Agilent Environmental Permit Application – Redacted for the Public Register

Site Condition and Baseline Report

Agilent Technologies LDA UK Limited

Essex Road, Church Stretton, Shropshire, SY6 6AX

Prepared by:

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SLR Project No.: 410.064951.00001

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Basis of Report

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Table of Contents

Tables in Text

Appendices

1.0 Introduction

SLR Consulting Limited (SLR) has been instructed by Agilent Technologies LDA UK Limited (Agilent) to prepare an application for an Environmental Permit (EP) for their organic polymer manufacturing site located at Essex Road, Church Stretton, Shropshire, SY6 6AX (the site).

The site manufactures silica and organic polymers for use in laboratory consumables and industrial applications at a rate of less than 5 tonnes per year. This is a listed activity as per the Environmental Permitting (England and Wales) Regulations (EPR) 2016 (as amended):

- *Section 4.1 Part A(1)(a)(viii) producing organic chemicals such as plastic materials (for example polymers, synthetic fibres and cellulose based fibres).*

1.1 Context and Objectives of the Site Condition Report

This Site Condition Report (SCR) aims to record and describe the condition of the land prior to the commencement of any operations within the proposed EP installation boundary. It has been prepared in accordance with the Environment Agency's (EA) Site Condition Report H5 guidance with regards to the requirements of a baseline report to meet the requirements of Article 22 (2) of Industrial Emissions Directive (IED).

This SCR will provide a point of reference and baseline environmental data so that when the EP is surrendered it can be demonstrated that there has been no deterioration in the condition of the land as a result of the Installation operations and ensure that the condition of the land is in a 'satisfactory state'.

The location of the site is illustrated in Drawing 001. The site layout; site boundary and proposed EP boundary and emission points are presented on Drawing 002.

Sections 1 to 3 of the EA's SCR template[1] (have been completed within this document and comprise the following aspects:

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

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

1.1.1 Sources

The following sources have been utilised in the preparation of this SCR:

[1] EA Environmental Permitting Site Condition Report Guidance https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report accessed January 2024.

- Multi Agency Geographical Information for the Countryside[2] (MAGIC) map.
- Landmark Envirocheck Report (reference 309861021_1_1 dated 13 April 2023).
- British Geological Survey[3].
- EA. Flood map for planning[4]
- ECHA: European Chemicals Agency Substance Information[5].
- Water Framework Directive Environmental Agency Confirmed Hazardous Substances List[6].

1.1.2 Site Details

Applicant	Agilent
Address	Essex Road, Church Stretton, Shropshire, SY6 6AX
National Grid Reference	SO 45672 93772
Site Area	Approximately 7,500m^2
Document Ref for Site Condition Report	Site Condition Report – 410.064951.00001_SCR dated March 2023.
Figure References	• Drawing 001 - Site Location. • Drawing 002 - Site Layout, EP boundary and Emission Points. • Drawing 003 - Site Setting Plan – Local Receptors. • Drawing 004 - Site Setting Plan – Cultural and Natural Heritage. • Drawing 005 – Chemical Storage Location Plan

1.1.3 Site Location

The site is located in Church Stretton, Shropshire. The site is accessed via Essex Road and the National Grid Reference (NGR) for the site is centred on SO 45672 93772.

The site is located approximately 300m north of Church Stretton town centre and 17.5 km south of Shrewsbury, and is situated within a mix of commercial, recreational and residential property. The A49 runs in a north-south direction approximately 115m east of the site. Residential properties are in close proximity, with the closest located approximately 20m to the north, 20m southeast and 35m to the west of the site respectively.

A culverted stream, Town Brook passes directly beneath the site in an easterly direction from Essex Road, beneath the central carpark and below Unit 2. A soakaway is also located in the southern car park which receives uncontaminated rainwater.

A site location map is provided in Drawing 001.

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[2] Multi-Agency Geographical Information for the Countryside Map, available at www.magic.defra.gov.uk, accessed in April 2023.

[3] British Geological Survey, available at http://www.bgs.ac.uk, accessed April 2023.

[4] Flood map for planning, available at https://flood-map-for-planning.service.gov.uk/, accessed April 2023

[5] ECHA: European Chemicals Agency Substance Information. Accessed at: Homepage - ECHA (europa.eu). Accessed in October 2023.

6 Water Framework Directive Environmental Agency Confirmed Hazardous Substances List. Accessed at '2018 01 31 Confirmed hazardous substances list_0.pdf (wfduk.org)'.

1.1.4 Current on-Site Land Use

Infrastructure at the facility comprises:

- Unit 1: reception, office space and production in the form of packing of powder columns;
- Unit 2: research and development laboratory;
- Unit 3: large-scale and small-scale production;
- Unit 4: chemical storage;
- Unit 5: office space (excluded from the proposed EP boundary);
- Wet chemical scrubber[7];
- Covered drum store;
- Chemical stores;
- Sub-station;
- 10,000L underground interception tank; and
- Car parking in the south and central areas of site.

Topography at the site falls gently from north to south.

1.1.5 Current Surrounding Land Use.

A summary of the site's immediate surrounding land uses is provided in Table 1 below:

Table 1-1 Surrounding Land Uses

Direction	Description
North	Directly north of the site comprises residential properties, with the closest property located approximately 20m north on Windsor Place. Ash Brook is located approximately 90m north. Church Stretton Cricket Club and Churchill Park are located approximately 140m to the north-west and Coppice Leasowes Nature Reserve is located approximately 120m to the north-east.
South	Sandford Avenue (B4371) is located directly adjacent to the southern site boundary. A former railway station building has been converted into a residential property which is located approximately 20m southeast of the site. Commercial/industrial premises are located a further 75m south. Church Stretton railway station and an unnamed surface water feature are located 120m and 165m south of the site respectively.
East	A railway line is located directly adjacent to the eastern site boundary. A bowling green, tennis courts and a play area are located beyond the railway line. Residential properties are also located approximately 200m east.
West	Essex road and residential properties bound the site to the west, with the closest dwelling located 35m west. Church Stretton town

[7] Air emissions abatement at the site is currently under review. Agilent will forward details on any proposed changes under a separate cover.

Direction	Description
	centre and a playing field are located 300m and 340m west respectively.

1.1.6 Sensitive Land Uses

There are no designated ecological habitats on the area of the site. The closest designated ecological habitats to the site are as follows:

- Coppice Leasowes, Church Stretton Local Nature Reserve (LNR), approximately 115m north of the site;
- Rectory Wood and Field LNR, approximately 390m west of the site; and
- Long Mynd Site of Special Scientific Interest (SSSI), approximately 700m west of the site.

2.0 Condition of the Land at Permit Issue

2.1 Environmental Setting

2.1.1 Geology

A review of the British Geological Survey (BGS) map[8] reveals that the site is underlain by the following:

Superficial deposits

- 80% of the site (east): Alluvium consisting of clay, silt, sand and gravel.
- 20% of the site (west): Alluvial Fan Deposits consisting of clay, silt, sand and gravel.

