

BICESTER, PLOT A OFFICES REMEDIATION STRATEGY

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Site Address:	Development at Lakeview Drive, Bicester	



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Author	Signature	Date
L Woods		
BSc (Hons) MSc		26 October 2023
Graduate Geo-Environmental Engineer		
Reviewed	Signature	Date
R Allen		
BSc (Hons) MSc FGS MCIWEM C.WEM CEng	-	26 October 2023
Associate		
Authorised	Signature	Date
R Allen		
BSc (Hons) MSc FGS MCIWEM C.WEM CEng	N.	26 October 2023
Associate		

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1 INTRODUCTION

This Remediation Strategy has been prepared by Curtins for Peveril Securities Ltd (the Client) to provide guidance with respect to remedial requirements for the proposed development site at Lakeview Drive, Bicester, Oxfordshire, OX26 1DE.

The proposed development on site comprises the construction of up to 55,000m² of office space, this Remediation Strategy refers to the Plot A Office building only.

The site has been characterised through a desk-based Phase 1 Geo-Environmental Assessment (Ref. 1) and a Phase 2 Geo-Environmental Assessment (Ref. 2) undertaken by BWB in August and September 2017 respectively.



Figure 1 – Site Location Plan

It must be noted that this Remediation Strategy refers only to the Plot A Office. A site location plan is presented in *Figure 1* with the approximate site boundary for the Plot A Offices outlined in red.

The wider site is irregular in shape and occupies approximately 21.0 Ha of land. The site currently comprises three large open fields used for grass / hay making a landscaped area to the north; and a large pond. Two drainage ditches cut north to south across the site. The Plot A Offices site occupies approximately 1.10 Ha of land in the north-west of the wider site and comprises vacant land with a stone roadway, believed to have formed a yard area during recent development works (Ref. BWB Phase 1, 2017).

1.1 Requirements of the Remediation Strategy

The Remediation Statement is to account for the following;

- A description of the materials likely to be encountered by the developer and their contractor/sub-contractors;
- Proposals for excavations with respect to the materials likely to be encountered;

- Revised risk ratings associated with ground contamination and primary pollutant linkages remaining;
- Recommendations for the specification of the cover of Made Ground soils in proposed soft landscaped areas;
- Recommendations for appropriate PPE and managing asbestos appropriately during construction;
- Recommendations for re-use of materials and use of a Materials Management Plan (MMP);
- A strategy a watching brief during earthworks and for handling potentially contaminative incidents.
- Proposals for the verification of remedial measures, including a regime for verification and chemical analysis
 of the cover layer material;

1.2 Definitions

In this document the following definitions apply:

Contractor Refers to the appointed contractor responsible for undertaking the remediation works.

Site Manager Refers to a representative of the appointed contractor resident on site.

Engineer Refers to a suitably qualified representative from Curtins, who would not normally be resident on site.

1.3 References

The Remediation Strategy has been prepared with reference to the following existing reports;

- Reference 1: BWB (2017) Phase 1 Geo-Environmental Assessment. Ref. LDB-BWB-00-XX-RP-EN-0001-DS_P1
- Reference 2: BWB (2017) Phase 2 Geo-Environmental Assessment. Ref. LDB-BWB-00-XX-EN-RP-0001_PH2_P1

2 GROUND CONDITIONS

The following sections present a summary of the ground conditions identified during the BWB intrusive ground investigation.

2.1 Made Ground

Made Ground soils were recorded in all exploratory hole locations associated with the Plot A Offices (BH101, BH102, TP101, TP102, TP103 and TP124) from ground level to a maximum depth of 1.00m bgl. Thickness of Made Ground encountered during the ground investigation ranged between 0.20m and 1.00m.

Made Ground descriptions comprised firm brown / dark brown / yellow or grey sandy gravelly clay; brown gravelly sand; brown occasionally yellow sandy, gravelly cobbles; and firm brown mottled grey clayey, gravelly sand (reworked natural ground).

Rare anthropogenic fragments comprised brick, plastic, timber, ceramic, concrete, asphalt, and glass.

2.2 Superficial Deposits

2.2.1 Topsoil

Topsoil was encountered within TP124 only, from ground level to 0.25m bgl. This topsoil comprised grass over brown slightly clayey gravelly fine and medium sand with frequent rootlets. The gravel comprised fine to coarse, angular quartzite, flint, and limestone.

2.2.2 Alluvium

Superficial deposits of Alluvium were encountered within BH102, TP102 and TP103, from depths of 0.20 to 0.80m bgl, with thicknesses ranging from 0.30m to 0.50m. The Alluvium comprised stiff greyish brown mottled yellow and orange slightly gravelly clay with occasional rootlets in BH102; firm brown to dark brown slightly sandy gravelly clay and brown mottled grey clayey gravel of limestone, flint and quartzite in TP102; and soft slightly gravelly clay with occasional rootlets in TP103.

2.3 Bedrock Deposits

2.3.1 Kellaways Clay Member

The Kellaways Clay Member was encountered within TP101 and TP102, interbedded with weathered Cornbrash Formation deposits. This stratum was encountered from 1.60m, 1.95m and 2.33m bgl with thicknesses ranging between 0.32m and 0.50m; it was described as soft to firm dark grey / light brown sandy, gravelly clay and as grey to dark grey slightly sandy, cobbly gravel of mudstone.

2.3.2 Cornbrash Formation

Bedrock deposits of the Cornbrash Formation were encountered within all exploratory holes located within the Plot A Offices site. Both weathered and competent Cornbrash Formation deposits were encountered at depths from 1.00m to 2.80m bgl with thicknesses ranging between 0.20m to 1.25m.

The Cornbrash Formation encountered on site was variable, with deposits of sand, gravel, cobble, and competent limestone. Cornbrash Formation deposits comprised very dense light brown / yellowish brown / orange / grey / dark grey, clayey, sandy gravel of limestone; yellow and grey gravelly, fine to medium sand with cobbles; yellowish grey slightly sandy, slightly gravelly cobble of limestone; and very dense, dark grey weathered limestone recovered as slightly clayey, slightly sandy gravel of mudstone and/or limestone.

3 GROUND & GROUNDWATER CONTAMINATION

3.1 Ground Contamination

During the BWB 2017 ground investigation environmental chemistry results were compared with a Generic Assessment Criteria for soils with respect to human health for a '*Commercial end use*'. Results showed that all samples sent for chemical analysis had concentrations below the relevant screening criteria for each contaminant.

