



East Region Board Meeting 9 November 2007

Board Report Number: ER 10/07

**Regional Report
July 2007 to October 2007**

- Summary:** This paper contains details of any regulatory and environmental issues, events and other notable activities relevant to SEPA's South East Region.
- Purpose of the report:** For information
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SCOTTISH ENVIRONMENT PROTECTION AGENCY

Regional Report

1. Introduction

- 1.1 This paper is to inform the East Region Board of regional regulatory and environmental issues, events and other notable activities relevant to SEPA's South East Region.
- 1.2 The period of this report is from July 2007 to October 2007.

2. Environmental Regulation Review

2.1 Water

- 2.1.1 **Linlithgow Loch** - Steps are being taken to ensure that Linlithgow Loch remains a local recreational facility. A management group has been set up comprising of SEPA, SNH, West Lothian Council, Historic Scotland, Scottish water and NFU to investigate ways of tackling nutrients in water which result in rapid growth of blue green algae. Any improvements may take several years but will be of ecological and recreational value to the loch.
- 2.1.2 **Perth STW works** - Appears to have recovered from the significant downturn in performance caused by low flows and a pollution incident. SEPA is awaiting information from Scottish Water to confirm the cause and what can be done to minimise the impact and likelihood of such an incident reoccurring. Press reports suggested there had been a significant number of complaints about this incident which also resulted in odours for several weeks from the plant. SEPA received only about 4 complaints.
- 2.1.3 **Forth Oil Spill** - July saw a spill of oil to the Forth from Ineos. Mixed initial reports and the lack of instigation of Clearwater Forth Emergency Plan by Forth Ports Authority resulted in a delay in the identification of the source. Within minutes of receipt of aerial photographs provided by the Marine Coastguard Agency, SEPA had staff on the ground investigating the cause of the spill with Ineos. A significant amount of cross directorate team working from Chemistry, Marine Science, PR and EPI staff saw a comprehensive exercise of land and sea survey work and analysis of samples undertaken to identify the extent and duration of the impact. An enforcement notice was served on Ineos within two days of commencement of the investigation. Further legal action may be taken leaving matters sub judice at this time. High level communications were maintained between SEPA and Ministers in light of the potential significance of the event. Earlier multi-agency working could have resulted in an earlier identification of the source.
- 2.1.4 **Muir Dean OCCS** - A local public enquiry was held at Crossgates in July regarding an appeal against Fife Council's refusal of permission for the Muir Dean OCCS proposal. The outcome of the enquiry is likely to take a couple of months to determine. There are significant implications for SEPA, as part of the proposal was to remediate the Fordell Castle ferruginous mine discharge which is currently causing downgrading of a significant length of the Keithing Burn.

2.2 Waste

- 2.2.1 **Henry Gray and Sons, Kirkcaldy** - On the 14 September 2006 two staff from the Fife Team visited Henry Gray and Sons a scrap metal site in Kirkcaldy, with the purpose of

checking if a boundary fence had been erected. This fencing had been missing for some time and enforcement action in the form of a section 42 notice under EPA 90 had been served requiring the erection of the fence. The EPOs entered the site and the owner William Gray met them. Mr Gray became increasingly hostile and aggressive and started making threats against specific SEPA staff and SEPA staff in general. This included threatening to “kneecap” a specific member of SEPA staff and to “lamp and scone” any man woman or child from SEPA who entered the site. The SEPA officers retreated quickly as they felt personally at risk. On returning to the office the matter was reported to Fife Police. The police responded quickly taking statements from the officers involved and reporting the matter to the PF. The matter finally came to court on the 9 October 2007 when Mr William Gray was found guilty of breach of the peace and fined £500. The following day SEPA issued a press release which contained the message that SEPA will not tolerate this type of behaviour.

