

Application SCR evaluation template

Name of activity, address and NGR	Brighthouse Upper Sludge Treatment Facility Bridghouse Upper WWTW Cooper Bridge Road Mirfield WF14 0BU National Grid Reference SE 17494 21020.
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Document reference of application SCR	Upper Brighthouse Sludge Treatment Facility Surrender of Permit GP3636LB (Document reference YWS-UBR-REP001)
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Date and version of application SCR	19 March 2018
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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 an Application Site Report (ASR) at the time the original application was made. 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 ASR produced by Arup (October 2006) contained all the details on the site history, pollution, desk study data, conceptual site model, previous investigations, background data collection (soil and groundwater). The Environment Agency considered that this report adequately describes the condition of the site and in particular identified any substance in, on or under the land that may constitute a pollution risk.

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) S5.3 A1 (c)(ii) Physico-chemical treatment of Non-hazardous sewage sludge (D9) Receipt of sludge into process, separation of sludge solids from water by Gravity Belt Thickeners, polymer make up, liquor storage and return pipework, Waste types to be as specified in Schedule 3 tables S3.2 and S3.3 .	

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 Environment Agency reviewed the operator's assessment of the environmental impact of emissions from the installation. The applicant indicated there would be no significant emissions to air, land or water from the installation. The assessment showed that, applying the conservative criteria in H1, all emissions may be categorised as environmentally insignificant.

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

(Conceptual model)

Are the activities likely to result in pollution of land?

The Environment Agency reviewed the Operator's environmental risk assessment (H1) including the potential for environmental impact from emissions to air and water. We concluded that there is a "reasonable possibility" of future pollution of the land and therefore reference conditions must be established. However, Integrity testing (December 2008) concluded that there is "little likelihood" of pollution. The permit was issued with two improvement conditions regarding the underground pipework at 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?

To ensure the continued effectiveness of pollution prevention measures to protect the land we are required the operator to implement and operate a Site Protection and Monitoring Programme, the design of which must be reported to the Agency within two months from the date of permit issue.

Application SCR decision summary	Tick relevant decision
Sufficient information has been supplied to describe the condition of the site at permit issue	Accepted at permit determination of EPR/GP3636LB on 21/05/07
Pollution of land and water is unlikely	Accepted at permit determination of EPR/GP3636LB on 21/05/07
Date and name of reviewer:	Phil Reynolds 21 st May 2007

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	
<ul style="list-style-type: none">• Administration variation EPR/GP3636LB/V002 (2007) to amend and remove various conditions to add clarity to the permit.• Permit variation EPR/ GP3636LB/V003 (2009) to increase through-put, the removal of one gravity belt thickener and the installation of two drum thickeners.• EA initiated Permit variation EPR/GP3636LB/V004 (2014) to implement changes to the listed activities following the introduction of the Industrial Emissions Directive.	

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?
The Sludge Treatment Facility (STF) is surrounded by other Wastewater Treatment Works (WwTW) plant on all sides, and the majority of the ground surface is concrete or tarmac, with very little vegetation. The STF operates in accordance with the Yorkshire Water Services Ltd (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. Asset Inspection Reports dated October 2010 and March 2013, have been provided as evidence.

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)?
There have been no pollution incidents relating to the STF which may have impacted on land or water.

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?
Although it was concluded that the collection of reference data was required at permit determination, the Operator submitted site specific risk assessments as part of the SPMP as an alternative. These were assessed by the Environment Agency and accepted as satisfactory. Therefore no reference data was required during the operational phase of the permit.

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?
YWS propose to surrender the permit following cessation of dewatering for disposal. The site will remain operational with dewatered sludge sent for recycling only. Under the Environmental Permitting (England and Wales) Regulations 2016 this activity is exempt from requiring a permit. The STF will remain managed by YWS.

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 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.
N/A

10.0a and 10.0b 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?
A site walkover of the Upper Brighthouse STF was undertaken to visually assess the land condition and site infrastructure. Asset inspections have been conducted by Morgan Sindall Grontmij Joint Venture (MGJV) in March 2013 for YWS on the integrity of the assets (storage tanks, below and above ground pipes and sumps). The visual inspection of above ground assets did not reveal any significant defects. Previous asset integrity inspections at the Upper Brighthouse STF were carried out by Ove Arup and Partners in October 2010. All structures and pipework on YWS operational installations are designed to relevant British Standards, Codes of Practice and to YWS own additional Engineering Specifications to ensure that they are fit for purpose and will maintain their structural integrity for the duration of their asset life. We are satisfied that no pollution incidents relating to the STF which may have impacted on land or water have occurred and the infrastructure is of a satisfactory quality. No decommissioning has taken place due to the site continuing to operate but with the activity being exempt from requiring a permit.

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 reviewer Laura Mellor (NPS – Permitting Officer) – 23/05/2018 Kirsty Hobbs (NPS – Permitting Officer) – 25/05/2018	