BWB noted (Ref. 2) that one hotspot of total TPH was recorded in a Made Ground sample from TP102 (0.10 - 0.20m bgl) with a concentration of 1000 mg/kg, against an initial screening criteria of 500 mg/kg. However, speciated analysis on the same sample confirmed that al split aliphatic and aromatic banding concentrations were below the relevant screening criteria and therefore does not represent a risk to human health.

Soil samples were also analysed for the presence of asbestos; two samples of Made Ground returned a positive identification for loose chrysotile fibres (TP102 at 0.10 – 0.20m bgl and TP103 at 0.20 – 0.30m bgl).

3.2 Leachable Contamination

BWB collected several superficial water samples from Made Ground for analysis in 2017. Several exceedances of copper, lead, nickel, and zinc were identified against EQS Screening Values, with the exceedances presented in *Table 1* below.

Determinant	Exploratory Hole ID	Concentration Range (µg/I)	EQS Screening Value (µg/l)	
	TP101 – 0.20 to 0.30m			
Copper	TP101 – 0.40 to 0.50m	22.0 - 42.0	1.0	
	TP102 – 0.10 to 0.20m			
	TP101 – 0.20 to 0.30m		1.2	
Lead	TP101 – 0.40 to 0.50m	1.8 - 6.8		
	TP102 – 0.10 to 0.20m			
Niekol	TP101 – 0.10 to 0.20m	4.2	4	
NICKEI	TP102 – 0.10 to 0.20m	4.2	4	
Zinc	TP102 – 0.10 to 0.20m	12	10.9	

Table 1 – BWB 2017 Leachable Exceedances against EQS

BWB (Ref. 2) noted that several contaminants including cyanide (total) and mercury are indicated to be elevated on the leachate screening sheet, however, the laboratories lowest detection limit is higher than the screening value used, and therefore, these contaminants are considered to represent a low risk.

The risk to groundwater underlying the site (Secondary A Aquifer within the Cornbrash Formation) within the BWB report (Ref. 2) was considered marginal due to the limited concentrations of heavy metals recorded with the soils across the site. The proposed development is understood to comprise significant hardstanding and limited soft landscaping, therefore reducing the risks associated with leachable contaminants.

3.3 Groundwater Contamination

BWB collected several groundwater samples from BH101 and BH102, with two exceedances recorded when compared against the EQS Screening Values, exceedances presented in *Table 2* below.

Table 2 – BWB 2017 Groundwater Exceedances against EQS

Determinant	Exploratory Hole ID	Concentration (µg/l)	EQS Screening Value (µg/l)
Copper	BH102	8.2	1.0
Mercury	BH102	0.11	0.07

BWB (Ref. 2) noted that the exceedance of mercury is only marginally above the screening criteria and therefore considered this unlikely to represent a significant risk to controlled waters.

3.4 Ground Gas

BWB completed four gas monitoring visits between the 24th of August and 13th of September 2017 following the ground investigation. Both borehole locations were installed with ground gas monitoring wells, with the response zones targeting the Cornbrash Formation.

Barometric pressures ranging between 991mb and 1013mb were recorded during the monitoring period, with rising, steady and falling atmospheric conditions.

Hydrogen sulphide concentrations were not recorded above the limit of detection during the monitoring period, carbon monoxide was detected within BH101 at a peak concentration of 21ppm.

The BWB report (Ref. 2) states the gas flow within both wells was recorded at 0.1 l/hr throughout the monitoring period; the concentration of methane (CH4) was recorded at <0.1% $^{v}/_{v}$ in both locations throughout the monitoring period; and the steady state and peak concentrations of carbon dioxide (CO2) were recorded at 0.1 – 0.4% $^{v}/_{v}$ and 3.5 – 3.7% $^{v}/_{v}$ respectively.

The GSV for this monitoring period has been calculated as 0.0037 l/hr, corresponding to a CS-1 (Characteristic Situation 1) not requiring any ground gas protection measures.

4 CONCEPTUAL SITE MODEL

A Conceptual Site Model (CSM) for the site has been developed as part of the BWB site investigation that was undertaken at the site and considered based on the current works proposed.

The CSM details a number of pollutant linkages at the site, however, based on the risk assessments undertaken, the potential contaminant linkages (PCLs) listed in *Table 3* were identified as requiring remediation to enable the safe redevelopment of the site.

Table 3 – Potential Contaminant Linkages

PCL	Sources	Receptor	Risk	Potential Pathway	Remediation Recommended		
1	Made Ground – presence of asbestos fibres and hotspot of total TPH.	End Site Users (Office Building)	Low				It is understood that the development is likely to be predominantly covered by buildings and hardstanding surface cover, therefore limiting any potential contact by the future site user.
		Construction Workers	Moderate / Low	Inhalation of dust particles and dermal contact.	A clean son cover system is recommended in areas of soft landscaping overlying the Made Ground deposits to break the pathway between the asbestos fibres and future site workers. The risk to construction and groundworkers can be minimised by the adoption of appropriate PPE and respiratory protective equipment (RPE). It is recommended that the ground surface is kept damp to minimise the movement of free fibres.		
2	Elevated contaminants (Copper and Mercury) within the groundwater beneath the site.	Secondary A Aquifer	Low	Migration of	The concentrations recorded are only slightly elevated. Furthermore, it is understood that the development is likely to be predominantly covered by		
		Tertiary Rivers on site (drainage ditches)		groundwater.	buildings and hardstanding surface cover, therefore limiting leaching and migration of contaminants.		

Section 7.0 presents a strategy for handling unexpected contamination or contaminative incidents. It is further recommended that watching brief/periodic site visits are undertaken by a Geo-Environmental Engineer to record any unexpected contamination as outlined in Section 7.3.

5 REMEDIAL WORKS

In this document the term 'remediation' is used to define specific works required to address potential issues arising from contamination in site soils and ground gases, with due account taken of the known history of the site and the proposed end-user.

With reference to the Conceptual Site Model and the potential contaminant linkages detailed in *Table 3* two remedial actions are recommended in order for the site to be brought up to a condition that is deemed 'suitable for use';

- **Remedial Action 1:** Appropriate PPE for all construction workers and suitable asbestos management measures.
- **Remedial Action 2:** Engineered capping to serve as physical barrier between Made Ground and site surface in soft landscaped areas preventing direct contact, dermal uptake and limiting the derivation of dust.

Measures for dealing appropriately to unexpected contamination encountered on site and the recommendation for a watching brief (part time) by an Environmental Engineer during earthworks are outlined within Section 7.3.

