SITE CONDITION REPORT FOR PERMIT VARIATION

Report for: Stolthaven Dagenham Limited

Date: 29/05/2025

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Stolthaven Dagenham Ltd

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CONTENTS

1. INTRODUCTION

Ricardo was commissioned by Stolthaven Dagenham Ltd (SDL) to support a bespoke permit variation application for its permitted facility in Dagenham, hereafter referred to as "the facility". Under the Environmental Permitting (England and Wales) Regulations 2016, the facility already has the benefit of a bespoke environmental permit referenced EPR/WE4467AC issued on 22 October 2024.

This document has been prepared in partnership with SDL to review and update the previous Site Condition Report (SCR). To support this permit variation application for the permit EPR/WE4467AC, an updated baseline SCR is required in accordance with Article 22(2) of IED (Site Closure), which 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."

There have been no changes to the site condition since the previous application and existing permit and there will be no changes to the permitted area as a result of this variation. For the benefit of clarification this report is has been updated to confirm this.

This SCR has been prepared in accordance with the Environment Agency's H5 Guidance[1] on preparing an SCR, using the template provided in the H5 guidance document to satisfy the requirement for a baseline report under the IED. In accordance with the H5 Guidance and Article 22(2), the objective of the 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.

The relevant sections of the Environment Agency's SCR template (1 – 3) have been completed in the preparation of this document (see section 2), which comprises the following:

- Site details.
- Condition of the land at permit issue:
  - Geology.
  - Hydrogeology.
  - Hydrology.
- Pollution History.
- Evidence of historic contamination.
- Permitted activities.

Section 4 to 7 of the SCR template will be maintained during the life of the permit and Sections 8 to 10 will be completed and submitted in support of the application to surrender the permit.

All waste will be stored and treated on areas with impermeable concrete surfacing and sealed drainage to eliminate any direct pathways to soil and groundwater. Minor spillages, if they occur, will be dealt with immediately by trained staff using appropriate spill response procedure and spill kits located around the site. The possibility of any significant releases to land or groundwater occurring during the lifetime of the permit is therefore limited and it is considered that the additional activities and substances proposed in sections 2.4 pose a low risk to land and groundwater.

The facility will operate with due regard to the conditions of the environmental permit EPR/WE4467AC 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.

Due to the previous land uses at the site, it is considered that there is likely to be existing/historical contamination from the same substances that may pose a limited pollution risk in this case. This is described in Section 2.

[1] Environmental permitting: H5 Site condition report - GOV.UK (www.gov.uk)

2. SITE CONDITION REPORT H5 TEMPLATE

2.1 SITE DETAILS

1.0 Site Details	
Name of the applicant	Stolthaven Dagenham Limited
Activity address	Stolthaven Dagenham, Choats Road, Barking, Dagenham, RM9 6PU
National grid reference	TQ 48822 81930

Document reference and dates for Site Condition Report at permit application and surrender	Permit EPR/WE4467AC Appendix A ED18482_Stolt_Dagenham_Site_Condition_Report

Document references for site plans (including location and boundaries)	See Operating Techniques Appendix B Waste tank storage plan

2.2 CONDITION OF THE LAND AT PERMIT ISSUE

2.0 Condition of the land at permit issue	
Environmental setting including: • geology • hydrogeology • surface waters	**Geology** The British Geological Survey Geology Viewer[2] indicates that the site is situated on a bedrock geology of Thanet Formation – Sand. This is sedimentary bedrock which was formed between 59.2 and 56 million years ago during the Palaeogene period. The Thanet Formation occurs in the central and eastern London Basin, as far north as southern Suffolk, where it passes laterally into the Ormesby Clay Member. To the west of London, it is overstepped by the Upnor Formation. The British Geological Survey Geology Viewer also indicates that the site is on a superficial deposit of Alluvium – clay, silt, sand and peat. This is a sedimentary superficial deposit formed between 11.8 thousand years and the present during the Quaternary period. Alluvium is a general term for clay, silt, sand and gravel. It is the unconsolidated detrital material deposited by a river, stream or other body of running water as a sorted or semi-sorted sediment in the bed of the stream or on its floodplain or delta. **Hydrogeology** The site is located on a Secondary aquifer A (River Terrace Gravels and Thanet Sand Formation) overlying the Principal Chalk Aquifer. Thanet

