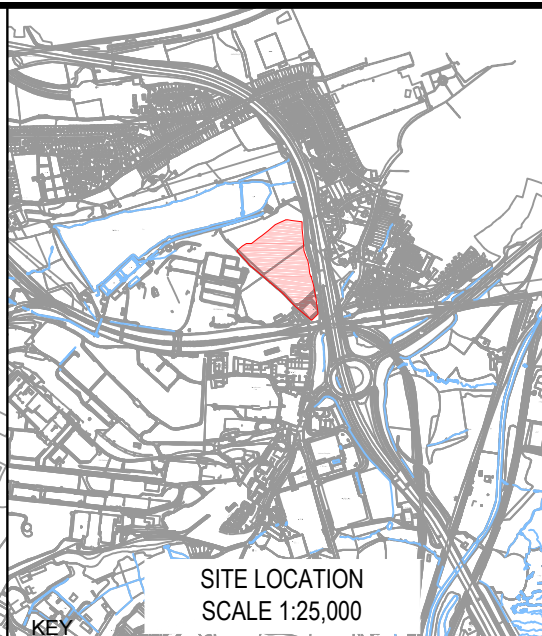
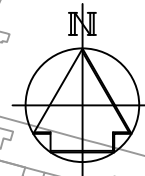




MONITOR BOUNDARY PHASE 53

REVISIONS	Drawn By	Checked By	Date
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PURPOSE OF ISSUE	Rev.	Authorised for Issue	Date
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Atkins Limited	
Telford Office Cornerstone House Stafford Park 13 Telford TF3 3AZ	Birmingham Office The Axis, 10 Holliday Street Birmingham West Midlands B1 1TF
Tel 01952 201234 Fax 01952 200981	Tel 0121 483 5000 Fax 0121 483 5252

THIS DRAWING IS NOT TO BE SCALED

CLIENT

ST.MODWEN

PROJECT

COED DARCY

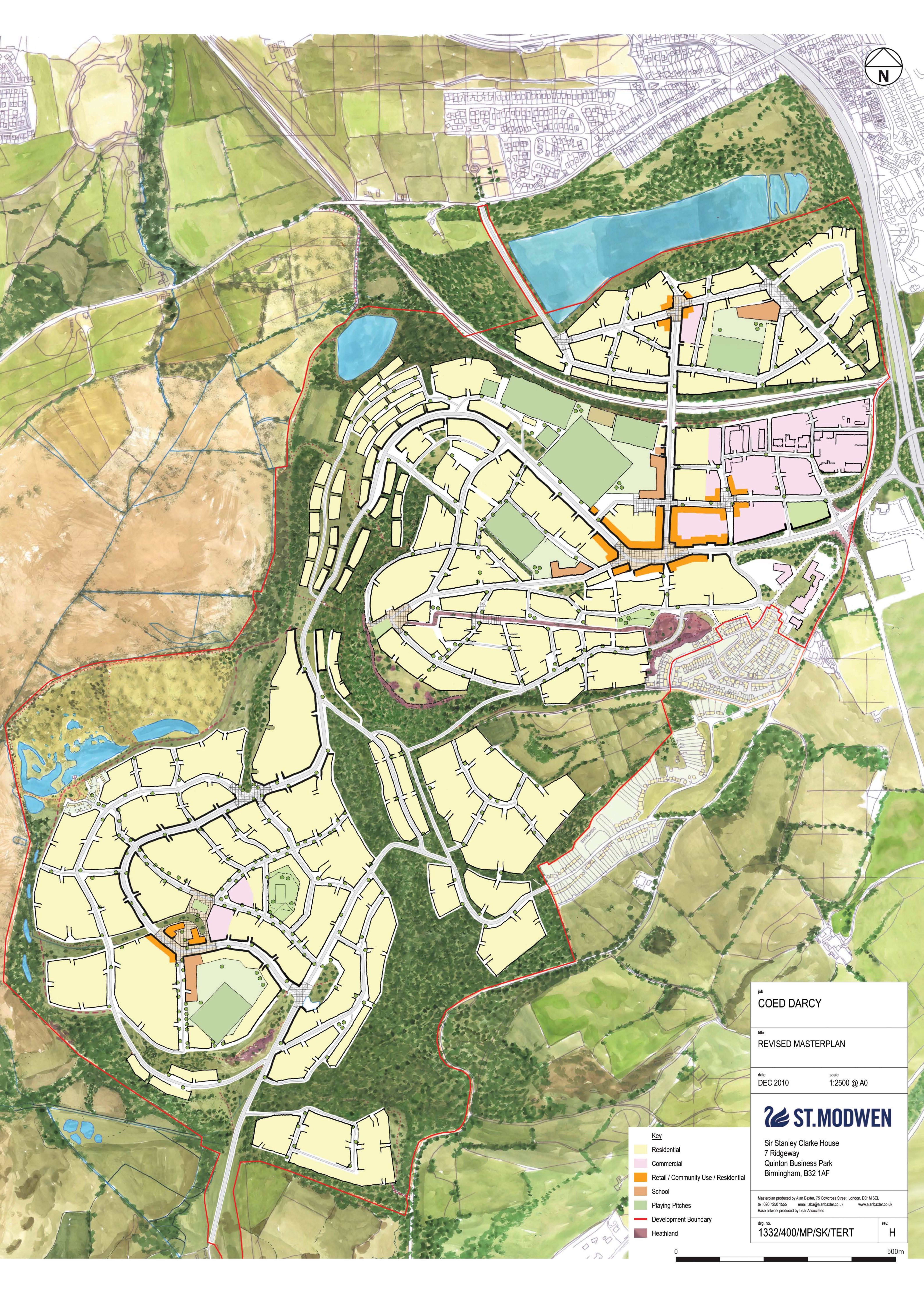
DRAWING TITLE

MONITOR BOUNDARY PHASE 53

SCALES	DRAWN	CHECKED	CO-ORD CHECK
1:2500	MJ	CS	
	DATE	DATE	DATE
	06.02.15	06.02.15	

0	SHEET A3	PLOT DATE 09.02.15
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DRAWING NO	5041216-REM-DWG-1777	REV	-
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- Key**
- Residential
 - Commercial
 - Retail / Community Use / Residential
 - School
 - Playing Pitches
 - Development Boundary
 - Heathland

job COED DARCY	
title REVISED MASTERPLAN	
date DEC 2010	scale 1:2500 @ A0
 ST. MODWEN	
Sir Stanley Clarke House 7 Ridgeway Quinton Business Park Birmingham, B32 1AF	
Masterplan produced by Alan Baxter, 75 Cowcross Street, London, EC1M 6EL tel: 020 7250 1555 email: aba@alanbaxter.co.uk www.alanbaxter.co.uk Base artwork produced by Lear Associates	
drp. no. 1332/400/MP/SK/TERT	rev. H

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APPENDIX B SCHEDULE 8 OF THE SECTION 106 AGREEMENT

SCHEDULE 8

Redevelopment Remediation Works

Purpose, objectives and requirements of the Redevelopment Remediation Works

Part 1

1. Purpose and objectives of the Redevelopment Remediation Works

- 1.1 The purpose and objectives of the Redevelopment Remediation Works are the carrying out of all such Remedial Action over and above that actually carried out as part of the RAP Works that is necessary in order to make each part of the Property suitable within the meaning of paragraph 1.2 below for its Intended Use or such other use as may be determined from time to time.
- 1.2 A part of the Property will only be suitable for its Intended Use or such other use as may be determined from time to time if and when the Phase Works Completion Date is declared in respect of that part of the Property.

