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Wolfmet Environmental Permit (EPR/BP3930JC) – Site Surrender Report

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Executive Summary

This document represents the Wolfmet Site Surrender Report (WSR) for the full surrender of M&I Materials Ltd (M&I) Wolfmet Plant installation at Hibernia Way, Trafford Park, Stretford, Manchester M32 0ZD. This document is submitted to the Environment Agency in support of the application to surrender Permit No. BP3930JC under 2.2 Part A (1) (a) of the Environmental Permitting (England & Wales) Regulations 2016 (as amended) (the 'EPR' Regulations) to the extent authorised by the permit. At the site, the obligated process covered is the manufacturing activities involving the Wolfmet product, which falls under 2.2 Part A (1) (a) Non-ferrous metals, is a powder metallurgy process. Specifically, this involves the mixing of precise amounts of raw material in the form of tungsten and other secondary alloying powders to produce a homogeneous blend and applying exacting temperatures at different stages to create specific alloys. The process can be broken down to:

- Powder mixing
- Pressing
- Forming
- Sintering
- Machining
- Storage of raw materials and wastes
- Quality control

Following decommissioning, the Wolfmet Plant has been relocated to a new M&I facility. A permit has been issued for the operation of the newly located plant, reference: EPR/PP3624LU.

The entire site infrastructure (permanent site structures) and grounds are under the ownership of Shell Midel. The "Installation" which was defined in the original permit application as being the part of the site, which refers to the process currently permitted under the EPR Regulations permit BP3930JC, is on lease to M&I from Shell Midel until the end of June 2026. The permitted Wolfmet area remains within the management control of M&I until the end of the lease period. This report describes how the necessary measures have been taken to avoid a pollution risk resulting from the operation and decommissioning of the regulated manufacturing facility.

M&I demonstrate that, due to the effective measures employed, land and groundwater have been adequately protected and have not deteriorated due to the operations carried out during the lifetime of the permit and all areas subject to the surrender are therefore judged to be in a satisfactory state. These measures were employed for the operation of the installation as a Low Impact activity.

The decommissioning of the Wolfmet Plant was subject to the Site Closure Plan (SCP) which can be seen in Appendix 1. The SCP presents how the identification of the pollution risks associated with the decommissioning and relocation of the Wolfmet Plant was managed through decommissioning. The plan covers the preliminary actions undertaken to facilitate a phased shut down, removal of processing equipment and control philosophy for managing pollution risk which are consistent with measures being considered for the final decommissioning works ahead of the permit surrender.

This report includes the Site Condition Summary and the Statement of Satisfactory State, incorporating descriptions of the infrastructure monitoring that has been undertaken on the site in accordance with the operator's Environmental Management System (EMS) as prescribed by the permit.

For the purpose of the surrender, it is considered that the installation meets the requirements of a 'low risk' surrender and a satisfactory state for permit surrender following decommissioning subject to the SCP.

1 Introduction

EHS Projects Ltd has prepared this Site Surrender Report on behalf of M&I Materials (M&I) for their Wolfmet Plant installation at Trafford. The extent of the physical area subject to the surrender is outlined in Figure 1 below.

