

# **SITE CONDITION REPORT TEMPLATE**

For full details, see H5 *SCR guide for applicants* v2.0 4 August 2008

**COMPLETE SECTIONS 1-3 AND SUBMIT WITH APPLICATION**

**DURING THE LIFE OF THE PERMIT: MAINTAIN SECTIONS 4-7**

**AT SURRENDER: ADD NEW DOC REFERENCE IN 1.0; COMPLETE SECTIONS 8-10; & SUBMIT WITH YOUR SURRENDER APPLICATION.**

<b>1.0 SITE DETAILS</b>	
Name of the applicant	Albright Transfer Station Limited
Activity address	Unit 6, Albright Industrial Estate, Ferry Lane North, Rainham, RM13 9BU.
National grid reference	TQ51697 81918
Document reference and dates for Site Condition Report at permit application and surrender	ATS-SCR-03 April 2025 Previous versions ATS-SCR-02 July 2022 ATS-SCR-01 June 2020. 9 March 2017.
Document references for site plans (including location and boundaries)	ATSL-FL-EP-02

**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.

<b>2.0 Condition of the land at permit issue</b>	
Environmental setting including: <ul style="list-style-type: none"> <li>• geology</li> <li>• hydrogeology</li> <li>• surface waters</li> </ul>	<p>The Bedrock Geology comprises of the London Clay Formation. The Superficial Deposits comprise of Alluvium.</p> <p>The underlying superficial deposits are a Secondary Undifferentiated. The bedrock geology is unproductive. The groundwater vulnerability is Medium-Low. There are no Groundwater Source Protection Zones in the vicinity of the site. The groundwater is therefore a low risk receptor.</p> <p>The River Thames is approximately 1.1km south of the site. Rainham Creek is approximately 100m North West of the site, flowing in a southerly direction towards the Thames.</p> <p>The site infrastructure was designed, prior to occupancy and use as a waste transfer facility, to protect the water. The site surface</p>

	<p>is constructed of concrete with falls via interceptors and discharges to the foul sewer.</p> <p>There are no current potable water supply abstraction points within 2000m of the site.</p> <p>There are no known surface water abstraction points within 1000m of the site.</p> <p>There are no reported breaches of the site infrastructure, see below, or pollution incidents arising from site activities.</p>
<p>Pollution history including:</p> <ul style="list-style-type: none"> <li>• pollution incidents that may have affected land</li> <li>• historical land-uses and associated contaminants</li> <li>• any visual/olfactory evidence of existing contamination</li> <li>• evidence of damage to pollution prevention measures</li> </ul>	<p>The permit was originally granted in 1998 and has been subject to several variations and land extensions.</p> <p>This version has been used to support a variation to add hazardous waste treatment. Accordingly, no intrusive survey or investigation is required.</p> <p>There have been no pollution incidents at the site.</p>
<p>Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)</p>	<p>There is no evidence of historic contamination.</p>
<p>Baseline soil and groundwater reference data</p>	<p>No additional land is required. Site is fully concreted. No baseline soil or groundwater reference data required.</p>
<p><b>Supporting information</b></p>	<ul style="list-style-type: none"> <li>• Source information identifying environmental setting and pollution incidents</li> <li>• Historical Ordnance Survey plans</li> <li>• Site reconnaissance</li> <li>• Historical investigation / assessment / remediation / verification reports</li> <li>• Baseline soil and groundwater reference data</li> </ul>

<p><b>3.0 Permitted activities</b></p>	
<p>Permitted activities</p>	<p>The main waste site has a permit which allows waste storage and treatment, including washing.</p> <p>Non-hazardous waste recycling since c1990. Includes original permitted boundaries and extended boundary.</p> <p>It is proposed to add the following activities:</p> <p>Section 5.3 Part A (1) (a) (vi) recycling or reclamation of inorganic materials other than metals or metal compounds.</p> <p>Section 5.6 Part A(1) (a) Temporary storage of hazardous waste within a total capacity exceeding 50 tonnes</p>

Non-permitted activities undertaken	
Document references for: <ul style="list-style-type: none"> <li>• plan showing activity layout; and</li> <li>• environmental risk assessment.</li> </ul>	Plan showing layout is ATSL-FL-INF-01. The Risk Assessment is provided within document ATS-ERA20250-V1.

**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.

4.0 Changes to the activity	
Have there been any changes to the activity boundary?	The boundary was changed November 2020 <b>and in 2024.</b>
Have there been any changes to the permitted activities?	<p>In 2024, the permit was varied to make the following changes.</p> <ul style="list-style-type: none"> <li>• Change the Permit Boundary</li> <li>• Add Washing as a specified activity</li> <li>• Increase the annual throughput from 75,000 tpa to 150,000 tpa</li> <li>• Consolidate DP3896NH into the main permit YP3891NY</li> <li>• Add three waste codes: <ul style="list-style-type: none"> <li>o 170204* Wood containing or contaminated with dangerous substances</li> <li>o 170301* Bituminous mixtures containing coal tar</li> <li>o 191206* Wood containing dangerous substances</li> <li>o 200137* Wood containing dangerous substances</li> </ul> </li> </ul>
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	No
Checklist of supporting information	<ul style="list-style-type: none"> <li>• Plan showing any changes to the boundary (where relevant)</li> <li>• Description of the changes to the permitted activities (where relevant)</li> <li>• List of 'dangerous substances' used/produced by the permitted activities that were not identified in the Application Site Condition Report (where relevant) <b>See Below</b></li> </ul>