Part 2

2. Developer's obligations regarding Redevelopment Remediation Works

- 2.1 The Developer shall carry out or procure the carrying out of all Remedial Action necessary in order to achieve the purpose and objectives set out in Part 1 of this Schedule.
- 2.2 The design and specification of the Redevelopment Remediation Works shall take appropriate account of the principles and objectives (as set out in sub-paragraph 1.3 (including 1.3.1-1.3.5 thereof) of Schedule 7 hereto) and the design assumptions of the RAP Works and shall not prejudice the achievement and future sustainability of these principles and objectives of the RAP Works or the RAP Works themselves.
- 2.3 The Redevelopment Remediation Works may reduce the reliance on the RAP Works to achieve the principles and objectives of the RAP Works set out in sub-paragraph 1.3 (including 1.3.1-1.3.5 thereof) of Schedule 7 hereto but must not increase that reliance.
- 2.4 The RBSLs set out in Tables 1 and 2 below and the aesthetic criteria, remediation quality and scope (including the depth below Final Finished Level to which quality standards are achieved) as also set out in Part 3 below, as the same may be varied in accordance with this Schedule 8, shall be achieved for each part of the Property at the minimum validation frequencies set out in clause 8 of Part 3 (as applicable depending upon whether such part of the Property is intended for use as residential, commercial or recreational land) as a minimum base level standard.
- 2.5 Without prejudice to the requirement to achieve the RBSLs set out in Tables 1 and 2 as a minimum base level standard, the Developer shall ensure that all necessary remediation targets are developed and used to determine the extent and quality of remediation appropriate to the development design and purpose of the Urban Village and the Pre-Transfer Date Contamination.
- 2.6 The Developer shall promptly notify CDL and the Monitor if at any time it or any person acting on its behalf identifies a substance present at, in, on or under the

Property, or has reasonable cause to suspect such presence, for which no RBSL is specified in Tables 1 or 2 of Part 3 below in which case the following procedure shall apply:

- 2.6.1 As soon as reasonably practicable after serving a notice under paragraph 2.6 above, the Developer shall prepare proposals for soil and groundwater RBSLs for the substance identified that are consistent with the purpose and objectives of the Redevelopment Remediation Works as set out in Part 1 of this Schedule and the standards of prevailing Environmental Law and shall provide a copy of such proposals to CDL the Monitor and the Authority. Any such proposal shall contain a detailed statement of the health risk assessment and general methodology from which the proposed RBSLs have been derived.
 - 2.6.2 Not earlier than 10 Working Days after submitting its proposals to CDL the Monitor and the Authority in accordance with sub-paragraph 2.6.1 above, the Developer shall submit a written request to the appropriate Environmental Authorities, copied at the same time to CDL the Monitor and the Authority, for approval of the use of the proposed RBSLs. The Developer shall provide to the appropriate Environmental Authorities with its request copies of the health risk assessment and general methodology referred to in sub-paragraph 2.6.1 above and a copy of this Agreement clearly drawing attention to the purpose, objectives and requirements of the Redevelopment Remediation Works set out therein and the proposed changes thereto.
 - 2.6.3 Each of the Developer, CDL and the Monitor shall be free at any time to make such submissions to the appropriate Environmental Authorities in relation to the Developer's proposals as they see fit, provided such submissions are made in writing and copied to each other and the Authority at the same time.
 - 2.6.4 The Developer shall ensure that the Redevelopment Remediation Works achieve compliance with any RBSLs approved in writing by the appropriate Environmental Authorities pursuant to this paragraph 2.6, as if they were also set out in Tables 1 and 2 of Part 3 of this Schedule.
- 2.7 The Developer may at any time propose variations to the requirements of clauses 3 to 8 inclusive of this Schedule 8 below to the appropriate Environmental Authorities and to the Authority pursuant and to the extent required to comply with the Planning Permission to take account of changes of circumstances since the date of this Agreement, provided no variation shall be proposed that is in any way prejudicial to the achievement of the purpose and objectives of the Redevelopment Remediation Works as set out in Part 1 above and, in particular, the achievement of the RBSLs set out in Tables 1 and 2 above (as previously amended in accordance with paragraph 2.6 above if applicable) and provided further that
- 2.7.1 Any such proposals shall be submitted in writing to CDL the Monitor and the Authority at least 10 Working Days before they are submitted to any Environmental Authority;
 - 2.7.2 Any such proposal submitted to any Environmental Authority shall be copied to CDL the Monitor and the Authority at the same time;
 - 2.7.3 The Developer shall enclose a copy of this Agreement with any such proposal made to any Environmental Authority clearly drawing attention to the

purpose, objectives and requirements of the Redevelopment Remediation Works set out therein and the proposed changes thereto;

- 2.7.4 Each of the Developer, CDL and the Monitor shall be free to make such submissions to the appropriate Environmental Authorities in relation to the Developer's proposals as they see fit, provided such submissions are made in writing and copied to each other and the Authority at the same time.
 - 2.7.5 Subject to paragraph 2.7.6 no such proposed variation shall be implemented unless, it has been approved in writing by the appropriate Environmental Authorities in accordance with the requirements of this clause 2.7.
 - 2.7.6 If the Developer has only oral approval (or non objection) to a proposed variation from the relevant Environmental Authorities, no such proposed variation shall be implemented unless the Developer notifies the relevant Environmental Authorities in writing (copied at the same time to CDL the Monitor and the Authority) that it proposes to proceed with the implementation of the proposed variation to the Redevelopment Remediation Works 10 Business Days after the date of such notice and no written objections of any relevant Environmental Authority are received within such 10 Business Day period in respect of the same.
 - 2.7.7 Any reference in this Agreement to the Redevelopment Remediation Works shall be to the Redevelopment Remediation Works as varied in accordance with this paragraph 2.
- 2.8 The Developer shall, and shall procure that any person acting on its behalf in relation to any aspect of the Redevelopment Remediation Works required by this Schedule 8 shall, at all times comply with the requirements of Schedule 10 (General Remediation Requirements).

Part 3

Table 1 – Summary of Soil RBSLs

Contaminant	Land-Use Specific Soil RBSL Surface to 1m below FFL (mg/kg) ¹			Land-Use Specific RBSL Soil below 1m depth (mg/kg)		
	Residential	Commercial	Recreational	Residential	Commercial	Recreational
METALS & METALLOIDS						
Arsenic	64	500	64	-	-	-
Cadmium	2.6	1400	2.6	-	-	-
Chromium	130	5000	200	-	-	-
Mercury	1	480	1	-	-	-
Nickel	50	5000	75	-	-	-
Selenium	3	8000	3	-	-	-
Lead	337	750	337	-	-	-
Vanadium	416	16000	640	-	-	-
Copper	478	-	478	-	-	-
Zinc	200	-	200	-	-	-
ORGANIC SPECIES						
Benzene	0.12	5	13	0.4	5	48
Benzo(a)pyrene ²	0.9	29	0.9	none	none	none
Toluene	36	1160	8110	52	389	none
Ethylbenzene	41	122000	4740	140	none	none
Xylenes	32	121000	7940	58	none	none
1,2-Dichloroethane	0.04	2	4.5	0.1	0.65	6
Dichloromethane	5	1650	241	84	665	6220
Tetrachloroethene	11	1050	641	34	368	1780
Trichloroethene	1	84	193	2	28	269
Vinyl Chloride	0.01	4	0.7	0.04	1.6	16
1,2 Dichloroethene	4	273	632	7	91	881
1,1,1-Trichloroethane	154	577000	27900	160	3250	none
TPH Aromatic EC>C7-C8	125	1840	21337	146	617	none
TPH Aromatic EC>C8-C10	94	913	4025	257	547	none
TPH Aromatic EC>C10-C12	118	26515	4589	1394	none	none
TPH Aromatic EC>C12-C16	131	64875	4799	none	none	none
TPH Aromatic EC>C16-C21	82	51449	3639	none	none	none
TPH Aromatic EC>C21-C35	1130	51449	3639	none	none	none

TPH Aliphatic EC>C6-C8	8335	8517587	606191	none	none	none
TPH Aliphatic EC>C8-C10	112	158890	12075	158	none	none
TPH Aliphatic EC>C10-C12	3204	163360	12094	none	none	none
TPH Aliphatic EC>C12-C16	4513	169032	12117	none	none	none
TPH Aliphatic EC>C16-C21	94174	3429944	242573	none	none	none
TPH Aliphatic EC>C21-C35	94820	3429944	242573	none	none	none
Total TPH (Phase 1) ³	1717	81413	9061	9182	81956	none
Total TPH (Process Area) ³	2601	44344	10830	4098	35014	none
Total TPH (North Tank Farm) ³	1104	25875	9419	3802	13974	none
Total TPH (South Tank Farm) ²	1015	37230	6349	2792	34797	none
ASBESTOS						
Sum of all Types of ACM	200	300	200	200 ⁴	-	-

“-“ value not applicable to scenario

“none” RSBL value exceeds soil saturation limits and free phase assessment appropriate

¹ Lower value of human health RBSL or Soil Code value if higher than background LCL value (applicable to metals & metalloids only)

² Benzo(a)pyrene RBSL to be compared against sum of 16 US EPA Priority List PAHs using Toxicity Equivalence approach

³ ‘Total’ TPH RBSL derived for an area of development, based on individual RBSLs provided and available mass fraction TPH data in soil at time of derivation, using the inverse weighted average approach.