Bedrock geology

Coalbrookdale Formation comprising of mudstone. The sedimentary bedrock formed between 433.4 and 427.4 million years ago during the Silurian period.

2.1.2 Hydrogeology

Aquifer Classifications

Multi Agency Geographical Information for the Countryside (MAGIC)[9] Map identifies the bedrock as a Secondary B aquifer, which is defined as:

"predominantly lower permeability strata which may in part have the ability to store and yield limited amounts of groundwater by virtue of localised features such as fissures, thin permeable horizons and weathering."

The superficial drift aquifer is defined as a Secondary A aquifer defined as permeable, unconsolidated (loose) deposits.

Groundwater

No specific depth to groundwater for the site is available.

[8] British Geological Survey map, available at www.bgs.ac.uk, accessed in April 2019

[9] Multi Agency Geographical Information for the Countryside Map (MAGIC), available at https://magic.defra.gov.uk/MagicMap.aspx, accessed in April 2023

The Polymer Laboratories Ltd 2000 report[10] states that:

The water table is 'quite high'.

Review of nearby publicly available BGS borehole data revealed groundwater encountered at approximately 2m below ground level in borehole SO/49SE/10 located approximately 140m northwest, drilled in 1961.

Groundwater Abstractions

A water well is located approximately 125m to the east.

The site is not located within a groundwater source protection zone, although the total catchment of a groundwater source protection zone (SPZ3) is located approximately 125m to the west. A source protection zone (SPZ1) is located 625m north associated with a water bottling plant.

2.1.3 Hydrology

Surface Water Features

A culverted stream, Town Brook passes directly beneath the site in an easterly direction from Essex Road, beneath the central car park and below Unit 2. The culverted section of Town Brook ends approximately 250m northeast of the site.

Refer to Appendix A for the location of the culvert. The depth of the culvert is not known.

Four streams have been identified south of the site, the closest being approximately 165m away.

Ash brook is located approximately 90m north of the site's EP boundary. An unnamed stream is also located approximately 100m east.

Surface Water Abstractions

No surface water abstractions identified within 500m.

2.1.4 Flood Risk

The Flood Map for Planning[11] reveals that the site lies within Flood Zone 3: designated as high probability of flooding from rivers and the sea.

The Long Term Flood Risk Assessment[12] indicates that the site is at 'medium risk' of flooding from surface water. Medium risk means that this area has a chance of flooding of between 1% and 3.3% each year. Flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding.

Agilent are aware that offsite surface water flooding along Essex Road has previously impacted the site. When this occurs, the site access road floods and water collects in the 10,000 L interceptor tank, where it is over pumped to discharge point S1 for release.

Agilent state that flooding only occurs along the access road that joins Essex Road and in the central car parking area away from raw material, waste and chemical storage.

[10] Polymer Laboratories Ltd (2000). Report into the 'Clean Up' of Subsoil on the New Construction Site (dated November 2000) reference CV/CS/ESS JN/ 8577).

[11] Flood Map for Planning, available at https://flood-map-for-planning.service.gov.uk/, accessed in June 2022.

12 Long Term Flood Risk Assessment – Available at Check the long term flood risk for an area in England – GOV.UK (www.gov.uk), accessed April 2023

Agilent are in discussions with the 'Drainage and Flood Risk Manager' at Shropshire County Council and also Severn Trent to try and resolve this issue. Preliminary work by Severn Trent along Essex Road has lessened the impact of the surface water flooding. Agilent report all flood events to both parties. It is understood by Agilent that Severn Trent intend to undertake further remedial work to manage the offsite surface water flooding issue.

Due to the risk of flooding, the site operates under an Emergency Flood Plan procedure (reference FM-09 V3.3 dated 18 September 2022). The procedure on how to manage the localised surface water flooding from Essex Road is listed under 'Flash Flooding' in the plan.

2.2 Pollution History

2.2.1 Pollution Incidents

Table 2-1 below summarises information taken from the Envirocheck Report (410.064951.00001_ERA) for statutory pollution history information within 1000m to the site.

Table 2-1 Pollution Incidents Nearby

Statutory Information	Approximate Distance from Site	Description
Pollution Incident to Controlled Waters	58m west	Incident Reference 2501535, in February 1997, petrol caused a category 3 minor incident to water within the Severn Catchment: Teme.
	77m south	Incident Reference 2501131, in December 1996, diesel caused a category 3 minor incident to water within the Severn Catchment: Teme.
	83m west	Incident Reference 2501310, in November 1996, a miscellaneous pollutant (unknown) caused a category 3 minor incident to water within the Severn Catchment: Teme.
	99m south	Incident Reference 2001102, in August 1996, storm sewage caused a category 3 minor incident to water within the Severn Catchment: Teme.
	174m south	Incident Reference 2502375, in September 1997, waste oil caused a category 3 minor incident to water within the Severn Catchment: Upper Mid Severn (Montford – Bewdley).

2.2.2 Potentially Polluting Activities – Offsite

Table 2-2 below summarises information taken from the Envirocheck Report (410.064951.00001_ERA) for potentially polluting activities undertaken in the vicinity of the site.

Table 2-2 Potentially Polluting Land Uses Offsite

Statutory Information	Approximate Distance from Site	Description
Active Discharge Consents	259m southwest from site	In February 1990 at English Estates (Church Stretton, Shropshire) a discharge consent for trade discharges (cooling water) was revoked
	596m east of the site	In August 2009 at a domestic property (including farmhouse) a new discharge consent was issued under the Water Resources Act, Section 88 & Schedule 10 as amended by Environment Act 1995 and referred to sewage discharges (final/treated effluent).
Local Authority Pollution Prevention Control	65m south	JI Mackenzie & Cs Pratt, relating to PG1 /1 Waste oil burners, less than 0.4MW net rated thermal input. The status of the measure is 'revoked'
	104m south	Longmynd Service Station related to PG1/14 Petrol filling station dated March 1999. The status of this measure is permitted.

2.2.3 Historical Land-Uses and Associated Contaminants

2.2.3.1 Historical On-Site Land Use

A review of historical maps (Envirocheck Report reference 309861021_1_1 dated 13 April 2023) has been undertaken to prepare the onsite land use history.

- From 1883 to at least 1954 the site comprised a railway siding traversing the site from north to south and also a goods shed.
- In approximately 1974 the site featured a coal yard, with the addition of a factory between the approximate years of 1977 to 1986.
- Unit 2 was constructed circa 1974.
- Small scale polymerisation including research and development began at the site in the early 1980's. In the early 1980s the northern portion of the site was purchased from a haulage company.
- Unit 3 was constructed in 2000 / 2001. 1000 tonnes of soil was removed from beneath this unit at this time and replaced with 'clean aggregate' (refer Previous Ground Investigation Reports below).
- Unit 4 was constructed in circa 2015.
- Between 2016 and 2023 the site remained unchanged.

