SITE CLOSURE PLAN

PB LEINER

The Clear Solution

ENVIRONMENTAL PERMIT
EPR/DP3030ZC

PB GELATINS UK LIMITED,
UNIT A6, SEVERN ROAD,
TREFOREST INDUSTRIAL ESTATE,
PONTYPRIDD, CF37 5SQ

ECL Ref: PBGE.01.14/SCP
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ACRONYMS/TERMS USED IN THE TEXT

ASTs	Above Ground Storage Tanks
ECL	Environmental Compliance Limited
EP	Environmental Permit
EQS	Environmental Quality Standard
ETP	Effluent Treatment Plant
HDPE	High Density Polyethylene
mbgl	metres below ground level
MNA	Monitored Natural Attenuation
NGR	National Grid Reference
NHHS	Notifications of Installations Handling Hazardous Substances
NRW	Natural Resources Wales
OS	Ordnance Survey
PAHs	Polycyclic Aromatic Hydrocarbons
PB Gelatins	PB Gelatins UK Limited
The Installation	PB Gelatins UK Limited Pontypridd Gelatin Production Facility
VOCs	Volatile Organic Compounds
SCP	Site Closure Plan
SCR	Site Condition Report
SI	Site Investigation
SVOCs	Semi-volatile Organic Compounds

DOCUMENT HISTORY

Doc Ref	Revision	Date	Prepared By	Checked By	Approved By
PBGE.01.03/SCP	Issue 1	Mar 2022	HR	SM	ND
PBGE.01.14/SCP	Issue 1	Apr 2025	BW	SC	ND
PBGE.01.14/SCP	Issue 2	June 2025	BW	SC	

1. INTRODUCTION

1.1. Purpose of the Site Closure Plan

1.1.1. Environmental Compliance Limited ("ECL") has been commissioned by PB Gelatins UK Limited ("PB Gelatins") to prepare a Site Closure Plan for their Pontypridd Gelatin Production Facility, hereafter referred to as "the Installation", located at Unit A6, Severn Road, Treforest Industrial Estate, Pontypridd, Rhondda Cynon Taff, CF37 5SQ.

1.1.2. This Site Closure Plan ("SCP") has been developed so that, in the event of closure, the Installation can be decommissioned safely, in a manner that will avoid the risk of pollution and return the site to a satisfactory state to enable surrender of the Installation's Environmental Permit ("EP"). Issue 1 of the previous SCP (PBGE.01.09/SCP) has been reviewed to reflect the changes which have taken place at the Installation due to the Installation of the new effluent treatment plant ("ETP").

1.1.3. The SCP focuses on the structures at the Installation which, if not appropriately decommissioned, have the potential to pollute the environment. The nature and quantities of materials used at the Installation that have the potential to cause pollution are considered in addition to the pollution history of the Installation (and the immediate surrounding areas).

1.2. Site Location

1.2.1. The Installation is located at Unit A6, Severn Road, Treforest Industrial Estate, Pontypridd, Rhondda Cynon Tadd, CF37 5SQ. The site is centred on Ordnance Survey ("OS") National Grid Reference ("NGR") ST 10190 86860. An indicative site location is provided in Figure 1 below.

