

Application SCR evaluation template

Name of activity, address and NGR	Rainbarrow Farm, Martinstown, Dorchester, Dorset DT2 9JF NGR: SY65984, 90086
-----------------------------------	---

Document reference of application SCR	<p>Case Reference: EPR-MP3197EJ Document Date: 25/08/2020 Title/Subject: Application Surrender Customer Name: JV Energen LLP Site Name: Rainbarrow Farm</p>  <p>JV Energen.vso</p> <p>Document Number: 11486004 Case Reference: EPR-MP3197EJ Document Date: 25/08/2020 Title/Subject: Form and supporting information Author: JV Energen Addressee: PSC Site Name: Rainbarrow Farm</p>
---------------------------------------	---

Date and version of application SCR	Date of application: 29/06/2020 Date of SCR : 29/06/2020
-------------------------------------	---

1.0 Site details
<p>Has the applicant provided the following information as required by the application SCR template?</p> <p>Response : Accepted at original permit application determination stage</p>
Yes
Site plans showing site layout, drainage, surfacing, receptors, sources of emissions/releases and monitoring points
Yes

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? Yes
<p>a) Environmental setting including geology, hydrogeology and surface waters</p> <p>b) Pollution history including:</p> <ul style="list-style-type: none"> • pollution incidents that may have affected land • historical land-uses and associated contaminants

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? Yes	
<ul style="list-style-type: none"> • 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? 	

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)
<ul style="list-style-type: none"> a) Permitted activities b) Non-permitted activities undertaken at the site. 	Permitted activity S5.3A(1)(a)(II) — The disposal or recovery of hazardous waste S5.6A(1)(a) — Temporary storage of hazardous waste Section 5.4 Part A(1) (b) (i) and section 6.8 Part A(1)(c) of the Environmental Permitting Regulations – Recovery of Waste
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.	
Yes.	

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	
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?	

Application SCR decision summary	Tick relevant decision
Sufficient information has been supplied to describe the condition of the site at permit issue	

Information is missing- the following information must be obtained from the applicant.	
Pollution of land and water is unlikely; or	
Pollution of land and water is likely	
Historical contamination is present- advise operator that collection of background data may be appropriate	
<p>Historical contamination is present- advise operator that collection of background data may be appropriate</p> <p>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.</p> <p>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.</p>	
Date and name of reviewer:	

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	No No No 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?
Should have provided 'nil' returns.

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)?
Yes

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?
We are not aware of any monitoring having been undertaken 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 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?

9.0 Reference data and remediation (where relevant) To be completed by GWCL officers
No SCR was required at original permit issue in 2011 but one was produced at variation in 2015. No site specific baseline chemical data was included in the previous SCR and none is presented now so evaluation is based on pollution incident history and the pollution prevention measures on the site.
Although there was a spillage incident in January 2015 (reported to EA under NIRS 1306173) involving loss of containment of liquid and solid digestate, surfaces within the permit boundary were impermeable so unlikely to have been caused pollution of underlying soils or groundwater. There was some impact to an adjacent field but classified as Cat3 minor impact to land.
According to the SCR, pollution prevention measures are very good on the site and provided their condition is confirmed by the regulating officer we are in agreement with the SCR that there is very little risk of any impact to the site condition from the permitted activities and therefore the lack of chemical data is justified.
As the site is understood not to have operated by accepting waste, less regulation has taken place in recent years because the site became a non-waste crop fed site.

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?
Yes. Permitted Activities are believed to have ceased. At around the time of the permit surrender application there was an incident that related to recent activities on the site which were not related to waste. This incident resulted in 1,000's tonnes of carbon dioxide equivalent of uncontrolled biogas gas being vented to atmosphere. The site is not considered to have taken waste for a number of years. Had a relevant permit been in place then it would have been possible to take further enforcement action against the permit requirements, but the incident is considered to be out of the scope of the permit. There is no decommissioning works the site although the site is being modified in light of the recent event in order to manage future biogas to reduce wastage and pollution to air. It was decided it was not safe to undertake a visit to assess the condition of the land until the works on site have been completed. Jim Wilkinson 11/11/2020

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?
Although the site no longer needs a permit because waste will no longer be used as a feedstock, a pollution risk remains since it will still be producing digestate.

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	Yes
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	Ben Hayball 8/10/20