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Dunton Technologies Limited

Date

November 2022

Project Number

1620013520-002

BRIDGE STREET NORTH, SMETHWICK WASTE TREATMENT FACILITY SITE CONDITION REPORT



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Project No. **1620013520-002**

Issue No. 1

Date 08 November 2022

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INTRODUCTION

Ramboll UK Limited ("Ramboll") was commissioned by Dunton Technologies Limited ("Dunton", the "Operator" or the "Client") to provide environmental permitting support in relation to the operation of a proposed waste treatment facility located at Bridge Street North, Smethwick, B66 2BZ (the "facility" or the "site").

This Site Condition Report (SCR) is intended to satisfy the Environment Agency's (EA's) request for such a report as part of the application for an Environmental Permit and has been developed following the guidance and template provided in the EA's Guidance for Applicants (H5) – Site Condition Report document.

General Limitations

The information provided in this SCR is based upon the findings of third-party investigations and published data. In performing its assignment, Ramboll UK Limited must rely upon publicly available information, information provided by the Client and information provided by third-parties. Accordingly, the data presented are valid only to the extent that the information provided to Ramboll was accurate and complete. This SCR is not intended as legal advice, nor is it an exhaustive review of site conditions or facility compliance. Ramboll UK Limited makes no representations or warranties, express or implied, about the condition of the site.

Ramboll scope of work for this assignment did not include collecting samples of any environmental media. As such, this review cannot rule out the existence of latent conditions.

1. SITE DETAILS

1.0 Site Details	
Name of the applicant	Dunton Technologies Limited
Activity Address	Bridge Street North, Smethwick, B66 2BZ
National Grid Reference	490539, 276119
Document reference and dates for Site Condition Report at permit application and surrender	Site Condition Report at Permit Application: 1620013520- 002_Bridge Street North Site Condition Report, prepared by Ramboll UK Limited, November 2022
Document references for site plans (including location and boundaries)	 Appendix 1 - Site Location - 1620013520-002 Issue 1, Figure 1 Appendix 1 - Revised Site Layout Plan - Drawing ref. RAM-ZZ-ZZ-DR-C-00008, Revision P04 Appendix 1 - Drainage Layout Plan - Drawing ref. 102201/100, Revision B

2. CONDITION OF THE LAND AT PERMIT ISSUE

The table below provides a description of the site's environmental setting from a review of publicly available information and previous third-party site investigation reports.

Table 2-1: Environmental Setting

Conditions	Source / Supporting Information	Description
Geology	British Geological Society (BGS) website, accessed November 2022 www.bgs.ac.uk	Information on the geology underlying the site and the area surrounding the site was obtained from electronic mapping, publicly available borehole records on the British Geological Society (BGS) website, and a third-party site investigation report.
	TJC Environmental, November 2022, Phase 1 and 2 Geo- Environmental	The mapping indicates that the site is site is directly underlain by superficial Glaciofluvial Deposits (sand and gravel), which is further underlain by bedrock geology of the Kidderminster Formation (sandstone).
	Assessment (ref. 10143)	The 2022 TJC site investigation identified the following ground conditions:
		Made Ground was identified across the site from ground level to depths of between 0.8 m below ground level (bgl) to 4.25 m bgl. Concrete slabs were present in every borehole location, and the underlying strata comprised dark brown to black very gravelly sand with frequent cobbles of brick. Gravel was observed to be fine to coarse angular to rounded ash, clinker, brick, concrete and quartzite. Cobbles were observed to be angular brick. Made Ground was also identified as very soft to soft brown slightly gravelly very sandy clay. Gravel was fine to coarse subrounded to rounded quartzite.
		 Glaciofluvial Deposits were identified beneath the Made Ground from depths of 1.7 m bgl to >5.45 m bgl (final depth of borehole). The strata was encountered as firm to stiff orange brown slightly sandy very gravelly clay. Gravel was coarse subangular to rounded quartzite. The strata was also identified as brown to orange brown very gravelly slightly to very clayey sand. Gravel was fine to coarse rounded quartzite.
Hydrogeology	Aquifer designation mapping available at www.magic.gov.uk, accessed November 2022 TJC Environmental, November 2022,	The Aquifer Designation mapping indicates the superficial Glaciofluvial Deposits underlying the site are designated as a Secondary A Aquifer. Secondary A Aquifers are defined as permeable layers with potential to support localised abstractions. The underlying bedrock geology of the Kidderminster Formation is classified as a Principal Aquifer, which is defined as highly permeable with significant water storage, able to
	Phase 1 and 2 Geo- Environmental Assessment (ref. 10143)	support large abstractions. The underlying Groundwater body is the Tame Anker Mease Permo-Triassic Sandstone (Birmingham Lichfield) Water Body, designated as being of 'poor' chemical and 'poor' quantitative status under the Water Framework Directive classification scheme in 2019.
		The site is located within groundwater Source Protection Zone 3 (Total Catchment), which is defined as the area