Figure 1: Indicative Site Location

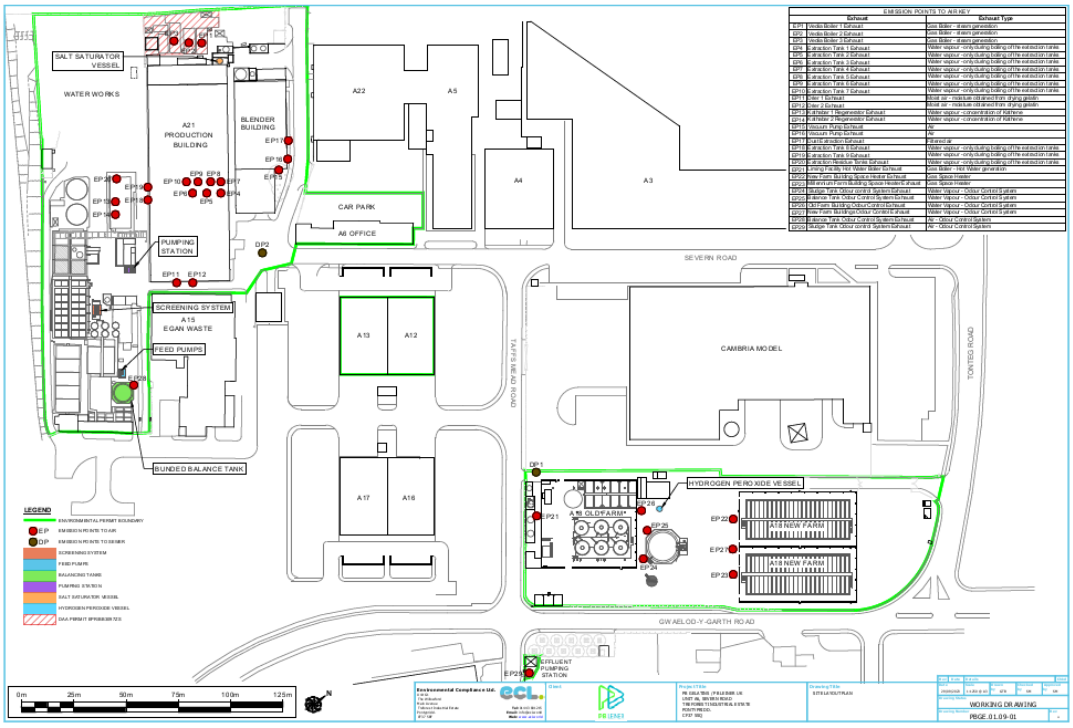
1.2.2. The Installation covers an area of approximately 3.85 hectares, comprising several discrete parcels of land within the northern area of Treforest Industrial Estate.

1.2.3. A Site Plan developed as part of the Installation's Site Condition Report ("SCR") document reference (PBGE.01.9/SCR) is provided in Appendix I and illustrates the parcels of land of which the site comprises:

- the water works zone;
- the location of the car park and offices;
- the effluent treatment plant;
- production and blending buildings; and
- additional operational and storage areas.

1.2.4. Figure 2 below illustrates these discrete areas with EP boundaries outlined in green. The Site Layout Plan contained below shows the expended EP boundary, which now includes Buildings A12 and A13, and is provided in Appendix I.

Figure 2: Installation Permit Boundaries



1.3. Overview of Activities

1.3.1. The Installation is a gelatin production facility where high purity gelatins are extracted from ossein for use in a range of applications including the food and pharmaceutical industries.

1.4. Geology and Hydrology at the Installation

1.4.1. Previous intrusive site investigations have been undertaken by Integral Geotechnique (Wales) Limited. Site Investigation Report 12588/PB/20/SCR, has therefore been used to

inform the geology and hydrology sections below.

1.4.2. The site is understood to be underlain by relatively homogenous 'Made Ground' which extends to a depth of 1.6 metres below ground level ("mbgl") and comprises of hardcore like materials and anthropogenic materials including brick, ash, clinker, metal, concrete and pottery. The presence of cobbles and boulders was noted within the made ground.

1.4.3. Contaminants including metals, semi-metals, polycyclic aromatic hydrocarbons ("PAHs") and hydrocarbon compounds were identified during soil sampling and laboratory analysis however these were considered unlikely to migrate and impact controlled waters.

1.4.4. Immediately underlying the Made Ground was a thin mantle of superficial clay which was subsequently underlain by superficial deposits comprising sands, gravels and cobbles. These variable, but predominantly cohesive alluvial soils were recorded to a proven depth of between 19.7 and 27mbgl.

