



Site Condition Report

Hayes Data Centre Emergency Back-up Generation Facility

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1.0 Introduction

This Site Condition Report (SCR) (or 'Site Baseline report') has been prepared by HDR Consulting Limited (HDR) on behalf of the operator, *Amazon Data Services UK Limited* (AWS) in support of the Environmental Permit (EP) application for their site 'Hayes Data Centre Emergency Back-up Generation Facility' located at North Hyde Gardens, Bulls Bridge Industrial Estate, Hayes, UB3 4DG.

This SCR is intended to provide the Environment Agency (EA) with a description of the baseline conditions prior to site operations commencing. The baseline data presented herein should be referred to upon surrender of the sites environmental permit (once issued) to demonstrate no deterioration of the land has occurred due to operations.

This SCR has been prepared to cover the entire campus as has been covered by Planning Application [75111/APP/2022/1007]. This approach has been taken as the contaminated land investigations and subsequent remediation works have been carried out across the whole site prior to the decision being made that part of the site would be subject to this Permit Application (DP3442QV).

The extent of the land covered by this SCR and the Permit Application Area are clearly shown on the plan in Appendix As.

It should be noted that this SCR will likely also underpin future separate environmental permit applications for the remainder of the original site.

This report has been prepared based on the information made available and the conditions at the time of writing. This report is only valid to the extent that the information provided was accurate and complete. No intrusive sampling or assessments were completed as part of this assessment.

This SCR has been prepared in accordance with the EAs guidance for Applicants (H5) – Site Condition Report document with Sections 2-4 submitted with the application for a permit.

Sections 5-8 are to be maintained during the life of the permit.

Sections 9-11 are to be completed if / when the permit is surrendered.

2.0 Background

2.1 Site details

Name of the applicant	Amazon Data Services UK Limited
Name of the site	Hayes Data Centre Emergency Back-up Generation Facility
Activity address	North Hyde Gardens, Bulls Bridge Industrial Estate, Hayes UB3 4DG
National grid reference	TQ 10514 79252
Document reference and dates for Site Condition Report at permit application and surrender	Application submitted: 29 / 06 / 2022 Permit reference: DP3442QV Permit issued: Permit surrendered:
Document references for site plans (including location and boundaries)	Site Plan v1 (see Appendix A).

2.2 Site development plans

The operator, Amazon Data Services UK Limited (AWS) is currently developing part of the site into a Data Centre that will see a number of buildings constructed including an energy centre, visitor centre and multiple data halls with ancillary equipment. This will include x14 no. emergency diesel generators commissioned with associated fuel and urea storage tanks (Appendix A).

2.3 Site investigations

The following site investigations were completed as part of planning requirement for the development of the site.

- Phase 1 Environmental Risk Assessment Report (Appendix B).
- Phase 2 Environmental Site Investigation Report (Appendix C).

Supplementary reports to these have also been completed as follows:

- Detailed Quantitative Risk Assessment (Appendix E).
- Remediation strategy (Appendix F).
- Remediation Verification Report (Appendix G).

The Phase 1 and 2 reports were completed by Paragon in 2019 for due diligence purposes. These reports identified a risk of existing levels of contaminants due to historical land use with further recommendations for additional assessments to confirm. Additional boreholes were completed by Paragon in 2020. This identified that Detailed Quantitative Risk Assessment (DQRA) was required to understand the risks to the River Crane/Yeading Brook and provide parameters for remediation purposes. The DQRA showed that the site does not pose any significant risks to Controlled Waters (River Crane).

In addition to this, as agreed with the London Borough of Hillingdon, a Remediation strategy was to be prepared to discharge Condition 33 for planning ref. 75111/APP/2020/1955. To confirm that the mitigation measures outlined by the Remediation Strategy are implemented, a Verification Plan has been produced and provided to the contractor appointed for construction of the site.

The subsequent verification report demonstrates that the demolition and groundworks have been carried out in accordance with Planning requirements, contaminated areas have been remediated / capped and the report submitted to the LPA discharging condition 33, thus demonstrating that the site is free from potentially hazardous contamination.

