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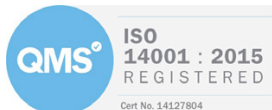
PHASE 3

REMEDIATION STRATEGY REPORT

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Phase 3: Remediation Strategy

Location: **Land off Wood Lane**
Colnebridge, Huddersfield, West Yorkshire HD5 0PX

For: Steve Douthwaite

Report No. C4435/24/E/6780

Report date: June 2024

For and on behalf of **Rogers Geotechnical Services Ltd**

Steven Hale BSc FGS
Geo-environmental Technician

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1. Introduction

Further to the site-specific risk assessment provided within the geo-environmental report (C3637/23/E/5969_Rev1) and subsequent gas monitoring letter (C3637/23/E/GM), it is considered that some remediation will be required at this site. This report provides the strategy for that remediation.

From the geo-environmental investigation, it was considered that the made ground present at the site was contaminated with respect to the intended residential with plant uptake end use. Therefore, it was recommended that garden areas be 'remediated' by providing a capping layer of 500mm of inert material over a 100mm thick capillary break.

2. Remediation Strategy

2.1 Remediation Objectives

Based on the site-specific risk assessment provided in the geo-environmental report and gas monitoring letter, the object of remediation at the site is as follows:

- To protect the site operatives during the construction process from the ingestion of soil or dust, dermal contact with the soil and inhalation of dust.
- To protect the end user from the ingestion of soil or dust, dermal contact with the soil and inhalation of dust.
- To protect neighbours from the inhalation and ingestion dust during the construction process.

- To protect plants from direct contact with contamination and prevent uptake via root system.
- To ensure that contamination cannot reach controlled waters via surface run-off or permeable strata.
- To ensure that contamination cannot enter any former services occupying the site which may return to controlled waters.
- To protect plastic services from being penetrated by, or degrading due to the presence of, contamination in the soil or groundwaters.

2.2 Development Requirements.

The site is to be developed by the alterations to the existing agricultural barn to form one residential dwelling. Therefore, it is considered that the site may be classified as a residential with plant uptake development.

3. Scope

In order to fulfil the objectives defined above the following remedial strategy will be utilised. A pragmatic approach will be undertaken, with observational techniques being employed at each stage of the work.

3.1 Groundworks

During the ground-works phase of the development, protection to the site operatives is required. The risk to site operatives is considered under the Health and Safety at Work Act 1974, together with regulations made under the act, which includes the Control of Substances Hazardous to Health (COSHH) regulations. Therefore, the risks to site personnel must be considered under the Construction Design and Management (CDM) regulations at the planning stage and be included in the contractor's Health and Safety Plan and site-specific Method Statements. These documents should include the following main elements.

- Site operatives at all levels shall be made aware of the hazards of working with contaminated soils and the potential hazards associated with materials containing volatile hydrocarbons.
- Personal hygiene facilities, including washing and messing, must be provided and site operatives be encouraged to use them.
- Where work is undertaken in dry weather the site should be dampened down to avoid dust. In addition, dust masks must be provided to all site operatives for use in dry weather.
- In order for contaminated soils to be disposed of to an appropriate landfill, it may be necessary to carry out Waste Acceptance Criteria (WAC) testing in accordance with BS EN 12457.
- Any stockpiles of contaminated soil on site shall be sheeted over to prevent excessive amounts of airborne dust and cross contamination of imported fill.
- Where vehicles are transferring soil to the landfill site they should be covered to prevent contamination of the surrounding area by dust.

- Where work is undertaken in wet weather, vehicle and wheel washing facilities are required to ensure that the vehicles leaving the site do not transfer contamination to surrounding areas.

On completion of the ground-works a careful site inspection of the sub-grade would be required. Should visual or olfactory evidence of contamination be revealed then further testing may become necessary.

3.2 Construction

During the construction phase of the contract the following items are required to protect the end user from the potential contaminants revealed at this site.

- Beneath buildings, pavements and hard-standings clean inert granular sub-base shall be employed.
- Any redundant services revealed at this site shall be de-commissioned and piped services sealed. Any existing services that are to be employed in the new development will be carefully inspected to ensure that they are serviceable.
- New plastic services shall be constructed in a surround of clean inert material and selected in accordance with the recommendation given in the United Kingdom Water Industry Research (UKWIR) website under Report Ref. No. 10/WM/03/21 - 'Guidance for the Selection of Water Supply Pipes to be used in Brownfield Sites'. The statutory water authority for the area in which site is located may have a risk assessment form to complete which allows these recommendations to be met. However, further determinand specification contamination testing may be necessary.
- For buried concrete the results of the sulphate and pH testing indicate that the design sulphate class for the site is DS-1.

