



Foyle - Gloucester

Environmental Permit Application

EPR Ref: UP3700PX/A001

Baseline Report

Document Ref: Attachment B.2.3.C

BASELINE REPORT - SCR

FOYLE LTD, CINDERFORD, GLOUCESTER, UK

INTRODUCTION

This report has been prepared on behalf of the Foyle – Gloucester meat processing facility at Forest Vale Industrial Estate, Forest Vale Rd, Cinderford in support of an application for a Bespoke Environmental Permit under the Environmental Permitting Regulations (2016) for England and Wales, which has been made to the Environment Agency.

The purpose of this report is to meet the requirements of Article 22(2) of the Industrial Emissions Directive (2010/75/EU) and to determine whether or not a baseline report is required for the facility. This report has been prepared in line with the “*European Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on Industrial Emissions*” (2014/C 136/03) and forms part of the environmental permit application.

REQUIREMENT FOR BASELINE REPORT

European Legislation

The Industrial Emissions Directive (2010/75/EU) or ‘IED’ entered into force within the European Union on the 6th of January 2011. The IED is a recast of 7 pieces of legislation including the Integrated Pollution Prevention and Control Directive (2008/1/EC), the Waste Incineration Directive (2000/76/EC) and five other directives. The IE Directive had to be transposed into national legislation by Member States by 7 January 2013.

For industrial activities regulated by the IED, Article 22(2) of Chapter II of the IED states that:

“Where the activity involves the use, production or release of relevant hazardous substances and having regard to the possibility of soil and groundwater contamination at the site of the installation, the operator shall prepare and submit to the competent authority a baseline report before starting operation of an installation or before a permit for an installation is updated for the first time after 7 January 2013”.

“The baseline report shall contain the information necessary to determine the state of soil and groundwater contamination so as to make a quantified comparison with the state upon definitive cessation of activities provided for under paragraph 3”.

“The baseline report shall contain at least the following information:

- (a) Information on the present use and, where available on past uses of the site;*
- (b) Where available, existing information on soil and groundwater measurements that reflect the state at the time the report is drawn up or, alternatively, new soil and groundwater measurements having regard to the possibility of soil and groundwater contamination by those hazardous substances to be used, produced or released by the installation concerned.*

Where information produced pursuant to other national or Union law fulfils the requirements of this paragraph that information may be included in, or attached to, the submitted baseline report.

BASELINE REPORT - SCR

FOYLE LTD, CINDERFORD, GLOUCESTER, UK

The Commission shall establish guidance on the content of the baseline report.”

The Commission has established guidance on the content of the baseline report in the form of “*European Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on Industrial Emissions*” which has been followed in the production of this report.

SCOPE OF THE REPORT

This report follows the stages set out in the *European Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on Industrial Emissions*” (2014/C 136/03).

The substances currently used at the facility are listed in stage 1, with those which are hazardous, identified in stage 2. The possibility of soil and groundwater contamination by these hazardous substances is addressed in Stage 3 in the assessment of the site-specific pollution possibility.

BASELINE REPORT - SCR

FOYLE LTD, CINDERFORD, GLOUCESTER, UK

1.0 STAGE 1 – SITE ACTIVITIES AND IDENTIFICATION OF HAZARDOUS SUBSTANCES

1.1 Current Use

Foyle Food Group operates a slaughtering facility on a 13,000 M² site located at Forest Vale Road, Forest Vale Industrial Estate, Cinderford, Gloucester, GL14 2PH, United Kingdom. Activities at the site include the slaughter of cattle and the dressing, chilling and quartering of beef carcasses, the cutting of beef and the harvesting of offal, cod fat and bones, the packing of beef, beef offal, cod fat and bones into vacuum pouches and lined cardboard boxes.

The east of the site is bounded by the B4227 main road. The south of the site is bounded by a car breakers yard, while the north is bounded by an industrial facility. The west boundary of the site is made up of a mixture of trees, hedgerows and beyond which is the Severn Trent municipal plant.

The Cinderford Brook watercourse also runs adjacent to the western boundary of the site. Regionally, the site is positioned in an industrial estate on the outskirts of the town of Cinderford which itself is located on the eastern fringe of the Forest of Dean in Gloucestershire. The Forest of Dean is characterised by more than 110 km² of mixed woodland.

The actual tonnage of finished product produced in 2018 was 20,712 tonnes..

The site employs 230 staff and is approximately 13,000 M² in size, with a weekly slaughter in excess of 1500 cattle from which carcass beef is processed.