1.4.5. Groundwater flow direction is anticipated to be north/easterly towards the River Taff. The site is underlain by shallow Secondary A aquifer and deeper Secondary A aquifer (permeable layers capable of supporting water supplies at a local rather than strategic scale).

1.5. Land Pollution History

1.5.1. A SCR was produced by Integral Geotechnique (Wales) Limited in 2020 and is provided in Appendix I of this SCP. An Envirocheck Report contained within the SCR revealed the existence of the land and groundwater pollution events which may have impacted the land or groundwater beneath the Installation. These are detailed in the sections below.

1.5.2. In October 2022, an updated site investigation was designed and undertaken to comply with PB Gelatins UK Limited's Environmental Permit ("EP") EPR/DP3030ZC, specifically Permit Condition 3.1.3. which states:

'Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.'

1.5.3. It was known at the time of the intrusive site investigation that the Environmental Permit boundary was to be expanded to incorporate the additional storage areas in Building A12 and A13 and therefore, the intrusive site investigation also included intrusive sampling near these areas.

1.5.4. The updated SCR (PBGE.01.09/SCR) dated December 2023 is included in Appendix I of this document, however previous SCRs referenced within it are still relevant and should be read in conjunction with it.

Landfill Sites

1.5.5. Table 1 details the two historic landfill sites listed within 500m of the Installation Permit boundary as identified within the Envirocheck report.

Table 1: Historic Landfill Sites within 500m of the Installation

Name	Waste Type	Distance from the Installation (m)	Direction
Power Station Hill Landfill/Tip	Not provided	278	west
Heol-Y-Bwnsy	Inert, industrial and household waste	344	north-east

1.5.6. The Envirocheck report also identifies three active waste management facilities within 500m of the site boundary as detailed in Table 2 below.

Table 2: Active Waste Management Facilities within 500m of the Installation

Name	Facility Type	Distance from the Installation (m)	Direction
Egan Waste Services Limited	Material Recycling Treatment Facility	18	south-west
Leiners Tip	Local Authority Landfill Site	342	north-east
Cynon Valley Waste Disposal Company Limited	Household Waste Amenity Site	449	south-east

1.5.7. No 'Notifications of Installations Handling Hazardous Substances' ("NHHS") or Planning Hazardous Substance Consents were identified within the Envirocheck report.

Pollution Incidents

1.5.8. Known site pollution incidents are considered when establishing site conditions.

May 2020 – Sodium Hydroxide

1.5.9. ECL have previously been commissioned by PB Gelatins to undertake a site investigation following an environmental incident involving the spillage of sodium hydroxide on the 26th of May 2020. The report (ECL.109.01.01/GIR) was submitted to NRW.

1.5.10. The incident on the 26th of May 2020 involved the accidental release of approximately 14 tonnes of liquid sodium hydroxide ("NaOH") from a bulk storage container, onto the concrete apron surrounding the storage vessel and into the Farm drainage system, following the delivery of 20 tonnes of NaOH.

1.5.11. A geo-environmental assessment, based on the findings of an intrusive investigation, was completed in order to assess the potential risk to human health and controlled waters.

1.5.12. A Dynamic Sampling (window sampling) rig was utilised to obtain the necessary soil samples from beneath the concrete pad in order to ascertain the level of contamination and satisfy 'Action 4' of Compliance Assessment Report ID: CAR_NRW0036724 (dated 22/06/2020). Soil geo-chemical analyses were scheduled on samples obtained from within the spill impacted area and one location (HDP1), not known to have been impacted by the spillage of NaOH.

1.5.13. The analysed soil samples, from beneath the concrete hardstanding, did not show evidence of impact from the NaOH spillage and it was therefore considered that ground materials had not been impacted by the spillage. The concrete hardstanding and drainage system, within the investigated site area, was observed to be in good condition with no visible cracks or other immediate pathways for contaminants at ground surface to reach ground materials below; pipework and services from the bulk storage containers were noted to run above ground.

