

Welsh Water IED Site Condition Report

- Afan

Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
A	26/10/21	A Khan / A Bagdadi	S Blackman	A Manns	First issue
B	14/04/22	E Jeffrey	S Blackman	A Manns	Updated following comments from NRW
C	27/07/22	N. Cunningham	S Stone	A Manns	Minor updates for submission to NRW
D	16/12/22	O Ellson	G.Peel	A Manns	Updated with amended site layout plan (schedule 5 response)
E	22/08/24	SM Bukar	S Blackman	A Manns	Update with amended site layout plan

Document reference: 100123523_SCR_AFA |

Information class: Standard

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Document purpose:

A Site Condition Report (SCR) provides information regarding the condition of the land and groundwater at permitted sites at particular points in time throughout its permit history. It is an on-going record of the potential and known contamination risks before a permit is granted, whilst activities are carried out under a permit and at the time of surrounding the permit.

The SCR will be submitted as required for Form B2/C2, Question 5b and will be completed following the Environment Agency's Environmental permitting: H5 Site condition report guidance (2013)¹. The template structure is directly from the Environment Agency's H5 Site Condition Report word template.

For all new permits **sections 1 to 3** will be completed.

For sites that are currently permitted **section 1 to 7** will be completed, updating sections from the previous Site Condition Report where available.

Section 8 to 10 are not to be edited; these address surrender of the permit at a later date.

¹ <https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report>

1.0 SITE DETAILS	
Name of the applicant	Dwr Cymru Welsh Water
Activity address	Afan Water Treatment Works, Phoenix Wharf, The Docks, Port Talbot SA13 1RA
National grid reference	SS 76061 87329

Document reference and dates for Site Condition Report at permit application and surrender	Site Condition Report: 100123523_SCR_AFA Date of Permit Application: TBC Date of Surrender: TBC
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Document references for site plans (including location and boundaries)	See Appendix A for relevant plans and figures. 100123523-MMD-00-XX-DR-Y-0001
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2.0 Condition of the land at permit issue	
Environmental setting including: • geology • hydrogeology • surface waters	<u>Land use</u> The site is located approximately 2.5km south of Port Talbot. It is currently the Sludge treatment Centre (STC), hereby referred to as the Site, in the southern of the Afan Wastewater Treatment Works (WwTW), which has occupied the land since at least 2001. The WwTW lies within a heavily industrialised area. To the west lies the Port Talbot harbour and the Bristol Channel, which is also present south of the site. The remainder of the site's surroundings predominantly comprises industry including a steelworks. The proposed permit boundary covers the southern part of the WwTW site, as shown on drawing 100123423-MMD-00-XX-DR-Y-0001 which accompanies the application, and is also presented in Appendix A-2. <u>Geology</u> <u>Artificial Geology</u> The site, including the proposed permit boundary, is located in an area of 'Landscaped Ground' which refers to the area of reclaimed land. Although no 'Made Ground' is indicated underlying the Site, it is likely that some is present as a result of the development activities on Site. <u>Superficial Geology</u> The Site, including the proposed permit boundary, lies upon an area of Blown Sand, comprising sand. These superficial deposits formed up to 2.6 million years ago in the Quaternary Period. Immediately to the east of the site are Tidal

Flat Deposits, and adjacent to the west are Marine Beach Deposits. The borehole information for an area just south-west of the site shows the sand to be 10 -15m thick.

The sand is underlain at depths of about 10m by an alluvial sequence of interbedded sand, sandy silt and organic silty clay, including a thin layer of peat. The published map confirms the alluvium to be present within the former tidal mouth of the River Afan.

Bedrock Geology

The Site, including the proposed permit boundary, lies upon the South Wales Middle Coal Measures Formation and further underlain by the South Wales Lower Coal Measures Formation, which both comprise mudstone, siltstone and sandstone. These sedimentary bedrocks formed approximately 299 to 359 million years ago in the Carboniferous Period. The strata dip approximately 14-15° in a northerly direction. The conjectural outcrop of the 2' 9" coal seam lies approximately 200 metres north of the site. According to the generalised vertical section, the 6-feet coal seam could lay some 80 metres beneath the study area. The strata beneath the site form part of a synclinal structure and are also displaced by associated major and minor faults. The conjectural position of one such fault, the "Giant's Grave Fault", is shown some 400 metres east of the site. No faults are shown affecting the site itself.

