

Application SCR evaluation template

Name of activity, address and NGR	Humber Plant, Gibson Lane, Melton, North Ferriby, East Yorkshire, HU14 3HJ. NGR: SE96702565
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Document reference of application SCR	DMS ref: EPR-LP3633AZ Application surrender RFI- Response 3 Site condition report (01/02/2023) <u>Supporting information</u> DMS ref: EPR-LP3633AZ Application Surrender -3379D P2 OMYA North Ferriby Final report 24/11/2022
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Date and version of application SCR	(01/02/2023) SCR Template 31.03.2023 – Updated GWCL Comments
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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

The operator has applied for a full surrender of the permit. The permitted activities involved processing and packing of various magnesia products in powder form. The operator has applied for low risk; however, the area officer has confirmed not low risk.

Due to the nature of the historical land use at the site, it is likely that an intrusive investigation would be required. CAR findings (18/12/2017)

Link to CAR ID: LP3633AZ/0294963 [CAR 27 09 2017 LP3633AZ-0294963 Unprotected 10034192.doc \(sharepoint.com\)](#)

Site plan assessed and seen to be outdated, however not seen as a permit breach since the activities on site were scheduled to cease. CAR findings (03/10/2022)

Link to CAR ID: LP3633AZ/0437541 [Document Management Service - Compliance Site Inspection CAR Form\(03102022\) LP3633AZ-0437541.pdf - All Documents \(sharepoint.com\)](#)

The applicant has submitted a completed SCR template (01/02/2023), as their evidence for the site being in satisfactory condition for surrender, with a Phase 2 Land contamination Risk assessment, and site closure plan as supporting information.

I would appreciate your input to whether you accept this SCR and baseline/background assessment for this surrender.

Link to SCR report and Site closure plan (01/02/2023) [Application Surrender- RFI Response 3 01022023.msg](#)

Link to Phase 2 Land contamination Risk Assessment (24/11/2022) [Application Surrender - 3379D P2 Omya - North Ferriby - 24112022.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?

- 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 applicant has provided a baseline SI report titled - 'AEA Technology report 1995'.

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

Scheduled activities:

Chapter 4 Section 4.2 A (1) D
Production of more than one inorganic chemical
As listed in Table 1.1 of [Permit RP3239WY 8599696](#)

This is an old-style permit, that has been varied twice but these changes have not resulted in any consolidation or update to modern standards.

Other activities listed:

Water discharge to groundwater
Water discharge to sewer

This original permit was then transferred in 2015 [Application - Transfer - Permit Issued \(Word copy\) 8731175.pdf](#)

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.

Risk Assessment (not H1) provided. Phase 2 Land contamination Risk assessment, ref- Application Surrender -3379D P2 OMYA North Ferriby Final report (24/11/2022)

ENVIRONMENTAL RISK ASSESSMENT Summary

Based on the information contained in this report, it is the opinion of Castledine Environmental that the site is moderately contaminated when assessed against a human-health indicative threshold set (used as a baseline for potential impact). When samples are assessed against a commercial-end usage as a baseline, no contaminants are above relevant thresholds.

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	
a- No changes to boundaries b- Permit varied-to allow the venting of the dust extraction units outside the process building when the temperature in the process building requires the use of cooling fans (07/05/02). Permit varied- to include a new emission point to air (MSP5) (19/01/15)	
<p style="color: red;">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>	

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)?
<p>NOTE – GWCL team added in below if helpful?</p> <p>Applicant has stated the following:</p> <p>“Spillage of approx.. 1000kg of Calcium Oxide 17/05/05 Failure of a seal on the storage silo. Spillage contained and cleaned immediately. No evidence of an escape to a pathway or receptor</p> <p>Spillage of approx.. 2000kg of Calcium Oxide 29/08/03 Ruptured tanker discharge valve resulted in spillage. Spillage contained and cleaned immediately. No evidence of an escape to a pathway or receptor”</p> <p>No further evidence has been provided on the ‘cleaning’ methodology or investigation for the two pollution incidents. However, both are unlikely to continue to lead to pollution after permit surrender.</p> <p style="color: red;">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?</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?

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?
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.
Having now received and reviewed the baseline report 'AEA Technology report 1995' and the revised 'Phase 2 Land Contamination Report March 2023', we make the following comment; The baseline data contained in the 1995 report, and the amendments provided in 2023 report indicate that, whilst there is contamination present in the shallow made ground across the site, the contamination was present prior to the permit issue, and the activities covered by the permit have not had a detrimental effect on the site's soils and groundwater. As long as this is the case, we have no objections to accepting the application for the full surrender of the permit.
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?

Evidence of permitting activity's ceasing and decommissioning works complete

As per document 'Omya UK Limited – Humber Plant Site Closure Plan':

'Cessation of Operation

- Production was completed by 30th September 2022.'

Decommissioning

- Decommissioning of all equipment was carried out by specialist contractors. Wherever possible, the work was done within the confines of the buildings to avoid any pollution risk to land or groundwater.'

Evidence of pollution risk removed and land and waters at the site in a satisfactory state

The baseline data contained in the 1995 report, and the amendments provided in 2023 report indicate that, whilst there is contamination present in the shallow made ground across the site, the contamination was present prior to the permit issue, and the activities covered by the permit have not had a detrimental effect on the site's soils and groundwater. As long as this is the case, we have no objections to accepting the application for the full surrender of the permit.

If no, specify why

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 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 31 March 2023 Eleanor Cotterill Phone: 07442 838266 ✉ eleanor.cotterill@environment-agency.gov.uk	