Conditions	Source / Supporting Information	Description
		around a supply source within which all the groundwater ends up at the abstraction point.
		According to the Groundsure report procured by TJC Environmental (dated August 2022), there are no active licensed groundwater abstractions within a 1 km radius of the site. There are no licensed groundwater abstractions for potable water supply within a 2 km radius.
		During the 2022 TJC Environmental investigation, no groundwater was encountered in any of the eight exploratory boreholes during drilling. One round of groundwater monitoring is due to be undertaken by TJC Environmental; however, at the time of reporting this had not yet been undertaken.
Hydrology	Ordnance Survey mapping Groundsure database (procured by TJC	The nearest identified surface watercourse is the Birmingham Canal, which bounds the site to the south. The EA classified this stretch of the Birmingham Canal as being of 'moderate' overall quality in 2019 under the Water Framework Directive classification scheme.
	Environmental in August 2022) Environmental	According to the Groundsure report procured by TJC Environmental, there are no active licensed surface water abstractions within a 1 km radius of the site.
	Agency Flood map for planning	According to the EA's fluvial and tidal flood map for planning, the majority of the site is located in Flood Zone 1 (low probability). This zone comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding (<0.1% in any year). A small portion of the north-eastern site corner (<5% of the total site area) is located in Flood Zone 2 (medium probability). This zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1% in any year) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5% in any year).
		According to the EA Flood Map for Surface Water which presents the theoretical potential for flooding from pluvial sources (i.e. flooding caused by rainwater exceeding capacity of drainage systems), the site is located in an area of Low flooding probability. This zone comprises land assessed as having between a 1 in 100 and 1 in 1000 annual probability of pluvial flooding (1% - 0.1% in any year).
		Surface water drainage networks are typically designed to accommodate only a 1 in 30 (3.3%) annual probability rainfall event. Older drainage networks may have a lower capacity, especially if they have not been maintained adequately. Although not true of every situation, surface water flooding is typically relatively shallow and would be expected to subside following the storm event assuming drainage assets are maintained in an appropriate condition.
Ecological Designated Sites	Groundsure database (procured by TJC Environmental in August 2022)	There are no statutory designated ecologically sensitive sites within a 2 km radius of the site.