- 2.2.2 **Stather's Auto Salvage, Arbroath.** Following the serving of a Section 59 Notice to remove undepolluted vehicles by 28/9/07 the site has been checked on a number of occasions and while significant progress has been made a report is in preparation for RRT.
- 2.2.3 **Riverside Landfill Dundee.** Notification has been received from the Scottish Government that the appeal by Dundee City Council against modification of their Waste Management Licence for Riverside landfill, Dundee will now proceed to Ministers for determination. Methane gas was detected above trigger levels at external borehole OG1 – initially 11.1%. Increased monitoring was undertaken by Dundee City Council. A warning letter was sent on 22/08/07 regarding failure to comply with licence conditions. Due to increased monitoring and purging at OG1, methane levels have dropped back to zero since 23/08/07.
- 2.2.4 **J Noble & Sons, Randolph Industrial Estate Kirkcaldy.** A section 42 Enforcement Notice was served in relation to the storage of undepolluted vehicles and oily components, security fencing and impermeable surfaces. Inspections during August have found significant improvements at the site.
- 2.2.5 **T in the Park Event.** The Stirling Team carried out inspections at the annual T in the Park event. There were some significant issues regarding the clear-up following the event and a response will be made to P & K's Planning Dept during the multi-agency debriefing. It is likely that some of the conditions may need to be tightened for next year. The site at Balado lies within the Loch Leven catchment and all the foul effluent was collected and disposed of outwith the area.
- 2.2.6 **Dalhousie Business Park, Viridor Glass Recycling.** A meeting was held with Viridor management and Midlothian Council to discuss improvements at the site. Viridor are producing an action plan of improvements. They have also set up a liaison meeting with local residents to take place in September.
- 2.2.7 **Lothian and Borders Area Waste Plan.** The first Strategic Environmental Assessment of a SEPA plan was issued for consultation on w/c 25th June for a 7 week period. The consultation on the Lothian and Borders Area Waste Plan is not technology specific, but the consultation does include options which model Energy from Waste plants and Mechanical Biological Treatment plants to meet Scottish Executive performance targets for recycling, composting, residual waste treatment and landfill. The SEPA led Public Consultation on the Proposed Alteration to the Lothian and Borders Area Waste Plan went out on the 4th July and is due to close on the 22nd August.

2.3 Air

- 2.3.1 **Sacone** - In mid July there was a Health and Safety incident at Sacone. This is being investigated by the HSE. A number of complaints were received around that time as a direct result of the incident. The company then went on shutdown until the 3rd August. During shutdown a number of improvements were implemented by the Company to reduce odours from the site. Weekly meetings have been initiated with the company to drive a programme of odour reduction. Presentations have been given to a local action group and the Community Council. A Liaison group has been established to allow free flow of information between all interested parties. The company have made a few key improvements regarding odour containment although further improvements are being actively pursued. SEPA has made contact with the Consultant in Public Health Medicine to progress concerns of ill health related to odour from the plant. Enforcement action will be taken if warranted. A significant amount of time in September has again been spent on regulating the Sacone rendering and incineration plant at Brechin. The main thrust of this work has been to complete the actions identified in our action plan and to continue to press the company regarding odour reduction. Our odour surveys have shown that odours have reduced significantly over September with only seven public complaints being received. However the delivery of chicken waste to the site has been identified as a source of offensive odour and we are pursuing this with the company in association with the Perth Team. Odour diaries have been returned by members of the public and these give a similar picture of reduced odours. An incident on the 3rd September regarding de-ashing of one of the gasifiers resulted in a warning letter being sent to the company. An application has been received for the replacement of the gasifiers with a rotary kiln. This application is being advertised and copies have been made available in the local library. We are also responding to an appeal against the Enforcement Notice served on the company in June this year.
- 2.3.2 **West Carron Landfill.** A meeting has taken place with the local SEPA team and Ben Ballantyne, Operations Director, Oran Recycling Ltd, to discuss the FOI enquiry and the references made in the previous Board report (para 2.3.5). It can now be confirmed that the matter regarding Financial Provision is resolved and did not result in the delay in issuing the PPC permit. There had been ongoing discussions with the local SEPA officers and site management with regard to landfill gas migration where there were breaches in the site's trigger levels for landfill gas. The site did however comply with the conditions of the permit whereby the matter was reported to SEPA within the specified time period and discussions are underway to develop an appropriate plan of action to deal with the issue. In relation to the situation concerning Planning permission, it can be confirmed that the operator applied for and was granted a Certificate of Lawful Use in 2005. The PPC regulations state that a Certificate of Lawfulness of existing use shall be considered to be relevant planning permission. Falkirk Council has decided that the Certificate of Lawful Use covers land-raising up to the level of adjoining existing ground levels. Therefore the operator does in effect have relevant planning permission in force in relation to the landfill as required by the PPC Regulations.
- 2.3.3 **Scottish Borders Council** - SEPA provided the Scottish Borders Council with a formal response to its annual air quality report (Progress Report). The Council previously highlighted elevated levels of nitrogen dioxide in Galashiels, however the road layout is currently being changed and this should reduce the levels of pollution in the High street. The Council recently extended the nitrogen dioxide monitoring network in Galashiels (in response to advice provided by SEPA) and this will be used to assess the impact of the inner relief road will have on the local air quality.

