

## Application SCR evaluation template

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

Name of activity, address and NGR	ForFarmers UK Limited Blandford Heights Industrial estate Blandford forum Dorset BT11 7TL ST 8889307626
Document reference of application SCR and surrender SCR	Site condition Report June 19 (Doc 1) Soil Sampling Report 2006 (Doc 1a) Baseline report (Doc1b) Application site report (Doc 1c) CAR form & clean up evidence (Doc 1d, 1e) Site Closure Plan (Doc 2) Internal transfers (Doc 2a) Waste transfer / Consignment notes (Doc 2b) Tank cleaning / degas certificates (Doc 2c) Decommissioning photos (Doc 2d to 2q) Accident Management Plan (Doc 3) Accident assessment table (Doc 3a) SPMP June 19 (Doc 4) System procedures summary (Doc 4a) Operating procedures summary (Doc 4b) Work instruction summary (Doc 4c1, 4c2) Site maintenance plan (Doc 4d) Sample Service Logs / inspections (Doc 4e, f, g) Site services plan (Doc 4i) Interceptor, gully cleaning records (Doc4j)

<b>1.0 Site details</b> (Source)	
<b>Has the applicant provided the following information as required by the application SCR template?</b>	<b>Response (Specify what information is needed from the applicant, if any)</b>
Site plans showing site layout, drainage, surfacing, receptors, sources of emissions/releases and monitoring points	Baseline Report (Doc 1b) Site Services Plan (Doc 4i)

<b>2.0 Condition of the land at permit issue</b> (Receptor)	
<b>Has the applicant provided the following information as required by the application SCR template?</b>	<b>Response (Specify what information is needed from the applicant, if any)</b>
a) Environmental setting including geology, hydrogeology and surface waters b) Pollution history including: <ul style="list-style-type: none"> <li>• pollution incidents that may have affected land</li> <li>• historical land-uses and associated contaminants</li> <li>• visual/olfactory evidence of existing contamination</li> <li>• evidence of damage to existing pollution prevention measures</li> </ul> c) Evidence of historic contamination (i.e. historical site investigation, assessment, remediation and verification reports (where available)) d) Has the applicant chosen to collect	Made ground overlies the upper chalk of the Blandford chalk, which is considered a major aquifer. There are no surface waters in the vicinity of the site, the River Stour is the closest water source located 700 m west of the site. No recorded pollution incidents to surface waters. Site personnel indicates no recent external pollution incidents or known areas of contamination. Potential pollution from ongoing activities (Animal feeds manufacture) may exist in the form of Hydrocarbons, PAHS, PCBs, Detergents, disinfectants and organic matter. In the vicinity of the site there has historically been a railway line, infectious diseases hospital, potential tipping area, industrial estate and fuel tanks which may be sources of contamination.

<b>2.0 Condition of the land at permit issue</b> (Receptor)	
<b>Has the applicant provided the following information as required by the application SCR template?</b>	<b>Response (Specify what information is needed from the applicant, if any)</b>
baseline reference data?	Intrusive investigation was undertaken in 2006 – involving the excavation of nine boreholes utilising windowless sampling and collection of twelve samples for analysis of total petroleum hydrocarbons (TPH). No significant sources of contamination have been identified within areas of the site under investigation.

<b>3.0 Permitted activities</b> (Source)	
<b>Has the applicant provided the following information as required by the application SCR template?</b>	<b>Response (Specify what information is needed from the applicant, if any)</b>
a) Permitted activities b) Non-permitted activities undertaken at the site	Section 6.8 A(1)(d)(i) – Treating and processing materials intended for the production of food products from vegetable raw materials at plant with a finished product production capacity of more than 300 tonnes per day (average value on a quarterly basis). Directly associated activities include <ul style="list-style-type: none"> <li>- Storage and handling of raw materials, chemicals and oils in bulk storage silos, bulk storage tanks, drums, IBCs and other containers</li> <li>- Reprocessing, storage and handling of waste materials</li> <li>- Operation of abatement systems for the control of emissions to air and releases to land</li> <li>- Operation of systems for the supply of utilities and services such as electricity, steam, water and compressed air</li> </ul>

