



ENVIRONMENTAL PERMIT SURRENDER

PEMBROKESHIRE COUNTY COUNCIL UNIT 41 WASTE TRANSFER STATION

Surrender Site Condition Report
Environmental Permit Reference: EPR/PB3490HV

Date: February 2024

Project code: 416.063954.00001

About WRAP

WRAP is a climate action NGO working around the globe to tackle the causes of the climate crisis and give the planet a sustainable future.

Our core purpose is to help you tackle climate change and protect our planet by changing the way things are produced, consumed, and disposed of.

Document reference:

416.063954.00001 - Surrender Site Condition Report

Written by: SLR Consulting Ltd



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Acknowledgements

The content of this Report has been based upon information provided by WRAP Cymru and Pembrokeshire County Council.

1.0 Introduction

The Waste and Resource Action Programme (WRAP), on behalf of Pembrokeshire County Council (PCC) has retained SLR Consulting Limited (SLR) to prepare an application to partially surrender the Environmental Permit (EP) (Ref: EPR/PB3490HV) at the Unit 41 Waste Transfer Station (WTS), located at The Dockyard, Pembroke Dock, Pembrokeshire.

The objective of a Site Condition Report (SCR) is to record and describe the condition of the land at the site at particular points in time such that an environmental baseline of the condition of the land can be set and used to demonstrate that the operator has protected land and groundwater during the lifetime of the site and that the land is in a satisfactory state at the time of EP surrender.

The area of the EP to be surrendered is illustrated on Drawing 001A as the blue hatched area labelled Unit 29 Partial Surrender.

1.1 Regulatory Background

The site operates under an EP (Ref: EPR/PB3490HV) originally issued to PCC in January 2015 under a revised number (Ref: EPR/CB3793HE). The EP was transferred to Sundorne Products (Llanidloes) Limited in March 2015 when the current EP reference number was assigned. The EP was varied four times before it was transferred back to PCC in August 2018. In September 2019 a partial surrender of a section of land from the permitted area that had not been used for any waste operations was completed. The EP was varied in March 2020 to extend the EP boundary to include Units 29 and 29A, increase the permitted waste types to be accepted on site, and to revise the permitted treatment operations to baling and bulking up of waste only.

An application to partially surrender the area of land to the south of the Unit 41 entrance was submitted to NRW in December 2022 and issued 1st August 2023.

Units 29 and 29A have been used by PCC for the internal storage of residual (grey/black bag) waste, dry mixed recyclables (DMR), and Absorbent Hygiene Products (AHPs) in designated Legato block bays. The AHP waste has been stored within a sealed container within the designated bay. The units also housed two contingency storage bays. Unit 35 has provided welfare facilities and was used for storage of new / unused recycling containers / bags only and has therefore never had any waste stored in it.

1.2 Report Contents

NRW application from part E2 requires the submission of a SCR which describes the condition of the site. At EP surrender, NRW's H5 Guidance¹ requires a SCR to summarise the information recorded during the life of the EP and to provide the evidence necessary to demonstrate that the site does not pose a pollution risk and is in a satisfactory state.

A SCR was not produced for the original application or during the operation of the site by Sundorne Products (Llanidloes) Limited. A SCR was prepared as part of the March 2020 EP variation application to establish the baseline environmental conditions within the EP boundary. Therefore, sections 1 to 3 of NRW's SCR template were completed as part of the March 2020 EP variation (Appendix 01), which comprised the following:

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

There have been no changes to the activities or pollution incidents on site since the SCR was originally prepared in March 2020 (Appendix 01). An application to partially surrender the area of land to the south of the Unit 41 entrance was submitted to NRW in December 2022 (and issued in August 2023) and sections 4 to 7 of the SCR template were updated. Sections 4 to 7 include the following:

- Changes to the Activity;
- Measures taken to protect land;
- Pollution incidents that may have had an impact on land, and their remediation; and
- Soil, gas and water quality monitoring (where undertaken).

In accordance with NRW's H5 Guidance, sections 1, 8, 9 and 10 are required to be presented for the purposes of EP surrender and include the following:

- Decommissioning and removal of pollution risk;
- Reference data and remediation (where relevant); and
- Statement of site condition.