BGS Boreholes

Five BGS boreholes are recorded within 250m of the Site. These identify superficial deposits (variably comprising sand, gravel, clay and silt) to a minimum of 25.5m below ground level (bgl). Boreholes approximately 1km away record bedrock between 23-26m bgl.

Hydrogeology

The Blown Sands superficial aquifer underlying the Site is designated as a Secondary A aquifer. The Marine Beach Deposits are classified as a Secondary Undifferentiated aquifer.

The South Wales Middle Coal Measures formation is designated as a Secondary A aquifer.

The north of the wider WwTW site lies within an area of groundwater flooding capability with potential flooding at the surface. Directly north of the WwTW site there is potential for flooding of property situated below ground level. There are no areas of the proposed permit boundary indicated as being affected by groundwater flooding.

Hydrology and flooding

The beach associated with the Bristol Channel is located adjacent to the south-western corner of the proposed permit boundary, with a tidal mark seen approximately 40m from the Site boundary. The outline of a pond is also seen approximately 40m to the north-east of the wider WwTW site, although this is noted to be dry on recent aerial photography.

The current Natural Wales flood map shows the Site, including the proposed permit boundary, is at very low risk of flooding from rivers and local watercourses with less than 0.1% chance of flooding each year.

	<u>Sensitive land use</u> The site does not fall with a nitrate vulnerable zone or within 500m of a Special Scientific Interest (SSSI).
Pollution history including: • 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	<u>Pollution incidents to controlled waters</u> There have been no pollution incidents to controlled waters on the Site. Within 250m, there has been one minor pollution incident associated with paints/dyes released in effluent from the pumping station to the sea in 1998 (63m west of the proposed permit boundary) and one further significant pollution incident 500m to 1km from the site (849m south-east of the proposed permit boundary) involving farm slurry release (receiving water not specified). <u>Nearby industrial land uses</u> There are no active Contemporary Trade Directories within 250m of the Site. There are 12 further points of interest within 250m of the Site; two sludge ponds 76m and 248m north east, three outfalls 85m, 87m and 104m south west, three works 150 – 221m east and four tanks 22 – 227m away. <u>Recorded Landfill and Historic Landfill</u> There are no BGS recorded or historical landfill sites within 250m of the Site area. <u>Registered Waste Treatment or Disposal Sites</u> There is a licenced waste management facilities on the Site with another located approximately 30m north. Both facilities are registered to Welsh Water associated with a landfill gas engine (<3 mW). <u>Discharge Consents</u> There are three discharge consents registered within 250m of the Site, all issued to Welsh Water for sewage discharge (final / treated effluent), into controlled sea approximately 240m to the west of the Site. All three consents were issued and revoked on 1st December 2000. <u>Integrated Pollution Prevention and Controls</u> There are two integrated pollution prevention and control records found approximately 30m north of the Site. Both records are licenced to Welsh Water. The first was awarded on 26th May 2010 for combustion; recover oil (≥ 3 Mw but <50 Mw) and superseded by variation on 27th March 2013 for an associated process. No entries are found within the Site footprint. <u>Mining and quarrying</u> The wider WwTW site is located in a coal mining area with possible mining instability on the Site. Significant mining activities are present in the area associated with the steel works. <u>Chemical storage & use</u>

Historically, any chemicals or fuels stored or used may potentially have leaked or been spilled. Such chemicals associated with activities on the WwTW may include aluminium sulphate, ferric chloride or sulphate, lime, insecticides and herbicides. Herbicides and pesticides may have been used to control vermin and weed growth across the site. However there is no evidence of any spillages occurring within the Site.