The site has both ISO14001:2015 and BRC accreditation. The site has a Severn Trent Water Discharge Licence to discharge treated process effluent and foul water.

Foyle has caused no significant pollution since operations began at the site. See Attachment B.2.3.B – Site Condition Report.

1.2 Past Use

Prior to being acquired by the Foyle Food Group in 2013, the site was used for the slaughter and processing of pigs by Ensor's Ltd.

1.3 Pollution Incidents

On Thursday 17th January 2019, the site was informed by the Environment Agency of a potential surface water contamination issue at Cinderford Brook, in the vicinity of the sites surface water discharge point.

After an investigation it was determined that a number of drains within the rear yard area, which were thought to be part of process drainage network were actually being directed to the surface water drainage network.

See attachment B.3.3, section 6.0 for further detail.

BASELINE REPORT - SCR
FOYLE LTD, CINDERFORD, GLOUCESTER, UK

1.4 Identification of Substances Used, Produced or Stored at the Gloucester Facility

It is necessary to determine whether or not hazardous substances are used, produced or released in view of deciding on the need to prepare and submit a baseline report. The following substances have been identified as used in the day to day operations of the activity and are all included in the site *Control of Substances Hazardous to Health - Master Register*:

Table 1.1: Inventory of Material's/Substances within the Gloucester facility

MATERIAL/ SUBSTANCE	CAS NUMBER	R-PHASE	S-PHASE	HAZARD STATEMENT	VOLUME STORED	NATURE OF USE	STORAGE LOCATION
Cleaning/Hygiene							
NOPAC	-	R34	S24/25, S26, S36/37/39, S45, S60	-	75 kg	Detergent	Chemical Store
<i>Methanesulphonic Acid</i>	<i>75-75-2</i>	<i>R34</i>	-	<i>H314</i>			
TWS	-	R35	S24/25, S26, S36/37/39, S45, S60	-	180 kg	Detergent	Chemical Store
<i>Sodium Hydroxide</i>	<i>1310-73-2</i>	<i>R35</i>	-	<i>H314</i>			
RAPIER	-	-	-	H290, H314, H318, H400, H412	600 kg	Detergent	Chemical Store
<i>Sodium Hydroxide</i>	<i>1310-73-2</i>	<i>R35</i>	-	<i>H290, H314</i>			
<i>Sodium Hypochlorite Solution</i>	<i>7681-52-9</i>	<i>R34 R31, R50</i>	-	<i>H290, H314, H400, H411</i>			

BASELINE REPORT - SCR
FOYLE LTD, CINDERFORD, GLOUCESTER, UK

MATERIAL/ SUBSTANCE	CAS NUMBER	R-PHRASE	S-PHRASE	HAZARD STATEMENT	VOLUME STORED	NATURE OF USE	STORAGE LOCATION
<i>Alkyl Dimethyl Amine Oxide</i>	308062-28-4	R22, R38, R41, R50/53	-	H302, H315, H318, H400, H411			
<i>Sodium Aryl Sulphonate</i>	1300-72-7	R36/37/38	-	H319			
DESCALER	-	R36/37/38	S26, S60, S24/25	-			
<i>Hydrochloric Acid</i>	7647-01-0	R34, R37	-	H290, H314, H335	20 L	Descaler	Chemical Store
DRYSAN OXY	-	-	-	-			
<i>Hydrogen peroxide</i>	7722-84-1	-	-	H271, H302, H332, H314	20 L	Biocide	Chemical Store
OPTIMUM HANDSAN	-	-	-	-			
<i>2-Phenoxyethanol</i>	122-99-6	R22, R34, R50	-	-	10 L	Alcohol Free Hand Sanitiser	Chemical Store
ACTIVE WIPES	-	-	-	-			
<i>Ethylenediaminetetraacetic Acid Tetrasodium Salt</i>	64-02-8	R20, R22, R35, R38, R36/37/38,	-	-	25 Kgs	Wipe Disinfectants	Chemical Store
<i>N-(3-Aminopropyl)-N-Dodecylpropane-1,3-Diamine</i>	2372-82-9	R41, R50, R48/22	-	-			