¹ NRW Guidance for Applicants H5, Site condition report – guidance and templates, October 2014: [Environmental Permitting Regulations, Guidance for applicants H5, Site Condition Report, Guidance and Template \(cyfoethnaturiol.cymru\)](#)

For completeness, all sections of NRW's SCR template have been included within the Surrender Site Condition Report.

2.0 Site Condition Report H5 Template

1.0 SITE DETAILS	
Name of the applicant	Pembrokeshire County Council
Activity address	Pembrokeshire County Council Waste Transfer Station, Unit 41, The Dockyard, Pembroke Dock, Pembrokeshire, SA72 6TD
National grid reference	SM 95702 03746

Document reference and dates for Site Condition Report at permit application and surrender	<p>At permit application:</p> <ul style="list-style-type: none">○ Appendix 01: Pembrokeshire County Council Waste Transfer Station – Site Condition Report (SLR Ref: 416.00798.00037/SCR dated May 2019). <p>Milford Haven Port Authority (MHPA) are the current landowner and landlord and hold extensive site investigation reports relating to the condition of the land:</p> <ul style="list-style-type: none">○ Appendix 02: RPS, Ground Investigation Report Pembroke Dock Marine Development on Behalf of Milford Haven Port Authority (Ref: JER1262 dated January 2019);○ Appendix 03: MLM Consulting Engineers Ltd, Building 41 Pembroke Dock Phase 1 Preliminary Contamination Assessment Report (Ref: 771879-REP-ENV-001 dated April 2014); and○ Appendix 04: ExCAL Limited, Pembroke Dock Recycling Facility, Environmental Management System
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	<p>(Ref: 240-02-01-15, dated December 2015).</p> <p>At permit surrender:</p> <ul style="list-style-type: none"> ○ Pembrokeshire County Council Waste Transfer Station – Site Surrender Condition Report (SLR Ref: 416.063954.00001/SSCR), dated December 2022 (land south of Unit 41 entrance). ○ Pembrokeshire County Council Waste Transfer Station – Site Surrender Condition Report (SLR Ref: 416.063954.00001/SSCR), dated February 2024 (Unit 29, 29A, and 35).
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Document references for site plans (including location and boundaries)	<p>Drawing 001A Partial Surrender Area</p> <p>Drawing 002 Proposed Environmental Permit Boundary</p> <p>Drawing 004 Site Layout and Fire Management</p>
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Note:

In Part A of the application form you must give us details of the site's location and provide us with a site plan. We need a detailed site plan (or plans) showing:

- Site location, the area covered by the site condition report, and the location and nature of the activities and/or waste facilities on the site.
- Locations of receptors, sources of emissions/releases, and monitoring points.
- Site drainage.
- Site surfacing.

If this information is not shown on the site plan required by Part A of the application form then you should submit the additional plan or plans with this site condition report.

2.0 CONDITION OF THE LAND AT PERMIT ISSUE	
<p>Environmental setting including:</p> <ul style="list-style-type: none"> ○ geology ○ hydrogeology ○ surface waters 	<p>Please see Section 2.0 of Appendix 01 (Pembrokeshire County Council Waste Transfer Station – Site Condition Report (SLR Ref: 416.00798.00037/SCR dated May 2019).</p>

