DATRYS

Ardagh Group, Wrexham
Earth bank Removal

Pre-Removal Contamination Report
March 2021



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Earth Bank Removal

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March 2021

Prepared for:	M&J Services (JB) Ltd Ash Road North Wrexham Industrial Estate
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Date:	11.03.2021
Datrys Job No:	21034

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1. INTRODUCTION

Datrys were commissioned by M&J Services (JB) Ltd to undertake contamination testing on an earth bank at Ardagh Group, Wrexham Industrial Estate.

The earth bank was trapezoidal on section and approximately 20m wide at the base, 6m high and 250m long. We understood that it was constructed approximately 20 years ago using soil excavated from the location of the enlarged factory.

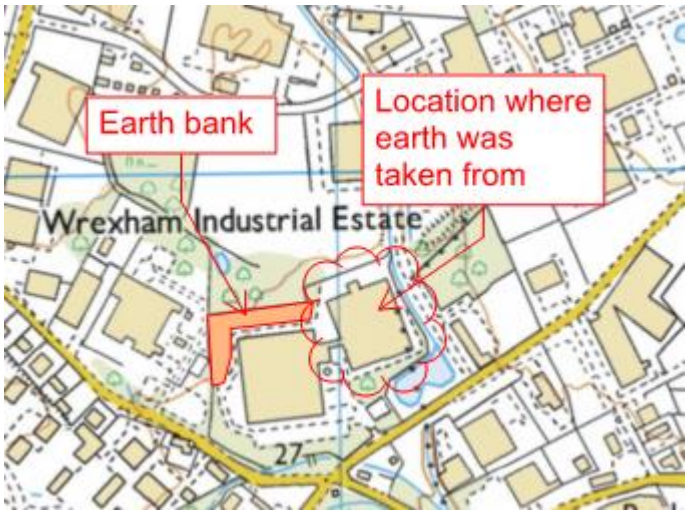


Figure 1. Site plan

The bank will be removed to make way for an improved access road and contamination testing is required to determine the appropriate location for the offsite disposal of the material.

This report details the findings of the contamination testing and has been prepared for the sole use of the Client. The samples of material taken for the contamination testing were extracted from locations over the extent of the bank which were purely selected on their accessibility with the excavator. Comments given and opinions expressed in this report are based on the available information at the time of the study.

The excavations and contamination results give an indication only of the composition of the earth bank and its contaminants based on a sample area.

2. WALKOVER SURVEY & DESK STUDY

Datrys undertook a walkover of the site and carried out a brief desk study prior to collecting the soil samples for testing. The purpose of the walkover was to view the bank, assess for any overhead services or restrictions and agree an appropriate number of samples to take and the locations where the samples could be taken based on accessibility for the excavator.

The subsequent desk study was carried out to investigate the history of the site to understand the likely soil type and contaminants that would most likely be present.

2.1 Walkover Survey

A walkover survey was undertaken on the 14th of January 2021. The earth bank to be removed comprised two areas: a small bank to the south west and the main bank to the west and north of the site as shown below.



Figure 2. Site Arial Plan

The small earth bank was free from trees and easily accessible. Its height was approx. 2m (reference photographs in appendix A). The main bank, apart from the southern end, was covered in trees. Its height was estimated to be 6m at the highest point and had a length of approximately 250m.

There was an access road which ran along the southern extent. There were services under the road but no sign of any services within the bank itself. We understood that A high voltage cable ran along the fence line on the northern side of the main bank. There were no overhead services.

It was agreed that 4 samples from the main bank would be appropriate and one from the smaller bank. It would be necessary to take the samples from the southern side with the excavator parked on the road. A CAT scanner would be used prior to any excavation to check for and services.

2.2 Desk Study

The site was located at grid reference SJ 380 497. Historic maps indicate that there was some form of earth bunds on the site of the new factory (where the soil material was taken from). Figure 3 shows the map from 1961.