5.1 Remedial Action 1 – Contamination and Asbestos Management During Construction

Under current health and safety legislation, employers are required to carry out their own appropriate risk assessments and mitigation to protect themselves and their employees, other human receptors and the environment from potential contamination. Such risks must be adequately mitigated by law, specifically the Construction Design Management (CDM) Regulations, 2015 which require that potential risks to human health and the environment from construction activities are appropriately identified and all necessary steps taken to eliminate / manage that risk.

It has been assumed that any future construction works on site will be undertaken in compliance with these requirements to address PCL1 (*Table 3*).

CL:AIRE have published guidance to aid in the classification of remediation works on Asbestos Containing Soils (ACS) compliant with Control of Asbestos Regulations 2012 (CAR). This is detailed in CL:AIRE (2016) "Control of Asbestos Regulations 2012 - Interpretation for Managing and Working with Asbestos in Soil and Construction and Demolition Materials: Industry Guidance.

Any works with asbestos containing soils are required to determine their classification in accordance with Control of Asbestos Regulations 2012. The specialist groundworks contractor is therefore to designate the works based on the investigation results but utilising their own additional testing and delineation if they deem it to be required. Subsequently the specialist groundworks contractor is to compile a method statement to establish an appropriate management, monitoring and supervisory procedure for the movement of soils as part of the required cut and fill (earthworks) operations. The specialist remediation contractor is to be responsible for management and record keeping as detailed in their method statement document.

Where, from the site investigations, materials are known to contain asbestos fibers good practice (JIWG CAR-Soil and CAR 2012) prescribes such material to be segregated to ensure materials would not cross-contaminate other soils and to reduce the risk of further fiber release to site workers.

Section 3.1 above should be consulted together with BWB's Phase 2 Geo-Environmental Assessment Report, Exploratory Hole Location Plan Drawing and Exploratory Hole Logs (Ref. 2) for the locations, depths and type of asbestos identified during the Ground Investigation.

Materials containing asbestos >0.1% w/w would be classed as hazardous waste.

Good practice prescribes that any fragments or asbestos containing materials where identified should be picked where possible and to be kept separated in line with those from any soil arisings. This is typically carried out by picking visible fragments at the point of excavation. Such operations are carried out by suitably qualified staff, wearing disposal overalls (type 5/6), gloves and fine dust (FPP3) masks in combination with adoption of dust suppression techniques and monitoring or other applicable methods as recommended by the Asbestos Management Specialist. The qualified

staff are to be trained in the identification of asbestos at source. The qualification and competencies of all operatives undertaking monitoring and calibration documentation of equipment should be provided to the Engineer.

Existing Made Ground should not be crushed or in any way treated due to risk of asbestos fibre release. It may be possible to use Made Ground soils as general fill subject to in situ trial tests and where managed appropriately by the Method Statement compiled by the Asbestos Management Specialist.

5.2 Remedial Action 2 – Engineered Capping

The primary PCL identified at the site relates to the direct contact, dermal uptake, soil and dust ingestion and inhalation of asbestos fibres in soil and soils and soil derived dust (PCL 1, *Table 3*).

The potential for exposure to asbestos fibres is highest within soft landscaped areas where receptors (maintenance staff and public) at the site are most likely to come in contact with the contaminated Made Ground soils. Drawings are included within *Appendix A*.

Hardstanding, including the building footprints, vehicular tarmac, pedestrian tarmac and concrete and block paving are considered sufficient to break the potential contaminant linkage, PPL 1, detailed in *Table 3* and therefore no specific remediation measures, above activities required for construction, are considered necessary if and where these are installed at the site.

For all soft landscaped areas, a clean cover layer is recommended. It is therefore recommended that verified clean capping, comprising a minimum total thickness of 300mm is incorporated in general soft landscaping areas. This is to be made up of a minimum 150mm imported topsoil and 150mm of sub-soil. Additionally, a high visibility warning geotextile break layer or anti-dig break layer is to be installed beneath the clean cover system.

This is anticipated to provide adequate protection of human health with consideration of likely exposure and should be incorporated in all proposed soft landscaped areas.

6 SPECIFICATION FOR SITE WON AND IMPORTED SOILS

This section outlines the required chemical testing specification that the proposed engineered capping must meet to satisfy Remedial Action 2 along with a chemical testing specification. This does not cover general fill materials as it is anticipated this will be covered within the earthwork specification.

6.1 Sourcing of Materials

6.1.1 Off-Site Sources

It is anticipated that materials may be imported to the site for use in constructing the clean engineered capping across the site's soft landscaping areas. It is strongly recommended that materials are sourced from reputable suppliers and comprise materials that have been suitably processed to produce standardised materials.

It is not recommended that materials are imported directly from 'donor' development sites. Imported material will also require verification testing to ensure suitability for reuse, and it is strongly advised that the Contractor undertake their own independent verification testing if accepting material from a third party, rather than relying on supplier reports.

It is anticipated that crushed hardcore stone and brick may be imported for use in earthworks such as in construction of piling mat.

6.1.2 On-site Sources

Based on the findings of the Ground Investigation, it is considered highly unlikely that the general shallow Made Ground could be considered 'uncontaminated', 'clean' or 'suitable' material for re-use as a subsoil or topsoil in soft landscaped areas due to the presence of asbestos fibres at two separate locations across the site.

Within the wider site, the ground investigation found that the topsoil was largely 'suitable for use' when compared to BWBs assessment criteria (Ref. 2). It is possible that under a Materials Management Plan (MMP) topsoil from other areas of the site could be transferred to the Plot A Offices area of site to form part of the engineered capping layer.

6.2 Imported Topsoil

Imported Topsoil will invariably be required and should be supplied and placed in accordance with the Architects' specification but generally it is anticipated that all topsoil will be a minimum of 150mm thick in proposed soft landscaped areas (as part of the 300mm overall layer thicknesses as detailed in *Section 5.0*. Where topsoil is imported, it is to be 'Multipurpose' in accordance with BS 3882:2015 'Specification for Topsoil and Requirements for Use'.

The topsoil should also be confirmed to be 'suitable for use' as per the analysis outlined in Section 6.4.

6.3 Imported Subsoil

Where imported subsoil is required as part of the growing medium this can be cohesive or granular but should be freedraining and confirmed to be 'suitable for use' as per the analysis outlined in *Section 6.4* and compliant with BS 8601:2013 'Specification for subsoil and requirements for use'.

6.4 Chemical Composition of Soils

All materials used in capping should not contain concentrations of contaminants that present an unacceptable risk to the health of future site occupants or off-site receptors.

