

## Application SCR evaluation template

Name of activity, address and NGR	Barclays Data Centre Barnett Way Barnwood Gloucester GL4 3RU
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Document reference of application SCR	Original Permit Application SCR - "Site Condition Report dated March 2010 (RPS: Reference DLE1992. Final)"  Surrender SCR - EPR/CP3635KA
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Date and version of application SCR	Original Permit Application SCR – March 2010  Surrender SCR - September 2014
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1.0 Site details (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)
Site plans showing site layout, drainage, surfacing, receptors, sources of emissions/releases and monitoring points	Reviewed during original permit decision and our conclusion recorded in decision document was:  "The Applicant has provided a site plan, which clearly shows the regulated facility boundary marked in green. This site plan is shown in Schedule 7 of the Permit. The Agency is satisfied that the plan adequately describes the extent of the regulated facility."

2.0 Condition of the land at permit issue (Receptor)	
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) Environmental setting including geology, hydrogeology and surface waters b) Pollution history including: <ul style="list-style-type: none"> <li>• pollution incidents that may have affected land</li> <li>• historical land-uses and associated contaminants</li> <li>• visual/olfactory evidence of existing contamination</li> <li>• evidence of damage to existing pollution prevention measures</li> </ul> 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?	Reviewed during original permit decision and our conclusion recorded in decision document was:  We consider that the Site Condition Report adequately describes the condition of the site and, in particular, to identify substances in, on, or under the land that may constitute a pollution risk. The Applicant has concluded that the 'likelihood of the risk of pollution is low'. Based on the proposed pollution prevention measures and proposed improvement measures <b>we agree with this conclusion and therefore the collection of baseline reference data to establish the condition of the soil and groundwater prior to commencing operations is not required.</b> The Operator will be required to maintain and update the site condition report submitted with the Application report of

<b>2.0 Condition of the land at permit issue</b> (Receptor)	
<b>Has the applicant provided the following information as required by the application SCR template?</b>	<b>Response (Specify what information is needed from the applicant, if any)</b>
	<p>their in-house Environmental Management System (EMS).</p> <p>Having considered the information provided within the Site Condition Report we are satisfied that appropriate measures are in place for the protection of land and groundwater. This decision was taken in accordance with our guidance on Site Condition Reports.</p>

<b>3.0 Permitted activities</b> (Source)	
<b>Has the applicant provided the following information as required by the application SCR template?</b>	<b>Response (Specify what information is needed from the applicant, if any)</b>
<p>a) Permitted activities</p> <p>b) Non-permitted activities undertaken at the site</p>	<p>Reviewed during original permit decision and our conclusion recorded in decision document was:</p> <p>The Installation is subject to the EPR because it carries out activities listed in Part 1 of Schedule 1 to the EPR:</p> <ul style="list-style-type: none"> <li>• Section 1.1 Part A(1)(a). 'Burning any fuel in an appliance with a rated thermal input of 50 megawatts or more'; and</li> </ul> <p>the following directly associated activities:</p> <ul style="list-style-type: none"> <li>• Raw material storage; and</li> <li>• Storage and disposal/recovery of wastes.</li> </ul> <p>The activities comprise a single installation because all of the unlisted activities are directly associated with, and technically connected to the Listed Activity. The storage of raw materials and the storage / recovery of wastes are directly associated activities as these are necessary for the operation of the specified listed activity and have the potential to cause pollution. Together, these listed and unlisted activities define the legal boundary of the Installation.</p>

<b>3.0(a) Environmental Risk Assessment</b> (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.	<p>Reviewed during original permit decision and our conclusion recorded in decision document was:</p> <p>The Operator has stated that all tanks, associated pipework, bunds, sumps, interceptors and impermeable surfaces will be subject to regular visual inspections and maintained in accordance with the planned preventative maintenance schedule in line with the requirements of the in-house EMS. Based upon the information provided in the application within sections 3.9 –3.16 within Appendix 4 of the Application we are satisfied that appropriate measures are in place to prevent fugitive emissions to air, surface water and ground water.</p>