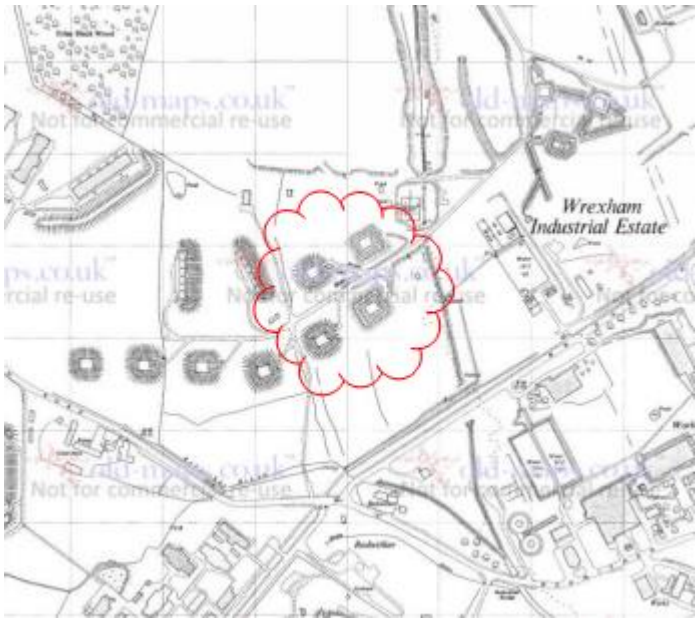


Figure 3. 1961 – Earth bunds on the site of the newer factory building

Since 1961 there has been no buildings on the site and the map of 1992 shows the bunds removed and the site undeveloped.

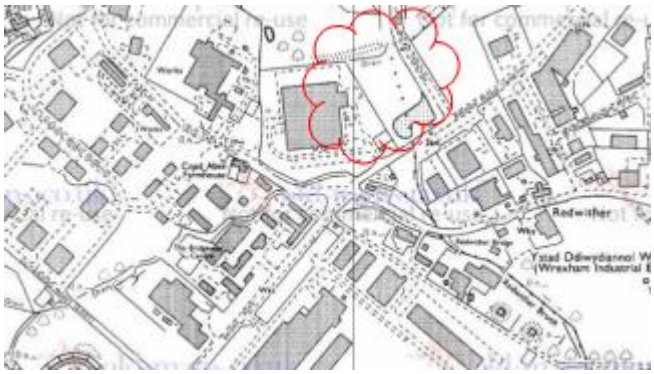


Figure 4. 1992 – Bunds removed and the site undeveloped.

After this, there has been no development of the site until the newer factory building was constructed.

Based on the above and our knowledge of the natural ground composition from other sites in the vicinity, it was expected that the earth bank would likely comprise uncontaminated, natural ground strata of a sandy, gravelly clay nature.

The British Geological Survey indicates that the superficial deposits within the site are likely to comprise till. The superficial deposits are underlain at an interface/fracture between sandstone and mudstone.

There are no known records of quarrying or mining within the area. The British Geological survey shows the site lies just outside a coal mining area. Records suggest that there has been no mining in the vicinity.

3. SITE EXCAVATION & CONTAMINATION TESTING

Excavations and samples were taken at five locations on the 12th of February 2021. The sample location plan is provided in appendix C.

The excavations revealed that the two earth banks comprised natural ground strata which was generally identified as being a black organic soil overlying a brown gravelly clay material. Some of the trial pits uncovered brick and concrete fragments which were probably the remnants of small structures that occupied the location of the new factory building.

Excavation sides were stable, and no ground water was encountered. None of the excavated material had an unnatural or chemical odour.

3.1 Laboratory Testing for Contamination

A Full WAC test was undertaken by DETS on each of the five soil samples collected at depths of 1m to determine whether the material would be a hazardous waste product.

The WAC test results show a strong correlation in the constituent properties of the material. All values are below the acceptance criteria for Inert waste apart from the PH values. These range between 7.1 and 8.2 and are above the criteria of 6 and therefore the material is classified as Non-Hazardous/Stable non-reactive waste. Reference appendix B for detailed results.

4. CONCLUSION

There is a strong correlation in the contamination testing results and the soil tested at each of the five locations is **non-hazardous waste/ Stable non-reactive.**

If, during the removal of the bank, a suspect contamination is identified then appropriate actions shall be undertaken to isolate the area and undertake further contamination testing.

APPENDICES

APPENDIX A



Photograph 1: Walkover Survey – photograph looking toward smaller bank.



Photograph 2: Walkover Survey – photograph on top of first bank looking toward the main bank.



Photograph 3: Walkover Survey – photograph on top of bank.



Photograph 4: Walkover Survey – photograph on top of bank.



