

Application SCR evaluation template

Name of activity, address and NGR	Knostrop Wastewater Treatment Works Knowsthorpe Lane Leeds West Yorkshire LS9 0PJ NGR: SE33820 31722. EPR/RP3199SY/S004.
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Document reference of application SCR	Knostrop WwTW Conditioning Slab Surrender Site Condition Report (Document reference YWS-KNO-REP001). Knostrop Conditioning – Working Plan for the Sludge Conditioning Site, version 1.
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Date and version of application SCR	23 March 2018. 24/01/2012
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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 working plan (version1, 2012) at the time the original application was made no baseline data was included. Drawings were also provided by the Operator and reviewed and accepted by the Environment Agency at the application stage.

2.0 Condition of the land at permit issue

(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?

The Knostrop Conditioning Working Plan (version1, 2012) contains the details on the site history and sensitive receptors. No pollution, desk study data, conceptual site model, intrusive investigations, background data collection was provided as the original application was for a Standard Rules Permit which have to have a low environmental risk in order to qualify for this status.

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

a) SR2008No.16 – temporary storage and subsequent blending of permitted non-hazardous waste(s) with dewatered sludge to enable treatment of waste(s) via conditioning, <75,000 tonnes per year.

b) None

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.

Geotechnical investigations in 2010 concluded that the redundant final effluent filter bed structure was not water tight and wouldn't prevent contaminants entering into the ground and groundwater and therefore it would not be possible to undertake composting of sludge on the redundant bed. Therefore, in consultation with the EA, YWS constructed a concrete pad over the redundant filter bed media and developed an appropriate drainage and collection system with an associated pumping station to pump the captured drainage to the treatment works inlet.

The Environment Agency reviewed the Operator's environmental risk assessment including the potential for environmental impact from emissions to air and water. The risk assessment was reviewed at the time of the original permit determination and accepted as satisfactory.

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

(Conceptual model)

Are the activities likely to result in pollution of land?

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.

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?

The Knostrop WwTW Conditioning Slab operates in accordance with the YWS Integrated Management System (IMS) which identifies and minimises risks of pollution by regular inspection of above and below ground assets within the permit boundary. The YWS operator undertakes weekly IMS inspections at the site. No fuel was stored on the site and spill kits were kept on site to address any leaks from operational plant e.g: burst hydraulic hose.

Application SCR decision summary	Tick relevant decision
Sufficient information has been supplied to describe the condition of the site at permit issue	✓
Pollution of land and water is unlikely; or	✓
Date and name of reviewer:	<i>L. Moller 04/06/2018</i>

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	
<p>The permitted activity changed from SR2008No.16 to a bespoke permit (28/05/2015) and varied to reflect changes from IED (20/04/2016). Permitted activities on the current permit are:</p> <ul style="list-style-type: none">• S5.4 A(1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment. R3 – limited to physical treatment, conditioning, maturation, blending, shredding under aerobic conditions and the storage of associated wastes. <p>Permitted activities include:</p> <ul style="list-style-type: none">• Storage of non-hazardous wastes pending recovery• Physical treatment for the purpose of recycling• Storage of processed waste• Raw material storage• Surface water collection and storage <p>The change from a SR2008No.16 to a S5.4 A(1) (b) (i) activity was to import low levels of additional wastes that potentially contain treated wood, wood preserving agents or other biocides, persistent organic pollutants to mix with sewage sludge on the conditioning slab.</p>	

5.0 Measures taken to protect land (Pathway)
<p>Has the applicant provided evidence from records collated during the lifetime of the permit, to show that the pollution prevention measures have worked?</p>
<p>There are no additional protection measures stated in the permit. All impermeable surfaces were regularly inspected and any defects addressed. All actions were recorded within a Site Diary.</p> <p>Site drains were also regularly inspected, especially after heavy rainfall events, to assess blockages due to fines runoff from the storage and treatment processes. Blocked or restricted drains were cleared and cleaned. All actions were recorded within a Site Diary.</p> <p>Control measures were in place to contain and clear-up any leaks and spills. Waste acceptance and rejection procedures were in place to ensure only permitted waste was accepted and treated on the site. Bio-aerosols, odours and dust levels were monitored and recorded on site but this was not a requirement of the Permit.</p>

6.0 Pollution incidents that may have impacted on land and their remediation (Sources)
<p>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>
<p>There have been no pollution incidents recorded during the lifetime of the permit which could have impacted upon land or water. Therefore, no remediation activities were required during operation.</p>

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?
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N/A

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
<p>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?</p>
<p>The permitted activity is no longer undertaken on site as a large proportion of the site has been used for the development of a new Anaerobic Digestion (AD) facility. The remaining area of the conditioning slab is used for the storage of dewatered sludge which it was not mixed with any imported waste and therefore does not require a permit. The CAR (dated 14 November 2017) identified the concrete slab was in good condition and observed no cracking.</p> <p>Records of the site and surrounding areas were reviewed, along with operational site records, in order to describe the condition of the site and, in particular, to identify any substance in, on or under the land that may constitute a pollution risk to the land. Pollution prevention measures were identified and an assessment of pollution potential to land has been undertaken</p>

9.0 Reference data and remediation (where relevant)
<p>Has the applicant provided details of any surrender reference data that they have collected and any remediation that they have undertaken?</p> <p>(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.</p>
<p>N/A</p>

10.0a & 10.0b Statement of site condition
<p>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?</p>
<p>YWS propose to surrender the permit for the Knostrop WwTW Conditioning Slab following the cessation of mixing waste material as recommended by the EA. The permit has been in operation since 2011.</p> <p>The Surrender Site Condition Report has demonstrated through a review of monitoring and maintenance records during the lifetime of the permit, discussions with YWS operatives and a site visit that the Knostrop WwTW Conditioning Slab is in a satisfactory state.</p> <p>The records of the site and surrounding areas that have been reviewed, along with operational site records and the site visit demonstrate that there has been no pollution to land.</p> <p>The conclusion of the report is the land has not deteriorated from the baseline condition since the permit application was submitted. Therefore, the permit may be surrendered because the site condition is in a satisfactory state.</p>

Surrender SCR decision summary	Tick relevant decision
<p>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</p>	<p>✓</p>

<p>Date and name of reviewer</p> <p>Laura Mellor (NPS) – 04/06/2018.</p> <p>Liz Ebbs (NPS) – 08/06/2018.</p>	
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