June 2020 – Sodium Hydroxide

1.5.14. ECL has previously been commissioned to undertake a site investigation in response to a sodium hydroxide spill within the PB Gelatins' EP boundary in a site area operated by Veolia Energy and Utility Services UK Plc ("Veolia") permitted by Directly Associated Activity ("DAA") EP EPR/BB3097ZS.

1.5.15. The incident occurred on the 11th June 2020 and involved the uncontrolled release of approximately 20 tonnes of liquid NaOH onto land. This incident was a result from Veolia staff leaving a valve open and unattended, which resulted in the spill of caustic.

1.5.16. The immediate spill response involved isolation of the caustic supply at source within the PB Gelatins factory building as well as locking the pipeline off at the delivery point to Veolia's site.

1.5.17. The initial clean -up process took place on the afternoon of Thursday the 11th June. The surface liquid was removed by vacuum tanker. The spill area was then washed down and the resulting washings were also removed by vacuum tanker.

1.5.18. ECL's report assessed the soil, soil leachate and groundwater conditions at the site. No exceedances of the relevant site screening values, based on a commercial land use, were identified. However, exceedances of the environmental quality standards for groundwaters were identified.

1.5.19. Following this investigation, recommended localised remedial works were undertaken in response to the spill. At the time of writing, a programme of Monitored Natural Attenuation ("MNA"), to include six months of groundwater sampling is being undertaken within the Veolia operated area following NRW approval of the scope of the MNA works.

June 2022 – Effluent

1.5.20. PB Gelatins were notified by NRW on Monday 6th June 2022 that a substance likely to have arisen from within PB Gelatins' Installation boundary had been discharged into the River Taff (a controlled water).

1.5.21. It is understood by PB Gelatins that NRW also undertook further investigation of the release to the River Taff as it was strongly suspected to comprise bone and effluent alleged to have arisen from the Installation

1.5.22. An investigation into the cause and impact of the incident was launched by PB Gelatins.

1.5.23. Investigation of the effluent discharge by PB Gelatins found that the incident arose due to

the degradation of the below ground drainage system at the Installation. Following identification, inspections of the drainage were undertaken, and rectification measures were undertaken on the pipework. The changes were covered as part of a Permit variation to include a new effluent treatment for the effluent resulting from Building A21 activities and also involved the reconfiguration of the drainage network to eliminate the use of aged pipework across the Industrial Estate connecting the A21 and the Old and New Farm buildings. These changes are discussed in more detail in Section 4 of ECL report PBGE.01.09/EPTR

1.5.24. Section 7 of ECL Report PBGE.01.09/SCR , covers both

- the intrusive site investigation and results to satisfy EP condition 3.1.1 (5 and 10-year soil and groundwater sampling) in accordance with NRW SCR template[1] and;
- the assessment of continued suitability of the effluent subsurface drainage system in response to Compliance Assessment Report ("CAR") reference CAR_NRW0040197.

1.5.25. Elevated calcium concentrations were recorded downgradient of the suspected effluent drainage line breach. Whilst no Environmental Quality Standard ("EQS") for calcium applies, calcium is utilised within the liming process by PB Gelatins therefore it is possible that downgradient groundwater may have been impacted. However, it should be noted that calcium is a major component of many rock-forming minerals, and concentrations of calcium in groundwater are likely to be of natural origin. However, it was recommended that further sampling of groundwater would be required to confirm any trends in concentrations.

Historic Pollution Incidents

1.5.26. Historically, the previous Envirocheck report identified ten pollution incidents to controlled waters within 500m of the Installation boundary. It should be noted that none of those identified incidents have occurred in recent years, the latest incident took place 28 years ago in 1997. These incidents are detailed below in Table 3.