3.3 Landscaped Areas

In view of this and the potential contamination on site, it is considered that landscaped areas will require some remediation. This shall include the provision of a clean cover system including a capping layer of say 500mm of inert material, which will put the contaminated ground out of the end users' dig range. At the base of this layer, a granular capillary break of say 100mm of free draining granular soil shall be placed in order to prevent mobile contamination rising upward. This expedient will also provide a suitable root barrier to isolate the plants from the underlying contaminated ground.

3.4 Gas Protection Measures

In order to assess the protection measures required BS8485: 2015+A1:2019: *Code of practice for the design of protective measures for methane and carbon dioxide ground gases for new buildings* has been employed. The site has classified as Characteristic Situation Level 1, therefore no protection measures are required.

3.5 Fill Materials

It shall also be appreciated that any fill material, either site-won or imported, to be employed at the site will be subjected to the following assessment to determine its suitability.

Fill materials shall be initially screened, by a suitably qualified engineer to establish that:

- It is a suitable growing media if it is to be employed as such, including compliance with BS3882 (2015)
- It is free from obvious contamination i.e. visual or olfactory evidence
- It has not come from areas where Japanese Knotweed or other invasive or injurious plants are suspected to be growing
- It is not a statutory nuisance, such as being odorous
- It is free from unsuitable material i.e. whole bricks, brick ties, timber or glass.

It shall also be appreciated that any fill should be subjected to validation testing to assess its suitability. The following table has been taken from YALPAG¹ documentation and may be used as a guide. Depending on the origin and nature of the material, not all fill will require the sampling frequency and testing indicated, although this should be in agreement with any regulatory bodies (such as the Local Authority).

Table 1: Validation Sampling and Testing		
Fill Type	Frequency	Minimum Determinands
Virgin Quarried Material	1 or 2 depending on the type of stone utilised, to confirm the inert nature of the material.	Standard metals/metalloids (should include as a minimum As, Cd, Cr, CrVI, Cu, Hg, Ni, Pb, Se, Zn)
Crushed Hardcore, Stone, Brick	Minimum 1 per 500m ³	Standard metals/metalloids (as above), PAH (16 USEPA speciation), asbestos, total TPH. Any additional analysis dependant on the history of the donor site (e.g. phenol, total cyanide, BTEX, MTBE).
Greenfield/ Manufactured Soils	Minimum 3 Dependent on source and receptor, between 1 per 50m ³ and 1 per 250m ³	Standard metals/metalloids (as above), PAH (16 USEPA speciation), asbestos, pH and soil organic matter (SOM) (or calculated from total organic carbon (TOC)).
Brownfield/ Screened Soils	Minimum 6 Dependent on source and receptor, between 1 per 50m ³ and 1 per 100m ³	Standard metals/ metalloids (as above), PAH (16 USEPA speciation), TPH (CWG banded), asbestos, pH and SOM (or calculated from TOC). Any additional analysis dependant on the history of the donor site (e.g. phenol, total cyanide, BTEX, MTBE)..

It shall be noted that screening values for the above regime have been included within Appendix 1 of this report. The screening values will need to be agreed with any regulatory bodies. It is anticipated, for example, that 1% SOM values will be employed for typical granular fill and 6% SOM for topsoil. However, organic matter testing will determine which screening values are appropriate for each material. Moreover, testing will comply with UKAS and MCERTS, where applicable, and undertaken by an accredited laboratory.

Where the material has been derived from a commercial company, certificates or other industry quality protocol compliance i.e. WRAP shall be obtained. However, it will be necessary to ensure that this documentation is specifically related to the material being imported, is no more than two months old and complies with the screening and frequency requirements given above.

¹ YALPAG Technical Guidance for Developers, Landowners and Consultants – Verification Requirements for Cover Systems V4 .1 Appendix 1a, June 2021

Suitable fill materials will either be placed immediately or sufficiently quarantined to prevent cross-contamination. If it is necessary, the quarantined material will be placed on appropriate sheeting and covered to prevent it becoming mixed with contaminated soils or dust, or penetrated by mobile contaminants.

4. Verification Report

In order to demonstrate that the remediation has been sufficiently carried out and risks highlighted in the conceptual ground model are mitigated, a verification report will be produced and submitted to any statutory authorities.