⁴ See text below for specification of relevant depth ranges

Table 2 – Summary of RBSLs for Groundwater

Contaminant	Land-Use Specific RBSL (mg/l)		
	Residential	Commercial	Recreational
TPH Aliphatic EC>C6-C8	none	none	none
TPH Aliphatic EC>C8-C10	none	none	none
TPH Aliphatic EC>C10-C12	none	none	none
TPH Aliphatic EC>C12-C16	none	none	none
TPH Aliphatic EC>C16-C21	none	none	none
TPH Aliphatic EC>C21-C35	none	none	none
TPH Aromatic EC>C7-C8	20	97	none
TPH Aromatic EC>C8-C10	22	none	none
TPH Aromatic EC>C10-C12	none	none	none
TPH Aromatic EC>C12-C16	none	none	none
TPH Aromatic EC>C16-C21	none	none	none
TPH Aromatic EC>C21-C35	none	none	none
Benzene	0.7	6	198
Benzo(a)pyrene	none	none	none
Toluene	47	229	none
Ethylbenzene	102	506	none
Xylenes	43	607	none
1,2-Dichloroethane	0.2	0.82	45
Dichloromethane	150	624	none
Tetrachloroethene	22	115	none
Trichloroethene	2.6	13	813
Vinyl Chloride	0.06	0.3	18
1,2-Dichloroethene	15	68	none
1,1,1-Trichloroethane	193	989	none

“none”= theoretical RBSL greater than solubility limit

3. Scale of aesthetic criteria

Table 3 – Scale of aesthetic criteria

Class	Visual	Olfactory
0	No visible staining of soil, no visible suspect ACM	No detectable odour on soil
1	Occasional staining of soil, no visible suspect ACM	Faint odour on soil
2	Frequent staining of soil	Distinct but not strong odour on soil
3	Occasional heavy staining of soil	Strong odour on soil
4	Heavy staining of soil	Strong odour discernable in ambient air
5	Visible hydrocarbon product	Overwhelming Odour

3.1 Visible suspect ACM refers to asbestos containing material visible to the naked eye which a reasonable and prudent person used to managing asbestos may suspect to be asbestos containing.

3.2 All references in Table 1 above to depths to which minimum RBSLs are to be achieved are expressed below, relative to FFL following completion of construction of the intended Urban Village.

4. Residential End-Use where Groundwater is Primarily in Rock

4.1 This remediation scenario is intended to refer to residential end-use in areas where there is limited soil material over bedrock, little perched groundwater is present in that soil, and the water table is normally first encountered in bedrock. Areas of the Property with these characteristics include the more elevated parts of the former process area and of the southern tank farm. The minimum Remedial Action required in this scenario is as follows:

4.2 All oil saturated soil should be removed.

4.3 All soils must be remediated so as to meet the RBSLs for TPH, BTEX and PAHs at the relevant depth relative to FFL and the aesthetic criteria Class 2 or better at greater than 1m below FFL.

4.4 The aesthetic quality of soils shall be Class 1 or better for at least the first metre below FFL.

4.5 Soils where there is visible ash and clinker, or metal concentrations above RBSLs, are to be removed so that none is retained within the first metre below FFL in garden areas.

4.6 Where it is not practicable to address groundwater contamination within bedrock this must be controlled, e.g. where seeps, sheens and iron staining discharge from the bedrock. Acceptable methodologies for remediation may include, but are not limited to, the use of land drainage via interceptors. Control measures should result in no visible discharge at surface and little or no odour observable.

4.7 All soil potentially containing dispersed asbestos fibres or visible ACM must be removed or remediated to meet in bulk, considering both dispersed fibres and pieces

of ACM, the appropriate ACM RBSL, or to meet the requirements of relevant Environmental Authorities, whichever is the more conservative.

5. Residential End-Use where Groundwater is in soil

- 5.1 This remediation scenario is intended to refer to residential end-use in areas where there is sufficient soil material over bedrock to commonly contain perched groundwater such that the water table is normally first encountered in soil. Areas of the Property with these characteristics include the lower parts of the former process area and of the southern tank farm and the north site tank farm. The minimum Remedial Action required in this scenario is as follows.
- 5.2 All oil saturated soils and free product shall be removed.
- 5.3 Soils must be remediated so as to meet the RBSLs for TPH, BTEX and PAHs to a minimum depth of 0.5m below the likely seasonal minimum groundwater depth following development of the intended Urban Village. This depth is to be established by consideration of all available groundwater level monitoring data relevant for each area. All soil must meet aesthetic criteria Class 2 or better to the same depth.
- 5.4 All soil must meet aesthetic criteria Class 1 or better to at least 1m below FFL.
- 5.5 Soils where there is visible ash and clinker or metal concentrations above RBSLs to be replaced to at least 1m below FFL.
- 5.6 All soil potentially containing dispersed asbestos fibres or visible ACM must be removed or remediated to meet in bulk, considering both dispersed fibres and pieces of ACM, the appropriate ACM RBSL, or the requirements of relevant Environmental Authorities, whichever is the more conservative, to a minimum depth of 2m below FFL.
- 5.7 Where there is a risk of the migration in ground of hazardous gas or vapour or contaminated liquid into remediated areas, the Developer shall take all necessary measures appropriate to prevent this occurring, including monitoring whatever measures are put in place after their installation to continue to demonstrate their effectiveness. Such measures could include the installation of interception trenches and management of discharge from these.
- 5.8 Where necessary, seeps, sheens and iron rich discharges from the bedrock must be permanently controlled such that there is no visible discharge at surface and little or no odour detectable. Acceptable methodologies for remediation may include, but are not limited to the use of land drainage via interceptors.

6. Commercial End-Use where Groundwater is in soil

- 6.1 This remediation scenario is intended to refer to commercial end-use in areas where there is sufficient soil material over bedrock to commonly contain perched groundwater such that the water table is normally first encountered in soil. The area identified for commercial development in the Masterplan is the lower part of the former process area, which in general terms has these characteristics. Based on the Masterplan, no commercial developments are currently envisaged where groundwater is primarily encountered only in rock; in the event such development is proposed, Remedial Action consistent with the standards specified below would be required, adapted as necessary to local conditions.

- 6.2 All oil saturated soils and soil containing free product other than minor sheens shall be removed to a minimum depth of 2 m FFL or 0.5 m below the likely lowest seasonal groundwater elevation following development of the intended Urban Village, whichever is the deeper. This depth is to be established by consideration of all available groundwater level monitoring data.
- 6.3 All soils must meet the RBSL for TPH to at least 1m below FFL.
- 6.4 All soils must meet in bulk, considering both dispersed fibres and pieces of ACM”, the RBSL for ACM to at least 1m below FFL and any visible ACM encountered during construction in the first 1m below FFL is to be removed.
- 6.5 Where there is a risk of the migration in ground of hazardous gas or contaminated liquid into remediated areas, the Developer shall take all appropriate measures to prevent this occurring. Such measures could include the installation of interception trenches and management of discharge from those. The Developer shall monitor whatever measures are put in place after their installation to continue to demonstrate their effectiveness.
- 6.6 Where necessary, seeps, sheens and iron rich discharges from the bedrock must be controlled such that there is no visible discharge at surface and little or no odour. Acceptable methodologies for remediation may include, but are not limited to the use of land drainage via interceptors.

7. **Public Open Space**

- 7.1 The Developer shall remediate areas of the Property which will not be developed for residential or commercial end-uses based on those areas falling into one of the following three broad categories of land-use:
 - 7.1.1 Well managed parks and public gardens;
 - 7.1.2 More lightly managed areas where public access is encouraged;
 - 7.1.3 Areas to which access is discouraged but occasional access and/or trespassing is possible.
- 7.2 The degree of protection that will need to be afforded to people will be largely dependent upon how the access to these areas is encouraged/discouraged and managed. For guidance only, access may be discouraged by physical barriers such as fencing, or vegetation, or actively managed by the provision of walkways along which controlled access is encouraged. The topography of the site may encourage children to use bikes, potentially causing rutting of the ground surface and exposing soils at depth. Detailed designs in this regard will be prepared by the Developer approved by CDL and agreed with the Environmental Authorities to (i) protect human health considering the reasonably anticipatable use of the land (ii) achieve the relevant RBSLs (recreational RBSLs being provided in Table 1 above) to an appropriate depth and (iii) include an appropriate scheme of validation testing.

8. **Validation**

- 8.1 As a minimum validation of RBSL’s will be required to include:
 - 8.1.1 Determining the necessary extent of remedial excavations: this will be the responsibility of the Developer;

- 8.1.2 Quality assurance of imported materials, including testing of imported materials for contamination if it is intended to use reclaimed aggregates, top soil, etc: this will be the responsibility of the Developer, however, CDL may elect to validate such materials in-situ, once they are finally placed for construction;
- 8.1.3 Quality assurance of soils treated on the site for re-use: this will be the responsibility of the Developer, however, CDL will validate such materials in-situ, once they are finally placed for construction, and;
- 8.1.4 Quality assurance of soils for which no remedial works are identified: this will be the responsibility of the Developer, however, CDL will validate such materials.

8.2 As a minimum, sampling at the following frequencies should be undertaken.

Table 4 - Minimum Validation Testing Frequencies.