<p>Pollution history including:</p> <ul style="list-style-type: none"> ○ pollution incidents that may have affected land ○ historical land-uses and associated contaminants ○ any visual/olfactory evidence of existing contamination ○ evidence of damage to pollution prevention measures 	<p>Pollution Incidents</p> <p>Pollution incidents on-site and within the surrounding area have been identified using the Envirocheck Report (Ref: 300391397_1_1) 25th August 2022, included as Appendix 05 in addition to the pollution incidents identified in Section 2.0 of Appendix 01 (Pembrokeshire County Council Waste Transfer Station – Site Condition Report (SLR Ref: 416.00798.00037/SCR dated May 2019)).</p> <p><u>Substantiated Pollution Incidents</u></p> <p>The Envirocheck Report shows that there have been no substantiated pollution incidents on site. However, there have been three substantiated pollution incidents within 1000m of the site as described below:</p> <ul style="list-style-type: none"> ○ Incident Ref: 1380171 – on 12th October 2015, classified as a category 2 significant incident to air, category 4 no impact to water, and category 4 no impact to land, incident occurred approximately 36m south of the site. The pollutant was classified as an atmospheric pollutant with odour effects; ○ Incident Ref: 91886 – on 16th July 2002, classified as a category 2 significant incident to air, category 2 significant incident to land, and category 4 no impact to water, incident occurred approximately 554m south west of the site. The pollutant was classified as asbestos waste; and ○ Incident Ref: 1807087 – on 7th November 2018, a category 2 significant incident to water, category 3 minor incident to land, and a category 4 no impact to air, incident occurred approximately 594m south west
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	<p>of the site. The pollutant was classified as gas and fuel oils.</p> <p><u>Pollution Incidents to Controlled Waters</u></p> <p>The Envirocheck Report shows that there have been no pollution incidents to controlled waters on site. However there have been 16 pollution incidents to controlled water within 1000m of the site. Those within 500m of the site are described below:</p> <ul style="list-style-type: none">○ Incident Ref: 22726 – On 28th February 1995, a category 3 minor incident caused by spillage occurred approximately 101m north east of the site. The pollutant was farm effluent/slurry;○ Incident Ref: 34158 – On 26th November 1997, a category 3 minor incident caused by vandalism occurred approximately 191m south west of the site. The pollutant was heavy fuel oil; and○ Incident Ref: 35046 – On 13th January 1998, a category 3 minor incident caused by mechanical/electrical plant failure occurred approximately 292m north east of the site. The pollutant was oils – diesel (including agricultural). <p><u>Landfills and Other Waste Sites</u></p> <p>Two registered landfill sites are located within a 1000m radius of the site as described below:</p> <ul style="list-style-type: none">○ Registered landfill operated by Govan Davis Developments Ltd (Licence Ref: WDL/3/85) situated at Dry Dock & Part of West Llanion Pill, Pembrokeshire, approximately 745m east of the site.
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	<p>The landfill accepts stone, brick, hardcore and concrete waste; and</p> <ul style="list-style-type: none">Registered landfill operated by Govan Davies Dvlts Ltd (Licence Ref: WDL/2/83) situated at Old Dry Dock & Pill, Pembrokeshire, approximately 898m east of the site. The landfill accepts excavated natural materials, hardcore and rubble. <p>Three licenced waste management facilities are located within 500m of the site as follows:</p> <ul style="list-style-type: none">Licence number CP3298EV and 100411, operated by James Richard Gaze is situated approximately 17m north east of the site. The site is categorised as a metal recycling site (mixed). The licence was issued on 21st November 2008 and its' current status is 'effective';Licence number 34263, operated by David Sean Waters & Bernard Finnegan is situated approximately 62m east of the site. The site category is End of Life Vehicles. The licence was issued on 25th July 2005 and was revoked on 17th March 2011; andLicence number BB3591HX, operated by Milford Haven Port Authority is located approximately 344m east of the site. The site is categorised as a household, commercial and industrial transfer station. The licence was issued on 9th January 2022 and its' current status is 'effective'.
