

## Application SCR evaluation template

Name of activity, address and NGR	<p>Activities relating to the Condensate Storage Facility: Main activity: S1.2 Part A(1)(e)(i) the loading, unloading, handling or storage of, or the physical, chemical or thermal treatment of crude oil</p> <p>Directly associated activity: Gas flaring at condensate storage facility (Flaring of gas from the condensate storage facility during tank filling, as a result of temperature or pressure changes and in emergency situations. Venting of gas from the condensate storage facility in emergency situations).</p> <p>Address: Condensate Storage facility Barrow Gas Terminals Rampside Road Barrow in Furness Cumbria LA13 0QU</p> <p>NGR: SD2047567850</p>
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Document reference of application SCR	<p>Application SCR document reference MGL 519 SCR Rev 0 March 2017</p> <p>The 2017 Application SCR is provided as Appendix E of the 2021 Application Surrender Site Condition Report 325360-R01.</p> <p>DMS links: <a href="#">Application Surrender - Site Condition Report - Appendix E Application SCR.pdf</a></p> <p><a href="#">Application Surrender - Site Condition Report - Barrow Condensate Storage Facility Partial Permit Surrender SCR No Signatures.pdf</a></p>
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Date and version of application SCR	<p>The 2017 Application SCR to include the condensate storage facility in the installation is 'Rev 0 March 2017'.</p> <p>The 2021 Site Condition Report 325360-R01 for application to surrender the condensate storage facility is 'Revision 02 December 2021'.</p> <p>Both reports are based on the SCR template v2.0 4 August 2008.</p>
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### 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

**Check plans provided by the applicant (see also Part A of the application form). If information is missing then request further dated plans be supplied.**

**Note from NPS Senior Permitting Officer for partial surrender EPR/BX1675IT/S010:**

## 1.0 Site details

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

See the following Site Plans in the 2017 Application SCR provided as Appendix E of the 2021 Application Surrender Site Condition Report 325360-R01 (DMS link: [Application Surrender - Site Condition Report - Appendix E Application SCR.pdf](#)) Site plans showing:

site layout - yes

drainage - yes

surfacing - yes

sources of emissions/releases – yes – conceptual site model

monitoring points –yes - borehole locations plan

receptors – yes:

- Environment Agency nature and Heritage Conservation Screening provided as Appendix D to application EPR/BX1675IT/V007 (DMS link: [Application Variation Forms and Supporting Information Part6 9835372.pdf](#))
- section 3.1.4 and 3.1.5 of Surrender Site Condition Report 325360-R01 (DMS link: [Application Surrender - Site Condition Report - Appendix E Application SCR.pdf](#)).
- See also, information provided in section 9 (Conceptual model and likelihood of contaminant release) of the Site Condition Report 325360-R01 for application to surrender the condensate storage facility (DSM link: [Application Surrender - Site Condition Report - Barrow Condensate Storage Facility Partial Permit Surrender SCR No Signatures.pdf](#))

See also the updated site plans provided in the Figures for the Surrender Site Condition Report 325360-R01. DMS link for figures: [Application Surrender - Site Condition Report - Figures.pdf](#)

Figure 1 Site location plan (showing all terminals)

Figure 2 Site layout plan

Figure 3 Existing exploratory hole and monitoring well locations

Figure 4 Historical tank locations

Figure 5 Permit activities and waste areas

Figure 6 Site photographs showing condensate storage tanks and main pipe trench

Figure 7 Site photographs showing ancillary buildings

Figure 8 Site photographs showing other infrastructure

Figure 9 Drainage system and photographs showing drainage features

Figure 10 Schematic of site drainage

Figure 11 Site surfacing (plan and photographs)

See also the Site Closure Report 470361 Figures 1 and 2 – installation boundaries before and after proposed surrender of the condensate storage facility. DMS link: [Application Surrender - BX1675IT - Spirit Energy - CSF - Site Closure Report - Dec 2021 Combined.pdf](#)

## 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?**

Note from NPS Senior Permitting Officer for partial surrender EPR/BX1675IT/S010:

Information below is provided in the section 3 (Condition of land at permit issue) of the Site Condition Report 325360-R01 for application to surrender the condensate storage facility (DSM link:

[Application Surrender - Site Condition Report - Barrow Condensate Storage Facility Partial Permit Surrender SCR No Signatures.pdf](#))

- a) Environmental setting including geology, hydrogeology and surface waters – yes - see section 3.1 and Appendix D MGL Borehole Logs, DSM link: [Application Surrender - Site Condition Report - Appendix D.pdf](#)
- b) Pollution history including:
  - pollution incidents that may have affected land - yes – see section 3.2
  - historical land-uses and associated contaminants – yes see section 3.2.1 and Appendix C Envirocheck Report (DMS link: [Application Surrender - Site Condition Report - Appendix C Envirocheck.pdf](#))
  - visual/olfactory evidence of existing contamination - yes see section 3.2.2

