


## Application SCR evaluation template

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

Name of activity, address and NGR	Crewe Boiler House Bentley Motor Cars Pyms Lane Crewe Cheshire CW1 3PL  NGR: SJ68425629
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Document reference of application SCR	Bentley Motor Cars LTD, Pyms Lane, Crewe, Cheshire, Ramboll Environmental Permit (EPR) surrender site condition report   Bentley Motors Limited.vso
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Date and version of application SCR	Sept 2020
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<b>1.0 Site details</b> To be completed by NPS (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	Application site report, ENVIRON (REF: 63-C674), March 2006  Surrender, site condition report, Ramboll UK Ltd (Ref: 1700003696), April 2019  Appendix 1 – Application site report, I ENVIRON (Ref: 63-c9674), March 2006  Figure 1 – Site Location Figure 2 – Original Installation Boundary Figure 3 – Plant layout Figure 4a – Emissions to air Figure 4b – Emissions to water Figure 4c Drainage plan  Surrender site condition report, Ramboll UK Ltd (Ref: 1700003696), April 2019: Figure 6 – Revised Boiler House site plan 2019

<b>2.0 Condition of the land at permit issue</b> To be completed by GWCL officers (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> </ul>	(Note: see Bentley Motor Cars Ltd, Pyms Lane, Crewe, Cheshire Ramboll EPR surrender site condition report for site H5 references)

<b>2.0 Condition of the land at permit issue</b> To be completed by GWCL officers (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>
<ul style="list-style-type: none"> <li>• evidence of damage to existing pollution prevention measures</li> <li>c) Evidence of historic contamination (i.e. historical site investigation, assessment, remediation and verification reports (where available)</li> <li>d) Has the applicant chosen to collect baseline reference data?</li> </ul>	

<b>3.0 Permitted activities</b> To be completed by NPS officers (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>
<ul style="list-style-type: none"> <li>a) Permitted activities</li> <li>b) Non-permitted activities undertaken at the site</li> </ul>	<p>Section 1.1(A) - Burning any fuel in an appliance with a rated thermal input of 50 megawatts or more.</p> <p>DAA – Reverse Osmosis water treatment plant.</p> <p>Two medium fuel storage tanks located adjacent to the boiler house (removed in late 2008 and replaced by a single low sulphur diesel bulk storage tank) The low sulphur diesel tank was subsequently removed in April 2018)</p> <p>There were 5 boilers originally operated on site, with a total capacity of 57.5MWth. Two of the boilers were removed off site in August 2017; the remaining three boilers were removed during September 2018. Three new 5.5MWth Cochran gas fired boilers providing a new total capacity of 16.5MWth were installed during 2018/2019. The resulting installed aggregated capacity of the boiler system on-site is currently below the 50MW limit for an A1 permit.</p> <p>Blow down pit (remains in use)</p>

<b>3.0(a) Environmental Risk Assessment</b> To be completed by NPS officers (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.	<p>Original H1 Risk assessment is located on EDRM as part of original permit application.</p>  <p>Bentley Motors.vso</p> <p>No updated H1 provided as the five boilers originally operated on site, with a total capacity of 57.5MWth have been replaced with three new 5.5MWth Cochran gas fired boilers providing a new total capacity of 16.5MWth which were installed during 2018/2019. The resulting installed aggregated capacity of the boiler system on-site is currently below the 50MW limit for an A1 permit.</p>

<b>3.0(b) Will the pollution prevention measures protect land and groundwater?</b> To be completed by EM/PPC officers (Conceptual model)	
Are the activities likely to result in pollution of land?	The five boilers originally operated on site, with a total capacity of 57.5MWth have been replaced with three new 5.5MWth Cochran gas fired boilers providing a new total capacity of 16.5MWth which were installed during 2018/2019. The resulting installed aggregated capacity of the boiler system on-site is currently below the 50MW limit for an A1 permit.
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 five boilers originally operated on site, with a total capacity of 57.5MWth have been replaced with three new 5.5MWth Cochran gas fired boilers providing a new total capacity of 16.5MWth which were installed during 2018/2019. The resulting installed aggregated capacity of the boiler system on-site is currently below the 50MW limit for an A1 permit

