

APPENDIX D
Correspondence

Paul Rockliffe

From: anna.irwin@wrexham.gov.uk
Sent: 30 July 2008 17:35
To: prockliffe@shepherd-gilmour.co.uk
Cc: planning.wcbcpo.wcbcdom@wrexham.gov.uk
Subject: Wrexham Industrial Estate

Dear Sir,

Further to your recent enquiry, I can confirm that there are no listed buildings or Conservation Areas in the area defined on the map submitted.

My colleagues will comment in due course on the other matters raised.

Regards

Anna

Anna Irwin
Conservation Officer
Wrexham County Borough Council
01978 292531

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The Coal Authority

**Issued by:**

The Coal Authority, Mining Reports Office, 200 Lichfield Lane, Berry Hill, Mansfield, Nottinghamshire NG18 4RG
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Person dealing with this matter:	Simon Leeming
Our reference:	00052779-08
Your reference:	25963547
Electronic Ref:	EME_00010054710001_005
RRUID:	005.00010054710001
Date of your enquiry:	30 July 2008
Date we received your enquiry:	30 July 2008
Date of issue:	31 July 2008

This report is for the property described in the address below and the attached plan.

Coal and Brine Report

Land Adjacent To, Bryn Lane, Wrexham Industrial Estate, Wrexham, Clwyd

This report is based on and limited to the records held by, the Coal Authority, and the Cheshire Brine Subsidence Compensation Board's records, at the time we answer the search.

Coal mining	Yes
Brine extraction	No

Information from the Coal Authority

Underground Coal Mining

Past

According to the records in our possession, the property is not within the zone of likely physical influence on the surface from past underground workings.

Present

The property is not in the likely zone of influence of any present underground coal workings.

Future

The property is not in an area for which the Coal Authority is determining whether to grant a licence to remove coal using underground methods.

The property is not in an area for which a licence has been granted to remove coal using underground methods.

The property is not in an area that is likely to be affected at the surface from any planned future workings.

However reserves of coal exist in the local area which could be worked at some time in the future.

No notice of the risk of the land being affected by subsidence has been given under section 46 of the Coal Mining Subsidence Act 1991.

Mine entries

There are no known coal mine entries within, or within 20 metres of, the boundary of the property.

Coal-mining geology

At the surface, there are no known faults or other lines of weakness due to coal mining that have made the property unstable.

Opencast Coal Mining

Past

The property is not within the boundary of an opencast site from which coal has been removed by opencast methods.

Present

The property does not lie within 200 metres of the boundary of an opencast site from which coal is being removed by opencast methods.

Future

The property is not within 800 metres of the boundary of an opencast site for which the Coal Authority is determining whether to grant a licence to remove coal by opencast methods.

The property is not within 800 metres of the boundary of an opencast site for which a licence to remove coal by opencast methods has been granted.

Coal-mining subsidence

The Coal Authority has not received a damage notice or claim for the property since 1 January 1984. There is no current Stop Notice delaying the start of remedial works or repairs to the property.

The Coal Authority has not received a request to carry out preventive work before coal is worked under section 33 of the Coal Mining Subsidence Act 1991.

Mine gas

There is no record of a mine gas emission requiring action by the Coal Authority within the boundary of the property.

Hazards related to coal mining

The property has not been subject to remedial works, by or on behalf of the Authority, under its Emergency Surface Hazard Call Out procedures.

Withdrawal of Support

The property is not in an area for which a notice of entitlement to withdraw support has been published.

The property is not in an area for which a notice has been given under section 41 of the Coal Industry Act 1994, revoking the entitlement to withdraw support.

Working Facilities Orders

The property is not in an area for which an Order has been made under the provisions of the Mines (Working Facilities and Support) Acts 1923 and 1966 or any statutory modification or amendment thereof.

Payments to Owners of Former Copyhold Land

The property is not in an area for which a relevant notice has been published under the Coal Industry Act 1975/Coal Industry Act 1994.

Information from the Cheshire Brine Subsidence Compensation Board

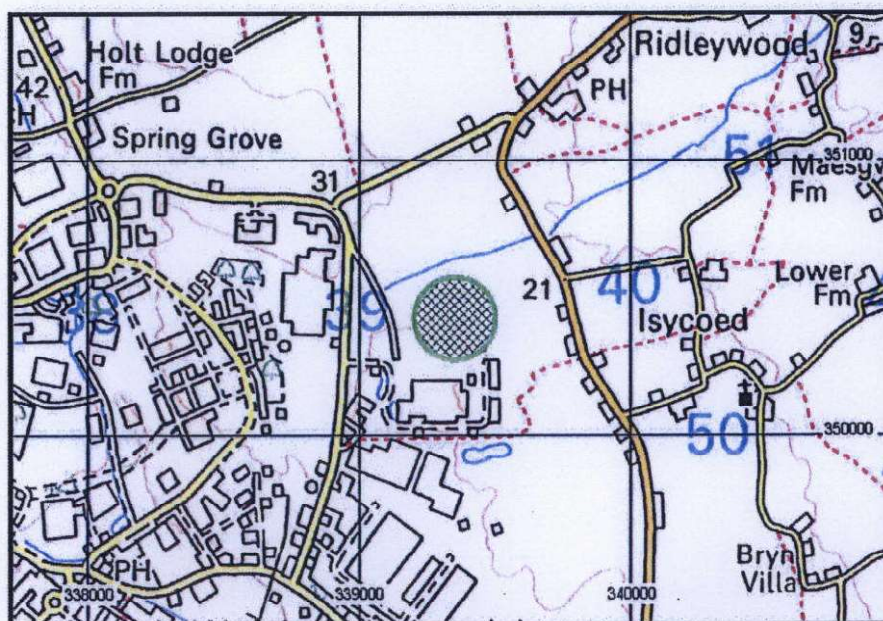
The property lies outside the Cheshire Brine Compensation District.

Additional remarks

This report is prepared in accordance with the Law Society's Guidance Notes 2006, the User Guide 2006 and the Coal Authority and Cheshire Brine Board's Terms and Conditions 2006. The report is compliant with Home Information Pack requirements.

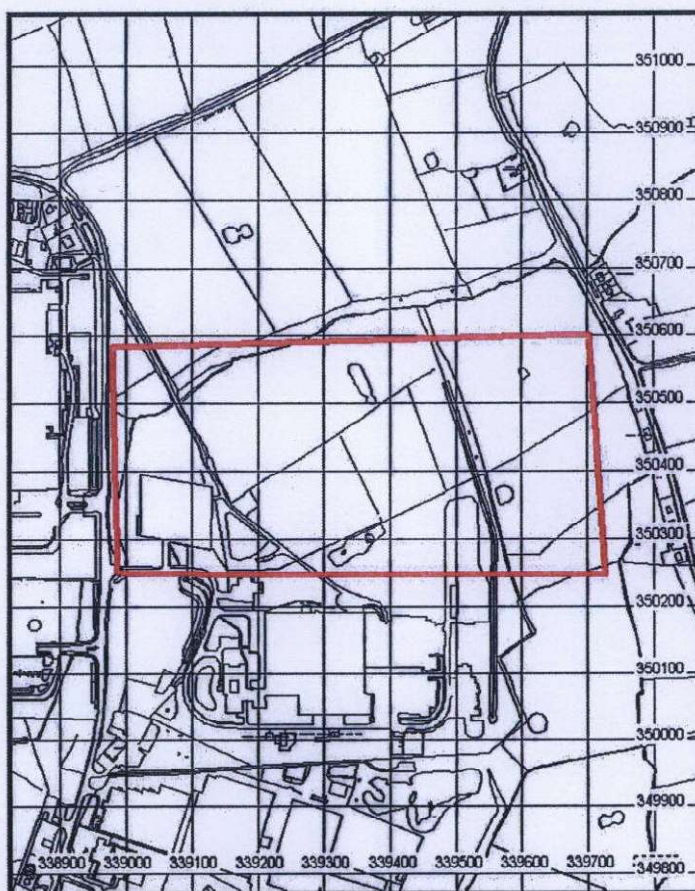
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Approximate
position
of property



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Approximate position of enquiry boundary shown



Chief Housing and Public Protection Office/Prif Swyddog Tai a Diogelu'r Cyhoedd
Andy Lewis

High Street, Ruabon, Wrexham. LL14 6NH
Stryd Fawr, Rhiwabon, Wrecsam. LL14 6NH
Fax/Ffacs: 01978 813709 BT Text Phone: 01978 292067
www.wrexham.gov.uk www.wrecsam.gov.uk



BY E-MAIL

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Shepherd Gilmour Environment Ltd
Castlefield House
29 Ellesmere Street
Manchester
M15 4LZ

Your Ref/Eich Cyf
Our Ref/Ein Cyf
Date/Dyddiad
Ask for/Gofynner am
Direct Dial/Rhif Union
E-mail/E-bost

EP 3063
SLI/Search346
30 July 2008
Stacey Inglis
01978 813724
stacey.inglis@wrexham.gov.uk

Visit our website at:
www.wrexham.gov.uk

Dear Mr Rockliffe

SITE AT WREXHAM INDUSTRIAL ESTATE, WREXHAM –NGR 339287 350145

Thank you for your e-mail dated 29th July 2008 and subsequent e-mail of 31st July 2008 confirming that you are willing to pay the fee for the above search. I can respond to your enquiry as follows.

Question 1

This Authority does not yet have a comprehensive database regarding historic land use or contamination, however, the limited information available to the Housing and Public Protection Department indicates that there is one closed landfill site within 250m of the search area.

The site is called 'B.I.C.C Cables Ltd' and is located approximately 160 metres south of the search area. The site is an unlicensed closed inert landfill site which is known to contain subsoil from excavations, builders waste and sludge from a cooling water pond.

EA Reference: 6955/0008

Date of Final Input: 31.12.1977

Grid Reference: 339270 349710

Boundaries: please refer to enclosed plan

Please note the above information is for guidance purposes only since it has been supplied by third parties (the EA) and therefore the sufficiency and/or accuracy of this information is not guaranteed or implied by the Council. The onus for checking the accuracy or sufficiency of it rests wholly with the person undertaking the works.

Question 2

There are no abstraction points within 250m of the study area boundary.

Question 3

Would you like to receive a copy of this information/correspondence in a different language or format (Braille, Audio Tape etc.)? If so, please contact Public Protection Services on 01978 813700 so arrangements can be made.

