

## Site Protection and Monitoring Programmes (SPMPs)

A Site Protection and Monitoring Programme (SPMP) demonstrates that the pollution prevention measures designed to protect the land at the site are effective throughout the life of an installation.

A SPMP design document must be submitted to the Environment Agency within two months of receipt of a Permit. This document should provide a framework for any investigations to collect reference data. Template designs which clearly set out the Agency's expectations for reporting are available and HFL Risk Services would be happy to provide advice and assistance in the development of your company's SPMP document.

The purpose of a SPMP is to:

- Ensure (as far as is practicable) that pollution prevention measures are sufficient to prevent the emission of pollutants to land
- Demonstrate and maintain the effectiveness of the pollution prevention measures at the site throughout the life of the installation
- Ensure adequate maintenance, inspection and testing of infrastructure to demonstrate its effectiveness throughout the life of the installation
- Where necessary, collect reference data for substances in use at the installation for which pollution is ongoing or where there is a reasonable possibility of such pollution occurring

- Where necessary, monitor land and/or groundwater to ensure pollution prevention measures are effective and to provide warning of the failure of pollution prevention measures
- Record the results of the above to demonstrate that the land at the installation is in a satisfactory state for the purposes of surrendering a Permit

### SPMP Implementation

Once you have received your Environmental Permit and submitted your SPMP design report, it is most likely that you will be required to continually monitor your site to ensure that the pollution prevention measures you have put in place continue to be effective. We work with a number of specialist subcontractors to provide soil drilling, sampling and analytical testing to meet the requirements of the Regulations and will make recommendations for remediation should this be necessary.



## Integrated Pollution Prevention and Control

Anyone who has ever been through the process of applying for an Integrated Pollution Prevention and Control (IPPC) Permit, now known as an Environmental Permit, will tell you that it is an exceedingly complex and time-consuming activity.

The Regulator has been very proactive in delivering direction and advice for the application process, but the sheer volume of information and the difficulty in keeping up-to-date with the frequent amendments can be bewildering, particularly for new entrants.

### How We Can Help

At HFL Risk Services, we have an enviable track record in the preparation of Environmental Permit applications across a range of industries. We can provide different levels of support ranging from the acquisition of data to the successful presentation of the application to the Regulator.

We are happy to support our clients, if necessary, in any presentations and discussions required by the Regulator in pre and post issue of the Permit.

### Ask us about:

- Environmental Permit applications
- Application Site Reports
- Improvement programmes
- BAT reviews
- Site Protection and Monitoring Programmes
- Air dispersion modelling
- Environmental impact assessments
- Intrusive investigations

## INTEGRATED POLLUTION PREVENTION AND CONTROL

### Do I Need an Environmental Permit?

The Environmental Permitting (England and Wales) Regulations 2007 apply to industry sectors for energy, metals, minerals, chemicals, waste management and a group of other activities such as textile treatment, food production and the intensive farming of pigs and poultry.

In order to gain an Environmental Permit, operators have to illustrate how they are applying the Best Available Techniques (BAT) to prevent and control pollution. They must also meet other sector specific requirements, taking account of local factors.

### Preparing Environmental Permit Applications

For clients who are not fully conversant with environmental permitting, we generally propose an interactive gap analysis study to assess what needs to be done and to provide them with a real understanding of the application process, the issues at stake and what is required of them. We will review current management systems, standards and procedures relating to the design and operation of facilities at the site and produce an assessment record. From this, a gap analysis report is produced, providing detailed information about any work required to fulfil the requirements of the Regulations, together with an execution plan for the preparation of the application itself. We can then prepare the application on your behalf or we can guide you through the process, providing specialist support as required.



### Application Site Reports (ASR)

The principal objective of the ASR is to provide information on the ground conditions of the site to enable the Regulator to set appropriate Permit conditions to protect the land. A completed ASR must:

- Identify the environmental setting and pollution history of the installation
- Identify any substance in, on or under the land that could have arisen from materials currently used or produced by the activities under the Permit (or are likely to be used or produced in the future)
- Identify preventative measures that are in place to protect the land
- Be sufficient to form the basis of the operator's Site Protection and Monitoring Programme (SPMP)

### Desk Based Reviews

We can undertake desk-based research and site reconnaissance on your behalf to enable the collation and review of all readily available information concerned with the site for the ASR. This is then used to develop a conceptual model of the site.

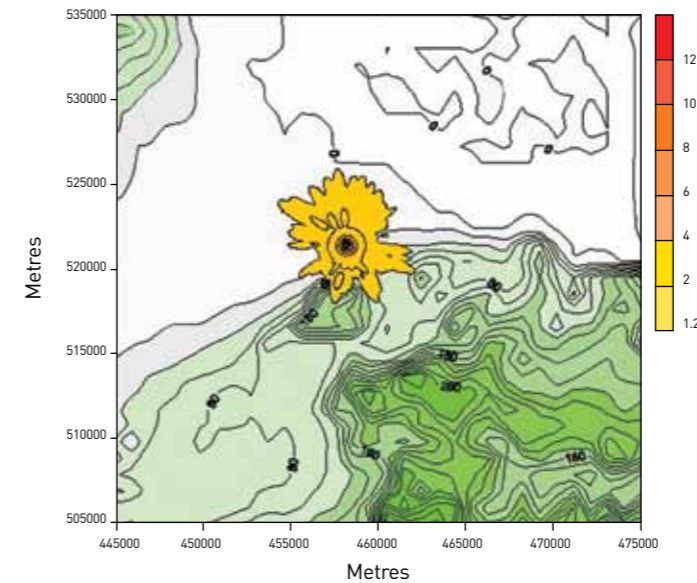
### Conceptual Site Model (CSM)

We use the information collated as part of the desktop review to produce a Conceptual Site Model (CSM). This is a descriptive representation of the key source of areas of contamination, migration, pathways and receptors. It also includes an assessment of the likelihood of adverse impacts to on and off-site receptors. The CSM is required regardless of whether you have made the case that there is little likelihood of pollution or not.

## INTEGRATED POLLUTION PREVENTION AND CONTROL

### Air Dispersion Modelling

We are able to carry out atmospheric dispersion modelling from point sources to model the movement of known pollutants across all terrains. The method employed allows accurate definition of the boundary layer conditions and accounts for a skewed Gaussian distribution under convective (unstable) conditions. We are also able to assess the maximum impact of point sources during both average and worst-case conditions.



Air Dispersion Modelling Plot