2.2.3.2 Historical Off-Site Land Use

A review of historical maps (Envirocheck Report reference 309861021_1_1 dated 13 April 2023) has been undertaken to prepare the offsite land use history.

- From approximately 1883 to 1927, land surrounding the site predominantly comprised open fields. A railway station was located approximately 20m southeast of

the site and the Western Joint railway approximately 20m east. A battlefield was identified approximately 200m east and a quarry approximately 400m west.

- The surrounding area remained as predominantly open fields from approximately 1927 to 1954 with the following features identified:
    - Residential properties along Essex Road (closest distance to site - 35m) built by 1937.
    - Recreational grounds (e.g. tennis courts) located approximately 50m east of the site.
    - Additional road links (e.g. Essex Road adjacent to site which joined up with B4371 Sandford Avenue and A49 Crossways).
    - Additional residential properties, approximately 200m southeast of the site.
- Between approximately 1955 and 2000 the surrounding area became urbanised, with a significant increase in residential properties and recreational facilities to the east (approximately 250m) and north of the site boundary (approximately 250m).
- The 1974 map also saw the introduction of Church Stretton railway station approximately 120m south.
- Windsor Place, a set of flats was present adjacent to the north of the site from approximately 1997 to at least 2006. The flats had been replaced by residential housing on the new 'Windsor Place' road by 2022, with the closest residential property to the site being located approximately 20m north of the site.
- From approximately 2006 to 2023 the surrounding area remained unchanged.

2.2.4 Any Visual / Olfactory Evidence of Existing Contamination

There is no current evidence of visual or olfactory contamination at the site. Refer to Section 2.3 for a summary of historical contamination identified during construction works.

2.2.5 Evidence of Damage to Pollution Prevention Measures

The January 2023 Adler & Allan Initial Bund Inspection Report (reference CW/AGI/BUND/050123 dated 05 January 2023) confirmed that the drum store bund required some repair. Agilent subsequently undertook repairs to the following:

- Cracking to the bund floor radiating from the entrance ramp.
- Damage and chipping of concrete bund walls.
- Concrete 'honeycombing' on external bund walls.
- Heavy cement weathering on floor surface.
- Re-seal of concrete core area to C736 standards.

Resin injection methodologies (Fosroc Nitofill LV resin) were used in June 2023 to seal the cracks to the bund floor and to seal the reinstatement around a previous core sample hole.

SLR Consulting visited site to assess the repairs on 02 August 2023. SLR concluded in a letter (Agilent Chemical Storage Bund Crack Repair Inspection, reference 403_065044_00001 dated 04 August 2023) that overall, works had been performed to a reasonable standard and SLR is content that the bund repairs are C736 compliant.

Additionally, chemicals and waste in the drum store are stored on bunded stillages with 110% capacity and the drum store concrete bund is actually used as tertiary, rather than secondary containment. The drum store has a capacity of 12.5m^3.

2.3 Evidence of Historic Contamination

Unit 2, Unit 3 and the drum store were constructed between 1999 and 2001. During construction works, contaminated land was identified in the soil. The soil investigation and subsequent remediation are summarised in the following documentation (presented in Appendix B):

- South Shropshire District Council: Remediation at Polymer Laboratories - New Site (19 June 2001).
- Remediation Statement on Polymer Laboratories Ltd, Essex Road site (23rd May 2001).
- Report into 'Clean Up' of Subsoil on New Construction Site (November 2000).

Prior to the construction work, in 1998 the northern area of site comprised an old stone building previously owned by British Rail and 'waste land'. Four trial pits were completed in 1999 which did not identify any contaminated land.

Construction began in August 1999. During a routine inspection by South Shropshire County Council a black layer of subsoil was observed.

Laboratory testing of the black soil identified hydrocarbon compounds elevated above the assessment threshold for industrial use.

The black soil was considered to be granite aggregate that was potentially contaminated with biodegraded oils and greases mixed with coal dust. This aggregate is associated with the period of time that the area was used as a rail offloading yard for a gas works.

The black soil layer was removed in the area where Unit 3 and the drum store are located and back filled with 'clean' aggregate. Approximately 1000 tonnes of soil was removed and disposed of to a suitably licenced facility.

Validation testing was completed on the soil beneath the black layer of soil. The results of these tests *'showed that soil under the black layer had no, or very little contamination by hydrocarbons'*.

The black soil layer did not shown signs of leaching where it was tested. As such, it was not considered necessary to remove it from beneath onsite car parks, peripheral areas and roadways.

The black soil layer was not identified in the area beneath the substation or generator house.

On 19 June 2001 South Shropshire District Council stated that they were satisfied that '*the site had been remediated to a standard suitable for the new use of the site'*.

2.4 Baseline Soil and Groundwater Reference Data

The EA H5 SCR guidance (April 2013) states that:

'3.2 For existing IPPC installations that become IED installations'

'These are installations carrying out any of the activities listed in Part 2 of Schedule 1 to the EPR 2010 that were already operating, or had submitted a permit application, before 7 January 2013,

> *If your activity involves the use, production or release of relevant hazardous substances you must submit baseline data within an SCR, before we update your permit. We recommend that you carry out monitoring of groundwater and soil and submit these results in your report. Alternatively you could use good quality existing data, if it is available. This will quantify the levels of pollutants present which you will compare to the levels you find when you cease carrying out the activity and wish to surrender your*

permit. However, if you choose not to submit any monitoring data you should provide a justification for not doing so in your report. In this case you will be accepting the risk that you may be required to clean up pre-existing contamination when you surrender your permit.'

Set out below in Table 2-3 are details of how Agilent has met the baseline data requirements.

Table 2-3 Industrial Emissions Directive Baseline Data Requirements

Stage	Activity	Objective	How The Requirements Have Been Met
1	Identify which hazardous substances are used, produced or released at the installation.	Determine whether or not hazardous substances are used, produced or released in view of deciding whether a baseline report is required. If yes: produce a list of all potential hazardous substances.	A list of potentially hazardous substances used, produced or released at the Installation is listed below. **As a result of the operation of the existing polymer production facility :** • Volatile Organic Compounds (VOCs). • Total petroleum hydrocarbons (TPH) • Semi Volatile Organic Compounds (SVOCs). • Acids / alkalis. • Poly and perfluoro alkyl (PFAS) from foam extinguishers, if used for fire control. PFAS extinguishers are being phased out on site. **As a result of historical land use:** Potential hazardous substances from the railway sidings: • TPH. • Polycyclic aromatic hydrocarbons (PAH). • Metals. General Made Ground present at the site means the presence of the following cannot be discounted: • Metals. • TPH. • Gases (including CO_2, H_2S, CH_4, CO) • Asbestos • Acidic/alkaline soil. Historical polymer production: • VOCs. • SVOCs.

