



Ricardo
Energy & Environment

Bridge Road Food Factory: EP Variation

Site Condition Report

Report for Princes Limited
ED11556111

Customer:**Princes Limited****Customer reference:**

Canning Excellence

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1 Introduction

Ricardo Energy & Environment (Ricardo) has been retained by Princes Ltd (Princes) to prepare an application to vary existing Environmental Permit reference EPR/RP3534FP/V003, which authorises the operation of a Part A Installation (falling within the scope of the Industrial Emissions Directive (“IED”)) under the Environmental Permitting (England and Wales) Regulations 2016, at the Bridge Road Food Factory, Long Sutton, Lincolnshire PE12 9EQ. This document has been prepared in conjunction with Princes.

The existing installation currently comprises a factory for the receipt and preparation of foods canned for human consumption and a biological treatment plant for the treatment of site process effluent. The Long Sutton installation is Princes’ largest food production site in the UK.

A number of changes are proposed to site operations and infrastructure which are part of an ongoing programme of investment and modernisation of the site by Princes. The proposed changes include an extension to the permit boundary incorporating new land, for use as a new raw materials storage area and ingredients processing facility, and as such an application site condition report (SCR) is required to establish the baseline condition of the land in this new area.

This application SCR has been prepared in accordance with the Environment Agency’s (EA’s) H5 Guidance¹ on SCRs and Guidance notes on part C2 – General – varying a bespoke permit, using sections 1-3 of the H5 Template, below, to satisfy the requirement for a baseline report under IED for new land incorporated into the permit.

In accordance with the H5 Guidance and Article 22(2), the objective of the application SCR is to record and describe the condition of the land at the site prior to commencement of operations under the permit. The SCR will provide a point of reference and baseline environmental data so that when the permit is surrendered it can be demonstrated that there has been no deterioration in the condition of the land as a result of the proposed operations and ensure that the condition of the land is in a ‘satisfactory state’ on surrender of the permit.

1.1 H5 Site Condition Report Template, Relevant Sections 1-3

1.0 SITE DETAILS	
Name of the applicant	Princes Limited
Activity address	Bridge Road Food Factory Long Sutton Lincolnshire PE12 9EQ
National grid reference	National Grid Reference TF 45026 22204
Document reference and dates for Site Condition Report at permit application and surrender	Section 1.3 IPPC Application Site Condition Report March 2005. Appendix SCR1 Permit variation application V004, March 2020, Section 5 – SCR reference ED11556111
Document references for site plans (including location and boundaries)	Permit Application 2005 - Drawing No. NL07182/LS/17

¹[EPR H5 Site Condition Report - Guidance and Templates, April 2013](#)

	Permit variation application V004, January 2020, Section 6 – Installation Boundary Plan.
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Note:

In Part A of the application form you must give us details of the site's location and provide us with a site plan. We need a detailed site plan (or plans) showing:

- Site location, the area covered by the site condition report, and the location and nature of the activities and/or waste facilities on the site.
- Locations of receptors, sources of emissions/releases, and monitoring points.
- Site drainage.
- Site surfacing.

If this information is not shown on the site plan required by Part A of the application form then you should submit the additional plan or plans with this site condition report.

2.0 Condition of the land at permit issue	
<p>Environmental setting including:</p> <ul style="list-style-type: none"> • geology • hydrogeology • surface waters 	<p>Section 1.3.6. of the Application SCR (appendix SCR1) identified the environmental setting (geological sequence, hydrogeology and surface waters) is as follows:</p> <ul style="list-style-type: none"> • Made ground, probably laterally discontinuous and restricted to inert sub base; • In the region of 16m of superficial deposits, sands, gravels and shells; • Ampthill Clays of the Jurassic era. <p>The Groundwater Vulnerability map for the area (Sheet 25, West Norfolk) shows the site to be located on a non-aquifer.</p> <p>There are various small surface water features both abutting the site and in close proximity to the site. These take the forms of drainage dykes that drain the surrounding low lying flat arable lands. In particular there are dykes to the east and west of the site. There was no record of any water courses with a notified water quality classification within 1km of the site.</p> <p>Groundwater within the superficial deposits beneath the site is considered to be in hydraulic continuity with the Ampthill Clay. The groundwater within the superficial deposits is anticipated to be in hydraulic continuity with the adjacent surface water drainage dyke.</p>
<p>Pollution history including:</p> <ul style="list-style-type: none"> • pollution incidents that may have affected land • historical land-uses and associated contaminants • any visual/olfactory evidence of existing contamination • evidence of damage to pollution prevention measures 	<p>The pollution history of the site, including historic land uses and pollution incident records is set out in detail in Section 1.3.3 of the Application Site Condition Report, (Appendix SCR1).</p> <p>A site reconnaissance was undertaken on the 29th January 2005. The results of which are detailed in section 1.3.4 of the Application Site Condition Report, (Appendix SCR1).</p>