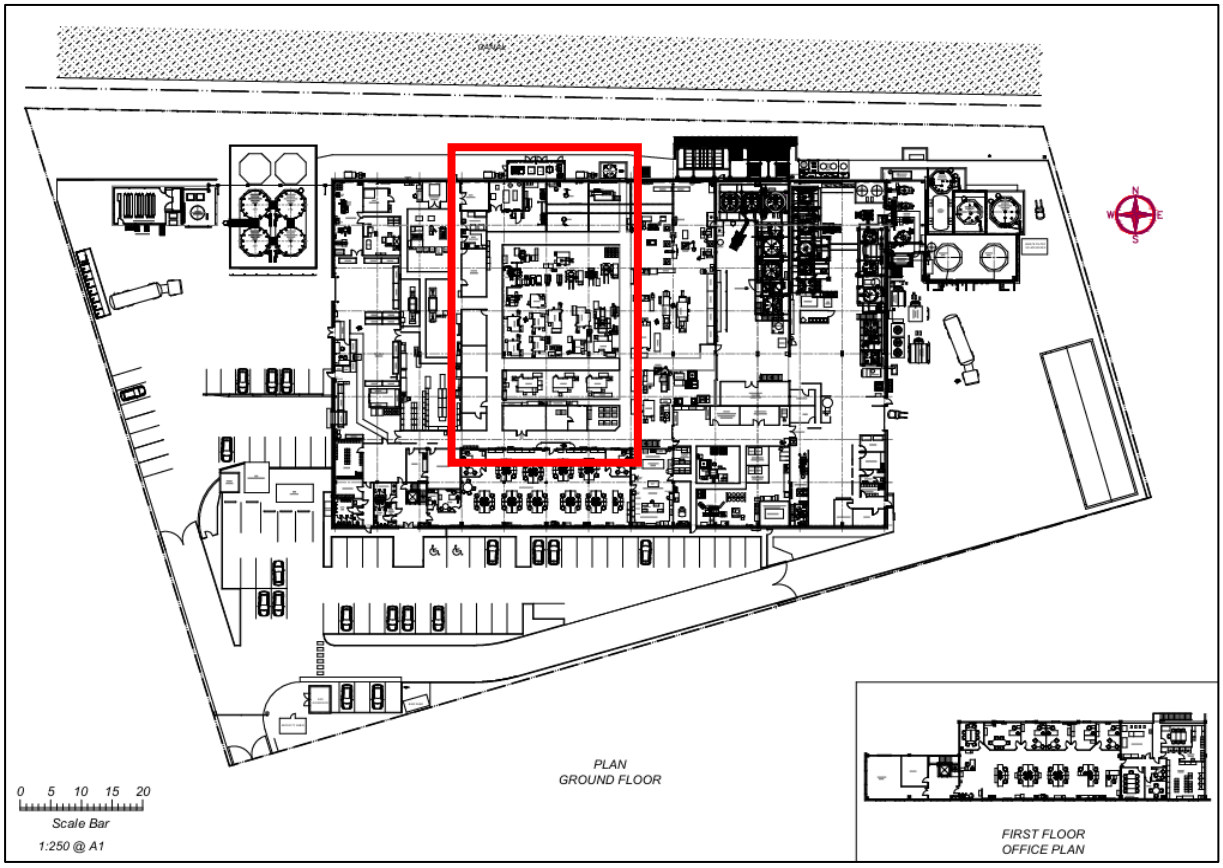

Figure 1: Current Permit Boundary, areas within the red outline are to be surrendered.

The entire site infrastructure (permanent site structures) and grounds are under the ownership of Shell Midel. The "Installation" which was defined in the original permit application as being the part of the site, which refers to the process currently permitted under the EPR Regulations permit BP3930JC, is on lease to M&I from Shell Midel until the end of June 2026, the permitted Wolfmet area remains within the management control of M&I until the end of the lease period.

The installation was first permitted in 2018 as a Low Impact Installation meaning that it is accepted by the EA that the activity intrinsically has only a low environmental impact. At no point has the activity ceased operation and has been subject to regular inspection by the local EA officer. Annually the operator reconfirms the low impact status of the activity which continues to conform with the statements required under the Low Impact Installation criteria specified by the Environment Agency.

During the operation of the regulated installation, M&I have maintained an Environmental Management System (EMS) covering all activities at the entire site. The EMS has been certified to ISO 14001 since 2009. Throughout the lifetime of the permit there has been no reportable incidents internally or externally to the regulator and no enforcement action taken.