[1] https://cyfoethnaturiol.cymru/media/1213/site-condition-report-template.pdf [Accessed 30/05/2025]

Table 3: Pollution Incidents within 500m of the Installation Boundary

Date of Incident	Description	NGR	Distance from the Installation (m)	Category Rating
01/10/94	Not provided	310520 186950	36	3 – Minor Incident
03/08/96	Not provided	310500 187050	48	3 – Minor Incident
13/12/95	Accidental spillage/Leakage Chemicals – other Organic	310300 186700	85	3 – Minor Incident
23/11/94	Farmland Run-off	310600 186900	129	3 – Minor Incident
21/10/94	Not provided	310600 186895	131	3 – Minor Incident
18/10/91	Not provided	310800 187100	333	3 – Minor Incident
02/04/97	Poor Management Cement/Mortar	310705 186405	495	3 – Minor Incident
17/08/91	Mechanical Failure Algae	310700 186400	496	3 – Minor Incident
02/04/97	Poor Management Cement/Mortar	310705 186400	499	3 – Minor Incident
06/02/95	Miscellaneous – Tip Leachate	310700 186395	500	3 – Minor Incident

Historic Activities on Site

1.5.27. The Site Condition Reports undertaken by Integral Geotechnique contained within PBGE.01.09/SCR, identified previous site uses, which may have resulted in historical land or groundwater contamination beneath the site. Previous uses of the site include a metal alloy works with potential contaminants including metals and metalloids, non-metals/inorganics, semi-metals, PAHs, Volatile Organic Compounds ("VOCs"), Semi-Volatile Organic Compounds ("SVOCs"), and hydrocarbons including fuels/oils, solvents, mineral/organic acids. The site is also known to have previously hosted heavy and light industrial uses with potential contaminants including, metals, inorganics and non-metals, PAHs, fuels/oils, acids and alkalis.

Current Site Activities

1.5.28. The site is currently in use to produce gelatin. PB Gelatins extract high purity gelatine from ossein for use in a range of applications including the food and pharmaceutical industries.

1.6. Site Protection and Monitoring Programme

1.6.1. PB Gelatins are required to undertake monitoring of soil and groundwater in line with Condition 3.1.3 of the Installation's Environmental Permit EPR/DP3030ZC.

> *"3.1.3. Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination."*

1.6.2. The October 2022 intrusive site investigation designed by ECL was to satisfy condition 3.1.3 above along with the Compliance Assessment Report ("CAR") reference CAR_NRW0040197 produced by NRW at the time of the incident in June 2022. The analytical results, along with the borehole logs of the Site Investigation Report are provided within ECL report PGBE.01.09/SCR.

1.7. Environmental Management System

1.7.1. PB Gelatins have implemented an Environmental Policy and Environmental Management System at their Treforest Facility. This includes a commitment to pollution control and strives to minimise the potential for any detrimental effects on the environment.

2. BELOW GROUND STRUCTURES

2.1. Underground Storage Tanks/Vessels

2.1.1. There are 2 below ground storage tanks at the Installation. The pumping station adjacent to the "Keyline" site on Taffs Mead Road and the subsurface bunded A21 untreated effluent holding tank.

2.2. Underground/Subsurface Pipework

Effluent Drainage Systems

2.2.1. Effluent is generated during many of the stages of gelatin production at the Installation. Effluent from various process areas of the Installation is channelled via site infrastructure and the drainage network. Effluent treatment consists of effluent screening, settling, removal of suspended solids and pH correction. A new effluent treatment plant associated with building A21 operations was installed as an improvement post June 2022 incident. Extensive repair work was carried out to replace sections and provide lining to sections of the drainage network. Discharge point DP2 has not been connected to the foul sewer due to site closure plans. All effluent from the site, including surface water, leaves the site at DP1 into the foul drainage sewer under consent for final treatment externally by Welsh Water. Drawing Number PBGE.01.14-01 details the arrangement in Appendix III.