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	<p>Historical Land Use</p> <p>As described in Section 2.0 of Appendix 01 (Pembrokeshire County Council Waste Transfer Station – Site Condition Report (SLR Ref: 416.00798.00037/SCR dated May 2019)) the site history is as follows:</p> <p><u>On-site</u></p> <p>The site has a long history of industrial use, with the earliest available map from 1869 showing it was located within a Dockyard, and buildings identifiable on the site from 1968.</p> <p><u>Off-site</u></p> <p>The surrounding landscape has a long history of industrial use, although land to the south has a demonstrable history of residential and open areas in the form of Llanreath, Pembroke Dock and Barrack Hill.</p> <p><u>Historical Maps – On-site</u></p> <p>1869 Historical maps show the land to be within a dockyard but free from buildings and development</p> <p>1909 No change</p> <p>1953 The wider dockyard is now described as a Flying Boat Base, but there are no discernible infrastructural changes to the land</p> <p>1964 No change</p> <p>1968 Five buildings are present on site; two to the west, one to the east and two to the south</p> <p>1976 No change</p> <p>1985 No change</p>
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	<p>1994 No change</p> <p>2000 Removal of southern buildings</p> <p>2006 No change</p> <p>2019 A new unit is visible to the left of the western building units</p> <p><u>Historical Maps – Off-site</u></p> <p>1869 The northern land comprises an industrial dock, beyond which lies Milford Haven. To the east a factory lies adjacent to the site followed by various industrial and commercial buildings. A timber pickling pond lies adjacent to the south of the site, followed by a gas works 70m south and a Waste Transfer Station 300m south of the site. Beyond these lie Llanreath residential area and Barrack Hill. Marshland lies adjacent to the west, followed by Milford Haven approximately 20m west.</p> <p>1909 The surrounding landscape remains mostly unchanged. However, there is a noticeable build-up of land to the west of the site and also of mud to the north and west of the dockyard. The Gasworks to the south of the site is marked as disused, whilst a Dockyard Naval Hospital is visible in its place.</p> <p>1953 The Dockland on which the site is located is labelled as Flying Boat Base. A jetty has been built on the northern dock approximately 220m from the site.</p> <p>1964 The surrounding landscape remains relatively unchanged. A depot is visible 585m south.</p> <p>1968 Several new buildings are visible in close proximity to the northern boundary, but there is a visible reduction in the number of buildings to the east. Several new houses are</p>
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	<p>visible 150m south of the site, whilst a sewage works is visible adjacent to the west of the site.</p> <p><i>1976</i> There are an increased number of industrial and commercial buildings to the north and east. Masts are visible approximately 240m south, whilst Defensible Barracks are present 505m south east. To the west, a Royal Naval Boom Defence Depot is visible approximately 70m from the site.</p> <p><i>1985</i> There are no significant changes in the vicinity of the site.</p> <p><i>1994</i> The depot to the south of the site is marked as disused on the historical map from 1994.</p> <p><i>2000</i> The Royal Naval Boom Defence Depot is no longer visible on the map.</p> <p><i>2006</i> A vehicular ferry terminal is visible to the north of the site.</p> <p>As described in the MLM Consulting Engineers Ltd, Building 41 Pembroke Dock Phase 1 Preliminary Contamination Assessment Report, dated April 2014 (Ref: 771879-REP-ENV-001), included as Appendix 03 present day on site contamination risks are associated with:</p> <ul style="list-style-type: none">○ Historical steam sawmill, boiler shop and millwrights shop. Potential contaminants consist of metals, hydrocarbons, PAHs, and asbestos;○ Historical buildings, with potential contaminants including metals, PAH, and asbestos;
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	<ul style="list-style-type: none">○ Historical chimney with potential contaminants consisting of PAHs, and asbestos;○ Wartime bombing, with potential contaminants consisting of unexploded ordnance;○ Electrical apparatus with potential contaminants including hydrocarbons and PCBs; and○ Natural geology with potential contaminants consisting of radon gas.
Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	<p>Intrusive ground investigations were carried out by RPS in January 2019 as part of the 'Ground Investigation Report Pembroke Dock Marine Development on Behalf of Milford Haven Port Authority' (Ref: JER1262) included as appendix 02. Ground conditions encountered comprised Made Ground overlying weathered Pembroke Limestone Group and Pembroke Limestone Group. The human health risk assessment concluded that the risk to human health from the identified contamination would be largely mitigated by hardstanding over the majority of the site. The ground gas risk assessment recommended a classification of CS2 at this stage, with further monitoring to confirm this position. The site lies within a higher probability radon area. The controlled water risk assessment concluded that the risks to controlled waters are low for identified receptors.</p> <p>The MLM Consulting Engineers Ltd, Building 41 Pembroke Dock Phase 1 Preliminary Contamination Assessment Report (Ref: 771879-REP-ENV-001 dated April 2014), included as Appendix 03 found no evidence of potential contamination on site.</p>

