Application SCR evaluation template

Name of activity, address and NGR	Crewe Animal Feed Mill, Crewe Gates Farm Industrial Estate, Fourth Avenue, Crewe, Cheshire CW1 6BN
	NGR: 371900,354450
Document reference of application SCR	Original permit application dated 2016 Ref.: EPR/YP3734RQ/A001 Original 2016 SCR On EDRM under EPR-YP3734RQ Application – bespoke Site condition report supporting documents – save on EDRM 20/11/2015
	Limited.vso Surrender dated 2020 Ref.: EPR/YP3734RQ/S003 All site condition and baseline report documents on EDRM under reference EPR-YP3734RQ – All saved 28/01/2020 Key SCR documents
	Application Surrender – Crewe Site condition report (ref CREWE MILL YP3734RQ)
	Application Surrender Crewe Baseline report - SLR Ref: 406.05827.00002.005 October 2016

Date and version of application SCR	Date of application: 21/01/2020 Date of SCR 28/01/2020
	Date of baseline report October 2016

1.0 Site details
Has the applicant provided the following information as required by the application SCR template?
Response : Accepted at original permit application determination stage, 28/09/2016
Layout – Plan 002 of Main Application.
Drainage plan – Some details on Plan 002 of Main Application – Requested a more detailed plan – supplied 30/06/2016.
Surfacing – Some details on Plan 1.1 Artificial Ground Map of EMS-327605_441385.
Emissions/Monitoring – Some details on Plan 002 of Main Application.
Site plane showing site loyout drainage, surfacing, recenters, sources of emissions/releases and

Site plans showing site layout, drainage, surfacing, receptors, sources of emissions/releases and

1.0 Site details

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

Response : Accepted at original permit application determination stage, 28/09/2016

monitoring points

Application Surrender Crewe Baseline report - SLR Ref: 406.05827.00002.005 October 2016



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Layout – Plan 002 of Main Application.

Drainage plan – Some details on Plan 002 of Main Application – Requested a more detailed plan – supplied 30/06/2016.

Surfacing – Some details on Plan 1.1 Artificial Ground Map of EMS-327605_441385. Emissions/Monitoring – Some details on Plan 002 of Main Application.

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?

- 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) Yes – Section 3.0 of the SCR states that the site is underlain by superficial Diamiction deposits (unproductive) and the underlying solid bedrock geology comprises sidmouth mudstone formation (secondary B aquifer). The site is not within an SPZ and the nearest surface water feature is 350m away.

b) Yes – Sections 3.0 and 4.0 of the SCR, it is stated that:

- Two recorded pollution incidents within 500m. The closest is 175m east of the site, Cat 2 fire water run-off in 2007.
- Previously fields and woodland prior to development in 1970s.
- No visual evidence of pollution.
- No damage to pollution prevention measures
- c) See Section 3.2 of SCR together with supporting information in Doc Ref. EMS-327605_441385.

d) See Section 5.2 – advised as prudent to collect baseline data but no commitment has been made together with supporting information in Doc Ref. EMS-327605_441385.

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	Permitted activity
b) Non-permitted activities undertaken at the site.	S6.8 A(1) (d) (ii)
	Treatment and processing of vegetable raw materials with a finished product capacity greater than 300 tonnes per day.
	Directly associated activities Two natural gas fired boilers used for the generation of steam: Boiler No.1 – thermal input of 1.13 MW Boiler No.2 – thermal input of 1.51 MW Washing of bulk vehicles in a designated vehicle wash area
3.0(a) Environmental Risk Assessment (Source)	

On EDRM

Application Surrender – Environment Risk Assessment (Doc 3a)



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

Are the activities likely to result in pollution of land?

See original site condition report

Application – bespoke Site condition report supporting documents – save on EDRM 20/11/2015



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 Table 2 of SCR. Chemicals are stored in appropriate containers (such as the Supplier's primary packaging or bulk storage tanks) in bunded areas or on hardstanding in designated storage areas.

Application SCR decision summary	Tick relevant decision
Sufficient information has been supplied to describe the condition of the site at permit issue	х
Information is missing- the following information must be	

obtained from the applicant.	
Pollution of land and water is unlikely; or	Х
Pollution of land and water is likely	
Historical contamination is present- advise operator that collection of background data may be appropriate	
Historical contamination is present- advise operator that collection of background data may be appropriate As stated above section 5.2 of the SCR recommends baseline reference data is established, notably within the area associated with fuel storage / USTs given. However, we understand the applicant has not committed to undertake these additional works. We recommend the applicant determines whether baseline reference data is required taking into account the new requirements for baseline reporting and periodic monitoring under IED. Please see attached H5 guidance and EC guidance concerning baseline reports and when one is required. Please note the new requirements for baseline reporting and periodic monitoring under IED only apply to hazardous substances. The requirement to set baseline reference data for any other polluting substances is still only a recommendation.	Historical contamination is present- advise operator that collection of background data may be appropriate As stated above section 5.2 of the SCR recommends baseline reference data is established, notably within the area associated with fuel storage / USTs given. However, we understand the applicant has not committed to undertake these additional works. We recommend the applicant determines whether baseline reference data is required taking into account the new requirements for baseline reporting and periodic monitoring under IED. Please see attached H5 guidance and EC guidance concerning baseline reports and when one is required. Please note the new requirements for baseline reporting and periodic monitoring under IED only apply to hazardous substances. The requirement to set baseline reference data for any other polluting substances is still only a
	recommendation.
Date and name of reviewer:	11. 7.16
Lindsey Berends	//.//

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)		
	ve there been any changes to the following during e operation of the site?	Response (Specify what information is needed from the applicant, if any)	
a) b) c)	Activity boundaries Permitted activities "Dangerous substances" used or produced	No No No	
5)		Only variation undertaken was administrative	

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?

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)?

7.0 Soil gas and water quality monitoring (where relevant)

To be completed by GWCL

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?

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

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?

NPS comments based on application content

According to the documentation provided, all permitted activities have ceased and all sources of pollution risk have been removed. The mill ceased production on the 13.09.19 and was decommissioned on the 10.02.20.

No issues were raised after decommissioning was made aware to the local EA Officer. Applicable documentation like the site closure plan, accident management plan, internal transfers, decommissioning photos, drainage cleaning and proof of inspection were provided. The last recorded compliance assessment report (Report ID: YP3734RQ/0362164) and other supporting documents on EDRM further confirms this.

EM/PPC comments

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.

There have been no significant environmental accidents or incidents on the site. The installations officer did not note any significant issues on site. The maintenance plan has been provided and evidence of its use has also been provided.

The baseline report did note that there was likely to be historical contamination in the area because of former land uses, however the operator decided not to take baseline samples and so natural background concentrations for soil contamination were used in the assessment.

The main focus was on the fuel storage areas which contained diesel products along with pumping stations for vehicles.

The Environmental Risk Assessment SLR Ref No: 406.05827.00006 produced in March 2020 does identify areas where there are contaminants elevated above background levels, however these are low and they are likely to be from historical sources. There is no evidence of significant/ widespread contamination.

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?

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?

The covering letter dated 28.1.20 states that the mill has ceased ;production and has been decommissioned

The letter states that no significant environmental instruments have occurred on site during the life of the permit

Petrol Interceptor cleaned and emptied with certificate supplied

Underground UST for water storage has been capped with concrete

The closure plan has been submitted with various pieces of evidence showing that the plan has been implemented.

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	х
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:	
Date and name of reviewer	Carl Highton 24/6/20