3.0 Condition of the land at permit issue

Table 3.1 – Environmental setting

Condition area	Description
<p>Geology</p> <p>Data source:</p> <ul style="list-style-type: none"> • Appendix C – Phase 2 Environmental Site Investigation Report • Appendix D – Groundsure Report 	<p>The geology of the site is London Clay Formation, overlain by Lynch Hill Gravel, Alluvium and Langley Silt. Portions of the site are classified as made or infilled ground, although this is unknown/unclassified. This information is taken from the Groundsure maps and the 2019 ground investigation report.</p> <p>Site investigations completed in 2019, which included 36 exploratory holes, found that the made ground comprised of black sandy gravel of fine to coarse, angular to sub-angular brick, flint and clinker.</p> <p>Stability maps indicate that the site is very low risk for collapsible ground stability hazards, landslide ground stability hazards and negligible for ground dissolution stability hazards and running sand ground stability hazards.</p> <p>The site is low risk for running sand conditions and for shrinking or swelling ground stability hazards.</p> <p>The site is very low and moderate risk (moderate risk across most of the site) for compressible and uneven settlement hazards.</p>
<p>Hydrogeology</p> <p>Data source:</p> <ul style="list-style-type: none"> • Appendix A – Site Plan • Aquifer designation and Soilscape mapping available at www.magic.gov.uk 	<p>The site is located in an Unproductive Strata bedrock designation and therefore is in an area of low permeability with negligible significance for water supply and river base flow. The site is also located on a principal superficial aquifer and on a Secondary A aquifer. These were formally known as major and minor aquifers respectively. The principal aquifer can provide a high level of water storage and can support water supply/river base flow strategically. The Secondary A aquifer is similar but capable of these tasks on a local level.</p> <p>Due to the aquifers the site sits upon, there is a high level of groundwater vulnerability, meaning pollutants are easily transmitted within the near surface groundwater. The soil can be described as high leaching with absence of low permeability superficial deposits. There is no soluble rock risk within this site.</p> <p>There are 7 groundwater abstraction points within 2000m from the site and 1 surface water abstraction point. The site is not in a Source Protection Zone.</p> <p>The Department for Environment Food & Rural Affairs (DEFRA) “MAGIC map” tool shows that the soil scape has loamy soils with naturally high groundwater.</p>

Condition area	Description
<p>Hydrology</p> <p>Data source:</p> <ul style="list-style-type: none"> • Appendix D – Groundsure Report • Environmental Agency Flood map for planning 	<p>The River Crane runs along the Eastern site boundary and the Grand Union Canal is located South of the industrial estate. The River Crane leads into the Yeading Brooke and contains water year-round in normal circumstances. The risk of flooding from this source is reported as medium/high near the river source at the edge of the site boundary (1 in 30-year return), but non-existent within the permit boundary (greater than a 1 in 1000-year return).</p> <p>There have been 0 records of historical flood events within 250m of the river. The river is not thought to benefit from any flood defences and currently does not have any in place.</p> <p>There is a high risk of surface water (pluvial) flooding in some areas on site, with a 1 in 30-year return for 0.3-1.0m flooding. Extreme rainfall events can lead to this type of flooding. Surface water attenuation has been provided to accommodate all storms up to and including the 1 in 100-year return period with an allowance for 40% climate change..</p> <p>Flooding from groundwater is expected to be low across the full site with potential for moderate levels encroaching on the Western site boundary.</p>
<p>Ecological Designated Sites</p> <p>Data source:</p> <ul style="list-style-type: none"> • Appendix D – Groundsure Report 	<p>There are no Sites of Special Scientific Interest (SSSI), Ramsar sites, Special Areas of Conservation (SAC), Special Protection Areas (SPA), National Nature Reserves (NNR), Local Nature Reserves (LNR), Designated Ancient Woodland, Biosphere Reserves, Forest Parks, Marine Conservation Zones, Nitrate Sensitive Areas, Nitrate Vulnerable Zones or proposed/potential Ramsar, SAC or SPA within 2000m of site.</p> <p>There are three conservation areas within 200m of the site. These are:</p> <ul style="list-style-type: none"> • Bulls Bridge (83m SE) • Canalside (157m SE) <p>There are 15 areas of Green Belt within 2000m of the site. These areas are protected to prevent urban sprawl, meaning that the potential for future additional sensitive human receptors is unlikely. These Green Belts are located in Hounslow, Hillingdon and Ealing local authorities.</p>