Through the operation of the installation M&I has committed to the premise that site activities for the installation would be planned and implemented to minimise the potential for environmental impact. This is through control of potential pollution, including from materials, surface water, dust, odour, noise and waste. As part of routine operations, the site has implemented appropriate measures to avoid any pollution risk in accordance with the findings of the original site condition report. These operating management techniques are aimed to specifically ensure infrastructure inspection and effective operation control of the process is undertaken to demonstrate that no deterioration of ground/groundwater condition has occurred.

2 Site Details

The Wolfmet manufacturing area is located within M&I Materials' Hibernia Way facility adjacent to the Midel plant, as shown in Figure 1. The area is divided into a number of smaller zones where the various manufacturing, packaging and warehousing operations are carried out by skilled operators with extensive direct experience of the plant.

The manufacturing process was a powder metallurgy process which involved the mixing of precise amounts of raw material in the form of tungsten and other secondary alloying powders to produce a homogeneous blend and applying exacting temperatures at different stages to create specific alloys

The wider site comprises of an EPR activity (regulated separately) of the manufacture of synthetic esters. These are self-contained discrete production units contained within the main building unit. This process is completely unconnected with the Wolfmet process.

The site is accessed via Hibernia Way and comprises a single main building with other facilities including external storage areas in addition to office space, and adjacent car parking. The Site has an average elevation of approximately 26m above Ordnance Datum (aOD). Topographically the Site is relatively flat. The Site is located within an area of mixed industrial and commercial. Land uses in the immediate vicinity include the following principal features:

Direction	Land Use
North	The Site is bound to the north and northeast by the Bridgewater Canal with industrial and commercial developments beyond.
East	The Site is bound to the east and southeast by several industrial and commercial developments including a distribution warehouse and offices.
South	The Site is bound to the south by a commercial storage unit and offices with a road (Brightgate Way) which provides access to the surrounding trading estate.
West	The Site is bound to the west by a manufacturing unit with further industrial and commercial land beyond.

Figure 2: Site setting

The external surfaces of the Site, yard areas and internal roadways are all concrete hardstanding are in a good state of general repair. All materials including waste are located on areas of high integrity concrete.

The Site is serviced by a manned 24-hour security and is fully enclosed by a chain and link perimeter fence. The roadways and perimeter are covered by CCTV cameras. There is no history of unauthorised access or historical records of any pollution incident.

2.1 Above Ground Storage Tanks (AST)

All materials storage associated with the Wolfmet process is internal to the main building unit. Most of the materials utilised are powders (tungsten and other secondary alloys), these are stored appropriately in barrels and drums until needed for manufacture. Alongside the powders, there are small volumes of hydraulic oil, compressor oil, metal working fluids and alkaline based detergents. These are all stored internally within drums and barrels.

Regular checks and inspections were made at the Site which includes inspections of the plant operations and infrastructure (tanks and pipework) associated with storage of substances.

2.2 Raw Materials and Product Storage

The operation at the installation is associated with the delivery, storage, handling and use of various substances (Materials Inventory - Appendix 2). All materials are stored internally on areas of hardstanding high integrity concrete.

Regular checks are made, which comprises visual inspections of storage facilities and bunds at the Site.

2.3 Waste Management

All waste materials generated by the installation were transferred to an externally located self-bunded metal lockable drum storage unit. The yard in the vicinity of the container is hard standing served by the combined surface water and foul drains that discharge to public sewer after the interceptor.

2.4 Site Drainage Layout

The site holds a detailed drainage layout plan which shows the as-built drainage layout from when the site was developed in 2001. The drainage arrangements were newly constructed when the site was developed.