A hoffech chi dderbyn copi o'r wybodaeth/gohebiaeth hyn mewn iaith neu ddiwyg gwahanol (braille, tîp sain ac ati)? Os hoffech, yna cysylltwch â Gwasanaethau Diogelu'r Cyhoedd ar 01978 813700 fel y gellir gwneud trefniadau.



As previously stated this Authority does not yet have a comprehensive database of historic land uses or contamination. However, the limited information available to the Housing and Public Protection Department indicates that the site is on an area of land formerly used as 'Owens Corning Fibreglass Ltd' and is also adjacent to land formerly used by the MoD for the manufacture of explosives (this former use actually covers the majority of Wrexham Industrial Estate as it is today), both of which are industries that are potentially contaminative.

The limited records held by this Department associated with the former use of the adjacent land, are as follows:

- i. The Royal Ordnance Factory (ROF) was the largest explosives factory in the area.
- ii. The site covered an area over 1400 acres and was served by its own railway.
- iii. It became operational in 1941, about a year after the facility was constructed. It consisted of a number of production buildings, widely spaced to minimise any damage should an accidental explosion occur.
- iv. Two units were built for the manufacture of solventless cordite also known as Cordite W.
- v. Operation of the ROF ceased on 11 August 1945. Shortly after the war the site was sold for development as an Industrial Estate.
- vi. Cordite is produced by the incorporation of Nitrocellulose (NC (guncotton) with Nitroglycerine (NG) in the presence of a solvent to assist gelatinisation, although at Wrexham Carbamite was introduced as a suitable stabiliser instead of solvents. The cordite produced at Wrexham was 'flashless', produced by the inclusion of a large proportion of finely divided Nitroguanidine (Pircrite).
- vii. Further information of contamination issues associated with the manufacture of explosives is contained in the Environment Agency document 'Land Contamination: Technical Guidance on Special Sites: Explosive Manufacturing & Processing Sites' Research & Development Technical Report P5-042/TR/03, dated June 2001.

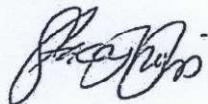
The former Department of Industry Profiles and CLR 8 identify historical munitions sites as sites that may have ground contamination, therefore the Council will be required to consider this site under its duties of implementing Part IIA of the Environmental Protection Act 1990.

The Council has not yet determined any sites as 'contaminated land' under Part IIA of the Environmental Protection Act 1990 and we are currently at the initial stages of implementing the contaminated land strategy. This work involves identifying all of the potential contaminated land sites in the County Borough for them to be prioritised before commencing with more site specific investigations. Potential contaminated land sites will be identified in the usual way that desk studies are carried out i.e. by checking historical maps and other sources of information to determine the potentially contaminative uses (such as those listed in the CLR8 and the (former) DOE Industry profiles). In light of the above information the above search area will be considered under Part IIA in the future, unfortunately as the Council does not yet have a list of prioritised sites for inspection under Part IIA it is impossible to advise you of a likely time when such an assessment may take place.

You may be interested to know that some sites on the Industrial Estate have had ground contamination issues assessed. These have mainly been the result of a planning condition requiring a contamination assessment for the development of the site. Some assessments have shown no contamination to have been present, whilst others have shown some contamination that has required remediation measures for its safe development. In many of these cases the contamination was not necessarily due to the sites former use by Royal Ordnance but by subsequent operations on the site or made ground.

Should you have any further queries please do not hesitate to contact me on the above number.
An invoice for £65 + VAT will be issued shortly.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S. Inglis', written in a cursive style.

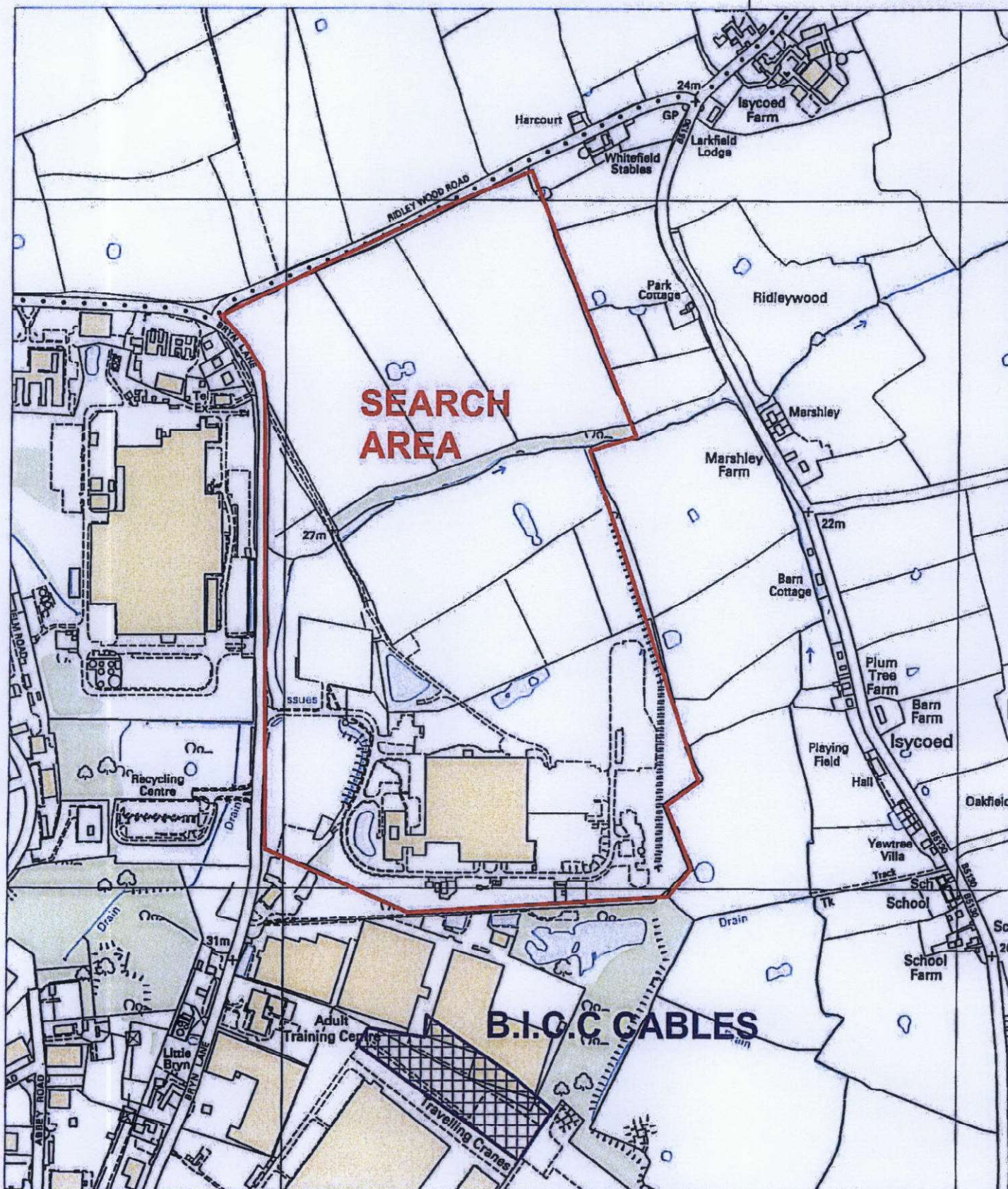
Mrs S. Inglis
Contaminated Land Officer

Enc.

Location of closed landfill known as 'B.I.C.C Cables Ltd'

04/08/2008

Scale 1: 7,500



APPENDIX H - DEFINITIONS OF TERMS USED IN QUALITATIVE AND QUANTITATIVE RISK ASSESSMENTS

CIRIA C552 Terminology

For the qualitative and quantitative assessment of risks posed by potential pollutant linkages have been undertaken using the risk matrix adapted from CIRIA C552 and outlined in the table below.

	Category	Definition
Potential severity	Severe	Acute (short term) risk to human health, Major pollution of sensitive controlled waters, ecosystems or habitat. Catastrophic damage to buildings or property or crops.
	Medium	Chronic (Medium / long term) risk to human health Pollution of sensitive controlled waters, ecosystems or species, Significant damage to crops, buildings or structures
	Mild	Easily preventable permanent health effects on humans. Pollution of non-sensitive controlled waters. Minor damage to buildings or structures.
	Minor	Easily preventable non-permanent health effects on humans, or no effects. Minor, low level and localised contamination of on-site soil. Easily repairable damage to buildings or structures.
Probability of risk	High Likelihood	Pollutant linkage may be present, and the risk is almost certain to occur , or there is evidence of harm already occurring.
	Likely	Pollutant linkage may be present, and it is probable that the risk will occur over the long term.
	Low Likelihood	Pollutant linkages may be present and there is a possibility of the risk occurring, although there is no certainty that it will do so.
	Unlikely	Pollutant linkage may be present but the circumstances under which harm would occur are improbable.

		Potential Severity			
		Severe	Medium	Mild	Minor
Probability of risk	High Likelihood	Very high risk	High risk	Moderate risk	Moderate / low risk
	Likely	High risk	Moderate risk	Moderate / low risk	Low risk
	Low Likelihood	Moderate risk	Moderate / low risk	Low risk	Very low risk
	Unlikely	Moderate / low risk	Low risk	very low risk	Very low risk

APPENDIX I - HUMAN HEALTH ASSESSEMENT CRITERIA

HUMAN HEALTH ASSESSMENT CRITERIA

Context

Contaminated Land is defined under law through Part IIA of the Environmental Protection Act 1990, implemented through Section 57 of the Environment Act 1995 and associated guidance ("Part IIA"). These specify that a "suitable for use" approach is to be applied in the assessment of potentially contaminated land, implemented through a phased programme of site investigation and risk assessment appropriate to the site under consideration.