Table 3.2 – Pollution history:

Condition area	Description
<p>Pollution incidents</p> <p>Data source:</p> <ul style="list-style-type: none"> Appendix D – Groundsure Report 	<p>According to Groundsure’s database there have been no historic pollution incidents on site.</p> <p>There are reports of 15 pollution incidents within 500m of the site. 14 of these have been classed as either No impact or Minor. The only Significant impact was in June 2020 and this was approximately 116m NE. This was pollution to water of an “unidentified oil”.</p> <p>There was a licensed pollutant release on site by British Airways. The operator held a Part B permit. The pollutant was released through Surface Cleaning. British Airways were also authorised to use Mercury and Cadmium within their operations, with the receiving water noted as Thames Estuary. This occurred 150m South of the site.</p>
<p>Historical land-uses and associated contaminants</p> <p>Data source:</p> <ul style="list-style-type: none"> Appendix D – Groundsure Report 	<p>Historical land use maps show that the railway has boarded the north of the site since at least the mid 1800’s, when the site was unoccupied. Between 1920 – 1935 there was major urbanisation of the surrounding area and also a Creosoting Works constructed on the northern half of the site. The Creosoting works remained onsite until sometime between 1964 – 1972, although it is not known if it continued to be in use for this full time period.</p> <p>By 1979 the Creosoting works had been demolished and a power station built, taking up most of the western portion of the site. The power station remained until around 2001 when the building was demolished and replaced with another building. This building has since been demolished and the new data centre complex constructed.</p> <p>The surrounding area has been used for several industrial purposes including a neighbouring Creosoting works to the east, various factory buildings to the east and west as well as joinery works, various railway works, and an asphalt plant to the north.</p> <p>The historical data maps suggest that there is potentially contaminative land from historical uses throughout the site.</p> <p>There is no evidence on the historical maps of the two Historical landfill sites which were located onsite.</p>

Condition area	Description
<p>Waste management facilities</p> <p>Data source:</p> <ul style="list-style-type: none"> Appendix D – Groundsure Report 	<p>Landfill Sites</p> <p>There are four Historical Landfill sites recorded within 500m of the site. Two of which were located on site. Details of these are shown below:</p> <ul style="list-style-type: none"> Unidentified Operator. Onsite. Inert, commercial, and household waste. Last recorded on 31/12/1936. Unidentified Operator. Onsite. Inert, commercial, and household waste. Last recorded on 31/12/1936. Unidentified Operator. 57m SE. Inert, industrial, commercial, household and special waste. Last recorded on 31/12/1949. Unidentified Operator. 116m NE. <p>No further details are provided on the above historic landfills. There are also no active landfill sites listed within 500m of the site.</p> <p>Licensed Waste Management Facilities</p> <p>There are nine Licensed Waste Management Facilities within 500m of the site:</p> <ul style="list-style-type: none"> 159m E, Operator: F M Conway Limited, Type of site: Physical treatment facility (>=75,000 tonnes), Annual tonnage: 304999 tonnes, License issued: 03/02/2015. 190m E, Operator: F M Conway Limited, Type of site: (>=75,000 tonnes), Annual tonnage: 270,000 tonnes, License issued: 03/02/2015. 219m N, Operator: Personal Hygiene Services Ltd, Type of site: Clinical waste transfer station (25,000 tonnes), Annual tonnage: 24,999 tonnes, License issued: 08/01/1999 and modified 13/09/2017. 227m N, Operator: Personal Hygiene Services Ltd, Type of site: Clinical waste transfer station (25,000 tonnes), Annual tonnage: 0 tonnes, License issued: 08/01/1999. 311m N, Operator: Rentokil Initial UK Ltd, Type of site: Special waste transfer station (25,000 tonnes), Annual tonnage: 0 tonnes, License issued: 27/09/1994 and modified 29/08/1997. 321m N, Operator: Rentokil Initial UK Ltd, Type of site: Special waste transfer station (25,000 tonnes), Annual tonnage: 0 tonnes, License issued: 27/09/1994 and surrendered 23/12/2008. 372m SE, Operator: Personal Hygiene Services Ltd, Type of site: Clinical waste transfer station (25,000 tonnes), Annual tonnage: 857 tonnes, License issued: 11/12/1991 and surrendered 31/07/2000. 428m E, Operator: J Simpson Waste Management Ltd, Type of site: Household, Commercial & Industrial waste transfer station (unknown tonnes), Annual tonnage: unknown, License issued: 08/04/2021. <p>Waste Exemptions</p> <p>There are 37 facilities within 500m of the site that have an exemption for waste activities such as storage, treatment, use or disposal of waste.</p>

