

**P-WAS-A1S**

**The Environmental Authorisations (Scotland) Regulations 2018 (EASR)**

**Waste Permit Surrender Form:**

**Storage, treatment and recovery of waste**

Version 1.0

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Contents

[How to use this waste permit surrender form 3](#_Toc198196217)

[Before you apply 4](#_Toc198196218)

[How to apply 4](#_Toc198196219)

[Section 1 - Permit details 5](#_Toc198196220)

[1.1 Permit reference 5](#_Toc198196221)

[1.2 Authorised place details 5](#_Toc198196222)

[Section 2 - About your proposed surrender 6](#_Toc198196223)

[2.1 Non-technical summary 6](#_Toc198196224)

[2.2 Surrender in whole or in part 7](#_Toc198196225)

[Section 3 - Surrender in part 8](#_Toc198196226)

[3.1 Activities to be surrendered 8](#_Toc198196227)

[3.2 Reducing the boundary of the authorised place 8](#_Toc198196228)

[3.3 Proposed surrender in part details 9](#_Toc198196229)

[3.4 Updated plans and documents for surrender in part 10](#_Toc198196230)

[Section 4 - Surrender report 11](#_Toc198196231)

[4.1 Baseline assessment 11](#_Toc198196232)

[4.2 Surrender report requirements 11](#_Toc198196233)

[Section 5 - Contamination assessment report 14](#_Toc198196234)

[Appendix 1 - Contamination assessment report guidance 16](#_Toc198196235)

[Section A - Desk-based assessment and conceptual site model 17](#_Toc198196236)

[Section B - Intrusive site investigation and/or environmental monitoring 19](#_Toc198196237)

[Section C - Risk assessment 20](#_Toc198196238)

[Section D - Remedial works 22](#_Toc198196239)

[Section E - Statement of the current condition of the authorised place 22](#_Toc198196240)

If you would like this document in an accessible format, such as large print, audio recording or braille, please contact SEPA by emailing [equalities@sepa.org.uk](mailto:equalities@sepa.org.uk).

## How to use this waste permit surrender form

Use this form to apply for a surrender of a permit that authorises waste activities under the ‘Storage, treatment, and recovery of waste’ category.

A different surrender form is required if you are applying to surrender any of the following waste activities:

* Treatment of waste for the purpose of remedial action with respect to land or the water environment (mobile plant)
* Recovery of waste by application to land for the purpose of soil improvement
* Restoration of open cast coal sites

The ‘Storage, treatment, and recovery of waste’ category includes the following waste activities:

* Transfer station
* Civic amenity site (or Household waste recycling centre)
* Storage and treatment of waste which includes the operation of a Material Facility (MF) subject to the statutory Code of Practice
* Storage and treatment of waste motor vehicles
* Use of waste in construction, restoration, reclamation, and land improvement projects
* Composting
* Anaerobic digestion
* Ship dismantling recycling
* Decommissioning of offshore structures
* Other storage and treatment of waste

## Before you apply

* Check your permit to identify the type of authorised activities (e.g. water, waste, industrial activities).
* Use the correct surrender form for the type of activity you want to surrender. For example, use the water surrender form to surrender a water permit activity, the waste surrender form to surrender a waste permit activity, or the appropriate surrender form for other activities.
* Where you see the term ‘document reference’, enter the document reference(s) for the information you have provided. These must be submitted along with the completed form.
* For applications made with insufficient or inadequate information; we will return these to the applicant with an explanation of what additional information is required and may retain part of the application fee in accordance with our published charging scheme.

## How to apply

**Email application (preferred)**

* Send your completed application to [registry@sepa.org.uk](mailto:registry@sepa.org.uk).

**Post application (slower processing)**

* You can also send your application by post, but please note it may take longer to process.
* The postal address is provided in the APP-GEN3 form.

**What to include in your application**

* A completed APP-GEN3 form
* Completed surrender form(s)
* Any required supporting information

**Where to get the forms**

* You can download [APP-GEN3 and surrender forms](https://www.sepa.org.uk/easr) from our website.