Stage	Activity	Objective	How The Requirements Have Been Met
			• Acids / alkalis.
2	Identify which of the hazardous substances from Stage 1 which, according to the evaluation by suitably qualified and experiences persons, as a result of their hazardousness in respect to toxicity, mobility, persistence and biodegradability (as well as other characteristics), are capable of contaminating soil or groundwater. Discard those hazardous substances that are incapable of contaminating soil or groundwater. Justify and record the decisions taken to exclude certain hazardous substances.	To restrict further consideration to only the **relevant** hazardous substances (RHS) that are capable of contaminating soil or groundwater in view of deciding on the need to prepare and submit a baseline report.	A review of the raw materials present at the site that are considered to be an RHS substance are presented in Appendix C, Table C-2. The following RHS stored in quantities above 220 litres have been identified in the current production process: *Back Up Generator* • Diesel *Drum Store* • Tetrahydrofuran • Dichloromethane • Petroleum ether • Dimethylformamide • Dimethylacetamide • Diluted waste solvent All of the substances detailed above would be capable of contaminating soil and groundwater if there were no mitigation measures in place at the Installation. However, existing mitigation measures for the site will continue to ensure that no contamination occurs as a result of the existing and proposed activities to be undertaken at the site, refer to the following for a list of mitigation measures utilised onsite: • Appendix D: Management and Mitigation of RHS Storage. • Environmental Risk Assessment – 410.064951.00001_ERA • Best Available Techniques and Operating Techniques – 410.064951.00001_BATOT. The Facility will be managed by technically competent personnel in accordance with site procedures and the

Stage	Activity	Objective	How The Requirements Have Been Met
			Environmental Management System (EMS). This will ensure good practice on site and minimise environmental risk throughout the operation.
3	For each relevant hazardous substance brought forward from Stage 2, identify the actual possibility for soil or groundwater contamination at the site of the installation, including the probability of releases and the consequences of releases, taking particular account of: - the quantities of each hazardous substance concerned; - how and where they are stored; - how they are to be transported around the installation; - how they are used - where they are emitted - measures that have been and, for new installations, will be adopted to protect soil and groundwater at the installation.	To identify which of the hazardous substances from Stage 2 represent a potential pollution risk at the site based on the likelihood of emissions of such substances occurring. **These are the 'relevant' hazardous substances for which information must be included in the baseline report.** Note: Where it is found that, due to the quantities of the hazardous substances used, produced or released, that there is **no possibility of soil and groundwater contamination a baseline report does not need to be prepared or submitted**. However, in those cases it is expected that a record of such a decision, including the reasons for the decision, will be made and held by the competent authority.	As detailed in Stage 2, existing mitigation measures in place will protect the groundwater, surface water and soil within the installation permit boundary from contamination from the existing and proposed site activities. Appendix E presents the 'Land Pollution Risk Assessment' for the site. This assessment outlines potential risks from identified RHS used on site and what controls are used to minimise these risks. This assessment identifies the RHS stored and used at the site and the locations in which they are present. The assessment then assesses the adequacy of the containment and pollution prevention measures used to prevent loss of potential pollutants to the soil and groundwater underlying the site. The assessment identifies those materials / activities where the pollution prevention measures are considered to be suitable and sufficient, and hence where no credible risk of pollution occurring exists. Where applicable, it also identifies those materials / activities where a credible risk of pollution occurring exists, and hence the presence of such pollution risk should be used to inform the scope of any intrusive site investigation required to collate baseline data on the site condition. The Land Pollution Risk Assessment (Appendix E) has concluded that there is no credible risk potential pollution impacting on soil and groundwater as a result of the activities proposed to be regulated under the EP.

Stage	Activity	Objective	How The Requirements Have Been Met
4	Provide site history	Identify potential sources which may have resulted in the relevant hazardous substances identified in Stage 3 being present on the site of the installation.	Please refer to Section 2.2 of this SCR for details of past land use, historic pollution incidents and historical intrusive data
5	Identify the site's environmental setting	Determine where hazardous substances may go if emitted and where to look for them. Also identify the environmental media and receptors that are potentially at risk and where there are other activities in the area which release the same hazardous substances and may cause them to migrate onto the site.	Please refer to Sections 1.2 and 1.3 of this SCR for details of the Site's surroundings and details of present environmental settings. Please refer to the ERA included with this EP application.
6	Use the results of Stages (3) to (5) to describe the site, in particular demonstrating the location, type, extent and quantity of historic pollution and potential future emissions noting the strata and groundwater bodies likely to be affected by those emissions – making links between sources of emissions, the pathways by which pollution may move and the receptors likely to be affected.	Identify the location, nature and extent of existing pollution on the site and to determine which strata and groundwater bodies might be affected by such pollution. Compare with potential future emissions to see if areas are coincident.	The Land Pollution Risk Assessment (Appendix E) indicates that there is no credible risk of potential pollution impacting on soil and groundwater as a result of the activities proposed and management practices in place. However, there are potential historical sources of pollution located at the site: • Operation of the site as a railway siding and coal transfer station. • Potential for Made Ground located below the site. • Polymerisation production site since the 1980s which may have been subject to less strict control of raw materials as undertaken today. • Integrity of tertiary containment at drum store was identified to be comprised prior to remedial works undertaken. The drum store now complies with CIRIA 736. There is no credible risk from pollution from the proposed onsite activities. However, SLR recommend that Agilent undertake baseline soil and groundwater

Stage	Activity	Objective	How The Requirements Have Been Met
			monitoring. Establishing baseline soil and ground conditions at the start of the EP will avoid potentially more stringent clean up criteria being applied by the regulator at site surrender. Also as stated in the H5 Guidance: 'if you choose not to submit any monitoring data…. you will be accepting the risk that you may be required to clean up pre-existing contamination when you surrender your permit.'
7	If there is sufficient information to quantify the state of soil and groundwater pollution by relevant hazardous substances on the basis of Stages (1) to (6) then go directly to Stage 8. If insufficient data exists, then intrusive investigation of the site will be required in order to gather such information.	Collect additional data as is necessary to allow a quantified assessment of soil and groundwater pollution by relevant hazardous substances.	There is no credible risk from ongoing pollution incidents from the proposed onsite activities due to the combination of existing containment and environmental management procedures that are currently in place. However, SLR recommend that Agilent undertake baseline soil and groundwater monitoring as the current data set is insufficient to quantify the current state of soil and groundwater pollution by relevant hazardous substances. Establishing baseline soil and ground conditions at the start of the EP will avoid potentially more stringent clean up criteria being applied by the regulator at site surrender. Also as stated in the H5 Guidance: *'if you choose not to submit any monitoring data…. you will be accepting the risk that you may be required to clean up pre-existing contamination when you surrender your permit.'*

3.0 Permitted Activities

3.1 Existing Activities to be Permitted

The site manufactures organic polymers and resins for use in laboratory consumables (diagnostic products); liquid chromatography instrumentation and in the production of magnetic beads. The process involves the polymerising of monomers. Surface coatings can be added to the organic polymers where required.

