



**Pollution Prevention and Control Act 1999
Industrial Emissions Directive 2010/75/EU
Environmental Permitting Regulations 2016 (as amended)**

Permit Surrender Plan

This document is based on the Environment Agency's H5 Horizontal Guidance on site condition reports to support environmental permit applications, to update the site condition report for the life of the permit and to provide sufficient information at permit surrender

1 Introduction

This document sets out the basic principles for permit surrender planning, and provides information on the steps which may be taken if the treatment activity closes, and associated plant, buildings and structures are decommissioned. The decision on the future of the site, its structures, plant and equipment may change at the time of closure, and this may result in alterations to the overall plan.

Application phase:

Sections 1-3 were submitted with permit application, and were:

1. Site details
2. Condition of the land at permit issue
3. Permitted activities

Operational phase:

Annually, during the life of the permit an 'annual statement of site condition' will be maintained comprising sections 4-7 of H5, including:

4. Changes to the activity
5. Measures taken to protect land
6. Pollution incidents
7. Monitoring results

Surrender phase:

At surrender, this document will be enacted and will form sections 8-10 of H5 including:

8. Decommissioning and removal of pollution risk
9. Reference data and remediation
10. Statement of site condition

A permit surrender application will need to be submitted to the Regulator for approval before the permit can be surrendered. The surrender statement of site condition will describes the condition of the land and groundwater at the point of surrender of the environmental permit. The application must provide the necessary evidence to convince the Council that the site does not pose a pollution risk and is in a "satisfactory state", i.e to return the site of the regulated facility to a satisfactory state, having regard to the state of the site before the facility was put into operation.

This does not mean leaving the site free from all contamination, but free from contamination caused by the operation of the regulated activity. This usually means comparing background concentrations of substances used in the activity in the application site condition or baseline report with samples of the sample pollutants at permit surrender. If the land has deteriorated because of the permitted activities, steps will need to be taken to restore the land to a satisfactory state.

When the Regulator is satisfied that any remaining plant and equipment do not cause an unacceptable risk of pollution or harm to human health or the environment, and that the land is in a satisfactory state, the permit will be approved for surrender.

2 Decommissioning and removal of pollution risk

The decommissioning of the site will have to be undertaken in a systematic way in order to prevent pollution.

Any demolition of the timber treatment vessel and associated plant buildings and structures will be carried out by specialist contractors, who will have provided written method statements and risk assessments that take account of both safety and environmental issues. All work will be subject to company safety and environmental procedures. Work will be carried out in such a way that risks of fugitive releases, such as dust and noise are avoided or minimised as far as is reasonably practicable. Wherever possible materials will be identified for re-cycling and every effort made to minimise landfill disposals.

Documented method statements should include, but not be limited to the following:

1. Site security for the prevention of unauthorised access.
2. Safe removal of preservative concentrates & solution tanks.
3. Isolation of town mains water.
4. Removal of above ground process pipelines.
5. Removal of process vessel(s) and ancillary equipment.
6. Segregation and safe storage prior to disposal of waste materials contaminated with preservative solution.
7. Buildings & structures
8. Electrical systems.
9. Concrete bund retention or removal particularly if the concrete is visibly contaminated with preservative solution.
10. Concrete surfaces retention or removal, particularly if contaminated with preservative solution.
11. Rainwater and other drains disconnected or removed.

3 Reference data and remediation

A significant amount of reference data is likely to be gathered during the operational phase of the activity including:

1. Annual statement of site condition.
2. Changes to the activity or activity boundary.
3. Records of pollution incidents.
4. Effectiveness of measures taken to protect land and groundwater.
5. 6-monthly or 2-yearly groundwater sampling results.

All of the above will have to be considered against groundwater and soil sampling information taken after site decommissioning, thus confirming to the Regulator that the site has indeed been left in a Satisfactory State.

The location, nature and quantity of samples taken should be agreed with the Regulator in order to avoid the need for re-sampling. Particular attention must be paid to sampling methodology and chain of custody of samples taken.