BASELINE REPORT - SCR
FOYLE LTD, CINDERFORD, GLOUCESTER, UK

MATERIAL/ SUBSTANCE	CAS NUMBER	R-PHASE	S-PHASE	HAZARD STATEMENT	VOLUME STORED	NATURE OF USE	STORAGE LOCATION
<i>Sodium Aryl Sulphonate</i>	<i>1300-72-7</i>		-	-			
<i>Sodium Hydroxide</i>	<i>1310-73-2</i>		-	-			
OPTIMUM LEMON GEL	-	-	-	-	5 L	Detergent	Chemical Store
-	-	-	-	-			
OPTIMUM M7 HANDSOAP	-	-	-	-	20 L	Hand Soap	Chemical Store
<i>Aqua,</i>	-		-	-			
<i>Alkyl ether sulphate,</i>	-		-	-			
<i>Cocamidopropyl Betaine,</i>	-		-	-			
<i>Mono Propylene Glycol,</i>	-		-	-			
<i>Cocamide DEA,</i>	-		-	-			
<i>Sodium Lauroyl Sarcosinate,</i>	-	<i>R36/38,</i>	-	-			
<i>Polyquaternium 39,</i>	-	<i>R41, R38</i>	-	-			
<i>Phenoxyethanol,</i>	-		-	-			
<i>DMDM Hydantoin,</i>	-		-	-			
<i>Citric Acid, Disodium EDTA,</i>	-		-	-			
<i>CI 42090,</i>	-		-	-			
<i>CI 47005</i>	-		-	-			
OPTIMUM M8 HAND MOUSSE	-	-	S25, S26	-	20 L	Hand Soap	Chemical Store
<i>LAURYL BETAINE</i>	<i>683-10-3</i>	<i>R36/38,</i> <i>R41</i>	-	<i>H315, H318,</i> <i>H319</i>			

BASELINE REPORT - SCR
FOYLE LTD, CINDERFORD, GLOUCESTER, UK

MATERIAL/ SUBSTANCE	CAS NUMBER	R-PHASE	S-PHASE	HAZARD STATEMENT	VOLUME STORED	NATURE OF USE	STORAGE LOCATION
MAXIFOAM	-	R34	S24/25, S26, S36/37/39, S45, S60	-	125 kg	Detergent	Chemical Store
<i>Sodium Aryl Sulphonate</i>	<i>1300-72-7</i>	<i>R36/37/38</i>	-	<i>H315, H319, H335</i>			
<i>Sodium Hydroxide</i>	<i>1310-73-2</i>	<i>R35</i>	-	<i>H314</i>			
<i>Alkyl Di-Methyl Amine Oxide</i>	<i>70592-80-2</i>	<i>R38, R41, R50</i>	-	<i>H315, H318, H400</i>			
<i>Sodium Alkyl Ether Sulphate</i>	<i>68891-38-3</i>	<i>R36/38</i>	-	<i>H315, H318</i>			
<i>Sodium Octanoate</i>	<i>1984-06-1</i>	<i>R35/37/38</i>	-	<i>H315, H319, H335</i>			
<i>Sodium Decanoate</i>	<i>1002-62-6</i>	<i>R36/37/38</i>	-	<i>H315, H319, H335</i>			
<i>1-Dodecanol</i>	<i>112-53-8</i>	<i>R36,R50</i>	-	<i>H319, H400</i>			
HOLQUAT	-	R36/38, R50	S24/25, S26, S37, S49, S57, S60, S61	-	2,000 L	Disinfectant	Chemical Store
<i>Ethylenediaminetetraacetic Acid Tetrasodium Salt</i>	<i>64-02-8</i>	<i>R20, R22, R41</i>	-	<i>H290, H302, H332, H319</i>			

BASELINE REPORT - SCR
FOYLE LTD, CINDERFORD, GLOUCESTER, UK

MATERIAL/ SUBSTANCE	CAS NUMBER	R-PHASE	S-PHASE	HAZARD STATEMENT	VOLUME STORED	NATURE OF USE	STORAGE LOCATION
<i>Alkyl Benzyl Dimethyl Ammonium Chloride</i>	63449-41-2	<i>R21/22, R34, R50</i>	-	<i>H302, H312, H314, H400</i>			
<i>Alcohol Ethoxylate</i>	68131-39-5	<i>R41, R50</i>	-	<i>H302, H318, H400</i>			
TRIBAC	-	-	-	H290, H315, H318, H400, H411			
<i>Ethylenediaminetetraacetic Acid Tetrasodium Salt</i>	64-02-8	<i>R20, R22, R41</i>	-	<i>H302, H332, H318</i>	475 kg	Disinfectant	Chemical Store
<i>N-(3-Aminopropyl)-N-Dodecylpropane-1,3-Diamine</i>	2372-82-9	<i>R48/22, R35, R50</i>	-	<i>H301, H314, H373, H400</i>			
<i>Sodium Aryl Sulphonate</i>	1300-72-7	<i>R36/37/38</i>	-	<i>H319</i>			
<i>Sodium Hydroxide</i>	1310-73-2	<i>R35</i>	-	<i>H290, H314</i>			
PERBAC	-	R20/21/22, R34, R8	S17, S26, S24/25, S36/37/39, S45, S51, S60, S14, S3/7	-	100 L	Disinfectant	Chemical Store
<i>Hydrogen Peroxide Solution ... %</i>	7722-84-1	<i>R5, R8, R35, R20/22</i>	-	<i>H271, H302, H332, H314, H335</i>			