Photograph 5: Walkover Survey – photograph looking along bank.



Photograph 6: Walkover Survey - photograph at end of bank.



Photograph 7: Sample location 1



Photograph 8: Sample location 1



Photograph 9: Sample location 2



Photograph 10: Sample location 2



Photograph 11: Sample location 3



Photograph 12: Sample location 3



Photograph 12: Sample location 4



Photograph 13: Sample location 4



Photograph 14: Sample location 5

APPENDIX B

WASTE ACCEPTANCE CRITERIA TESTING ANALYTICAL REPORT

Our Ref 21-04084
Client Ref
Contract Title 21034-Soil Testing at Ardagh Group
Sample Id TP1

Sample Numbers 1807777 1807782
Date Analysed 04/03/2021

Test Results On Waste

Determinand and Method Reference	Units	Result	WAC Limit Values: Inert Waste	SNRHW	Hazardous Waste
DETSC 2084# Total Organic Carbon	%	< 0.5	3	5	6
DETSC 2003# Loss On Ignition	%	3.3	n/a	n/a	10
DETSC 3321# BTEX	mg/kg	< 0.04	6	n/a	n/a
DETSC 3401# PCBs (7 congeners)	mg/kg	< 0.01	1	n/a	n/a
DETSC 3311# TPH (C10 - C40)	mg/kg	< 10	500	n/a	n/a
DETSC 3301 PAHs	mg/kg	< 1.6	100	n/a	n/a
DETSC 2008# pH	pH Units	8.0	n/a	>6	n/a
DETSC 2073* Acid Neutralisation Capacity (pH4)	mol/kg	< 1.0	n/a	TBE	TBE
DETSC 2073* Acid Neutralisation Capacity (pH7)	mol/kg	< 1.0	n/a	TBE	TBE

Test Results On Leachate

Determinand and Method Reference	Conc in Eluate ug/l 10:1	Amount Leached* mg/kg LS10	WAC Limit Values (Limit values for LS10 Leachate): Inert Waste	SNRHW	Hazardous Waste
DETSC 2306 Arsenic as As	5.5	0.055	0.5	2	25
DETSC 2306 Barium as Ba	12	0.12	20	100	300
DETSC 2306 Cadmium as Cd	0.07	< 0.02	0.04	1	5
DETSC 2306 Chromium as Cr	2.3	< 0.1	0.5	10	70
DETSC 2306 Copper as Cu	5.4	0.054	2	50	100
DETSC 2306 Mercury as Hg	0.016	< 0.002	0.01	0.2	2
DETSC 2306 Molybdenum as Mo	2.6	< 0.1	0.5	10	30
DETSC 2306 Nickel as Ni	0.72	< 0.1	0.4	10	40
DETSC 2306 Lead as Pb	0.94	< 0.05	0.5	10	50
DETSC 2306 Antimony as Sb	2.9	< 0.05	0.06	0.7	5
DETSC 2306 Selenium as Se	1.5	< 0.03	0.1	0.5	7
DETSC 2306 Zinc as Zn	2.2	0.022	4	50	200
DETSC 2055 Chloride as Cl	2200	< 100	800	15,000	25,000
DETSC 2055* Fluoride as F	130	1.3	10	150	500
DETSC 2055 Sulphate as SO4	6000	< 100	1000	20,000	50,000
DETSC 2009* Total Dissolved Solids	43000	430	4000	60,000	100,000
DETSC 2130 Phenol Index	< 100	< 1	1	n/a	n/a
DETSC 2085 Dissolved Organic Carbon	< 2000	< 50	500	800	1000

TBE - To Be Evaluated
SNRHW - Stable Non-Reactive Hazardous Waste

Additional Information

DETSC 2008 pH	9.8
DETSC 2009 Conductivity uS/cm	61.0
* Temperature*	18.0

Mass of Sample Kg*	0.110
Mass of dry Sample Kg*	0.094

Stage 1

Volume of Leachant L2*	0.921
Volume of Eluate VE1*	0.88

Disclaimer: *The WAC limit values are provided for guidance only. DETS does not accept responsibility for errors or omissions. Values are correct at time of issue.*

V.2.06 ** DETS are accredited for the testing of leachates and not the leachate preparation stage which is unaccredited.*