Testing for the Validation Suite at the following frequency:	Shallow Soils (Residential <1m FFL)	Deeper Soils (Residential >1m below FFL)	Soils (Commercial all relevant depths)
Imported quarried material	1 per 500m ³ ex situ, composite of 5 regular sub-samples	1 per 1000m ³ ex situ, composite of 5 regular sub-samples	1 per 1000m ³ ex situ, composite of 5 regular sub-samples
Imported soil from verified greenfield site	1 per 250m ³ ex situ, composite of 5 regular sub-samples	1 per 500m ³ ex situ, composite of 5 regular sub-samples	1 per 500m ³ ex situ, composite of 5 regular sub-samples
Imported soil from characterised brownfield site ¹	1 per 25m ³ ex situ, composite of 5 sub-samples	1 per 50m ³ ex situ, composite of 5 sub-samples	1 per 100m ³ ex situ, composite of 5 sub-samples
0.5-1m below FFL in-situ	Regular grid of 1 per 50m ² , sample over 0.5m depth	n/a	Regular grid of 1 per 400m ² , sample over 0.5m depth
>1m below FFL in-situ	n/a	Regular grid of 1 per 100m ² , sample over 1m depth	Regular grid of 1 per 400m ² , sample over 0.5m depth
Stockpiled excavated site materials for re-use	1 per 50m ³ ex situ, composite of 5 sub-samples	1 per 100m ³ ex situ, composite of 5 sub-samples	1 per 400m ³ ex situ, composite of 5 sub-samples
Face of remedial excavations <1m deep	1 per 10m, minimum of 1 per face, worst case VO sample	n/a	1 per 15m, minimum of 1 per face, worst case VO sample
Face of remedial excavations >1m deep	n/a	1 per 10m ² , minimum of 1 per face, worst case VO sample	1 per 15m ² , minimum of 1 per face, worst case VO sample
Along redundant service excavations	1 per 20m of trench, worst case VO sample	1 per 20m of trench, worst case VO sample	1 per 20m of trench, worst case VO sample
Soil treated ex-situ and homogenised	1 per 200m ³ , composite of 5 regular sub-samples	1 per 200m ³ , composite of 5 regular sub-samples	1 per 500m ³ , composite of 5 regular sub-samples

¹ Validation suite to reflect prior use of the originating brownfield site and the design and purpose of the relevant area of Coed Darcy.

VO = visual / olfactory (ie aesthetic) observation

- 8.3 The quality of all material placed as fill and/or remaining in-situ post-construction of the Urban Village must as a minimum meet the relevant RBSLs and aesthetic standards at the frequencies set out above (in either case as the same may be amended in accordance with this Schedule).
- 8.4 In all circumstances, CDL and/or the Monitor may at its discretion take additional samples if it has reason to suspect that material may not meet the relevant RBSLs and

aesthetic standards (in either case as the same may be amended in accordance with this Schedule).

- 8.5 All validation samples obtained by CDL and/or the Monitor whether according to the above frequencies or on a discretionary basis must on analysis be of the same or better quality than the relevant RBSLs and meet or exceed the relevant aesthetic criteria (in either case as the same may be amended in accordance with this Schedule).

APPENDIX C INFORMATION SOURCES

APPENDIX D REQUESTS FOR INFORMATION (RFI)

Contract Name:	Coed Darcy Monitor	RFI No:
Contract Number:	GNP/NJR/13773-2	Date Raised: 6 May 2015
Subject:	Review of Atkins' Validation Report for Monitor Phase 53	
To:	Michelle Lee	Atkins
Cc:	Mike Poland	Atkins
From:	Rhys Mander	AECOM

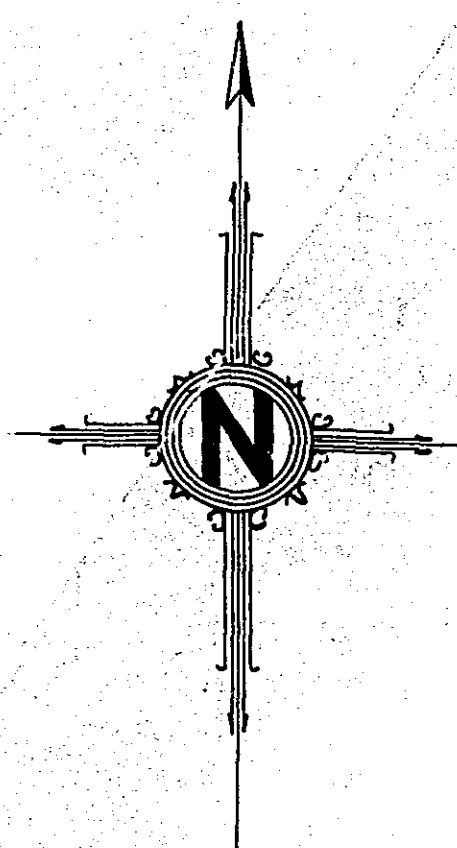
Comments

The following queries are raised in relation to Atkins' Validation Report for Monitor Phase 53 (report ref. 5041216/REM/RPT/0001332) and Atkins' subsequent Technical Note ref. 5041216-OSW-TN-0001350:

- Glossary of Terms – The abbreviation for Risk Based Screening Level is listed as 'RSBL' rather than 'RBSL'.
- Section 4.1 makes reference to 145 trial pits and Section 4.3.1 refers to 136 trial pits. Please explain this discrepancy. It is noted that approximately 135 trial pit locations are shown on drawing 5041216-REM-DWG-1780 and 136 trial pit logs are presented in Appendix B, however 24 logs are missing, there are additional logs from 47 trial pits and duplicates of two of the logs.
- It is noted on drawing 5041216-REM-DWG-1780 that a number of trial pits are shown to have been excavated in and around the bowling green. Please confirm whether or not these pits were excavated?
- Section 4.2 states that water strikes were recorded in 15 trial pits, however only 10 of the trial pit logs presented in Appendix B make reference to water strikes. It is also noted that three of these trial pits (NSE44, NSE75 and NSE78) are not located within Phase 53.
- Section 4.3 makes reference to 311 soil samples and Section 6.2.1 refers to 306 soil samples. Please explain this discrepancy. It is also noted that no lab certificates have been provided. Furthermore, lab data is missing from 27 locations, there is additional lab data from 17 locations and duplicates of data from 5 locations.
- Section 4.3.1 states that Chrysotile asbestos was identified in one location, trial pit NSE115 at 0.5m. This does not appear to have been discussed in the report. Whilst it is noted that the sample underwent quantitative analysis and a result of <0.001% was reported, please confirm that no visible ACM was present. Please note the requirement specified in the Section 106 Agreement that all soils potentially containing visible ACM must be removed or remediated.
- Section 6.3 states that asbestos was identified in one sample but that quantitative analysis indicated concentrations below the laboratory method detection limit. It is noted however that Chrysotile was identified in 4 samples (NSE035 at 0.50m, NSE036 at 0.50m, NSE068 at 0.50m and NSE085 at 0.50m) and crocidolite was identified in 1 sample (NSE035 at 0.50m). Loose chrysotile fibres were also noted in NSE115 at 0.5m. Further discussion is required given the Section 106 Agreement that all soils potentially containing visible ACM must be removed or remediated.
- Section 5.2 states that trial pits surrounding NSE52 were excavated to bedrock with no visual or olfactory evidence of contamination recorded in soil or on bedrock. Should this read NSE53? Do these additional trial pits have reference numbers and logs and are they shown on drawing 5041216-REM-DWG-1777?
- Similarly, section 6.2.2 states that an additional trial pit was excavated within the vicinity of NSE31. Does this trial pit have a reference number and log and is it shown on drawing 5041216-REM-DWG-1777?
- Section 6.1 discusses the testing frequency and states that a reduced frequency of 1 per 400m² was agreed with the Monitor. However our record of the discussions suggested that a frequency of 1 per 200m² had been provisionally agreed subject to the assessment of the soils being acceptable. It is noted that a testing frequency of 1 per 284m² is reported to have been achieved. Nevertheless, notwithstanding the above comments, given that the results from the trial pits appear to be generally acceptable, and given the lack of historical uses, the Monitor may be willing to accept that no further investigation is required.
- Section 6.3 – Reference to Table 6.3 should read Table 6.2.

Date: 6 May 2015

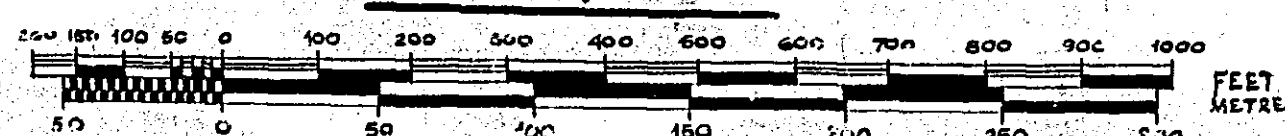
APPENDIX E HISTORICAL MAPS



ISSUE 1
 DELETED - MEROX UNIT; POWER STN. N° 2; SUMP SEPARATORS A & B;
 COOLING TOWERS A, B & C; LUB. OIL BLENDING DESPATCH PLANT;
 BOTTLED GAS DESPATCH PLANT;
 TANKS 105, 106, 107, 110, 111, 113, 114, 115; 227 TO 233 INC.;
 301 TO 318 INC.; 400 TO 412 INC. 415 TO 430 INC. 433, 434, 437, 438.
 102, 108, 109, 200, 210.
 ADDED - WILLES GAS STATION; VDU PREHEAT & COOLING TOWER;
 WHITE OIL SLACK WALK ROAD LOADING GANTREY; WHITE OIL & LPG
 RAIL LOADING GANTRIES; TANK D.M.1; TANKS D3, D4, D6, D7, D10,
 E9, F10; LORRY PARK.