Conditions	Source / Supporting Information	Description
	Environment Agency	

Table 2-2: Pollution History

Conditions	Source	Description
Pollution Incidents	Groundsure database (procured by TJC Environmental in August 2022)	 Recorded Pollution Incidents There are three recorded pollution incidents on site: 09/08/2001 - Pollution of asbestos materials, classified as a Category 3 (Minor Impact) to water and land. 04/10/2002 - Pollution of commercial waste, classified as a Category 3 (Minor Impact) to land. 19/12/2002 - Pollution of tyres, classified as a category 3 (Minor Impact) to land. These incidents are considered unlikely to have resulted in long-term impacts within the installation boundary. A further 20 pollution incidents were recorded within 250 m of the site, all of which were classified as minor or no impact.
Historical Land Uses	Historical ordnance survey mapping provided by Groundsure (procured by TJC Environmental in August 2022)	The map edition of 1887 shows that the site was developed with several buildings of the Anchor Iron Works. Bridge Street Wharf and a canal basin were located in the west of the site, and foundries, wharves and a rivet works were located to the south of the site. By 1938 the buildings in the western half of the site were no longer present, and the buildings in the east of the site had been replaced by a single large building labelled as a drop forging works. The canal basin previously noted in the west of the site was no longer depicted on mapping, suggesting it had possibly been infilled. Between 1938 and 1956 the drop forging works had been extended to the west, and new buildings had been developed in the north-west of the site. The mapping from 1974 to 1976 showed that the works on site had been extended further again to the west, reaching over halfway to the eastern end of the site. A travelling crane was shown in the east of the site by this time. By 1983, a central section of the works building had been demolished, and the western building was demolished between 2013 and 2016. The buildings in the north-east of the site were demolished in early 2022.
Waste Management Facilities	Groundsure Database (procured by TJC Environmental in August 2022)	Landfill Sites The Groundsure Datasheet does not record any historical or current landfill sites within a 1 km radius of the site. Licensed Waste Management Facilities There are four active and three historical licensed waste management facilities within a 1 km radius of the site. The nearest active facility is located approximately 60 m east of

Conditions	Source	Description
		the site operated by M K Auto Salvage for an annual tonnage of 2,500 (ref. EA/EPR/YP3492FG/A001).
Environmen-	Groundsure	Part A(1) Environmental Permits
tal Permits	database	There are three Part A(1) Environmental Permits within a 1km radius. The nearest is located approximately 220 m north of the site, registered to Birmingham Plating Company Limited for the surface treatment of metals and plastics.
		Part A(2) and B Environmental Permits
		There are no Part A(2) Environmental Permits within a 1km radius, and eight Part B Environmental Permits. The nearest is located approximately 160 m south-west of the site, registered to Trucube Limited for the use of bulk cement.
Current Site Activities	TJC Environmental, November 2022, Phase 1 and 2 Geo- Environmental Assessment	The TJC Environmental report included a site walkover inspection which was undertaken on 24 August 2022. The site was observed to be relatively flat, with natural ground levels at the site observed to vary between 143.5 m to 144.6 m above ordnance datum (AOD). The site was observed to be bounded by canals to the south and north-west. The central third of the site's north-western boundary was observed to be supported with a brick retaining wall, whilst the northern, eastern and south-western sections of the boundary were observed to steeply slope towards the canal. At the time of reporting, a single building was observed in the east of the site, comprising a main warehouse. A collection of extensions of the main building were observed in the south-eastern corner of the site, including further warehouse areas and disused offices. The offices were observed to have suffered some fire damage with the roof largely missing, and TJC considered that the fire damage had taken place in 2019. The external areas of the site were observed to be almost entirely covered with concrete slabs, and the north-west of the site was mostly covered with crushed brick. A small stockpile of approximately 300 m³ of crushed brick was also observed in this area. Several empty barrels and two intermediate bulk containers (IBCs) observed to be clean and empty.
Evidence of Historical Contaminat- ion	TJC Environmental, November 2022, Phase 1 and 2 Geo- Environmental Assessment	Potentially contaminative historical activities identified on site include an iron works, wharves, machinery manufacture and an infilled canal basin. Associated potential contaminants include asbestos, metals, polycyclic aromatic hydrocarbons (PAH) and total petroleum hydrocarbons (TPH), and there is a potential for the generation of ground gases from the presence of infilled materials associated with the former canal basin. Plausible theoretical pathways have been identified as direct contact with soils, ingestion of soil dust, vertical and lateral migration including leaching, and inhalation of dust and vapours; however it is noted that following development the site will largely be surfaced with hardstanding which may be expected to mitigate the risk from direct contact.