WASTE ACCEPTANCE CRITERIA TESTING ANALYTICAL REPORT

Our Ref 21-04084
Client Ref
Contract Title 21034-Soil Testing at Ardagh Group
Sample Id TP2

Sample Numbers 1807778 1807783
Date Analysed 04/03/2021

Test Results On Waste

Determinand and Method Reference	Units	Result	WAC Limit Values: Inert Waste	SNRHW	Hazardous Waste
DETSC 2084# Total Organic Carbon	%	< 0.5	3	5	6
DETSC 2003# Loss On Ignition	%	3.2	n/a	n/a	10
DETSC 3321# BTEX	mg/kg	< 0.04	6	n/a	n/a
DETSC 3401# PCBs (7 congeners)	mg/kg	< 0.01	1	n/a	n/a
DETSC 3311# TPH (C10 - C40)	mg/kg	< 10	500	n/a	n/a
DETSC 3301 PAHs	mg/kg	< 1.6	100	n/a	n/a
DETSC 2008# pH	pH Units	8.2	n/a	>6	n/a
DETSC 2073* Acid Neutralisation Capacity (pH4)	mol/kg	< 1.0	n/a	TBE	TBE
DETSC 2073* Acid Neutralisation Capacity (pH7)	mol/kg	< 1.0	n/a	TBE	TBE

Test Results On Leachate

Determinand and Method Reference	Conc in Eluate ug/l 10:1	Amount Leached* mg/kg LS10	WAC Limit Values (Limit values for LS10 Leachate): Inert Waste	SNRHW	Hazardous Waste
DETSC 2306 Arsenic as As	4.4	0.044	0.5	2	25
DETSC 2306 Barium as Ba	16	0.16	20	100	300
DETSC 2306 Cadmium as Cd	< 0.030	< 0.02	0.04	1	5
DETSC 2306 Chromium as Cr	3.1	< 0.1	0.5	10	70
DETSC 2306 Copper as Cu	5.2	0.052	2	50	100
DETSC 2306 Mercury as Hg	< 0.010	< 0.002	0.01	0.2	2
DETSC 2306 Molybdenum as Mo	< 1.1	< 0.1	0.5	10	30
DETSC 2306 Nickel as Ni	< 0.50	< 0.1	0.4	10	40
DETSC 2306 Lead as Pb	0.4	< 0.05	0.5	10	50
DETSC 2306 Antimony as Sb	1.5	< 0.05	0.06	0.7	5
DETSC 2306 Selenium as Se	0.59	< 0.03	0.1	0.5	7
DETSC 2306 Zinc as Zn	1.6	0.016	4	50	200
DETSC 2055 Chloride as Cl	1500	< 100	800	15,000	25,000
DETSC 2055* Fluoride as F	< 100	< 0.1	10	150	500
DETSC 2055 Sulphate as SO4	6800	< 100	1000	20,000	50,000
DETSC 2009* Total Dissolved Solids	55000	550	4000	60,000	100,000
DETSC 2130 Phenol Index	< 100	< 1	1	n/a	n/a
DETSC 2085 Dissolved Organic Carbon	< 2000	< 50	500	800	1000

TBE - To Be Evaluated
SNRHW - Stable Non-Reactive Hazardous Waste

Additional Information

DETSC 2008 pH	10.0
DETSC 2009 Conductivity uS/cm	78.9
* Temperature*	18.0

Mass of Sample Kg*	0.110
Mass of dry Sample Kg*	0.095

Stage 1

Volume of Leachant L2*	0.933
Volume of Eluate VE1*	0.91

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WASTE ACCEPTANCE CRITERIA TESTING ANALYTICAL REPORT

Our Ref 21-04084
Client Ref
Contract Title 21034-Soil Testing at Ardagh Group
Sample Id TP3

Sample Numbers 1807779 1807784
Date Analysed 04/03/2021

Test Results On Waste

Determinand and Method Reference	Units	Result	WAC Limit Values: Inert Waste	SNRHW	Hazardous Waste
DETSC 2084# Total Organic Carbon	%	1.3	3	5	6
DETSC 2003# Loss On Ignition	%	5.2	n/a	n/a	10
DETSC 3321# BTEX	mg/kg	< 0.04	6	n/a	n/a
DETSC 3401# PCBs (7 congeners)	mg/kg	< 0.01	1	n/a	n/a
DETSC 3311# TPH (C10 - C40)	mg/kg	410.0	500	n/a	n/a
DETSC 3301 PAHs	mg/kg	7.1	100	n/a	n/a
DETSC 2008# pH	pH Units	8.0	n/a	>6	n/a
DETSC 2073* Acid Neutralisation Capacity (pH4)	mol/kg	< 1.0	n/a	TBE	TBE
DETSC 2073* Acid Neutralisation Capacity (pH7)	mol/kg	< 1.0	n/a	TBE	TBE