Leaking or overflowing tanks

It is potentially possible that some of the tanks present on the WwTW site have leaked in the past and it is possible that, especially in times of heavy rainfall that, the tanks have overflowed onto the surrounding land. However there is no evidence of any leakages occurring within the proposed permit boundary.

Burial

Waste materials such as sludge or screenings may have been historically buried on or near the Site. Burial of material is likely to have taken place in discrete 'hotspots'. It is unlikely that any burial areas were lined or capped. The nature of the material will determine leachate concentration and volume, whether its readily biodegradable and the potential for gas generation and accumulation. Other than the land reclamation, there is no evidence of burial of material within the proposed permit boundary.

Historical Land use

- Earliest historic mapping from 1885 indicates that the whole WwTW site lies within an area of beach between the high and low water marks. A volunteer rifle range lies approximately 600m north of the Site and the Old River flows north east to south west approximately 100m south east of the Site.
- Railway lines are present 450m northwest of the Site in 1900 constituting the Docks Branch of the Port Talbot Railway, on land that has been raised/reclaimed since previous mapping, likely through tipping. The Old River has changed course, now located directly east of the site (and proposed permit boundary) but reaching the Bristol Channel further south, and the previous channel has been infilled.
- By 1921 the railway lines have been extended to within 350m of the Site.
- In the 1965 mapping, the entirety of the Site is above the high water line. Much of the surrounding industry (steel works) has been constructed to the east of the site and the railway network greatly expanded. The Old River is no longer present.
- By 1971 the Port Talbot Deep Water Harbour was constructed.
- In 1982, further expansion of the industrial area has occurred including travelling cranes and conveyors. A substantial sludge pond is present approximately 70m northeast of the Site in the area of the former river course.
- By 1993, a pumping station to the northwest of the Site was constructed, however the Site remains undeveloped on mapping through to 1999. Aerial photography from 2001 shows the site in a similar layout to the present day, with the exception of the digester tanks.
- The WwTW site area was first mapped to be developed in 2006, indicative of the present area layout. Aerial imagery indicates that the plot to the

	south of the Site has been used to store and/or dispose of vehicles and industrial materials. <u>Contaminants of concern</u> The following contaminants are considered to be 'relevant hazardous substances', as defined in Article 3(18) of the IED and Article 3 of Regulation (EC) 1272/2008. • total petroleum hydrocarbons (TPH); • polycyclic aromatic hydrocarbons (PAH); • heavy metals and inorganics; • pathogens; • asbestos; • polychlorinated biphenyls (PCBs); • chlorinated solvents and phenols; and • volatile and semi-volatile organic compounds (VOC/SVOC). There may also be ground gases present, likely comprising carbon dioxide (CO₂) and methane (CH₄). Although there is the potential for contamination of soils and groundwater as a result of the operation of the WwTW site, significant mitigation measures are already in place, including; bunding, maintenance of infrastructure, environmental management systems etc which reduce the risks of contamination occurring to very low. The Environmental Risk Assessment report includes the potential risk to receptors from the use, production and release of relevant harmful substances from operational activities at the WwTW. No further risk assessment for the release of contaminants to the environment are therefore considered to be needed beyond the Environmental Risk Assessment for the application.
Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	<u>Site walkover</u> A recent site visit for the Site has not been conducted. A site reconnaissance in 2009 by Arup associated with the application for the CHP permit indicated no evidence of visual or olfactory contamination on site. <u>Site data</u> No pollution incidents have been recorded on site to date and the majority of site operations are enclosed. No monitoring or assessment results are available. Cracks in pavement may lead to leachable contaminants being present in the subsurface, but this has not been confirmed. <u>Site investigation 2008, Arup</u> A geotechnical and geo-environmental investigation was undertaken in 2008 to support the constructing the advanced sludge treatment facility within the Site. Fieldwork comprised four trial pits to a maximum of 3.8m bgl, and six boreholes to a maximum of 43m bgl. Five groundwater monitoring installations were installed in the Blown Sands (4 no.) and Fluvio-glacial gravels (1 no.). A plan of the investigation locations is presented in Appendix A.2. Samples were collected and analysed for pH, metals, asbestos, boron, sulphides, phenol index, BTEX