- 2.3.4 **Ahlstrom Chirnside Ltd – PPC Papermill. Noise & Odour.** Ahlstrom has completed work to reduce noise from a set of roof fans and a SEPA noise assessment on 21 June 2007 confirmed that this work appears to have reduced noise levels. However the noise assessment also confirmed that overall noise levels are still exceeding noise standards set by the World Health Organisation. It is likely therefore that Ahlstrom will be required to undertake work to further reduce noise levels. Until a longer term solution can be identified and implemented, SEPA has formally requested that Ahlstrom take appropriate interim measures to attenuate noise
- 2.4 **Other**
- 2.4.1 **Former Kerr’s scrapyard at Causewayhead, Stirling** - The site is currently subject to preparatory works for a housing development but contains areas of contaminated land. The works will require a mobile plant licence. A remedial strategy was submitted for consideration and discussions were held with Stirling Council's environmental Health Department.
- 2.4.2 **Major Development Proposals** - SEPA has been invited by City of Edinburgh Council to provide comment upon proposed development at Leith Waterfront; an ambitious regeneration initiative including almost 16 000 residential units, business and industrial developments.
- 2.4.3 **E-Planning** - The Scottish Executive’s e-Planning Efficient Government Programme Board has approved SEPA’s Opt Out Business Case (c£300k). Consideration is now being given to the establishment of a project team and ‘technical’ working group to facilitate project implementation. It is expected that a report was placed before CMT for consideration during October.
- 2.4.4 **Finalised Edinburgh City Local Plan** SEPA's response to the Local Plan was sent on the 6th July and contained a number of objections relating to policies and supporting paragraphs on air quality, waste, contaminated land, flooding and the water environment. Following discussions SEPA will retain objections in the meantime but will review them in light of comments made by the Council.
- 2.4.5 **Sustainable Flood Management** - Linda White (Planning Manager) is EPI’s nominated lead to drive a consistent and holistic approach to sustainable flood management through SEPA’s functions. Working alongside Martin Marsden and David Faichney, she contributed to a national workshop held on 1 June to consider transposition of the EU Flood Directive; challenges and opportunities.
- 2.4.6 **Flytipping** - A contaminated land site has been discovered on a small rural industrial estate outside Perth with significant asbestos contamination suspected due to flytipping over an extended period. Perth team have liaised with Perth and Kinross Council contaminated land officer and the new site owner, who purchased the site prior to the discovery of the contamination. Remedial measures are proposed.

3. Environmental Quality Review

3.1 Water Quality and Resources

3.1.1 **Rainfall and River Flow.** Most notable has been the very wet summer during June, July and August. The period saw the highest mean July flows recorded at Spilmersford on the River Tyne since 1965. By mid-August the region had entered a dry spell which has continued through September and October, especially in the east.

Table 1: River Flows in SE Region

River	Gauging Station	June		July		Aug		Sep	
		Mean m ³ /sec	% LTA	Mean m ³ /sec	% LTA	Mean m ³ /sec	% LTA	Mean m ³ /sec	% LTA
River Forth	Craig-forth	19.4	113	23.2	135	32.6	131	15.9	44
River Tyne	Spilmersford	1.8	238	2.4	380	2.0	277	0.66	90
Whiteadder Water	Hutton Castle	7.42	207	13.15	526	5.28	206	2.19	87
River Tweed	Norham	72	199	115	378	59	140	31	62
River Eden	Kemback	2.457	110	4.773	294	4.591	257	2.145	107
River Tay	Ballathie	112.344	135	163.122	232	148.498	171	68.172	56
River Earn	Kinkell Bridge	12.392	127	15.832	191	17558	152	7.003	40

Note – LTA refers to the Long Term Average; m³/sec is cubic metres per second.