## Section 1 - Permit details

### 1.1 Permit reference

Please provide the reference of the permit you wish to surrender.

| **Permit reference** (e.g. EAS/P/1234, WML/L/1234567) |
| --- |
|  |

### 1.2 Authorised place details

Please provide the following information about the authorised place.

**Table 1: Authorised place details**

| **Question** | **Answer** |
| --- | --- |
| **Authorised place name** |  |
| **Authorised place address** |  |
| **Authorised place postcode** |  |
| **National Grid Reference (NGR)**  (At least 2 letters followed by 8 digits, e.g. AB 1234 6789. You can use our [SEPA NGR Tool](https://map.sepa.org.uk/ngrtool/) to find your NGR.) |  |

## Section 2 - About your proposed surrender

### 2.1 Non-technical summary

Please provide a non-technical summary of your application, including:

* A brief overview of the proposed surrender.
* A summary of the activities carried on under the authorisation.

This summary may be published on our website as part of the public consultation process. Ensure it is written in simple and plain language so that all members of the public can clearly understand the details of your application.

| **Document reference** |
| --- |
|  |

### 2.2 Surrender in whole or in part

Please select only one box to confirm the type of surrender, then proceed to relevant section.

#### Surrender the whole permit

The activities and the whole authorised place associated with the existing permit will be surrendered.

#### Note: If the permit also authorises water or industrial activities, you must submit a separate surrender form for each of those activity types to surrender the whole permit.

(proceed to Section 4)

#### Surrender part of the permit

#### I am applying to reduce the boundary of the authorised place. (proceed to Section 3)

#### The permit authorises multiple activities, and I am applying to surrender:

#### some of the waste activities without reducing the boundary of the authorised place.

#### (proceed to Section 3)

#### The permit authorises multiple activities, and I am applying to surrender:

#### some of the waste activities, and

#### reduce the boundary of the authorised place.

#### (proceed to Section 3)

## Section 3 - Surrender in part

If you are applying to surrender part of the permit, please complete the relevant sections below.

### 3.1 Activities to be surrendered

If you are applying to surrender some of the activities authorised by your permit, please provide details of the waste activities you wish to surrender in the table below.

**Table 2: Waste activities to be surrendered**

| **Waste activities to be surrendered** | **Waste activity description** |
| --- | --- |
| **Activity 1** |  |
| **Activity 2** |  |
| **Activity 3** |  |
| **Activity 4** |  |
| **Activity 5** |  |

### 3.2 Reducing the boundary of the authorised place

If your application to surrender the permit in part reduces the boundary of the authorised place, you must provide two location plans.

The location plans must:

1. Limit the boundary of the authorised place strictly to the extent of the activities.
2. Be based on an Ordnance Survey (OS) map.
3. Be clear and easy to read on an A4 page, avoiding unnecessary details.
4. Include a defined scale, the date it was created, a north direction indicator, and context such as roads and buildings.

The plans required are:

* **Location plan 1** - A location plan that clearly outlines and identifies the area within the existing authorised place to be surrendered.

| **Document reference** |
| --- |
|  |

* **Location plan 2** - A location plan that clearly outlines and identifies the new boundary of the existing authorised place, reflecting the surrender of the area shown in Location plan 1.

| **Document reference** |
| --- |
|  |

### 3.3 Proposed surrender in part details

For surrender in part, please provide the following information:

* The reason why you are applying to surrender part of the permit.
* An indication of any variations to the permit conditions resulting from the surrender in part.
* A description of the changes in operations due to the surrender in part.
* An indication of the changes to any plan or document that forms part of the permit.
* Details of any changes to the waste quantities, including the maximum storage limits and annual waste quantities for each waste stream stored and treated at the authorised place after the surrender in part.

| **Document reference** |
| --- |
|  |

### 3.4 Updated plans and documents for surrender in part

If your proposed surrender in part requires changes to any existing plans or documents (e.g. the written management system, infrastructure plan, odour management plan), you must submit the new or revised version with your application.