The drainage layout includes foul and surface water drains which all run to a common combined drainage point at the front of the site by the gatehouse. A Decathlon III Drainage System is also in place on three sides of the building including both yard areas and the front of the building which consists of a drainage run with a slotted surface which captures all surface run-off and feeds into the main drainage system prior to the final release point. The approximate capacity of the decathlon drainage runs is 14m^3 in the drains alongside the Midel yard and along the front of the building (approximately 112 metre drainage run with equivalent pipe diameter of 400mm), and an additional 3m^3 along the yard on the opposite side of the building (approximately 60 metre drainage run with equivalent pipe diameter of 250 mm). An Envirovalve is in place prior to the final release point to the drains on Hibernia Way which can be operated from the gatehouse to prevent effluent or spills leaving site if required. In addition, an interceptor is in place prior to the final release point with a capacity of 5.03m^3. There is a rain capture tank in place beneath the car park to the front of the building, which provides attenuation in the event of heavy rainfall, which captures surface water run-off from the roof drains, this provides 130m^3 of capacity.

The entire site is curbed except at the entrance to the site by the security gatehouse.

3 Condition of the Land at Permit Issue

The environmental setting of the installation and condition of the land at permit issue was described within the original Site Condition Report (SCR) dated November 2017 (Appendix 3) which was completed to support the permit application at that time.

The SCR shows that the site was first developed in 1976 as a number of isolated buildings in the area, before this it was primarily undeveloped although some large industrial works (Dye works, Steel works and engineering works) were developed within 500m of the site's footprint. The land was then built into its current form and developments infilled the wider industrial estate from 1991, since then there has been no significant change to the land use.

The original SCR concluded that there was little possibility of ongoing contamination, pollution or leaks to land to occur during the future life of the installation and no remedial or environmental monitoring was required. The operating techniques, including planned preventative management and maintenance systems, have continued to be in place and are judged to be appropriate in mitigating against the possible future impact of leaks / spillage upon the ground. These include but are not limited to the following:

- Daily site/services engineering inspection of area including processing equipment, tanks and associated pipe work – actions recorded on Shire electronic maintenance system and closed out.
- Monthly site inspection by SHE personnel of all internal and external areas including housekeeping, infrastructure including secondary and tertiary hardstanding (example completed forms can be reviewed in Appendix 4) – observations reported within SHE management systems action tracker.

These control measures are deemed suitably robust to minimise the potential for pollution from the installation and were further verified by periodic audits. This included but was not limited to:

- Compliance Assessment Inspections by EA (see Appendix 5).
- 6 monthly surveillance and 3 yearly re-certification audits of ISO 14001 EMS by certification body.
- Annual compliance audits undertaken by specialist third party.

Whilst quantitative data is not available to allow comparison with baseline condition, due to the lack of evidence of there being any pollution incident or loss of containment, the condition of the land is justified to be in the same state as when the permit was issued for the purpose.

4 Measures Taken to Protect the Land

4.1 Environmental Considerations During Facility Operation

The specific environmental implications of the site's previous activities have been determined from assessments reported as part of the original permit application. As part of the operation of the site a formal management system was put in place with additional measures to control significant environmental aspects, which could lead to pollution incidents from the permitted activities. Measures used to protect land are included within the site's EMS. The operation of the EMS to ISO 14001 certification lead to the implementation of further internal control measures to protect the land. The key issues of relevance to the permit and installation are summarised as:

- Chemical storage and handling activities only took place in areas that have an impervious concrete floor and provide for primary, secondary and tertiary containment measures against loss to land or water;
- An inspection and maintenance program was put in place to cover the concrete raft making up the floor of the areas within the installation (internal and external) and was operated during the permitted period;
- Tank integrity, damage to plant, corrosion to steelwork and associated works and bunded areas were inspected to a schedule as part of the site services maintenance system;
- Inspection schedules required examination of all individual concrete rafts for general surface condition, cracks, holes / depressions and were carried out to a monthly schedule;
- All materials delivered to site have been subject to supervision during offloading activities.
- In order to permit efficient maintenance of the process equipment each item of plant was serviceable. To ensure proper operation and maintenance of the process equipment, M&I complied (at a minimum) with the equipment manufacturers recommended operation and maintenance procedures.