## 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?**

- evidence of damage to existing pollution prevention measures – yes see section 3.5
- c) Evidence of historic contamination (i.e. historical site investigation, assessment, remediation and verification reports (where available) – yes – see section 3.2.3 and 3.2.4
- d) Has the applicant chosen to collect baseline reference data? – yes - see section 3.3 and also Appendix E to the Site Condition Report 325360-R01 (DSM link: [Application Surrender - Site Condition Report - Appendix E\\_Application SCR.pdf](#))

Applicants are not necessarily required to collect baseline reference data as part of the application. However, at sites where historic contamination may be an issue, they may choose to establish baseline conditions that can be referred to at surrender. Without this it may be difficult for them to prove that they have not caused the contamination.

Note from NPS Senior Permitting Officer for partial surrender EPR/BX1675IT/S010:  
Area GWCL were consulted regarding the condition of the land at permit issue for the condensate storage facility (variation EPR/BX1675IT/V007). There is a record of the consultation request with attached SCRET ( DSM link: [Application Variation Internal Consultation Request 9861235.msg](#)) and an interim response from GWCL on DSM (DSM link: [Application Substantial Variation Interim GWCL Consultation Response 9866306.msg](#)). There is no record of the final response from GWCL on DSM.

## 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)**

Note from NPS Senior Permitting Officer for partial surrender EPR/BX1675IT/S010:  
Information below is provided in:

- section 4 (Permitted Activities) of the Site Condition Report 325360-R01 for application to surrender the condensate storage facility (DSM link: [Application Surrender - Site Condition Report - Barrow Condensate Storage Facility Partial Permit Surrender SCR No Signatures.pdf](#)), and
- part 1 pages 2-3 of the 2017 Application Site Condition Report provided as Appendix E to the Site Condition Report 325360-R01 (DSM link: [Application Surrender - Site Condition Report - Appendix E\\_Application SCR.pdf](#))

a) Permitted activities

b) Non-permitted activities undertaken at the site

Review summary provided by the applicant and confirm it does give a brief outline of the permitted activities, drawn from other parts of the application and cross-referenced to site plans.

### 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.

Note from NPS Senior Permitting Officer for partial surrender EPR/BX1675IT/S010:

The environmental risk assessment for the application to surrender the condensate storage facility is provided in section 9 (Conceptual Model and Likelihood of Contaminant Release) of the Site Condition Report 325360-R01 for application to surrender the condensate storage facility (DSM link: [Application Surrender - Site Condition Report - Barrow Condensate Storage Facility Partial Permit Surrender SCR No Signatures.pdf](#)).

Review summary provided by the applicant under H1 and confirm if it is an appropriate environmental risk assessment for the site. **Specify what information is needed from the applicant, if any.**

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

(Conceptual model)

Are the activities likely to result in pollution of land?

If Yes, specify what additional controls/checks may be necessary

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?

(This may consist of improved infrastructure, targeted surveillance monitoring by the operator and/or inspections by compliance teams)

Note from NPS Senior Permitting Officer for partial surrender EPR/BX1675IT/S010:

As noted in the SECRET for variation EPR/BX1675IT/V007 for the inclusion of the condensate storage facility in the permit (DSM link: [Application Variation Internal Consultation Request 9861235.msg](#)):

*'The applicant has outlined details of the infrastructure and pollution prevention measures including the following:*

- Tanks connected to a cathodic protection system.
- Tanks of welded steel construction with an outer wall of 200mm thickness.
- Inspection plan in place for the tanks

*However, the following aspect will be considered in more detail during determination:*

- *The tanks do not have secondary containment as they are partially buried with a steel shell encased in concrete.'*

As noted in the decision Document for variation EPR/BX1675IT/V007 for the inclusion of the condensate storage facility in the permit:

*'The operator has provided a description of the condition of the site, which we consider is not satisfactory. The decision was taken in accordance with our guidance on site condition reports.*

*We have included improvement condition 19 in the permit which requires the operator to demonstrate that appropriate secondary containment measures are in place for the condensate storage tanks at the condensate storage facility or put in place alternative condensate storage and handling facilities which meet BAT.'*

The introduction to the consolidated permit issued for variation EPR/BX1675IT/V007 provides additional details:

*'The operator has confirmed that the condensate*

	<p><i>storage facility will cease operation within two years and have proposed a stringent preventative maintenance programme which will be carried out for the remainder of the operational life of the facility. An improvement condition has been included in the permit requiring the operator to either upgrade the tanks to include secondary containment or find an alternative option for condensate storage within two years from variation issue. A pre-operational condition requires the operator to provide detailed plans and operational procedures if the storage and export is to be moved elsewhere within the installation boundary.'</i></p> <p>The consolidated permit issued following variation EPR/BX1675IT/V007 is provided as Appendix B to the Site Condition Report 325360-R01. The DMS link is: <a href="#">Application Variation Notice Issued PDF 10262542.pdf</a></p> <p>From NPS review of the application documents for the current partial surrender (EPR/BX1675IT/S010), there appear to have been no bunds put in place for the tanks prior to cessation of activities. Section 2.1 of the application Site Closure Report states:</p> <p><i>'The facilities/operations at CSF remained largely unaltered between granting of the Environmental Permit in 2017 and the cessation of operations in September 2020.'</i></p> <p><b>NPS are asking Area GWCL to take into consideration the lack of secondary containment for these tanks in their review of the SECRET.</b></p>
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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. <i>(Advise the permitting team on what additional information is needed)</i>	
Pollution of land and water is unlikely; or	
Pollution of land and water is likely <i>(Advise the permitting team on what additional controls/checks may be necessary)</i>	
Historical contamination is present- advise operator that collection of background data may be appropriate	
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.

<b>4.0 Changes to the activities</b> (Source)	
<b>Have there been any changes to the following during the operation of the site?</b>	<b>Response</b> (Specify what information is needed from the applicant, if any)
a) Activity boundaries b) Permitted activities c) "Dangerous substances" used or produced	
<p><u>Note from NPS Senior Permitting Officer for partial surrender EPR/BX1675IT/S010:</u> Information is provided in section 4 (Permitted activities) and section 5 (Changes to activities) of the Site Condition Report 325360-R01 for application to surrender the condensate storage facility (DSM link: <a href="#">Application Surrender - Site Condition Report - Barrow Condensate Storage Facility Partial Permit Surrender SCR No Signatures.pdf</a>) Safety data sheets for dangerous substances used on the site are provided in Appendix G to the Site Condition Report 325360-R01. The DMS link for Appendix G is: <a href="#">Application Surrender - Site Condition Report - Appendix G Safety Data Sheets.pdf</a></p>	
<p>This information will be needed to surrender the permit and should therefore cover all of the land on which any of the activities covered by the permit may take place.</p>	

<b>5.0 Measures taken to protect land</b> 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?	
<p><u>Note from NPS Senior Permitting Officer for partial surrender EPR/BX1675IT/S010:</u> Information is provided in section 6 (Measures taken to protect the land) of the Site Condition Report 325360-R01 for application to surrender the condensate storage facility (DSM link: <a href="#">Application Surrender - Site Condition Report - Barrow Condensate Storage Facility Partial Permit Surrender SCR No Signatures.pdf</a>) Details of the pipeline integrity system (PLIS) relating to the condensate pipeline and tank inspection requirements are provided in Appendix H to the Site Condition Report 325360-R01. The DMS link for Appendix H is: <a href="#">Application Surrender - Site Condition Report - Appendix H Tank Inspection and PLIS.pdf</a> The conceptual model and likelihood of contaminant release over the operational period for the condensate storage facility presented in Section 9 of the Site Condition Report 325360-R01 references the assessment of the likelihood of release to land (Appendix K) and the groundwater investigation report (Appendix I). The DMS links for these appendices are: Appendix I Groundwater and drainage report 325360-R02 <a href="#">Application Surrender - Groundwater and Drainage Report.pdf</a> Appendix K Likelihood of release to land <a href="#">Application Surrender - Site Condition Report - Appendix K Likelihood of Release to Land.pdf</a></p>	
<p>If no, specify why</p>	

<b>6.0 Pollution incidents that may have impacted on land and their remediation</b> To be completed by EM/PPC officers (Sources)	
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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)?

Note from NPS Senior Permitting Officer for partial surrender EPR/BX1675IT/S010:  
Information is provided in section 7 (Pollution incidents that may have impacted on land and their remediation) of the Site Condition Report 325360-R01 for application to surrender the condensate storage facility (DSM link: [Application Surrender - Site Condition Report - Barrow Condensate Storage Facility Partial Permit Surrender SCR No Signatures.pdf](#))

Have all pollution sources associated with the incident been investigated and remediated such that they will not lead to pollution after permit surrender e.g. pipe work containing raw materials?

## 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?

Note from NPS Senior Permitting Officer for partial surrender EPR/BX1675IT/S010:  
Information is provided in section 8 (Soil gas and water quality monitoring) of the Site Condition Report 325360-R01 for application to surrender the condensate storage facility (DSM link: [Application Surrender - Site Condition Report - Barrow Condensate Storage Facility Partial Permit Surrender SCR No Signatures.pdf](#))

Information from groundwater monitoring rounds pre-dating and post-dating the Application SCR in 2017 are provided in Appendix F (Previous Monitoring reports) of the Site Condition Report 325360-R01. The DMS link for Appendix F is: [Application Surrender - Site Condition Report - Appendix F Previous Monitoring Reports.pdf](#)

Groundwater monitoring and drainage water sampling following the condensate storage facility decommissioning activities is reported in Appendix I the Site Condition Report 325360-R01. The DMS link for Appendix I is: [Application Surrender - Groundwater and Drainage Report.pdf](#).