BASELINE REPORT - SCR
FOYLE LTD, CINDERFORD, GLOUCESTER, UK

MATERIAL/ SUBSTANCE	CAS NUMBER	R-PHASE	S-PHASE	HAZARD STATEMENT	VOLUME STORED	NATURE OF USE	STORAGE LOCATION
<i>Acetic Acid</i>	64-19-7	R35, R10	-	H226, H314			
<i>Peracetic Acid</i>	79-21-0	R20/21/22, R35,R7, R50, R10	-	H226, H242, H302, H312, H332, H314, H400			
PERBAC OPD	-	R22, R34	S3/7, S14, S24/25, S26, S45 S36/37/39, S60	-			
<i>Acetic Acid</i>	64-19-7	R35, R10	-	H226, H314	75 kg	Disinfectant	Chemical Store
<i>Hydrogen Peroxide Solution...%</i>	7722-84-1	R5, R8, R35, R20/22	-	H271, H302, H332, H314, H335			
<i>Benzenesulphonic Acid C10-C13-sec-alkyl derivatives</i>	85536-14-7	R22, R34	-	H302, H314			
<i>Alcohols C6-12 Ethoxylated</i>	68439-45-2	R22, R41	-	H302, H318			
<i>Peracetic Acid</i>	79-21-0	R20/21/22, R35, R7, R50, R10	-	H226, H242, H302, H312, H332, H314, H400			

BASELINE REPORT - SCR
FOYLE LTD, CINDERFORD, GLOUCESTER, UK

MATERIAL/ SUBSTANCE	CAS NUMBER	R-PHASE	S-PHASE	HAZARD STATEMENT	VOLUME STORED	NATURE OF USE	STORAGE LOCATION
FARMSAN	-	-	-	H314, H318	25 kg	Disinfectant	
<i>Alcohol (C9-11) Ethoxylate (8EO)</i>	68439-46-3	R22, R41	-	H318, H302			
<i>Phosphoric Acid</i>	7664-38-2	R34	-	H290, H314, H318			
<i>Sulphuric Acid</i>	7664-93-9	R35	-	H290, H314			
<i>Iodine</i>	7553-56-2	R20/21, R50	-	H312, H332, H315, H400			
ETP Chemicals							
FERRIC SULPHATE	7705-08-0	R36/37	S24/25, S26, S36/37/39	-	4,000 L	Coagulant	ETP
-	-	-	-	-			
CAUSTIC 32%	-	-	-	H290, H314, H318	3,000 L	pH Correction	ETP
<i>Sodium Hydroxide</i>	1310-73-2	R35		H290, H314, H318			
POLYMER	-	R46/48	S37/39	-	250 kg	Flocculent	ETP
-	-	-	-	-			

BASELINE REPORT - SCR
FOYLE LTD, CINDERFORD, GLOUCESTER, UK

STAGE 2 – IDENTIFICATION OF RELEVANT HAZARDOUS SUBSTANCES

2.0 Relevant Hazardous Substances

Relevant hazardous substances are those substances or mixtures defined within Article 3 of Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP Regulation) which, as a result of their hazardousness, mobility, persistence and biodegradability (as well as other characteristics), are capable of contaminating soil or groundwater and are used, produced and/or stored by the installation.