Condition area	Description
	<p>Licensed Industrial Activities (Part A(1)) There are 9 records of Part A(1) installations regulated by the Environmental Permitting (England and Wales) Regulations 2016 within 500m of the site.</p> <ul style="list-style-type: none"> • 142m W, Nestle UK Ltd, Combustion (any fuel >= 50MW), Permit no.: VP3332ST, Status: Surrendered • 343m SW, FM Conway Ltd, Temporary storage of hazardous waste not under S5.2 pending activities listed in S5.1, 5.2, 5.3 and paragraph (b) of this section with a total capacity > 50 tonnes, excl. temporary storage where generated, Permit no.: TP3503LL, Status: Effective • 343m SW, FM Conway Ltd, Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes/day involving recycling or reclamation of inorganic materials other than metals or metal compounds, Permit no.: VP3630WE, Status: Superseded • 343m SW, FM Conway Ltd, Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes/day involving recycling or reclamation of inorganic materials other than metals or metal compounds, Permit no.: TP3503LL, Status: Effective • 343m SW, FM Conway Ltd, Associated process, Permit no.: VP3630WE, Status: Superseded • 343m SW, FM Conway Ltd, Associated process, Permit no.: TP3503LL, Status: Effective • 343m SW, FM Conway Ltd, Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment, Permit no.: VP3630WE, Status: Determination (not issued yet) • 343m SW, FM Conway Ltd, Temporary storage of hazardous waste not under S5.2 pending activities listed in S5.1, 5.2, 5.3 and paragraph (b) of this section with a total capacity > 50 tonnes, excl. temporary storage where generated, Permit no.: VP3630WE, Status: Superseded <p>Licensed Pollutant Release (Part A (2)/B) There are 14 records of Part A (2)/B installations regulated by the Environmental Permitting (England and Wales) Regulations 2016 within 500m of the site. One of these was located on site:</p> <ul style="list-style-type: none"> • British Airway, Surface Cleaning, Part B Permit, No enforcement <p>Licensed Discharges to Controlled Waters There are 3 sites with a permit issued under the Water Resources Act 1991 for discharges to controlled waters. These are located within 500m of the site.</p> <p>Pollutant Release to Public Sewer There are 3 records of discharges of special category effluents to public sewers within 500m of the site.</p> <p>List 1 Dangerous Substances There is 1 record of discharge of a List 1 Dangerous Substance within 500m of the site. The authorised substances were Mercury and Cadmium and were received by the Thames Estuary.</p>

