

Application SCR evaluation template

Name of activity, address and NGR	Upfield Foods UK Limited, Purfleet Sourcing Unit, London Road, Purfleet, Essex, RM19 1SD East 556950 North 177380
-----------------------------------	--

Document reference of application SCR	EA/EPR/NP3930QG/S005 (permit number NP3930QG)
---------------------------------------	---

Date and version of application SCR	Site Condition Report dated 21 September 2020 version 1, Appendices A-E. Monitoring Well Decommissioning Final Report, 28 October 2020, version 1.
-------------------------------------	---

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

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?

- 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-c) Yes

d) no but reference data taken in 2016 which was previously accepted by the EA when site and permit ownership was transferred from Unilever to Upfield Foods UK Limited .

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

Yes

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.

As part of the original permit application in 2006, the current Environment Agency environmental risk assessment was not applicable and none has been requested since by the EA.

Further information on substances used as part of the permitted processes are set out in the site investigation by Ramboll in 2016 which was reviewed by the EA under the previous partial surrender application (ref *EPR/NP3930QG/S003*) Further comments were provided by the EA in May 2020 as pre-application advice prior to the full surrender application in September 2020.

The environmental setting and substances used is also presented in the ERM site investigation from 2020 described in *Section 9* and Appendix E of the SCR.

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

(Conceptual model)

Are the activities likely to result in pollution of land?

Pollution prevention measures that were implemented during the life of the permit included:

- Drain integrity testing and repairs where required;
- Regular maintenance of site equipment (manufacturing and ancillary equipment); and
- Inspection and maintenance of tanks, bunds and external hardstanding areas.

A comprehensive environmental (soil and groundwater) site assessment and investigation has been undertaken by ERM in August / September 2020, incorporating the written advice given by the EA following a Pre-Application meeting on 27th May 2020 with Gwenda McIntyre (Permitting Officer), Andy Salmon (Technical Specialist, Land Contamination) and Gail Harvey (Installations Officer)

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?

All areas of the site have been cleaned and /or hazardous substances removed. In addition comprehensive shallow groundwater monitoring points were installed in any areas of concern and sampled to demonstrate no likelihood of future pollution as a result of the permitted activities. These monitoring points were all subsequently decommissioned to prevent them becoming a future potential pathway to groundwater.

Application SCR decision summary	Tick relevant decision
Sufficient information has been supplied to describe the condition of the site at permit issue	Yes, refer to 2016 Ramboll reports
Information is missing- the following information must be obtained from the applicant.	
Pollution of land and water is unlikely; or	yes
Pollution of land and water is likely	
Historical contamination is present- advise operator that collection of background data may be appropriate	
Date and name of reviewer:	12/01/2021 Paul Barker, NPS

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	
a) <i>The permitted area includes a small are of overlap with the ADM permit operated by Pura Foods (EPR ref BU7677IZ)</i> b-c) No	

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?
Yes

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)
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?
Yes report provided by applicant on 28/10/2020 confirmed that a total of 28 groundwater monitoring wells installed during site investigation works in 2016 and 2020 have been fully decommissioned following EA surrender advice to prevent them becoming a preferential pathway for future groundwater contamination.

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?
Yes

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).
Yes from 2016 at site transfer to Upfield Foods UK limited

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, final site inspection carried out on 24 August 2020 confirmed permitted activities had ceased and decommissioning works were complete. Please refer to final site inspection CAR form (Report ID: NP3930QG/0371973 issued 02/09/2020).

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?
Yes

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	Andy Salmon 13/11/2020