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SITE CONDITION REPORT

Environmental and sustainability solutions provided to S NORTON & CO LTD

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2.0	Second Issue	12/09/2025

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1.0 INTRODUCTION

Name of the applicant	S. Norton & Co Limited
Activity address	Land at Cornwall Road Smethwick West Midlands B66 2JR
National grid reference	British National Grid Reference: SP03168899
Document reference and dates for Site Condition Report at permit application and surrender	Date at application: EPR-A03 Site Condition Report – 18/03/2025
Document references for site plans (including location and boundaries)	The following figures and drawings are included in the accompanying documents: • EPR_001 Site Location Plan v1 • EPR_002 Site Layout Plan v1

2.0 CONDITION OF LAND AT PERMIT ISSUE

Environmental setting	S. Norton & Co Ltd (Hereon 'SN&Co') are developing the Site into a metals recycling and authorised treatment facility recovering waste, including end-of-life vehicles and waste electrical and electronic equipment. A Bespoke Installation Environmental Permit issued by the Environment Agency (EA) and held by SN&Co is required to operate the Site as a waste treatment installation. The Site comprises a parcel of land located approximately 1.00km northeast of the Smethwick Town Centre and is accessed off Cornwall Road at the north-western corner of the Site. The surrounding area is generally comprised of various industrial and commercial developments and properties, including warehouse units and external yard areas. The Site is bound to the north by Cornwall Road, to the east by a road (B4136), to the south by the Birmingham Canal and to the west by further industrial development. WRM attended Site on the 22nd of April 2024 to undertake a Site reconnaissance visit. A summary of key relevant information and features observed on-Site is presented below. At the time of this report and Site attendance by WRM the Site is vacant and demolition operations are ongoing to remove the structures and buildings of the former Darcast Crankshanks Facility. The northern portion of the Site is predominantly comprised of soft landscaping, however, WRM was informed by the Site representative that buried structures and obstructions are present in this portion of the Site associated with the historical industrial use of the Site. The Site entrance and associated ancillary structures including a security building, weighbridge and an area of hardstanding for parking are present in the north-western portion of the Site. The western portion of the Site generally comprises areas of macadam and concrete hardstanding that previously provided access, parking, and an external yard area. Limited areas of soft landscaping are also present in addition to several associated ancillary structures of corrugated metal sheeting comprising external shelters. WRM was informed by the Site representative that a tank was previously present in this portion of the Site.

The central, southern, and eastern portions of the Site are predominantly comprised of open space following the demolition of the former Darcast Crankshanks Facility. Several stockpiles of demolition material are present across these portions of the Site and a small portion of the former facility remains pending further demolition operations. WRM was informed by the Site representative that this portion of the former facility housed an electrical substation.

Several ancillary structures are present on the eastern boundary of the Site, including a small brick-built structure housing the gas mains connection, and a metal frame structure housing the water mains connection. The southeastern corner of the Site is occupied by a small area of concrete hardstanding with a few concrete walls remaining. WRM was informed by the Site representative that a second electrical substation was previously present on the eastern boundary of the Site in the vicinity of the old gas main connection.

Geology

The Site is indicated by the British Geological Survey (BGS) online viewer (GeoIndex) and sheet mapping (Sheet No. 168 Birmingham 1:50,000) to be underlain by the following sequence:

- Superficial deposits of Glaciofluvial Deposits across the majority of the Site comprising sand and gravel with lenses of silt, clay and organic material; considered likely to be underlain by
- Superficial deposits of Glacial Till comprising Diamiction that are indicated to outcrop at the surface in the western portion of the Site; underlain by
- Solid geology of the Wildmoor Sandstone Member of the Wilmslow Sandstone Formation across the majority of the Site comprising sandstone with subordinate siltstone and mudstone; and
- Solid geology of the Chester Formation in the northernwestern corner of the Site comprising sandstone.

There is one publicly available BGS recorded borehole (SP08NW9) located on-Site. The intrusive location relates to an abstraction well that encountered unspecified ‘Drift’ geology, considered likely to comprise superficial deposits, to a depth of approximately 16.2 m below ground level (bgl), underlain by sandstone.

Hydrology

The closest surface water feature to the Site is the Birmingham Canal, located to the immediate south of the Site.

In addition, the following data is presented within the Envirocheck Report:

- There are thirty-four discharge consents to surface water within 500m of the Site. The closest listing relates to the release of Surface Water to a canal located approximately 20m to the south. The status of this listing is recorded as Revoked. The remaining listings are located in excess of 75m from the Site and relate to various discharges, including Storm Sewage Overflow, Site Drainage, Surface Water and Sewage – Final Effluent.

