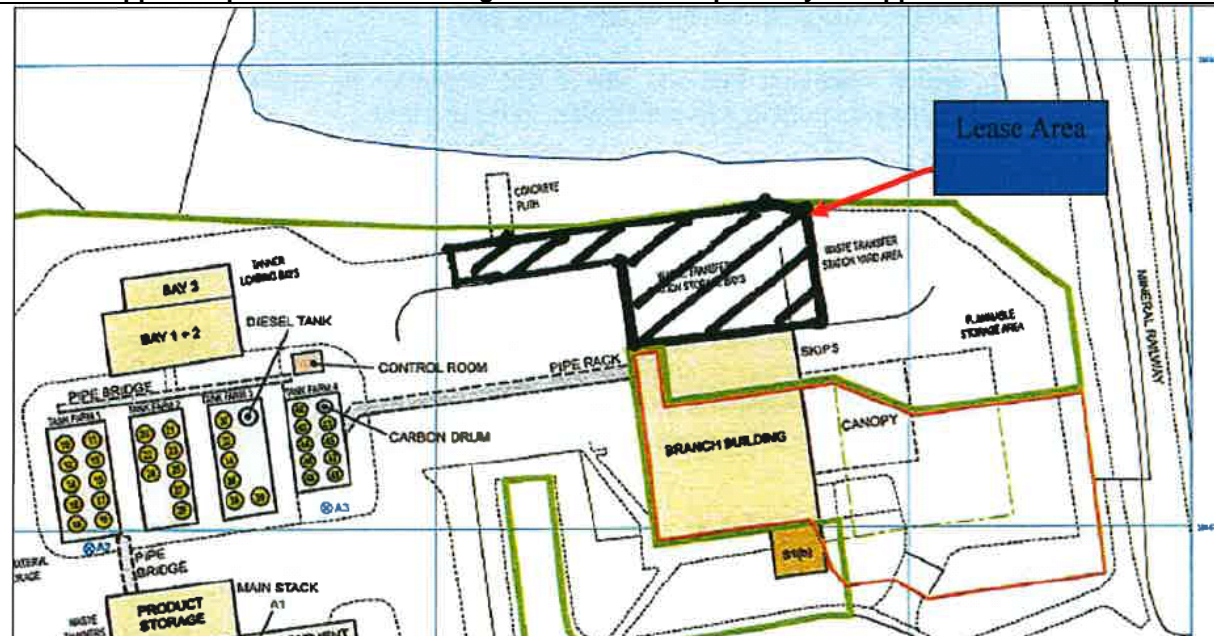
- a) Environmental setting including geology, hydrogeology and surface waters.
- b) Pollution history including:
 - pollution incidents that may have affected land
 - historical land-uses and associated contaminants
 - visual/olfactory evidence of existing contamination
 - evidence of damage to existing 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?

a) – the Solvent Recovery facility is situated 400m south-west from the village of Laughton Common and approximately 1km west of the village of Dinnington. It is located in the north western corner of the wider Safety-Kleen Dinnington site and covers an area of approximately 16,000m². A waste transfer station is located immediately east of the site on leased land. The area is approximately 0.14Ha, rectangular and 15km from Sheffield city centre which was previously used for chemical storage.

The area around these sites consist of agricultural land, a dismantled railway line, light industry, an industrial estate, a large water feature and residential properties. Two former landfill sites are located less than 100m east and south from the sites. The area is generally flat and is at about 100m AOD.

2.0 Condition of the land at permit issue

Has the applicant provided the following information as required by the application SCR template?



The geology at the site comprises:

- **Made Ground** comprising concrete overlying between 0.15m and 1.6m depth silty sandy gravel.
- **Superficial Deposits** comprising firm to stiff orange and grey mottled gravelly clay, light and dark grey clay and brown gravelly clay, between 0.4m and over 4.0m thick
- **Upper Coal Measures** comprising sequences of mudstones, siltstones and sandstones. Intrusive investigations suggest a thick sequence of grey mudstone interbedded with orange coarse weathered sandstone and black coal bands underlying the site. Base of formation not proven. Sandstone outcrops directly under part of the site. Encountered as weathered mudstone in leased area.