The Contractor shall be responsible for demonstrating that imported material is 'clean' and therefore suitable for use as part of the engineered capping or else as fill material. This will include the recovery of samples for laboratory testing from both the material source and verification testing of material following delivery to site. The required testing frequencies for materials source types are detailed below. Other sources may be applicable, however testing frequencies shall be confirmed with the Engineer prior to acceptance.

Table 4 – Environmental Chemistry Testing Frequency for Soils

Impacted Soils	Testing Frequency
Imported Topsoil/Subsoil (Greenfield/ Manufactured)	On Site Verification: One sample every 200m3 used (or a minimum of 4 No. samples, whichever is greater), testing to be undertaken once material is imported to site.
Imported Topsoil/Subsoil (Remediated/ Brownfield/ Unknown)	On Site Verification: One sample every 50m3 used (or a minimum of 4 No. samples, whichever is greater), testing to be undertaken once material is imported to site.
Topsoil/Subsoil from other areas of the site	On Site Verification: One sample every 50m3 used (or a minimum of 4 No. samples, whichever is greater), testing to be undertaken once material has been placed/stockpiled for use.

The environmental chemistry testing requirements and frequency are as Table 4 & Table 5. Additions to the suite and frequency of sampling may be required based on the source of imported materials. For example, if the imported Topsoil is not naturally sourced, e.g., recycled soil, further chemical determinants may be added to the chemical analysis suite at the discretion of the Engineer.

Table 5 – Environmental Chemistry Analysis Suite for Soils

Suite Reference	Environmental Chemistry Analysis
Greenfield, Brownfield or Manufactured Soils	Total metals: Arsenic, cadmium, chromium, chromium VI, lead, mercury, selenium, copper, nickel, zinc, water soluble boron; pH Soil Organic Matter Asbestos Screening Polycyclic Aromatic Hydrocarbons by GC-MS (Detection Limit 0.1mg/kg for each compound) Total Petrol Hydrocarbons (Full TPHCWG analysis – aromatic/aliphatic split, Detection Limit 0.01mg/kg for each banding C5 to C10 and 1mg/kg for bandings above C10)

Assessment criteria: Concentrations of the above determinants shall not exceed the 'Residential without Home Grown Produce' screening criteria (contained within Appendix B).

Definition of 'clean': Where ALL concentrations are less than these values the soils shall be defined as 'clean'.

Soil organic matter (SOM): A review of the thresholds may be made for specific soil sources whereby the Soil Organic Matter ranges.

6.5 Validation of Capping Thickness in Soft Landscaped Areas

Confirmatory analysis outlined previously is required to confirm the suitability of the capping layer.

Evidence that the specified depth of capping has been provided will be required.

Evidence could either be in the form of topographic surveys at the base of excavations together with material order sheets (geo-textiles) and the final finish levels or hand excavated trial pits advanced in areas where material has been placed.

The pits shall be excavated to the base of the interface between the existing Made Ground and the engineered capping layer with the geo-textile membrane or granular break layer clearly visible.

A photographic record of the hand excavated trial pits would also be required in accordance with the best practice examples.

7 STRATEGY FOR HANDLING POTENTIALLY CONTAMINATED SOILS AND CONTAMINATIVE INCIDENTS OF SITE

7.1 Contaminated Soils

Surplus soils to be removed from site, which have been identified as unsuitable for re-use should be loaded onto a lorry, covered securely, and transported directly to the landfill facility.

Where stockpiling is unavoidable, the stockpile should be located on an impermeable membrane and be covered also with a low permeability membrane at the end of each working day. Where soils are wet when excavated, measures should be taken to ensure there is no runoff from the soils onto the surrounding soils.

Duty of Care: Under his duty of care, the Principal Contractor shall ensure the proper and safe disposal of waste from each site after it has been passed on to another party. In this respect details of the landfill facility to be used and the company disposing of the waste with regard to hazardous and non-hazardous waste shall be provided to the Site Manager. Copies of Consignment Notices for special waste and Waste Transfer Notes for hazardous and non-hazardous waste shall be kept on site for review by Curtins Consulting.

7.2 Contaminative Incidents

It is possible, however unlikely, that some below ground features / structures exist that have not been recorded on plans and have not been encountered during the ground investigation works. It is possible that unknown/unrecorded substructures (e.g. fuel tanks) may exist which if ruptured may release materials that could contaminate the surrounding soils and groundwater (petroleum hydrocarbons, solvents, for example). In the unlikely event that this occurs an outline strategy is detailed below.

Where such a tank/pipework is damaged during excavation and the contents are released into the surrounding soil, the tank/pipework should be immediately pumped dry into another suitable container and a trench with a low permeability base formed around the tank/pipework to prevent seepage laterally and to collect the contaminant. Where groundwater is encountered in the trench, it should be pumped into a suitable container and tested for the contaminant. All soils affected shall then be tested and removed from site as appropriate.

Where the damage is caused to the underside of a tank and seepage is vertical, the contaminants may present a risk of polluting the groundwater. In this instance and subject to the findings of a risk assessment boreholes may be required to prove and intercept the contaminant. The contaminant will then be pumped into suitable containers.

The procedure outlined in *Section 7.3* should also be adhered too and the Engineer shall approve all proposals for such remediation.

7.3 Unexpected Contamination & Watching Brief

In the event that material is revealed on the site of a nature that does not accord with the previously observed and recorded descriptions the following procedure is to be complied with.

- a) Cease and make safe all excavations in this location and report observations to the Site Manager.
- b) The Site Manager is to notify the Engineer.
- c) Under guidance of the Engineer take representative samples of the suspect materials and forward to a suitably accredited laboratory for analysis.
- d) Contaminated Land Planning Officer and if relevant the Environment Agency are to be kept fully informed of any such occurrences. Contaminated Land Planning Officer must agree the strategy for dealing with unexpected contamination before works continue in that area.
- e) Await Engineers instructions with respect to re-commencement of the works and or removal from of suspect material to a suitably licensed disposal facility (following guidance outlined in Section 8.1 above).

It is recommended that in addition to the above a 'watching brief' for unexpected contamination is undertaken. It is recommended that this includes periodic site visits undertaken by the engineer during the groundworks phase such during site preparation, removal of contaminated soils from site as well as visiting site as soon as potential contamination is observed by the contractor. Records of any unexpected contamination must be included within the Remediation Completion Report.