Table 3 – Evidence of historical contamination

Condition area	Description																																
<p>Evidence of Historical Contamination</p> <p>Data Source:</p> <ul style="list-style-type: none"> Appendix C – Phase 2 Environmental Site Investigation Report Appendix D – Groundsure Report 	<p>The Groundsure report in Appendix D contains the BGS Estimate Urban Soil Chemistry ranges for Arsenic, Bio-accessible Arsenic, Lead, Bio-accessible Lead, Cadmium, Chromium, Copper, Nickel and Tin ().</p> <table border="1" data-bbox="667 432 1827 560"> <thead> <tr> <th>Arsenic</th> <th>B/A Arsenic</th> <th>Lead</th> <th>B/A Lead</th> <th>Cadmium</th> <th>Chromium 80-90</th> <th>Copper</th> <th>Nickel</th> <th>Tin</th> </tr> </thead> <tbody> <tr> <td>16-17 mg/kg</td> <td>2.8-3 mg/kg</td> <td>168-232 mg/kg</td> <td>115-159 mg/kg</td> <td>1.3-2.4 mg/kg</td> <td>67-85 mg/kg</td> <td>89-146 mg/kg</td> <td>36-65 mg/kg</td> <td>17-41 mg/kg</td> </tr> </tbody> </table> <p>The Groundsure report in Appendix D also contains the BGS Measured Urban Soil Chemistry for Arsenic, Lead, Cadmium, Chromium, Copper, Nickel and Tin from site topsoil.</p> <table border="1" data-bbox="819 683 1675 810"> <thead> <tr> <th>Arsenic</th> <th>Lead</th> <th>Cadmium</th> <th>Chromium</th> <th>Copper</th> <th>Nickel</th> <th>Tin</th> </tr> </thead> <tbody> <tr> <td>17.2 mg/kg</td> <td>230.3 mg/kg</td> <td>2.5 mg/kg</td> <td>85.4 mg/kg</td> <td>150.4 mg/kg</td> <td>66.7 mg/kg</td> <td>42.9 mg/kg</td> </tr> </tbody> </table> <p>In addition to the Groundsure reports, windowless sample boreholes and trial pits were taken at locations across the site in June and July 2019 (See Appendix C). Extensive laboratory testing of the borehole and trial pits identified Chrysolite asbestos fibre bundles within made ground, alongside exceedances for some metals, Polycyclic Aromatic Hydrocarbons (PAH) and Total Petroleum Hydrocarbons (TPH). It was recommended that the asbestos was removed or encapsulated. Groundwater and Leachate testing identified various contaminants that existed above the limit of detection. Low concentrations of heavy metals, PAH and petroleum derivatives were discovered in both the groundwater and leachate testing. The cyanide found in the groundwater testing is thought to be from an off-site source as it is not present within soil or leachate testing. Due to the site previously operating as a landfill site, presence of heavy metals such as arsenic, and hydrocarbons such as PAH, TPH, and benzene, are not unusual.</p> <p>A remediation strategy (Error! Reference source not found.) was prepared to comply with Planning Condition 31(1c) & 33 (Planning application ref: 5111/APP/2020/1955).</p> <p>As per Appendix C, E & F, PAH and TPH groundwater levels exceeded the Environmental Quality Standard (EQS) with respect to impacts on the River Crane and the Yeading Brook. However, it was concluded with a Detailed Quantitative Risk Assessment (DQRA) (Error! Reference source not found.), that remediation would not provide quantifiable benefit to controlled waters as Ammonia levels were already very high. In addition, it was concluded that the levels of hydrocarbons present in soil and groundwater on this site would be unlikely to require remediation. Gas monitoring on site also identified raised concentrations of CO₂, methane and naphthalene, indicating a risk of gas and vapour exposure. Ground will undergo capping to prevent potential releases and vapour resistant membranes to be installed (see Error! Reference source not found.)</p>	Arsenic	B/A Arsenic	Lead	B/A Lead	Cadmium	Chromium 80-90	Copper	Nickel	Tin	16-17 mg/kg	2.8-3 mg/kg	168-232 mg/kg	115-159 mg/kg	1.3-2.4 mg/kg	67-85 mg/kg	89-146 mg/kg	36-65 mg/kg	17-41 mg/kg	Arsenic	Lead	Cadmium	Chromium	Copper	Nickel	Tin	17.2 mg/kg	230.3 mg/kg	2.5 mg/kg	85.4 mg/kg	150.4 mg/kg	66.7 mg/kg	42.9 mg/kg
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Table 4 – Baseline soil and groundwater reference data