The updated plans or documents must:

* Clearly reflect the changes proposed in your application.
* Address any new or modified operational or environmental factors resulting from the proposed surrender in part.
* Demonstrate how you will continue to comply with the relevant permit conditions.

Ensure the plans and documents are clear and include any supporting information necessary to explain the proposed surrender in part.

Please provide the names of the plans and documents and their corresponding references in the table below.

**Table 3: Updated plans and documents**

| **Document name**  (e.g. written management system, infrastructure plan) | **Document reference** |
| --- | --- |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |

## Section 4 - Surrender report

You must submit a surrender report to surrender a permit (in whole or in part). This report is critical for SEPA to effectively assess and determine your application.

The information required will vary depending on the level of pollution risk. This depends on factors such as waste types, activities carried on, infrastructure (drainage systems, surfaces, containment), etc.

### 4.1 Baseline assessment

If you have previously completed a baseline assessment, this will be a useful reference for compiling a surrender report. Please include a copy of the baseline assessment if available.

| **Document reference** |
| --- |
|  |

### 4.2 Surrender report requirements

The surrender report must include the following details:

1. **Activities history**

Describe any activities that were carried on before the permit was issued (if known).

1. **Waste activities**

List all waste activities (treatment, storage, disposal) you wish to surrender, including the types and quantities of waste handled and their locations.

1. **Operational dates**

Provide approximate start and end dates for the waste operations.

1. **Plans**

Include plans showing all waste activities, highlighting areas where hazardous waste (e.g. asbestos, waste oils) was stored or managed. Note any changes to the location of activities over time.

1. **Surface details**

Describe all surfaces (e.g. concrete, tarmac, hardstanding), including information on their condition (still impermeable, cracked, etc.), installation dates, and maintenance details. Provide concrete specifications, if known, and photos (past and present, if available).

1. **Drainage**

Include drainage plans, oil interceptor details, and maintenance frequency. Note any changes over time.

1. **Non-conforming waste**

Explain how any non-conforming waste was handled and where it was stored pending removal.

1. **Spillages and pollution**

Detail how spillages or pollution events were managed and any contingency measures that were in place**.**

1. **Authorised place clearance**:

* State if all equipment, waste, and substances associated with the waste activity have been removed.
* Highlight any evidence of contamination on the ground within the authorised place boundary (e.g. oil spills).
* Highlight any ongoing emissions that require active management (e.g. surface water, site drainage, or measures to minimise odour, gas, dust or litter). Include photos where possible.

1. **Compliance issues**

List any permit breaches and provide SEPA compliance/inspection reports, if available.

1. **Monitoring**

Provide a summary of any monitoring carried out under the permit.

1. **Discharges**

State if there were any discharges to the water environment or sewer. Provide authorisation details from SEPA or Scottish Water.

1. **Future plans**

Share any known future plans for the place.

1. **Waste removal confirmation**

Confirm that all waste has been removed from the area being surrendered and include supporting evidence (e.g. photos, notes).

1. **Subsistence fees**

Confirm all subsistence fees have been paid in full.

1. **Environmental incidents**

Describe any environmental incidents and how they were managed or resolved.

1. **Data returns**

Provide data returns relating to the activities you wish to surrender, up to the date of the surrender application.

| **Document reference** |
| --- |
|  |

We may ask for additional information if needed to process your surrender application.

Section 5 - Contamination assessment report

You must submit a contamination assessment report if you are applying to:

* Surrender the whole permit – In this case, the report should cover the whole authorised place.
* Surrender part of the permit to reduce the boundary of the authorised place – In this case, the report should cover the area of land to be removed from your permit.
* Surrender part of the permit to reduce the number of waste activities – In this case, the report should cover the impact of the activities you wish to remove from your permit.

The contamination assessment report will help SEPA assess any environmental impact caused by the regulated activity and determine your application.

If environmental harm has occurred, you must demonstrate that all reasonable steps have been taken to restore the environment affected by the activity to a satisfactory state.