[2] BGS Geology Viewer - British Geological Survey

	formation is typically composed of homogeneous, bioturbated, glauconitic silty fine-grained sand, with sandy silt. **Hydrology** The site is not located on a ground water protection zone (GPZ). **Flooding** The Government's flood map for planning[3] indicates that the site is within Flood Zone 3 which is classified as land with a high probability of flooding from rivers and the sea due to the proximity of the River Thames. No protection is offered by the Thames flood barrier as the facility is downstream of it. A flood risk assessment was undertaken in 2013. A copy of this has been highlighted in Appendix B of the Environmental Risk Assessment.
Pollution history including: • 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	**Pollution History** There are no records or visible/olfactory evidence of any onsite pollution incidents or existing contamination on the site. **Historical Land-uses** The site is within a wider industrial district in the London Borough of Barking and Dagenham, situated adjacent to the River Thames and to the south of Dagenham. Historical records indicate that the site was undeveloped land from pre-1870 with the site located on a marsh land which was liable to flooding. By 1916 a jetty had been constructed and a railway line had been built and stretched across the northern area of the site. By 1940, two warehouse buildings had been built towards the north-east of the site with the site continuing to expand over the following years. By 1972, the site was approximately similar to that of the present day. The surrounding areas of the site have a deep industrial history, including the bulk storage of liquids and gas and an oil depot.
Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	A Phase 1 Environmental Assessment report was undertaken by WSP in 2007 for the site (see Appendix A). The report concluded that there is likely to be widespread contamination at a site of this nature, which has an industrial history and has been operating for approximately 100 years. The report outlines that in the absence of further information, it is not possible to discount the possibility that there is significant impact to the underlying soil and groundwater at the site. Groundwater monitoring has been undertaken at the site with the latest report (Annual Groundwater Monitoring Interpretative Report, (AECOM, January 2021)) concluding that contaminants were found in monitoring locations (see Appendix D), these contaminants relate to previous industrial activities taken place on the site.
Baseline soil and groundwater reference data	Phase I Environmental Assessment, TDG, Choats Road, Dagenham, Essex, UK, (WSP, August 2007)

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

	Annual Groundwater Monitoring Interpretative Report, Stolthaven Dagenham Ltd, Project Number: 60546332, (AECOM, January 2021).
Supporting information	n/a

2.3 PERMITTED ACTIVITIES

3.0 Permitted activities	
Permitted activities	Existing permit referenced EPR/WE4467AC issued on 22 October 2024. Application for a bespoke waste permit variation application for the following additions and changes: •The mixing and blending of liquid wastes that have the same characteristics. •The addition of 6 non-hazardous liquid wastes. •The increase in the number of storage tanks used, see Appendix B. •The increase in the quantity of waste allowed on site at any one time to 115,000 tonnes. •The increase of the annual quantity of waste accepted at the facility to 500,000 tonnes.
Non-permitted activities undertaken	Storage of fuels and chemicals under the Control of Major Accident Hazards (COMAH) regulations.
Document references for: • Plan showing activity layout; and • Environmental risk assessment.	Please see attached: • Permit EPR/WE4467AC Appendix A • Stolt waste tank storage plan Appendix B • ED18482 Stolthaven Dagenham Environmental Risk Assessment

2.4 CHANGES TO THE ACTIVITY

4.0 Changes to the activity	
Have there been any changes to the activity boundary?	No
Have there been any changes to the permitted activities?	Yes. • The addition of activity of mixing and blending of wastes. • The addition of 6 non-hazardous wastes: - 02 01 03 - Plant-tissue waste - 02 03 01 - Sludges from washing, cleaning, peeling, centrifuging and separation - 02 03 03 - Wastes from solvent extraction - 02 03 05 - Sludges from on-site effluent treatment - 07 01 99 - wastes not otherwise specified (corn oil and glycerin from biodiesel) - 07 06 99 - wastes not otherwise specified (mixtures of vegetable oils, fats and soaps)

	• The increase in the number of storage tanks used for storing wastes. • The increase in the quantity of waste allowed on site at any one time to 115,000 tonnes. • The increase of the annual quantity of waste accepted at the facility to 500,000 tonnes.
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	No, all waste accepted and stored is non-hazardous only.
Checklist of supporting information	Operating Techniques document (section 4.5) mixing and blending waste process. Operating Techniques table 4.1 (list of waste codes and descriptions) Stolt waste tank storage plan Appendix B

2.5 MEASURE TAKEN TO PROTECT THE LAND

5.0 Measures taken to protect the land	
Checklist of supporting information	There is no change to the existing infrastructure and measures to protect the land. All waste storage tanks are sealed and engineered in accordance with the facilities existing three-stage (primary, secondary and tertiary) containment and drainage system. Operating Techniques – Section 4.10 site containment and drainage systems.

2.6 POLLUTION INCIDENTS THAT MAY HAVE HAD AN IMPACT ON LAND, AND THEIR REMEDIATION

6.0 Pollution incidents that may have had an impact on land, and their remediation	
Checklist of supporting information	Since the issuing of the permit referenced EPR/WE4467AC in October 2024, the installation has not had any pollution incidents that may have impacted on the land. A Phase 1 Environmental Assessment report was undertaken by WSP in 2007 for the site (see section 2.2). The report concluded that there is likely to be widespread contamination at a site of this nature, which has an industrial history and has been operating for approximately 100 years.

2.7 SOIL GAS AND WATER QUALITY MONITORING (WHERE UNDERTAKEN)

7.0 Soil gas and water quality monitoring (where undertaken)	
Checklist of supporting information	There has been no soil, gas or water quality monitoring as part of the operation of the existing permitted activities.

3. APPENDICES

Appendix A – Permit EPR/WE4467AC

Appendix B – Stolt waste tank storage plan

Appendix C - Phase I Environmental Assessment (WSP, August 2007) - Attached as a separate document.

Appendix D - Annual Groundwater Monitoring Interpretative Report (AECOM, January 2021 - Attached as a separate document.

Appendix A – Permit EPR/WE4467AC

Appendix B – Waste Tank storage plan

Appendix C - Phase I Environmental Assessment (WSP, August 2007) - Attached as a separate document.

Appendix D - Annual Groundwater Monitoring Interpretative Report (AECOM, January 2021 - Attached as a separate document.

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