The Upper Coal Measures are designated as a minor aquifer. No licenced groundwater borehole abstractions are within 1km. Shallow groundwater is anticipated to flow towards Laughton East Junction Pond to the north of the site which is a manmade waterbody leased to Dinnington Fishing Club. Groundwater beneath the installation is potentially in hydraulic continuity with this pond but there is no obvious flow direction or marked groundwater strikes (from the baseline investigation) due to the characteristics of the underlying Coal Measures.

Eel Mires Dike is 400m north and flows in a south easterly direction discharging into Cramfit Brook 800m south east of the site. This brook had a chemical water quality classification of Grade B – Good and a biology classification of Grade E – Poor.

b) and c) – a conceptual site model (CSM) and potential pollution linkages were identified within the Phase 1 desk study and included the historic site land uses to identify substances and/or activities which may lead to land pollution. It was established that in 1855 the entire site and the surrounding area comprised undeveloped agricultural land remaining largely unchanged until the 1920s/1930s when railways were located immediately east and west of the site and a brick works was 200m south east. By 1948 the areas to the north east and east had become developed and Dinnington Colliery was 750m east of the site. By 1962 the railway was dismantled. In the 1980s a refuse or slag heap was 250m east of the site but the site remained undeveloped. Laughton East Junction Pond had been constructed. By 2000 the location of the two sites had been developed.

d) - an audit was undertaken and identified the following areas of potential soil and groundwater concern:

- fork lift truck diesel refuelling area
- concrete apron located in the north eastern corner adjacent to the waste transfer station storage bays
- sludge skip storage area in south west corner of the site

2.0 Condition of the land at permit issue

Has the applicant provided the following information as required by the application SCR template?

- compressor area
- integrity of site drains - a drainage survey report indicated that twenty four sections were defective.

A targeted intrusive investigation was undertaken to support the original application (due diligence report URS, 2006) to provide a report on the condition of the site prior to the permitted activities commencing on site under regulation. The intrusive investigation was designed to target potential sources of soil and groundwater contamination whilst also providing good site coverage. Another baseline investigation was undertaken in 2013. It was understood that similar activities were carried out on site prior to there being an associated permit. It is possible that permitted activities influenced the site prior to the 'baseline' investigations being completed.

There was evidence that low levels of organic contamination were present in the soils and shallow groundwater in many locations on the site. The contamination appears to be mainly petroleum hydrocarbons and occasionally solvents (BTEX, occasionally other VOCs). For most of the site, the concentrations of contamination measured were low.

3.0 Permitted activities

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

a) The original permit was issued to Safety-Kleen in January 2006. The Environment Agency determined that the Installation facility comprised the following scheduled activities as listed in Part 1 of Schedule 1 of the Environmental Permitting Regulations:

- Sections 5.3 Part A (1) a) (ii), 5.3 Part A (1) a) (ii) (A) and 5.3 Part A (1) a) (ii) (C).
- Sections 5.3 Part A (1) a) (iii), 5.3 Part A (1) a) (iv) and 5.3 Part A (1) a) (v).
- Sections 5.4 Part A (1) a) (i) and 5.4 Part A (1) a) (ii).
- Section 5.6 Part A (1) a).

The installations facility comprised catox treatment reactors, a DAF plant, a filter press, PFA fixation, a thermal desorption unit, sorting/crushing/blending/mixing/repackaging/bulking infrastructure, an oil treatment decanter, a waste recovery cooker, a sequencing batch reactor and air strippers. The installation facility took in a maximum capacity of 40,000T/yr of non-hazardous non-biodegradable waste and 80,000T/yr of hazardous wastes.

b) Directly Associated Activities at the Installation facility included:

- boiler house
- 4No. bulk tank farms (acetone, toluene, thinners, flammable waste waters and oils, mineral spirits and sludges, paint wastes, diesel) all were above ground storage tanks
- raw material storage and handling, distillation plant, drum filling and emptying lines. Waste thinners and non-bulk raw material were stored in a yard, and finished solvent product within a warehouse.

a) and b) The Environment Agency determined that the waste facility comprised an A9 facility: household, commercial and industrial waste transfer station with treatment (including WEEE) and asbestos storage, for the storage and treatment for the recycling of solvents and other solid hazardous wastes with non-hazardous wastes in separate areas of the site. Hazardous wastes permitted for the site were listed in Schedule 2 of the licence with activity codes listed as D9, D13, D14, D15, R3, R4, R5 and R13. Wastes of similar types transferred to other facilities for recovery or disposal. No asbestos containing wastes were treated on site. WEEE was treated inside a dedicated building and non-hazardous wastes were bulked up for recovery or disposal elsewhere. There were no directly associated activities.

