

SITE CONDITION REPORT

POTLL 5.0

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.

Site Condition Report

41/43 Berth - RDF Environment Permit Application

Introduction

With the withdrawal of the EA Regulatory Position Statement (RPS) on the Storage of RDF (including SRF), the Port of Tilbury is required to apply for a bespoke environmental permit. As part of this process Port Engineering has been asked to undertake a site condition report of the proposed licensed site at 41/43 Berth

Condition of the Site

The surface at this site comprises of a hard standing made up of non-porous concrete/asphalt. As would be expected in an operational port, the quality of these surfaces varies, with some areas in good condition and other areas with cracking evident on the surface. Drainage on site is to the dock, whether through surface overflow or positive drainage networks.

Condition and Suitability of the Site


The site is currently used for the storage of containers.

Regarding surface water drainage, given the controls for the commodity¹, it is considered (qualitatively) that the drainage is appropriate for the commodity, particularly given the dilution factor in the dock (given the volume of water behind the lock entrance is circa 6,500,000 m³, along with a regular turnover of water caused by ship movements and the addition of river water through the impounding pumps).

Conclusion

Given the above, in consultation with the Group Sustainability, Safety & Regulatory Manager and the Senior Claims & SHE Advisor, I understand that the site condition is appropriate for the commodity.

Name Ian Wright
Position Civil engineering Manager



¹ Controls listed as bales of RDF/SRF being appropriately compacted, sprayed with insecticide to deter pests/vermin, any bale damage being immediately repaired or returned to supplier and/or quarantined under cover, along with regular inspection of the cargo and the presence of spill kits and appropriate staff with spill response training.

1.0 SITE DETAILS	
Name of the applicant	Port of Tilbury London Limited
Activity address	UK Paper Hub 47Berth
National grid reference	TQ 6257 7629
Document reference and dates for Site Condition Report at permit application and surrender	POTLL 5.0
Document references for site plans (including location and boundaries)	POTLL 2.1 / POTLL 2.3 / POTLL 2.5 / POTLL 2.6 / POTLL 2.10 / POTLL 2.11

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	
Environmental setting including: <ul style="list-style-type: none"> • geology • hydrogeology • surface waters 	<p>The underlying structural and soil geology is;</p> <ul style="list-style-type: none"> - Structural Quay 1m thick founding on (in order); - Made Ground comprising various granular fill 2.0m - 14m of alluvium comprising clays and peat lenses - 5m of sand/gravel founding on - Chalk to significant depth <p>There are no borehole extraction licences within the Port estate.</p> <p>Surface water is controlled via where required a positive drainage system with pollution separators. Where the material is stored the surface water run-off is to the impounded dock. The impounded dock discharges through the lock into the River Thames. The sediment sample database held by the Port of London Authority (PLA) has shown that there are instances of all determinants shown in Table 2, with concentrations in excess of CEFAS Action Levels occurring within the tidal river Thames. With a long industrial history that</p>

	the tidal river Thames has, this is not unexpected. With improved management in more recent years, cleaner sediment is often observed at the surface sediments.
<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>There are no noted pollution events that have affects the permit areas.</p> <p>The New Dock Extension where these permit areas are situated are purpose build berths and quays from circa late 1960's and have been used for either conventional storage (such as imported timber/paper) of later from the 1990's as an intermodal container terminal.</p>
Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	The New Dock Extension was constructed through a marsh with no recorded contamination. There has been numerous+ pre works exploratory boreholes around the New Dock Extension.
Baseline soil and groundwater reference data	+these are extensive and have not brought up any historic or present ground condition concerns.
Supporting information	<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

3.0 Permitted activities	
Permitted activities	Handling and Storage on cassettes prior to export - Refuse Derived Fuel (RDF) EWC 19 12 10 / 19 12 12 & Recycled cardboard or similar (RCF) EWC 15 01 01 / 20 01 01
Non-permitted activities undertaken	None
<p>Document references for:</p> <ul style="list-style-type: none"> • plan showing activity layout; and • environmental risk assessment. 	<p>Plans –POTLL 2.1 / POTLL 2.2 / POTLL 2.3 / POTLL 2.6 /POTLL 2.7 / POTLL 2.8 / POTLL 2.9 / POTLL 2.10 / POTLL 2.11/ POTLL 2.12</p> <p>Environmental Risk Assessment POTLL 4.2</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.

4.0 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	<ul style="list-style-type: none"> • 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)

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"> • Inspection records and summary of findings of inspections for all pollution prevention measures • Records of maintenance, repair and replacement of pollution prevention measures

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 of supporting information	<ul style="list-style-type: none"> • 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 of supporting information	<ul style="list-style-type: none">• Description of soil gas and/or water monitoring undertaken• Monitoring results (including graphs)
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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">• Site closure plan• List of potential sources of pollution risk• Investigation and remediation reports (where relevant)
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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">• 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)
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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.