1/2500		JAN		UPDATED AS ABOVE.			
ISS.	DATE	DR.		CHK.	APP.		
BP. REFINERY (LLANDARCY) LTD.				JOB No.	DR.	CH.	APP.
				TR.	APP.	CH.	APP.
UNIT: ESTATES							
SECTION: PLOT, PLANS & LAYOUTS.							
DESCRIPTION: LAYOUT OF REFINERY & TANK FARM.							
				X02-01-48			
SCALE 1/2500				DRAWING NUMBER	02-01-48		DRAWER NUMBER

SCALE 1/2500

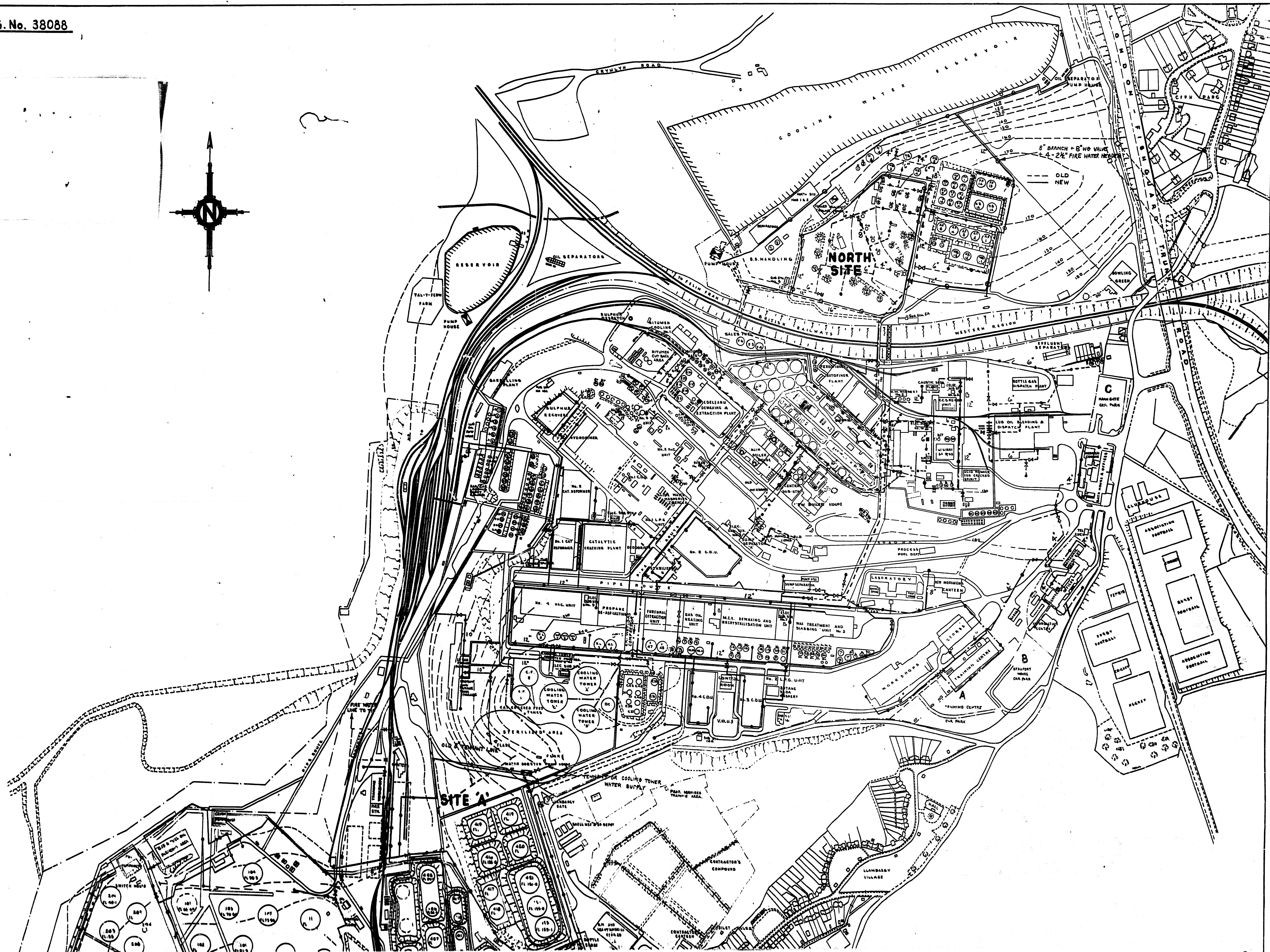


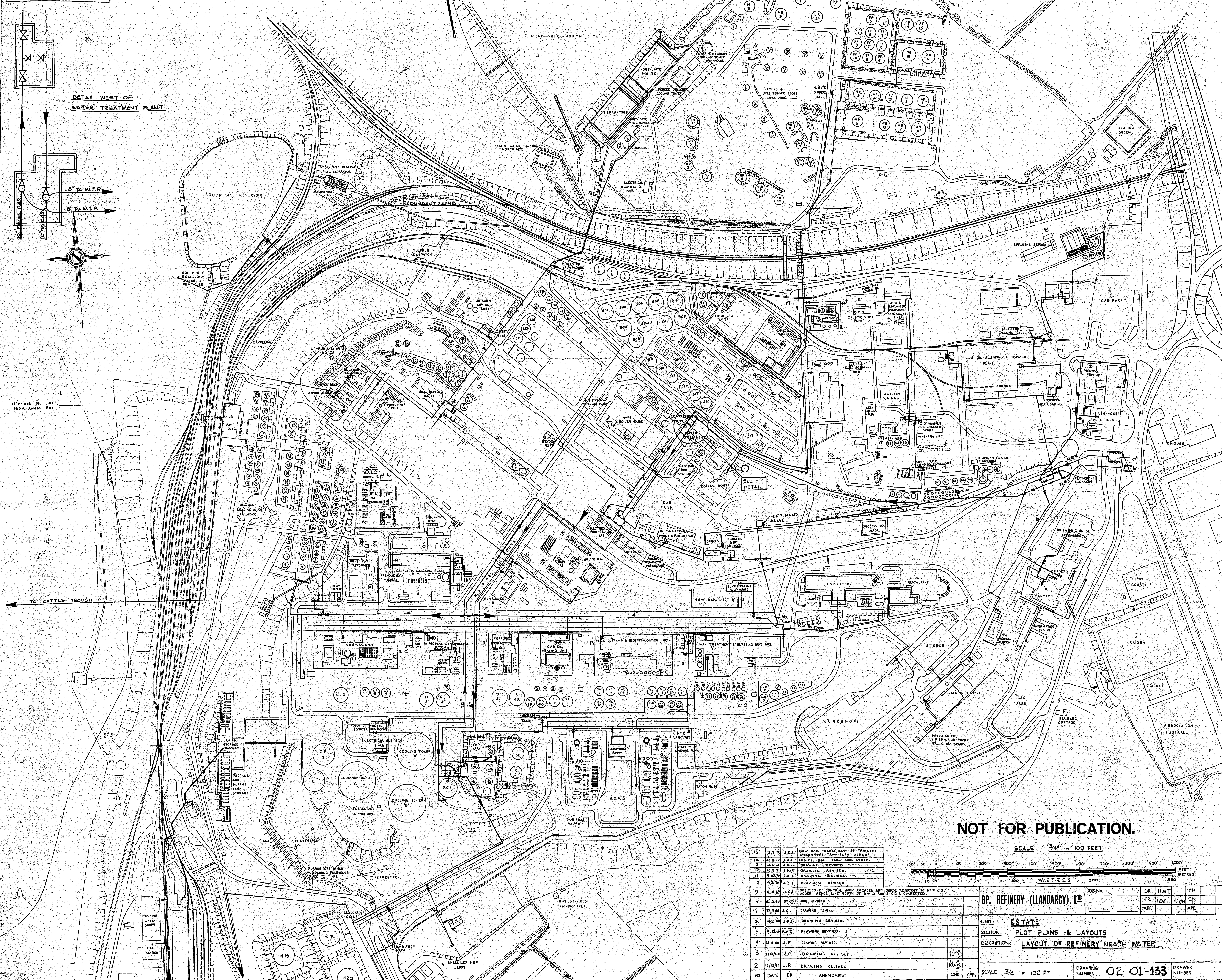
GATE	KEY NO	RING NO	LOCATION	GATE	KEY NO	RING NO	LOCATION
1	194	1F	MAIN GATE	13	425	9F	OLD SUNBURY COMPOUND
2	208/588	2F	WEST GATE	14	335/638	10F	T.V.O. COMPOUND (B SITE GATE)
3	572	3F	EAST WALL GATE	15	1225/A122	11F	C. SITE GATE
4/5/6	A1660/529/503	4F	TRAINING CENTRE GATES	16	450/1067	12F	D. SITE GATE / PIPE TRACK / ELBA
7/8	A1397/A2544	5F	OLD PROTECT GATES	17	593	13F	FREEMANS BUND (EMERGENCY)
9	483/A2469	6F	TANK FARM GATES	18/19/20	1914	14F	RUBBISH TIP BOUNDARY GATES
10	594	7F	EMERGENCY GATE NEAR DM. STORES	21/22/23	451/2331/468	15F	RAIL HEAD GATES
11/12	568/3/A2448/A2406	8F	D.M. STORES AND COMPOUND	24	207	16F	WICKET GATE TO RAILHEAD