3.0(a) Environmental Risk Assessment

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 Environment Agency reviewed the Operator's environmental risk assessment (H1) including the potential for environmental impact from emissions to air. The H1 was reviewed at the time of the original permit determination and accepted as satisfactory. An Improvement Programme was set within the original permit to ensure that the identified required improvements were undertaken over specified timescales at the installation.

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

Are the activities likely to result in pollution of land?

Conditions were set within the permit to ensure all plant, equipment and technical operations were in good working condition. It was concluded that there was little likelihood of pollution arising from the operation of the installation provided that it was operated and maintained correctly. There were no direct discharges of hazardous substances or non-hazardous pollutants to groundwater from the site.

There were four tank farms each of which had a concrete bund wall that contained 110% volume of the largest tank and/or 25% the total volume within each tank farm. The bund walls were in the order of 1m high. All tanks were mild steel and single skin construction. All pipe work was located above ground on overhead pipe bridges. Tank bunds were inspected on a six monthly basis.

An Improvement Programme was set within the original permit to ensure that the Environmental Management System (EMS) was officially certified, included fugitive emissions and included potential environmental improvements.

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?

Survey requirements of all bunded areas/tanks and impermeable surfaces were required and was included within the site EMS. The EMS also stated the requirements around storage and handling of wastes, accident prevention and control. To ensure the continued effectiveness of pollution prevention measures to protect the land the Operator was required to implement and operate under a Site Protection and Monitoring Programme (SPMP).

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.

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

Yes.

Date and name of reviewer:

Liz Ebbs

01/12/2017

Permit Operational Phase SECRET

4.0 Changes to the activities	
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) "Hazardous pollutants" used or produced.	
<p>The installation activity boundary within the surrender area has changed during the lifetime of the permit. In February 2008 a permit variation included an additional small parcel of land to the north-west of the site for the erection of a waste storage and processing building (waste transfer station). This was never built and the planning permission has now expired. The permit was not amended subsequently to reflect this.</p> <p>The installation permitted activities within the surrender area have changed during the lifetime of the permit. In February 2008 the number of activities undertaken on site were increased to add:</p> <ul style="list-style-type: none"> ➤ Catox treatment reactor, PFA fixation and filter press for hazardous and non-hazardous waste ➤ DAF plant for hazardous, non-hazardous and oily wastes ➤ thermal desorption unit and dished electrode membrane for hazardous waste ➤ hazardous waste sorting, crushing, screening and washing ➤ disk stack centrifuge and decanter centrifuge for oily waste ➤ sequencing batch reactor and air stripping. <p>The permit was varied in October 2011 to increase the permitted type of wastes allowed to be treated at the installation and a variation in November 2013 added 'Section 5.6 A(1)(a) Clinical and Waste Transfer Station – temporary storage of hazardous wastes in a facility with a total capacity exceeding 50 tonnes pending any activity' to the permit. This variation related to the proposed new waste transfer station which was never constructed. In 2012, the waste transfer station storage areas were improved and new waste acceptance bays were constructed for specific solid waste streams only.</p> <p>The most significant hazardous pollutants used by the facility for managing incoming wastes included benzene, toluene, ethylbenzene, xylenes, gas oil, diesel, paraffins, glycol, class A and B VOCs. Wastes to be processed included paint sludges, thinners emulsion and oil by-products.</p>	