<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	
Information is missing- the following information must be obtained from the applicant. <b>(Advise the permitting team on what additional information is needed)</b>	
Pollution of land and water is unlikely; or	

(Pollution prevention measures just need to be reviewed during operation of the site)	
Pollution of land and water is likely (Advise the permitting team on what additional controls/checks may be necessary)	
Historical contamination is present- advise operator that collection of background data may be appropriate	
Date and name of reviewer	

## 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>	
To be completed by EM/PPC officers (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	
<p>The boundary of the installation changed in late 2008 as a result of the two above ground medium fuel tanks being removed together with the associated pipe and tank trace heating system.</p> <p>The tanks were replaced by a 50,000 litre single low sulphur diesel aboveground storage tank. The change in fuel oil was undertaken following an alternative fuels assessment) in March 2008 which was agreed by the environment agency.</p> <p>Subsequently, the low sulphur diesel bulk storage tank was removed in April 2018. No replacement fuel tank was installed following the removal of the low sulphur diesel tank. The boilers utilised natural gas only.</p> <p>There were five boilers originally operated on-site, with a total capacity of 57.5MWth. Two of the boilers were removed off-site in august 2017. The remaining three boilers were removed during September 2018. Three new 5.5MWth Cochran gas fired boilers providing a new total capacity of 16.5MWth were installed during 2018/2019. The resulting installed (aggregated) capacity of the boiler system on-site is currently below the 50MW limit for an A1 permit. Therefore, the site is requesting to surrender their current Part A1 permit (ref: MP3434LQ, dated December 2006)</p>	

## 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?

A Site Protection and Monitoring Programme (SPMP) was prepared in April 2007 and detailed the Inspection and Monitoring Protocols. The report was submitted to the Environment agency to fulfil the relevant condition within the permit. Site advised that this was further updated in May 2009 to take into account the removal of the medium fuel oil ASTs and the replacement with a single low sulphur diesel tank. Also again in February 2016 with information related to the change in computerised planned maintenance system and to provide information on the energy management system certified to ISO 50001 that has been implemented,

The permit does not set limits for monitoring of Air, Water or sewer emission's as part of schedule 4 as there are no point source emissions. Therefore the SPMP detailed only a testing, inspection and maintenance programme to ensure that the installation's pollution prevention measures were maintained and continued to be effective.

The sites SPMP includes details of the inspections and maintenance undertaken on the process equipment, namely the five boiler units; the former low sulphur diesel bulk storage tank; the reverse osmosis (RO) water treatment plant; boiler water dosing chemical storage and the Blow down vessel and pit. Evidence outlining the information collected for the inspections is included in Appendix 3 of the Surrender Site condition report located on EDRM (link provided below).

Additionally, the site has a method statement for fuel oil deliveries which indicates the measures taken to prevent pollution (see Appendix 4 of the surrender site condition report). The maintenance team training matrix indicates staff competency on a scale of 0 (no skill) to 4 (able to train), and provides evidence that staff are adequately trained to operate the boiler house (appendix 5 of the surrender site condition report)

Two spill kits are located within the installation boundary. The location of the spill kit is provided in appendix 6 of the surrender site condition report. The general spillages procedures indicates the steps taken in the boiler house should spillage occur. (see appendix 7 of the surrender site condition report)

The site has specific local operations instructions for the boiler house including the isolation of steam services, immobilisation of plant, boiler chemical deliveries procedure, energy control and monitoring procedure, blowdown interceptor procedure, gulper cleaning procedure and emergency call out procedure. These are located in Appendix 8 of the surrender site condition report.