Hydrogeology

The superficial deposits of Glaciofluvial Deposits are classified by the EA as Secondary A Aquifer, and the superficial deposits of Glacial Till are classified by the EA as Secondary Undifferentiated Aquifer. The solid geology of the Wildmoor Sandstone Member and the Chester Formation are both classified by the EA as Principal Aquifer

In addition, the EA provides the following classification and data:

- The Site within a surface water Nitrate Vulnerable Zone; and
- The Site is within a Zone III (Total Catchment) Source Protection Zone.

Flooding

The Site is indicated by the Environment Agency to be:

- At very low risk of flooding from rivers and the sea, defined as a less than 0.1% chance of flooding each year.
- The Site is generally at a very low risk of surface water flooding defined as a less than 0.1% chance of flooding each year. However localised portions in the north, west and south of the Site are at a low risk of flooding, defined as between 0.1% and 1% chance each year, with a localised portion in the west of the Site indicated to be between a medium risk (1% to 3.3% chance) and high risk (greater than 3.3% chance) of flooding.
- The Site is in an area where flooding from groundwater and reservoirs is unlikely.

Pollution history including: pollution incidents that may have affected land historical land-uses and associated contaminants any visual or olfactory evidence of existing contamination evidence of damage to pollution prevention measures	**<u>Historical Land Use</u>** **1887 – 1890** • The Site occupies the majority of the wider Cornwall Engineering Works which extends further off-Site to the west and comprises four main structures. • In addition, several ancillary structures are labelled within the works on-Site including two travelling cranes, a swing bridge and a basin between the structures in the central portion of the Site. • Predominantly occupied by industrial development including Smethwick Gas Works to the east, Woodford Iron Works to the west and Pheonix Bolt and Nut Works to the north. • The Birmingham Canal is present to the immediate south, and railway lines are present 80m and 250m to the south. • Three gas holders are present between 30m and 150m to the east. **1904 – 1905** • A structure has been developed in the central portion of the Site that connects the northern and southern structures of the wider Cornwall Engineering Works. • Kingston Metal Works is now present to the south-west of the Site, with an additional railway line present 80m to the south. • The Woodford Iron Works to the west is now the Smethwick Works (Steel Tube) and there has been industrial development to the north and south-east of the Site. **1917 – 1921** • The structure in the south-eastern portion of the Site has been expanded and there has been limited further development in the north-western corner of the Site. • Kingston Metal Works has expanded to the south of the Site. Several tanks are present up to 100m north of the Site and up to 30m to the east. • The gas works is no longer labelled as such, however, the associated structures within remain present. **1937 – 1938** • There has been minor development in the south-western portion of the Site, and the layout of the structures in this portion of the Site have changed. • Kingston Metal Works has expanded to the south. A Gas Holder is present approximately 80m to the north-east, and several additional tanks are present between 50m and 120m to the east.

	• There has been further industrial development to the north of the Site with these structures now labelled as Cycle Works, PowerHouse, Foundry, Engineering Works, and Boulton Mills (Tube). **1955 – 1958** • Tanks are present in the centre of the Site between the two main structures. • Four small unlabelled and unspecified structures are present in the south-western corner of the Site. • The additional gas holder to the east of the Site is no longer present, and only two remain. • The majority of tanks in the vicinity of the Site a no longer labelled. **1966 – 1967** • The entire Site is labelled as an unspecified 'Works'. • There has been limited continued industrial development of the area surrounding the Site. **1972 – 1978** • The individual structures within the Site are now labelled, with the south-eastern structure indicated to comprise a foundry, the western structure that extends into the northern portion indicated to comprise a Steel Stockyard, and a Warehouse present in the north-eastern corner of the Site. • The four unspecified structures, the basin and the tanks in the centre of the Site are no longer present, and additional tanks are indicated to be present in the southern portion of the Site. • The majority of structures to the east within the former gas works are no longer present with only two gas holders remaining labelled as Gasholder Stations. • The surrounding area is now occupied by various industrial businesses including but not limited to an Engineering Works, Pressing & Welding Works, Plating Works, Tube Manipulating Works, Cycle Works and a Scrapyard with associated ancillary infrastructure such as tanks. • Electrical substations are present approximately 30m to the west and 10m to the north. **1979 – 1985** • The have been minor changes to the structures of the industrial development in the surrounding area. **1989 – 1993** • The Gas Station and gas holder to the east of the Site is no longer present, with only the gas holder to the north-east remaining.

- The area to the east of the Site is now vacant.
- The industrial development in the area surrounding the Site is indicated to be occupied by various unspecified businesses, comprising Works, Warehouse, Depot, and Factory.

1999

- The Site generally represents the layout of the former Darcast Crankshanks Facility prior to demolitions operations.
- There has been continued minor industrial development of the surrounding area.

2006

- The gas holder to the northeast of the Site is no longer present.