On-site processes include receipt and storage of raw materials; manufacture of organic polymers and resins; storage; loading and despatch of finished products. A research and development (R&D) laboratory is also located onsite.

The site sources raw materials including organic solvents, tetrahydrofuran , methanol, acetone, tetrahydrofuran, styrene, divinylbenzene and dichloromethane. Where reactions occur, these take place within temperature-controlled reaction systems and once complete, the product is discharged to a vessel where it is mixed with a solvent, filtered and blended prior to discharge. Products are then transferred to smaller packages as required.

The reaction vessels are heated via electrical heating systems. General heating and other processes are heated via the low temperature hot water system which is powered by several small gas fired boilers (<1MWth rated thermal input).

An emergency diesel generator (>1MWth rated thermal input) is also located onsite which backs up critical electrical supplies.

Reactors and vessels are connected to the wet scrubber to abate volatile organic compound (VOC) emissions to air. Local exhaust ventilation for the fume cupboards (9No. vents) are also present onsite. It is noted that Agilent are currently undertaking a review of air emissions abatement and will provide details of this under a separate cover.

Wastewater generated at the site includes:

- Process cooling and equipment wash-water (laboratory waste water[13], cooling water, compressor condensate, ion exchange[14,] sieving of polymer particles[15] and emptying of laboratory tanks[16]).
- Chlorinated solvent waste containing water (transferred offsite for use as cement kiln fuel).
- Unchlorinated solvent waste containing water (transferred offsite for use as cement kiln fuel).
- Chlorinated and unchlorinated solvent waste containing water is collected twice a week by a waste contractor and reused as cement kiln fuel. Process cooling and equipment wash-water is discharged to sewer under four trade effluent discharge consents with Severn Trent.
- Solid waste at the site comprises glassware from the laboratory (contaminated with low level solvents) and general waste from the laboratory (i.e., gloves, filters and

[13] Laboratory waste water containing small volumes of detergents, residual acetone, polymeric solids and de-ionised water from glassware washing.

[14] Ion exchange from the reverse osmosis process.

[15] Sieving of polymer particles containing predominantly mains water, with a small amount of inert polymeric solids. Sieves and filters are used to removed particulates for discharges to sewer.

[16] Emptying of laboratory tanks comprises reserve osmosis water, deionised water and mains water. This does not contain any R&D chemicals.

personal protective equipment). Solid waste is transferred offsite to a suitably licenced facility for recycling or for use as fuel in an energy from waste plant.

The drum store comprises bunded, undercover storage for raw materials and waste. An 10,000L underground interception tank is located on the surface water drainage system prior to discharge point S1 that connects to a Severn Trent sewer along Essex Road.

3.1.1 Installation Activities

The facility will be permitted under Schedule 1, Part A1 of the Environmental Permitting (England and Wales) Regulations (EPR) 2016 (as amended), as follows:

Schedule 1 Section 4.1 Part A(1)(a)(viii) producing organic chemicals such as plastic materials (for example polymers, synthetic fibres and cellulose based fibres).

3.1.2 Directly Associated Activities

The following directly associated activities (DAAs) to the primary activity are undertaken at the site:

- Storage of raw materials;
- Storage and handling of chemicals, oils, products and residues;
- Storage and off-site removal of waste solvent-based effluent;
- Storage and off-site disposal of solid waste;
- Combustion of natural gas in boilers to provide process heating; and
- Loading and dispatch of final products.

3.2 Non-permitted Activities

There are no non-permitted activities taking place at the site.

3.3 Environmental Monitoring and Compliance

Monitoring of point source and fugitive emissions throughout the lifetime of the site will be undertaken in line with the conditions outlined within the EP.

Reporting of emissions will be undertaken in line with the conditions outlined in the EP.

3.4 Operation of the Installation and Management System

The Facility will be managed by technically competent personnel in accordance with site procedures and the Environmental Management System (EMS). This will ensure good practice on site and minimise environmental risk throughout the operation.

3.5 Environmental Risk Assessment

As required by EA guidance, an ERA has been undertaken and is included as part of the EP application.

The ERA is provided in section 6 of the EP application and is an assessment of the risks to the environment and to human health that may be associated with the proposed operations at the Site. The ERA reviews a 2km radius from the Site's EP boundary for potentially sensitive receptors of ecological importance along with features such as sites of cultural and natural heritage. A radius of 500m from the Site's EP boundary has been adopted for all

other potentially sensitive receptors (for example, residential, commercial, industrial, agricultural, and surface water receptors).

3.6 SCR Updates

Agilent will maintain the SCR over the lifetime of the site to detail potential or recorded change to the condition of the Site.

4.0 Conclusion

There is no credible risk from ongoing pollution incidents from the proposed onsite activities due to the combination of existing containment and environmental management procedures that are currently in place. However, SLR recommend that Agilent undertake baseline soil and groundwater monitoring as the current data set is insufficient to quantify the current state of soil and groundwater pollution by relevant hazardous substances. This is particularly relevant considering the cross-over between historical processes undertaken at the site between the 1980s and the present day, and the proposed activities covered under the environmental permit.

Establishing baseline soil and ground conditions at the start of the EP will avoid potentially more stringent clean up criteria being applied by the regulator at site surrender.

Also as stated in the H5 Guidance:

‘if you choose not to submit any monitoring data…. you will be accepting the risk that you may be required to clean up pre-existing contamination when you surrender your permit.’

Appendix A OS Water Network Map

Agilent Environmental Permit Application – Redacted for the Public Register

Site Condition and Baseline Report

Agilent Technologies LDA UK Limited

SLR Project No.: 410.064951.00001

4 July 2025

Appendix B Previous Land Quality Reports

Agilent Environmental Permit Application – Redacted for the Public Register

Site Condition and Baseline Report

Agilent Technologies LDA UK Limited

SLR Project No.: 410.064951.00001

4 July 2025

Appendix C Raw Materials List and RHS Assessment

Agilent Environmental Permit Application – Redacted for the Public Register

Site Condition and Baseline Report

Agilent Technologies LDA UK Limited

SLR Project No.: 410.064951.00001

4 July 2025

C.1 Current Raw Materials List and RHS Assessment

Table C-1 Raw Materials List and RHS Assessment

Chemical	CAS No	Container Type	Volume of Container (litre)	Secondary Containment	Environmental Risk Phrases	Relevant Hazardous Substance
Back-Up Generator						
Oil, Diesel	918-958-1	Tank	80L	Concrete Bunding	ECHA Database H411 – Aquatic Chronic 2 Carc. 2, H351 – Suspected of causing cancer <state route of exposure if it is conclusively proven that no other routs of exposure cause the hazard.	Yes
Chemical Stores and Cold Stores						
Storage Location CS01						
Redacted						
Storage Location CS02						
Redacted						
Storage Location FR03						
Redacted						
Storage Location FR04						
Redacted						
Storage Location FR06						
Redacted						
Drum Store						
3-Methyl-1-butanol	123-51-3	Drum	200L	Concrete bunded drum store.	ECHA Database No harmonised classification listed. EA Confirmed Hazardous Substance List	No

