

Application SCR evaluation template

Name of activity, address and NGR	<p>Section 1.1 Part A(1)(a) - Burning any fuel in an appliance with a rated input of 50MW or more in 2 generating units and 2 auxiliary boilers.</p> <p>Section 3.5 B (f) - Pulverised Fuel Ash (PFA) handling and storage.</p> <p>Directly associated activities:</p> <ul style="list-style-type: none"> • Surface water drainage & process effluent. • Water treatment. • The generation and export of electricity. • Fuel storage. • The use of water from the River Severn to condense steam. <p>Site name: Ironbridge Power Station Address: Buildwas Road, Ironbridge, Telford, Shropshire TF8 7BL Centre of partial surrender area: NGR SJ6581703841 Easting 365817, Northing 303841</p>
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Document reference of application SCR	There is no Application SCR. The Application Site Report 2006 is provided as Appendix D to the Application Partial Surrender - Supporting Information report uploaded to DMS on 05/05/2022
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Date and version of application SCR	N/A – partial surrender – see Surrender SCR sections
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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.

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?

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.

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	
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.
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)

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.(Advise the permitting team on what additional information is needed)	
Pollution of land and water is unlikely; or	
Pollution of land and water is likely (Advise the permitting team on what additional controls/checks may be necessary)	
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.

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	
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.	

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?
If no, specify why

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)?
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?
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?

Response from Installations (Regulatory Officer)

The proposal as submitted raises no concerns. However, our final decision on surrender relies on the provision, review and acceptance of the Remediation Verification Report. The final remediation of Zone 5 is not yet complete and no timescales have been provided. It is not clear when the verification report will be available.

The planned remediation targets set out in the proposed Remediation and Verification Strategy are acceptable. These requirements relate to human health and the redevelopment of the land for residential purposes. The results in the final report will be judged against these standards.

One query – on page 64 of the Surrender Report in Section 5.0 'Measures taken to protect land' there is reference to Section 3 of the Site Condition Report Summary. This is not included in the report but would provide relevant information.

The package of permit surrender documents has been reviewed jointly by Installations and GWCL officers (John Bateman and Steve Brown)

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

Notes from NPS Duly making officer:

All permitted activities have ceased and decommissioning works have been undertaken in accordance with a Decommissioning Strategy within the Zone which is the subject of this partial surrender application (Zone 5) as described in the Application Partial Surrender – Supporting Information Report (DMS 05/05/2022).

The Decommissioning Strategy is provided as Appendix J to the Supporting Information Report.

Section 6 of Supporting Information Report summarises results of a Phase 1 Assessment performed in 2021 which is supported by:

- Historic monitoring well and surface water data undertaken in 2017 at 12 locations within Zone 5 and 4 new exploratory holes and
- Further ground investigations in December 2020 and March 2021 including drilling and sampling of new boreholes, excavation of trial pits, collection of soil samples, collection of groundwater samples from historic and new wells, and ground gas monitoring all within Zone 5.

The monitoring, results and controlled waters risk assessment are summarised in section 6 of Supporting Information Report with additional Technical Notes describing further additional monitoring performed in 2021.

Based on the information in section 6 of the Supporting Information Report there were:

- exceedances of standards for 'Residential with consumption of homegrown produce GAC' in soils for
 - arsenic, cadmium, lead and asbestos (see 6.1.49)
 - benzo(b)fluoranthene, dibenzo(a,h)anthracene (see 6.1.54)
- elevated concentrations of some metals and PAHs in groundwater and surface water (see 6.1.69)
- the risks to controlled waters from residual pollution are assessed as low (see 6.1.75)
- there is outstanding work to confirm verification of the removal of tanks associated with a former petrol station believed to have been located in Zone 5 (see 6.1.82)
- there is asbestos present within Shallow Made Ground across Zone 5 (see 6.1.88).

The applicant proposes that remediation work in Zone 5 will be performed as part of the redevelopment of the site for housing by contractors: PJA Civil Engineering Ltd.