3. ABOVE GROUND STRUCTURES

3.1. Above Ground Storage Tanks/Pipework

3.1.1. Chemicals are used across the Installation in the gelatin production process, consequently, there are several above ground bulk storage tanks with associated pipework at the Installation.

3.1.2. Infrastructure inspections are undertaken on a weekly basis and are recorded, and rectification/maintenance actions determined. External tank integrity inspections are also undertaken annually and actions addressed as part of an annual action plan.

3.1.3. Bulk chemical storage arrangements at the Installation as detailed in the Installation's 2022 Raw Materials Review (Document Reference PBGE.01.03/RMR) are summarised in Table 4 below.

Table 4: Bulk Chemical Storage Arrangements

Substance	Typical Quantity Held on Site	Storage Arrangements
Lime Solutions of varying concentrations	c.225m^3	Stored in above ground storage tanks ("ASTs"), with above ground pipework.
Phosphoric Acid (75%)	c.38m^3	Stored in High Density Polyethylene ("HDPE") bulk storage tanks which have a dedicated bund and are fitted with an ultrasonic level indicator. Pipework is above ground.
Hydrogen Peroxide (35%)	c.15m^3	Stored in two HDPE bulk storage tanks with a dedicated bund.
Sodium Hydroxide (20%)	c.85.5m^3	Storage within three plastic storage tanks within a concrete bund. Pipework is above ground.
Sulphuric Acid (77%)	c.22.5 m^3	Storage in HDPE internally bunded storage tank. Pipework is above ground.
Hydrochloric Acid	35m^3	Stored in a HDPE bulk storage tank with a dedicated bund. Pipework is above ground.
Acetic Acid (80%)	8.5m^3	Storage within a HDPE tank with high level alarm.
Lithium Chloride	c.1m^3	Storage internally to site buildings in plastic/steel containers.
Sodium Hypochlorite (14 – 15%)	c.3m^3	Storage internal to buildings in plastic containers.
TRUFLOC TAC 40	c.18m^3	Stored in a HDPE helically wound storage vessel with integrated bund.
Coldfloc	c.2m^3	Storage internal so site building in intermediate bulk containers
TRUFLOC AWE 30	c.2m^3	Storage internal to site buildings in plastic drums.
Polymer Coagulant	c.2m^3	Storage internal to site buildings in intermediate bulk containers.
Dioxmax	c.2000L	Storage in intermediate bulk containers.
Diox 5000/50	c.2000L	Storage in intermediate bulk containers.

3.1.4. As detailed further in Section 4.2, prior to decommissioning, a full Site Audit will be undertaken to establish a complete inventory of all chemicals, raw materials and waste at the Installation. This will ensure that the quantities of chemicals detailed in Table 4 will be up to date at the time of closure.

3.1.5. Except for that mentioned in Section 2.2.3, all pipework serving bulk storage is above ground.

3.2. Other Above Ground Structures and Equipment

3.2.1. Figure 4 of ECL Report PBGE.01.09/SCR shows the condition of the concrete hardstanding within the newest buildings at the Installation. The concrete hardstanding is in good condition showing no signs of significant cracks or depressions. The buildings are isolated from the drainage network and there was no evidence of spills or loss of containment. Therefore, the risk to ground and groundwater is considered not significant.

3.2.2. Some buildings at the Installation are known to contain asbestos, but they are deemed low risk and monitored 6 monthly.

3.2.3. The latest Asbestos Reinspection Survey Report is attached to this report (see Appendix II) undertaken in June 2025.

3.3. Waste Storage Arrangements

3.3.1. There are dedicated process related waste storage arrangements at the Installation. Details of the process-related waste storage arrangements are provided in Table 5 below.

Table 5: Process Related Waste Storage Arrangements

Waste	Storage/Removal Arrangements
Ossein Solids	Deposited in a skip, which is collected and transported by third party contractor for appropriate disposal.
Ossein DAF Sludge	Pumped to a sludge tank which is emptied several times a week by tanker. DAF Sludge waste is collected by third party contractor for appropriate disposal.