	(benzene, toluene, ethylbenzene and xylene), polycyclic aromatic hydrocarbons (PAH), polychlorinated biphenyls (PCBs), total petroleum hydrocarbons (TPH), cyanides, sulphides and boron. The investigation identified: • Made ground – 1.3m-4.5m thick (average 2.4m) • Blown Sand – 13.3m-15.9m thick (average 14.8m) • Estuarine Alluvium – 7.7m-9.1m thick (average 8.3m) • Fluvio-glacial deposits – 4.1m-7.4m (average 5.3m) • Coal Measures – thickness not proven. Monitoring of the boreholes was reported to confirm a water table in the blown sand to elevations of 4.4mOD to 4.9mOD, and in the fluvio-glacial deposits to elevation of 2.9mOD. Due to the proximity of the site to the sea, some tidal variation may be seen. During the investigation works, a black 'coal tar' type material was encountered in TP2 (1.6-1.65m bgl in the made ground) with associated strong hydrocarbon odour, and further black staining of soil with a strong hydrocarbon odour was encountered in BH3 (1.5-4.5m bgl in the made ground). In TP3, a soft brown organic sludge (considered a by-product of the WwTW) was recorded from ground level to 0.5m depth. Borehole logs and geo-environmental results of the investigation are presented in Appendix B Soil sample analysis recorded a maximum total TPH concentration of 147,000mg/kg, a maximum PAH concentration of 178.4mg/kg and a maximum sulphide concentration of 99.4mg/kg, all from the sample of 'coal tar' in TP2. In other locations, PAH were often detectable at low concentrations and TPH was present in variable concentrations up to 20,400mg/kg. Leachate tests on four near-surface samples of made ground from BHs 1, 3, 4 and 5 recorded all contaminant concentrations were below the relevant chemical standards with the exception of pH, copper, molybdenum, antimony and phenol. Four samples of groundwater collected during the construction of the boreholes (which may therefore not be fully representative of the groundwater quality due to increased turbulence and suspended solids). From these, two of the samples recorded a number of contaminants were above the screening criteria, including; nickel, chromium, lead, zinc, arsenic, unionised ammonia, phenol and TPH. This data indicates that the site is impacted from widespread contamination in the area associated with the nearby metal works, and the reclamation of the land on which the WwTW is located, but also has areas of localised contamination. <u>Planning applications</u> A search of the Neath Port Talbot District Council planning portal was conducted in August 2024. No applications with relevant information on ground conditions were discovered.
Baseline soil and groundwater reference data	Reference data from the 2008 investigation of the Site, prior to the construction of the sludge treatment facility, is provided in Appendix B.

	It is not considered necessary to undertake additional geo-environmental samples to establish baseline conditions, as the Site is underlain by artificial/reclaimed ground. Existing ground impacts are likely a result of the presence and operation of the WwTW and surrounding industrial land uses. Whilst the Environmental Risk Assessment has identified potential hazards to the environment from the identified contaminants of concern associated with the operation of the current Site, existing contamination has been identified on-site which is likely to have resulted from the reclamation of land, upon which the WwTW is located, industrial land uses in the surrounding area, and from operational activities at the site itself.
Supporting information	Sources used in the production of this SCR: • Landmark (2021), Envirocheck Report – Afan Water Treatment, ref: 284099786_1_1; • Arup (2008), Afan Advanced Digestion Project - Geotechnical Desk Study, ref: 207361-00; • Soil Mechanics (2009), 2U Afan Advanced Digestion Scheme – Factual report on a ground investigation, ref: H8118; • Arup (2009), Afan Advanced Digestion Project - Geotechnical Interpretive Report, ref: 207381; • British Geological Survey, GeoIndex www.bgs.ac.uk consulted August 2021; • British Geological Survey, Borehole Scans www.bgs.ac.uk consulted August 2024; and • Magic Map http://magic.gov.uk/ consulted August 2024.