Chemical	CAS No	Container Type	Volume of Container (litre)	Secondary Containment	Environmental Risk Phrases	Relevant Hazardous Substance
					Not listed	
Acetone	67-64-1	Drum	200L		See entry above	No
Dichloromethane	75-09-2	Drum	200L		See entry above	Yes
Diethylbenzene	25340-17-4	Drum	200L		ECHA Database No harmonised classification listed. EA Confirmed Hazardous Substance List Not listed	No
Dimethylacetamide	127-19-5	Drum	200L		ECHA Database Repr. 1B H360D 'May damage fertility. Suspected of damaging the unborn child.' EA Confirmed Hazardous Substance List Not listed	Yes
Dimethylformamide	68-12-2	Drum	200L		ECHA Database Repr. 1B H360D 'May damage fertility. Suspected of damaging the unborn child.' EA Confirmed Hazardous Substance List Not listed	Yes
Divinylbenzene	1321-74-0	Drum	200L		ECHA Database No harmonised classification listed. EA Confirmed Hazardous Substance List Not listed	No
Ethylenediamine	107-15-3	Drum	25L		ECHA Database No aquatic risk phrases or reproduction risk phrases listed on ECHA database	No

Chemical	CAS No	Container Type	Volume of Container (litre)	Secondary Containment	Environmental Risk Phrases	Relevant Hazardous Substance
					EA Confirmed Hazardous Substance List Not listed	
Methanol	67-56-1	Drum	200L		See entry above	No
Methyl Ethyl Ketone	78-93-3	Drum	200L		ECHA Database No aquatic risk phrases or reproduction risk phrases listed on ECHA database EA Confirmed Hazardous Substance List Not listed	No
Petroleum ether 40/60	64742-82-1	Drum	25L		ECHA Database Muta. 1A, H340 – May cause genetic defects. Carc. 1A, H350 – May cause cancer. EA Confirmed Hazardous Substance List Not listed	Yes
Tetrahydrofuran	109-99-9	Drum	200L		See entry above	Yes
Diethylene Glycol	111-46-6	Drum	200L		ECHA Database No aquatic risk phrases or reproduction risk phrases listed on ECHA database EA Confirmed Hazardous Substance List Not listed	No
Waste solvent	Various	Drum	200L		Assumed to incorporate diluted RHS.	Yes

C.2 Identified RHS and Storage Arrangements

Chemicals that have been identified as a RHS in Table B-1 above have been carried forwarded to Table B-2 below, where they are stored in quantities on site above 220 litres. Table B-2 outlines how RHS chemicals are handled during delivery and offloading.

Table C-2 Summary of Identified RHS Storage

Chemical (RHS)	Offloading Area Location	Overview of Offloading Arrangements	Secondary Containment	Potential Risks
Back Up Generator – Generator House				
Diesel	Fuel will be offloaded from road tankers on the area of impermeable hardstanding (concrete) adjacent to the generator house.	Drip tray at connection point to emergency generator. Managed under offloading procedures. Offloading to be supervised by trained Agilent personnel. Spill kits to be provided.	Tanker offloading will be situated on impermeable hardstanding. Emergency generator located within a bunded generator house.	If a loss occurs, it has the potential to enter storm water drains in the area. However, an attenuation tank (10,000L) is part of the existing storm water drainage system. This would collect any spill and hold it whilst the composition of the spill is determined and the route for offsite disposal chosen.
Drum Store				
Tetrahydrofuran Dichloromethane Petroleum ether Dimethylformamide Dimethylacetamide Diluted waste solvent	Chemicals will be offloaded from road vehicles on impermeable hardstanding (concrete) adjacent to the drum store.	Managed under offloading procedures. Offloading to be supervised by trained Agilent personnel. Spill kits to be provided.	No secondary containment for offloading of canisters and drums. However, this area will have impermeable concrete hardstanding and spill kits will be available to contain small losses.	If a loss to concrete hardstanding occurs, it has the potential to enter storm water drains in the area. However, an attenuation tank (10,000L) is part of the existing storm water drainage system. This would collect any spill and hold it whilst the composition of the spill is determined and the route for offsite disposal chosen.

Appendix D Management and Mitigation Measures for RHS Storage

Agilent Environmental Permit Application – Redacted for the Public Register

Site Condition and Baseline Report

Agilent Technologies LDA UK Limited

SLR Project No.: 410.064951.00001

4 July 2025

D.1 RHS Storage Management and Mitigation Measures.

Table D-3 RHS Storage Management and Mitigation Measures

Activity	Details
Relevant Hazardous Substances (RHS)	The details of the RHS stored or used by the site, along with details of other materials that are considered to represent a potential pollution risk are detailed in Table B-2. The location of each chemical storage area is shown in Drawing 005 attached. For the purpose of this SCR, only liquid materials, or materials with the potential to contaminate soil or groundwater are considered with a single container volume of 200L or more.
Bulk Storage	**Drum Store** The January 2023 Adler & Allan Initial Bund Inspection Report (reference CW/AGI/BUND/050123 dated 05 January 2023) confirmed that the drum store bund required some repair. Agilent subsequently undertook repairs to the following: • Cracking to the bund floor radiating from the entrance ramp. • Damage and chipping of concrete bund walls. • Concrete 'honeycombing' on external bund walls. • Heavy cement weathering on floor surface. • Re-seal of concrete core area to C736 standards. Resin injection methodologies (Fosroc Nitofill LV resin) were used in June 2023 to seal the cracks to the bund floor and to seal the reinstatement around a previous core sample hole. SLR Consulting visited site to assess the repairs on 02 August 2023. SLR concluded in a letter (Agilent Chemical Storage Bund Crack Repair Inspection, reference 403_065044_00001 dated 04 August 2023) that overall, works had been performed to a reasonable standard and SLR is content that the bund repairs are C736 compliant. Chemicals and waste in the drum store are stored on bunded stillages with 110% capacity and the drum store concrete bund is used as tertiary, rather than secondary containment. The drum store has a capacity of 12.5m^3. **Chemical Stores** The site also comprises the following storage areas: ***General Chemical Stores*** • CS01: Located indoors, on impermeable hardstanding. Bunded stillages used. • CS02: Located indoors, with perimeter concrete bunding with 1,250L capacity. ***Cold Stores*** • FR03, FR04, FR05: Located indoors, on impermeable hardstanding with bunded stillages. • FR06 is located in a shipping container with a perimeter bund located in the northwest corner of site. **Fuel** Diesel for the emergency generator is stored within the generator house.
Deliveries	Bulk deliveries of raw materials and diesel for the emergency generator is made via road vehicles. The site has an existing road vehicle offloading procedure that is used to control such activities and to ensure that provisions are in place to minimise the risk of a loss of containment during delivery. The procedure also details how to respond to such an event occurring, and minimise the volume of loss and contain it to site infrastructure where possible. All deliveries and offloading activities are accompanied and overseen by a trained site operative. All deliveries are scheduled as part of an inventory management system, and