4. DECOMMISSIONING ARRANGEMENTS

4.1. General Arrangements

4.1.1. In the event that PB Gelatins remain as the owners of the Installation at the time of its closure, the company will ensure that the Installation is decommissioned safely, in a manner that will avoid the risk of pollution of the ground, any underlying groundwater and watercourses, including the foul sewer, and return the site upon which the Installation stands to a satisfactory state.

4.1.2. Site structures will be decommissioned ensuring that the potential for uncontrolled releases from the Installation, including noise, dust, odour, and surface water run-off, during decommissioning will be minimised.

4.1.3. During all decommissioning works, suitable protection will be afforded to the ground to prevent pollution.

4.1.4. All general equipment and plant at the Installation will be cleaned and, where necessary, drained of potentially contaminating fluids before removal from the Installation. Where necessary, specialist contractors will be used.

4.1.5. Where possible, plant and equipment will be transferred for use at other PB Gelatins Sites. Specialist contractors will be used to transport equipment where necessary and the relevant documents required to transfer the equipment will be obtained.

4.1.6. To comply with Duty of Care obligations, PB Gelatins will ensure that any waste contractors who are used to remove waste materials from the Installation during the decommissioning works are suitably licensed, and that such waste is disposed of at a suitably licensed waste management or waste disposal facility and the relevant duty of care paperwork held by PB Gelatins, parent company for the statutory retention period of two years for non-hazardous material and three years for hazardous materials .

4.2. Specific Decommissioning Arrangements

4.2.1. Prior to decommissioning of the Installation activities, PB Gelatins will undertake a Site Audit to establish a complete inventory of all chemicals and waste at the Installation at the time of closure. The relevant documents for waste removals and decommissioning of plant and equipment will also be obtained prior to decommissioning.

4.2.2. All activities at the Installation will be gradually scaled down to reduce the quantities of raw materials held at the site and to enable finished product stored to be removed.

4.2.3. The Installation drainage system, including the effluent treatment facility and bunded subsurface tanks will be emptied and cleaned using an appropriate specialist subcontractor as part of decommissioning works.

4.2.4. A Request for Quotation (RFQ) for the cleaning work required on site will go to tender and a plan to safely dispose of the chemicals which will be left in the Installation's bulk and intermediate chemical storage vessels will be created and agreed with a suitably qualified and licenced contractor .

4.2.5. It is planned is to monitor the consumptions and stock levels, so that volumes will be minimised on site, this will then be diluted and then pH corrected in the effluent treatment plants. If levels are too great, a suitably qualified and licenced contractor will be contacted by PB Gelatins to empty and dispose of any remaining chemicals.

4.2.6. All waste storage containers and tanks will be emptied, cleaned out and removed by a suitably qualified and licenced contractor (in circumstances where it is not possible to return the storage vessel to the supplier).

4.2.7. The process areas will be cleaned and emptied prior to the effluent treatment areas.

4.2.8. Once the settling pits and reservoirs have been emptied and cleaned and any silt disposed of by a suitably qualified and licenced contractor , the drain valves will remain open, to reduce the amount of potential surface (rain) water, if the pits remain in-situ.

4.2.9. The PB Gelatins owned pumping station is not intended to be decommissioned, whilst PB Gelatins are on site, they will be maintained and operated by trained staff. As production ceases it will be purely surface water from the site that will enter the pumping station, however PB Gelatins as landowners will take responsibility for on-going maintenance and monitoring of the pumping station, via a third party contractor, and the trade effluent consent to discharge will remain in place, until a sale is agreed, and a consent revocation application will then be sought.

4.2.10. It is anticipated that the Installation buildings will be included in the sale of the site for future use. In the unlikely event that the Installation buildings are required to be demolished, this will be undertaken by specialist contractors in line with all relevant regulations and with suitable protection afforded to prevent the release of pollution.