3.0 Permitted activities	
Overview of site processes	Imported sludge cake is delivered to the site by road and is received into the cake import centre, which comprises 2 No. enclosed hoppers, both of which are extracted to Odour Control System 1 (OCU1). The imported cake is then transferred to the Thermal Hydrolysis Plant (THP) feed silo where it combines with indigenous sludge cake previously held within the indigenous sludge cake silo. Both the indigenous and THP feed silos are also extracted to OCU1. The mixed sludge cake within the THP feed silo is then conveyed through the THP, which is a sealed process consisting of a pulper, 4 no. reactor tanks and a flash tank. After thermal hydrolysis, the sludge is pumped into 2 No. anaerobic digestors and digested for a period of 10 to 14 days. The digested sludge is then pumped to an open aerated digested sludge holding tank prior to dewatering. Dewatering is provided by 4 No. belt presses housed within the post THP belt press building, and the resultant dewatered sludge cake is discharged into 4 No. cake bays prior to transfer to the main cake pad. The cake is then periodically exported off site by road trailer. Each of the belt presses and the

	cake bays are extracted to OCU2. The cake storage pad is also fitted with a roof. Biogas generated from the wet Anaerobic Digestion process is stored in 2 No. dual membrane gas storage bags. The biogas is then transferred to the Combined Heat and Power (CHP) Engines where it is combusted in 2 No. spark ignition engines with a rated thermal input of 3.745 MWth each. The CHP engines are used to generate electricity via an alternator and heat via the engine exhaust and cooling jacket. Electricity produced is used by the WwTW with any surplus transferred to the distribution network. High grade heat is recovered from the CHP engine exhaust and used to generate low pressure steam, whilst low grade heat from the cooling jacket is used to generate hot water for reuse in the Advanced Digestion process. Additional heat demand is met by 2 No. supplementary fired waste heat boilers (3.9 MWth each). The biogas is treated prior to combustion by a dedicated Siloxane removal unit which regenerates daily for 4 No. hours starting at midnight. Emissions from the filter are discharged via a stack. A high temperature waste gas burner is also available to flare off excess biogas.
Permitted activities	Within the site boundary, a Combined Heat and Power Facility operates under permit EPR/ZP3032KQ (last varied in 2018, V004) for the following activities: • S1.1, A(1)(b)(iii) – Burning waste as a fuel in an appliance with a rated thermal input of 3MW or more but less than 50MW • Operation of a biogas flare • Storage and handling of wastes, including waste oils • Biogas storage • Surface water drainage • Boiler water treatment and conditioning The other existing STC activities and infrastructure on site are not currently permitted and will be added as part of the variation to the waste operation permit EPR/ZP3032KQ.
Non-permitted activities undertaken	Waste activities comprising imports, physio-chemical and anaerobic digestion treatment and waste storage are currently non-permitted activities on site. Anaerobic digestion is to be permitted under the Industrial Emissions Directive under a Bespoke Installation Permit as Anaerobic Digestion is no longer operational under T21 exemptions. Permitted Directly Associated Activities include waste import, physio-chemical treatment of sludges and storage of indigenous and imported sludges.
Document references for: • plan showing activity layout; and	• EA (2010), Permit with introductory note – EPR-ZP3032KQ • Ove Arup & Partners Ltd (2009) Afan Wastewater Treatment Works: Site Condition Report. Ref: 207381-10 • NRW (2018), Notice of variation with introductory note – EPR/ZP3032KQ/V004 • 100123523-MMD-00-XX-DR-Y-0001

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| <ul style="list-style-type: none"> • environmental risk assessment. | |
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Note:

In Part B of the application form you must tell us about the activities that you will undertake at the site. You must also give us an environmental risk assessment. This risk assessment must be based on our guidance (*Environmental Risk Assessment - EPR H1*) or use an equivalent approach.

It is essential that you identify in your environmental risk assessment all the substances used and produced that could pollute the soil or groundwater if there were an accident, or if measures to protect land fail.

