Environmental Permit Application – Supporting Documentation Appendix B - Site Condition Report Addendum

Ellesmere Port Active Chemicals

Innospec Limited

Oil Sites Road, Ellesmere Port, Cheshire, CH65 4EY

Prepared by:

SLR Consulting Limited

5th Floor, 35 Dale Street, Manchester, M1 2HF

SLR Project No.: 410.067515.00001

29 January 2026

Revision: 01

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
01	29 January 2026	RH	JR	MW
	Click to enter a date.			
	Click to enter a date.			
	Click to enter a date.			

Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Innospec Limited (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.

Table of Contents

Tables in Text

Appendices

1.0 Introduction

This Site Condition Report (SCR) update has been prepared in support of an application for substantial variation of Environmental Permit (EP) number EPR/BU4112IK for the Ellesmere Port Active Chemicals Installation.

The Operator is Innospec Limited, and the site is located on Oil Sites Road, Ellesmere Port, Cheshire, CH65 4EY (the 'Site').

The variation is required due to the installation of new production process and associated equipment in, and adjacent to the PC3 building. The new plant will be operated as a multipurpose plant under a multiproduct protocol.

The variation is to add a Listed Activity Section 4.1 under Schedule 1, Part A1 of the Environmental Permitting (England and Wales) Regulations (EPR) 2016 (as amended) for the manufacture of organic chemicals (Section 4.1 A(1)(a)(iv) – producing organic compounds containing nitrogen).

Full details of the proposed new production plant and its operation are provided in the main technical supporting document for this application.

The content of this update to the SCR is focussed solely on the changes being made at the site in relation to the operation of the new production plant. No review of other site operations has been undertaken.

1.1.1 Site Details

Table 1: Site Details

Aspect	Details
Applicant	Innospec limited
Address	Oil Sites Road, Ellesmere Port, Cheshire, CH65 4EY
National Grid Reference	SJ 41857 76614
Site Area	Approximately 0.80 hectares
Document Ref for Site Condition Report	410.067515.00001 – Innospec Ltd – SCR Addendum dated November 2025.
Figure References – See Appendix A of the main technical supporting document	• Figure 1 - Site Location and Boundary. • Figure 2 – Site Layout with Permit Boundary and Emission Points. • Figure 3 – New Plant Area and Internal Layout. • Figure 4 – Process Flow Diagram. • Figure 5 – Reactor PID. • Figure 6 – Vacuum set, Chiller & Scrubber PID. • Figure 7 – Proposed Consolidated EP Installation Boundary and Emission Points.

1.1.2 Site Location and Layout

The site is located on Oil Sites Road, which provides access to the site. Surrounding land use is predominantly industrial properties and woodland surrounding the site. There are some open land and woodland areas surrounding the site, as well as the Manchester Ship Canal and River Mersey to the north. The M53 is also located to the west of the site.

The site is centred on grid reference SJ 41857 76614.

A site location map is presented in Appendix A – Figure 1.

1.1.3 Consolidation of Environmental Permits

The new process plant will be located within, or adjacent to, the existing PC3 building which is within the extant Installation boundary. However, the new process plant also includes a containment / dump tank, and loading facilities to load the product into isotainers, and their associated pipework, containment systems and ancillary systems. These items of plant are all proposed to be located on land that is currently within the Installation boundary for the other site Environmental Permit (EPR/BM0508IG) also held by Innospec.

To facilitate this variation, as the two permits are operated as an integrated installation by the same operator as it is proposed that EPR/BU4112IK and EPR/BM0508IG be consolidated into a single Environmental Permit.

We note that:

- Both Environmental Permits are operated by the same legal entity (Innospec Limited), so there would be no change in the 'operator' or the management systems and controls;
- The combination of the two permits into one means that there would be no break in the regulation of the land under EPR, or change in the soil or groundwater pollution liabilities to Innospec;
- The site condition reports and baseline condition records currently in place for each of the EP's would continue to apply.
- The site operational activities will continue to be split into Active Chemicals and Octane Additives (Lead Alkyls) production, with dedicated areas of the site for each and dedicated associated emission points as currently defined in each EP.
- There are no changes proposed as part of this variation application that relate to the Octane Additives (Lead Alkyls) activities currently undertaken under EPR/BM0508IG.

A revised overall Installation boundary plan for the consolidated permits is presented in Appendix A - Figure 7.