Conditions	Source	Description
		Plausible sensitive receptors have been identified as site workers / visitors, groundwater beneath the site and the canals adjacent to the south and north-west of the site.
		An intrusive investigation was undertaken by TJC Environmental in October 2022. The findings are summarised below.
Previous Reports	Report reproduced in Appendix 2	The 2022 TJC Environmental report was commissioned by Dunton Technologies to assess the potential risks from contaminated land and geotechnical constraints in the context of future use as a waste treatment hub for contaminated soils. The scope of the report included a site walkover inspection, review of site history and current land use, a review of the environmental setting, the development of an initial conceptual site model (CSM) and preliminary risk assessment (PRA).
		The historical mapping review identified former uses of the site to include an iron works, wharves, machinery manufacture and an infilled canal. The surrounding area was also identified to have a long industrial history, with several metal and glass works present over the years, two vehicle scrap yards close to the eastern and southern site boundaries and a vehicle garage located approximately 30 m to the south-east of the site.
		The PRA identified a low risk to site workers and visitors from asbestos, a low to moderate risk to site workers, visitors and groundwater from metals, PAHs and TPH from direct contact with soils, ingestion or inhalation of soil dust and leaching or migration of groundwater, and a low risk to canals. A low risk to site workers, visitors and property was identified from ground gases due to the time since infilling was undertaken (> 84 years) and the small size of the infilled area.
		TJC designed an intrusive investigation to obtain details of the near surface geology, obtain samples for laboratory analysis and undertake in-situ testing. The following scope was carried out:
		 Eight window sample boreholes drilled to between 0.8 m bgl and 5.45 m bgl.
		 Screening of all exploratory locations for unexploded ordnance (UXO) by a qualified engineer.
		Obtain samples for chemical laboratory analysis.
		Four rounds of ground gas monitoring.
		One round of groundwater monitoring. The strate encountered has been summarised by Pambell in
		The strata encountered has been summarised by Ramboll in the Geology section of this SCR.
		A slight to moderate hydrocarbon odour and black staining were noted in one location (WS108) in the central eastern part of the site from 1.3m to the base at 3.07 m bgl.
		A total of 14 soil samples were taken for analysis and were screened for the following determinands:
		Metals and metalloids
		Water soluble sulphate
		Total sulphate
		Water soluble boron

Conditions	Source	Description
		• PAH
		• TPH
		 Total organic carbon (TOC)
		• Asbestos
		Of the 14 samples screened for asbestos, three detected chrysotile fibres (<0.001% - 0.051%) in the central and north-eastern parts of the site.
		Analytical results were assessed by TJC against the Commercial/Industrial Suitable for Use Levels (S4ULs) (LQM/CIEH, 2015) Generic Assessment Criteria (GAC). No exceedances of any of the Commercial/Industrial S4UL GACs were identified. A further screen was undertaken against the Residential with Plant Uptake S4ULs and while a small number of minor exceedances were identified, the mean soil concentrations of the respective contaminants were all below the Residential with Plant Uptake GACs. TJC considered that this provided a good general indication that the levels of contamination identified at the site were low.
		Only two boreholes (WS102 and WS103) had sufficient water in them to be sampled. The sampling was undertaken on 27 October 2022. Groundwater samples were analysed and assessed against the Environmental Quality Standards (EQS) (Directive 2008/105/EC) for surface water. The results of the analysis were below the laboratory limits of detection for PAHs and TPH. Low concentrations of metals were detected and the EQS for cadmium, copper, nickel and zinc was slightly exceeded in WS102 (central western part of the site). A slight exceedance of the copper EQS was also identified in WS103 (western part of the site). TJC considered that, given the low to moderate sensitivity of the area in terms of controlled waters and the low levels of contaminants identified, the overall risk to controlled waters was considered to be low.
		Four rounds of ground gas monitoring were undertaken between 14 October 2022 and 03 November 2022. Methane was recorded at concentrations of between <0.1% v/v and 1.4% v/v, carbon dioxide was recorded at concentrations of between 1.2% v/v and 10.1% v/v and oxygen was recorded at concentrations of between 4.8% v/v and 19.2% v/v. No positive or negative flows were identified. The location with elevated methane was WS108, which was the only location in which visual/olfactory evidence of hydrocarbon contamination was identified. The elevated methane results in this location were considered by TJC to be as a result of the hydrocarbons. The elevated carbon dioxide was considered likely to be caused by breakdown of soil organic matter.
		The site was assessed as being Characteristic Situation 2, which requires basic gas protection measures in new buildings.
		In conclusion, TJC considered that the site poses a low risk to human health and controlled waters in the context of its proposed use.
Baseline Soil and	Previous reporting.	Baseline soil and groundwater reference data has been obtained from the previous intrusive site investigation.