Condition area	Description
<p>Baseline soil and groundwater reference data</p> <p>Data Source:</p> <ul style="list-style-type: none"> Appendix C – Phase 2 Environmental Site Investigation Report 	<p>Extensive baseline soil and groundwater reference data has been obtained from the previously completed site investigation report (Appendix C).</p> <p>In relation to the permissible activities, only hydrocarbons associated with the use and storage of diesel fuel/HVO and urea are considered to be 'relevant hazardous substances' which will be in use at the site. These will be used to fuel the backup generators and the selective catalytic reduction technology and also will include any associated lubricant oil used during maintenance of the generators.</p>

Table 5 – Supporting information sources

Condition area	Description
<p>Supporting information and sources</p>	<p>Please see the following folders / documents that accompany the EPR application:</p> <ul style="list-style-type: none"> HAYES, Bulls Bridge - Phase 1 Enviro Risk Assessment REV D HAYES, Bulls Bridge - Phase 2 Ground Investigation Report Rev D HAYES, Bulls Bridge - Phase 2 Ground Investigation Report Rev D HAYES, Bulls Bridge - Remediation Strategy - Rev E HAYES, Bulls Bridge - Paragon DQRA Report FINAL Rev C Site Plan v1 Groundsure Insights Publicly available online geological mapping at www.bgs.ac.uk Aquifer designations available at www.magic.gov.uk Environmental Agency Flood map for planning

4.0 Permitted activities

Table 6 - Permitted activities

Permitted activities	Schedule 1 ref 1.1 Part A (1) a) (i) combustion plant >50 MWth. Operation of 14no emergency back-up generators totalling 112MWth, with Directly Associated Activities (DAA) including diesel fuel storage, urea storage and surface drainage system. .
Non-permitted activities undertaken	The installation boundary is limited to the permitted activities. The internal data halls and office space are not part of the permitted activities. In normal conditions these will operate using electricity provided by the national grid.
Document references for: <ul style="list-style-type: none">• plan showing activity layout; and• environmental risk assessment.	<ul style="list-style-type: none">• Site Plan v1• Environmental Risk Assessment v1• Drainage plan v1• HAYES, Bulls Bridge - Phase 1 Enviro Risk Assessment REV D

5.0 Changes to the activity

Have there been any changes to the activity boundary?	<i>n/a - To be completed if there are changes to the activity / on decommissioning.</i>
Have there been any changes to the permitted activities?	<i>n/a - To be completed if there are changes to the activity / on decommissioning.</i>
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	<i>n/a - To be completed if there are changes to the activity / on decommissioning.</i>
Checklist of supporting information	<i>n/a - To be completed if there are changes to the activity / on decommissioning.</i>

6.0 Measures taken to protect land

Checklist of supporting information	<i>n/a - To be completed on decommissioning and permit surrender.</i>
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7.0 Pollution incidents that may have had an impact on land, and their remediation

Checklist of supporting information	<i>n/a - To be completed on decommissioning and permit surrender.</i>
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8.0 Soil gas and water quality monitoring (where undertaken)

Checklist of supporting information	<i>n/a - To be completed on decommissioning and permit surrender.</i>
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9.0 Decommissioning and removal of pollution risk

Checklist of supporting information	<i>n/a - To be completed on decommissioning and permit surrender.</i>
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10.0 Reference data and remediation (where relevant)

Checklist of supporting information	<i>n/a - To be completed on decommissioning and permit surrender.</i>
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11.0 Statement of site condition

<i>n/a - To be completed on decommissioning and permit surrender.</i>

APPENDIX A
SITE PLAN

APPENDIX B

PHASE 1 ENVIRONMENTAL RISK ASSESSMENT

APPENDIX C
PHASE 2 SITE INVESTIGATION REPORT

APPENDIX D
GROUNDSURE REPORT

APPENDIX E
DETAILED QUANTITATIVE RISK ASSESSMENT

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