7.4 Health & Safety

This section details health and safety requirements associated with contaminated land but does not seek to cover all aspects to be managed by the Contractor under CDM Regulations and detailed in Method Statements.

The works are likely to generate soils, dust, groundwater, and other materials that may be impacted with petroleum hydrocarbons and other related chemicals. The Contractor shall incorporate in its health and safety plan provisions for protecting personnel from physical and chemical hazards associated with these materials. The health and safety plan should also incorporate personnel decontamination requirements and facilities.

7.4.1 Contractor Method Statements

The Contractor is required to prepare method statements relating to the separate tasks highlighted and provide these to the client or Principal Designer along with the Engineer for review prior to the commencement of the related works.

The Contractor shall induct all its employees and subcontractors into the relevant aspects of their health and safety plan and method statements prior to each employee and/or subcontractor commencing works on site.

No works shall commence until the clients' nominated Principal Designer has approved the task specific method statement.

7.4.2 Excavation & Other Works

Before commencement of any excavation or other works, the following minimum precautions should be observed:

- Clearance of services;
- Appropriate 'Danger' notices displayed, and exclusion 'work' zone enforced;
- Exclusion of ignition sources within the work zone;
- Provision of a water supply hose/mist to damp down the area in the event that asbestos fibres are disturbed; and
- Exclusion of personnel from the immediate worksite except for those directly involved with the phase of works.
- The above listed precautions do not override other precautions that will need to be covered by the Contractor's overall Health and Safety Plan, aspects such as firefighting, PPE, excavation stability/shoring (if required) etc.

7.5 Environmental Controls

Environmental Controls are the responsibility of the Contractor. However, in general this section details specific requirements for potentially contaminated soils and is not intended to cover all aspects to be managed by the Contractor and detailed within their Method Statements.

Without limiting the Contractor's obligations, it shall be their responsibility to comply with all applicable laws, regulations and rules relating to potential contamination with regard to:

- Surface water run-off.
- Airborne particulates/vapours/odour; and,
- Control of spillage.

Method statements are to be provided to the Engineer and should incorporate the environmental management measures pertaining to the above factors, with further detail given below.

7.5.1 Surface Water Run-Off

The Contractor is responsible for ensuring that site surface water run-off does not leave the site.

The Contractor is to provide for necessary surface water diversion systems as required to keep the construction area free from excess surface or groundwater that may interfere with the works.

All personnel engaged by the Contractor should be trained in response techniques (e.g., use of absorbent materials, etc.) to ensure that any surface water run-off with fuel leakage impact or associated potentially contaminated soil is managed appropriately.

7.6 Airborne Particles/Vapour/Odour

The Contractor is responsible for the implementation of dust suppression in work areas, using water or other means of suppression that are not considered harmful to the environment. The Contractor should also set out procedures for the mitigation of any potential odours that may arise from exposed contaminated soils that could affect off-site users (adjacent residents).

7.7 Control of Spillage

During the phase of works, any type of spillage (including fabricating, hydraulic oils, fuels and/or other materials) should be immediately contained, removed, and disposed of, with any further surrounding areas cleaned.

8 VERIFICATION

Validation visits shall be undertaken by an appropriately qualified environmental engineer throughout the construction phase to ensure that the requirements of the Remediation Strategy have been implemented at the site. This includes periodic visits/watching brief during groundworks. It is anticipated records of the following will be taken during the below phases of work:

- Placement of the requisite depths of clean capping material in required areas of proposed soft landscaping
- Documentation of general works including records from watching brief, asbestos management procedures during the works and records of contaminative incidents and any unexpected contamination; and,
- Removal of contaminated soils from site for off-site disposal.

All associated documentation pertaining to the above will be supplied to the Engineer and incorporated within a Completion Report.

Confirmatory analysis is required to confirm the suitability of any imported material, the results of which will be included within the Completion Report. Any additional, confirmatory testing will also be included herein.

Verification through either hand excavated trial pits or comparison of reduced and final level surveys will all be included within the Completion Report to confirm the provision of a requisite depth of clean capping.

The frequency and timing of visits by Curtins shall be determined following confirmation of the construction phase programme and the chosen protection elements.

9 REPORTING

A Completion Report will be required on completion of the works confirming that the remedial works have been completed satisfactorily. The report will contain information including the following:

- Confirmation that the capping has been installed as specified within the various proposed soft landscaped areas, including capping thickness validation records and photographs;
- Confirmation of imported capping materials suitability for soft landscaped areas including environmental chemistry testing results;
- Records of waste transfer notes and consignment notes for contaminated material disposed of off-site.
- Details and documentation of asbestos management measures utilised during the works;
- Confirmation that the remediation has been undertaken satisfactorily and in accordance with the Remediation Statement;
- Confirmation that the remediation objective has been achieved (see Section 5.0);
- Details of any unexpected contamination encountered on site and appropriate measures taken to respond; and,
- Revised conceptual model showing no potentially significant contaminant linkages remain at the site.

It should be noted that the above list does not include the requirements of an Earthworks Completion report and Materials Management Completion report (where soils are re-used under an MMP) which are also likely to be required in addition to the above remediation completion report.