Activity	Details
	delivery volumes are managed to ensure that the receiving chemical storage areas have the available capacity to receive the volume being ordered. Chemicals are unloaded from vehicles for transfer into indoor chemical storage areas by trained operatives using fork lift trucks or pallet trolleys. Spill kits are located in offloading areas in case of a spill.
Transfer and Use of RHS within the process	Transfers of drums and chemical canisters into the production areas will be undertaken by trained operatives using fork lift trucks or pallet trolleys.
Pollution Control Measures - Management Systems and procedures	The installation has an Environmental Management System (EMS) that is operated in accordance with ISO14001. The site has existing procedures on how to manage the following: • Delivery of raw chemicals. • Offloading chemicals. • Routine inspection of storage areas and associated containment. • Spill response. • Incident response. • Waste management. • Management of change. • Nuisance. • Environmental monitoring. Production on site is operated in accordance with Agilent planned maintenance programmes. Environmentally critical items will be identified within the EMS and registered in the onsite computerised software system. Activities associated with the proposed process will be undertaken by trained and competent personnel.
Pollution Control Measures - Containment Systems – Primary Containment	The specific containment details for proposed primary containment systems is included in the overall Land Pollution Risk Assessment Summary detailed in Appendix E. Typically, chemicals onsite are stored in 200 litre drums or canisters between 1 litre and 50 litre in volume. Diesel for the emergency generator is stored within a belly tank.
Pollution Control Measures - Containment Systems – Secondary Containment	The specific containment details for proposed secondary containment systems is included in the overall Land Pollution Risk Assessment Summary detailed in Appendix E. The drum store comprises bunded stillages with 110% capacity for use as secondary containment. The generator house and CS01 comprise impermeable concrete perimeter bunds. Chemical storage areas, CS02, FR03, FR04, FR05 are located indoors on impermeable concrete. Chemical storage area FR06 comprises a bunded shipping container. Infrastructure to manage drums and canisters will incorporate drip trays and bunded stillages.
Pollution Control Measures - Containment Systems – Tertiary Containment	The specific containment details for proposed tertiary containment systems is included in the overall Land Pollution Risk Assessment Summary detailed in Appendix E. **Offloading Areas** Offloading areas for the drum store, generator house and indoor chemical storage areas comprises impermeable concrete hardstanding. Spill kits are located in offloading areas. Chemical offloading does not occur in the southern portion of site near the soakaway. **Outdoor Areas** Areas where chemical handling may occur (i.e., drum store, generator house, surrounding units 2, 3 and 4) are served by the site's uncontaminated surface water drainage system.

Activity	Details
	This system incorporates a 10,000L attenuation tank where an accidental release could be held. This tank has the capacity to be sampled prior to discharge or removal by tanker. This tank is over pumped to the Severn Trent Storm Water Drainage Sewer along Essex Road through discharge point W2. **Chemical Storage Areas** The drum store comprises a concrete bund with 12.5m^3 capacity as tertiary containment. Following recent repairs, this bund is considered to be CIRIA 736 compliant. Chemical storage (CS01, CS02, FR03, FR04 and FR05) is located indoors away from the surface water and effluent drainage system. Spill kits are used to clean up spills in indoor areas should an accidental release occur. The generator house and cold store FR06 are located in the northwest corner of the site. Should a spill escape from these areas and reach the surface water drainage system it will be contained within the 10,000L attenuation tank. Effluent within the tank can be tested and the best route for disposal determined.
Site Drainage Systems	**Process Drainage** The following effluent is discharged to sewer via proposed emission point S1 under a set of four trade effluent discharge consents with Severn Trent (refer 410.064951.00001_BATOT): • Cooling and reverse osmosis water. • Laboratory water[17]. • Compressor condensate. • ion exchange[18]. • Sieving of polymer particles[19]. • Emptying of laboratory tanks[20]. **Effluent Drainage** The majority of chlorinated mixed solvents / water (57.19 tonnes in FY23) from the process is sent off site in drums and used for controlled incineration with heat recovery in a cement kiln. The constituents of this effluent are be monitored in accordance with the requirements of the receiving facility. **Storm Water Drainage** Uncontaminated rainwater from the southern car park and roof of Unit 1 flows into a soakaway within the car park at location W1 shown in Drawing 002. Chemicals are not stored in this area. Uncontaminated rainwater from the remainder of site drains into a 10,000 L underground attenuation tank, which is then pumped to discharge point W2 (shown on Drawing 002) for release into the local Severn Trent Storm Water drains. **Sewerage** Foul water generated by the site flows to the foul water drainage system and leaves the site through emission point S1 to join the Severn Trent foul sewer located on Essex Road. For all four drainage systems listed above, periodic inspection of the drainage system will be undertaken during the lifetime of the EP to assess the integrity of the drainage system. This will be managed via a pre-planned maintenance and inspection programme.

[17] Laboratory waste water containing small volumes of detergents, residual acetone, polymeric solids and de-ionised water from glassware washing.

[18] Ion exchange from the reverse osmosis process.

[19] Sieving of polymer particles containing predominantly mains water, with a small amount of inert polymeric solids. Sieves and filters are used to removed particulates for discharges to sewer.

[20] Emptying of laboratory tanks comprises reserve osmosis water, deionised water and mains water. This does not contain any R&D chemicals.

Activity	Details
On-Site Effluent Treatment	Chlorinated mixed solvent / water is collected in 200 litre drums, then transferred offsite and used as cement kiln fuel. Process cooling and equipment wash-water is discharged to sewer without treatment due to the nature of the effluent. Process cooling and equipment wash-water is discharged to a Severn Trent foul sewer via emission point S1 under four trade effluent discharge consents.
On-Site Sewage Treatment	Sewerage is transferred off site to the foul sewer on Essex Road for treatment by Severn Trent at the Church Stretton local treatment works.
Water Discharge	The proposed process will not discharge to controlled waters. Only uncontaminated rainwater flows to groundwater soakaway W1 in the southern car park. No chemicals are stored or handled in this area. Uncontaminated rainwater in the northern portion of the site collects in a 10,000L attenuation tank prior to it being over pumped to emission point W2 and Severn Trent storm water drains located on Essex Road.
Infrastructure Monitoring Programme	Primary, secondary and tertiary containment measures are incorporated into the existing onsite planned preventative maintenance (PPM) system. These systems are subject to regular inspection and maintenance. Risk-based inspection plans have been uploaded into the PPM system. These systems are operated under management procedures and be maintained by trained site operatives. Regular visual inspections of these systems will occur, in addition to periodic integrity testing where applicable. Periodic inspection of drainage systems (i.e., via CCTV surveys) will also occur. Systems will be operated in accordance with manufacturer's specifications. Refer to 410.064951.00001_BATOT for a full description of how these systems will be operated in accordance with best available techniques throughout the lifetime of the EP.