The assessment of potential risks posed by contaminated land is based upon the assessment of plausible contaminant source - pathway - receptor linkages ("pollutant linkages") for the current and/or proposed future use of the site. The process for the assessment of contaminated land adopted in this report is in line with guidance issued by the Environment Agency Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)

Land contamination can harm:

- human health
- drinking water supplies, groundwater and surface water
- soils
- ecosystems including wildlife, animals and wetlands
- property

It can also affect the current and future land use. Dealing with land contamination helps make the environment clean and safe. Through regeneration it can:

- enhance the health and wellbeing of all
- add to the economic, ecological and amenity value of the area

Use land contamination risk management (LCRM) to:

- identify and assess if there is an unacceptable risk
- assess what remediation options are suitable to manage the risk
- plan and carry out remediation
- verify that remediation has worked

You can use LCRM in a range of regulatory and management contexts. For example, voluntary remediation, planning, assessing liabilities or under the Part 2A contaminated land regime. The Environment Agency expects you to follow LCRM if you are managing the risks from land contamination.

We support the use of the National Quality Mark Scheme (NQMS). You can use it for any type of land contamination report.

Using the NQMS:

- will make sure all legislative requirements and necessary standards related to managing land contamination are met
- can provide increased confidence by submitting reports of the quality we expect
- can result in cost and time savings by 'getting it right first time'

LCRM is made up of 4 guides.

1. LCRM: Before you start.
2. LCRM: Risk assessment.
3. LCRM: Options appraisal.
4. LCRM: Remediation and verification.

We use a staged risk based approach. There are 3 stages and each stage is broken down into tiers or steps.

Stage 1: Risk assessment

You will use a tiered approach to risk assessment. The 3 tiers are:

1. Preliminary risk assessment.
2. Generic quantitative risk assessment.
3. Detailed quantitative risk assessment.

Stage 1 includes information for intrusive site investigations.

Stage 2: Options appraisal

There are 3 steps to follow.

1. Identify feasible remediation options.
2. Do a detailed evaluation of options.
3. Select the final remediation option.

Stage 3: Remediation and verification

There are 4 steps to follow.

1. Develop a remediation strategy.
2. Remediate.
3. Produce a verification report.
4. Do long term monitoring and maintenance, if required

You must always start with a preliminary risk assessment.

The risk assessment stage is an iterative process. You can do the 3 tiers in order or progress from a preliminary risk assessment to a detailed quantitative risk assessment. As part of a generic or detailed quantitative risk assessment you will need to collect detailed information about the site. This is usually through an intrusive site investigation.

Depending on the level of risk or regulatory requirements, you can proceed from a preliminary risk assessment to the options appraisal stage. If you proceed direct to the options appraisal stage, you still need to collect the detailed site investigation information required by the generic and detailed quantitative risk assessments. This is to confirm that your approach is viable and acceptable.

Following the risk assessment stage, if you conclude that the risks are acceptable, with agreement from the relevant regulator, you can end the process.

If there are unacceptable risks then remediation or mitigation is required. Follow stages 2 and 3 in order.

In stage 2 options appraisal, you will:

- look at the most feasible options
- produce a shortlist of options
- use evaluation criteria to assess them
- select which ones are the most suitable to take forward to stage 3

In stage 3 remediation and verification, you will produce a remediation strategy, do the remediation and then produce a verification report.

You will decide at the options appraisal stage if long term monitoring and maintenance is the remediation option. You may need to do post-remediation monitoring for further verification.

The risk assessment and subsequent investigation, remediation and verification must address all potential sources of pollutants that may be present on the site (the "hazards"), all receptors that may be harmed by these (e.g., human health, controlled waters, ecological receptors) and the pathways by which the contamination may be transported from the contaminant source(s) to the receptor(s). This is defined within the conceptual model for the site, which represents the characteristics of the site in a form that shows the possible pollutant linkages. As further information becomes available (for example, through site investigation), so the conceptual model will be refined.

Remedial action can be specified at any phase within this assessment process to break the identified pollutant linkage in determining whether or not to undertake further assessment or to undertake remediation, the potential cost-savings arising from a more thorough assessment of the pollutant linkages and more tightly defined remedial strategy must be considered against the direct costs involved in the work and the time that this will take to execute and gain regulatory approval.

A different approach to the statistical appraisal of data is required depending on whether the assessment is being undertaken to assess land as Contaminated Land in accordance with the regulations or whether the assessment is to assess whether the site is suitable for new development in accordance with the Planning regime. The statistical approach to assessment is discussed further in CL:AIRE:2020 "Professional Guidance: Comparing Soil Contamination Data with a Critical Concentration".

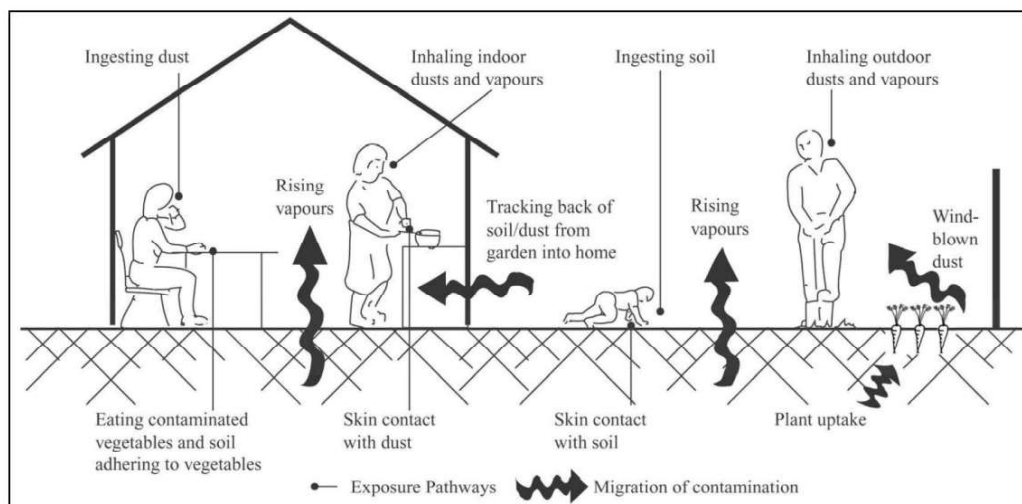
Some form of Detailed Quantitative Risk Assessment (DQRA) will be essential for those cases where appropriate GAC values cannot be established for the contaminant linkages under consideration.

Generic Assessment Criteria for Human Health Risk Assessment

In March 2002, the Department for Environment, Food and Rural Affairs (DEFRA) and the Environment Agency (EA) published the Contaminated Land Exposure Assessment (CLEA) Model and a series of related reports and guidance. These were designed to provide a scientifically based framework for the assessment of chronic risks to human health from contaminated land. The initial documents (CLR7 – 10) were withdrawn and replaced with revised guidance issued by the Environment Agency including:

- “Using Soil Guideline Values”; EA, 2009; [Land contamination: using soil guideline values \(SGVs\) - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/publications/using-soil-guideline-values)
- “Human Health toxicology assessment of contaminants in soil” EA, 2009; <https://www.gov.uk/government/publications/human-health-toxicological-assessment-of-contaminants-in-soil>
- “Update technical background to the CLEA model” 2009; <https://www.gov.uk/government/publications/updated-technical-background-to-the-clea-model>
- CLEA Software (Version 1.05) Handbook 2015; <https://www.gov.uk/government/publications/contaminated-land-exposure-assessment-clea-tool>
- Compilation of Data for priority Organic Contaminants for Derivation of Soil Guideline Values; Science Report SC050021/SR7, 2008; and,
- “Professional Guidance: Comparing Soil Contamination Data with a Critical Concentration”. CL:AIRE:2020 <https://www.claire.co.uk/component/phocadownload/category/9-other-cl-aire-documents?download=745:2020-stats-guidance>

The CLEA model and associated guidance was developed to calculate an estimated tolerable daily intake (TDI) of contaminants for site users given a set of ‘typical’ human health exposure pathways which are detailed in “SR3: Updated technical background to the CLEA model”



(Science Report SC050021/SR3, EA, 2009) and reproduced below.

Ingestion

- Outdoor soil;
- Indoor dust;
- Home grown produce;
- Soil attached to home grown produce.

Dermal Contact

- Outdoor soil;
- Indoor dust.

Inhalation

- Outdoor dust;
- Indoor dust;
- Outdoor vapour;
- Indoor vapour.

It should be noted that the CLEA model does not include an exhaustive list of potential exposure pathways, e.g. certain compounds can pass through plastic water pipes into drinking water supply.

The potential significance of each of the exposure pathways is dependent upon the type of land use and the nature of the contaminant being considered. The CLEA model considers principal 'default' land use scenarios and makes a series of assumptions with regards to building type (where applicable), identification of the critical human receptor group, exposure frequency and duration. The definitions of the principal land use types given in SR3 (EA, 2009) are:

Residential land use;

- A typical residential property consisting of a two-storey terraced house built on a ground-bearing slab of 0.15m thickness with a private garden consisting of lawn, flowerbeds, and a small fruit and vegetable patch. The occupants are assumed to be parents with young children, who make regular use of the garden. The critical receptor is a 0 – 6-year-old female.
- Active exposure pathway are ingestion of outdoor soil, ingestion of indoor dust, ingestion of home grown produce and soil adhering to home grown produce; direct dermal contact with outdoor soil and indoor dust; inhalation of outdoor dust and vapour and indoor dust and vapour

Allotments

- A plot of open space commonly made available by the Local Authority to tenants to grow fruit and vegetables for their own consumption. There are usually several plots to a site and the overall site area may cover more than one hectare. The tenants are assumed to be the parents or grandparents and that young children make occasional accompanied visits to the plots. The critical receptor is a 0 – 6-year-old female and there is no building present on Site.
- Active exposure pathways are ingestion of outdoor soil, ingestion of home grown produce and soil adhering to home grown produce; direct dermal contact with outdoor soil; inhalation of outdoor vapour.

Commercial and industrial land use.

- A typical commercial or light industrial property consisting of a three-story office building (pre-1970) with a ground bearing floor slab at which employees spend most time indoors and are involved in office based or related light physical work. The critical receptor is a working female adult aged 16 – 65 years.
- Active exposure pathway is ingestion of outdoor soil, ingestion of indoor dust; direct dermal contact with outdoor soil and indoor dust; inhalation of outdoor dust and vapour and inhalation of indoor dust and vapour.