APPENDICES

Appendix A – Drawings & Specifications

Appendix B – Screening Criteria for Imported Materials

Appendix A - Drawings & Specifications



Appendix B - Screening Criteria for Imported Materials

Adopted Soil Generic Assessment Criteria Sandy loam with 6% SOM



Contaminants	Residential with	Residential without	Allotments	Commercial	Public open space	Public park
	home grown	home grown			near residential	POSpark
	produce	produce			nousing POS _{resi}	
Metals						
Beryllium	1.7	1.7	35	12	2.2	63
Boron	290	11,000	45	240,000	21,000	46,000
Cadmium	10 ⁽¹³ 22	85 ¹³ <u>150</u>	1.8 <u>3.9</u>	230 <u>410</u>	120 <u>220</u>	560 <u>880</u>
Chromium III	910	910	18,000	8,600	1,500	33,000
	6 <u>21</u>	6 <u>21</u>	1.8 <u>170</u>	33 <u>49</u>	7.7 <u>21</u>	220 250
Lead	200	310	80	2,300	<u>630</u>	1,300
Mercury (elemental)	1	1	26	26	16	26 ⁽⁰ [<i>30</i>]
Mercury (inorganic)	1/0	240	80	3600	120	240
Nickel	130 (10	180 (10	53 (11	980	230	800
Vanadium	410	1200	91	9000	2000	5000
	2400	/100	520	68000	12000	44000
ZINC Semi Metale and non-metale	3700	40000	620	730000	81000	170000
	20(12.07	25(12 40	42(12 40	G40 ⁽¹² C40	70 70	170 170
Arsenic	32 <u>37</u>	33 <u>40</u>	43 <u>49</u>	7500	79 <u>79</u> 1500	3300
Selenium	350	600	120	13000	1100	1800
Inorganic chemicals	550	000	120	15000	1100	1000
Cyanide	34	34	34	34	34	34
Organic contaminants						
Aliphatic risk banded hydrocarbons - TPHCWG method						
EC _{>5} - EC ₆	160	160	3900	12000	600000	180000
EC _{>6} - EC ₈	530	530	13000	40000	620000	320000
EC _{>8} - EC ₁₀	150	150	1700	11000	13000	21000
EC10-EC12	760	770	7300	47000	13000	24000
EC ₁₂ -EC ₁₆	4300	4400	13000	90000	13000	26000
EC _{>16} - EC ₃₅	110000	110000	270000	1800000	250000	490000
EC>35 - EC44	110000	110000	270000	1800000	250000	490000
Aromatic risk banded hydrocarbons - TPHCWG method						
$EC_{5} - EC_{7}$	300	1400	57	86000	56000	92000
EC>7 - EC8	660	3900	120	180000	56000	100000
EC _{>8} - EC ₁₀	190	270	51	17000	5000	9300
EC10 - EC12	380	1200	74	34000	5000	10000
EC12 - EC16	660	2500	130	38000	5000	10000
EC_16 - EC21	930	1900	260	28000	3800	7800
EC ₅₂₁ - EC ₃₅	1700	1900	1600	28000	3800	7900
EC>35 - EC44	1700	1900	1600	28000	3800	7900
Aliph + Arom EC >44-70	1900	1900	3000	28000	3800	7900
Aromatic	0.00.0.07	1000	0.07.0.10	05.00	70.440	110.000
Benzene	0.33 0.87	1.0 3.3	0.07 0.18	95 <u>98</u>	73 <u>140</u>	110 <u>230</u>
Ethyl benzene	350	840	90	2800 ^{(*} [66000]	2800 ^{(*} [25000]	2800 ^{(*} [27000]
Toluene	610	2700	120	4400 ^(o) [190000]	4400 ⁽⁰⁾ [56000]	4400 ^(*) [100000]
Xylene ^{\®}	230	290	160	2600 ^{(°} [32000]	2600 ^{(°} [<i>43000</i>]	2600 ^{(°} [<i>31000</i>]
Phenol	420	520	280	3200 ⁽¹⁴ (38000)	3200 ⁽¹⁴ (<i>10000</i>)	3200 ⁽¹⁴ (<i>9300</i>)
Polycyclic Aromatic Hydrocarbons (PAH)	10	10		1100	4000	0000
	13	13	24	100000	4900	3000
	920	6000	200	100000	15000	30000
Fluorene	860	4500	160	71000	9900	20000
Phenanthrene	440	1500	90	23000	3100	6300
Anthracene	11000	37000	2200	540000	74000	150000
Fluoranthene	890	1600	290	23000	3100	6400
Pyrene	2000	3800	620	54000	7400	15000
Benz(a)anthracene	13	15	13	180	29	62
Chrysene	27	32	19	350	57	120
Benzo(b)fluoranthene	3.7	4.0	3.9	45	7.2	16.0
Benzo(k)fluorantnene	100	110	130	1200	190	440
Benzo(a)pyrene	3.0 <u>5.0</u>	3.2 <u>3.3</u>	3.5 <u>5.7</u>	30 <u>77</u> 510	5.7 <u>10</u>	13 21
Dibenzo(ab)anthracene	41	40	39	36	0.58	1 1
Benzo(ghi)pervlene	350	360	640	4000	640	1600
Chlorinated Aliphatic Hydrocarbons	000		0.70		0.10	
Vinyl chloride	0.0014	0.0015	0.0018	0.12	3.5	5.4
Trichloroethene (TCE)	0.075	0.08	0.21	5.7	120	120
1,1,1,2 Tetrachlorethane	6.4	8.2	4.4	560	1400	2100
Tetrachlorethene (PCE)	0.90	0.92	3.6	95	1400	1500
11.1.1 Irichlorethane	39	40	240	3000	140000	100000

Notes 1. All values above are in mg/kg

2. Numbers in bold are SCVs or GAC that are derived based on SGV report input parameters, numbers in italics are S4ULs, numbers in bold-italics are based on EIC/AGS/CL:AIRE numbers & input parameters and underlined numbers are C4SLs

3. Soil organic matter (SOM) is assumed to be 6% - DEFAULT VALUE

4. Soil type is assumed to be sandy loam - DEFAULT SOIL TYPE

5. For residential, the building type is conservatively assumed to be a small terrace house where the development includes bungalows change to more conservative bungalow setting in computer model

6. For commercial, the building type is conservatively assumed to be a pre 1970s office building, where the proposed development comprises houses, flat with living spaces changes setting in model accordingly 7. For classrooms consider increasing the dust loading fator in the 'Soil and Building Data' of the CLEA 1.04 model from 50 to 100µg m⁻³

8. Based on vapour saturation limt as suggested by EA / [] model value

9. Lowest of o-, m- and p-xylene

10. Based on comparison of inhalation exposure with inhalation TDI

11. Based on comparison of oral, dermal, and inhalation exposure with the oral TDI

12. Based on a comparison of oral and dermal soil exposure with oral Index Dose only

13. Averaged over and based on lifetime exposure

14. Based on critical concentration for skin irritation in humans arising from contact with phenol in aqueous solution (number in brackets based on health effects following long term exposure for illustration)