It is anticipated that as part of the consolidation of the EP's the EA may require some update of existing documentation to reflect the combined single permit e.g. preparation of a consolidated Site Condition Report etc. and Innospec proposes that such requirements be addressed as Improvement Conditions to the consolidated permit in order to ensure that there are no unnecessary delays to the grant of permit for the proposed new activities requested under this Variation application.

1.1.4 Current Surrounding Land Use

A summary of the current land use surrounding the site is provided in Table 2 below.

Table 2: Surrounding Land Uses

Boundary	Description
North	Industrial and commercial premises within the Indigo Business Park. Manchester Ship Canal and the River Mersey.
West	Industrial premises within the Indigo Business Park.

Boundary	Description
South	Oil Sites Road, industrial premises and a railway line.
East	Indigo Road, industrial premises within the Indigo Business Park, woodland and open land at Stanlow Point.

1.1.5 Environmental Site Setting

Table 3 provides an overview of the current environmental site setting, the details of the site setting are presented in Section 3 of the Qualitative Risk Assessment presented in Appendix E of the Technical Documentation supplied for this variation application.

Further information can also be found in Appendix B2 of this report – Site Condition Report (2021).

Table 3: Environmental Setting

Description	
Topography and gradient	Site elevation is approximately 10mAOD and is relatively flat with no clear slope.
Surface water features	A search of the Multi-Agency Geographical Information for the Countryside (MAGIC)[1] map revealed that the closest surface water feature is the Manchester Ship Canal approximately 340m north and the River Mersey approximately 370m north of the site.
Flood Risk	The Flood Map for Planning identifies the site as lying within a Flood Zone 3. Land assessed as having a 1 in 100 or greater annual probability of river flooding.[2] The Long-Term Flood Risk assessment identifies the Site as being 'very low risk' from flooding from rivers and surface water.[3]
Geology	Geology British Geological Survey (BGS)[4] data indicates that the site is underlain by a bedrock of Wilmslow Sandstone Formation – Sandstone. Sedimentary bedrock formed between 252.2 and 247.1 million years ago during the Triassic period. There are also superficial deposits overlying the bedrock. This is in the form of Tidal Flat deposits – clay, silt and sand. Hydrology

[1] Magic Map Application

[2] https://flood-map-for-planning.service.gov.uk/

[3] Check the long term flood risk for an area in England - GOV.UK (www.gov.uk)

[4] GeoIndex (onshore) - British Geological Survey

Description	
	According to MAGIC, the groundwater vulnerability at the site is classified as Medium risk. This means that there is a medium risk of a pollutant reaching the groundwater below the site. Hydrogeology The bedrock geology is classified as a Principal Aquifer. The superficial geology beneath the site is classified by the EA as Secondary (undifferentiated). A on the Multi-Agency Information for the Countryside (MAGIC) website. MAGIC has confirmed that there are no Source Protection Zone's within 2000m of the site.
RAMSAR, SSSI, SPA, Local Wildlife Sites, Woodland Priority Habitat.	The Mersey Estuary is designated as a RAMSAR site, SSSI and a Special Protection Area, which is approximately 370m north of the site. Local Wildlife Sites include, Stanlow Point, River Gowy, Shellway Road Pond South, Shropshire Union Canal Tow Path, Little Stanley to Waverton.

1.2 Identification of Relevant Hazardous Substances (RHS)

Table 4 presents a list of all the raw materials and products proposed to be handled by the new production plant.

A review of the material categories listed in Table 4 has been undertaken to assess whether the materials are hazardous, and whether they can be considered to be a Relevant Hazardous Substance in relation to having the potential to lead to pollution of soil or groundwater.

These have been grouped by raw materials and products with a precautionary approach being applied to the initial assessment i.e. if any of the materials within each category are considered to be RHS, or where insufficient data was available on the materials listed (e.g. on the ECHA website), it has been assumed for the purposes of the initial pollution risk assessment that the materials within each category have the potential to be RHS. The findings of this review are summarised in Table 5.

This initial review has not taken into account the physical form of the materials being used at the site or layers of protection present at the site which could potentially prevent or contain losses, which are considered in Section 4.3. However, the maximum credible loss due to failure of a single primary containment package / container has been noted to provide an indication of the likely scale of loss under a simple loss of containment incident.