The remediation will be in accordance with the PJA Remediation Strategy 2021 submitted as Appendix M to the Partial Surrender Application. An overview of the PJA Remediation Strategy is presented in section 7 of the Supporting Information Report. The strategy and associated documents are available on DMS (see <https://defra.sharepoint.com/:b:/r/sites/EADMSProd2/LIB2/EPR-WP3339QJ/Application%20%26%20Associated%20Docs/Application%20Partial%20Surrender%20-%20Appendix%20M%20-%20004996-RPT-0019%20Ironbridge%20P1%20-%20Remediation%20Strategy%20FINAL%20V4%20-%202031032022.pdf?csf=1&web=1&e=Xy9Zxv>)

Section 7 of the PJA Remediation Strategy 2021 details the standards which will be targeted for redevelopment of the site for residential housing with gardens. The Site Acceptance Criteria (SAC) are set out in table 7.1 of section 7. The SAC assumes cover with clean materials across the final surface in proposed garden and landscaping areas and the SACs therefore apply to materials placed at more than 600 mm below finished external levels.

The PJA Remediation Strategy 2021 includes a validation/verification plan as Appendix C which is summarised in section 8.

The applicant proposes to begin remediation during the partial surrender application determination with the aim that a preliminary decision is made based on the planned remediation targets being acceptable which can then be finalised by us on receipt of the applicant's remediation verification report. This is in accordance with what has been agreed during enhanced pre-application discussions with the Area regulator (Jon Philpin) with sight by Area GWCL (Steve Brown) (see emails uploaded to the Application folder in DMS during Duly Making (uploaded June 2022)). This arrangement allows development of the Zone 5 area to begin during remediation stage and allows actions to address expected discovery of other (historic) contamination to be remediated in parallel with the permit related remediation activities.

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.

Response from the GWCL officer:

After review of the Application Partial Surrender - Supporting Information report from RPS on behalf of Harworth, we agree in principle with the comprehensive assessment presented in this supporting information and in particular to the verification strategy proposed and targets as presented subject to the further comments made below:

The proposal as submitted raises no concerns and allows for a twinning tracking approach with the surrender of the permit in-line more with the planning regime as each phase of the site is progressed. However, this approach relies on the provision, review and acceptance of the Remediation Verification Report which has yet to be provided confirming that the remediation has been carried out and validated as part of this agreement and to our satisfaction that this has been carried out as per the remediation strategy.

We agree in principle with the applicant that they will begin remediation during the partial surrender application determination with the aim that a preliminary decision is made based on the planned remediation targets being acceptable which can then be finalised by us on receipt of the applicant's remediation verification report.

The Application Partial Surrender - Supporting Information from RPS presents a comprehensive assessment of site conditions before the permit was issued and what the state of the land is now. We agree that after all the various phases of site investigation and the other lines of evidence presented such as records of pollution incidents and conditions of site structures that this has identified areas where remedial action is now required during the proposed remediation phase. We are confident from the supporting information that if any unforeseen contamination is found during the remedial phase of works that this will be dealt with appropriately.

The standards set out in the proposed Remediation and Verification Strategy are acceptable. These requirements relate to human health and the redevelopment of the land for residential purposes which will make sure the land is cleaned up to a high standard. The contaminants which have been found onsite appear to be localised in soil and groundwater and it is clear that these areas of concern can be remediated as suggested in the proposed Remediation and Verification Strategy.

Once we are in receipt of the Verification Report for Zone 5 and the work has been carried out as suggested in section 7.2 of the Application Partial Surrender - Supporting Information from RPS we should be at that point in a position to agree the partial surrender of Zone 5. However when that verification report is made available is uncertain and we would request that NPS find out from the applicant what the timescales are for this because this could delay the partial surrender of the permit for Zone 5.

The query John has raised:on PDF page 64 of the Surrender Report in Section 5.0 'Measures taken to protect land' under 'section 9.3 Site Condition Report Summary' there is reference made to a **Section 3** of the Site Condition Report Summary. We cannot find Section 3 in the supporting information anywhere and it doesn't appear to have been included in the report. All the subsequent sections 6, 7, 8, 9 etc rely on this information provided in Section 3. Please can NPS clarify with the applicant what this refers to and where Section 3 can be found?

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.

Notes by Duly Making officer:

See notes in section 8.0 regarding the Remediation and Verification strategy.

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

Notes by Duly Making officer:

See notes in section 8.0 regarding the Remediation and Verification strategy.

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?

If no, specify why

See previous response in under Section 9 above.

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 partially surrender the permit for Phase 1 (Zone 5) ; or	✓
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 Steve Brown, Technical Specialist GWCL, West Mids	01.11.22