The report will be produced by a suitably qualified engineer or engineers and will include the following:

4.1 Ground Works

- A record of the measures taken to cap and seal any disused services.
- The methods used for handling and final destination of any contaminated soils removed from the site.
- The qualifications or relevant experience/training of the persons carrying out the verification.

4.2 Imported Fill and Removal of Contaminated Made Ground/Topsoil

- The assessment of the extents of any contamination identified including the details of sampling points, such as location and descriptive logs, and the results of any chemical testing.
- The extents of any areas where made ground has been wholly removed.
- Characterisation of the suitability of the clean material including the derivation of the material, comments from a visual screen, the tests results of chemical screening, delivery tickets where appropriate and the conditions by which the clean material has been stored and handled on site.
- Photographic and logged evidence the clean material has been handled on site and placed in a sufficient thickness over areas where made ground remains. This may be either at the time of placement or after placement by means of hand excavated trial pits. Photographs shall include visual site references or reference boards to prove the location and date taken. A measurement reference shall be visible in the photographs to substantiate the thickness of material placed. Please note that it may also be necessary to undertake a topographical survey and the requirement for which will be checked with any statutory authorities.

We trust that this information is of interest, clearly Rogers Geotechnical Services Ltd would be happy to offer advice with respect to the above and assist where necessary.

Appendix 1

Soil Screening Values

Rogers Geotechnical Services Ltd.

Atkins ATRISK Soil Screening Values (SSVs) - Residential With Plant Uptake Landuse

Tox Data Report No.	Compound	Residential with Homegrown Produce Landuse (mg/kg)				Reference
	<i>Metals</i>	SOM: 1%		SOM: 6%		
3	Cadmium	22.1		22.1		C
4	Chromium VI	3.62	20.5	3.63	20.5	B/C
	Copper	4730		4790		A+
7	Mercury	8.81		15.80		A/D
8	Nickel	136		136		A+
	Lead	200		200		C
	Zinc	20000		20300		A+
	Vanadium	136		138		A+
	<i>Semi and Non Metals</i>					
1	Arsenic	37		37		C
10	Selenium	375		375		A
	Free Cyanide	34		34		A
9	Phenols (total)	267		1200		A
	<i>Poly Aromatic Hydrocarbons</i>	Free product	No free product	Free product	No free product	
20	Napthalene	0.829		12.2		A+
	Acenaphthene	157	608	2760		A+
	Fluorene	735		2610		A+
	Anthracene	10200		26200		A+
	Fluoranthene	983		2980		A+
	Pyrene	668		2120		A+
	Benzo(a)anthracene	1.71	4.52			A
2	Chrysene	0.44	585			A
2	Benzo(b)fluoranthene	1.22	7.72			A
2	Benzo(k)fluoranthene	0.686	84.4			A
2	Benzo(a)pyrene	1.51	4.95	2.05	4.95	B/C
2	Dibenzo(a,h)anthracene	0.00393	0.838			A*
2	Indeno(1,2,3-cd)pyrene	0.0614	7.31			A
2	Benzo(g,h,i)perylene	0.0187	96.2			A
	<i>Petroleum Hydrocarbons</i>					
	Aliphatic C5-C6	42.7		369		A+
	Aliphatic C6-C8	99.3		768	1240	A+
	Aliphatic C8-C10	13.9		204		A+
	Aliphatic C10-C12	49.9	81.7	297	1180	A+
	Aliphatic C12-C16	20.9	385	125	4130	A+
	Aliphatic C16-C21	210000		210100		A+
	Aliphatic C21-C35	210000		210100		A+
	Aromatic C5-C7 (Benzene)	0.137		0.871		A+
	Aromatic C7-C8 (Toluene)	113		780		A+
	Aromatic C8-C10	20.5		232		A+
	Aromatic C10-C12	70		468		A+
	Aromatic C12-C16	155	165	830		A+
	Aromatic C16-C21	319		1040		A+
	Aromatic C21-C35	1120		1710		A+
<i>Others</i>						
Asbestos Not Detected						
A+ = Values update June 2017.						
A* Atrisk's SSV is lower than Chemtest's detectable limit for this compound.						
B = Health Criterion Values (available from toxicological reviews published in the C4SL project methodology report).						
C = Category 4 Screening Levels (C4SLs).						
D = SSV provided is for Methyl Mercury.						