Table 4: Raw Materials, Products, Wastes and other Materials Associated with the Operation of the New Process Plant

Raw Material	Storage Type and Capacity of Largest Unit	Maximum Inventory	Storage Location
Raw materials to produce Arquad Nitrite and P13PA			
Adogen 462-75% Contains Quaternary ammonium compounds, dicocoalkyldimethyl, Chlorides and Propan-2-ol	Typically in liquid form stored in 1m^3 IBCs or 220 litre drums.	20Te Within existing site IBC /drum storage areas. Moved to production area (PC3) as required for use	Raw material storage area with impermeable concrete surfacing – fully bunded. PC3 building has concrete hardstanding and is bunded
Isopropyl alcohol Contains 2-Propanol	Typically in liquid form stored in 1m^3 IBCs or 220 litre drums.	15Te Within existing site IBC /drum storage areas. Moved to production area (PC3) as required for use	Raw material storage area with impermeable concrete surfacing – fully bunded. PC3 building has concrete hardstanding and is bunded

Raw Material	Storage Type and Capacity of Largest Unit	Maximum Inventory	Storage Location
Sodium nitrite	Typically in solid form (granular solid) stored in 1m^3 FIBCs.	5Te Within existing site IBC /drum storage areas. Moved to production area (PC3) as required for use	Raw material storage area with impermeable concrete surfacing – fully bunded. PC3 building has concrete hardstanding and is bunded
Aromatic 150 Fluid Contains Solvent naphtha (petroleum), Heavy aromatic. naphthalene. Pseudocumene (1,2,4-trimethylbenzene).	Typically in liquid form stored in 1m^3 IBCs or 220 litre drums.	40Te Within existing site IBC /drum storage areas. Moved to production area (PC3) as required for use	Raw material storage area with impermeable concrete surfacing – fully bunded. PC3 building has concrete hardstanding and is bunded
DUOMEEN T Contains N-Tallow -1,3-diaminopropane	Typically in liquid form stored in 1m^3 IBCs or 220 litre drums.	35Te Within existing site IBC /drum storage areas. Moved to production area (PC3) as required for use	Raw material storage area with impermeable concrete surfacing – fully bunded. PC3 building has concrete hardstanding and is bunded
Epichlorhydrin	Typically in liquid form stored in 220 litre drums.	12Te Within existing EP2 Chemical store. Moved to production area (PC3) as required for use	EP2 Chemical store with impermeable concrete surface – fully bunded. Located remote from production areas. PC3 building has concrete hardstanding and is bunded
Materials / Products Produced by the New Plant Note that the material produced by the new process plant will be used as raw materials in the existing Stadis manufacturing processes on site. These 'raw materials' produced on site will be available as an alternate supply route to ensure security of supply following production and supply issues with the current suppliers. Once these 'raw material' products have been loaded into the isotainers, they will be transferred to the existing site infrastructure where they will be unloaded and the materials handled in the same way as would occur if the materials had been brought on to site in a road tanker. The isotainer offloading and subsequent bulk storage or repacking activities already form part of the existing site operations.			

Raw Material	Storage Type and Capacity of Largest Unit	Maximum Inventory	Storage Location
P13PA Contains Solvent naptha (petroleum), heavy arom. Naphthalene. 1,2,4-Trimethylbenzene	Typically in liquid form loaded into Isotainer. Then transferred to existing site tanker offloading facilities for transfer into the existing P13PA bulk storage tank on MPFA for the Stadis production processes (Storage tank T8429). The use of the bulk tank for this purpose is already consented under the environmental permit.	Isotainer 26m³ Bulk Tank T8429 100 m³	Isotainer loading area located over bunded loading area with impermeable concrete surfacing and blind containment sump. Constructed in line with CIRIA C736 requirements. Storage tank located in existing bunded tank farm (existing).
Arquad 2c-nitrite LA Contains Quaternary ammonium compounds, dicoco alkyldimethyl,nitrites. 2-Propanol. Methanol. Dicocodimethylammonium chloride.	Typically in liquid form loaded into Isotainer Isotainer will be transferred to existing site tanker offloading facilities and fed into existing site systems to repack this material into IBC's or drums for use on the plant. Drums and IBC's will be stored within the existing site IBC /drum storage areas as would currently be the case for deliveries of this material from offsite.	Isotainer 26m³	Isotainer loading area located over bunded loading area with impermeable concrete surfacing and blind containment sump. Isotainer emptying and material repacking will be undertaken in existing site facilities. Such activities are undertaken over impermeable surfacing with appropriate containment. Raw material storage area with impermeable concrete surfacing – fully bunded.