Table 2.1: Identifying Relevant Hazardous Substances

MATERIAL/ SUBSTANCE	R-PHASE	HAZARD STATEMENT	RATIONALE FOR INCLUSION / EXCLUSION OF MATERIAL / SUBSTANCE	RELEVANT HAZARDOUS SUBSTANCE
NOPAC	R34	-	This substance is not considered to constitute a relevant hazardous substance. This product is not classified as environmentally hazardous.	x
<i>Methanesulphonic Acid</i>	<i>R34</i>	<i>H314</i>		
TWS	R35	-	This substance is not considered to constitute a relevant hazardous substance. This product is not classified as environmentally hazardous.	x
<i>Sodium Hydroxide</i>	<i>R35</i>	<i>H314</i>		
RAPIER	-	H290, H314, H318, H400, H412	This substance is considered to constitute a relevant hazardous substance. This product is classified Very toxic to aquatic life & Harmful to aquatic life with long lasting effects.	✓
<i>Sodium Hydroxide</i>	<i>R35</i>	<i>H290, H314</i>		
<i>Sodium Hypochlorite Solution</i>	<i>R34 R31, R50</i>	<i>H290, H314, H400, H411</i>		
<i>Alkyl Dimethyl Amine Oxide</i>	<i>R22, R38, R41, R50/53</i>	<i>H302, H315, H318, H400, H411</i>		
<i>Sodium Aryl Sulphonate</i>	<i>R36/37/38</i>	<i>H319</i>		
DESCALER	R36/37/38	-	This substance is not considered to constitute a relevant hazardous substance. This product is not classified as environmentally hazardous.	x
<i>Hydrochloric Acid</i>	<i>R34, R37</i>	<i>H290, H314, H335</i>		

BASELINE REPORT - SCR
FOYLE LTD, CINDERFORD, GLOUCESTER, UK

MATERIAL/ SUBSTANCE	R-PHASE	HAZARD STATEMENT	RATIONALE FOR INCLUSION / EXCLUSION OF MATERIAL / SUBSTANCE	RELEVANT HAZARDOUS SUBSTANCE
DRYSAN OXY	-	-	<p>This substance is not considered to constitute a relevant hazardous substance.</p> <p>This product is not classified as environmentally hazardous.</p>	X
<i>Hydrogen peroxide</i>	-	<i>H271, H302, H332, H314</i>		
OPTIMUM HANDSAN	-	-	<p>This substance is not considered to constitute a relevant hazardous substance.</p> <p>This product is not classified as environmentally hazardous.</p>	X
<i>2-Phenoxyethanol</i>	<i>R22, R34, R50</i>	-		
ACTIVE WIPES	-	-	<p>This substance is not considered to constitute a relevant hazardous substance.</p> <p>This product is not classified as environmentally hazardous.</p>	X
<i>Ethylenediaminetetraacetic Acid Tetrasodium Salt</i>	-	-		
<i>N-(3-Aminopropyl)-N-Dodecylpropane-1,3-Diamine</i>	<i>R20, R22, R35, R38, R36/37/38</i>	-		
<i>Sodium Aryl Sulphonate</i>	<i>R41, R50, R48/22</i>	-		
<i>Sodium Hydroxide</i>	-	-		
OPTIMUM LEMON GEL	-	-	<p>This substance is not considered to constitute a relevant hazardous substance.</p> <p>This product is not classified as environmentally hazardous.</p>	X
-	-	-		
OPTIMUM M7 HANDSOAP	-	-	<p>This substance is not considered to constitute a relevant hazardous substance.</p> <p>This product is not classified as environmentally hazardous.</p>	X
<i>Aqua,</i> <i>Alkyl ether sulphate,</i> <i>Cocamidopropyl Betaine,</i> <i>Mono Propylene Glycol,</i> <i>Cocamide DEA,</i> <i>Sodium Lauroyl Sarcosinate,</i> <i>Polyquaternium 39,</i> <i>Phenoxyethanol,</i> <i>DMDM Hydantoin,</i> <i>Citric Acid, Disodium EDTA,</i>	<i>R36/38, R41, R38</i>	- - - - - - - - -		

