

Application SCR evaluation template

Name of activity, address and National Grid Reference	<p>TW Composting Limited</p> <p>Kirby Lodge Compost Site, Gretton Brook Road, Corby, Northamptonshire, NN17 3AS</p> <p>Application Reference EPR/WP3232QX/S002</p> <p>NGR: SP 91818 91987</p>
---	---

Document reference, date and version of application SCR	Site Surrender Report: Kirby Lodge Compost Site, reference ECCS 136 001 R 001 A, dated August 2020 produced by EC Consultancy Services Ltd.
---	---

1.0 Site details

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

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

Provided in support of Environmental Permit application EPR/DP3295LA/A001 (EAWML 100729); accepted and determined on 23/03/09.

2.0 Condition of the land at permit issue

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?

The site was originally permitted under standard rules SR2008No17_75kte with associated generic risk assessment. An application SCR was provided in support of variation EPR/CB3538RB/V003; accepted and determined on 23/01/18.

3.0 Permitted activities

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

The site was originally permitted under standard rules SR2008No17_75kte and then later varied to be permitted under S5.4 A(1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving biological treatment. There were the following directly associated activities:

- Storage of waste pending recovery or disposal – R13: Storage of waste pending the R3 operation (excluding temporary storage, pending collection, on the site where it is produced)

3.0 Permitted activities	
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"> Physical treatment for the purposes of recycling – R3: Recycling/reclamation of organic substances which are not used as solvents Raw material storage Process water collection and storage Surface water collection and storage Air treatment 	

3.0(a) Environmental Risk Assessment
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.
Originally permitted under standard rules SR2008No17_75kte with associated generic risk assessment. Permit application EPR/DP3295LA/A001 (EAWML 100729) was accepted and determined on 23/03/09. An environmental risk assessment was provided for variation application EPR/CB3538RB/V003 from standard rules to bespoke installations permit, which was accepted and determined on 23/01/18.

3.0(b) Will the pollution prevention measures protect land and groundwater?
Are the activities likely to result in pollution of land?
The site was regulated under standard rules SR2008No17_75kte and was deemed to meet the specific criteria for this permit type; accepted and determined on 23/03/09.
As stated above, an environmental risk assessment was provided for the variation from standard rules to bespoke installations permit and this was assessed and found to be satisfactory. Operations were carried out on a reinforced concrete pad forming an impermeable base and the site had a sealed drainage system. An accident management plan was in place for the site with spill kits available. Fuel was stored in double bunded tanks with 110% capacity, and all hydraulic and lubricating oils stored securely in appropriate containers within designated areas.
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?
Yes – The site was originally regulated under standard rules SR2008No17_75kte and was deemed to meet the specific criteria for this permit type; accepted and determined on 23/03/09. An environmental risk assessment was provided for variation application EPR/CB3538RB/V003, which was accepted and determined on 23/01/18. Further details above.

Application SCR decision summary	Tick relevant decision
Sufficient information has been supplied to describe the condition of the site at permit issue	Accepted at permit determination of EPR/DP3295LA/A001 (EAWML 100729) on 23/03/09
Pollution of land and water is unlikely	Accepted at permit determination of EPR/DP3295LA/A001 (EAWML 100729) on 23/03/09
Date and name of reviewer: (07/12/20)	<i>Kirsty Hobbs</i>

Operational phase SCR evaluation template

4.0 Changes to the activities	
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) "Hazardous pollutants" used or produced.	
<p>The site was originally regulated as a standard rules facility and then varied to an installations bespoke permit. This was due to the proximity of sensitive receptors, which meant the site no longer met the standard rules criteria and required an installations permit to meet the Industrial Emissions Directive requirements. The annual throughput, waste types accepted and activities on site remained unchanged.</p> <p>Original standard rules permit EPR/DP3295LA (EAWML 100729) issued to County Mulch Limited on 23/03/09 and then transferred in full to Material Change Corby Limited (EPR/CB3538RB) in 2011. Permit was varied as a Newly Prescribed Activity under IED to an installations bespoke permit in 2017/2018, and at the same time company name change (to Material Change Decoy Limited) and installation boundary extended. Permit transferred in full to Material Change Limited (EPR/AP3632JT) in early 2018 and then to TW Composting Limited (EPR/WP3232QX) later that year.</p>	

5.0 Measures taken to protect land	
<p>Has the applicant provided evidence from records collated during the lifetime of the permit, to show that the pollution prevention measures have worked?</p>	
<p>The surrender application provided information on the preventative measures taken to protect the land, air and groundwater. The site implemented an Environmental Management System (EMS) and this included operational and maintenance procedures. Regular inspections were undertaken of infrastructure and surfacing. All waste operations were carried out on a reinforced concrete pad forming an impermeable base and the site had a sealed drainage system. All leachate generated from the activity was collected in a below ground leachate tank fitted with a visual/audio high level warning device. Clean roof water was collected in drainage pipes and channelled underground into a holding tank, and outside hard standing water was channelled to an above ground tank.</p> <p>There was originally an open leachate lagoon as part of the site's drainage system and this was infilled in 2016 when it was replaced by above ground leachate tanks. Discussions took place with the Environment Agency leading up to the infilling of the lagoon and to confirm the replacement tanks were fully operational. There are no concerns regarding the infilling works that could impact on the low risk surrender status.</p>	

6.0 Pollution incidents that may have impacted on land and their remediation	
<p>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>	
<p>The Surrender Report mentions that during the operational phase the site did receive complaints, however, these were amenity related for flies and odour issues. It is stated that these did not result in any pollution to land, surface or groundwater at the site, and that the site did not experience any majority spillage incidents or significant loss of containment incidents.</p> <p>A pollution incident was recorded on the Environment Agency's National Incident Recording System (NIRS) in November 2010; two small fires involving composting material were observed in the maturation yard. The incident was reported to the Fire and Rescue services who attended site, and the operator also remained on site until the fire was extinguished. Afterwards site procedures were reviewed and no further action was required.</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?
N/A – Not required.

Surrender SCR Evaluation Template

8.0 Decommissioning and removal of pollution risk
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?
All permitted activities have ceased and all sources of pollution risk removed. Further details of the decommissioning steps undertaken are provided in the Surrender Report, including photographs of the site as evidence.
Whilst an in-person site inspection has not been able to be undertaken due to Covid-19 restrictions, the Regulatory Officer has viewed the site through video and has seen that the site is clear of all waste. The Surrender Report includes photographs from the decommissioning phase.

9.0 Reference data and remediation (where relevant)
Has the applicant provided details of any surrender reference data that they have collected and any remediation that they have undertaken?
N/A – Low Risk Surrender, therefore no intrusive investigation is required.

10.0 Statement of site condition
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?
All permitted activities have ceased and the site has been decommissioned as far as is practicable. The operator has confirmed that all pollution risks have been removed and the site has been returned in a satisfactory state.
Therefore we the Environment Agency have reviewed the application for surrender made by the Operator and accept the statement of site condition and view it as being returned in a satisfactory state.

Surrender SCR decision summary	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	✓
Date and name of reviewers: Kirsty Hobbs (NPS) – 07/12/20 Laura Mellor (NPS) – 20/12/20	