Conditions	Source	Description
Groundwater Reference Data	Soil and chemical data summarised in Appendix 2.	For the purposes of this SCR, diesel is considered to be the primary 'relevant hazardous substance' which will be in use at the site. Hydrocarbons may also be imported to the site on contaminated soils being treated.
		Based on this, the SCR presents baseline reference data for contaminants which have the potential to be associated with the site's historical uses, and also with the current / future storage of diesel fuel; namely hydrocarbons:
		speciated total petroleum hydrocarbons (TPH-CWG) in the carbon range C5 to C44 (aliphatic and aromatic compounds); and
		• sixteen commonly occurring speciated polycyclic aromatic hydrocarbons (speciated PAHs).
		Groundwater Flow
		The 2022 ground investigation did not identify groundwater during the drilling of any of the eight boreholes. During subsequent monitoring rounds, groundwater levels were recorded between 1.73 m to 4.98 m bgl in four boreholes, whilst four of the boreholes remained dry. The monitoring results indicate that groundwater is perched within Made Ground and the upper glaciofluvial deposits, and do not represent a continuous groundwater body.
		Soil Baseline Reference Data
		Laboratory certificates are presented with the previous report in Appendix 2.
		In summary, across the site as a whole:
		Concentrations of TPH were predominantly below laboratory limits in all samples analysed with the exception of WS01, WS04, WS05 and WS08.
		BTEX were below laboratory reporting limits in all samples analysed.
		Total PAH (sum of sixteen) were recorded between the laboratory limit of detection and 77.5 mg/kg (west of the site).
		No significantly elevated concentrations above the GAC levels which would cause harm to human health were identified.
		Groundwater Baseline Reference Data
		Out of the two samples analysed:
		Total PAH was below laboratory reporting limits in both samples.
		TPH was below laboratory reporting limits in both samples.
Supporting information	See next column	Publicly available online geological mapping at www.bgs.ac.uk
and sources		Aquifer designations available at www.magic.gov.uk
		Site location plan and layout plan reproduced in Appendix 1, Figure 1 and 2 respectively
		Site drainage plan reproduced in Appendix 1
		TJC Environmental, Phase 1 and 2 Geo-Environmental Assessment, November 2022, ref. 10143.

3. PERMITTED ACTIVITIES

Table 3-1: Permitted Activities

Permitted Activities	The primary activities proposed to be undertaken at the site are associated with the operation and maintenance of a waste treatment facility. Site treatment is to be via physico-chemical treatment and bioremediation and the Operator proposes to treat a maximum of 215,000 tonnes of hazardous waste per year.		
	The principal treatment objective is to render the waste materials non-hazardous and appropriate for re-use at nearby restoration or environmental betterment schemes.		
	The facility will operate under provisions of Schedule 1, Section 5.3 A(1)(a)(i) Disposal of hazardous waste with a capacity exceeding 10 tonnes per day involving biological treatment, Section 5.3 A(1)(a)(vi) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment and Section 5.6 A(1)(a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes.		
Non-Permitted Activities Undertaken	The Installation boundary captures the directly associated activities across the facility.		
Document References For: • plan showing activity layout; and • environmental risk assessment.	 Appendix 1 - Site Location - 1620013520-001 Issue 1, Figure 1 Appendix 1 - Site Layout - Drawing ref. P2108-UMC-ZZ-00-DR-A-D0603 Appendix 1 - Overall Drainage Layout - P21028-FRH-EW-XX-DR-C-2000, Revision C02 		
	Appendix 3 – Environmental Risk Assessment		

4. CHANGES TO THE ACTIVITY

Table 4-1: Changes to the Activity

Have there been any changes to the activity boundary?	Not applicable at Permit Application. To be completed by the operator should changes to the permitted activity boundary change during the lifetime of the permit.
Have there been any changes to the permitted activities?	Not applicable at Permit Application. To be completed by the operator should changes to the permitted activities change during the lifetime of the permit.
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	Not applicable at Permit Application. To be completed by the operator should there be changes to the dangerous substances during the lifetime of the permit.
Checklist of supporting information	Not applicable at Permit Application. Supporting documentation to be provided by the operator should there be changes to any of the above during the lifetime of the permit.