Test Results On Leachate

Determinand and Method Reference	Conc in Eluate ug/l 10:1	Amount Leached* mg/kg LS10	WAC Limit Values (Limit values for LS10 Leachate): Inert Waste	SNRHW	Hazardous Waste
DETSC 2306 Arsenic as As	12	0.12	0.5	2	25
DETSC 2306 Barium as Ba	17	0.17	20	100	300
DETSC 2306 Cadmium as Cd	< 0.030	< 0.02	0.04	1	5
DETSC 2306 Chromium as Cr	7.3	< 0.1	0.5	10	70
DETSC 2306 Copper as Cu	5.9	0.059	2	50	100
DETSC 2306 Mercury as Hg	< 0.010	< 0.002	0.01	0.2	2
DETSC 2306 Molybdenum as Mo	< 1.1	< 0.1	0.5	10	30
DETSC 2306 Nickel as Ni	< 0.50	< 0.1	0.4	10	40
DETSC 2306 Lead as Pb	1.8	< 0.05	0.5	10	50
DETSC 2306 Antimony as Sb	9.3	0.09	0.06	0.7	5
DETSC 2306 Selenium as Se	0.53	< 0.03	0.1	0.5	7
DETSC 2306 Zinc as Zn	2.5	0.025	4	50	200
DETSC 2055 Chloride as Cl	2900	< 100	800	15,000	25,000
DETSC 2055* Fluoride as F	150	1.5	10	150	500
DETSC 2055 Sulphate as SO4	7500	< 100	1000	20,000	50,000
DETSC 2009* Total Dissolved Solids	49000	490	4000	60,000	100,000
DETSC 2130 Phenol Index	< 100	< 1	1	n/a	n/a
DETSC 2085 Dissolved Organic Carbon	< 2000	< 50	500	800	1000

TBE - To Be Evaluated
SNRHW - Stable Non-Reactive Hazardous Waste

Additional Information

DETSC 2008 pH	9.7
DETSC 2009 Conductivity uS/cm	70.4
* Temperature*	18.0

Mass of Sample Kg*	0.120
Mass of dry Sample Kg*	0.098

Stage 1

Volume of Leachant L2*	0.96
Volume of Eluate VE1*	0.9

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WASTE ACCEPTANCE CRITERIA TESTING ANALYTICAL REPORT

Our Ref 21-04084
Client Ref
Contract Title 21034-Soil Testing at Ardagh Group
Sample Id TP4

Sample Numbers 1807780 1807785
Date Analysed 04/03/2021

Test Results On Waste

Determinand and Method Reference	Units	Result	WAC Limit Values: Inert Waste	SNRHW	Hazardous Waste
DETSC 2084# Total Organic Carbon	%	0.8	3	5	6
DETSC 2003# Loss On Ignition	%	3.8	n/a	n/a	10
DETSC 3321# BTEX	mg/kg	< 0.04	6	n/a	n/a
DETSC 3401# PCBs (7 congeners)	mg/kg	< 0.01	1	n/a	n/a
DETSC 3311# TPH (C10 - C40)	mg/kg	< 10	500	n/a	n/a
DETSC 3301 PAHs	mg/kg	< 1.6	100	n/a	n/a
DETSC 2008# pH	pH Units	8.1	n/a	>6	n/a
DETSC 2073* Acid Neutralisation Capacity (pH4)	mol/kg	< 1.0	n/a	TBE	TBE
DETSC 2073* Acid Neutralisation Capacity (pH7)	mol/kg	< 1.0	n/a	TBE	TBE