4.2 Environmental Considerations During Decommissioning

See Site Closure Plan, Appendix 1.

4.3 Formal Management Systems

Throughout the period of operations under the permit, the site has operated formal environmental and asset protection management systems to ensure ongoing management, maintenance and improvement of environmental controls. Various documented and undocumented procedures were developed and implemented to ensure effective operational control of environmental interactions, including planned preventative maintenance, inspection, and testing of critical infrastructure. M&I have maintained, and regularly reviewed, the formal ISO 14001:2015 management system certification since 2009.

The company operates an EHS Reporting System to encourage all staff to report any potential environmental risks around the site through the non-conformance/incident reporting forms, corrective and preventative action. The purpose of these procedures was to ensure that identified hazards relating to health, safety and environmental concerns are reported, recorded and investigated in a consistent, systematic manner in compliance with their health, safety and environmental requirements. The

procedures identified any potential non-conformances and detailed such preventive actions as were necessary to mitigate any consequences arising from such observations.

4.4 Materials Handling and Bulk Storage Infrastructure

The Wolfmet process does not involve any use if liquids directly in the process. Powders are stored internally and all deliveries were supervised by trained staff. Engineering and site services will have utilised engineering consumables such as lubricating oils, coolants, aerosols and domestic cleaning chemicals as part of the general plant management. These materials were stored on bunds in an internal area in which there is no floor level drainage and floor hardstanding is of good condition throughout the area as well as being subject to regular inspections.

4.5 Planned, Preventative Maintenance Programme

During the lifetime of the permit, M&I operated a formal planned, preventative maintenance program. Of specific relevance to the environment, in summary these control measures consisted of:

- inspection of all storage areas, bunds etc for spillages or leaks by an operator;
- periodic inspection was conducted investigating visual integrity of the tanks and bunds including checks on valves, pumps etc.

Inspections look for issues such as general damage to equipment, leaks, loose fittings or connections, excessive heat or noise emissions levels. As a result of these inspections any maintenance or improvements were then carried out by an in-house maintenance team backed up by external contractors as required.

None of the inspection records record any incidents that could have released polluting materials to ground or groundwater. All records where observations were made can be categorised as minor issues that were dealt with as part of the routine operational procedures for site management e.g. noting a small spillage in bund requiring checking and appropriate disposal.

The management system's checks and balances operated from the date of first permit issue to date show that there are no records of incidents that could have resulted in environmental impacts such as pollution of ground or groundwater.

5 Pollution Incidents That May Have Had an Impact on Land.

There have been no Schedule 5 notifiable incidents throughout the operation of the permit or reported within the EMS beyond minor spillages, these were categorised as minor issues that were dealt with as part of the routine operational procedures by site management. These posed no pollution risk and were not reported to the regulator.

During the lifetime of the permit, it is concluded that there have been no records of pollution incidents that may have damaged the ground or groundwater conditions and there were no reportable pollution incidents that may have impacted on ground or groundwater. Through EA sign off investigation the operator is therefore able to demonstrate that, due to the effective measures employed, land and groundwater have been adequately protected and have not deteriorated due to the operations carried out during the lifetime of the permit and are therefore judged to be in a satisfactory state.

6 Soil Gas and Water Quality Monitoring (Where Undertaken)

No soil gas or water quality monitoring have been undertaken during the lifetime of the permit.

7 Decommissioning and Removal of Pollution Risk

A Site Closure Plan, including the environmental controls exercised in the decommissioning plan is available in Appendix 1.

8 Reference Data and Remediation (Where Relevant)

There are no records of pollution incidents that may have damaged the land or represent actual or potential for further on-going risk. The condition of the land has been justified to be in the same state as when the permit was issued.