5. MEASURES TAKEN TO PROTECT LAND

Table 5-1: Measures Taken to Protect Land

Operator to complete this se protection measures have be	ection during the lifetime of the Permit, to demonstrate that pollution een effective.
	tion, maintenance and monitoring are anticipated to be stipulated in the need to demonstrate compliance with the requirements in this section of
Checklist of Supporting Information	 Checklist of supporting information to include: Inspection records and summary of findings of inspections for all pollution prevention measures.
	Records of maintenance, repair and replacement of pollution prevention measures.

6. POLLUTION INCIDENTS THAT MAY HAVE HAD AN IMPACT ON LAND, AND THEIR REMEDIATION

Table 6-1: Pollution incidents that may have had an impact on land, and their remediation

Not required for Permit App	lication.
summarise any pollution inc one was investigated and re	ection during the lifetime of the Permit and at Permit Surender to cidents that may have damaged the land. Operator to describe how each emedied. If this is not possible can't, the operator will need to collect land need data to assess whether the land has deteriorated during the
Checklist of Supporting	Records of pollution incidents that may have impacted on land.
Information	Records of their investigation and remediation.

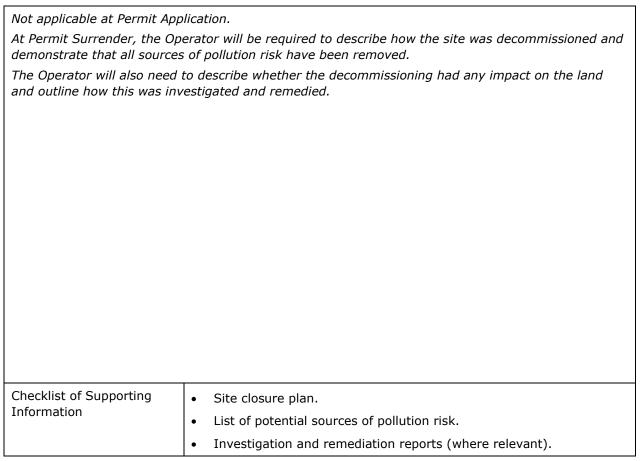
7. SOIL GAS AND WATER QUALITY MONITORING (WHERE UNDERTAKEN)

Table 7-1: Soil gas and water quality monitoring (where undertaken)

Not applicable at Permit App	lication.	
Given that there is no continuous groundwater body beneath the site, periodic groundwater monitoring is unlikely to be stipulated by the EA. The requirement for monitoring of any other environmental media will be stipulated in the Permit. If monitoring is required, the Operator will need to update this section of the SCR in due course.		
Checklist of Supporting Information	Description of soil gas and/or water monitoring undertaken.	
	Monitoring results (including graphs).	

8. DECOMMISSIONING AND REMOVAL OF POLLUTION RISK

Table 8-1: Decommissioning and removal of pollution risk



9. REFERENCE DATA AND REMEDIATION (WHERE RELEVANT)

Table 9-1: Reference data and remediation (where relevant)

Not required at Permit Applic	cation.
data was required. Or say th Condition Report. Overall, th	erator is required to say whether collection of land and/or groundwater hat it wasn't required from Sections 3, 4, 5 and 6 of the Surrender Site he objective of this section is to demonstrate that the land has not me of the Permit, i.e. as a result of the Operators activities, and the land is 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)

10. STATEMENT OF SITE CONDITION

Table 10-1: Statement of site condition

No	ot required at Permit Application.
То	be completed at Permit Surrender, using the information from Sections 3 to 7.
As	statement is required to confirm that:
•	the permitted activities have stopped;
•	decommissioning is complete, and the pollution risk has been removed; and
•	the land is in a satisfactory condition.

APPENDIX 1 FIGURES

APPENDIX 2 2022 SITE INVESTIGATION REPORT

APPENDIX 3 ENVIRONMENTAL RISK ASSESSMENT