	As described in Appendix 01 (Pembrokeshire County Council Waste Transfer Station – Site Condition Report (SLR Ref: 416.00798.00037/SCR dated May 2019)), the site has a history of industrial usage due to its location within the wider dockyard. Unit 29 was previously used as a boat painting unit, whilst the other units were used for heavy industrial use and fabrication until their re-design as a Waste Transfer Station.
Baseline soil and groundwater reference data	<p>Refer to:</p> <p>Appendix 01: Pembrokeshire County Council Waste Transfer Station – Site Condition Report (SLR Ref: 416.00798.00037/SCR) dated May 2019.</p> <p>Appendix 02: Ground Investigation Report Pembroke Dock Marine Development on Behalf of Milford Haven Port Authority (Ref: JER1262) dated January 2019.</p> <p>Appendix 03: Building 41 Pembroke Dock Phase 1 Preliminary Contamination Assessment Report (Ref: 771879-REP-ENV-001) dated April 2014.</p> <p>Appendix 04: ExCAL Limited, Pembroke Dock Recycling Facility, Environmental Management System (Ref: 240-02-01-15), dated December 2015).</p> <p>Appendix 05: Envirocheck Report (Ref 300391397_1_1) dated 25th August 2022.</p>
Supporting information	As above.

3.0 PERMITTED ACTIVITIES	
Permitted activities	<p>Household, commercial and industrial waste transfer station with treatment.</p> <p><i>Limit:</i> 74,000 tonnes per annum (tpa) of non-hazardous waste.</p> <p>D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary</p>

	<p>storage, pending collection, on the site where the waste is produced).</p> <p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced).</p> <p>D14: Repackaging prior to submission of any of the operations numbered D1 to D13.</p> <p>D9: Physico-chemical treatment not specified elsewhere in this Annex which results in final compounds or mixtures which are discarded by any means of any of the operations numbered D1 to D12 (e.g. evaporation, drying, calcination etc).</p> <p>R3: Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes).</p> <p>R4: Recycling/reclamation of metals and metal compounds.</p> <p>R5: Recycling/reclamation of other inorganic materials.</p>
Non-permitted activities undertaken	<p>Since 2018, whilst PCC have operated the site, permitted activities have taken place within Units 41, 29 and 29A as well as in storage bays to the east of Unit 41. Permitted activities will continue to take place within Unit 41, and the bays to the east of Unit 41.</p> <p>Non-permitted activities have included delivery vehicle movement in the north and a car parking area to the south.</p> <p>An exemption (S2: Storing waste in a secure place) is in place on site and has been used on occasion for the storage of glass outside in a dedicated container.</p>
<p>Document references for:</p> <ul style="list-style-type: none"> ○ Plan showing activity layout; and ○ Environmental risk assessment. 	<p>See Appendix 01 Pembrokeshire County Council Waste Transfer Station – Site Condition Report (SLR Ref: 416.00798.00037/SCR dated May 2019).</p>

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4.0 CHANGES TO THE ACTIVITY	
Have there been any changes to the activity boundary?	This EP partial surrender application seeks to surrender the permitted waste storage area covering Units 29, 29A and 35 as shown by the blue shading on Drawing 001A. The area has been used by PCC for the internal storage of residual (grey/black bag) waste, DMR, and Absorbent Hygiene Products (AHPs) in dedicated Legato block storage bays. The AHP waste has been stored within a sealed container within the designated bay. The units also housed two contingency storage bays. Unit 35 has provided welfare facilities and was used for storage of new / unused recycling containers / bags only and has therefore never had any waste stored in it.
Have there been any changes to the permitted activities?	<p>The EP has been varied several times since it was first issued in January 2015. The variations are described below:</p> <p>EP Transfer - March 2015 The EP was transferred in full (Ref: EPR/PB3490HV/T001) from PCC to Sundorne Products (Llanidloes) Limited.</p> <p>EP Variation – August 2015 The EP was varied (Ref: EPR/PB3490HV/V002) to include screening in the limits of activities issued to Sundorne Products (Llanidloes) Limited.</p> <p>EP Variation – February 2016 The EP was varied (Ref: EPR/PB3490HV/V003) to increase the EP boundary and to include additional waste types.</p> <p>EP Variation – December 2017 NRW initiated variation (Ref: EPR/PB3490HV/V004) to add in conditions relating to fire risk mitigation.</p>