Table 2: Rainfall recorded at rain gauges in SE Region

Area	Rainfall Station	June		July		Aug		Sep	
		mm	% LTA	mm	% LTA	mm	% LTA	mm	% LTA
Upper Forth	Strathyre	132.8	143	123.8	126	144.6	113	85.6	48
Edinburgh	Fairmilehead	113	199	98.6	151	79.8	112	39.4	55
East Lothian	Nunraw	169.4	297	126.2	188	109.4	132	44.4	55
Upper Tweed	Shiplaw	146.2	201	102.4	149	81.4	109	52.4	73
Fife	Rossie Farm	92	164	131.4	239	85.8	145	22.6	31
Angus	Cortachy	66.9	106	147.9	218	91.5	122	26.8	29
Perth	Perth	112	190	105.4	173	91.2	155	15.6	20

Note – LTA refers to the Long Term Average; mm is the depth of rainfall in millimetres

3.1.2 **Bathing Waters.** The 2007 bathing water season ended on 15 September. Results from all SEPA bathing waters can be found on the internet site at www.sepa.org.uk. Of the 29 EC designated bathing waters in SE Region 21 met the guideline standard, 7 met the mandatory standard and one failed to meet the mandatory standard. Taken at face value, the results are slightly worse than last year; however, last year's bathing season was one of the driest on record and this year's season was particularly wet and this should be borne in mind when considering the results. The wetter conditions will have resulted in more frequent operation of sewage overflows and increased runoff from agricultural grazing land, both of which are likely to have contributed to the bacteriological loading at monitored sites. The failure occurred at Eyemouth and is believed to have been caused by a combination of sewage inputs and runoff from grazing land. SEPA continues to work closely with Scottish Water and the agricultural community to reduce these sources.

3.1.3 Ecology Monitoring Survey work by SEPA's ecologists entered a new phase this summer, with a marked increase in the range of quality elements assessed. This is being driven by the requirements of the Water Framework Directive. Sampling of rivers and lochs included work on invertebrates, river diatoms, phytoplankton, macrophytes and morphology. The acquisition of new skills and documentation of procedures has been demanding of staff time, but good progress has been made. Operational problems due to high river flows, site access and new qualifications for boat skippers have hindered completion of the planned programme, but close liaison with the staff managing the WFD data project is ensuring that any necessary adjustments are made in good time.

3.1.4 Internal Environmental Policy A recently produced report has documented a 69% reduction in the amount of hexane consumed in the analysis of Organochlorine pesticides in SE Region over the last 3 years. Hexane is a volatile organic compound (VOC), which contributes to the formation of ground level ozone whilst having the opposite effect on stratospheric ozone. The amount of chromic acid used as a glassware cleaning agent in SE laboratory has also been reduced as a result of review and revision of work procedures. All chromic acid prepared and used by the laboratory was previously disposed of to foul sewer. Both of these improvements demonstrate SEPA's ongoing commitment to reducing the impact of its own activities on the environment.

3.2 Air Quality

3.2.1 Local Air Quality Management. Local authorities are required to submit an annual report that details the findings of their on-going review and assessment of the local air quality. At the end of September 2007, ten out of the twelve local authorities in the SE Region had submitted a report, with Perth and Kinross Council and Dundee City Council still to submit their reports. Whilst the air quality in Scotland is generally good, the councils continue to highlight problem areas. Road traffic in particular has been highlighted as being the most significant source of pollution in the urban centres; however one local authority is considering an Air Quality Management Area (AQMA) because of emissions from domestic heating.

3.2.2 Particulate Material. Two councils have expressed concerns about the growing use of domestic wood burners and the emissions of fine particulate material associated with this form of heating. Research has shown that PM_{2.5} (fine particulate <2.5µm in diameter) is a significant risk to human health, and the recently revised Air Quality Strategy contains a new objective of 12µg.m⁻³ (that only applies in Scotland) and introduces the concept of exposure reduction. This will reduce the levels of PM_{2.5} across the whole of the population, as opposed to the current practice of only tackling the hotspot locations.