2024

- The land to the west of the Site has been redeveloped and is now comprises several industrial and commercial businesses.

On-Site Summary

From at least 1887 until approximately 1958 the Site is indicated to have been occupied by the Cornwall Engineering Works, and associated ancillary infrastructure including basins, travelling cranes and a swing bridge. Since at least 1958 the Site has been occupied by a steel stockyard and foundry with tanks present in the central portion of the Site between 1955 and 1972, and in the southern portion since at least 1972, however detailed imagery indicating the presence or absence of these tanks in the southern portion is not available beyond 1992. Since at least 1999 the Site layout has generally represented the present-day layout of the former Darcast Crankshanks Facility prior to demolition operations.

Surrounding Area Summary

Since at least 1887 until the present day the surrounding area has generally comprised industrial and commercial developments, including various manufacturing and engineering works. The Birmingham Canal present to the immediate south of the Site since at least 1887, and Smethwick Gas Works has been present to the east of the Site since at least 1887, with the majority of structures within the gas works indicated to no longer be present by 1972. The final gas holder was present until approximately 2006, however it is anticipated that it may not have been operational until this date.

Pollution Incidents

- There are eleven Pollution Incidents to Controlled Waters listings located within 500 m of the Site. The closest two listings are located between 10m and 20m southeast of the Site and relate to the release of Inert Suspended Solids in 1997 and Foam in 1998. Both these listings are recorded as category 3 – minor incident. The remaining listings are located in excess of 200m from the Site and relate to the release of various pollutants, including Foam, Acid, Diesel, Crude Sewage, Inert Suspended Solids and Colour.
- There are five Substantiated Pollution Incident Register listings located within 500m of the Site. All five listings are located in excess of 250m from the Site and relate to the release of various pollutants, including Smoke, Other Organic Chemical or Product, Dust and Other Inert. There is one listing recorded as category one – major impact to land, located approximately 330m north-east of the Site dated 2001.

Waste Register

- There is one Licences Waste Management Facilities (Locations) record on-Site for a WEEE treatment facility at N S A House, Cornwell Road (Licence No. 100546). This listing is recorded as being issued in 2008 and subsequently revoked in 2015. Further from Site there are nineteen listings within 500m. These listings relate to various activities, including Metal Recycling Sites, Transfer Stations, Vehicle Depollution Facilities and Inert and Excavation Waste Treatment in excess of 60m from the Site.
- There are three Registered Waste Transfer Sites listings located within 500 m of the Site. The closest listing relates to a Site that accepted various wastes and the licence status is recorded as lapsed/cancelled/surrendered. The remaining two listings are located in excess of 350m from the Site and relate to skip hire businesses that can accept various non-hazardous wastes.
- There are eleven Registered Waste treatment or Disposal Sites listings within 500m of the Site. The closest listing is located approximately 10m to the east and relates to an operational scrapyard that accepts scrap metal and scrap vehicles. The remaining listings are located in excess of 150m from the Site nine of which relate to scrapyards and one relates to a treatment Site.

	Industrial Activity • There is one Contemporary Trade Directory Entries record on-Site that relates to Engine Component Manufacturers of Darcast Crankshanks Limited. The status of this record is listed as active, however is it understood that this facility is no longer operational, and the associated structures of this facility are either undergoing or have been demolished. Further from Site there are one hundred and seven listings within 250m of the Site that relate to various active and inactive commercial and industrial activities, including but not limited to Engineers, Manufacturers, Haulage Services, Recycling Services and Cleaning Services. • There is one Manufacturing and Production (Points of Interest) record on-Site relating to Tanks (Generic). It is understood that these tanks are no longer present on-Site following demolition operations, however their location was confirmed by the Site representative during Site attendance by WRM and their locations are indicated on the OS Mapping within Figure 2, Site Location Plan. Further from Site there are eighty five listings within 250m of the Site, that relate to various industrial features, including Unspecified Works or Factories, Business Parks and Industrial Estates and Tanks (Generic). • There are three Planning Hazardous Substance Consents listings located within 500m of the Site. The closest listing relates to Smethwick Gasholder located approximately 105m east of the Site for liquefied extremely flammable gas and natural gas and is dated 1992. It is considered that this listing relates to the historical gas holder station to the east of the Site identified on the historical mapping that is no longer present. The remaining listings are located in excess of 200m from the Site. • There is one Notification of Installations Handling Hazardous Substances listing located within 500m of the Site. The listing relates to the Smethwick Holder Station located approximately 105m to the east and is recorded as being not active.

Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	There are no previous third-party Site investigation, Assessment, Remediation or Verification reports for the Site relevant to historical contamination.
Baseline Soil and Groundwater Reference Data	Walker Resource Management Ltd (WRM) have undertaken a Baseline Preliminary Risk Assessment of the Site to develop a Conceptual Site Model of the underlying soil and groundwater conditions. This report has been undertaken to support an intrusive ground investigation which was carried out between 21st – 23rd October 2024 to establish the baseline conditions. The report for this investigation accompanies this report. Although detectable concentrations of metals, PAHs, TPH and other compounds have been identified within shallow Made Ground at the site, the majority of determinands in the soil samples were below their respective commercial GAC. A single elevated concentration of total TPH was identified in CP102 in the southern central area of the site. Localised marginally elevated concentrations of metals including cadmium, copper, mercury, nickel and zinc were identified within the groundwater beneath the site.
Supporting Information	• EPR-A06_App_C_Site_History • EPR-A06_App_D_Envirocheck • EPR_A06 Baseline PRA v1 • EPR_A07 Baseline Environmental Assessment v3

3.0 PERMITTED ACTIVITIES

Permitted Activities	SN&Co are developing the Site into a metals recycling and authorised treatment facility. A Bespoke Installation Environmental Permit issued by the EA and held by SN&Co is required to operate the Site as a waste treatment installation. Site operations and activities will be undertaken in accordance with the listed permitted activities within the environmental permit issued.
Non-Permitted Activities Undertaken	There will be no non-permitted activities undertaken on-Site
Document References for: • **Plan showing activity layout** • **Historical land use maps** • **Site sensitivity maps**	The following figures and drawings are included in the accompanying documents: • EPR_001 Site Location Plan v1 • EPR_002 Site Layout Plan v1 • EPR-A06_App_C_Site_History • EPR-A06_App_D_Envirocheck

4.0 STAGE 1-3 ASSESSMENT OF HAZARDOUS SUBSTANCES

4.1 Hazardous Substance Identification & Associated Relevant Hazardous Substances – Stage 1 & 2

The waste streams accepted by SN&Co as stated in EPR-OP02 Waste Acceptance Procedure include:

- Mixed scrap metals (ferrous and non-ferrous metals).
- Lead acid batteries.
- Hazardous and non-hazardous cables.
- Large domestic appliances (LDAs).
- End of life vehicles (ELVs).

The waste streams accepted onto site and associated waste codes deemed as hazardous as per the *Environment Agency Guidance on the Classification and Assessment of Waste* and; whether or not these waste streams are deemed as 'Relevant Hazardous Substances' as per the Stage 2 Assessment outlined in the *European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions* and *Article 3 of Regulation (EC) No 1272/2008 on the classification, labelling and pack aging of substances and mixtures (CLP Regulation)* are outlined in the table below.

The relevant hazardous substances found within these waste streams include heavy metals such as cadmium, lead, nickel and mercury, PCBs, PAHs, TPHs and asbestos. These substances have been sampled and accounted for within the Baseline Environmental Assessment for the site (see EPR_A07_Baseline_Environmental_Assessment_v3).

EWC Code	Description	Contain Relevant Hazardous Substance (Yes / No)
10 09 05	Casting cores and moulds which have not undergone pouring containing hazardous substances	Yes
10 09 07	Casting cores and moulds which have undergone pouring containing hazardous substances	Yes
10 10 05	Casting cores and moulds which have not undergone pouring containing hazardous substances	Yes
10 10 07	Casting cores and moulds which have undergone pouring containing hazardous substances	Yes
16 01 04	End-of-life vehicles	Yes
16 01 07	Oil filters	Yes
16 01 21	Hazardous cables from ELVs	Yes
16 06 01	Lead batteries	Yes
16 06 02	Ni-Cd batteries	Yes
16 06 03	Mercury-containing batteries	Yes
17 04 10	Hazardous cables from construction and demolition sources	Yes
19 10 03	Fluff-light fraction and dust containing hazardous substances	Yes
19 10 05	Other fractions containing hazardous substances	Yes

20 01 33	Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries	Yes
20 01 35	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components	Yes

4.2 Assessment of Site-Specific Pollution Possibility – Stage 3

For each relevant hazardous substance brought forward from Stage 2, SN&Co have identified the actual possibility for soil or groundwater contamination at the site of the installation, including the probability of releases and their consequences and denoted it in the table below, taking particular account of:

- The quantities of each hazardous substance or groups of similar hazardous substances concerned;
- How and where hazardous substances are stored, used and to be transported around the installation;
- Where they pose a risk to be released, and;
- The measures that have been adopted to ensure that it is impossible in practice that contamination of soil or groundwater takes place.