DRG. N° 34811.



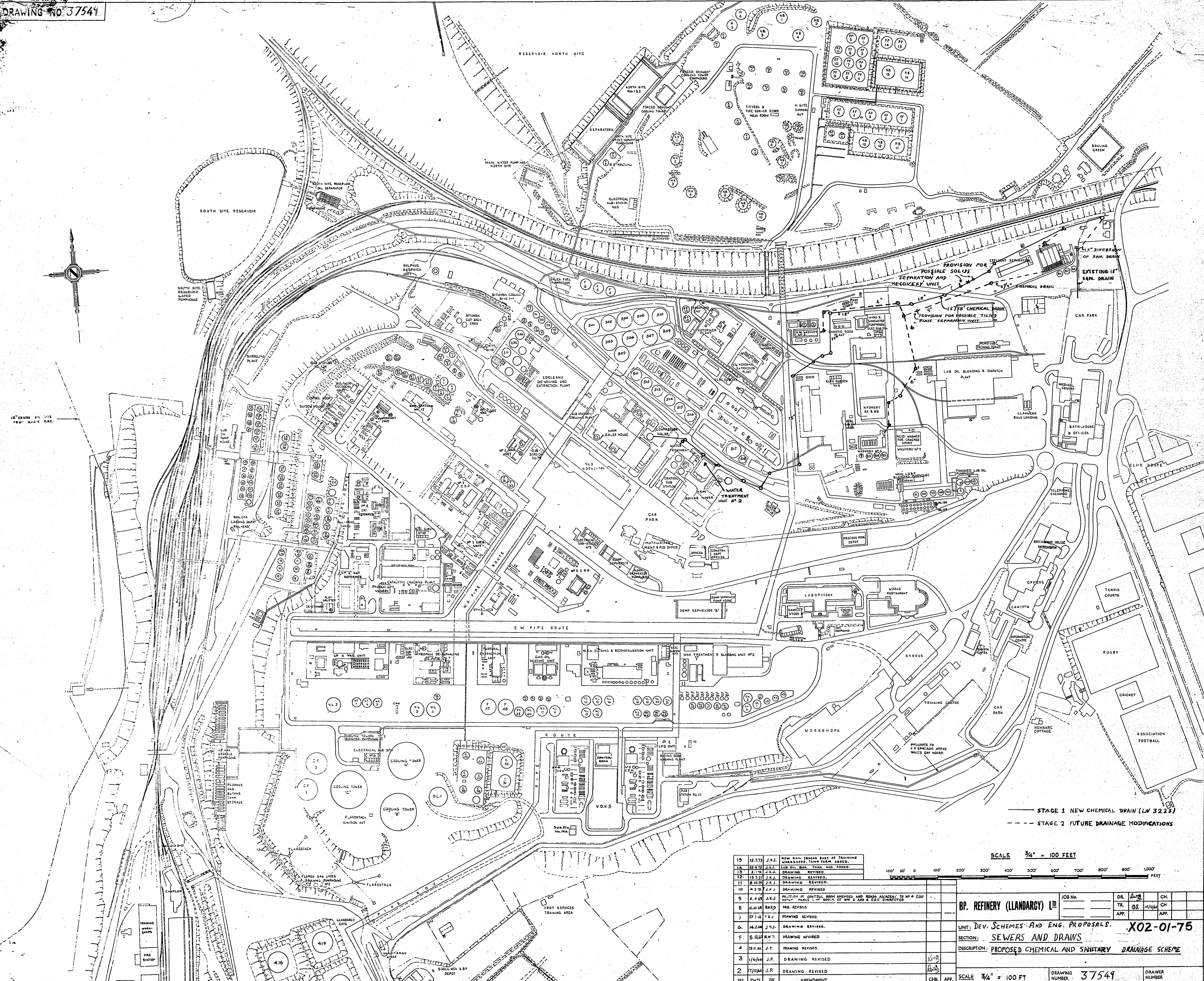
GATE	KEY NO	RING NO	LOCATION	GATE	KEY NO	RING NO	LOCATION
25/26	A1821/596/421	17F	TANK FARM GATE, GATE OFF CRYMMLYN	38/39/40	112/A367/A2266	24F	TENNENT CANAL PUMPHOUSE
27-28-29-30-32	A2310/602/595 A2306/609/407	18F	NORTH SITE RESERVOIR GATES	41-48	168/531	25F	A.F.R.D.
33	A1470	19F	EMERGENCY GATE TO NORTH SITE (FROM FIELD)	49/50	599/604	26F	FREEMANS BUND
34	494	20F	NORTH SITE GATE NR BOWLING GREEN	52/53	A1428/A1458	28F	COURTYARD GATES, REAR MED CENTRE
35	603	21F	WICKET GATE TO RAIL EMBANKMENT				
36	246	22F	OLD PROTECT GATE (BADGERS)				
37	1093	23F	EMERGENCY GATES, MEDICAL CENTRE				





NOT FOR PUBLICATION.

15 3.7.71 J.K.J. NEW RAIL TRACKS EAST OF TRAINING WORKSHOPS, TANK PARK, ADDED.			SCALE ¾" = 100 FEET																										
14 22.9.72 J.K.J. LUB OIL BLDG. TANKS, NOS. ADDED.			13 3.6.72 J.K.J. DRAWING REVISED.			12 12.7.71 J.K.J. DRAWING REVISED.			11 8.10.70 J.K.J. DRAWING REVISED.			10 24.3.70 J.K.J. DRAWING REVISED.																	
9 4.4.69 J.K.J. POSITION OF CENTRAL ROAD APPROVED AND ROAD ADJACENT TO NO. 4 COR. ADDED FENCE LINE SOUTH OF NO. 3 AND A.C.B. CORRECTED.			8 10.10.68 J.K.J. DRC REVISED.			7 21.7.68 J.K.J. DRAWING REVISED.			6 14.2.64 J.K.J. DRAWING REVISED.			5 8.12.63 R.W.D. DRAWING REVISED.			4 23.11.61 J.P. DRAWING REVISED.			3 1/6/64 J.P. DRAWING REVISED.			2 7/12/61 J.P. DRAWING REVISED.			15 DATE DR AMENDMENT			CHK. APP.		
BP. REFINERY (LLANDARCY) LTD															JOB NO.			DR. H.M.T.		CH.									
																		TR. OS 4/72/64		CH.									
																		APP.		APP.									
UNIT: ESTATE																													
SECTION: PLOT PLANS & LAYOUTS																													
DESCRIPTION: LAYOUT OF REFINERY NEATH WATER																													
SCALE ¾" = 100 FT															DRAWING NUMBER			02-01-133			DRAWER NUMBER								