3.2.3 Urban Air Quality SEPA has traditionally been associated with the regulation of industrial processes; however it also has several routes through which it can influence local air quality issues. These roles are defined in legislation:

- Statutory consultee for Local Air Quality Strategy under Schedule 11 of the Environment Act 1995.
- 'Appropriate Authority' as defined in section 85 of the Environment Act 1995
- Statutory consultee for Development Planning as defined in the Planning etc. (Scotland) Act 2006.

The Environmental Partnership Unit (EPU) is well resourced to fulfil all three of these roles. The knowledge of the Local Air Quality Management Specialist (LAQMS) and the

planning teams are regularly combined to provide informed comments and advice to the planning authorities.

In its capacity as Appropriate Authority for LAQM, SEPA must be aware of any activity, process or change that could increase pollution to such a degree that the air quality standards or objectives will not be achieved. A single large development in an urban centre can generate a great deal of traffic, however when several projects are considered side-by-side, the cumulative impact is far greater. This will be a problem in areas where the air quality objectives are already being exceeded or where they are close to being exceeded. The following examples illustrate this point particularly well:

- 1) City of Edinburgh Council designated an AQMA in 2001 that includes the Haymarket area of the city. The AQMA was designated because the concentrations of nitrogen dioxide (NO₂) were exceeding the EU annual mean air quality objective for this pollutant. SEPA was recently provided with an air quality impact assessment for a development that has been proposed for Morrison Street. The assessment confirmed that the new building would create a 'street canyon' that would disrupt the natural air movements that are needed to dilute the pollution from road traffic. This will increase the already high levels of NO₂ that exist in Morrison Street and exacerbate the poor air quality within the AQMA.
- 2) The EPU has also received a copy of a transport assessment for the proposed redevelopment of Leith Docks. The assessment predicted that by 2015 onwards, the local road network will be heavily congested with significant queues, particularly between Leith and the City centre. Whilst we acknowledge that this report is representative of a worst case scenario (it assumes that the docks had been fully developed and the tram line is operational) we are concerned that this increase in traffic and subsequent congestion will occur in an area where pollution is already exceeding the EU objectives that have been set to protect human health.

3.2.4 **Edinburgh.** The City of Edinburgh Council has completed a number of air quality assessments that have resulted in the designation of an Air Quality Management Area (AQMA) in the city centre and another that has been proposed along the St. Johns Road. Recent reports have shown that the concentrations of NO₂ in Great Junction Street and West Port are also currently exceeding the EU air quality objectives. The levels of pollution in Easter Road are being closely monitored for the same reason. However, these results do not mean that air quality in Edinburgh is getting worse; it merely implies that the problem is more widespread than first thought.

3.2.5 **Pathhead.** Midlothian Council has recently completed an assessment of particulate material in Pathhead. The study has shown that whilst the concentrations of particulate material will meet the EU objectives, they will exceed the stringent annual mean objective (18µg.m⁻³) that only applies in Scotland. It is thought that these elevated levels are due to emissions from domestic heating sources.

3.2.6 **Grangemouth** Monitoring of ambient air quality has shown that the concentrations of sulphur dioxide in Grangemouth can vary from year to year and from site to site. The 15-minute objective was exceeded every year between 2001-2004, but it was not exceeded in 2005 and 2006. Table 1 below shows no obvious pattern to these exceedances, therefore it was extremely difficult to establish if the situation was improving. Falkirk Council decided to err on the side of caution and an AQMA was designated in November 2005. Recent monitoring has shown that there were 242

exceedances of the UK 15-minute air quality threshold value between January-August 2007, with the majority of these being recorded at the Municipal Chambers and the new monitoring site at the Moray School. The cause of the exceedances has yet to be established, but it is likely to be attributable to a change in local emissions and unfavourable weather conditions.