9 Statement of Site Condition

During the lifetime of the permit to date there have been no records of pollution incidents that may have damaged the ground or groundwater conditions and there were no reportable pollution incidents that may have impacted on ground or groundwater condition, either during operation or as a result of the change in the layout of the installation. Through EA periodic inspection of the installation and wider regulated site operations and sign off of the annual report the operator is therefore able to demonstrate that, due to the effective measures employed, land and groundwater have been adequately protected and have not deteriorated due to the operations carried out during the lifetime of the permit and are therefore judged to be in a satisfactory state.

For the purpose of supporting the permit surrender the following statement can be made:

'The permitted activities on the proposed surrendered areas have been undertaken in accordance with the existing low impact environmental permit and the operator's management system. The management system sets out the measures to protect the land condition from the permitted activities. It is therefore considered that the proposed surrender area has not been impacted in comparison to the baseline condition.'

10 Updated Environmental Risk Assessment and Conceptual Site Model

The methodology of this risk assessment uses the source-pathway-receptor pollutant linkage to provide a qualitative appraisal of environmental risks and potential liabilities associated with soil and groundwater contamination at the Site.

The conceptual site model (CSM) is prepared based on the current continued use as a materials manufacturer in the production of synthetic esters and specialist engineering materials and the installation of additional bulk storage and transfer line.

Conceptual Site Model: Potential Contaminant Sources (whole installation)

Source	Pathway	Receptor	Risk
On-Site Sources			
Former use as a depot and current use as a materials manufacture (the distillation of	Dermal contact, ingestion and inhalation pathways	Current site users	**Low** The Wolfmet footprint of site is covered in concrete hard standing which is in good condition and would mitigate against contact with potential contaminants in soil

Source	Pathway	Receptor	Risk
petroleum oils and jellies). Storage of various chemicals including drums and above ground storage tanks. Potential presence of Made Ground from previous development of the Site. Potential contaminants such as hydrocarbons.			and groundwater associated with historic contamination. Presence of site hardstanding, containment and operational practices / inspections / maintenance will mitigate potential risk to underlying soils and groundwater from current and proposed permitted operations.
		Neighbouring residents	**Low** Presence of superficial Glaciofluvial Sheet Deposits, Devensian (Secondary A Aquifer) and bedrock Wilmslow Sandstone Formation (Principal Aquifer) may allow for migration of potential contamination off-site. As above, presence of engineered hardstanding and containment will act to limit potential for surface contaminant release to impact underlying soils and groundwater.
	Leaching of contaminants and vertical migration into groundwater	Controlled waters	**Low** Presence of sensitive groundwater bodies underlying the Site (Secondary A Aquifer and Principal Aquifer) may be sensitive to contaminant release at surface. The presence of concrete hardstanding will mitigate potential pathways. It is also understood that regular checks and audits are made at the Site which includes inspections of the plant operations and storage of substances.
Off-Site Sources			
Surrounding historical and current industrial / commercial land uses including dye works, chemical	Dermal contact, ingestion and inhalation pathways	Current site users	**Low** The Wolfmet footprint of Site is covered in concrete hard standing which is in general good condition, which would mitigate against

Source	Pathway	Receptor	Risk
works, steel works, engineering and various depots and warehouses. Potential contaminants such as hydrocarbons.			contact from any potential off-site contaminants.
	Migration via groundwater	Controlled waters	**Low** Presence of sensitive groundwater bodies underlying the Site (Secondary A Aquifer and Principal Aquifer) may be sensitive to contaminant release at surface.
	Leaching of contaminants and infiltration into groundwater	Controlled waters	**Low** Presence of sensitive groundwater bodies underlying the Site (Secondary A Aquifer and Principal Aquifer) may be sensitive to contaminant release at surface.

Appendix 1 – Wolfmet Site Closure Plan

Appendix 2 – Wolfmet Materials Inventory

Appendix 3 – Wolfmet Site Condition Report 2017

Appendix 4 – Example HSE Walkover Check Sheet

Appendix 5 – Example EA Compliance Assessment