<b>3.0(a) Environmental Risk Assessment (Source)</b>	
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.	An accident assessment for the installation was submitted. At permit issue it was concluded that appropriate measures are in place to ensure that accidents that may cause pollution are minimised. However, there are potential emission sources and so the permit was issued with appropriate measures to prevent emissions to land/groundwater.
<b>3.0(b) Will the pollution prevention measures protect land and groundwater? (Conceptual model)</b>	
Are the activities likely to result in pollution of land?	<p>As stated above, the accident pollution prevention measures were accepted at permit determination. However, the permit was issued with appropriate measures for emissions.</p> <p>It was concluded that adequate information was provided in the ASR to enable the Environment Agency to determine the application. However, it was identified that there were certain data gaps in the ASR and so the permit was issued with Improvement Conditions:</p> <ul style="list-style-type: none"> <li>- to investigate the options which avoid the discharge of surface water to land through soakaways</li> <li>- to submit proposals for the monitoring of emissions of particulate matter.</li> <li>- To review the capacity and design of bunds for bulk liquid storage tanks</li> <li>- To review the extent and design of surfacing and containment for all operational areas</li> <li>- To review the design, operation and maintenance of the surface water drainage system to prevent contaminations of surface water discharged to land through soakaways</li> <li>- To review the storage of waste oil</li> <li>- To establish a site closure plan.</li> </ul> <p>A site protection and monitoring programme (SPMP) was supplied for the site.</p>
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?	Adequate information was provided in the ASR to enable the determination of the application. The permit was issued with improvement conditions and emission limits.

<b>Application SCR decision summary</b> To be completed by GWCL officer and returned to NPS	<b>Tick relevant decision</b>
Sufficient information has been supplied to describe the condition of the site at permit issue; or	Adequate information was provided in the ASR to enable the determination of the application, however, the permit was issued with Improvement Conditions and appropriate measures for emissions to land and water.
Pollution of land and water is unlikely with the conditions set in the permit	
Historical contamination may be present- advise operator that collection of background data may be appropriate	
Date and name of reviewer	Phil Reynolds 28 November 2005

## Operational phase SCR evaluation template

(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.

<b>4.0 Changes to the activities</b> (Source)	
<b>Have there been any changes to the following during the operation of the site?</b>	<b>Response (Specify what information is needed from the applicant, if any)</b>
a) Activity boundaries b) Permitted activities c) "Dangerous substances" used or produced	None Variations in 2015 and 2017 where to change a company name and company address respectively.

<b>5.0 Measures taken to protect land</b> (Pathway)	
Has the applicant provided evidence from records collated during the lifetime of the permit, to show that the pollution prevention measures have worked?	<p>Environmental inspection records are present for 2016 – 2019.</p> <p>These include checks against liquids handling, tanks, bag filters, cooler cyclones, interceptors, septic tanks and soakaways, Drains, hardstanding, waste, storage containers, air system, steam system and asbestos containing materials.</p> <p>No inspection actions were recorded.</p> <p>A maintenance plan and SPMP were kept and reviewed during the lifetime of the permit along with records for cleaning of the drainage system. Secondary containment, spills kits, training and incident reporting were in place at site. All waste were removed via appropriate waste transfer/consignment notes.</p> <p>The site operated under an Environmental Management System.</p>

<b>6.0 Pollution incidents that may have impacted on land and their remediation</b> (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)?	<p>One incident was recorded on CAR form 13/05/14. The permit specified that the discharge to land through soakaway is for uncontaminated surface water only. The surface water drainage to W2, W3, W4 and W5 is contaminated through site activities.</p> <p>A clean up was undertaken and new site drainage plan developed. A soakaway consignment note is provided.</p> <p><u>GWCL Comment March 2020</u> The consignment note refers to oily water being removed from the soakaways but there are no further details of the cleanup or any investigation into impacts on the surrounding soils or groundwater.</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?