BML employed independent environmental consultants to audit the site against the conditions set out within their part A1 permit. The audit formed part of a rolling schedule of environmental audits relating to compliance and the protection of the land and water. Audit reports are available for 2009, 2016 and 2018 in appendix 9 of the surrender site condition report. Any findings raised within the audits would be put onto BML's "action tracker" documented and closed out in a timely manner. These audits ensured BML's activities were in compliance with the A1 permit and that the land in the vicinity of the permitted installation was appropriately protected.



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## 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)?

Site have confirmed that a review of Bentley's Environmental Incident Logs concluded that there have been no pollution incidents which could have impacted the land associated with the boiler house or backup fuel. No reports have been located on EDRM.

## 7.0 Soil gas and water quality monitoring (where relevant)

To be completed by GWCL officers

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?

Following the removal of two above ground medium fuel tanks in late 2008, site carried out soil samples in 2009 which confirmed that the soil was not contaminated and as such did not need to be handled as hazardous waste (see appendix 10 of the surrender site condition report.)

Following the removal of the low sulphur diesel tank, site confirmed that the underlying hard standing was observed to be free of staining.

## 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?

Full decommissioning of the installation has not been undertaken as the facility will continue to operate using three new 5.5MWth Cochran gas fired boilers providing a new total capacity of 16.5MWth which were installed during 2018/2019.

The resulting installed (aggregated) capacity of the boiler system on-site is currently below the 50MW limit for an A1 permit. Therefore, the site is required to surrender their current Part A1 permit (ref: MP3434LQ, dated December 2006).

In late 2008 the two 310m3 medium fuel oils tanks and the associated pipework and tank trace heating system were decommissioned and removed. The method statement for the decommissioning of the tanks (i.e. cleaning of tanks) and the risk assessment provided by Action Smart Environmental Ltd for the removal is available in appendix 11 and 12 of the surrender site condition report. Certificates of cleaning, and gas free certificates are referenced in appendix 13 and 14 of the Surrender Site Condition report. Soil sampling test was taken at the time to confirm the underlying land had not been impacted. The tank was substituted with a low sulphur diesel tank.

In April 2018, the low sulphur diesel tank was decommissioned and removed. The fuel within the tank was used by Bentley and once empty, the tank was taken off-site to be cleaned and disposed of. The decommissioning method statement and risk assessment for flushing out the fuel pipework along with photographs are located in appendix 16, 17 and 18 of the Surrender Site Condition Report. Site confirmed that the underlying hardstanding beneath the former AST was clean and showed no evidence of staining and so no soil samples were taken.

A site closure plan has been included as part of the original application and can be referenced in Appendix 19 of the Surrender Site Condition plan..

Of the five boilers originally operated on-site, two of the boilers were removed off-site in August 2017 and the remaining three boilers were removed during September 2018. The decommissioning process followed the procedures included in the site closure plan (Ref: 63-C9674) (appendix 19 of the Surrender Site condition Report. A work order report was generated for the decommissioning of all the boilers and this indicates the precautions undertaken during the process. (Photographic evidence showing the boiler replacement is included in appendix 22 of the Surrender Site Condition Report.

Site have confirmed that the former fuel tanks containing medium fuel oil and the low sulphur diesel, and the former boilers and associated pipework have been decommissioned and removed. They have also confirmed that there is no wet fuel storage associated with the new boilers that could present a pollution risk.



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### 10.0 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?

Site have advised that based on the evidence which has been provided, the land has been deemed to be in a satisfactory condition, and that adequate measures have been taken to ensure the land has not been affected by the actions undertaken within the installation boundary.



## 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.

2018 fuel tanks were replaced, and only natural gas used for the boilers. Section 8 outlines the tank removal process and land condition after removal.

The supporting information from the applicant is satisfactory and confirms no uncontrolled emissions to ground which would trigger additional clean-up and investigations.

## 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?

Yes.

## 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

X

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 be obtained from the applicant before the permit is determined:

Date and name of reviewer

L. Beveridge

18 Nov. 2020