5.0 Measures taken to protect land	
Has the applicant provided evidence from records collated during the lifetime of the permit, to show that the pollution prevention measures have worked?	
<p>Records of any incidents, accidents and near misses were recorded, investigated and corrective and/or preventative actions taken where appropriate in accordance with the site EMS. Regular site audits and inspections were undertaken as well as reviewing site incidents (such as spill reports), tank testing reports and drainage surveys. All inspection records were kept as required by the Environmental Permit. Safety-Kleen conducted six monthly inspections of the hardstanding and kerbing across the site under the site's Planned Preventative Maintenance system as well as visual inspections of the site interceptors.</p> <p>The drainage systems on site dated from 1988. A CCTV survey and cleaning of the whole drainage system at the Safety-Kleen site (installation and waste transfer station) was undertaken in October 2005. The drainage survey report identified defected areas of drainage and repairs were undertaken under the waste transfer station but none were required/undertaken under the installation facility.</p> <p>The activities within each zone were assessed in terms of the potential risk of releases to land over the lifetime of the permit and took into account the nature of the activity, the associated hazardous substances, containment measures in place and possible deficiencies in these, and any evidence of previous site incidents. The assessment identified the following permitted activities assessed to have presented a potential risk to soil and groundwater:</p> <ul style="list-style-type: none"> ➤ Zone B - tanker terminal and bulk storage, fork-lift refuelling ➤ Zone D - ancillary areas and roadways, interceptor ➤ Zone B, Zone C and Zone D - site drainage defects. 	

Also, during the lifetime of the permit, some decommissioning works were undertaken where infrastructure was identified as being beyond repair and at risk of causing an environmental incident.

Date	Zone	Details and actions taken to manage risk of ground contamination during change	Implications for closure site condition?
2007	B	Diesel tank (Tank 31) decommissioned and cleaned following purchase of the site (2007)	Unlikely owing to containment measures in place
2007	B	Mineral spirit sludge tank (Tank 20) and four dirty mineral sludge tanks (Tanks 22-25) decommissioned and transferred off site following purchase of the site (2007)	Unlikely owing to containment measures in place
2011	C	TDU drained (note: but not cleaned) following decision to decommission the plant	Unlikely owing to volumes of liquid involved

6.0 Pollution incidents that may have impacted on land and their remediation

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)?

Numerous incidents were reported comprising spills, leaks, failed infrastructure, traffic collision, poor house keeping and damaged IBCs/drums. All were minor incidents being cleaned up by spill kits or absorbent materials, contained within drains and/or interceptors or bunds, or collected in drums or sumps. No reports of impacts on unprotected ground and groundwater was recorded. No reports for any incidents prior to August 2013 were provided. It is understood from discussions with site operatives and site managers that there were no major incidents on site during Tradebe's ownership.

Tank 12 containing waste solvents was emptied and its use terminated because a pin hole leak had developed (date unknown). There are implications for site closure as the leak time length is not known but the hole was believed to be wholly above ground and therefore contained within the bund. Internal investigations were carried out following environmental incidents at the site, in accordance with the requirements of the site's ISO14001 system. No intrusive investigations are known to have been carried out to obtain soil or groundwater samples relating to the incidents reported above.

Also, three non-compliances were recorded during the lifetime of the permit for:

- over-stocking of hazardous materials in designated and non-designated storage areas posing a significant risk to the environment
- improper waste storage; use of poor quality containers; absence of bunding at site entrance. Return inspection confirmed that the steps to be taken were completed satisfactorily
- a breach in standards for containment of stored materials, EMS and operating procedures.

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?

The permit Application Site Report (ASR; URS 2005) concluded that there was no need to obtain site specific reference data within the operational zones Zones B, C and D. This was due to the presence of suitable pollution prevention measures, the adequacy of integrity testing of the pollution prevention, an EMS and operator and management competence with the relevant activities.

Baseline site conditions were detailed in two reports.

Permit Surrender Phase SECRET

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 following reports have been submitted by the Operator as part of the full surrender application for both the waste and installation facilities:

- 'Vendor Due Diligence, Safetykleen, Dinnington' final issue No.1 44320056/MARP00003 dated December 2006, URS. This included general site information, environmental setting, site history, on-site environmental issues, CSM. It was considered that this report covered the baseline data for Zones B, C and D.
- 'Baseline Condition Survey Dinnington Waste Management Centre Bookers Way Sheffield on behalf of Tradebe Management Limited' ref: A0302/R1/V1.0 dated December 2013, Earth Environmental and Geotechnical. It was considered that this report covered the baseline data for Zone F.
- 'Dinnington Solvent Recovery Plant – Environmental Permit Site Closure Report: Factual and Interpretative Site Investigation Report' ref: 301917 R01 (00) dated September 2017, RSK.
- 'Dinnington Solvent Recovery Plant – Environmental Permit Surrender Site Condition Report' ref: 355044 R1 (02) dated June 2017, RSK.