<b>3.0(b) Will the pollution prevention measures protect land and groundwater?</b> To be completed by EM/PPC officers (Conceptual model)	
Are the activities likely to result in pollution of land?	As 3.0(a) above
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?	As 3.0(a) above

<b>Application SCR decision summary</b> To be completed by GWCL officer and returned to NPS	<b>Tick relevant decision</b>
Sufficient information has been supplied to describe the condition of the site at permit issue; or	Y
Information is missing- the following information must be obtained from the applicant.	
Pollution of land and water is unlikely; or	Y
Pollution of land and water is likely	
Historical contamination is present- advise operator that collection of background data may be appropriate	N – see section 2.0
Date and name of reviewer	Original Permit decision 14/9/11

## Operational phase SCR evaluation template

<b>4.0 Changes to the activities</b> To be completed by EM/PPC officers (Source)	
<b>Have there been any changes to the following during the operation of the site?</b>	<b>Response (Specify what information is needed from the applicant, if any)</b>
a) Activity boundaries b) Permitted activities c) "Dangerous substances" used or produced	No, the permit has never been varied.

  

<b>5.0 Measures taken to protect land</b> (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, site inspected by the Environment Agency on 31/5/12, 14/11/13 and 24/4/14 and no compliance issues were recorded.  Following a request for further information during the surrender determination, the applicant provided the required records in order to demonstrate the effectiveness of their PPM.

  

<b>6.0 Pollution incidents that may have impacted on land and their remediation</b> (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)?	The operator has confirmed that there have been no spillages on site during the operation of the facility, and confirm that they had no records of incidents during the decommissioning operations.

  

<b>7.0 Soil gas and water quality monitoring (where relevant)</b>	
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?	We did not require baseline data being collected at the time of issue of the permit. No data has been collected as part of the surrender application, on the basis of no spillages and the site containment measures being inspected and well maintained.

## 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

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?

Decommissioning began at the site in 2013 and was completed in Q3 2014. The plant decommissioned is as follows:

- 1 x block A dual fuel boiler
- 5 x block B natural gas boilers
- 5 x block C gas oil generators

Whilst this plant has not been removed from site, they have disconnected from the control systems, physically disconnected from fuel lines, have had their batteries removed and all engine fluid and air filters removed.

Consequently it would be difficult for the operations to re-commence operations on these items and polluting materials have been removed.

The decommissioning of A and B boilers was completed on 1/10/13 and was noted by the Environment Agency during our 14/11/13 visit.

The second phase decommissioning works involved the disconnection of the 5 block C generators. The decommissioning plan and evidence of its completion have been provided in the surrender application.

The Environment Agency inspected the site on 6/8/14 and confirmed that the actions in the decommissioning report for block C had been completed.

A copy of the operator's internal engineering site report to review site decommissioning operations dated 14/8/14, confirms that all generators can not run, no spillages occurred, pollution risks fully removed and no pollution risk remains.

## 10.0 Statement of site condition

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?

Section 10 of site condition report summary dated 18/9/14 states:

Combustion generation capacity is now below 50MWth, pollution risk removed and no records of any spills.

Also, states that the site has not deteriorated during the operation of the permitted activities on site. This is due to the site being covered with concrete hard standing with suitable drainage control mechanisms. They state that the containment has been maintained to the highest standard, and highly comprehensive records are in place.

Section 8 above gives details of decommissioning records.

Section 4.12.1 of surrender report states they have a planned preventative maintenance programme (PPM). This includes twice daily checks of storage, plant and equipment, and inspection of all tanks on a weekly, monthly, 6 monthly and yearly basis. The maintenance schedules are generated from their MYMCS electronic PPM system, and all records are available via this system.

Following a request for further information, the applicant provided the required records in order to demonstrate the effectiveness of their PPM.

The operator's internal engineering site report to review site decommissioning operations dated 14/8/14, confirms there is a full record of the PPM being employed at all times.

## 9.0 Reference data and remediation (where relevant)

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.

Not applicable, no reference data collected

<b>10.0 Statement of site condition</b>	
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

<b>Surrender SCR decision summary</b>	<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	Yes
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	S Paterson NPS Permitting Officer 20/10/14