3.2.7 **Falkirk Council** has been working with SEPA to produce an Action Plan that will increase the monitoring network, enhance the existing communication links between SEPA and the Council and improve the way in which monitoring data is provided. The Council has also proposed setting up a formal action group that will focus on the air quality issues in this area. The Grangemouth Refinery is recognised as one of the main contributors of sulphur dioxide emissions within the Air Quality Management Area. Accordingly, SEPA is requiring the Operator (Ineos Manufacturing Scotland Ltd) to prepare a Sulphur Dioxide Reduction Strategy, the purpose of which shall be to assess the levels of SO₂ emitted from the Permitted Installation, the potential impact of these emissions on environmental receptors and an assessment of options to minimise the impact on environmental receptors (as far as is reasonably practicable). The SO₂ Reduction Strategy shall include: reviewing the indicative Best Available Techniques (BAT) benchmarks for each emission location, a summary of emissions monitoring and modelling undertaken and a programme for any proposed improvements. We have also worked closely with the Operator to get them to develop a means of gathering real-time process information for the brief period of time leading up to recognised exceedances of the AQ objective. This has proven to be of great assistance during our investigations.

Monitoring station	15min							1hour							24 hour						
	100ppb			266ug/m ³				132ppb			350ug/m ³				47ppb			125ug/m ³			
	Permitted number of exceedances			35				Permitted number of exceedances			24				Permitted number of exceedances			3			
	2001	2002	2003	2004	2005	2006	2007 ⁽¹⁾	2001	2002	2003	2004	2005	2006	2007 ⁽¹⁾	2001	2002	2003	2004	2005	2006	2007 ⁽¹⁾
Inchyra Park	8	41	21	60	4	14	0	0	0	2	6	0	1	0	0	0	0	1	0	0	0
Municipal Chambers	49	418	149	9	2	3	108	5	51	13	0	1	0	6	1	7	0	0	1	0	1
Moray School ⁽²⁾							122							6							2
Hope St, Falkirk	2	1	1	1	0	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Park St, Falkirk	0	0	0	0	0	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bo'ness	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Table 3: Exceedance of the sulphur dioxide air quality objectives in Grangemouth 2001 - 2007

Notes: (1) January – August 2007
(2) Moray School monitoring site introduced November 2006.

3.3 Other

- 3.3.1 **Water Framework Directive River Basin Management Planning** The Significant Water Management Issues consultation reports for the Scotland and Solway Tweed River Basin Districts were published on the 9 October 2007. Summary copies were sent to both National and Area Advisory Group members and the full report is available online at www.sepa.org.uk/consultation.
- 3.3.2 Additionally, the Scoping Reports for both the Strategic Environmental Assessment of the Scotland River Basin Management Plan and the Solway Tweed River Basin Management Plan were published on the same day. This report sets out the scope and level of detail of the environmental assessment and the proposed method to be used to undertake the assessment. A formal consultation on the report is not being conducted (a full public consultation will be held on the SEA Environmental Report when it is published) but advisory group members have been invited to provide feedback on the scoping report if they wish. These comments will be considered by SEPA as it takes forward its SEA work. The report has also been sent to the statutory SEA consultees, Historic Scotland and Scottish Natural Heritage and their equivalents in England for the Solway and Tweed River basin District.
- 3.3.3 A number of sub group meetings have been held by the Area Advisory Groups to consider how measures can be developed to address the non-regulatory pressures of diffuse pollution, historic morphological impacts and alien species on the 'at risk' water bodies. These groups have considered whether existing measures on a water body are sufficient to achieve good ecological status in the first planning cycle (2009-2015), whether there are any additional measures which can be identified for water bodies and the timescales and funding considerations for these measures. Additional measures will be stored on a central spreadsheet for transfer to the measures database at a later stage. Meetings are still on going and once completed the additional measures identified will be reviewed with the Area Advisory Groups.
- 3.3.4 A number of internal SEPA meetings have also been held with local staff on a team area basis, which River Basin Management Planning coordinators have attended. This has provided an opportunity for local staff to identify regulatory measures and propose objectives for those water bodies that are subject to pressures that can be regulated through the Water Environment (Controlled Activities) (Scotland) Regulations 2005.
- 3.3.5 The regulatory and non-regulatory measures identified during the meetings mentioned above will be incorporated into the draft River Basin Management Plans that will go out for consultation at the end of 2008, with final plans being published in December 2009.
- 3.3.6 A timetable for producing the draft River Basin Management Plans for both the Scotland and Solway Tweed River Basin Districts has been prepared and will be presented for agreement at a SEPA RBMP Editorial Board meeting to be held on 31 October 2007. In addition, a draft structure for the plans has been produced and work has started on the text.

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