Soil Guideline Values

Based on the assumption of each land use type, the EA and DEFRA developed and published Soil Guideline Value (SGV) using the CLEA model for a number of principal contaminants and 'default' end-use scenarios of residential, allotments and commercial/industrial use. The primary purpose of the SGVs are as trigger value for the tolerable daily intake (TDI), below which it can be assumed that the soil does not pose an unacceptable risk to the identified receptor. Where soils contamination is present above this level further assessment may be required. SGVs were developed for the following contaminants:

- Heavy metals and other inorganic compounds: arsenic, cadmium, chromium, cyanide, lead (now withdrawn), mercury, nickel and selenium.
- Benzene, ethylbenzene, toluene and xylenes.
- Phenol.
- Dioxins and dioxin-like polychlorinated biphenyls (PCBs)
- Polycyclic aromatic hydrocarbons (PAHs) – 11 substances

LQM/CIEH Generic Assessment Criteria for Human Health Risk Assessment

In addition, in 2009 CIEH through LQM and EIC published generic assessment criteria (GACs) for 82 substances including metals, petroleum hydrocarbons, PAHs and explosive substances for a variety of soil types and the three 'default' land uses – (residential, allotments and commercial end-uses) as described in SR3 (EA, 2009). These have been superseded as described below.

Category 4 Screening Values

In 2013 "SP1010: Development of Category 4 Screening Levels for Assessment of Land Affected by Contamination" (CL:AIRE 2013) was issued which detailed findings of a research project undertaken by CL:AIRE to set out the framework by which potential Category 4 Screening Levels (pC4SL) may be derived for 6 contaminants of concern, Arsenic, Benzene, Benzo(a)pyrene, Cadmium, Chromium VI and Lead.

This was supplemented in 2014 by "SP1010: Development of Category 4 Screening Levels for the Assessment of Land Affected by Contamination – Policy Companion Document" (DEFRA, 2014). SP1010 proposed several updated toxicology information relating to contaminant behaviour updated assumptions relating to the modelling of human exposure to soil contaminants, derivation of separate C4SLs for residential with the consumption of home grown produce, residential without the consumption of home grown produce, and two new land uses: public open spaces near residential housing (POS resi) and public parks (POS park).

Public Open Space: Residential

- For public open space in close proximity to residential housing and the central green area around which houses are located, as on many housing estates from the 1930s to 1970s. It is also applicable for smaller areas commonly incorporated in newer developments as informal grassed areas or more formal landscaped areas with a mixture of open space and covered soil with planting. It is considered to be a generally grassed area up to 0.5ha with up to 50% bare soil. The land use is an important resource

for children and the area is near the homes. The critical receptor is a female child age >3 - <9 years old (CLEA age class 4 – 9) as younger children are unlikely to play outdoors unsupervised.

- Active exposure pathways are ingestion of outdoor soil; ingestion of indoor dust; direct dermal contact with outdoor soil and indoor soil derived dust; inhalation of outdoor and indoor dust and inhalation of outdoor vapour.

Public Open Space: Park

- A public park is defined as an area of open space provided for recreational use and usually owned and maintained by the Local Authority. It is anticipated the park could be used for a wide range of activities, including the following:
 - Family visits and picnics;
 - Children's play area;
 - Sporting activities such as football on an informal basis (i.e. no a dedicated sports pitch); and
 - Dog walking.
- The park is modelled as an area >0.5 ha of predominantly grasses open space with no more than 25% of exposed soil.
- The critical receptor is a female child with CLEA age classes 1 – 6.
- Active exposure pathway are: ingestion of outdoor soil; direct dermal contact with outdoor soil; inhalation of outdoor dust and inhalation of outdoor vapour.

Furthermore, the C4SLs are based on a different toxicological benchmark, the 'low level of toxicological concern' (LLTC). This difference in approach was adopted because the C4SLs were primarily intended for use under Part 2A of the EPA 1990 to quickly screen out Category 4 sites where there is "*no risk or that the level of risk posed is low*". SGVs and LQM GACs are based on the more conservative 'minimal or tolerable level of risk' as defined in SR2 (EA, 2009) and were derived for assessment of contamination for the Planning process.

LQM/CIEH Suitable 4 Use Levels (S4ULs)

The publication of the C4SLs resulted in considerable and inconclusive debate about the applicability of the lower level of protection of the C4SL, which are underlain by the LLTC, outside of the Part 2A context for which they were derived. In 2014 LQM/CIEH presented a Suitable 4 Use Levels (S4ULs), which incorporate the updated assumption exposure derived for the production of the C4SLs but within the context of deriving screening criteria above which further assessment of the risks or remedial action may be needed. The S4ULs replace the 82 substances, species and fractions and congeners contained in the previous LQM/CIEH GACs issued in 2009. Additionally, following changes and new land uses proposed in the C4SL research project, S4ULs have also been derived for the majority of substances for which the EA derived SGVs in 2009 with the exception of lead (see below).

Lead

The C4SL for lead provides a technically robust and conservative assessment tool using significantly updated toxicological modelling than the withdrawn SGV and derived in line with current science of lead toxicology.

EIC/AGS/CL:AIRE Soil Generic Assessment Criteria (2010)

In some instances, EIC/AGS/CL:AIRE GACs for certain VOC / SVOC potential contaminants of concern have been used *in lieu* of available LQM / CIEH S4UL values.

Parameter	Residential with homegrown produce			Residential without homegrown produce			Allotment			Commercial / Industrial			Public Open Space near Residential			Public Open Space - Park			Source
	(mg/kg, unless otherwise stated)			(mg/kg, unless otherwise stated)			(mg/kg, unless otherwise stated)			(mg/kg, unless otherwise stated)			(mg/kg, unless otherwise stated)						
	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%				
SOM																			
Metals/metalloids																			
Arsenic		37			40			43			640			79			170	LQM (2014)	
Beryllium		1.7			1.7			35			12			2.2			63	LQM (2014)	
Boron		290			11000			45			240000			21000			46000	LQM (2014)	
Cadmium		11			85			1.9			190			120			532	LQM (2014)	
Chromium III		910			910			18000			8600			1500			33000	LQM (2014)	
Chromium VI		6			6			1.8			33			7.7			220	LQM (2014)	
Copper		2400			7100			520			68000			12000			44000	LQM (2014)	
Lead		200			310			80			2330			630			1300	C4SL	
Mercury (elemental)		1.2			1.2			21			58 (25.8)			16			30 (25.8)	LQM (2014)	
Mercury (Inorganic)		40			56			19			1100			120			240	LQM (2014)	
Methylmercury		11			15			6			320			40			68	LQM (2014)	
Nickel		180			180			230			980			230			3400	LQM (2014)	
Selenium		250			430			88			12000			1100			1800	LQM (2014)	
Vanadium		410			1200			91			9000			2000			5000	LQM (2014)	

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	(mg/kg, unless otherwise stated)			(mg/kg, unless otherwise stated)			(mg/kg, unless otherwise stated)			(mg/kg, unless otherwise stated)			(mg/kg, unless otherwise stated)						
SOM	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	
Zinc	3700			40000			620			730000			81000			170000			LQM (2014)
Other																			
Total Sulphate	2,400			2,400			2,400			2,400			2,400			2,400			BRE (2005)
Water Soluble Sulphate (g/l)	0.5			0.5			0.5			0.5			0.5			0.5			BRE (2005)
PAHs																			
Acenaphthene	210	510	1100	3000 (57)	4700(141)	6000 (336)	34	85	200	84000 (57)	97000 (141)	100000	15000	15000	15000	29000	30000	30000	LQM (2014)
Acenaphthylene	170	420	920	2900 (86.1)	4600 (212)	6000 (506)	28	69	160	8300 (86.1)	97000 (212)	100000	15000	15000	15000	29000	30000	30000	LQM (2014)
Anthracene	2400	5400	11000	31000 (1.17)	35000	37000	380	950	2200	520000	540000	540000	74000	74000	74000	150000	150000	150000	LQM (2014)
Benzo(a)anthracene	7.2	11	13	11	14	15	2.9	6.5	13	170	170	180	29	29	29	49	56	62	LQM (2014)
Benzo(a)pyrene	2.2	2.7	3	3.2	3.2	3.2	0.97	2	3.5	35	35	36	5.7	5.7	5.7	11	12	13	LQM (2014)
Benzo(b)fluoranthene	2.6	3.3	3.7	3.9	4	4	0.99	2.1	3.9	44	44	45	7.1	7.1	7.1	13	15	16	LQM (2014)
Benzo(g,h,i)perylene	320	340	350	360	360	360	290	470	640	3900	4000	4000	640	640	640	1400	1500	1600	LQM (2014)
Benzo(k)fluoranthene	77	93	100	110	110	110	37	75	130	1200	1200	1200	190	190	190	370	410	440	LQM (2014)
Chrysene	15	22	27	30	31	32	4.1	9.4	19	350	350	350	57	57	57	93	110	120	LQM (2014)

Parameter	Residential with homegrown produce			Residential without homegrown produce			Allotment			Commercial / Industrial			Public Open Space near Residential			Public Open Space - Park			Source
	(mg/kg, unless otherwise stated)			(mg/kg, unless otherwise stated)			(mg/kg, unless otherwise stated)			(mg/kg, unless otherwise stated)			(mg/kg, unless otherwise stated)			(mg/kg, unless otherwise stated)			
	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	
SOM	0.24	0.28	0.3	0.31	0.32	0.32	0.14	0.27	0.61	3.5	3.6	3.6	0.57	0.57	0.58	1.1	1.3	1.4	LQM (2014)
Fluoranthene	280	560	890	1500	1600	1600	52	130	290	23000	23000	23000	3100	3100	3100	63	6300	6400	LQM (2014)
Fluorene	170	400	860	2800 (30.9)	3800 (76.5)	4500 (183)	27	67	160	63000 (30.9)	68000	71000	9900	9900	9900	20000	20000	20000	LQM (2014)
Indeno(1,2,3-cd)pyrene	27	36	41	45	46	46	9.5	21	39	500	510	510	82	82	82	150	170	180	LQM (2014)
Naphthalene	2.3	5.6	13	2.3	5.6	13	4.1	10	24	190 (76.4)	460 (183)	1100 (432)	4900	4900	4900	1200 (76.4)	1900 (183)	3000	LQM (2014)
Phenanthrene	95	220	440	1300 (36)	1500	1500	15	38	90	22000	22000	23000	3100	3100	3100	6200	6200	6300	LQM (2014)
Pyrene	620	1200	2000	3700	3800	3800	110	270	620	54000	54000	54000	7400	7400	7400	15000	15000	15000	LQM (2014)
Coal Tar (BaP as surrogate marker)	0.79	0.98	1.1	1.2	1.2	1.2	0.32	0.67	1.2	15	15	15	2.2	2.2	2.2	4.4	4.7	4.8	LQM (2014)
BTEX and TPH																			
Benzene	0.087	0.17	0.37	0.38	0.7	1.4	0.017	0.034	0.075	27	47	90	72	72	73	90	100	110	LQM (2014)
Toluene	130	290	660	880 vap (869)	1900	3900	22	51	120	56000 vap (869)	110000 vap (1920)	180000 vap (4360)	56000	56000	56000	87000 vap (869)	95000 vap (1920)	100000 vap (4360)	LQM (2014)
Ethylbenzene	47	110	260	83	190	440	16	39	91	5700 vap (518)	13000 vap (1220)	27000 vap (2840)	24000	24000	25000	17000 vap (518)	22000 vap (1220)	27000 vap (2840)	LQM (2014)
Xylene - o	60	140	330	88	210	480	28	67	160	6600 (478)	15000 (1120)	33000 (2620)	41000	42000	43000	17000 (478)	24000 (1120)	33000 (2620)	LQM (2014)