Test Results On Leachate

Determinand and Method Reference	Conc in Eluate ug/l 10:1	Amount Leached* mg/kg LS10	WAC Limit Values (Limit values for LS10 Leachate): Inert Waste	SNRHW	Hazardous Waste
DETSC 2306 Arsenic as As	3.2	0.032	0.5	2	25
DETSC 2306 Barium as Ba	13	0.13	20	100	300
DETSC 2306 Cadmium as Cd	< 0.030	< 0.02	0.04	1	5
DETSC 2306 Chromium as Cr	2.4	< 0.1	0.5	10	70
DETSC 2306 Copper as Cu	4.8	0.048	2	50	100
DETSC 2306 Mercury as Hg	< 0.010	< 0.002	0.01	0.2	2
DETSC 2306 Molybdenum as Mo	< 1.1	< 0.1	0.5	10	30
DETSC 2306 Nickel as Ni	< 0.50	< 0.1	0.4	10	40
DETSC 2306 Lead as Pb	0.72	< 0.05	0.5	10	50
DETSC 2306 Antimony as Sb	1.2	< 0.05	0.06	0.7	5
DETSC 2306 Selenium as Se	0.36	< 0.03	0.1	0.5	7
DETSC 2306 Zinc as Zn	2.8	0.028	4	50	200
DETSC 2055 Chloride as Cl	1900	< 100	800	15,000	25,000
DETSC 2055* Fluoride as F	< 100	< 0.1	10	150	500
DETSC 2055 Sulphate as SO4	6300	< 100	1000	20,000	50,000
DETSC 2009* Total Dissolved Solids	57000	570	4000	60,000	100,000
DETSC 2130 Phenol Index	< 100	< 1	1	n/a	n/a
DETSC 2085 Dissolved Organic Carbon	< 2000	< 50	500	800	1000

TBE - To Be Evaluated
SNRHW - Stable Non-Reactive Hazardous Waste

Additional Information

DETSC 2008 pH	9.9
DETSC 2009 Conductivity uS/cm	81.5
* Temperature*	18.0

Mass of Sample Kg*	0.110
Mass of dry Sample Kg*	0.093

Stage 1

Volume of Leachant L2*	0.917
Volume of Eluate VE1*	0.84

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WASTE ACCEPTANCE CRITERIA TESTING ANALYTICAL REPORT

Our Ref 21-04084
Client Ref
Contract Title 21034-Soil Testing at Ardagh Group
Sample Id TP5

Sample Numbers 1807781 1807786
Date Analysed 04/03/2021

Test Results On Waste

Determinand and Method Reference	Units	Result	WAC Limit Values: Inert Waste	SNRHW	Hazardous Waste
DETSC 2084# Total Organic Carbon	%	0.9	3	5	6
DETSC 2003# Loss On Ignition	%	3.8	n/a	n/a	10
DETSC 3321# BTEX	mg/kg	< 0.04	6	n/a	n/a
DETSC 3401# PCBs (7 congeners)	mg/kg	< 0.01	1	n/a	n/a
DETSC 3311# TPH (C10 - C40)	mg/kg	< 10	500	n/a	n/a
DETSC 3301 PAHs	mg/kg	< 1.6	100	n/a	n/a
DETSC 2008# pH	pH Units	8.0	n/a	>6	n/a
DETSC 2073* Acid Neutralisation Capacity (pH4)	mol/kg	< 1.0	n/a	TBE	TBE
DETSC 2073* Acid Neutralisation Capacity (pH7)	mol/kg	< 1.0	n/a	TBE	TBE

Test Results On Leachate

Determinand and Method Reference	Conc in Eluate ug/l 10:1	Amount Leached* mg/kg LS10	WAC Limit Values (Limit values for LS10 Leachate): Inert Waste	SNRHW	Hazardous Waste
DETSC 2306 Arsenic as As	8.4	0.084	0.5	2	25
DETSC 2306 Barium as Ba	11	0.11	20	100	300
DETSC 2306 Cadmium as Cd	< 0.030	< 0.02	0.04	1	5
DETSC 2306 Chromium as Cr	3.1	< 0.1	0.5	10	70
DETSC 2306 Copper as Cu	4.6	0.046	2	50	100
DETSC 2306 Mercury as Hg	< 0.010	< 0.002	0.01	0.2	2
DETSC 2306 Molybdenum as Mo	< 1.1	< 0.1	0.5	10	30
DETSC 2306 Nickel as Ni	< 0.50	< 0.1	0.4	10	40
DETSC 2306 Lead as Pb	1.1	< 0.05	0.5	10	50
DETSC 2306 Antimony as Sb	5	0.05	0.06	0.7	5
DETSC 2306 Selenium as Se	0.35	< 0.03	0.1	0.5	7
DETSC 2306 Zinc as Zn	< 1.3	< 0.01	4	50	200
DETSC 2055 Chloride as Cl	4800	< 100	800	15,000	25,000
DETSC 2055* Fluoride as F	< 100	< 0.1	10	150	500
DETSC 2055 Sulphate as SO4	6600	< 100	1000	20,000	50,000
DETSC 2009* Total Dissolved Solids	47000	470	4000	60,000	100,000
DETSC 2130 Phenol Index	< 100	< 1	1	n/a	n/a
DETSC 2085 Dissolved Organic Carbon	< 2000	< 50	500	800	1000