Soil sampling was undertaken in 2006. The results indicate that contamination is not present within the soils surrounding the soakaways at the site, that is causing or has the potential to cause significant harm to human health, groundwater, controlled waters, local fauna or flora, and this unlikely to impact on underground/utility services or adjacent properties. As no significant risk to human health or the environment has been identified for the continued use of the site, no regulatory or third party liability associated with Part IIA of the Environmental Protection Act 1990 has been identified as part of the assessment. No further assessment of the investigated area or remedial works are recommended at this time as no significant risk has been identified and the site is considered suitable for its continued use.

### GWCL Comment March 2020

The above is quoted from the applicant's Phase 2 Contamination Assessment (RPS, August 2006) and sets out the situation at permit issue. **No soil or groundwater monitoring has been carried out during the life 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.

<b>8.0 Decommissioning and removal of pollution risk</b>	
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?	<p>The mill ceased production on the 9<sup>th</sup> May 2019 and was decommissioned on the 31<sup>st</sup> May 2019. The Environment Officer visited the site to verify decommissioning and no issues were raised to the permit holder's knowledge.</p> <p>During the life of the permit all improvement conditions, permit requirements (MCerts testing) and permit report were met (EPI's, fugitive emissions, objectives and targets, accident management plan, site closure plan, site protection and monitoring and programme, waste minimisation and water efficiency. The environmental and energy management system remained in place including the site aspects register. There were no significant environmental accidents on the site.</p> <p>The site closure plan addressed environmental pollution risks that may occur during decommissioning of the site. It confirms, along with photographic evidence and supporting reports that all waste streams have been removed from site and product sold or removed. The asbestos management plan was up to date at the time of decommissioning, the drainage system was purged with water to clean the system. Buildings have not been demolished and the site is for sale.</p>

## 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.

### GWCL Comment March 2020

Reference data has been provided in Environmental Site Assessment Version 2 (SLR, February 2020) to investigate potential deterioration around soakaways as a result of pollution from hydrocarbons noted in 2014 CAR form.

Soil samples were taken from boreholes close to the soakaways in locations comparable to those used in the 2006 RPS investigation to support the permit application.

Gross contamination from hydrocarbons is not identified on the site but there appears to have been a localised impact to shallow soils near Soakaway 1 where TPH was detected in WS207 at 1,122 mg/kg in 2020 compared to 102 mg/kg in 2006. This contamination is almost exclusively heavy end fractions (>C21) and therefore of low mobility. This is supported by the fact that no discernible contamination was identified in deeper natural soils in this borehole.

The environmental risk from this contamination is concluded as being low in the report based on the low mobility, significant depth to groundwater and distance to surface water receptors. GWCL are in agreement with this conclusion.

That being said, the data does show a deterioration in the condition of soils in this location. The impact appears to be shallow and likely localised in horizontal extent (no elevated concentrations at nearby WS208) so it may be warranted to expect this 'hotspot' to be removed in order to return the site to its pre-permit condition. However, without any appreciable environmental risk from the contamination this may not be justified

## 10.0 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?

The permitted activities stopped on 9<sup>th</sup> May 2019. Decommissioning is complete and the pollution risk has been removed.  
The Environment Officer visited the site on 29<sup>th</sup> May 2019 to verify decommissioning and no issues were raised.

### GWCL Comment March 2020

The data provided suggest that the site considered as a whole poses no greater environmental risk now than prior to the permit issue. However, there has been some localised deterioration to shallow soils near soakaway 1. Whilst these could be removed and the site returned to its pre-permit condition relatively easily (small amount of soil needed to be removed), the environmental benefit would be negligible.

<b>Surrender SCR decision summary</b> To be completed by GWCL officers and returned to NPS	<b>Tick relevant decision</b>
<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; or</p>	<p><u>GWCL Comment March 2020 – Ben Hayball</u>            I am satisfied that the site poses low risk of pollution despite there being some localised deterioration to shallow soils near Soakaway 1 due to hydrocarbon contamination.</p> <p>Whilst there may be an argument to require the operator to remove this contamination to return the site to its pre-permit state, it is not considered to pose significant environmental risk and removal would not provide significant environmental betterment.</p>
<p>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:</p>	
<p>Date and name of reviewer</p>	<p>Zoe Clarke 18/09/2019</p>