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	(mg/kg, unless otherwise stated)				(mg/kg, unless otherwise stated)				(mg/kg, unless otherwise stated)				(mg/kg, unless otherwise stated)				(mg/kg, unless otherwise stated)				(mg/kg, unless otherwise stated)				
SOM	1%	2.50%	6%		1%	2.50%	6%		1%	2.50%	6%		1%	2.50%	6%		1%	2.50%	6%		1%	2.50%	6%		
Xylene - m	59	140	320		82	190	450		31	74	170		6200 (625)	14000 (1470)	31000 (3460)		41000	42000	43000		17000 (625)	24000 (1470)	32000 (3460)	LQM (2014)	
Xylene - p	56	130	310		79	180	430		29	69	160		5900 (576)	14000 (1350)	30000 (3170)		41000	42000	43000		17000 (576)	23000 (1350)	31000 (3170)	LQM (2014)	
Aliphatic EC 5-6	42	78	160		42	78	160		730	1700	3900		3200 (304)	5900 (558)	12000 (1150)		570000 (304)	590000	600000		95000 (304)	130000 (558)	180000 (1150)	LQM (2014)	
Aliphatic EC >6-8	100	230	530		100	230	530		2300	5600	13000		7800 (144)	17000 (322)	40000 (736)		600000	610000	620000		150000 (144)	220000 (322)	320000 (736)	LQM (2014)	
Aliphatic EC >8-10	27	65	150		27	65	150		320	770	1700		2000 (78)	4800 (190)	11000 (451)		13000	13000	13000		14000 (78)	18000 (190)	21000 (451)	LQM (2014)	
Aliphatic EC >10-12	130 (48)	330 (118)	760 (283)		130 (48)	330 (118)	760 (283)		2200	4400	7300		9700 (48)	23000 (118)	47000 (283)		13000	13000	13000		21000 (48)	23000 (118)	24000 (283)	LQM (2014)	
Aliphatic EC >12-16	1100 (24)	2400 (59)	4300 (142)		1100 (24)	2400 (59)	4300 (142)		11000	13000	13000		59000 (24)	82000 (59)	90000 (142)		13000	13000	13000		25000 (24)	25000 (59)	26000 (142)	LQM (2014)	
Aliphatic EC >16-35	65000 (8.48)	92000 (21)	110000		65000 (8.48)	92000 (21)	110000		260000	270000	270000		1600000	1700000	1800000		250000	250000	250000		450000	480000	490000	LQM (2014)	
Aliphatic EC >35-44	65000 (8.48)	92000 (21)	110000		65000 (8.48)	92000 (21)	110000		260000	270000	270000		1600000	1700000	1800000		250000	250000	250000		450000	480000	490000	LQM (2014)	
Aromatic EC 5-7	70	140	300		370	690	1400		13	27	57		26000 (1220)	46000 (2260)	86000 (4710)		56000	56000	56000		76000 (1220)	84000 (2260)	92000 (4710)	LQM (2014)	
Aromatic EC >7-8	130	290	660		860	1800	3900		22	51	120		56000 (869)	110000 (1920)	180000 (4360)		56000	56000	56000		87000 (869)	95000 (1920)	100000 (4360)	LQM (2014)	
Aromatic EC >8-10	34	83	190		47	110	270		8.6	21	51		3500 (613)	8100 (1500)	17000 (3580)		5000	5000	5000		7200 (613)	8500 (1500)	9300 (3580)	LQM (2014)	
Aromatic EC >10-12	74	180	380		250	590	1200		13	31	74		16000 (364)	28000 (899)	34000 (2150)		5000	5000	5000		9200 (364)	9700 (899)	10000 (2150)	LQM (2014)	

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	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	
SOM	140	330	660	1800	2300 (419)	2500	23	27	130	36000 (169)	37000	38000	5100	5100	5000	10000	10000	10000	LQM (2014)
Aromatic EC >12-16	260	540	930	1900	1900	1900	46	110	260	28000	28000	28000	3800	3800	3800	7600	7700	7800	LQM (2014)
Aromatic EC >21-35	1100	1500	1700	1900	1900	1900	370	820	1600	28000	28000	28000	3800	3800	3800	7800	7800	7900	LQM (2014)
Aromatic EC >35-44	1100	1500	1700	1900	1900	1900	370	820	1600	28000	28000	28000	3800	3800	3800	7800	7800	7900	LQM (2014)
Aromatic EC >44-75	1600	1800	1900	1900	1900	1900	1200	2100	3000	28000	28000	28000	3800	3800	3800	7800	7800	7900	LQM (2014)
VOCs																			
1,2-dichloroethane (1,2-DCA)	0.0071	0.011	0.019	0.0092	0.013	0.023	0.0046	0.0083	0.016	0.67	0.97	1.7	29	29	29	21	24	28	LQM (2014)
1,1,1-trichloroethane	8.8	18	39	9	18	40	48	110	240	660	1300	3000	140000	140000	140000	57000 (1425)	76000 (2915)	100000 (6392)	LQM (2014)
1,1,2,2,tetrachloroethane	1.6	3.4	7.5	3.9	8	17	0.41	0.89	2	270	550	1100	1400	1400	1400	1800	2100	2300	LQM (2014)
tetrachloroethene	0.18	0.39	0.9	0.18	0.4	0.92	0.65	1.5	3.6	19	45	95	1400	1400	1400	810 (424)	1100 (951)	1500	LQM (2014)
tetrachloromethane (Carbon tetrachloride)	0.026	0.056	0.13	0.026	0.056	0.13	0.45	1	2.4	2.9	6.3	14	890	920	950	190	270	400	LQM (2014)
Trichloroethene	0.016	0.034	0.075	0.017	0.036	0.08	0.041	0.091	0.21	1.2	2.6	5.7	120	120	120	70	91	120	LQM (2014)
Trichloromethane (chloroform)	0.91	1.7	3.4	1.2	2.1	4.2	0.42	0.83	1.7	99	170	350	2500	2500	2500	2600	2800	3100	LQM (2014)

Parameter	Residential with homegrown produce				Residential without homegrown produce				Allotment				Commercial / Industrial				Public Open Space near Residential				Public Open Space - Park				Source
	(mg/kg, unless otherwise stated)				(mg/kg, unless otherwise stated)				(mg/kg, unless otherwise stated)				(mg/kg, unless otherwise stated)				(mg/kg, unless otherwise stated)				(mg/kg, unless otherwise stated)				
	1%	2.50%	6%		1%	2.50%	6%		1%	2.50%	6%		1%	2.50%	6%		1%	2.50%	6%		1%	2.50%	6%		
SOM	0.0006 4	0.0008 7	0.0014		0.0007 7	0.001	0.0015		0.0005 5	0.001	0.0018		0.059	0.077	0.12		3.5	3.5	3.5		4.8	5	5.4	LQM (2014)	
2,4,6 Trinitrotoluene (TNT)	1.6	3.7	8.1		65	66	66		0.24	0.58	1.4		1000	1000	1000		130	130	130		260	270	270	LQM (2014)	
RDX	120	250	540		13000	13000	13000		17	38	85		210000	210000	210000		26000	26000	27000		49000 (18.7)	51000	53000	LQM (2014)	
HMX	5.7	13	26		6700	6700	6700		0.86	1.9	3.9		110000	110000	110000		13000	13000	13000		23000 (0.35)	23000 (0.39)	24000 (0.48)	LQM (2014)	
Aldrin	5.7	6.6	7.1		7.3	7.4	7.5		3.2	6.1	9.6		170	170	170		18	18	18		30	31	31	LQM (2014)	
Dieldrin	0.97	2	3.5		7	7.3	7.4		0.17	0.41	0.96		170	170	170		18	18	18		30	30	31	LQM (2014)	
Atrazine	3.3	7.6	17.4		610	620	620		0.5	1.2	2.7		9300	9400	9400		1200	1200	1200		2300	2400	2400	LQM (2014)	
Dichlovos	0.032	0.066	0.014		6.4	6.5	6.6		0.0049	0.01	0.022		140	140	140		16	16	16		26	26	27	LQM (2014)	
Alpha-Endosulfan	7.4	18	41		160 (0.003)	280 (0.007)	410 (0.016)		1.2	2.9	6.8		5600 (0.003)	7400 (0.007)	8400 (0.016)		1200	1200	1200		2400	2400	2500	LQM (2014)	
alpha-Hexachlorocyclohexane	0.23	0.55	1.2		6.9	9.2	11		0.035	0.087	0.21		170	180	180		24	24	24		47	48	48	LQM (2014)	
beta-hexachlorocyclohexanes	0.085	0.2	0.46		3.7	3.8	3.8		0.013	0.032	0.077		65	65	65		8.1	8.1	8.1		15	15	16	LQM (2014)	
gamma-hexachlorocyclohexanes	0.06	0.14	0.33		2.9	3.3	3.5		0.0092	0.023	0.054		67	69	70		8.2	8.2	8.2		14	15	15	LQM (2014)	