If no, specify why

## 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?

Note from NPS Senior Permitting Officer for partial surrender EPR/BX1675IT/S010:

Information is provided in section 10 (Decommissioning and removal of pollution risk) of the Site Condition Report 325360-R01 for application to surrender the condensate storage facility (DSM link: [Application Surrender - Site Condition Report - Barrow Condensate Storage Facility Partial Permit Surrender SCR No Signatures.pdf](#))

Details of the decommissioning works are provided in Appendix M (Decommissioning supporting documents) of the Site Condition Report 325360-R01. The DMS link for Appendix M is: [Application Surrender - Site Condition Report - Appendix M.pdf](#).

The risk from theoretical residual water contained in the condensate pipeline post cleaning has been assessed as a Detailed Quantitative Risk Assessment (DQRA) which is included as Appendix L to the Site Condition Report 325360-R01. The DMS link for the DQRA is: [Application Surrender - Controlled Waters DQRA report No Signatures.pdf](#). Section 12.1 of the Site Condition Report 325360-R01 concludes that this theoretical residual water represents:

*'a minimal risk to controlled waters in the event that it was to leak from the pipe in the longer term.'*

The DQRA is based on analysis of the pipeline flushing water collected following cleaning and tested for a suite of analytes based on the BAT monitoring requirements for oil and gas refineries presented in Appendix J to the Site Condition Report 325360-R01. DMS link for Appendix J is: Appendix J BAT Conclusions Discharge Limits: [Application Surrender - Site Condition Report - Appendix J\\_BAT Conclusions for refineries.pdf](#)

See also the Site Closure Report 470361 (contains Figures 1 and 2 – before and after installation boundaries). DMS link: [Application Surrender - BX1675IT - Spirit Energy - CSF - Site Closure Report - Dec 2021 Combined.pdf](#)

**All permitted activities should have ceased and all sources of pollution risk should be removed before the Surrender SCR is produced.**



## 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.

[Note from NPS Senior Permitting Officer for partial surrender EPR/BX1675IT/S010:](#)  
Information is provided in section 11 (Reference data and remediation) of the Site Condition Report 325360-R01 for application to surrender the condensate storage facility (DSM link: [Application Surrender - Site Condition Report - Barrow Condensate Storage Facility Partial Permit Surrender SCR No Signatures.pdf](#))

Groundwater monitoring and drainage water sampling following decommissioning activities is reported in Appendix I the Site Condition Report 325360-R01. The DMS link for Appendix I is: [Application Surrender - Groundwater and Drainage Report.pdf](#). Section 12.1 of the Site Condition Report 325360-R01 concludes that these assessments confirm:

- *'groundwater analytical data indicate concentrations of hydrocarbons at all locations were lower than at baseline during either of two sampling visits. All other parameters tested were either not present at concentrations above detection limits or at levels lower than baseline. The groundwater analysis demonstrates that groundwater quality has not deteriorated as a result of activity carried out during the permitted activity*
- *The samples of the water from the three drainage outfalls indicated no exceedances of the BAT criteria for refineries indicating residual water in manhole chambers does not represent an unacceptable risk to Ramsden Dock.'*

Where surrender reference data is needed, applicants will only need to collect this for the measures/areas where they can't show that there has been no change in the condition of the land using the information collected during the life of the permit. Refer to Sections 3 & 4 above.

When assessing whether any baseline reference data is relevant, you must consider whether it relates to the appropriate media (e.g. soil, groundwater, gas) substances and area of the 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?

This section should be used if the operator is relying solely on records obtained during the operational phase of the activity. If no, specify why

**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?

Note from NPS Senior Permitting Officer for partial surrender EPR/BX1675IT/S010:

Information and statement is provided in section 12 (Statement of site condition) of the Site Condition Report 325360-R01 for application to surrender the condensate storage facility (DSM link: [Application Surrender - Site Condition Report - Barrow Condensate Storage Facility Partial Permit Surrender SCR No Signatures.pdf](#)). The summary statement of site condition is provided in section 12.4 and copied below for convenience:

'No further actions are considered necessary all decommissioning work is now complete, the former inventory of chemicals and the associated pollution risk has been removed. Following completion of decommissioning and demolition, the land at CSF and the condensate pipeline is considered to be in a satisfactory condition and suitable for partial surrender.'

If no, specify why

<b>Surrender SCR decision summary</b> To be completed by GWCL officers and returned to NPS	<b>Tick relevant decision</b>
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	SMcD
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	Stuart McDonald 18/08/22