		<p>EP Variation – March 2018 NRW initiated variation (Ref: EPR/PB3490HV/V005) to add in conditions relating to storage of waste and fire risk mitigation.</p> <p>EP Transfer – August 2018 The EP was transferred in full (Ref: EPR/PB3490HV/T006) from Sundorne Products (Llanidloes) Limited to PCC.</p> <p>Partial Surrender – September 2019 Partial surrender (Ref: EPR/PB3490HV/S007) of a section of land from the permitted area that had not been used for any waste operations.</p> <p>EP Variation – March 2020 EP variation (Ref: EPR/PB3490HV/V008) to expand the area of land in which waste storage and treatment can take place to include units 29 and 29a, increase the types of wastes that can be stored and treated, and to amend the permitted treatment process to baling and bulking up of waste only.</p> <p>EP Partial Surrender – August 2023. EP variation (Ref: EPR/PB3490HV/V009) to surrender the permitted area covering the land to the south of the Unit 41 entrance road as shown by the orange shading on Drawing 001A.</p>
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?		N/A – No change
Checklist of supporting information	<ul style="list-style-type: none"> ○ Plan showing any changes to the boundary (where relevant) ○ Description of changes to the permitted activities (where relevant) ○ List of 'dangerous substances' used/produced by the permitted activities that were not identified in the Application SCR (where relevant) 	

5.0 MEASURES TAKEN TO PROTECT LAND

A number of measures have been taken at the Unit 41 WTS to protect the land, these include:

- The entire site is impermeably surfaced with suitably designed hardstanding to prevent run off across bare soils and to reduce infiltration and leaching. All waste treatment and storage was undertaken on impermeable surfacing. Waste storage undertaken by PCC within Units 29 and 29A consisted of residual (grey/black bag) waste, DMR, and AHPs within dedicated Legato block bays. Contingency storage bays were also present in this area;
- Unit 35 has provided welfare facilities and was used for storage of new / unused recycling containers / bags only and has therefore never had any waste stored in it;
- All waste processing, undertaken by PCC, was carried out inside a building;
- The AHP has been stored within a sealed container within the designated bay;
- The site benefits from a sealed drainage system to foul sewer;
- All areas of site surfacing were inspected regularly and maintained at all times to preserve its integrity to remain impermeable;
- Strict waste acceptance procedures have governed the operations throughout the lifetime of the EP to prevent non-conforming waste from being accepted on site. Any rejected loads were recorded;
- Hazardous waste was not permitted for acceptance at the site;
- Only wastes and activities authorised by the EP have been carried out on site;
- All storage of waste was carried out on areas kept fit for purpose;
- The site is underlain by bedrock and has been redeveloped since WW2;
- All fuel and/or oils stored were kept within suitably bunded tanks and appropriately labelled;
- The site has operated in accordance with an Environmental Management System (included as Appendix 04) throughout the lifetime of the EP to reduce the pollution risk from the site; and
- Regular inspections were undertaken across the site in accordance with the site's Environmental management System (included as Appendix 04).

Checklist of supporting information

- Inspection records and summary of findings of inspections for all pollution prevention measures
- Records of maintenance, repair and replacement of pollution prevention measures

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

PCC have confirmed that, there have been no serious pollution incidents recorded that may have had a significant impact on the condition of the land.

There have been no recorded (within Appendix 05 Envirocheck Report) substantiated pollution incidents or pollution incidents to controlled water on the site.

Checklist of supporting information	<ul style="list-style-type: none"> Records of pollution incidents that may have impacted land Records of their investigation and remediation
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7.0 SOIL GAS AND WATER QUALITY MONITORING (WHERE UNDERTAKEN)

There is no requirement in the EP to complete soil, gas, or water quality monitoring due to the low risk nature of the activity on site.

Refer to:

- Appendix 01: Pembrokeshire County Council Waste Transfer Station – Site Condition Report (SLR Ref: 416.00798.00037/SCR) dated May 2019.
- Appendix 02: Ground Investigation Report Pembroke Dock Marine Development on Behalf of Milford Haven Port Authority (Ref: JER1262) dated January 2019.
- Appendix 03: Building 41 Pembroke Dock Phase 1 Preliminary Contamination Assessment Report (Ref: 771879-REP-ENV-001) dated April 2014.
- Appendix 04: ExCAL Limited, Pembroke Dock Recycling Facility, Environmental Management System (Ref: 240-02-01-15), dated December 2015).
- Appendix 05: Envirocheck Report (Ref 300391397_1_1) dated 25th August 2022.