These include substances that would be classified as 'dangerous' under the Control of Major Accident Hazards (COMAH) regulations and also raw materials, fuels, intermediates, products, wastes and effluents.

If your submitted environmental risk assessment does not adequately address the risks to soil and groundwater we may need to request further information from you or even refuse your permit application.

4.0 Changes to the activity	
Have there been any changes to the activity boundary?	No
Have there been any changes to the permitted activities?	Due to impending changes in the way the Waste Management industry is regulated by the Environment Agency and Natural Resources Wales, STCs are obliged to apply for Fixed Installation Permits under the Industrial Emissions Directive (IED) and comply with new permit conditions by August 2022. Fixed Installation Permits will amalgamate and supersede all current permits and exemptions under which waste is treated on the STC sites (including Environmental Permitting Regime (EPR), Medium Combustion Plant Directive (MCPD), old style Waste Management Licenses, and T21 exemptions). Activities at Afan WwTW will continue, as prior to the introduction of the updated and amalgamated permit, although under any new requirements imposed by the permit.
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	A prior site condition report (SCR) was produced for the site in 2009 as part of the application for the permit for the CHP. This SCR presents the condition of the site at the point of the amalgamation of the existing permits on site and the introduction of additional requirements relating to sludge processing, as required under the IED. 'Dangerous substances' that are used or produced at the site include: ● Diesel ● Antifoam ● Polymer ● Grease/lubrication oils ● Methane (produced from the digestors and stored in the on-site double membrane gas holder); Although there is the potential for contamination of soils and groundwater as a result of the operation of the site, significant mitigation measures are already in place, including; bunding, maintenance of infrastructure, environmental management systems etc which reduce the risks of contamination occurring to very low. The Environmental Risk Assessment report includes the potential risk to receptors from the use, production and release of relevant harmful substances from operational activities at the WwTW. No further risk assessment for the release of contaminants to the environment are therefore considered to be needed beyond the Environmental Risk Assessment for the application.
Checklist of supporting information	● Ove Arup & Partners Ltd (2009) Afan Wastewater Treatment Works: Site Condition Report. Ref: 207381-10

5.0 Measures taken to protect land	
Use records that you collected during the life of the permit to summarise whether pollution prevention measures worked. If you can't, you need to collect land and/or groundwater data to assess whether the land has deteriorated.	
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	
Summarise any pollution incidents that may have damaged the land. Describe how you investigated and remedied each one. If you can't, you need to collect land and /or groundwater reference data to assess whether the land has deteriorated while you've been there.	
Checklist of supporting information	• Records of pollution incidents that may have impacted on land • Records of their investigation and remediation

7.0 Soil gas and water quality monitoring (where undertaken)	
Provide details of any soil gas and/or water monitoring you did. Include a summary of the findings. Say whether it shows that the land deteriorated as a result of the permitted activities. If it did, outline how you investigated and remedied this.	
Checklist of supporting information	• Description of soil gas and/or water monitoring undertaken • Monitoring results (including graphs)

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	• Site closure plan • List of potential sources of pollution risk • Investigation and remediation reports (where relevant)

9.0 Reference data and remediation (where relevant)	
Say whether you had to collect land and/or groundwater data. Or say that you didn't need to because the information from sections 3, 4, 5 and 6 of the Surrender Site Condition Report shows that the land has not deteriorated. If you did collect land and/or groundwater reference data, summarise what this entailed, and what your data found. Say whether the data shows that the condition of the land has deteriorated, or whether the land at the site is in a "satisfactory state". If it isn't, summarise what you did to remedy this. Confirm that the land is now in a "satisfactory state" at surrender.	
Checklist of supporting information	• 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)

10.0 Statement of site condition
Using the information from sections 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.