15. NA: Not applicable

Adopted Soil Generic Assessment Criteria Sandy loam with 2.5% SOM



Contaminants	Residential with	Residential without	Allotments	Commercial	Public open space	Public park
	home grown	home grown			near residential	POSpark
	produce	produce			housing POS _{resi}	
Metals						
Beryllium	1.7	1.7	35	12	2.2	63
Boron	290	11,000	45	240,000	21,000	46,000
Cadmium	10 ⁽¹³ 22	85 ⁽¹³ 150	1.8 <u>3.9</u>	230 <u>410</u>	120 <u>220</u>	560 <u>880</u>
Chromium III	910	910	18.000	8.600	1.500	33.000
Chromium VI	6 21	6 21	1.8 170	33 49	7.7 21	220 250
Lead	200	310	80	2.300	630	1.300
						00(8100)
Mercury (elemental)	1	1	26	26	16	26 ⁽⁰ [<i>30</i>]
Mercury (inorganic)	170	240	80	3600	120	240
Nickel	130 ⁽¹⁰	180 ⁽¹⁰	53 ⁽¹¹	980 ⁽¹⁰	230	800
Vanadium	410	1200	91	9000	2000	5000
Copper	2400	7100	520	68000	12000	44000
Zinc	3700	40000	620	730000	81000	170000
Semi-Metals and non-metals						
Arsonic	30(12 27	35 ⁽¹² 40	13 ⁽¹² 10	640 ⁽¹² 640	79 79	170 170
Antimony	32 <u>37</u>	55 <u>40</u>	43 43	7500	1500	2200
Selenium	250	550	120	12000	1100	1900
	350	000	120	13000	1100	1000
Cyanida	34	24	34	34	34	34
Organic contaminants	34	54	54	54	54	34
Alinhatic risk handed bydrocarbons - TPHCWG method						
	70	70	1700	5000	500000	120000
	78	78	7700	5900	390000	130000
	230	230	5600	17000	610000	220000
$EC_{>8} - EC_{10}$	65	65	770	4800	13000	18000
EC ₁₀ -EC ₁₂	330	330	4400	23000	13000	23000
EC ₁₂ -EC ₁₆	2400	2400	13000	82000	13000	25000
EC>16 - EC35	92000	92000	270000	1700000	250000	480000
EC>35 - EC44	92000	92000	270000	1700000	250000	480000
Aromatic risk banded hydrocarbons - TPHCWG method						
	140	600	27	46000	56000	84000
	200	1000	£1	110000	56000	05000
$EO_{7} - EO_{8}$	290	1800	51	110000	56000	95000
$EC_{>8} - EC_{10}$	83	110	21	8100	5000	8500
EC ₁₀ - EC ₁₂	180	590	31	28000	5000	9700
EC12 - EC16	330	2300	57	37000	5100	10000
EC.16 - EC21	540	1900	110	28000	3800	7700
EC.21 - EC.25	1500	1900	820	28000	3800	7800
EC>25 - EC44	1500	1900	820	28000	3800	7800
- 33 - 44	1000			20000	0000	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
Aliph + Arom EC > 44-70	1800	1900	2100	28000	3800	7800
Aromatic	1000		2700	20000	0000	
Benzene	0.16	0.49	0.035	50	72	100
Ethyl bonzono	150	380	30	1200 ⁽⁸ [35000]	1200 ⁽⁸ [24000]	1200 ⁽⁸ [22000]
	130	1000	55	1200 [00000]	1200 [24000]	1200 [22000]
	270	1300	51	1900 [110000]	1900 [56000]	1900 ⁽⁸ [95000]
Xylene'	98	120	70	1200 ⁽⁰ [14000]	1200 ^(*) [42000]	1200° [23000]
Phenol	290	420	140	1500 ⁽¹⁴ (35000)	1500 ⁽¹⁴ (10000)	1500 ⁽¹⁴ (<i>8300</i>)
Polycyclic Aromatic Hydrocarbons (PAH)						
Naphthalene	5.6	5.6	10	460	4900	1900
Acenaphthylene	420	4600	69	97000	15000	30000
Acenaphthene	510	4700	85	97000	15000	30000
Fluorene	400	3800	67	68000	9900	20000
Phenanthrene	220	1500	38	22000	3100	6200
Anthracene	5400	35000	950	540000	74000	150000
Fluoranthene	560	1600	130	23000	3100	6300
Pyrene	1200	3800	270	54000	7400	15000
Benz(a)anthracene	11	14	6.5	170	29	56
Chrysene	22	31	9.4	350	57	110
Benzo(b)fluoranthene	3.3	4.0	2.1	44	7.2	15
Benzo(k)fluoranthene	93	110	75	1200	190	410
Benzo(a)pyrene	2.7	3.2	2	35	5.7	12
Indeno(123cd)pyrene	36	46	21	510	82	170
Dibenzo(ah)anthracene	0.28	0.32	0.27	3.6	0.57	1.3
Benzo(ghi)perylene	340	360	470	4000	640	1500
Chlorinated Aliphatic Hydrocarbons						
Vinyl chloride	0.00087	0.001	0.001	0.077	3.5	5
Trichloroethene (TCE)	0.034	0.036	0.091	2.6	120	91
1,1,1,2 Tetrachlorethane	2.8	3.5	1.9	250	1400	1800
Tetrachlorethene (PCE)	0.39	0.4	1.5	42	1400	1100
1.1.1 Trichlorethane	18	18	110	1300	140000	76000

Notes

1. All values above are in mg/kg

Numbers in bold ar SQVs or GAC that are derived based on SQV report input parameters, numbers in italics are S4ULs, numbers in bold-italics are based on EIC/AGS/CL:AIRE numbers & input parameters and underlined numbers are C4SLs
 Soil organic matter (SOM) is assumed to be 2.5% - DEFAULT VALUE

4. Soil type is assumed to be sandy loam - DEFAULT SOIL TYPE

5. For residential, the building type is conservatively assumed to be a small terrace house where the development includes bungalows change to more conservative bungalow setting in computer model

6. For commercial, the building type is conservatively assumed to be a pre 1970s office building, where the proposed development comprises houses, flat with living spaces changes setting in model accordingly

7. For classrooms consider increasing the dust loading fator in the 'Soil and Building Data' of the CLEA 1.04 model from 50 to 100µg m⁻³

8. Based on vapour saturation limt as suggested by EA / [] model value

9. Lowest of o-, m- and p-xylene

10. Based on comparison of inhalation exposure with inhalation TDI

11. Based on comparison of oral, dermal, and inhalation exposure with the oral TDI

12. Based on a comparison of oral and dermal soil exposure with oral Index Dose only

13. Averaged over and based on lifetime exposure

14. Based on critical concentration for skin irritation in humans arising from contact with phenol in aqueous solution (number in brackets based on health effects following long term exposure for illustration)