BASELINE REPORT - SCR
FOYLE LTD, CINDERFORD, GLOUCESTER, UK

MATERIAL/ SUBSTANCE	R-PHASE	HAZARD STATEMENT	RATIONALE FOR INCLUSION / EXCLUSION OF MATERIAL / SUBSTANCE	RELEVANT HAZARDOUS SUBSTANCE
<i>CI 42090,</i> <i>CI 47005</i>		- -		
OPTIMUM M8 HAND MOUSSE	-	-	This substance is not considered to constitute a relevant hazardous substance.	x
<i>LAURYL BETAINE</i>	<i>R36/38,</i> <i>R41</i>	<i>H315, H318,</i> <i>H319</i>	This product is not classified as environmentally hazardous.	
MAXIFOAM	R34	-	This substance is not considered to constitute a relevant hazardous substance. This product is not classified as environmentally hazardous.	x
<i>Sodium Aryl Sulphonate</i>	<i>R36/37/38</i>	<i>H315, H319,</i> <i>H335</i>		
<i>Sodium Hydroxide</i>	<i>R35</i>	<i>H314</i>		
<i>Alkyl Di-Methyl Amine Oxide</i>	<i>R38, R41,</i> <i>R50</i>	<i>H315, H318,</i> <i>H400</i>		
<i>Sodium Alkyl Ether Sulphate</i>	<i>R36/38</i>	<i>H315, H318</i>		
<i>Sodium Octanoate</i>	<i>R35/37/38</i>	<i>H315, H319,</i> <i>H335</i>		
<i>Sodium Decanoate</i>	<i>R36/37/38</i>	<i>H315, H319,</i> <i>H335</i>		
<i>1-Dodecanol</i>	<i>R36,R50</i>	<i>H319, H400</i>		
HOLQUAT	R36/38, R50	-	This substance is considered to constitute a relevant hazardous substance. This product is classified very toxic to aquatic organisms.	✓
<i>Ethylenediaminetetraacetic Acid Tetrasodium Salt</i>	<i>R20, R22,</i> <i>R41</i>	<i>H290, H302,</i> <i>H332, H319</i>		
<i>Alkyl Benzyl Dimethyl Ammonium Chloride</i>	<i>R21/22,</i> <i>R34, R50</i>	<i>H302, H312,</i> <i>H314, H400</i>		
<i>Alcohol Ethoxylate</i>	<i>R41, R50</i>	<i>H302, H318,</i> <i>H400</i>		

BASELINE REPORT - SCR
FOYLE LTD, CINDERFORD, GLOUCESTER, UK

MATERIAL/ SUBSTANCE	R-PHASE	HAZARD STATEMENT	RATIONALE FOR INCLUSION / EXCLUSION OF MATERIAL / SUBSTANCE	RELEVANT HAZARDOUS SUBSTANCE
TRIBAC	-	H290, H315, H318, H400, H411	<p>This substance is considered to constitute a relevant hazardous substance.</p> <p>This product is classified very toxic to aquatic life & toxic to aquatic life with long lasting effects.</p>	✓
<i>Ethylenediaminetetraacetic Acid Tetrasodium Salt</i>	<i>R20, R22, R41</i>	<i>H302, H332, H318</i>		
<i>N-(3-Aminopropyl)-N-Dodecylpropane-1,3-Diamine</i>	<i>R48/22, R35, R50</i>	<i>H301, H314, H373, H400</i>		
<i>Sodium Aryl Sulphonate</i>	<i>R36/37/38</i>	<i>H319</i>		
<i>Sodium Hydroxide</i>	<i>R35</i>	<i>H290, H314</i>		
PERBAC	R20/21/22 R34, R8	-	<p>This substance is not considered to constitute a relevant hazardous substance.</p> <p>This product is not classified as environmentally hazardous.</p>	✗
<i>Hydrogen Peroxide Solution ... %</i>	<i>R5,R8,R35, R20/22</i>	<i>H271, H302, H332, H314, H335</i>		
<i>Acetic Acid</i>	<i>R35, R10</i>	<i>H226, H314</i>		
<i>Peracetic Acid</i>	<i>R20/21/22, R35,R7, R50, R10</i>	<i>H226, H242, H302, H312, H332, H314, H400</i>		
PERBAC OPD	R22, R34	-	<p>This substance is not considered to constitute a relevant hazardous substance.</p> <p>This product is not classified as environmentally hazardous.</p>	✗
<i>Acetic Acid</i>	<i>R35, R10</i>	<i>H226, H314</i>		
<i>Hydrogen Peroxide Solution...%</i>	<i>R5, R8, R35, R20/22</i>	<i>H271, H302, H332, H314, H335</i>		
<i>Benzenesulphonic Acid C10-C13-sec-alkyl derivatives</i>	<i>R22, R34</i>	<i>H302, H314</i>		
<i>Alcohols C6-12 Ethoxylated</i>	<i>R22, R41</i>	<i>H302, H318</i>		
<i>Peracetic Acid</i>	<i>R20/21/22, R35, R7, R50, R10</i>	<i>H226, H242, H302, H312, H332, H314, H400</i>		

