

Management of Surface Water Run-Off: Addendum to the Operating Techniques and Environmental Risk Assessment Reports

This addendum has been prepared in response to an Information Request, dated 2 July 2026, regarding the environmental permit application for the proposed Teesport Waste Storage Facility located at PD Ports, Middlesbrough, TS6 6UD, reference EPR/BP3320LB/A001.

In the original application it was proposed that surface water run-off would be collected and tankered off-site whilst a 6-month programme of sampling was carried out to characterise the level of contamination in surface water run-off. This would be facilitated through a pre-operational condition in the permit. The reason for this approach was that characterisation data for surface water run-off is not available for a new site and it is difficult to use data from other sites as none are likely to be similar in surface area, waste types or amounts. However, the EA has required that a risk assessment is required at the determination stage and a H1 Surface Water Risk Assessment (SWRA) has been carried out using surrogate data.

This addendum provides an update on the approach set out in the original Operating Techniques and Environmental Risk Assessment documents submitted with the application on 23 December 2025. References are provided to the sections within these reports which have been updated and the information in this note should be taken as superseding the original sections.

Operating Techniques

Section 6.4.1 Site Drainage System

This text below replaces all of the current section 6.4.1.

The site drainage system has been revised and is shown on Drawing 06 Drainage & Pollution V2. The entire permitted area benefits from an impermeable concrete surface. All rainfall-derived surface water from the site passes through a Class 1 interceptor and silt trap and is then collected within an attenuation tank before being released to surface water at location SW1 on the dockside.

The outflow from the attenuation tank is monitored to ensure that discharge to the dockside does not exceed the approved levels of contamination before it is released. The monitoring point M1 is shown on Drawing 06 V2.

The drainage system includes a shut-off Penstock valve that can be used to contain run-off on site and prevent releases to surface water in the case of any pollution incidents such as spillages or fires. In the event that contaminated water is present in the attenuation tank which exceeds compliance limits for discharge at release point SW1, it will be tankered off-site to an appropriately regulated site for treatment.

Section 6.4.2 Contamination Sources

The text below replaces the last paragraph in the current section 6.4.2.

The EA guidance suggests using data from a similar sized site to estimate the emissions for a new site. However, finding directly applicable data is not feasible for material storage sites as storage amounts and waste types, as well as rainfall profiles, are site-specific. An estimate of potential characteristics of run-off at the Teesport site has been developed using publically available data for a metal dockside storage site and assumed data for RDF as it has proven difficult to obtain the latter. Details of the characterisation are provided in the Surface Water Risk Assessment provided in addition to this addendum.



Section 6.5.1 Site Surfacing and Drainage

The text below replaces the second paragraph in the current section 6.5.1

As described in (revised) Section 6.4.1 and illustrated in Drawing 06 v2, the site consists of a single drainage system for all three storage areas.

The waterside edges of the site are cambered away from the Tees Dock to prevent run-off into the Dock in the event of severe rainfall or fire. The topography of bulk storage bays means that surface water runoff accumulates in the centre of the bay and enters the drainage system which directs it to the attenuation tank. Run-off from the temporary pre-loading stockpiles is collected in a separate drainage spur to the attenuation tank. The discharge from the attenuation tank is fitted with a Penstock valve to prevent discharge to surface water in the event of a pollution incident.

Section 7 Emissions Monitoring and Limits

The text below is additional and follows the first two paragraphs in the existing section 7.

In the interim, surrogate characterisation data has been used to carry out an environmental risk assessment of the discharge of the surface water run-off from the site. This is detailed in the H1 Surface Water Pollution Risk Assessment (SWPRA) report 416.067287.00002 submitted with the application. The SWPRA concludes that as all contaminants are expected to have been diluted to below their respective EQS concentrations prior to meeting the main channel of the River Tees that the extent of mixing zones is acceptable.

Environmental Risk Assessment

Section 2 Identifying the Risks

Table 2-1 Scope of Risk Assessment line 3, surface water, is revised to note that the type of risk assessment is 'Quantitative'.

Section 4.2.1 Site Drainage System

This text below replaces all of the current section 4.2.1 (and is the same as described in Section 6.4.1 of the OT – see above).

The site drainage system has been revised and is shown on Drawing 06 Drainage & Pollution V2. The entire permitted area benefits from an impermeable concrete surface. All rainfall-derived surface water from the site passes through a Class 1 interceptor and silt trap and is then collected within an attenuation tank before being released to surface water at location SW1 on the dockside.

The outflow from the attenuation tank is monitored to ensure that discharge to the dockside does not exceed the approved levels of contamination before it is released. The monitoring point M1 is shown on Drawing 06 V2.

The drainage system includes a shut-off Penstock valve that can be used to contain run-off on site and prevent releases to surface water in the case of any pollution incidents such as spillages or fires. In the event that contaminated water is present in the attenuation tank which exceeds compliance limits for discharge at release point SW1, it will be tankered off-site to an appropriately regulated site for treatment.

Section 4.2.3 Estimate of potential pollutants

The text below replaces the last paragraph in the current section 4.2.3



The EA guidance suggests using data from a similar sized site to estimate the emissions for a new site. However, finding directly applicable data is not feasible for material storage sites as storage amounts and waste types, as well as rainfall profiles, are site-specific. An estimate of potential characteristics of run-off at the Teesport site has been developed using publically available data for a metal dockside storage site and assumed data for RDF as it has proven difficult to obtain the latter. Details of the characterisation are provided in the H1 SWRA provided in addition to this addendum.

Section 4.2.4 Risk Assessment

The text below replaces all of section 4.2.4 of the original ERA.

As the Site will only accept clean metal scrap, and the RDF is stored in impermeable wrapping, the risk of contamination of rainfall run-off is low. In addition, procedures are in place to inspect the storage areas for signs of degradation of the RDP wrapping and accumulation of dust or leachate: should these be found, action to address the potential pollution source will be carried out to ensure that risks are minimised at all times.

The drainage system incorporates an attenuation tank which will be used to hold surface water to allow it to be sampled and tested for contamination before being released to the quayside. If contamination levels are unacceptable, water will be tankered off for treatment at an appropriately regulated facility. A qualitative risk assessment in Table 4-5 summarises the mitigation measures.

As the range and amount of contaminating pollutants in surface water run-off cannot be accurately estimated ahead of operation, it is proposed that a sampling programme is carried out over an initial 6-month period to obtain this data. Once reliable data has been collected, PD Teesport will carry out an H1 assessment to establish emission limits and monitoring, as appropriate, for ongoing operation of the site.

In the interim, surrogate characterisation data has been used to carry out an environmental risk assessment of the discharge of the surface water run-off from the site. This is detailed in the H1 Surface Water Pollution Risk Assessment (SWPRA) report submitted with the application, reference 416.067287.00002. The SWRA concludes that as all contaminants are expected to have been diluted to below their respective EQS concentrations prior to meeting the main channel of the River Tees that the extent of mixing zones is acceptable.