Raw Material	Storage Type and Capacity of Largest Unit	Maximum Inventory	Storage Location
Arquad 2C-75 Contains Dicocodimethylammonium chloride, 2-Propanol.	Typically in liquid form loaded into Isotainer Isotainer will be transferred to existing site tanker offloading facilities and fed into existing site systems to repack this material into IBC's or drums for use on the plant. Drums and IBC's will be stored within the existing site IBC /drum storage areas as would currently be the case for deliveries of this material from offsite.	Isotainer 26m³	Isotainer loading area located over bunded loading area with impermeable concrete surfacing and blind containment sump. Isotainer emptying and material repacking will be undertaken in existing site facilities. Such activities are undertaken over impermeable surfacing with appropriate containment. Raw material storage area with impermeable concrete surfacing – fully bunded.

Table 5: Identification of Relevant Hazardous Substances

Raw Material Type	Hazardous Substance	Relevant Hazardous Substance	Justification	Maximum Potential Loss from a Single Container
Raw Materials				
Adogen 462-75% Contains Quaternary ammonium compounds, dicocoalkyldimethyl, Chlorides and Propan-2-ol	Yes	Yes	It is classified as H400 (Very toxic to aquatic life) and H410 (Very toxic to aquatic life with long lasting effects). It will be stored in liquid form, and due to its classification as H400 and H410, it has been considered a Relevant Hazardous Substance (RHS) for this assessment.	1m³ IBC
Isopropyl alcohol Contains 2-Propanol	Yes	No	Isopropyl alcohol is a volatile organic compound that is readily biodegradable and does not bioaccumulate. It	1m³ IBC

Raw Material Type	Hazardous Substance	Relevant Hazardous Substance	Justification	Maximum Potential Loss from a Single Container
			does also not have any hazardous environmental risk phrases. It poses minimal risk to soil or groundwater and is therefore not considered an RHS for this assessment.	

Raw Material Type	Hazardous Substance	Relevant Hazardous Substance	Justification	Maximum Potential Loss from a Single Container
Sodium nitrite	Yes	Yes	It is classified as H400 (Very toxic to aquatic life). Although sodium nitrite is not likely to bioaccumulate and is unlikely to cause long-term impacts on groundwater, it can significantly alter pH if released, affecting the mobility of other substances. For this reason and the hazardous H400 classification, it is considered a Relevant Hazardous Substance (RHS) in this assessment.	$1m^3$ FIBCs. Note this is in solid granular form.
Aromatic 150 Fluid Contains Solvent naphtha (petroleum), Heavy aromatic. naphthalene. Pseudocumene (1,2,4-trimethylbenzene).	Yes	Yes	It is classified as H351 (Suspected of causing cancer). H411, H401 Aromatic 150 Fluid contains persistent and toxic aromatic hydrocarbons that are soluble in water and pose a significant risk to groundwater and soil. Due to its hazardous classifications (H351, H411, H401), it is considered a Relevant Hazardous Substance (RHS) for this assessment.	$1m^3$ IBC
DUOMEEN T Contains N-Tallow -1,3-diaminopropane	Yes	Yes	It is classified as H410 (Very toxic to aquatic life with long lasting effects). Although DUOMEEN T is biodegradable and not bioaccumulative, it is very toxic to aquatic life (H410). At high concentrations, toxicity risk exists, so it is considered a Relevant Hazardous Substance (RHS) for this assessment.	$1m^3$ IBC or more likely 220 litre drum

Raw Material Type	Hazardous Substance	Relevant Hazardous Substance	Justification	Maximum Potential Loss from a Single Container
Epichlorhydrin	Yes	Yes	It is classified as H350 (May cause cancer). Epichlorohydrin is soluble and mobile in groundwater and classified as H350 (may cause cancer). Although it is biodegradable and not bioaccumulative, its toxicity and mobility mean it is considered a Relevant Hazardous Substance (RHS) for this assessment.	220 litre drum
Products				