#### Contamination assessment report requirements

The contamination assessment report must include the following information:

1. Desk-based assessment to develop a conceptual site model identifying any relevant source-pathway-receptor linkages.
2. Results from any intrusive site investigation and/or environmental monitoring (if applicable).
3. An assessment of risks to human health and the environment (if applicable).
4. Details of any remedial works carried out to restore the environment affected by the activity (if applicable).
5. A summary statement of the current condition of the authorised place at the time of the surrender application.

For further details on contamination assessment report requirements, refer to the guidance in Appendix 1.

We recommend consulting SEPA before starting any site work to confirm the scope of any proposed intrusive site investigation or environmental monitoring.

For facilities or waste activities considered to have a low risk of contamination, a detailed intrusive site investigation or sampling may not be required. However, you must provide a justification for why you believe an intrusive site investigation or sampling is not necessary.

Please note, SEPA may still require a site investigation or sampling if we believe it is necessary to assess the impact on the environment from the activity.

Please provide your contamination assessment report, or justification why it is not required.

| **Document reference** |
| --- |
|  |

## Appendix 1 - Contamination assessment report guidance

Any site characterisation, including intrusive investigation and environmental monitoring, should follow relevant industry standards and guidance, including:

* BS5930:2015+A1:2020 - Code of practice for ground investigations
* BS10175:2011+A2:2017 - Investigation of potentially contaminated sites - Code of practice
* BS EN ISO 5667 series - Water quality - Sampling
* BS EN ISO 18400 series - Soil quality
* BS 8576:2013 - Guidance on investigations for ground gas. Permanent gases and Volatile Organic Compounds (VOCs)

When designing a sampling programme, careful planning is important since contaminants may not be evenly spread across the authorised place. Samples should be collected in enough quantity and from suitable locations to provide an accurate picture of the land’s condition and identify where contaminants might be present.

Wherever possible, samples should be analysed using both accredited laboratories and accredited methods, e.g. UKAS ISO 17025 or similar.

The field monitoring and/or laboratory analysis of soil, ground gas, surface water, and/or groundwater should include:

* Contaminants which you reasonably expect to be present.
* Potential daughter products derived from degradation of the original contaminants.
* Relevant supporting parameters required to characterise site-specific contaminant behaviour (e.g. in relation to mobility, bioavailability or degradation).

The timing and duration of environmental monitoring should take into account the likelihood of seasonal or other temporal trends. If there is any evidence of pollution caused by non-waste related activities at the authorised place or neighbouring sites, include this information. This may help us to discount these sources during the assessment of your application.

SEPA recommend using the guidance below when preparing the contamination assessment report to ensure the relevant information is included.

### Section A - Desk-based assessment and conceptual site model

The contamination assessment report must include a desk-based assessment to develop a conceptual site model (CSM) that identifies any relevant source–pathway–receptor linkages.

The following information should be included:

1. **Summary of potential sources and contaminants of concern** 
   * Base this on the findings of the surrender report
   * Focus on contaminants associated with waste activities

This informs the CSM, scope of any site characterisation work, and risk assessment.

1. **Surrounding land uses** (e.g. residential, agricultural)
   * Identify potential receptors for the CSM
   * To support the identification of possible off-site sources of contamination
2. **Historical activities in the vicinity of the authorised place**
   * Use historical maps and other evidence
   * To enable the assessment of potential off-site contamination sources
3. **Geology**

To identify potential contaminant pathways in the CSM, include details on:

* + - Artificial (made) ground
    - Natural superficial deposits
    - Bedrock
    - Mining activity (if applicable)

1. **Water environment**

To help identify both pathways and potential receptors in the CSM, provide information on:

* + - Groundwater
    - Surface waters
    - Coastal waters (if applicable)
    - Wetlands
    - Water abstractions

1. **Designated sites** (SSSI, SAC, SPA, or a RAMSAR site)

* Identify sensitive environmental receptors that should be considered in the CSM

1. **Baseline assessment or monitoring data** (if available)

* To support consideration of any historical contamination not linked to authorised activities

1. **Initial conceptual site model (CSM)**

* Develop a CSM that identifies any relevant source–pathway–receptor linkages
* Clearly highlight any areas of uncertainty
* Use the CSM to determine if further intrusive site investigation or monitoring is needed
* Use the CSM to support the assessment of the sensitivity of identified receptors

### Section B - Intrusive site investigation and/or environmental monitoring

Based on the CSM’s findings, additional intrusive site investigation or monitoring may be required to assess any environmental impacts from the regulated activity.