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
10 09 05 - Casting cores and moulds which have not undergone pouring containing hazardous substances	Direct run-off, flood waters, permeate / flow through soil, across ground surface, via surface water drains, ditches etc.	Soil, Groundwater	Low	High	Med	Accepted waste could be contaminated with compounds such as phenols and heavy metal compounds. Acceptance and Treatment Procedures in place on site. Treatment takes place on an impermeable surface. Most treatment activities take place within a building.	• Some material will be processed inside a building. • Daily site inspections. • Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type, source, handling requirements, presence of hazards within the materials and European Waste Catalogue (EWC) code adherence checks) will be received. • On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure. • The site shall store waste in designated storage bays. • The majority of waste processing occurs in a building.	Low

Pollutant Model			Judgement				Action	
Source	Pathway	Receptor	P	C	M	Justification of Magnitude	Risk Management	Residual Risk
							• Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points. • All surface water generated on site will pass through a silt trap and oil interceptor prior to discharge into combined sewer. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages.	

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
10 09 07 - Casting cores and moulds which have undergone pouring containing hazardous substances	Direct run-off, flood waters, permeate / flow through soil, across ground surface, via surface water drains, ditches etc.	Soil, Groundwater	Low	High	Med	Accepted waste could be contaminated with compounds such as phenols and heavy metal compounds. Acceptance and Treatment Procedures in place on site. Treatment takes place on an impermeable surface. Most treatment activities take place within a building.	• Some material will be processed inside a building. • Daily site inspections. • Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type, source, handling requirements, presence of hazards within the materials and European Waste Catalogue (EWC) code adherence checks) will be received. • On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure. • The site shall store waste in designated storage bays. • The majority of waste processing occurs in a building.	Low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
							• Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points. • All surface water generated on site will pass through a silt trap and oil interceptor prior to discharge into combined sewer. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages.	
10 10 05 - Casting cores and moulds which have	Direct run-off, flood waters, permeate /	Soil, Groundwater	Low	High	Med	Accepted waste could be contaminated with compounds such as	• Some material will be processed inside a building. • Daily site inspections.	Low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
not undergone pouring containing hazardous substances	flow through soil, across ground surface, via surface water drains, ditches etc.					phenols and heavy metal compounds. Acceptance and Treatment Procedures in place on site. Treatment takes place on an impermeable surface. Most treatment activities take place within a building.	• Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type, source, handling requirements, presence of hazards within the materials and European Waste Catalogue (EWC) code adherence checks) will be received. • On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure. • The site shall store waste in designated storage bays. • The majority of waste processing occurs in a building.	

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
							• Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points. • All surface water generated on site will pass through a silt trap and oil interceptor prior to discharge into combined sewer. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages.	
10 10 07 - Casting cores and moulds which have	Direct run-off, flood waters, permeate /	Soil, Groundwater	Low	High	Med	Accepted waste could be contaminated with compounds such as	• Some material will be processed inside a building. • Daily site inspections.	Low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
undergone pouring containing hazardous substances	flow through soil, across ground surface, via surface water drains, ditches etc.					phenols and heavy metal compounds. Acceptance and Treatment Procedures in place on site. Treatment takes place on an impermeable surface. Most treatment activities take place within a building.	• Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type, source, handling requirements, presence of hazards within the materials and European Waste Catalogue (EWC) code adherence checks) will be received. • On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure. • The site shall store waste in designated storage bays. • The majority of waste processing occurs in a building.	

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
							• Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points. • All surface water generated on site will pass through a silt trap and oil interceptor prior to discharge into combined sewer. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages.	
16 01 04 - End-of-life vehicles	Direct run-off, flood waters, permeate /	Soil, Groundwater	Low	High	Med	Vehicle fluids such as fuels and oils, batteries and paints / coatings	• Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type,	Low

Pollutant Model			Judgement				Action	
Source	Pathway	Receptor	P	C	M	Justification of Magnitude	Risk Management	Residual Risk
	flow through soil, across ground surface, via surface water drains, ditches etc.					contain compounds such as heavy metals. There are two depollution rigs on site, each with a capacity of 3 cars (3 tonnes) per hour. Acceptance and Treatment Procedures in place on site. Treatment takes place on an impermeable surface. Most treatment activities take place within a building.	source, handling requirements, presence of hazards within the materials and European Waste Catalogue (EWC) code adherence checks) will be received. • On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure. • The site shall store waste in designated storage bays. • The accepted ELVs will be stored externally adjacent to ELV depollution building. • Once manoeuvred into the building the ELVs are placed on depollution rigs for initial inspection from a senior operator to ensure the ELVs conform with the site's waste processing requirement.	

Pollutant Model			Judgement				Action	
Source	Pathway	Receptor	P	C	M	Justification of Magnitude	Risk Management	Residual Risk
							• Batteries removed within a building and stored in a designated battery bin. • All fluid filler caps in engine bay (engine oil, engine coolant, brake & clutch fluid, windscreen washer fluid and power steering fluid) removed within a building. • LPG tank removal (if necessary) undertake within a building and stored in an orphaned gas cylinder cage. • Depollution of the ELV undertaken within a building. • Air Conditioning suctioned out and injected into a recovery cylinder within a separate area within the depollution building. The cylinder is stored within the designated cylinder storage area when full. • Proceeding depollution, depolluted ELVs are manoeuvred to the metal shearing area of the site for further treatment.	