Checklist of supporting information	<ul style="list-style-type: none"> Description of soil gas and/or water monitoring undertaken Monitoring results (including graphs)
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8.0 DECOMMISSIONING AND REMOVAL OF POLLUTION RISK

Describe how the site was decommissioned. Demonstrate that all sources of pollution risk have been removed. Describe whether the decommissioning had any impact on the land. Outline how you investigated and remedied this.

Checklist of supporting information	<ul style="list-style-type: none"> Site closure plan List of potential sources of pollution risk Investigation and remediation reports (where relevant)
	This SSCR only relates to the amendment of the EP boundary to remove the area of land covering Units 29, 29A, and 35 as illustrated on Drawing 001A by blue shading.

	<p>Units 29, and 29A were used for the internal storage of residual (grey/black bag) waste, DMR, and AHPs in designated Legato block bays and also provided contingency storage in accordance with the EP. Unit 35 has been used for welfare purposes and the storage of unused / new recycling containers / bags only.</p> <p>Units 29, 29A and 35 will be returned to the Port Authority at the end of the lease on 31st October 2024 in the same condition as at the start of the lease. It is confirmed that the area is no longer being used for waste storage as authorised by the EP. The legato blocks which formed the waste bays have been removed, the floor has been swept and the floor and walls have been washed to remove any residual contamination from the surfaces. No waste or potentially polluting material remains in the area to be surrendered. All mobile plant associated with waste activities has been removed from the area to be surrendered.</p> <p>The baseline conditions contained within the reports held by MHPA are considered to be in line with current site conditions, because the land has been protected (as described in Section 5.0). Furthermore, there have been no pollution incidents recorded that may have had a significant impact on the condition of the land. Therefore, it is highly unlikely that the area was contaminated or polluted during this time.</p>
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9.0 REFERENCE DATA AND REMEDIATION (WHERE RELEVANT)	
Checklist of supporting information	<ul style="list-style-type: none"> ○ Land and/or groundwater data collected at application (if collected) ○ Land and/or groundwater data collected at surrender (where needed) ○ Assessment of satisfactory state ○ Remediation and verification reports (where undertaken) <p>No land or groundwater data has been collected since the EP was first issued in January 2015, as there was no requirement to monitor in the EP and the area of land was never subject to the acceptance, storage or treatment of waste.</p> <p>As stated in Section 8.0, the baseline conditions contained within the reports held by MHPA are considered to be in line with current site conditions.</p>

10.0 STATEMENT OF SITE CONDITION

Using the information from section 3 to 7, give a statement about the condition of the land at the site. This should confirm that:

- The permitted activities have stopped
- Decommissioning is complete, and the pollution risk has been removed
- The land is in a satisfactory condition

In conclusion, it is considered that there has been little likelihood of pollution of the area of land covering Units 29, 29A, and 35 for the following reasons:

- Only permitted waste was accepted and stored in the area covering Units 29, 29A and 35;
- Appropriate measures have been taken to protect the land, including impermeable surfacing throughout and the implementation of Waste Acceptance Procedures; and
- There have been no recorded pollution incidents or non-compliances.

Land and groundwater have therefore been protected, and activities have not deteriorated the quality or condition of the land or groundwater. Therefore, the baseline site conditions contained within the reports held by MHPA are considered to be in line with current site conditions.

In addition by 31st October 2024:

- Permitted activities will have stopped within the area of land covering Units 29, 29A, and 35;
- Removal of all waste and associated mobile plant from the area covering Units 29, 29A, and 35 will be complete and all pollution risks will have been removed; and
- There will be no visual evidence of pollution within the area covering Units 29, 29A, and 35.

To summarise the land is considered to be in a satisfactory state, such that the surrender test requirements of Paragraph 14 of Schedule 5 of the EP (England and Wales) Regulation 2016 have been fulfilled. Therefore, this variation seeks to part surrender the land shown by blue shading in Drawing 001A. The new EP boundary is illustrated by Drawing 002.



**WRAP's vision is a thriving world in which
climate change is no longer a problem.**

Our mission is to make the world a more
sustainable place. We bring people together,
we act on the facts, and we drive change.

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