If additional intrusive site investigation or monitoring is required, the contamination assessment report must include:

1. **Scope of intrusive site investigation and/or environmental monitoring**  
   You should explain how your proposed intrusive site investigation and/or monitoring is adequate for characterising the authorised place based on the CSM.

Include justifications for:

* Type(s) of intrusive site investigation/monitoring
* Number and locations of exploratory holes/monitoring points, including any access constraints
* Number and locations of samples
* Analytical suites
* Monitoring frequency and duration

Note: It is strongly recommended to consult SEPA before starting any site work to ensure the proposed investigation/monitoring is appropriate.

1. **Summary of intrusive investigation and/or monitoring findings**   
   This section should help characterise ground conditions and identify current levels of contamination to inform the risk assessment. Please include information on:

* Geology and soil
* Groundwater
* Surface waters
* Ground gases
* Contaminant concentrations and trends

You must also include:

* A plan showing the locations of exploratory holes and/or monitoring points
* Exploratory hole logs
* Geological cross-sections (if applicable)
* Field monitoring records
* Laboratory testing certificates

Note: In some cases, you may need to carry out more than one phase of investigation or monitoring. This might happen if the initial results show that ground conditions differ significantly from what was expected or if further work is needed to define the extent of any contamination hotspots.

### Section C - Risk assessment

A risk assessment will use the results from intrusive site investigations or monitoring to assess whether any contamination at the proposed authorised place poses a risk to human health or the environment.

If a risk assessment is required, your report should include the following:

1. **Updated conceptual site model (CSM)**

Provide an updated CSM identifying:

* Sources of contamination
* Pathways through which contamination could spread
* Receptors that could be affected

You should also highlight any areas where there is still uncertainty.

This updated CSM will help identify any remaining pollutant linkages that may require further risk assessment. You may also want to consider how sensitive the different receptors are to contamination.

1. **Initial screening against generic assessment criteria**

Compare your findings with generic assessment criteria for:

* Human health
* The water environment
* Any other relevant receptors identified in the CSM

Justify your choice of assessment criteria and explain if risk assessment is not relevant for a particular receptor.

This step helps to identify any potential residual contaminants or pollutant linkages that may need a more detailed site-specific risk assessment.

1. **Detailed Quantitative Risk Assessment (DQRA) for human health and water environment**

If the initial screening shows there could still be a risk, a Detailed Quantitative Risk Assessment (DQRA) for human health and water environment should be carried out.

You should include justification for:

* Modelling approach
* Model input parameters
* Choice of assessment points

This helps to assess in detail any residual contamination risks and inform the statement of the current condition of the authorised place.

### Section D - Remedial works

If remedial works were carried out to restore the environment affected by the activity to a satisfactory state, include the following information:

1. **Summary of remedial works**

* Provide a summary of any remedial works carried out before submitting your surrender application.
* Confirm whether these works were completed before or after the site characterisation investigations.

1. **Validation report for remedial works**

Provide a validation report that explains:

* The number and location of monitoring or sampling points, including any significant access constraints
* The number and location of samples
* The range of substances tested for (analytical suites)

### Section E - Statement of the current condition of the authorised place

You must provide a summary statement describing the current condition of the authorised place.

This statement should demonstrate that the authorised place meets the criteria for surrender and that environmental harm arising from the carrying on or the cessation of the activity has been prevented, and/or the environment affected by the activity has been restored to a satisfactory state.

Your statement should be justified with reference to:

* Any remaining risks to human health or the environment
* Any areas of uncertainty that have not been fully resolved

This information will help confirm that the authorised place is in a suitable condition to be surrendered.