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
							• Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points. • All surface water generated on site will pass through a silt trap and oil interceptor prior to discharge into combined sewer. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages.	
16 01 07 – Oil filters	Direct run-off, flood waters, permeate /	Soil, Groundwater	Low	High	Med	Residual oil can contain hazardous substances such as heavy metals and PAHs.	• Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type,	Low

Pollutant Model			Judgement				Action	
Source	Pathway	Receptor	P	C	M	Justification of Magnitude	Risk Management	Residual Risk
	flow through soil, across ground surface, via surface water drains, ditches etc.					Potential leakage of oil. Acceptance and Treatment Procedures in place on site. Treatment takes place on an impermeable surface. Most treatment activities take place within a building.	source, handling requirements, presence of hazards within the materials and European Waste Catalogue (EWC) code adherence checks) will be received. • On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure. • The site shall store waste in designated storage bays. • The majority of waste processing occurs in a building. • Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points.	

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
							• All surface water generated on site will pass through a silt trap and oil interceptor prior to discharge into combined sewer. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages.	
16 01 21 - Hazardous cables from ELVs	Direct run-off, flood waters, permeate / flow through soil, across ground surface, via surface water drains, ditches etc.	Soil, Groundwater	Low	High	Med	Older vehicle cables may contain PCBs. POPs may be present in sheathing. Cables may be contaminated with vehicle fluids. Acceptance and Treatment Procedures in place on site. Treatment takes place	• Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type, source, handling requirements, presence of hazards within the materials and European Waste Catalogue (EWC) code adherence checks) will be received.	Low

Pollutant Model			Judgement				Action	
Source	Pathway	Receptor	P	C	M	Justification of Magnitude	Risk Management	Residual Risk
						on an impermeable surface. Most treatment activities take place within a building.	• On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure. • The site shall store waste in designated storage bays. • The majority of waste processing occurs in a building. • Hazardous cables are received on site via public and merchant loads. • Cables are sorted by hand and are either stripped manually or manually fed into a mechanical stripper as required prior to storage in covered skips ahead of export from the site. • Impermeable concrete surface with falls towards drains prevents run-off from flowing off site.	

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
							• All surface waters generated on site are captured via surface drains points. • All surface water generated on site will pass through a silt trap and oil interceptor prior to discharge into combined sewer. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages.	
16 06 01 - Lead batteries	Direct run-off, flood waters, permeate / flow through soil, across ground surface, via	Soil, Groundwater	Low	High	Med	Lead is a toxic heavy metal which can pollute soil and groundwater. Acceptance and Treatment Procedures in place on site. Treatment takes place	• Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type, source, handling requirements, presence of hazards within the materials and European Waste	Low

Pollutant Model			Judgement				Action	
Source	Pathway	Receptor	P	C	M	Justification of Magnitude	Risk Management	Residual Risk
	surface water drains, ditches etc.					on an impermeable surface. Most treatment activities take place within a building.	Catalogue (EWC) code adherence checks) will be received. • On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure. • The site shall store waste in designated storage bays. • The majority of waste processing occurs in a building. • Lead acid batteries are received on site either via public and merchant loads or as part of the ELVs. • The batteries are sorted by hand and stored in one of three dolavs for the following battery types: portable lead acid batteries, industrial lead acid batteries or automotive lead acid batteries.	

Pollutant Model			Judgement				Action	
Source	Pathway	Receptor	P	C	M	Justification of Magnitude	Risk Management	Residual Risk
							• The dolavs are stored within the battery storage area of the non-ferrous building ahead of export from the site. • Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points. • All surface water generated on site will pass through a silt trap and oil interceptor prior to discharge into combined sewer. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • Emergency procedures are outlined in the Accident Management Plan.	

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
							• Staff training on spillages.	
16 06 02 - Ni-Cd batteries	Direct run-off, flood waters, permeate / flow through soil, across ground surface, via surface water drains, ditches etc.	Soil, Groundwater	Low	High	Med	Cadmium (Cd) is a toxic heavy metal which can pollute soil and groundwater. Certain Nickel compounds are classified as carcinogenic. Acceptance and Treatment Procedures in place on site. Treatment takes place on an impermeable surface. Most treatment activities take place within a building.	• Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type, source, handling requirements, presence of hazards within the materials and European Waste Catalogue (EWC) code adherence checks) will be received. • On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure.	Low

Pollutant Model			Judgement				Action	
Source	Pathway	Receptor	P	C	M	Justification of Magnitude	Risk Management	Residual Risk
							• The site shall store waste in designated storage bays. • The majority of waste processing occurs in a building. • Batteries will be removed within the depollution building and stored in a designated battery bin. • Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points. • All surface water generated on site will pass through a silt trap and oil interceptor prior to discharge into combined sewer. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface.	