A. Plans and figures

Figure A-1: Ground investigation locations

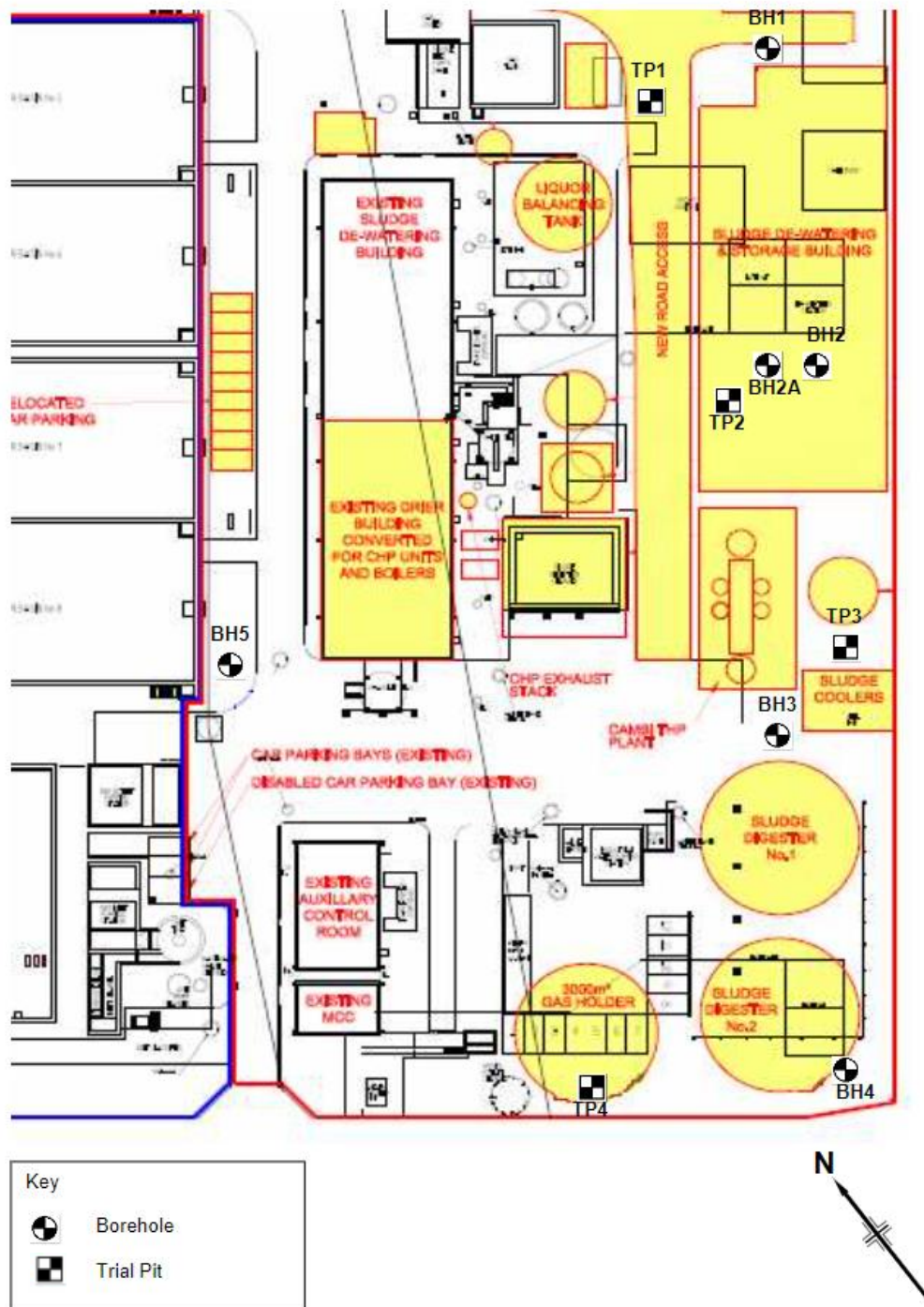


Figure A-2: Site Layout Plan



B. Baseline Site Data

See document reference 100123523_SCR_AppB_GI_Logs_AFA and 100123523_SCR_AppB_GI_Results_AFA

C. Landmark Envirocheck Report