Site operations ceased in May 2017. A decontamination log was provided within the surrender SCR listing all the plant, infrastructure and drainage that had been decommissioned, what was done to decommission it, when and where the waste or cleaned infrastructure was taken for reuse or recovery. The site was inspected by the Environment Agency on 11 January 2018. In summary, decommissioning included:

Bulk storage tanks and transport pipelines:

All bulk tanks were emptied and cleaned and the electrics disconnected. The bunds were cleaned with a jet wash. Several tanks remain on-site with the agreement of the future land owner (empty and cleaned). The pipe bridges including connections between the process building and tank farm, between the tank farms, and the pumps and filters within the tank farms, were all drained and flushed out by site staff. A labelling system was used to identify which pipelines had been cleaned. Waste Transfer Notes/Hazardous Waste Consignment Notes are held by the Operator. Three bulk storage tanks were relocated to the Tradebe Heysham site in November 2016 and eight storage tanks were relocated in January 2017 to the Tradebe Knottingley site.

Site treatment infrastructure:

The Cooker was removed in November 2015 to be overhauled and put into storage at the Knottingley site awaiting installation at another Tradebe site or sale of the unit. The shredder was relocated to the Fawley site in December 2016. The oil processing equipment including baffle tank and centrifuges were relocated to the Tradebe Scotoil site in Aberdeen in November 2016. The Thermal Desorption Unit was dismantled in May/June 2017 to go into storage in Germany with a view to a potential sale to another company. Secondary liquid fuel blending was relocated to the Heysham site. All equipment was electrically isolated prior to removal. Other minor equipment items such as the emergency generator, air compressor and maintenance shop equipment were relocated to other Tradebe sites. The paint hopper was cleaned to remove waste residues. All work was undertaken by specialist contractors in accordance with regulations.

Raw materials and wastes:

All bulk raw materials, wastes and processed product were removed from the site in October 2016. However, small quantities of drummed and IBC waste were observed to be stored in an unbunded area near the tank farm. This was reported as a permit breach and the site was issued with a warning to clear waste from the site in accordance with the Closure Plan. Waste Transfer Notes/Hazardous Waste Consignment Notes are held by the Operator.

Drainage and interceptors:

Following cessation of activities a CCTV drainage survey and cleaning of the wider drainage and sump network was undertaken in May 2017. All aqueous effluent from the decommissioning cleaning works was directed into the site drainage system. The wastewater was tested for suitability to be discharge from the interceptor in accordance with the permit with any wastewater that exceeded the permit criteria being pumped into Tank 27 for off-site disposal. No details were provided regarding potential removal of the interceptor.

Tank Farm 2:

Ponded bund water was tested in accordance with onsite procedures for managing potentially contaminated bund water and removed from site for waste disposal via tanker. The bunds were then cleaned again.

Equipment remaining on site

The majority of the bulk solvent storage tanks will remain on site (emptied and cleaned). The weighbridge, CCTV system, fire water tank and fire water pumps, mezzanine floors within the processing building etc will all remain on site. All pipe bridges will remain on site and all process lines were drained and flushed out and are clearly labelled as such.

No pollution incidents have been reported by the operator as having occurred as part of the site decommissioning works.

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?**

Reference data has been collected and submitted as part of this surrender application comparable to the baseline data collated for soils and groundwater submitted with the original application and due diligence report. No remediation has been undertaken. Baseline data for Zones B, C and D obtained in September 2006 as part of a vendor due diligence investigation associated with the sale of the land to Tradebe (URS 2006) is appropriate to use for these parts of the site. For Zone F, in the absence of any earlier data, the most appropriate baseline data is that obtained in December 2013 as part of the lease agreement relating to this area of land.

An intrusive investigation was undertaken in Zones B, C, D and F in July 2017. Groundwater monitoring wells were developed and two rounds of groundwater monitoring were completed in August 2017. Limited evidence of olfactory and visual contamination was observed during the sampling rounds.

Zone B:

A potential difference from the baseline was identified in soils at BH401 near the former gas oil tank. The petroleum hydrocarbons identified, mainly comprising aliphatic C12-35 fractions, are of low water solubility and hence low mobility in the water environment. The groundwater sampling completed has shown the concentrations of these contaminants to be below the level of detection. This suggests that the risk posed to controlled waters from leaching is likely to be low.