4 Statement of site condition

The statement of site condition or 'Surrender Report' will detail:

1. Decommissioning and removal of pollution risk
2. Reference data and remediation
3. Statement of site condition

4.1 Decommissioning and removal of pollution risk

This section will aim to describe how the site was decommissioned and will aim to demonstrate that all sources of pollution risk have been removed. The report will also aim to describe whether the decommissioning had any impact on the land. Details of any investigation and remediation will be described.

4.2 Reference data and remediation (where relevant)

This section will describe whether further soil and/or groundwater data had to be collected, or reasons why no further sampling was required where the following show that the land has not deteriorated:

- Inspection records and summary of findings of inspections for all pollution prevention measures.
- Records of maintenance, repair and replacement of pollution prevention measures.
- Records of pollution incidents that may have impacted on land.
- Records of their investigation and remediation.

Where additional soil and/or groundwater data needed to be collected, the report will summarise the new data and will say whether the data shows that the condition of the land has deteriorated, or whether the land at the site is in a "satisfactory state". If the land cannot be considered as in a satisfactory state, the report will also summarise what was done to remedy that and confirm that the land is now in a "satisfactory state" at surrender. The report will include details of:

- Land and/or groundwater data collected at application (if collected).
- Land and/or groundwater data collected at surrender (where needed).
- Assessment of satisfactory state.
- Remediation and verification reports (where undertaken).

4.3 Statement of site condition

Using the information from the site closure reporting process including the following information a statement about the condition of the land will be produced:

- Changes to the activity, and measures taken to protect land after cessation.
- Pollution incidents that may have had an impact on land, and their remediation.
- Soil, gas and water quality monitoring.
- Decommissioning and removal of pollution risk.
- Reference data and remediation (where relevant).
- Decommissioning is complete, and the pollution risk has been removed.
- The land is in a satisfactory condition.



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Permit Surrender Report

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Sections 1-3 were submitted with permit application, and include:

1. Site details
2. Condition of the land at permit issue
3. Permitted activities

Annually, during the life of the permit an annual statement of site condition will be maintained comprising sections 4-7 of H5, including:

4. Changes to the activity
5. Measures taken to protect land
6. Pollution incidents
7. Monitoring results

At surrender, this document will be enacted and will form sections 8-10 of H5 including:

8. Decommissioning and removal of pollution risk
9. Reference data and remediation
10. Statement of site condition

8.0 Decommissioning and removal of pollution risk:

Describe how the site was decommissioned. Demonstrate that all sources of pollution risk have been removed. Describe whether the decommissioning had any impact on the land. Outline how you investigated and remedied this.

Checklist of supporting information	➤	Permit surrender plan
	➤	List of potential sources of pollution risk
	➤	Investigation and remediation reports (where relevant)

Summarise information here and reference all relevant reports

9.0 Reference data and remediation (where relevant):

Say whether you had to collect land and/or groundwater data. Or say that you didn't need to because the information from sections 3, 4, 5 and 6 of the Surrender Site Condition Report shows that the land has not deteriorated.

If you did collect land and/or groundwater reference data, summarise what this entailed, and what your data found. Say whether the data shows that the condition of the land has deteriorated, or whether the land at the site is in a "satisfactory state". If it isn't, summarise what you did to remedy this. Confirm that the land is now in a "satisfactory state" at surrender.

Checklist of supporting information	➤	Land and/or groundwater data collected at application (if collected)
	➤	Land and/or groundwater data collected at surrender (where needed)
	➤	Assessment of satisfactory state
	➤	Remediation and verification reports (where undertaken)

Summarise information here and reference all relevant reports

10.0 Statement of site condition

Using the information from sections 3 to 7, give a statement about the condition of the land at the site. This should confirm that:

- the permitted activities have stopped
- decommissioning is complete, and the pollution risk has been removed
- the land is in a satisfactory condition.

Summarise information here and reference all relevant reports