	<p>The overall site was in agricultural use until approximately 1938. The land subject to the permit boundary extension was identified as having glass houses between 1972 and 1991.</p>
<p>Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)</p>	<p>Table 1.3.3 of the Application Site Condition Report, (Appendix SCR1), identified relevant activities and three site zones where there is a possibility that there is or may be current or future pollution of the land from the installation.</p>
<p>Baseline soil and groundwater reference data</p>	<p>Phase 2 Site investigation work was carried out by Solmek Ltd in May 2018 (See Appendix SCR2) on the portion of additional land to be incorporated into the permit boundary to the east of the existing installation. Fieldwork was carried out commencing on the 17th April 2018 and comprised:</p> <ul style="list-style-type: none"> - 29no. hand dug boreholes (BH01 to BH29) drilled to a maximum depth of 1.00m below ground level (bgl). - 18no. machine excavated trial pits (TP) within soft landscaping (TP01 to TP18 inclusive) excavated to a maximum depth of 1.10mbgl. <p>The borehole and trial pit locations were selected to target specific areas of potential contamination. Disturbed samples were retrieved for laboratory testing.</p> <p>Ground conditions in the extension area were found to be as follows:</p> <ul style="list-style-type: none"> - Made ground was proven to max. of 1.10mbgl generally in and adjacent to spoil piles. - Made ground beneath hardstanding in boreholes generally between 0.20m and 0.40mbgl and consisted of sub angular to sub rounded sand and gravel dolomite or flint fill. - TPs 16-18 encountered orange and grey stone fill with angular brick and concrete cobbles and boulders. - Natural deposits were generally brown sandy silty clay overlain locally by brown clayey sand. Perched groundwater in TP08 within Made Ground. <p>In summary, the results of analysis on the laboratory testing showed the following:</p> <ul style="list-style-type: none"> - Thirteen samples tested for metal, PAH and TPH. - Slightly elevated values were returned for Dibenzo (a, h) anthracene (BH14 0.20-0.40m). Remainder of values were below threshold levels. - 50no. samples tested for asbestos, one sample (BH25 0.20-0.40m) returned 3.91% chrysotile. No asbestos was recorded in the remainder of the samples tested. - Slightly alkaline to alkaline pH • Sulphates <10 to 334mg/l.

	<p>Made ground is likely to be either removed during site works or encapsulated beneath concrete aprons as part of development. As such they are considered unlikely to pose a risk to current or future users of the site. Sub surface concrete used as part of the development should be designed to DS-1, ACEC (Class AC-1).</p>
<p>Supporting information</p>	<ul style="list-style-type: none"> • Source information identifying environmental setting and pollution incidents • Historical Ordnance Survey plans • Site reconnaissance • Historical investigation / assessment / remediation / verification reports • Baseline soil and groundwater reference data

<h3>3.0 Permitted activities</h3>	
<p>Permitted activities</p>	<p>The installation currently comprises a factory for the receipt and preparation of foods canned for human consumption and a biological treatment plant for the treatment of process effluent.</p> <p>Listed activities are Section 6.8 A(1)(d)(ii) - treating and processing materials intended for the production of food products from vegetable raw materials and Section 5.4 A(1)(a)(i) - disposal of non-hazardous waste in a facility with a capacity exceeding 50 tonnes per day biological treatment (D8).</p>
<p>Non-permitted activities undertaken</p>	<p>none</p>
<p>Document references for:</p> <ul style="list-style-type: none"> • plan showing activity layout; and • environmental risk assessment. 	<p>Permit Application 2005 - Drawing No. NL07182/LS/17.</p> <p>Permit variation application V004, January 2020, Section 6 – Installation Boundary Plan.</p> <p>Section 4 - Environmental Risk Assessment ED11556111, March 2020</p> <p>The application site condition report (Appendix SCR1) identified dangerous substances from the installation in Table 1.3.4.</p> <p>These include heating oil, caustic soda (NaOH), calcium chloride, Mineral oils and PCBs.</p> <p>The Environmental Risk Assessment prepared in support of permit variation application V004, January 2020 (see section 4), did not identify any additional relevant hazardous substances, that could be used, produced or released by the installation as a result of the proposed permit variation.</p>

Note:

In Part B of the application form you must tell us about the activities that you will undertake at the site. You must also give us an environmental risk assessment. This risk assessment must be based on our guidance (*Environmental Risk Assessment - EPR H1*) or use an equivalent approach.

It is essential that you identify in your environmental risk assessment all the substances used and produced that could pollute the soil or groundwater if there were an accident, or if measures to protect land fail.

These include substances that would be classified as 'dangerous' under the Control of Major Accident Hazards (COMAH) regulations and also raw materials, fuels, intermediates, products, wastes and effluents.

If your submitted environmental risk assessment does not adequately address the risks to soil and groundwater we may need to request further information from you or even refuse your permit application.

1.2 Conclusion

The facility will operate with due regard to the conditions of the environmental permit and all relevant environmental legislation to ensure that land and groundwater is protected during the lifetime of the site and that the land is in a satisfactory state when the permit is eventually surrendered.

The possibility of any significant releases to the ground occurring during the lifetime of the permit is therefore limited. All activities within the permit extension area will take place on areas of impermeable concrete to eliminate potential direct pathways to soil and groundwater. Minor spillages of potentially polluting materials, if they occur, are dealt with immediately by trained staff using appropriate spill response procedure and spill kits located around the site. The impermeable concrete site surfacing will locally break any potential pathway for contaminants that could be emitted from the permitted activities to land or groundwater. A Phase 2 Site Investigation Report has been provided to establish the baseline condition of the proposed installation extension area prior to commencement of operations under the varied permit.

In accordance with the H5 guidance, Princes maintain the records required by Sections 4-7 of the EA SCR template, including the measures taken to protect land and any pollution incidents that may have had an impact on land, and their remediation, in preparation for permit surrender in due course.

Appendices

Appendix SCR1: IPPC Application Site Condition Report
Appendix SCR2: Phase 2 Site Investigation Report

Appendix 1 – IPPC Application Site Condition Report

Appendix SCR2 - Phase 2 Site Investigation Report



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