5.0 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	<ul style="list-style-type: none"> <li>• Inspection records and summary of findings of inspections for all pollution prevention measures</li> <li>• Records of maintenance, repair and replacement of pollution prevention measures</li> </ul>

6.0 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  
supporting  
information

of

- Records of pollution incidents that may have impacted on land
- Records of their investigation and remediation

7.0 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  
supporting  
information

- Description of soil gas and/or water monitoring undertaken
- Monitoring results (including graphs)

### 8.0 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	<ul style="list-style-type: none"><li>• Site closure plan</li><li>• List of potential sources of pollution risk</li><li>• Investigation and remediation reports (where relevant)</li></ul>
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### 9.0 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 sections 3, 4, 5 and 6 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	<ul style="list-style-type: none"><li>• Land and/or groundwater data collected at application (if collected)</li><li>• Land and/or groundwater data collected at surrender (where needed)</li><li>• Assessment of satisfactory state</li><li>• Remediation and verification reports (where undertaken)</li></ul>
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### 10.0 Statement of site condition

Using the information from sections 3 to 7, 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.



A stage 1 to 3 assessment is required to comply with the requirement for a baseline report in Schedule 7 (paragraph 5 [m]) in the Environmental Permitting Regulations.

If your stage 1 to 3 assessment identifies a risk to soil and groundwater we recommend baseline reference data is established for these substances and you do soil and groundwater monitoring during the life of your permit.

It is recommended that A1 installations who do not have hazardous substances complete the stage 1 to 3 assessment for any other potentially polluting substances.

This will help you demonstrate your site is in a satisfactory state when you apply to surrender all or part of your permit.

This sections provides the Stage 1 – 3 Assessment.

## **Background**

Schedule 7 to the EPR transposes the requirements of the Industrial Emissions Directive into domestic law. This requires Part A1 installations to complete a 'baseline report.'

To satisfy the requirement for a 'baseline report' Part A1 installations are required to produce a stage 1 - 3 assessment if they propose to use, produce or release any hazardous substances during the life of the permit to identify if there is a risk of pollution risk to soil and groundwater.

Where a risk to soil and groundwater is identified baseline reference data **must** be established and periodic soil and groundwater monitoring carried out – at a frequency to be agreed but every 10 and 5 years respectively as a minimum.

Whilst a periodic monitoring condition is included in all Part A1 installation permits this condition only becomes active when a risk from relevant hazardous substances is identified.

### **Stage 1 – Identify hazardous substances used on site**

You should produce a list of all hazardous substances you propose to use, produce or release within your site boundary.

Include raw materials, effluent discharges, products, intermediaries, by-products, emissions or wastes.

You should then determine which of the substances are classified as hazardous substances.

The operations will not involve the use, production or release of hazardous substances at the site. The installation will treat hazardous waste soils to separate soils and stones for recovery purposes. The hazardous waste soils will be from construction sites and may contain hydrocarbons or heavy metals. The site does not currently accept hazardous waste, but the proposed waste acceptance procedures have been set out in the EMS.

Hazardous waste soils are a varied waste stream and will be subject to robust pre-acceptance, checking, sampling and compliance testing.

The broad classification testing will include:

Asbestos, TPH, PAH, Heavy Metals, pH

For the waste accepted at the site, the main constituents are likely to include TPH, PAH and heavy metals.

There are no material data sheets. All waste accepted at the site will be classified and will include laboratory test certificates.

### Stage 2 – Identify relevant hazardous substances

You must work out the potential pollution risk of each hazardous substance you have identified in Stage 1. If they could cause soil and groundwater pollution, they are called 'relevant hazardous substances'.

All waste received at the site will be in a solid state.

Hazardous Property	Risk in waste	Possible constituents (to be tested)
HP1 Explosive	None	None
HP2 Oxidising	None	None
HP3 Flammable	Negligible	None
HP4 Irritant	Low	Metals
HP5 Specific Target Organ Toxicity (STOT)	Low	Asbestos testing must part of pre-acceptance classification
HP6 Acute Toxicity	None	None
HP7 Carcinogenic	Medium	TPH, PAH, Metals
HP8 Corrosive	Low	pH
HP9 Infectious	None	None
HP10 Toxic for reproduction	Very Low	None
HP11 Mutagenic	Medium	TPH, PAH
HP12 Produces toxic gases	None	None
HP13 Sensitising	None	None
HP14 Ecotoxic	Medium	Heavy metals suite, TPH

### Stage 3 – Assessment of site specific pollution possibility

You must assess the potential pollution risk to soil and groundwater for each Relevant Hazardous Substance for all activities that will take place on your site. For example, production areas, tank farms, fuel storage and warehousing.

All waste will be received, stored and treated inside a building, with an impermeable surface and sealed drainage.

The impermeable surface and sealed drainage will prevent any risk of confirmation of the soil and groundwater.

The building will prevent rainwater coming into contact with the waste and potentially leaching contaminants from the waste.

The site infrastructure will be checked daily.

Only staff trained in the operational procedures will be permitted to access the hazardous waste treatment area. This will prevent any risks associated with cross-contamination or accidental release of hazardous waste.