4.3. Proposed Decommissioning Testing

4.3.1. A surrender SCR must be created, a new document, that must describe the condition of land and groundwater at the point of permit surrender; therefore (unless there is very recent information, post removal of all contamination sources) it can be assumed that additional Site Investigation ("SI") and monitoring would be required. The SCR must demonstrate that measures necessary to prevent contamination were appropriate and maintained throughout the lifetime of the permit; that any contamination that did occur was promptly and effectively dealt with; that records were kept demonstrating this; and the site is returned to a satisfactory state, having regard to the state of the site before the facility was put into operation.

4.3.2. The scope for any SI and monitoring would be based on the existing information from the various, previous SIs and review of site operations/management.

4.3.3. This information would be used to assess potential releases to soil and groundwater from the permitted activities, as opposed to other sources, (including historic land uses or migration from off-site, up-gradient sources).

4.3.4. Ground investigation data gathered at the time of permit surrender would be reviewed against historic data from the permit application, to show whether any contamination has taken place due to the operation of the site and to demonstrate that known contamination incidents have been successfully remediated. The report must demonstrate that unacceptable pollution risks have been removed, and the site is in a satisfactory state, for successful permit surrender

4.3.5. Previous intrusive investigations have revealed existing pollution at the Installation (See Section 1.4 and 1.5). Groundwater and soil monitoring is therefore required as part of the Installation's EP (See Section 1.6.). Any investigation works will be submitted to NRW for approval prior to the investigation works being undertaken.

4.3.6. If the investigation exposes the existence of pollution, PB Gelatins will liaise with Natural Resources Wales ("NRW") in relation to any remediation measures which may be required as part of on site decommissioning and permit surrender.

5. PERMIT SURRENDER

5.1. Criteria for Successful Closure

5.1.1. To determine that the Site Closure has been successful, PB Gelatins will ensure that the following criteria are met:

- all raw materials and surplus materials have been used or removed from the site;
- plant and equipment have been safety decontaminated using standard procedures and authorised contractors;
- all wastes and residues have been appropriately segregated, packaged, and removed from the Installation;
- the effluent treatment plant along with subsurface bunded tanks have been cleaned and flushed, it is envisaged that the management of surface water will continue through the effluent system exiting at the effluent pumping station to DP1 until the site is sold;
- the Grade 1 and 3 reservoirs, settling pits and flocculators that make up the waste treatment water works along with associated pipework have been cleaned, flushed and decommissioned/or drain valves left open;
- pumping station will discharge surface water only, and monitoring will demonstrate this;
- the relevant records relating to the tank and equipment decontamination and decommissioning have been retained throughout the closure process;
- the relevant records relating to waste and materials management have been retained throughout the closure process;
- no soil or groundwater contamination has taken place at the Installation as verified using monitoring data and a soil and groundwater assessment at the time of closure (if required);
- the site is returned to a satisfactory state, with any hazards and / or risks of environmental pollution addressed;
- the EMS is in place and has been actively implemented during the closure period; and
- a Site Verification Audit has been undertaken to complete the Installation closure.

5.2. Permit Surrender Application

5.2.1. Following the definitive cessation of activities, a Permit Surrender Application will be submitted to NRW and will include:

- Completion of the Surrender Site Condition Report which will include the steps taken (following this SCP) to decommission the Installation and remove sources of pollution risk;
- any investigation and / or remediation activities which have taken place at the Installation; and
- a statement of site condition confirming that the permitted activities have ceased, decommissioning is complete with any pollution risks removed and that the site is in a satisfactory condition.

APPENDIX I
ECL REPORT PBGE.01.09/SCR

APPENDIX II
ASBESTOS REINSPECTION SURVEY REPORT

APPENDIX III
CURRENT DRAINAGE LAYOUT
PBGE.01.14-01