Raw Material Type	Hazardous Substance	Relevant Hazardous Substance	Justification	Maximum Potential Loss from a Single Container
P13PA Contains Solvent naptha (petroleum), heavy arom. Naphthalene. 1,2,4-Trimethylbenzene	Yes	Yes	It is classified as H351 (Suspected of causing cancer). P13PA contains aromatic hydrocarbons and some non-biodegradable components. Due to its hazardous classifications (H351), it is considered a Relevant Hazardous Substance (RHS), although the Isotainer storage will significantly limit pollution risk.	26m³ Isotainer
Arquad 2c-nitrite LA Contains Quaternary ammonium compounds, dicoco alkyldimethyl,nitrites. 2-Propanol. Methanol. Dicocodimethylammonium chloride.	Yes	Yes	It is classified as H400 (Very toxic to aquatic life) and H412 (Harmful to aquatic life with long lasting effects). Arquad 2c-nitrite LA contains quaternary ammonium compounds and nitrites, classified as H400 and H412. These substances are toxic to aquatic life and persistent, so they are considered Relevant Hazardous Substances (RHS) for this assessment, although the Isotainer storage will significantly limit pollution risk.	26m³ Isotainer Or 1m³ IBC once in storage areas
Arquad 2C-75 Contains Dicocodimethylammonium chloride, 2-Propanol.	Yes	Yes	It is classified as H410 (Very toxic to aquatic life with long lasting effects). Arquad 2C-75 contains quaternary ammonium compounds and 2-Propanol, classified as H410. These substances are very toxic to aquatic life and persistent, so they are considered Relevant Hazardous Substances (RHS) for this assessment, although the Isotainer storage will significantly limit pollution risk.	26m³ Isotainer Or 1m³ IBC once in storage areas

1.3 Pollution Risk Assessment

1.3.1 Pollution Sources

The pollution sources are those Relevant Hazardous Substances identified in Section 1.2.

To simplify the risk assessment these have been grouped according to their physical state and storage location as follows:

- Solid materials stored within dedicated warehouse storage areas which have impermeable concrete flooring;
- Bulk liquids / products are stored within existing site tank farms, or in Isotainers, within dedicated impermeable bunded areas;
- Other liquid materials (in IBC's/drums etc) are stored over appropriately bunded areas either in the form of concrete bunded areas, portable bunds, dedicated bunded storage cabinets or similar;
- Losses from the production processes on site will be contained within a dedicated impermeable reactor bund.

Bulk storage in Isotainers has been included in the assessment due to potential pollution risk in the event of catastrophic failure.

1.3.2 Pathways

The only pathway for any of the materials stored and used at site to impact on potential soil, groundwater and surface water would be the direct loss of materials to unsurfaced ground or permeable site surfacing.

1.3.3 Receptors

The defined receptors for this assessment will be the soil and surface water, and some groundwater. Table 6 presents the details of the groundwater underlying the site.

Table 6: Groundwater Receptors

Aspect	Designation	Associated With	Description
Aquifer Designation – Superficial Deposit	Unproductive Strata	Tidal Flat deposits – clay, silt and sand	These deposits are not water-bearing and do not contain underground layers of water-bearing permeable rock or drift deposits from which groundwater can be extracted.
Aquifer Designation – Bedrock Deposit	Principal Aquifer	Secondary (Undifferentiated)	Principal sandstone aquifer up to 600 m thick and yielding up to 125 L/s. Quality good but hard and becomes saline beneath confining Mercia Mudstone
Groundwater Source Protection Zone	-	-	There are no groundwater source protection zones within 2000m of the site

1.3.4 Loss Prevention and Spill Control Measures

1.3.4.1 Storage

All raw materials, products, and wastes are stored within dedicated storage areas with appropriate containment measures.

- Liquids are stored in IBCs and drums within the designated chemical / flammable materials storage areas on impermeable surfacing with bunding.
- Epichlorhydrin is stored in 220 litre drums in the EP2 chemical store, which is bunded and has an impermeable floor.
- Bulk liquid products (P13PA, Arquad 2c-nitrite LA, Arquad 2C-75) are filled into Isotainers located on bunded areas over impermeable concrete.
- All storage areas are designed to prevent uncontrolled releases, with no direct drainage to the environment.

Dry and solid materials will be delivered to site by road and will be contained within bags, sacks or other suitable smaller containers. All dry and powdered materials will be stored within dedicated warehouse storage areas which have impermeable concrete flooring.

Liquids or solutions will also be delivered to site via road vehicle and will be offloaded into the bunded storage areas. The maximum capacity of any single container supplied to site will be 1m³.

All drums, IBC's and FIBC's will be manufactured to appropriate ISO design standards or equivalent.

The Isotainers will also be manufactured to the appropriate ISO design standards.

All deliveries to site will be inspected on receipt to identify potential leakage or damage to the primary container.

