



Application SCR evaluation template

Name of activity, address and NGR	Essex Road Waste Oil Facility Essex Road, Hoddesdon, Hertfordshire EN11 0AT NGR: 533615, 208583
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Document reference of application SCR	 W Davies.vso Case Reference: EPR-ZP3038MZ Document Date: 13/02/2020 Title/Subject: Application Surrender - 200214 R JER1020 Customer Name: Biomarsh Environmental Limited Site Name: TES oil and Water Plant  Biomarsh Environmental Limiti
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Date and version of application SCR	Date of application: 13/02/2020 Date of SCR 14/02/2020
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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)
<p>Has the applicant provided the following information as required by the application SCR template?</p> <p>a) Environmental setting including geology, hydrogeology and surface waters b) Pollution history including:</p> <ul style="list-style-type: none"> • 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

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?	
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)
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
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.	

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	X

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?
Life time records had not been provided as part of the surrender application. Groundwater monitoring was carried out in support of the surrender application.

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. Photos provided following the clean up of a spillage that occurred in 2014.

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?
2018 and 2019 groundwater monitoring was completed. Hydrocarbon concentrations were lower those found in the more historic monitoring from 2003-2009.

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?
Final Site inspection carried out by video call using MS Teams on 8Dec2020 at 14.30. All existing buildings and bunded areas have been removed from the site and the ground concreted. Inspection carried out by JLaguda.

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.
Two rounds of subsequent groundwater monitoring were completed in 2018 and 2019. Issues with this have been discussed at length previously – the 9 year gap in groundwater monitoring made it hard to capture long term groundwater trends.
Agreed that with further detailed information about the site decommissioning works and reassurance of pollution prevention measures, then I would support permit surrender.

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?
Condition of the site reviewed during the final remote inspection carried out on 8/12/2020.

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?
Virtual site inspection confirmed that the site has been decommissioned appropriately, with new areas of concrete surfacing in previously operational areas.

Surrender SCR decision summary	Tick relevant decision
To be completed by GWCL officers and returned to NPS	
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 to be obtained from the applicant before the permit is determined:	
Date and name of reviewer	Alex Coates 09/12/2020

A virtual site inspection was held on the 8th December 2020. Key observations were:

- The former area of the site building, where some site activities took place, has been resurfaced with new concrete hardstanding. We also received a method statement from the contractor who undertook these works, giving confidence that the works were completed appropriately and wouldn't have been a risk to the wider environment.
- The bunding has been removed and this area resurfaced with new concrete hardstanding.
- There were no major cracks in the hardstanding on site that could've represented a pollutant pathway.
- There was no visible oil staining on site.

Given these points I am now comfortable to support the surrender of this permit.