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	1%	2.50%	6%		1%	2.50%	6%		1%	2.50%	6%		1%	2.50%	6%		1%	2.50%	6%		1%	2.50%	6%		
Chlorobenzene	0.46	1	2.4		0.46	1	2.4		5.9	14	32		56	130	290		11000	13000	14000		1300	2000	2900		LQM (2014)
1,2-Dichlorobenzene	23	55	130		24	57	130		94	230	540		2000 (571)	4800 (1370)	11000 (3240)		90000	95000	98000		24000 (571)	36000 (1370)	51000 (3240)		LQM (2014)
1,3-Dichlorobenzene	0.4	1	2.3		0.44	1.1	2.5		0.25	0.6	1.5		30	73	170		300	300	300		390	440	470		LQM (2014)
1,4-Dichlorobenzene	61	150	350		61	150	350		15	37	88		4400 (224)	10000 (540)	25000 (1280)		17000	17000	17000		36000 (224)	36000 (540)	36000 (1280)		LQM (2014)
VOCs Continued																									
1,2,3-Trichlorobenzene	1.5	3.6	8.6		1.5	3.7	8.8		4.7	12	28		102	250	590		1800	1800	1800		770 (134)	1100 (330)	1600 (789)		LQM (2014)
1,2,4-Trichlorobenzene	2.6	6.4	15		2.6	6.4	15		55	140	320		220	530	1300		15000	17000	19000		1700 (318)	2600 (786)	4000 (1880)		LQM (2014)
1,3,5-Trichlorobenzene	0.33	0.81	1.9		0.33	0.81	1.9		4.7	12	28		23	55	130		1700	1700	1800		380 (36.7)	580 (90.8)	860 (217)		LQM (2014)
1,2,3,4-Tetrachlorobenzene	15	36	78		24	56	120		4.4	11	26		1700 (122)	3080 (304)	4400 (728)		830	830	830		1500 (122)	1600	1600		LQM (2014)
1,2,3,5-Tetrachlorobenzene	0.66	1.6	3.7		0.75	1.9	4.3		0.38	0.9	2.2		49 (39.4)	120 (98.1)	240 (235)		78	79	79		110 (39)	120	130		LQM (2014)
1,2,4,5-Tetrachlorobenzene	0.33	0.77	1.6		0.73	1.7	3.5		0.06	0.16	0.37		42 (19.7)	72 (49.1)	96		13	13	13		25	26	26		LQM (2014)
Pentachlorobenzene	5.8	12	22		19	30	38		1.2	3.1	7		640 (43)	770 (107)	830		100	100	100		190	190	190		LQM (2014)

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SOM	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	1%	2.50%	6%	
Hexachlorobenzene	1.8 (0.2)	3.3 (0.5)	4.9	4.1 (0.2)	5.7 (0.5)	6.7 (1.2)	0.47	1.1	2.5	110 (0.2)	120	120	16	16	16	30	30	30	LQM (2014)
Phenol	280	550	1100	750	1300	2300	66	140	280	760 dir (31000)	1500 dir (35000)	3200 dir (37000)	760 dir (31000)	1500 dir (35000)	3200 dir (37000)	760 dir (31000)	1500 dir (35000)	3200 dir (37000)	LQM (2014)
Chlorophenols (excluding pentachlorophenol)	0.87 (g)	2	4.5	94	150	210	0.13 (g)	0.3	0.7	3500	4000	4300	620	620	620	1100	1100	1100	LQM (2014)
Pentachlorophenol	0.22	0.52	1.2	27 (16.4)	29	31	0.03	0.08	0.19	400	400	400	60	60	60	110	120	120	LQM (2014)
Carbon Disulphide	0.14	0.29	0.62	0.14	0.29	0.62	4.8	10	23	11	22	47	11000	11000	12000	1300	1900	2700	LQM (2014)
Hexachlorobutadiene	0.29	0.7	1.6	0.32	0.78	1.8	0.25	0.61	1.4	31	66	120	25	25	25	48	50	51	LQM (2014)

(g) derived based on 2,3,4,6-tetrachlorophenol; dir - based on a threshold protective of direct skin contact with phenol (guideline in brackets based on health effects following long term exposure provided for illustration only); (vap) calculated for vapour phase only, SOM – Soil Organic Matter; (4.5) solubility.

APPENDIX J - ASSESSMENT CRITERIA APPLIED FOR GROUND GAS

Ground Gas Monitoring Methodology

Monitoring for the following is generally performed as part of ground gas assessment:

- Methane (CH₄): an odourless, flammable gas. Mixtures of methane with air containing between 5 and 15% v/v methane are explosive.
- Carbon dioxide (CO₂): an asphyxiant at elevated concentrations. Denser than air, it can accumulate in excavations, and within low points inside buildings
- Oxygen (O₂): important in the assessment of the potential formation of explosive mixtures with methane. Monitoring normally measures both methane and oxygen concentrations in ground gas to derive an indication of the risk of explosive mixture formation, expressed as a percentage of the Lower Explosive Limit (LEL). Low concentrations of oxygen in ground gas can also exacerbate the risk of CO₂ asphyxiation.
- Hydrogen sulphide (H₂S): odorous and toxic, capable of forming flammable mixtures with air.

In addition, depending on the Conceptual Site Model, monitoring may also include for measurements of Volatile Organic Compounds (VOCs); present as chemical contaminants of soil and sometimes also biologically produced in low concentrations.

Assessment of methane (CH₄) and carbon dioxide (CO₂)

Methane and carbon dioxide can arise from natural geological sources, mine workings, rotting organic matter (peat, landfilled materials, etc.) and/or contaminant biodegradation. Assessment of ground gas composition and flows is therefore an essential part of site assessment. The need to adequately address potential risks from ground gas on development sites is therefore required under the planning regime.

In order to appropriately assess the site risks, the Construction Industry Research and Information Association (CIRIA) and others have issued several guidance documents on landfill and ground gas that are intended to provide advice on how to investigate and deal with gas contaminated ground with respect to development. These are:

- Report 149: 'Protecting Development from Methane' (CIRIA, 1995a)
- Report 150: 'Methane Investigation Strategies' (CIRIA, 1995b)
- Report 151: 'Interpreting Measurement of Gas in the Ground' (CIRIA, 1995c)
- Report 152: 'Risk Assessment for Methane and Other Gases from the Ground' (CIRIA, 1995d)

More recent guidance has been published to update the documents detailed above to collaborate and promote industry 'good practice'. These are:

- CIRIA Report 665: 'Assessing risks posed by hazardous ground gases to buildings (CIRIA, 2008)
- NHBC: 'Guidance on evaluation of development proposals on sites where methane and carbon dioxide are present' (NHBC, 2007)
- BS8485:201+A1:2019: Code of practice for the design of protective measures for methane and carbon dioxide ground gases for new buildings (BSI Group, 2019)
- BS8576:2013: Guidance on investigations for ground gas. Permanent gases and Volatile Organic Compounds (VOCs) (BSI Group, 2013)
- SoBRA Report Development of Generic Assessment Criteria for Assessing Vapour Risks to Human Health from Volatile Contaminants in Groundwater (Feb 2017)
- CL:AIRE Technical Bulletin TB17 Ground Gas Monitoring and 'Worst Case' Conditions (CL:AIRE Aug 2018)

The earlier CIRIA 149 approach is now considered to be too conservative. A more realistic measure of the risk posed by methane and CO₂ in ground gas can be established by determining an appropriate Gas Screening Value (GSV), using the methods described in the NHBC and CIRIA 659 documents. These values are based upon earlier work undertaken by Wilson and Card (1999).

GSVs are calculated by multiplying the borehole flow rate (l/hr) by the percentage (% v/v) concentration in the gas stream of the specific component, i.e.:

$$\text{GSV} = (\text{Concentration} / 100) \times \text{Flow rate}.$$

A risk-based methodology for deriving GSVs is defined for two situations (designated A and B), which are adequate for the great majority of site cases (as per CIRIA 665 Section 8.3):

- **Situation A:** Any development other than Situation B, e.g. factories, shops, commercial, warehouses, schools, cinemas, sports centres, stadiums, high rise housing, housing with basements, etc
- **Situation B:** Low rise building with minimum ventilated under floor void (min 150 mm)

Under Situation A, classification of the scope of protection required is determined from the site GSV, summarised in Table 1. For Situation B, GSVs derived are used in a 'Traffic Light' classification (summarised in Table 2) which determines the required level and scope of protection measures. Tables 1 and 2 are summaries only: the details provided in the body text, footnotes and appendices of the above-referenced documents should be read in conjunction with the results to determine the appropriate level of protection.

For conservatism, Tier Environmental initially uses the maximum concentration and gas flow rate of methane detected in any borehole during all of the monitoring visits in deriving recommendations on appropriate protection measures. This represents the worst-case risk of forming an explosive mixtures. For carbon dioxide, steady state concentrations and flow data are applied, as these determine the development of an asphyxiating mixture. All values are selected whether or not they occurred in the same borehole or during the same monitoring event.

Exceedances of the maximum concentrations used in a Tier 1 Gas Risk Assessment can be tolerated, when the conceptual site model indicates that it is safe to do so. However, appropriately derived GSV values must never be exceeded - where site-specific circumstances permit the derivation of alternative GSVs according to the defined conceptual model, then the appropriate GSV values should be applied.

Table 1. GSV Categories Defined for Situation A (Summarised from CIRIA Report 665).

Risk classification	GSV (CH ₄ or CO ₂ ; l/hr)	Additional factors	Characteristic Situation
Very low	<0.07	Typically methane <=1% and/or CO ₂ <=5%, otherwise consider increase to Low Risk.	1
Low	<0.7	Typically borehole ground gas flow rate <=70 l/hr; otherwise consider increase to Moderate Risk.	2
Moderate	<3.5	---	3
Moderate to high	<15	QRA required to evaluate scope of remediation measures.	4
High	<70	---	5
Very high	>70	---	6

Table 2. GSV Categories Defined for Situation B (Summarised from NHBC, 2007).

Methane		CO ₂		"Traffic light" classification
Typical max. conc. (% v/v)	GSV (l/hr)	Typical max. conc. (% v/v)	GSV (l/hr)	
				Green
1	0.13	5	0.78	Amber 1
5	0.63	10	1.60	
				Amber 2
20	1.60	30	3.10	Red

Assessment of hydrogen sulphide (H₂S)

H₂S is toxic and highly odorous ("rotten eggs") gas. It is often a minor component within mine gases, in ground gas within or overlying strata rich in pyrites or other sulphide-rich ores, and in most natural gas fields.