Zone D:

A potential difference from the baseline was identified in soils and groundwater at HP4. The site closure drainage survey was reviewed and HP4 in Zone D was targeted to an identified defect. Two soil samples were collected at 0.3m and 0.75mbgl. The sample from 0.75mbgl (a depth close to the likely depth of the drainage run) reported elevated petroleum hydrocarbon concentrations (mainly C10-C16 aliphatics) and the presence of two related VOCs.

Concentrations in the groundwater were found to mainly comprise aromatic C8-C12 petroleum hydrocarbon fractions, perhaps reflecting the greater solubility of these fractions and leaching from soils. The results have been compared to WHO Drinking Water Standard in the absence of any Environmental Quality Standard. The concentrations of all fractions are below this standards. This suggests that the risk posed to controlled waters from leaching is likely to be low.

Based on the findings of this investigation and two rounds of groundwater monitoring and assessment, the site is considered to meet the condition of satisfactory state at permit surrender. There are considered to be no on-going primary sources at the site following decommissioning. Sections of the drains, sumps and bunded area were cleaned in May 2017 which may have resulted in the dislodging of contamination within the drains and subsequent release to ground via the identified defect areas. Ultimately no ongoing source is considered to be present.

10.0a and 10b 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?

The investigation has appropriate coverage targeting the main areas of concern as previously identified in consultation with the Environment Agency. Overall the investigation did not identify any widespread contamination or gross contamination hotspots. No continuous body of groundwater was identified with several of the investigation points being dry. The encountered geology was predominantly Made Ground, clays, siltstones and mudstone. Some isolated areas of sand or gravel were identified in a few locations. The investigation found that the membrane underlying the concrete was not present in all locations. The nearest sensitive receptor is a body of water that exists just north of the site.

As all of the site activities have ceased and the site decommissioning has been completed adequately, the Environment Agency consider the site to be returned in a satisfactory state although some identified contamination warrants additional discussion (see below). The Environment Agency undertook a final site inspection to confirm this in January 2018.

Acetone (Propanone) was identified in many of samples taken across the site (maximum concentration was 1,930µg/kg). No acetone was identified in any of the groundwater samples taken and tested. There does not seem to be any associated chemicals that would indicate a widespread release of contamination from the site. Acetone was analysed for by two separate laboratories however, only one of the laboratories identified acetone in the samples tested. The results were queried but no explanation could be provided. Therefore, the Environment Agency do not consider that the concentrations of acetone identified present a significant ongoing risk to controlled waters.

A variety of contaminants were identified in HP4 (Zone D - ancillary areas and roadways) at elevated concentrations in an area with identified broken drainage. The contamination therefore could have been sourced from different areas of the site, rather than a specific spill. TPH was identified in soils (838mg/kg) at 0.75m but not in a shallower sample taken at 0.3m. This indicates that it was not from a source that had infiltrated through soils at this location and likely to have leaked from the site drainage. The site investigation report states that the hydrocarbon contamination is made up of less mobile fractions and limited contamination was found in groundwater samples. A series of Tentatively Identified Compounds (TICs) were identified in HP4 that were only evident in the deeper sample and not in the shallow soils or groundwater samples. It is thought that both the TPH and the TIC contamination represented an isolated leak from the drainage system and not from a source considered to present an ongoing risk to controlled waters.

Elevated levels of MTBE (2,480µg/l) were identified in BH403. MTBE is not a product (or constituent of a product) handled by the site's operations so cannot be attributed to the permitted activities carried out at the site.

To conclude, while some contamination has been identified across the site it is understood that there are no ongoing sources of contamination or significant hotspots that present a continuing risk to controlled waters. The above comments relate to the surrender of an Environmental Regulations Permit (EPR/GP3638MX) and a Waste Management Licence (EAWML 100309, EPR/LP3595VA). Should the site be redeveloped in the future then due regard should be given to the site's industrial past and additional investigation and remediation may be required.

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.	√
Date and name of reviewers: Liz Ebbs (NPS) – 22/12/2017. Alex Chambers (GWCL) – 24/01/2018. Martin Turner (Area) - 25/01/2018. Kirsty Hobbs (NPS) - 25/01/2018.	