1.3.4.2 Secondary Containment

As outlined in section 1.3.4.1, all chemicals storage on site will be within dedicated secondary containment systems e.g. impermeable appropriately sized bunds.

Bulk liquids will be stored within existing site tank farms with dedicated impermeable bunds.

Other liquid materials (in IBC's / drums etc.) will be stored over appropriately bunded areas in the form of impermeable concrete bunded areas.

All dry and powdered materials will be stored within dedicated warehouse storage areas which have impermeable concrete flooring.

The main process activities will all be undertaken within building PC3, and the reactor is located above an impermeable concrete bund. The flooring in building PC3 is impermeable concrete and there are raised doorway accesses and a central gulley / sump to allow the building floor to act as additional containment for small losses. The largest single container within the PC3 building will be a 1m³ IBC, and the bunding is sized to contain more than 1 IBC of material. The reactor is within its own dedicated bund.

Isotainer loading will be undertaken within a fully bunded loading area which has a containment capacity of 36m³.

The new Isotainer loading area containment bund has been designed in accordance with the requirements of CIRIA C736.

All site bunded areas that will be used in relation to the new production process have been appropriately sized to contain potential losses.

The secondary containment provisions are all subject to periodic inspection and maintenance to ensure that they remain in good functional order.

1.3.4.3 Management Controls

The site managed by technically competent personnel in accordance with site procedures and the Environmental Management System (EMS). This ensures good practice and minimises environmental risk. The site has certification to ISO14001.

The site management systems include procedures covering receipt of deliveries, moving and handling materials around site, management of storage areas, spill response, incident response, and logging and follow up of incidents etc.

The site management systems also set out the requirements for inspection and maintenance of site systems and infrastructure to ensure that they remain in good working order and fit for purpose.

These management controls are subject to periodic audit and update.

All relevant site staff receive appropriate training on the application of the procedural controls, and in particular the appropriate actions to take with regard to identifying and dealing with spillages or leaks should they occur.

All storage areas will be subject to scheduled visual housekeeping checks and inspections to ensure that there are no leaks or losses into secondary containment systems and that the containment infrastructure remains in good condition.

Any spillages of dry or powdered materials will be cleaned up at point of spillage using dry techniques e.g. brush and dustpan.

Any spillages of liquids or solutions will be cleaned up at point of spillage using adsorbents, spill kits and other suitable clean up measures.

1.3.5 Findings of the Soil and Groundwater Pollution Risk Assessment

The findings of the soil and groundwater pollution risk assessment are presented in the spreadsheet in Appendix B1.

The assessment has concluded that whilst the site will store and use relevant hazardous substances, they will primarily be present within good quality primary containment and stored within appropriately bunded areas. All storage activities will be controlled under the site management system procedural controls and subject to periodic visual checks, scheduled inspection and maintenance. The movement of material around the site will be undertaken by trained site staff subject to site procedural controls, and containers being moved around site roadways will be checked for leakage before, during and after movement, with time on site roadways being minimised.

When taking into account the layers of protection that will be in place on site, the potential for pollution of the underlying soil and groundwater is considered to be extremely low and therefore not a credible potential source of pollution.

2.0 Conclusion

Environmental sensitivity at the site is considered to be low to moderate, and not significant, as discussed in Appendix B2.

The RHS assessment has concluded that in relation to the activities to be undertaken at the new process plant, there is no credible risk of pollution as the existing site infrastructure and management controls are considered suitable and sufficient to effectively manage the pollution risk.

2.1.1.1 Baseline Soil and Groundwater Reference Data

Whilst the RHS assessment has identified that there is not considered to be a credible risk of pollution associated with the new process activities, Innospec already has site condition data that is relevant to the location of the new process activities.

Appendix B2 presents a Site Condition Report Addendum as submitted with Variation V008 of the Environmental Permit in 2021. This document includes data relevant to the location of the PC3 plant and the Isotainer loading area with boreholes BH9 and BH10 being located adjacent to the PC3 building.

Appendix B2 also provides details of monitoring undertaken in September 2015, October 2010, July 2008 and September/October 2004. The overall baseline data for this site was collected through intrusive investigations in 2004, as defined under the Site Protection and Monitoring Programme (SPMP).

It is proposed that this data be used to define the site condition baseline in relation to the new process.