Appendix E Land Pollution Risk Assessment

Agilent Environmental Permit Application – Redacted for the Public Register

Site Condition and Baseline Report

Agilent Technologies LDA UK Limited

SLR Project No.: 410.064951.00001

4 July 2025

Appendix F Generic Baseline Assessment Methodology

Agilent Environmental Permit Application – Redacted for the Public Register

Site Condition and Baseline Report

Agilent Technologies LDA UK Limited

SLR Project No.: 410.064951.00001

4 July 2025

F.1 Suggested Soil and Groundwater Analysis

The suggested soil and groundwater analytical suite to target the potential contaminants of concern are presented in Table F-1 below.

This should be reviewed for suitability by the contractor undertaking the intrusive work. The analytical results will then be used to determine the environmental condition of the site and thus assess whether this condition is likely to have deteriorated since the EP was issued.

Table F-1 Suggested Analytical Suite

Location	RHS / Pollution Risk Identified	Proposed Analytical Determinand	Rationale
Vicinity of Drum Store	Tetrahydrofuran Dichloromethane Petroleum ether Dimethylformamide Dimethylacetamide Diluted waste solvent Diesel	Dichloromethane Speciated VOC Total VOC Speciated TPH PAHs Metals	Will identify any potential impacts from previous losses of process chemicals and the history of the site as a railway depot.
Emergency Generated House	Diesel	Speciated TPH PAHs Metals	Will identify any potential impacts from previous losses of diesel and the history of the site as a railway depot.
Note: This dataset is intended to be reviewed for suitability by the contractor undertaking baseline data collection.			

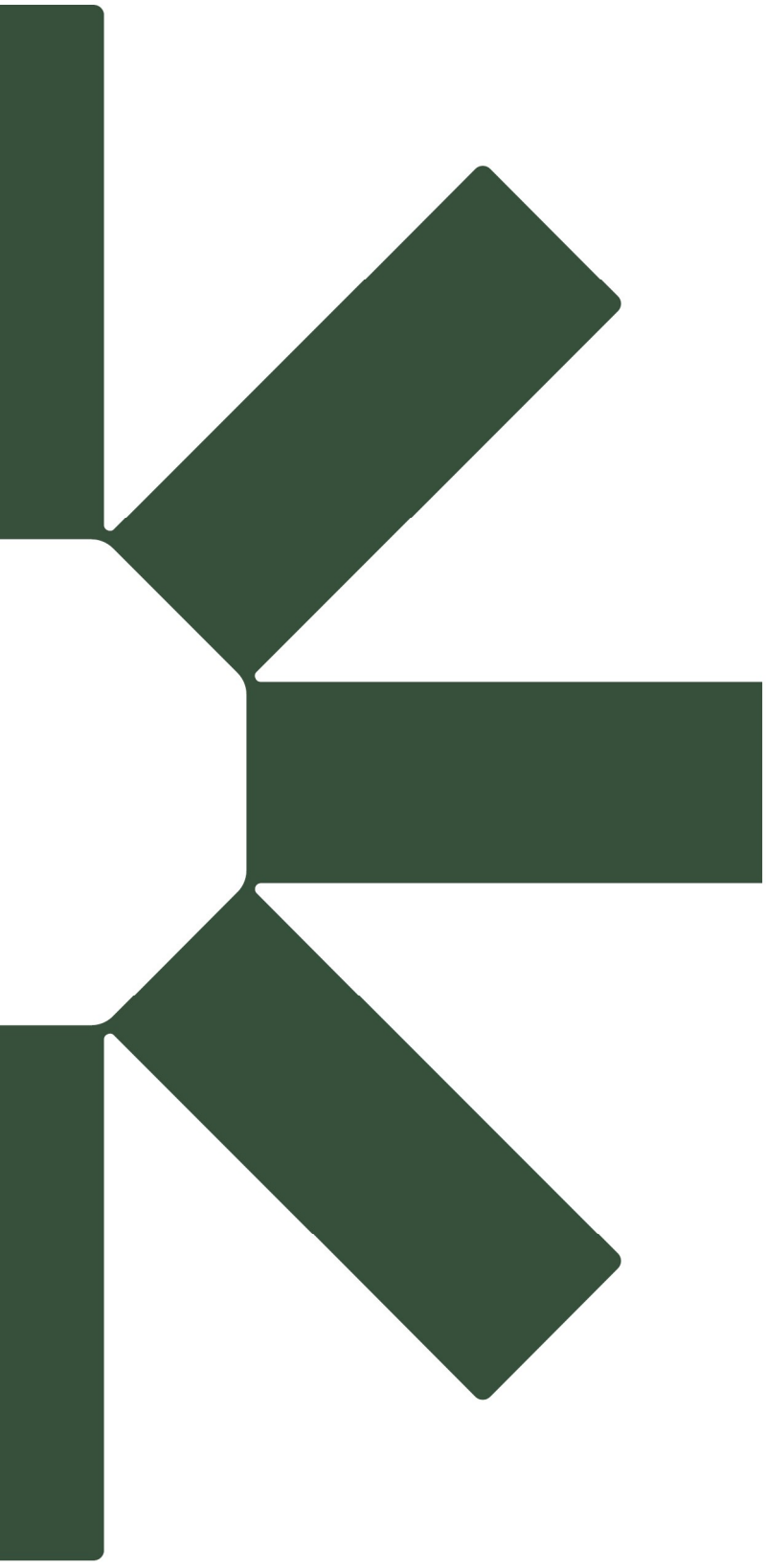
F.2 Typical Intrusive Baseline Assessment Methodology

Below presents a typical outline for a methodology on how to conduct baseline data collection. This methodology should be reviewed and tailored to the Agilent site prior to the commencement of any intrusive works.

Typically, a baseline environmental investigation would include the following scope of work:

- Advancement of soil boreholes to a determined target depth based on the local geology beneath the site. This is typically undertaken using a drill rig selected based on geology type.
- Collection of representative soil samples during excavation of the boreholes. Sampling and logging the soil strata is typically undertaken in general accordance with BS5930:2015+A1:2020. Visual and olfactory indications of contaminants would also be recorded.
- Field screening of soil samples for hydrocarbon vapours.
- Installation of groundwater and gas monitoring wells at select locations to enable collection of representative groundwater samples.
- Completion of a follow up round of gas and groundwater monitoring.

- It is common practice to analyse a minimum of two soil samples and a groundwater sample from each borehole location.
- Scheduling of a minimum of one sample from each borehole for laboratory analysis based on the analytes likely to be present in soil from review of the site history and conceptual site model presented in Section 6 above.
- Use of an MCerts accredited laboratory to undertake analysis of soil and groundwater samples.
- Presentation of the baseline environmental investigation as a factual report.



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