TBE - To Be Evaluated
SNRHW - Stable Non-Reactive Hazardous Waste

Additional Information

DETSC 2008 pH	9.4
DETSC 2009 Conductivity uS/cm	67.4
* Temperature*	18.0

Mass of Sample Kg*	0.120
Mass of dry Sample Kg*	0.100

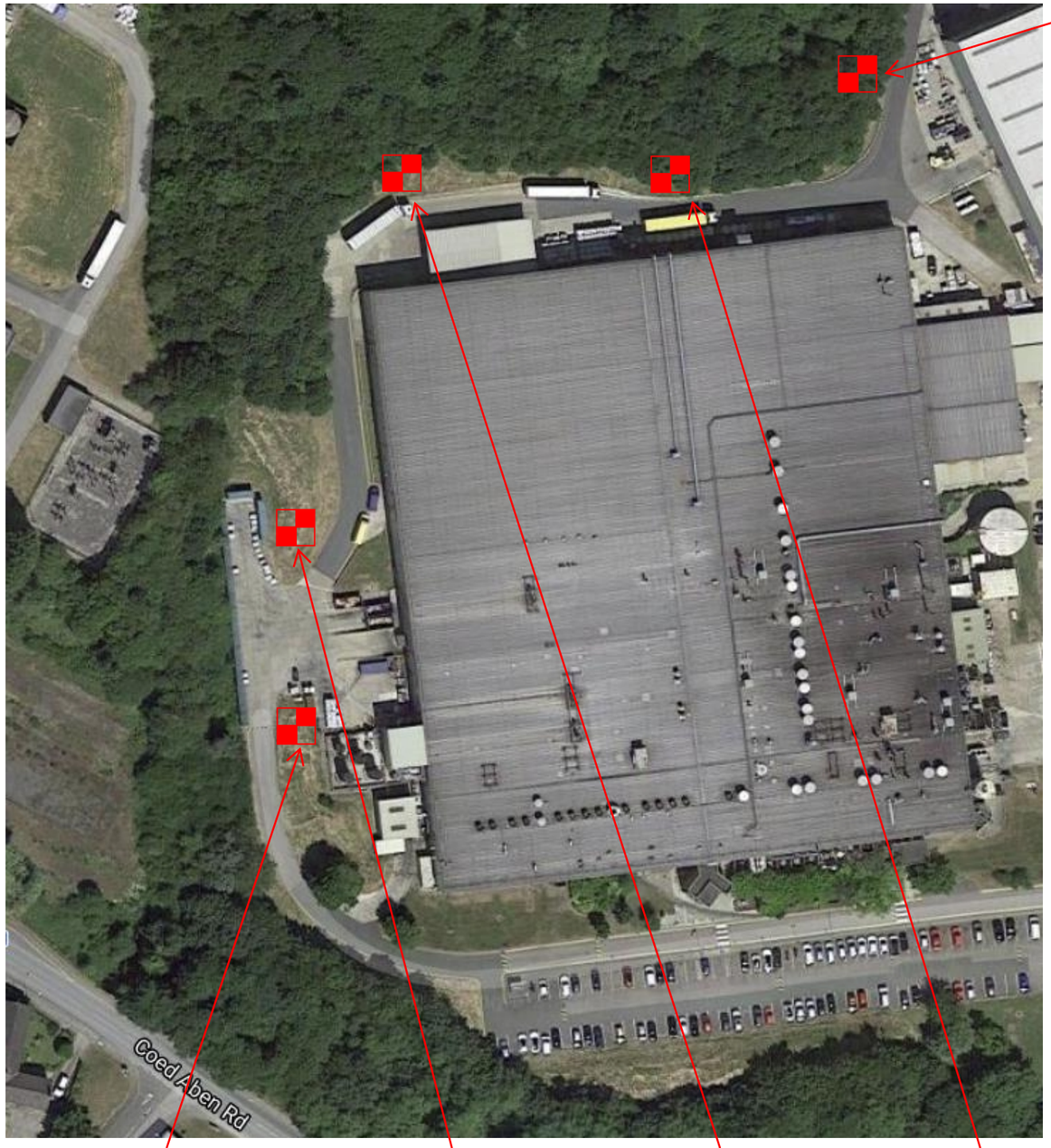
Stage 1

Volume of Leachant L2*	0.978
Volume of Eluate VE1*	0.93

Disclaimer: *The WAC limit values are provided for guidance only. DETS does not accept responsibility for errors or omissions. Values are correct at time of issue.*

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APPENDIX C



Sample location 5

Sample location 1

Sample location 2

Sample location 3

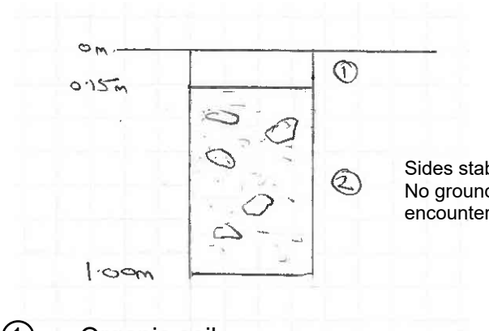
Sample location 4

KEY:

LOCATION OF EXCAVATOR TRIAL PIT
SAMPLES TAKEN AT 1M DEPTH

SL1

SL1

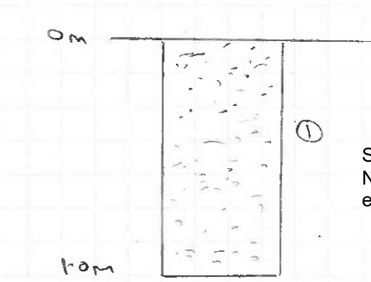


Sides stable.