15. NA: Not applicable

Adopted Soil Generic Assessment Criteria Sandy loam with 1% SOM



Contaminants	Residential with	Residential without	Allotments	Commercial	Public open space	Public park
	home grown	home grown			near residential	POSpark
	produce	produce			housing POS _{resi}	
Metals						
Beryllium	1.7	1.7	35	12	2.2	63
Boron	290	11,000	45	240,000	21,000	46,000
Cadmium	10 ⁽¹³ 22	85 ⁽¹³ 150	1.8 <u>3.9</u>	230 <u>410</u>	120 <u>220</u>	560 <u>880</u>
Chromium III	910	910	18.000	8.600	1.500	33.000
Chromium VI	6 21	6 21	1.8 170	33 49	7.7 21	220 250
Lead	200	310	80	2,300	630	1,300
Mercury (elemental)	1	1	26	26	16	26 ⁽⁸ [30]
Mercury (inorganic)	170	240	80	3600	120	240
	170	240	50	3000	120	240
Nickel	130	180	53	980	230	800
Vanadium	410	1200	91	9000	2000	5000
Copper	2400	/100	520	68000	12000	44000
	3700	40000	620	730000	81000	170000
Semi-Metals and non-metals	(12)	(12)	(12	(12		
Arsenic	32 ⁽¹² <u>37</u>	35 ⁽¹² <u>40</u>	43 ⁽¹² <u>49</u>	640 ⁽¹² 640	<i>79</i> <u>79</u>	<i>170 <u>170</u></i>
Antimony		550		7500	1500	3300
Selenium	350	600	120	13000	1100	1800
Inorganic chemicals						
Cyanide	34	34	34	34	34	34
Organic contaminants						
Aliphatic risk banded hydrocarbons - TPHCWG method						
$EC_{>5} - EC_6$	42	42	730	3200	570000	95000
EC _{>6} - EC ₈	100	100	2300	7800	600000	150000
EC _{>8} - EC ₁₀	27	27	320	2000	13000	14000
EC10-EC12	130	130	2200	9700	13000	21000
EC12-EC16	1100	1100	11000	59000	13000	25000
FC to FCor	65000	65000	260000	160000	250000	450000
	65000	65000	260000	1600000	250000	450000
Aromatic risk handed hydrocarbons - TPHCWG method	03000	05000	200000	1000000	230000	430000
	70	270	10	00000	50000	70000
$EO_{5} - EO_{7}$	70	370	13	26000	56000	76000
$EC_{27} - EC_{8}$	130	860	22	56000	56000	87000
EC _{>8} - EC ₁₀	34	47	8.6	3500	5000	7200
EC ₁₀ - EC ₁₂	74	250	13	16000	5000	9200
EC12 - EC16	140	1800	23	36000	5100	10000
EC EC.	260	1900	46	28000	3800	7600
EC. 91 - EC.95	1100	1900	370	28000	3800	7800
FC>05 - FC	1100	1900	370	28000	3800	7800
	1100	1500	0/0	20000	0000	7000
Aliph + Arom EC >44-70	1600	1900	1200	28000	3800	7800
Aromatic	1000	1000	1200	20000	0000	1000
Benzene	0.08	0.3	0.017	28	72	90
Ethyl benzene	65	170	16	520 ⁽⁸ [17000]	520 ⁽⁸ [24000]	520 ⁽⁸ [17000]
Teluene	120	610	20	960 ⁽⁸ [50000]	960 ⁽⁸ [56000]	960 ⁽⁸ [97000]
	120	610	22	600 [59000]	600 [56000]	600 [87000]
Xylene [®]	41	53	28	480° [69000]	480 ^{••} [41000]	480 ⁽¹⁾ [17000]
Phenol	180	310	66	760 ⁽¹¹ (31000)	760 ⁽¹⁴ (10000)	760 ⁽¹⁴ (<i>7600</i>)
Polycyclic Aromatic Hydrocarbons (PAH)		0.0		100	4000	1000
Naphthalene	2.3	2.3	4.1	190	4900	1200
	170	2900	28	03000	15000	29000
Eluoropo	210	2000	34 97	62000	15000	20000
Phononthrono	170	2000	2/ 15	03000	3300	20000
Anthracana	95	1300	15	22000 520000	3100	150000
Elucronthono	2400	1500	380	220000	2100	6200
Purono	280	2700	52 110	23000	7400	15000
Fylelie Banz(a)anthragana	520	3700	20	170	7400	15000
Christian	1.2	20	2.9	250	29	49
Benzo(b)fluoranthene	10	30	4.1 0.00	230 21	71	55 13
Benzo(k)fluoranthene	2.0	110	37	1200	100	370
Bonzo(a)pyropo	20	20	0.07	25	57	11
	2.2	J.Z 15	0.57	50	0.7 po	150
Dibenzo(ab)anthracene	21	4J 0 21	9.0	3.5	0.57	1 1
Benzo(ahi)nervlene	0.24	360	0.14	3000	640	1.1
Chlorinated Alinhatic Hydrocarbons	520	000	230	0000	040	1700
Vinyl chloride	0.00064	0.00077	0.00055	0 050	35	4.8
Trichloroethene (TCE)	0.0004	0.00077	0.00000	12	120	70
1 1 1 2 Tetrachlorethane	12	15	0.79	110	1400	1500
Tetrachlorethene (PCE)	0.18	0.18	0.65	19	1400	810
1.1.1 Trichlorethane	88		48	660	140000	57000
.,.,.	5.0	0	.0			5.000

Notes

1. All values above are in mg/kg

2. Numbers in bold are SGVs or GAC that are derived based on SGV report input parameters, numbers in italics are S4ULs, numbers in bold-italics are based on EIC/AGS/CL:AIRE numbers & input parameters and underlined numbers are C4SLs

parameters and <u>underlined numbers are C4SLs</u>3. Soil organic matter (SOM) is assumed to be 1% - DEFAULT VALUE

4. Soil type is assumed to be sandy loam - DEFAULT SOIL TYPE

5. For residential, the building type is conservatively assumed to be a small terrace house where the development includes bungalows change to more conservative bungalow setting in computer model

6. For commercial, the building type is conservatively assumed to be a pre 1970s office building, where the proposed development comprises houses, flat with living spaces changes setting in model accordingly

7. For classrooms consider increasing the dust loading fator in the 'Soil and Building Data' of the CLEA 1.04 model from 50 to 100µg m⁻³

8. Based on vapour saturation limt as suggested by EA / [] model value

9. Lowest of o-, m- and p-xylene

10. Based on comparison of inhalation exposure with inhalation TDI

11. Based on comparison of oral, dermal, and inhalation exposure with the oral TDI

12. Based on a comparison of oral and dermal soil exposure with oral Index Dose only

13. Averaged over and based on lifetime exposure

14. Based on critical concentration for skin irritation in humans arising from contact with phenol in aqueous solution (number in brackets based on health effects following long term exposure for illustration)

15. NA: Not applicable