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Flint
CH6 5EX

Ein cyf/Our ref: EPR/ BJ9703IM

Eich cyf/Your ref:

Dyddiad/Date: 29.04.2020

Dear Jan Partridge,

Environmental Permitting (England and Wales) Regulations 2016

RE: EPR Permit BJ9703IM Improvement Conditions 2 and 3, Updated H5 Site Condition Report

Information reviewed:

- a. Coleshill Mill, Flint – Updated H5 Site Condition Report. RSK, Reference: 325036-R1(04), October 2018.

Additional Information:

- b. Coleshill Mill, Flint – Updated H5 Site Condition Report; Factual Site Investigation Report. RSK, Reference: 325144/R01(01), October 2018.

NRW have reviewed the updated site condition report submitted to support the discharge of improvement conditions (IC 2 and 3) within the latest version of the Environmental Permit – BJ9703IM version 5, dated 2016.

Improvement Condition 2 – written protocol for monitoring soil and groundwater.

Table S1.3 Improvement programme requirements

Reference	Requirement
IC 2	The Operator shall submit the written protocol referenced in condition 3.1.3 for the monitoring of soil and groundwater for approval by Natural Resources Wales. The protocol shall demonstrate how the Operator will meet the requirements of Articles 14(1) (b), 14(1) (e) and 16(2) of the IED. <i>The procedure shall be implemented in accordance with the written approval from Natural Resources Wales.</i>

IED guidance suggests a monitoring frequency of 5 years for groundwater sampling, which the report recommendations reflect. We assume the proposed locations are as per the August 2018 monitoring network (BH101, BH103 to BH110 and BH106A), as defined in drwg 325144-Ro1(00)D004a and 325144-Ro1(00)D004b.

The groundwater quality monitoring suites included in Appendix E and Tables 10 and 14 are therefore the determinants suites to be tested.

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The operator should incorporate a specific monitoring plan for the next 5 to 10 years into the Environmental Management System, which should include all the monitoring locations (on a plan), the frequency of sampling and a list of determinants/suites to be tested.

NRW considers that the requirements of Improvement Condition 2 have been met.

Improvement Condition 3 – baseline conditions of soil and groundwater.

Table S1.3 Improvement programme requirements

Reference	Requirement
IC 3	The Operator shall submit a report on the baseline conditions of soil and groundwater at the installation. The report shall contain the information necessary to determine the state of soil and groundwater contamination so as to make a quantified comparison with the state upon definitive cessation of activities provided for in Article 22(3) of the IED. The report shall contain information, supplementary to that already provided in the application Site Condition Report, needed to meet the information requirements of Article 22(2) of the IED.

There is no conceptual site model derived from the collected data (i.e. using the August 2018 data along with 2000 data). A contour plot has been completed (drwg: 325144-R01(00)D005), which indicates that the ten boreholes installed are upgradient of the installation – boreholes in the area along the down gradient boundary of the two Zones (A & B) (i.e. eastern boundary) would more accurately reflect any existing contamination effects from on-site activities. We note that the 2000 boreholes BH1 to BH6 are also upgradient of the site and they are likely to have been lost so may not be as relevant. We recommend that the conceptual site model is updated using the 2018 data from the monitoring borehole installation

It should be noted that using the present data will potentially mean using more stringent clean-up standards during permit surrender – this is a risk for the permit holder to consider.

Three rounds of sampling are preferable for determination of base line conditions to be statistically viable – only one round has been completed in August 2018, one week after the borehole were installed. A minimum of one more round of groundwater sampling should be undertaken to determine baseline conditions. The baseline report should be resubmitted with the additional data.

NRW considers that further information (as detailed above) is required to satisfy Improvement Condition 3.

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Given the current COVID-19 related restrictions on working, social distancing and the associated difficulty in procuring laboratory services, the operator has agreed to make enquiries with the consultant about the likely timescales for additional monitoring that can be achieved. Once advice is received please provide a plan for the monitoring to take place and a revised deadline for submission will be agreed.

Yours sincerely



Siân McGregor-Andrew

Uwchswyddog Rheoliad Diwyddiant a Wastraff / Senior Officer Industry and Waste Regulation,

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