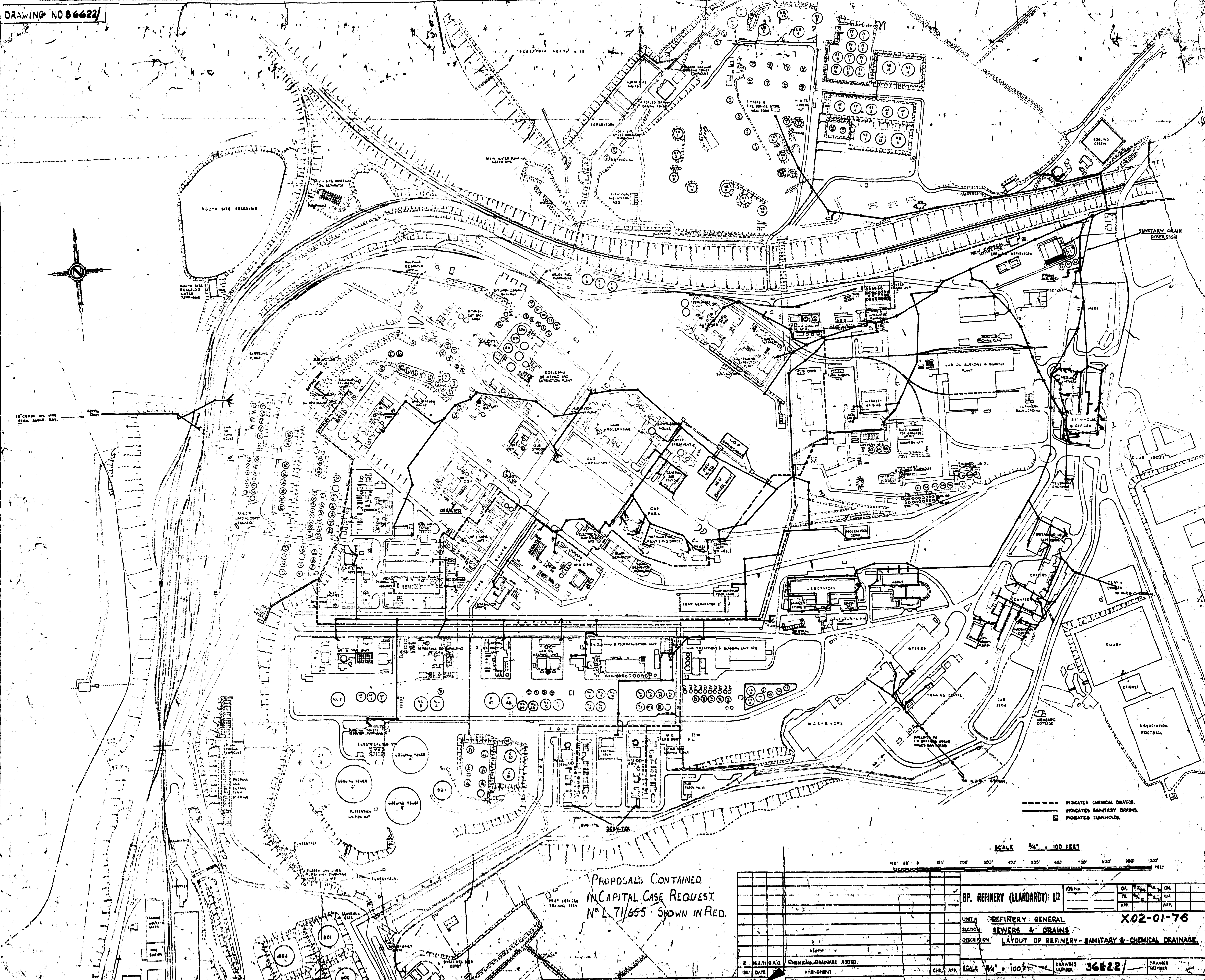


STAGE 1 NEW CHEMICAL DRAIN (LN 3223)
STAGE 2 FUTURE DRAINAGE MODIFICATIONS

SCALE 3/4" = 100 FEET

15	12.7.73	J.K.J.	NEW RAIL TRACKS EAST OF TRAINING WORKSHOPS, TANK FARM, ADDED.
14	22.9.72	J.K.J.	LUB OIL BKG. TANK HAS ADDED.
13	3.1.72	J.K.J.	DRAWING REVISED.
12	10.3.71	J.K.J.	DRAWING REVISED.
11	8.10.70	J.K.J.	DRAWING REVISED.
10	4.3.70	J.K.J.	DRAWING REVISED.
9	4.4.69	J.K.J.	POSITION OF CONTROL ROOM AMENDED, AND ROADS ADJACENT TO NO 4 CDU ADDED. FENCE L. OF ROAD OF NO 3 AND 4 CDUs CHANGED.
8	6.10.68	R.M.D.	DWG. REVISED.
7	27.1.68	J.K.J.	DRAWING REVISED.
6	16.2.66	J.K.J.	DRAWING REVISED.
5	5.12.65	R.M.D.	DRAWING REVISED.
4	23.8.64	J.P.	DRAWING REVISED.
3	1/6/64	J.P.	DRAWING REVISED.
2	7/12/64	J.P.	DRAWING REVISED.
155	DATE	DR.	AMENDMENT

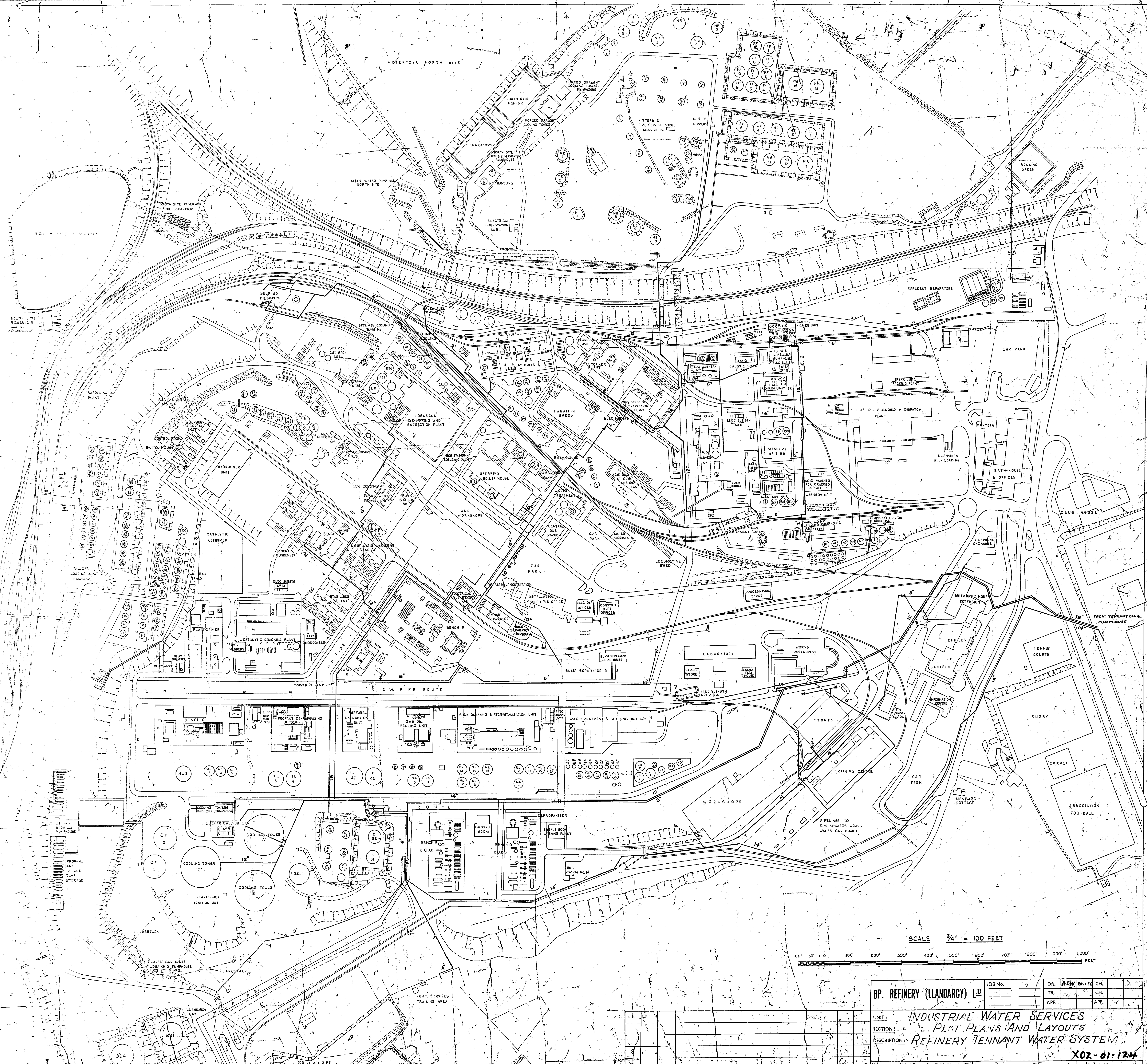
BP. REFINERY (LLANDARCY) LTD		JOB No.	DR.	CH.
UNIT: DEV. SCHEMES AND ENG. PROPOSALS.		TR.	OS.	CH.
SECTION: SEWERS AND DRAINS		APP.	APP.	
DESCRIPTION: PROPOSED CHEMICAL AND SANITARY DRAINAGE SCHEME		X02-01-75		
SCALE 3/4" = 100 FT	DRAWING NUMBER 37549	DRAWER NUMBER		



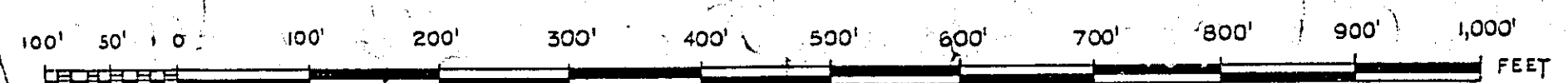
PROPOSALS CONTAINED
IN CAPITAL CASE REQUEST
Nº L 71/655 SHOWN IN RED.