H₂S can be generated biologically in significant concentrations by the decomposition by sulphate-reducing bacteria of natural or anthropogenic organic matter under oxygen-free conditions. Its potential generation will be greater in environments containing elevated sulphate concentrations (including sea water). H₂S is therefore common within the gas arising from estuarine and marine sediments, pond sediment, stagnant water bodies, bogs and marshlands and landfilled waste, for example.

It must be noted that H₂S normally occurs together with other potentially hazardous ground gases. The measures adopted for protection against these will prove equally protective against H₂S.

There are no standards by which H₂S concentrations in ground gas can be assessed directly. Therefore, the significance of measured H₂S concentrations in ground gas must be evaluated on a case-by-case basis, taking into account the measured concentrations of other components and the specific conceptual site and exposure models. To assist in this process, the following standards and guidance may be applied.

General protection of land users

There are no UK air quality standards for general exposure to H₂S. The World Health Organisation has derived ambient air quality standards (WHO, 2000) for this gas, which may be used to inform risk assessment and decision-making:

The 24 hour average exposure guideline value for ambient air: 0.15 mg/m³ (0.1 ppmv, approx.; this was derived by the application of a 100x safety factor to the LOAEL for long-term exposure).

This is significantly above the odour threshold, which is typically around 0.01 mg/m³. To avoid substantial nuisance odour complaints, WHO (2000) recommends that the 30 minute average H₂S concentration in ambient air should not exceed: 0.007 mg/m³ (0.005 ppmv, approx.).

Occupational exposures

For occupational exposure, the HSE (2005) limits for H₂S are applicable:

- 8 hour time weighted average occupational exposure limit: 5 ppmv (7 mg/m³).
- Short-term exposure limit (15 minute reference period): 10 ppmv (14 mg/m³).

VOC Data Collection, Sampling and Assessment

BS8576 Guidance on investigations for ground gas – Permanent gases and Volatile Organic Compounds (VOCs).

Volatile organic compounds (VOCs) include, for example, halogenated hydrocarbons such as trichloroethene, non-halogenated hydrocarbons such as benzene, and organosulfur compounds such as thiols (mercaptans). They can occur as a component of ground gas originating from historically contaminated ground, spills and leaks from industry, commercial or residential properties (e.g. from pipelines, storage facilities, and at the point of use or dispensing), land-filled wastes and from naturally occurring sources.

The migration of VOCs in ground gas can be via three primary mechanisms:

- diffusive flow (movement of constituent along a concentration gradient);
- advective flow (movement of constituent due to motion of a transporting fluid);
- dispersion (transport resulting from local variations in fluid flow, e.g. due to friction effects in the matrix).

The choice of sampling and monitoring techniques should be based upon the conceptual model and be designed to achieve the objectives of the investigation, bearing in mind the requirements of any subsequent analytical procedures and the need to provide relevant data of sufficient quantity and quality. Consideration should also be given to the nature of ground under investigation, as well as the nature and distribution of contamination, the geology and the hydrogeology. Every effort should be made to avoid cross-contamination and at no point should underlying aquifers be put at risk.

Where the response zone extends below the water table, gas present in the groundwater will tend to produce an equilibrium concentration in the well headspace. This applies to both permanent gases and VOCs but can be particularly misleading in the latter case. Testing for dissolved gases in groundwater is useful to help interpret monitoring results in such a situation. Similarly, any VOCs in a floating non-aqueous hydrocarbon layer will produce an equilibrium concentration in the well headspace.

The monitoring period and frequency of monitoring for VOCs in ground gases should be developed on a site-specific basis from the conceptual site model and investigation data quality objectives.

Ground gas samples can be collected from the unsaturated zone adjacent to, or above, the known or suspected source of VOCs in ground gas through installation of a ground gas monitoring point in the unsaturated zone (see 10.2), and from a near-surface location beneath hardstanding or a floor or foundation slab through installation of a near- or sub-slab monitoring point (see 10.3). For monitoring of VOCs in ground gas the monitoring well should be installed into unsaturated ground to allow sampling for VOCs to take place. The borehole should not be progressed below the groundwater table or the surface of any floating non-aqueous layer. The borehole should be progressed to the target sampling depth within the unsaturated zone. Full details can be found in BS8576 Section 10.2 onwards.

Assessment of VOC concentrations have been made for limited number of VOCs by SoBRA with the Development of Generic Assessment Criteria for Assessing Vapour Risks to Human Health from Volatile Contaminants in Groundwater in Feb 2017.

The assessment of VOC concentrations is not covered by above-referenced reports. These data can be used to inform the human health risk assessment for site occupants but should not be relied upon to assess human health risk due to uncertainties in the ground gas flow regime, variability in the (generally low) contaminant concentrations measured and inaccuracies in the concentrations measured by PID instruments.

Data on the VOC concentration in ground gas can also help inform potential occupational exposure risks to construction and similar workers. For this purpose, the measured values can be compared to the relevant occupational exposure limit (OEL) for the contaminant(s) of concern, as given in HSE (2005). In cases of doubt as to the identity of the organic contaminants within the ground gas or when these are present as a complex mixture, then the 8 hour time-weighted average (TWA) exposure limit for benzene (1 ppmv) will be applied for screening purposes. This is a reasonably conservative approach since the OEL for benzene is lower than that for the great majority of organic contaminants commonly encountered in soil and groundwater at contaminated sites

APPENDIX K - CHEMICAL AND GEOTECHNICAL TEST SAMPLING

Samples were selected by a representative of Tier Environmental during the site investigation works in accordance with the sampling approach described elsewhere in this report.

Samples for geotechnical and related testing

Bulk samples were placed within robust heavy duty plastic bags and sealed, together with small disturbed samples, within airtight 1 litre plastic containers.

100 mm diameter ‘undisturbed’ samples (“U100 samples”) were obtained where possible from cable percussive and large diameter window sample boreholes within cohesive materials.

Samples for chemical analysis

All samples for chemical analysis were placed into clean new containers as summarised in Table 1. Unless explicitly stated elsewhere in this report, no preservatives were used to eliminate the risk that preservatives cause contaminant dissolution or analytical interference. Containers for VOC analysis were fully filled to exclude headspace.

Soil samples were dispensed as soon as possible after collection using reusable stainless steel spatulas, trowels or similar implements.

Ground water samples were collected from boreholes using single-use Teflon bailers or dedicated Waterra tubing with foot valves, except as otherwise noted within this report. Caution was taken to avoid excessive agitation during collection

New disposable gloves were used by the engineer for the collection of each sample.

Reusable equipment was washed down with distilled or deionised water between samples, except where tarry or similarly sticky materials were present. In such cases specific cleaning procedures were adopted as specifically described elsewhere in this report.

All sub-samples taken for chemical analysis were placed into refrigerators or cool boxes containing frozen ice packs immediately after aliquoting. All samples were transferred in cool boxes containing frozen ice packs to the relevant UKAS/MCERTS accredited laboratory as soon as possible. Recommended maximum holding times before analysis are summarised in Table 1.

Table 1. Sample containers and holding times.

Analysis	Container/special requirements	Max. holding time at 4°C before analysis
Soil and sediment samples		
VOCs	30-60 g brown or green glass jar with VOC-resistant cap and inert cap liner. Must be fully filled.	14 days
TPHCWG	30-60 g brown or green glass jar with VOC-resistant cap and inert cap liner PLUS 250-500 g brown or green glass jar with unwaxed cap liner. ¹ The former must be fully filled.	14 days
All other organics	250-500 g brown or green glass jar with unwaxed cap liner.	7 days
Inorganics	Air-tight 0.5-2.0 kg plastic container (250-500 g brown or green glass jar may also be used).	14 days ²
Water samples		
VOCs	40-50 ml glass vial with VOC resistant screw cap and inert liner. Must be fully filled.	14 days
TPHCWG	40-50 ml glass vial with VOC resistant screw cap and inert liner PLUS 500-1000 ml brown or green glass bottle with screw cap and unwaxed liner. ¹ The former must be fully filled, the latter should be filled if possible.	14 days
All other organics	500-1000 ml brown or green glass bottle with screw cap. Fill if possible.	7 days
Inorganics	500-1000 ml translucent or opaque screw cap plastic <i>or</i> brown or green glass bottles. Fill if possible.	14 days ³

¹ The smaller vessel is used for analysis of the volatile components within the TPH mixture and the larger one is for the non-volatile components.

² 14 days is set as a reasonable limit for all routine analyses of soil for those inorganic components vulnerable to chemical and/or biological breakdown. Samples for sulphate analysis are vulnerable to biological sulphate-reduction but can be held for up to 28 days. For total metals, a holding period of up to 6 months is acceptable.

³ 14 days applies for all routine analyses of most inorganic components that may be vulnerable to chemical and/or biological reactions. In the specific cases of sulphide, nitrite, nitrate and phosphate analyses, storage time must not exceed 48 hours. For total metals, a holding time of up to 6 months is acceptable.

Tier Environmental standard analytical suites

The analyses included with Tier Environmental's standard analytical suites for soil, soil leachate and water samples are presented in Table 2. Other individual analyses were specified as described within this report.

Table 2. Tier Environmental Standard Analytical Suites.

Parameter	Sample type					
	Soil		Leachate ¹		Water	
		LoD ² (mg/kg or as stated)		LoD (µg/l or as stated)		LoD (µg/l or as stated)
Metals and metalloids						
Arsenic	✓	1	✓	10	✓	10
Cadmium	✓	1	✓	5	✓	5
Chromium	✓	1	✓	5	✓	5
Mercury	✓	1	✓	1	✓	1
Lead	✓	1	✓	4	✓	4
Selenium	✓	2	✓	10	✓	10
Copper	✓	1	✓	1	✓	1
Nickel	✓	1	✓	50	✓	50
Zinc	✓	1	✓	8	✓	8
Other inorganics						
Ammonia (as NH ₄ -N)					✓	15
Total sulphate	✓	100			✓	50 mg/l
Water-soluble sulphate	✓	0.1 g/l				
Hardness (as CaCO ₃)					✓	1 mg/l
Organics						
Monohydric phenol	✓	1	✓	0.5	✓	0.5
Speciated PAHs (USEPA 16)	✓	0.1	✓	0.01	✓	0.01
Total Organic Carbon	✓	0.1 wt%				
Others						
Electrical conductivity					✓	NA
pH	✓	NA	✓	NA	✓	NA

NA - Not applicable

¹ Leachate preparation according to NRA (1994), 10:1 liquid to solid ratio.