Appendix B1 Soil and Groundwater Pollution Risk Assessment

Environmental Permit Application – Supporting Documentation Appendix B - Site Condition Report Addendum

Ellesmere Port Active Chemicals

Innospec Limited

SLR Project No.: 410.067515.00001

29 January 2026

Appendix B2 Site Condition Report 2021

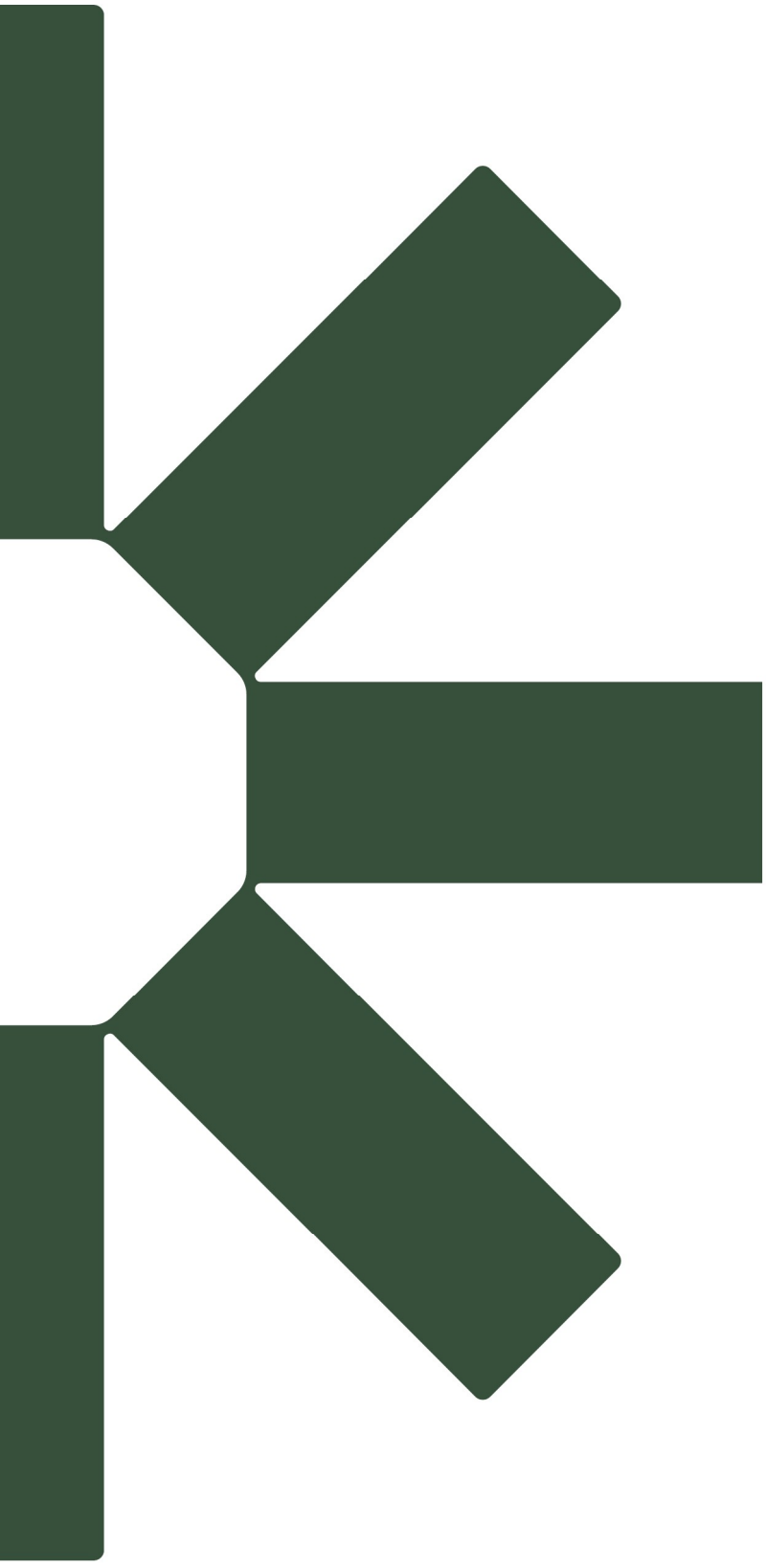
Environmental Permit Application – Supporting Documentation Appendix B - Site Condition Report Addendum

Ellesmere Port Active Chemicals

Innospec Limited

SLR Project No.: 410.067515.00001

29 January 2026



Making Sustainability Happen