BASELINE REPORT - SCR
FOYLE LTD, CINDERFORD, GLOUCESTER, UK

MATERIAL/ SUBSTANCE	R-PHASE	HAZARD STATEMENT	RATIONALE FOR INCLUSION / EXCLUSION OF MATERIAL / SUBSTANCE	RELEVANT HAZARDOUS SUBSTANCE
FARMSAN	-	H314, H318		
<i>Alcohol (C9-11) Ethoxylate (8EO)</i>	<i>R22, R41</i>	<i>H318, H302</i>	<p>This substance is not considered to constitute a relevant hazardous substance.</p> <p>This product is not classified as environmentally hazardous.</p>	x
<i>Phosphoric Acid</i>	<i>R34</i>	<i>H290, H314, H318</i>		
<i>Sulphuric Acid</i>	<i>R35</i>	<i>H290, H314</i>		
<i>Iodine</i>	<i>R20/21, R50</i>	<i>H312, H332, H315, H400</i>		
FERRIC SULPHATE	R36/37	-		
-	-	-	<p>This substance is not considered to constitute a relevant hazardous substance.</p> <p>This product is not classified as environmentally hazardous.</p>	x
CAUSTIC 32%	-	H290, H314, H318		
Sodium Hydroxide	<i>R35</i>	<i>H290, H314, H318</i>	<p>This substance is not considered to constitute a relevant hazardous substance.</p> <p>This product is not classified as environmentally hazardous.</p>	x
POLYMER	R46/48	-		
-	-	-	<p>This substance is not considered to constitute a relevant hazardous substance.</p> <p>This product is not classified as environmentally hazardous.</p>	x

BASELINE REPORT - SCR

FOYLE LTD, CINDERFORD, GLOUCESTER, UK

3.0 STAGE 3 – ASSESSMENT OF SITE SPECIFIC POLLUTION POSSIBILITY

The European Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on Industrial Emissions” (2014/C 136/03) provides a definition of the phrase ‘**The possibility of soil and groundwater contamination at the site of the installation**’ as follows;

“(Article 22(2), first subparagraph) covers a number of important elements. Firstly, due consideration should be given in a baseline report to the quantities of hazardous substances concerned – where very small quantities are used, produced or released on the site of the installation then the possibility of contamination is likely to be insignificant for the purpose of producing a baseline report. Secondly, baseline reports must consider the soil and groundwater characteristics of the site and the impact of those characteristics on the possibility of soil and groundwater contamination taking place. Thirdly, for existing installations, their characteristics may be considered where they are such that it is impossible in practice that contamination can take place.”

A review of Article 3 of Regulation (EC) No 1272/2008 was undertaken and the following substances have been brought forward from Stage 2 having been identified as relevant hazardous substances:

BASELINE REPORT - SCR
FOYLE LTD, CINDERFORD, GLOUCESTER, UK

Table 3.1: Environmental Effect of Relevant Hazardous Substances

MATERIAL/ SUBSTANCE	R-PHRASE	HAZARD STATEMENT	VOLUME STORED	NATURE OF USE	STORAGE LOCATION	CONTROLS IN PLACE
RAPIER	-	H290, H314, H318, H400, H412	600 kg	Detergent	Chemical Store	Small volumes in use at any one time.
<i>Sodium Hydroxide</i>	<i>R35</i>	<i>H290, H314</i>				Bulk Liquids procedure in place (EMS OP08)
<i>Sodium Hypochlorite Solution</i>	<i>R34 R31, R50</i>	<i>H290, H314, H400, H411</i>				Spill kits located throughout site.
<i>Alkyl Dimethyl Amine Oxide</i>	<i>R22, R38, R41, R50/53</i>	<i>H302, H315, H318, H400, H411</i>				Spillage procedure in place (EMS OP12)
<i>Sodium Aryl Sulphonate</i>	<i>R36/37/38</i>	<i>H319</i>				All internal drainage is directed to the ETP. All bulk chemical are stored on bunds.
HOLQUAT	R36/38, R50	-	2,000 L	Disinfectant	Chemical Store	Small volumes in use at any one time.
<i>Ethylenediaminetetraacetic Acid Tetrasodium Salt</i>	<i>R20, R22, R41</i>	<i>H290, H302, H332, H319</i>				Bulk Liquids procedure in place (EMS OP08)
<i>Alkyl Benzyl Dimethyl Ammonium Chloride</i>	<i>R21/22, R34, R50</i>	<i>H302, H312, H314, H400</i>				Spill kits located throughout site.
<i>Alcohol Ethoxylate</i>	<i>R41, R50</i>	<i>H302, H318,</i>				Spillage procedure in place (EMS OP12)