² The table presents the desired limit of detection for the analysis. Higher LoDs may be reported on analytical data sheets due to interference between analytes within specific samples or if the laboratory needed to dilute samples to achieve results within the calibrated range for that instrument.

Analytical QA procedures

Introduction

Quality Assurance (QA) is a system of review and audit that assesses the effectiveness of that product and assures the producer and user that defined standards of quality have been met. If we consider site investigation and chemical analysis, QA is the management system that ensures these measures are in place and working as intended.

QA within the laboratory form part of relevant certification programmes (such as UKAS and MCERTS) and, indeed, will be undertaken in some form by any reputable analyst, whether for a certified technique or not. Laboratory QA/QC is beyond the control of Tier Environmental and will not be considered further in this document, although the relevant laboratory documentation can be obtained upon request. QA must also form part of the design and execution of a site investigation.

Two parameters often used to assess measurement quality objectives are bias and precision. Bias is a systematic deviation in the data. For example, a positive bias (concentrations higher than in reality) would be introduced if sampling bottles were a source of the analyte and this fact was unknown. Precision is the variation in the measurements around a central 'expected' value. This could be due both to real variability in the environmental medium being measured and random errors in the analytical process. Both precision and bias can be assessed by the use of appropriate blanks and replicates within the site investigation programme.

The objectives of the QA activities undertaken in this present site investigation were to recognise and quantify systematic bias within the analytical dataset and to obtain an indication of precision. In environmental samples, much of the observed variability is likely to result from heterogeneity in the sampled medium, particularly for soil and sediment samples.

Such QA practice within the sampling programme is required by current guidance (e.g., Environment Agency report P5-065/TR (2000); Environment Agency LFTGN02 (2002); BS 10175:2001).

Alternative QA procedures to the generic approach presented in this appendix may be specified for a project, provided case-specific justification is given.

QA checking procedure (data validation)

The responsible Engineer and Project Reviewer are required to undertake data validation and provide comment on data quality within the main body of the report(s) issued, when noteworthy matters arise. This QA checking should involve:

Confirming that data reported by the laboratory have achieved the standards specified by the certification scheme (MCERTS or UKAS). This will be indicated on the analytical certificates issued by the laboratory.

Checking that the limit of detection (LoD) and limit of quantification (LoQ) achieved by the laboratory for an individual analyte is appropriate for the purposes of the report. LoD and LoQ will vary dependent upon analyte concentrations, sample matrix properties and interference from co-contaminants.

A check that the reported range of concentrations are reasonable for the analyte. For example, the dissolved concentration of an analyte in a water sample should not exceed saturation. If it does, then this merits further consideration (e.g., was colloidal organic matter or other solid-phase material present or could there have been unobserved free-phase organic liquid?) and explicit comment. At its simplest, there may be a unit error.

Where analysis involves reporting of Tentatively Identified Compounds (TICs; normally by mass spectrometry), the reviewers should check that these might reasonably be expected at the site under consideration. The uncertainties in identification by MS mean that it is not uncommon that TICs are incorrectly assigned. In cases of doubt, the analytical laboratory can re-check the raw data and confirm.

A review of the analytical precision by comparing data obtained for duplicate samples. There is no absolute threshold - variability is entirely dependent upon the sample matrix and manner in which the contaminant has entered the sample. Variability that cannot reasonably be assigned to such factors (for example a very high apparent variability in data for sediment-free water samples) should be reviewed with the laboratory. Variability that is attributable to the sample matrix can nevertheless provide important pointers to improve understanding of contaminant transport pathways and the risks posed by pollutant linkages (e.g., soil heterogeneity, the association of contamination with particular soil fractions, the presence of residual NAPL within soil pores or the role of suspended sediments in contaminant transport).

Confirmation that no errors have been introduced by data transcription, unit conversion or corrections between preliminary and certificates issued by the laboratory. The reviewer should audit a proportion (typically 5-10%) of all data from the original (final) certificates of analysis through to the equivalent values in the report for those specific samples.

It is important to consult the analytical laboratory if apparent QA issues arise. Many apparent concerns can be adequately resolved on the basis of revisiting the raw analytical data or by obtaining a better understanding of the inherent limitations of the analysis for a particular matrix or sample type.

APPENDIX L - COMPLYING WITH CONTROL OF ASBESTOS REGULATIONS 2012

Complying with Control of Asbestos Regulations (CAR): Risk Assessments, Licensing and Training

This appendix outlines CAR risk assessments and where they should be applied in relation to assessing and remediating brownfield sites. The information below details the different classifications of work with asbestos under CAR, summarises the legal requirements for asbestos awareness training for all involved in the investigation and management of asbestos containing soil (ACS), and details the potential requirements for suitable proficiency training relating specifically to ACS.

CAR RISK ASSESSMENTS

A CAR Risk Assessment is required for any work which may expose employees to asbestos. It is recommended that a precautionary approach is adopted if there is any doubt about risks associated with asbestos.

There are three main activities for potential asbestos exposure during work on brownfield sites:

- Site reconnaissance visits;
- Site investigation works; and
- Site remediation.

CAR risk assessments are needed at each stage but may be incorporated during the site investigation stage into the overarching health and safety risk assessments.

The CAR risk assessment must:

- Identify the type of asbestos to which employees are liable to be exposed, where possible, or assume it is present in different forms;
- Determine the type and extent of exposures to asbestos that may occur during the work
- Identify the steps to be taken to prevent exposure or reduce it to the lowest level reasonably practicable; and,
- Consider the effects of control measures that have been or will be taken.

The CAR risk assessment should include any information used to inform the risk assessment such as asbestos reports or desk study information. In the event that this information is not available, the assessor should be assumed that all forms of asbestos may be present on Site.

For all investigation and remediation of ACSs, a detailed written work plan should be produced and followed as detailed on the HSE website and in the CAR.

The CAR risk assessments for specific investigations or remediation projects, will determine whether or not work is 'licensable work' (LW), notifiable non-licensable work' (NNLW) or 'non-licensed work' (NLW). In addition, training requirements are also defined by the CAR risk assessment.

Some examples of control measures that apply during site reconnaissance, site investigation works, and site remediation are given below and should be applied depending on the asbestos risks identified for the Site at each stage of investigation:

- Avoiding stirring up dust;
- Cleaning footwear after site works;
- Removing and bagging any overalls for disposal/laundry;
- Respirators and hygiene facilities for high risk sites;
- Segregated welfare units;
- Wetting ground
- Minimising soil disturbances;
- Implementation or retention of capping/break layers;
- Implementation of awareness training;
- Air monitoring;
- Managing stockpiles;
- Area segregation;
- Wheel washing
- Road washing/cleaning

It is important to note that during Site reconnaissance visits, Site investigation works and Site remediation that asbestos should not be considered in isolation and control measures are likely to form part of a wider health and safety precautions.

Respiratory protective equipment (RPE)

RPE is the last line of defence and its requirement would be defined by the CAR risk assessment. HSE (2013b) advises that RPE should have an assigned protection factor of 20 or more for all work with asbestos. In certain instances, full face-piece, positive pressure respirators with a protection factor of 40 are necessary (to EN 12942:1998, TM3).

Suitable types of RPE for most **short** duration non-licensed asbestos work:

- Disposable respirator to standards EN149 (type FFP3) or EN1827 (type FMP3)
- Half mask respirator (to standard EN140) with P3 filter
- Semi-disposable respirator (to EN405) with P3 filter

These filters are not suitable for people with beards/stubble or for long or continuous use.

LICENSING

CAR defined certain types of activities involving asbestos as 'licensable work' (LW) or as 'notifiable non-licensable work' (NNLW). All other work would be 'non-licensable work' (NLW).

LW is defined as:

- work where exposure is not 'sporadic and low intensity'
- work where the risk assessment cannot demonstrate that the control limits (four hour and 10 minute limits) will not be exceeded
- work on asbestos coating
- work on AIB or insulation where risk assessment is either of first two points above or not of short duration (where short duration is defined for any work liable to disturb asbestos as taking less than two hours per week (including ancillary work) and no one person carries out that work for more than one hour').

NNLW includes work with:

- AIB or asbestos insulation of short duration that is not licensable
- fire-damaged asbestos cement or asbestos cement damaged so as to create significant dust and debris
- asbestos ropes, yarns, woven cloths in poor condition or handling cutting or breaking up the materials
- asbestos papers, felts and cardboard in poor condition, unencapsulated or not bound into another material.

Work with weathered asbestos cement, air monitoring and collecting samples of ACM in buildings would not normally be notifiable.

It is impossible to specify definitively what activities will and will not be licensable. This decision should be made as part of the CAR risk assessment. CAR is not primarily aimed at work with ACSs and there is little published information on airborne asbestos concentrations during work with ACSs. Nevertheless, CAR will require some remediation projects, and occasionally site investigations, to be LW. Investigations on other sites may involve NNLW. The decision as to whether work is LW or NNLW should be made during the CAR risk assessment by those in charge of the brownfield site investigations and remediation projects.

TRAINING REQUIREMENTS

Asbestos health and safety courses are offered by a number of providers in the UK. Training courses that include the problem of identifying ACMs in soil should be undertaken at regular intervals by those involved in the investigation, assessment and management of sites where ACs are known or suspected. It is the role of the employer to identify the level of training required for an employee based on their role, experience and duties. Reference to Regulation 10 of CAR should be referred to for more information on training requirements.

Recognising asbestos within soils is challenging due to the heterogeneity of such soils and the discolouration of asbestos by smeared soil. Specific training for ground workers should include understanding fibre release potential, potential control measures in the field, how to take representative ACSs safely, sample labelling and what analytical tests are available and when they should be implemented.

Health and safety training required under CAR includes asbestos awareness, non-licensable work (including notifiable non-licensable work) and licensable work with asbestos.

In addition to health and safety training, some staff involved in the technical identification on site of ACMs, sampling and analysis may require technical proficiency training (competency training).

Training vs. Competence

HSE (2005) identifies that 'training alone does not make people competent. Training must be consolidated by practical experience so that the person becomes confident, skilful and knowledgeable in practice on the job'. It is critical that ACS surveyors demonstrate competency with details of relevant field experience alongside training and examples of previous works/references.