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
							• Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages.	
16 06 03 - Mercury-containing batteries	Direct run-off, flood waters, permeate / flow through soil, across ground surface, via surface water drains, ditches etc.	Soil, Groundwater	Low	High	Med	Mercury is a toxic heavy metal which can pollute soil and groundwater. It is on the EU list of priority hazardous substances. Acceptance and Treatment Procedures in place on site. Treatment takes place on an impermeable surface. Most treatment activities take place within a building.	• Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type, source, handling requirements, presence of hazards within the materials and European Waste Catalogue (EWC) code adherence checks) will be received. • On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure. • The site shall store waste in designated storage bays.	Low

Pollutant Model			Judgement				Action	
Source	Pathway	Receptor	P	C	M	Justification of Magnitude	Risk Management	Residual Risk
							• The majority of waste processing occurs in a building. • Batteries will be removed within the depollution building and stored in a designated battery bin. • Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages.	

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
17 04 10 - Hazardous cables from construction and demolition sources	Direct run-off, flood waters, permeate / flow through soil, across ground surface, via surface water drains, ditches etc.	Soil, Groundwater	Low	High	Med	Cables, especially older cables may contain POPs within the sheathing as well as tar and / or bitumen which contains PAHs. Acceptance and Treatment Procedures in place on site. Treatment takes place on an impermeable surface. Most treatment activities take place within a building.	• Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type, source, handling requirements, presence of hazards within the materials and European Waste Catalogue (EWC) code adherence checks) will be received. • On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure. • The site shall store waste in designated storage bays. • The majority of waste processing occurs in a building. • Hazardous cables are received on site via public and merchant loads.	Low

Pollutant Model			Judgement				Action	
Source	Pathway	Receptor	P	C	M	Justification of Magnitude	Risk Management	Residual Risk
							• Cables are sorted by hand and are either stripped manually or manually fed into a mechanical stripper as required prior to storage in covered skips ahead of export from the site. • Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points. • All surface water generated on site will pass through a silt trap and oil interceptor prior to discharge into combined sewer. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • Emergency procedures are outlined in the Accident Management Plan.	

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
							• Staff training on spillages.	
19 10 03 - Fluff-light fraction and dust containing hazardous substances	Direct run-off, flood waters, permeate / flow through soil, across ground surface, via surface water drains, ditches etc.	Soil, Groundwater	Low	High	Med	Fluff-light fraction and dust containing hazardous substances could be contaminated with heavy metals, PCBs from oils, PAHs from bitumen etc. Acceptance and Treatment Procedures in place on site. Treatment takes place on an impermeable surface. Most treatment activities take place within a building.	• Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type, source, handling requirements, presence of hazards within the materials and European Waste Catalogue (EWC) code adherence checks) will be received. • On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure. • The site shall store waste in designated storage bays.	Low

Pollutant Model			Judgement				Action	
Source	Pathway	Receptor	P	C	M	Justification of Magnitude	Risk Management	Residual Risk
							• The majority of waste processing occurs in a building. • Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points. • All surface water generated on site will pass through a silt trap and oil interceptor prior to discharge into combined sewer. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages.	

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
19 10 05 - Other fractions containing hazardous substances	Direct run-off, flood waters, permeate / flow through soil, across ground surface, via surface water drains, ditches etc.	Soil, Groundwater	Low	High	Med	Other fractions containing hazardous substances could be contaminated with heavy metals, PCBs from oils, PAHs from bitumen etc. Acceptance and Treatment Procedures in place on site. Treatment takes place on an impermeable surface. Most treatment activities take place within a building.	• Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type, source, handling requirements, presence of hazards within the materials and European Waste Catalogue (EWC) code adherence checks) will be received. • On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure. • The site shall store waste in designated storage bays. • The majority of waste processing occurs in a building.	Low

Pollutant Model			Judgement				Action	
Source	Pathway	Receptor	P	C	M	Justification of Magnitude	Risk Management	Residual Risk
							• Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points. • All surface water generated on site will pass through a silt trap and oil interceptor prior to discharge into combined sewer. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages.	
20 01 33 - Batteries and accumulators included in 16	Direct run-off, flood waters, permeate /	Soil, Groundwater	Low	High	Med	Lead, Cadmium and Mercury are toxic heavy metals which can	• Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type,	Low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries	flow through soil, across ground surface, via surface water drains, ditches etc.					pollute soil and groundwater. Acceptance and Treatment Procedures in place on site. Treatment takes place on an impermeable surface. Most treatment activities take place within a building.	source, handling requirements, presence of hazards within the materials and European Waste Catalogue (EWC) code adherence checks) will be received. • On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure. • The site shall store waste in designated storage bays. • The majority of waste processing occurs in a building. • Batteries will be removed within the depollution building and stored in a designated battery bin. • Impermeable concrete surface with falls towards drains prevents run-off from flowing off site.	