BASELINE REPORT - SCR
FOYLE LTD, CINDERFORD, GLOUCESTER, UK

MATERIAL/ SUBSTANCE	R-PHASE	HAZARD STATEMENT	VOLUME STORED	NATURE OF USE	STORAGE LOCATION	CONTROLS IN PLACE
		<i>H400</i>				All internal drainage is directed to the ETP. All bulk chemical are stored on bunds
TRIBAC	-	H290, H315, H318, H400, H411				Small volumes in use at any one time.
<i>Ethylenediaminetetraacetic Acid Tetrasodium Salt</i>	<i>R20, R22, R41</i>	<i>H302, H332, H318</i>	475 kg	Disinfectant	Chemical Store	Bulk Liquids procedure in place (EMS OP08)
<i>N-(3-Aminopropyl)-N-Dodecylpropane-1,3-Diamine</i>	<i>R48/22, R35, R50</i>	<i>H301, H314, H373, H400</i>				Spill kit located throughout site.
<i>Sodium Aryl Sulphonate</i>	<i>R36/37/38</i>	<i>H319</i>				Spillage procedure in place (EMS OP12)
<i>Sodium Hydroxide</i>	<i>R35</i>	<i>H290, H314</i>				All internal drainage is directed to the ETP. All bulk chemical are stored on bunds.

BASELINE REPORT - SCR

FOYLE LTD, CINDERFORD, GLOUCESTER, UK

4.0 STORAGE, USAGE, CONTAINMENT MEASURES AND POTENTIAL RISKS OF RELEASE TO THE ENVIRONMENT

As can be seen in Section 3.0 above, the volumes of relevant hazardous substances used on-site are relatively small. Chemical volumes stored on-site are sufficient for short term use, with a replacement supply on-site.

The supply of chemicals to the site is such that only the volumes required for on-going operation and, where applicable, replacement supplies are stored onsite at any one time. There is no bulk storage of relevant hazardous substances at the site.

A procedure is in place at the site for monitoring '*The Receipt of Bulk Oil and Containerised Oil and Chemicals*', to reduce the risk of spillages taking place to a minimum (EMS OP08). Accident traffic management controls and speed limits are in place on site. Low traffic volumes and congestion on site also reduce the risk of spillages occurring.

In the event of a spill, spill kits are in place in key areas around the site. The Non-Conformance, Corrective and Corrective Action Procedure (EM15) and Emergency Response Procedure (EM16) detail the company's response to "day to day" emergencies.

All relevant hazardous substances are stored in secondary containment or within the main production building. Bunds are checked weekly and emptied of rainwater, as per the Bund Inspection Procedure (EMS OP09) and the Environmental daily check sheet (EMS ER 04).

Chemicals stored "internally to the building" are those in use. Internal drainage is directed to the site Effluent treatment plant.

All external yard areas where relevant hazardous chemicals may be stored are surfaced with concrete or asphalt. The site contains no green areas and the site is bound/enclosed by elevated curbing. There are no discharges to soil or groundwater within the site boundary. See attachment B.3.3 – Emissions to Surface water for further detail.

Details of site reconnaissance are provided in Attachment B.2.3.B - Section 3.0. Site investigations were conducted on Tuesday 23rd and Wednesday 24th April 2019. No evidence of contamination from relevant hazardous substances stored and used on the site was found. The hardstand area throughout the site was found to be in good condition during the investigation.

BASELINE REPORT - SCR

FOYLE LTD, CINDERFORD, GLOUCESTER, UK

4.1 Conclusion

There is no indication of pollution of soil or groundwater from relevant hazardous substances used at the site, consistent with the current land use and historic land use as an abattoir.

The existing facility is designed to ensure the protection of soil and groundwater. All materials handling is undertaken on appropriately surfaced yards or indoors and therefore there is a relatively low risk of soil or groundwater pollution arising during normal operations.

The quantity of the relevant substances stored on site at any one time is relatively minor.

The design of the facility combined with good environmental management practices on-site, as well as established environmental procedures, would ensure that the risk of any unplanned events is minimised.

It is apparent due to the quantities of the relevant hazardous substances used at the installation, combined with the measures taken at the facility to ensure that contamination of soil and groundwater would not occur, including containment measures, indoor processing activities, concrete hard standing and an environmental management system, that the likelihood of or potential for, contamination of soil or groundwater is extremely low.

It is therefore concluded that additional monitoring to set baseline reference data is not required.