No groundwater encountered

① Organic soil

② Brown gravelly clay with brick fragments

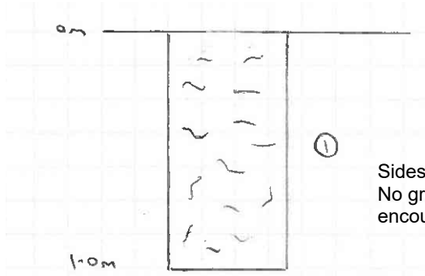
SL2



Sides stable.
No groundwater encountered

① Brown gravelly clay with grey veins

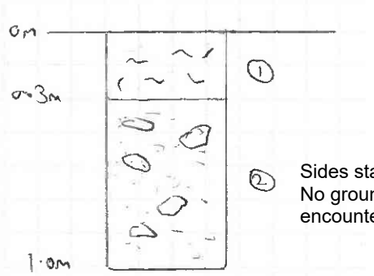
SL3



Sides stable.
No groundwater encountered

① Organic soil with rootlets

SL4

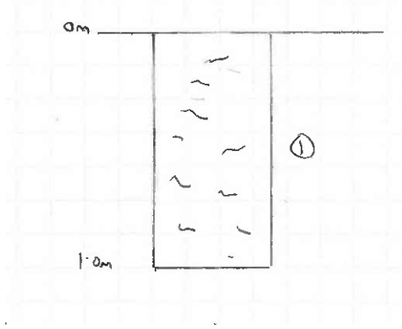


Sides stable.
No groundwater encountered

① Organic soil with rootlets

② Gravelly clay with concrete and brick fragments

SL5



① Organic soil with rootlets

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TITLE	Sample Location Plan	PROJECT	Ardagh Group Wrexham	DATRYS MODELU DYLUNIO PEIRIANNEG MODEL DESIGN ENGINEERING	Job No. 21034	DATE 10.03.21	SCALE NTS
					ACAD Ref. -	CHECKED JA	PASSED WL
					DRAWN WL	DRG No. 21034/SK01	REV