

### Introduction

This document is submitted to meet the requirement of Improvement Programme Item Number 33 of Table S1.3 of the EPR Permit, which stipulates that *'the operator shall submit a report on the baseline conditions of soil and groundwater at the installation'*.

### Baseline Conditions of Soil and Groundwater

The Defra/Welsh Government 2013 'Industrial emissions Directive EPR Guidance on Part A installations' guidance document has been referred to with regards to baseline reports and permit surrender. *Section 5.11* of the guidance states *'Existing installations already in operation on 7 January 2013 should already have a baseline report which satisfied the requirements. If not, one will be needed at the time of the first periodic review...'*

To confirm, the baseline report was submitted in September 2004 and contained the information therein necessary to determine the state of the soil and groundwater contamination so as to enable a quantified comparison to be made at the time of surrender of the permit. The baseline report comprised the following required elements:

- a review of current installation activities and surrounding land use;
- a historical map review to determine the land use history in the context of potentially contaminative activities;
- an assessment of the site's geology, hydrogeology and hydrology to determine the site's environmental setting and sensitivity;
- a summary of ground conditions following a series intrusive investigations; and
- an assessment of analytical data from to assess the degree and nature of contamination at the site

A letter from the Regulatory Officer, dated October 2004, confirmed that the report met the requirements and will be the minimum standard that the site will be expected to be left in should the operation cease.

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