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
							• All surface waters generated on site are captured via surface drains points. • Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages.	
20 01 35 - Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23	Direct run-off, flood waters, permeate / flow through soil, across ground surface, via surface	Soil, Groundwater	Low	High	Med	Heavy metals contained in circuit boards, switches, batteries etc. Batteries embedded in WEEE may contain hazardous substances such as heavy metals and lead-acid.	• Prior to acceptance, a statement from the supplier outlining their Duty of Care and commitment to quality control (consistency of material type, source, handling requirements, presence of hazards within the materials and European Waste Catalogue (EWC) code adherence checks) will be received.	Low

Pollutant Model			Judgement				Action	
Source	**Pathway**	**Receptor**	**P**	**C**	**M**	**Justification of Magnitude**	**Risk Management**	**Residual Risk**
containing hazardous components	water drains, ditches etc.					Acceptance and Treatment Procedures in place on site. Treatment takes place on an impermeable surface. Most treatment activities take place within a building.	• On arrival all wastes will be deposited in the waste reception area. • Wastes are inspected on arrival and are rejected if the EWC code does not meet the allowable inputs as detailed in the Waste Acceptance Procedure. • The site shall store waste in designated storage bays. • The majority of waste processing occurs in a building. • Batteries will be removed within the depollution building and stored in a designated battery bin. • Impermeable concrete surface with falls towards drains prevents run-off from flowing off site. • All surface waters generated on site are captured via surface drains points.	

Pollutant Model			Judgement				Action	
Source	Pathway	Receptor	P	C	M	Justification of Magnitude	Risk Management	Residual Risk
							• Spill kits and drain cover mats present on site for use if a spill is detected. • Routine inspection and maintenance of fuel tank and site surface. • Emergency procedures are outlined in the Accident Management Plan. • Staff training on spillages.	

P = Possibility C = Consequence M = Magnitude

4.3 Baseline Report

A baseline soil and groundwater report (reference see EPR_A07_Baseline_Environmental_Assessment_v3) has been produced and accompanies this document which covers the following substances which feature in the relevant hazardous substances described above:

- Asbestos
- Heavy metals, Total Petroleum Hydrocarbons, Criteria Working Group Method (TPHCWG), Benzene, Toluene, Ethylbenzene and Xylene (BTEX)
- Speciated Polycyclic Aromatic Hydrocarbons (PAH)
- Volatile and Semi-Volatile Organic Compounds (VOC and SVOC)

- Polychlorinated Biphenyls (PCBs)
- Phenols
- Fluoride
- Phosphate

5.0 CHANGES TO THE ACTIVITY

Have there been any changes to the activity boundary?	If yes, provide a plan showing the changes to the activity boundary
Have there been any changes to the permitted activities?	If yes, provide a description of the changes to the permitted activities
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	If yes, list of them
Checklist of supporting information	• Plan showing any changes to the boundary (where relevant) • Description of the changes to the permitted activities (where relevant) • List of 'dangerous substances' used/produced by the permitted activities that were not identified in the Application Site Condition Report (where relevant)

6.0 MEASURES TAKEN TO PROTECT LAND

Use records that you collected during the life of the permit to summarise whether pollution prevention measures worked. If you can't, you need to collect land and/or groundwater data to assess whether the land has deteriorated.	
Checklist of supporting information	• Inspection records and summary of findings of inspections for all pollution prevention measures • Records of maintenance, repair and replacement of pollution prevention measures

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

Summarise any pollution incidents that may have damaged the land. Describe how you investigated and remedied each one. If you can't, you need to collect land and /or groundwater reference data to assess whether the land has deteriorated while you've been there.	
Checklist of supporting information	• Records of pollution incidents that may have impacted on land • Records of their investigation and remediation

8.0 SOIL GAS AND WATER QUALITY MONITORING (WHERE UNDERTAKEN)

Provide details of any soil gas and/or water monitoring you did. Include a summary of the findings. Say whether it shows that the land deteriorated as a result of the permitted activities. If it did, outline how you investigated and remedied this.	
Checklist of supporting information	• Description of soil gas and/or water monitoring undertaken • Monitoring results (including graphs)

9.0 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	• Site closure plan • List of potential sources of pollution risk • Investigation and remediation reports (where relevant)

10.0 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 section 4 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)

11.0 STATEMENT OF SITE CONDITION

Using the information from sections 4 and 5, 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.