BP. REFINERY (LLANDARCY) LTD		JOB No	DR	TR	APP	CH	CH	CH
UNIT: REFINERY GENERAL								
SECTION: SEWERS & DRAINS								
DESCRIPTION: LAYOUT OF REFINERY - SANITARY & CHEMICAL DRAINAGE.								
2 16.7.71 G.A.C. CHEMICAL DRAINAGE ADDED.								
15/ DATE								
AMENDMENT								
CHK. APP.								
SCALE 1/4" = 100 FT.								
DRAWING NUMBER 36622/								
DRAWER NUMBER								

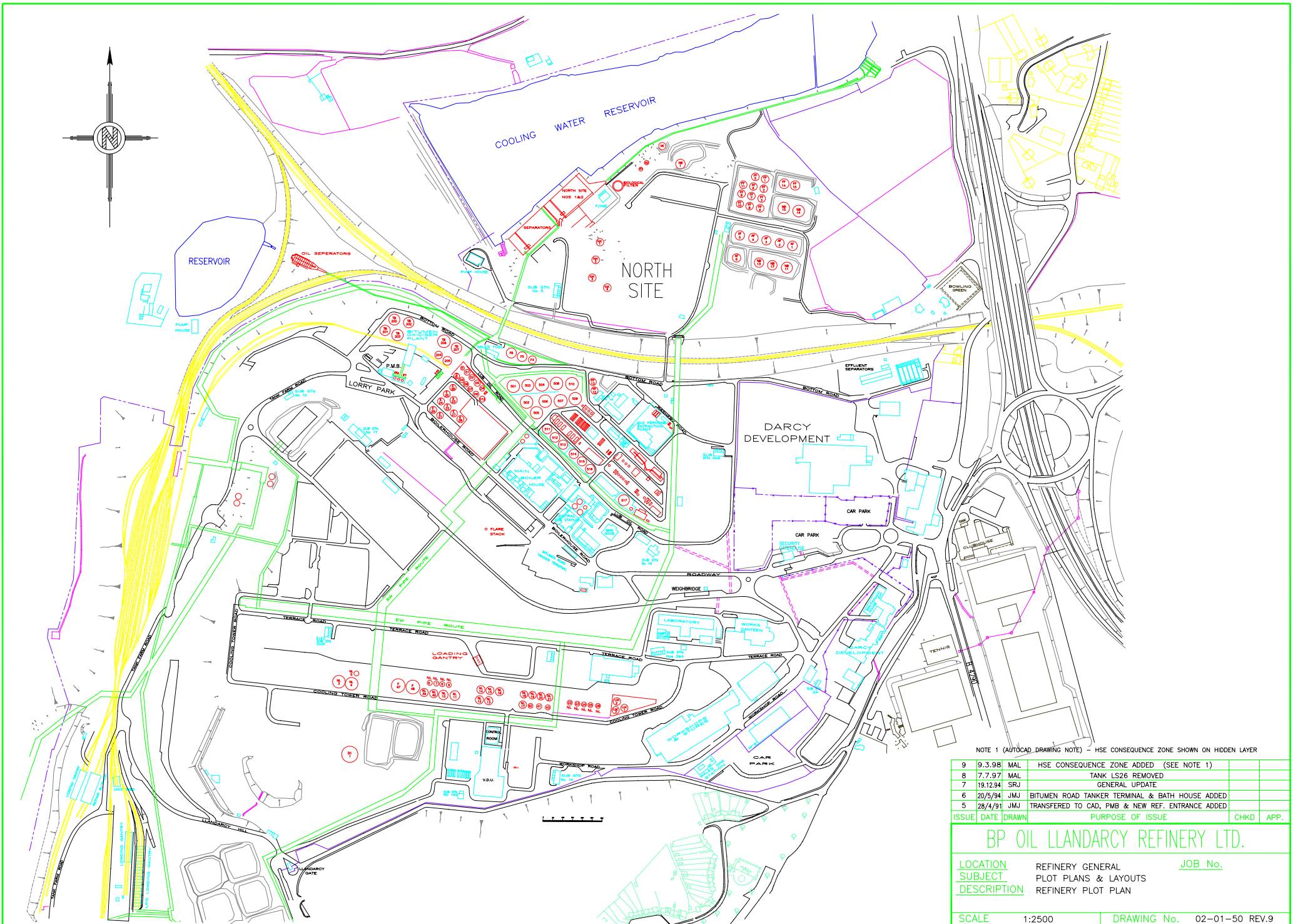
X.02-01-76



SCALE 3/4" = 100 FEET



BP. REFINERY (LLANDRUGY) LTD		JOB No.	DR. AEW	CH.
		TR.		
		APP.		
UNIT: INDUSTRIAL WATER SERVICES				
SECTION: PLANT PLANS AND LAYOUTS				
DESCRIPTION: REFINERY TENNANT WATER SYSTEM				
		X02-01-124		
IS.	DATE	DR.	APP.	SCALE 3/4" = 100 FT
				DRAWING NUMBER 35027
				DRAWER NUMBER



NOTE 1 (AUTOCAD DRAWING NOTE) - HSE CONSEQUENCE ZONE SHOWN ON HIDDEN LAYER

9	9.3.98	MAL	HSE CONSEQUENCE ZONE ADDED (SEE NOTE 1)		
8	7.7.97	MAL	TANK LS26 REMOVED		
7	19.12.94	SRJ	GENERAL UPDATE		
6	20/5/94	JMJ	BITUMEN ROAD TANKER TERMINAL & BATH HOUSE ADDED		
5	28/4/91	JMJ	TRANSFERRED TO CAD, PMB & NEW REF. ENTRANCE ADDED		
ISSUE	DATE	DRAWN	PURPOSE OF ISSUE	CHKD	APP.

BP OIL LLANDARCY REFINERY LTD.

LOCATION	REFINERY GENERAL	JOB No.
SUBJECT	PLOT PLANS & LAYOUTS	
DESCRIPTION	REFINERY PLOT PLAN	
SCALE	1:2500	DRAWING No. 02-01-50 REV.9

***APPENDIX F TOPOGRAPHICAL
RECORD OF THE GROUND
LEVELS FOLLOWING THE
COMPLETION OF THE
REDEVELOPMENT
REMEDIATION WORKS***

APPENDIX G COMPARISON OF RBSL AND RTC THRESHOLDS

4. Comparison of RBSLs and RTC

As an objective of these works was to establish whether the RBSLs were health protective, the RBSLs and RTC have been compared. This comparison is presented in the tables in this section of the report. Within the tables within this section, the lower of the RBSL/RTC has been bolded. Therefore where the RBSL has been bolded, it is protective in comparison to the RTC:

- If the RBSL and the RTC are equal, the RBSL is bolded.
- If the RTC is lower than the RBSL, the RTC is bolded ¹⁶.
- If the RBSL is lower than the RTC, the RBSL is bolded.

Where the RTC are greater than the RBSL or the RTC are equal to the RBSL, the values have been marked as final to illustrate that the RBSL is protective. Where the RTC are lower than the RBSL, further site specific modifications could be considered to establish whether the RTC is unnecessarily conservative and these have been marked as draft.

The RBSL should be used in all cases, except where the RTC is bolded. In this event, the relevant RTC should therefore be adopted.

These further site specific modifications have not been considered at the present stage. However, information provided herein could be used to inform such an evaluation.

4.1 Comparison of residential RBSLs and RTC (shallow soil)

The residential RBSLs and RTC for a shallow soil source are compared in Table 4.1 below.

Table 4.1 – Comparison of residential RBSLs and RTC for shallow soil

Contaminant	S106 RBSL (mg/kg)	RTC 1% Sand (mg/kg)	RTC 3% Sandy loam (mg/kg)	Draft/Final
Arsenic	6.40E+01	6.40E+01 a	6.40E+01 a	final
Chromium	1.30E+02	7.80E+01 a	7.80E+01 a	draft
Cadmium	2.60E+00	3.00E+00 b	3.00E+00 b	final
Mercury (inorganic)	1.00E+00	1.00E+00 b	1.00E+00 b	final
Nickel	5.00E+01	7.50E+01 b	7.50E+01 b	final
Selenium	3.00E+00	3.00E+00 b	3.00E+00 b	final
Lead	3.37E+02	3.37E+02 a	3.37E+02 a	final
Vanadium	4.16E+02	1.13E+02	1.15E+02	draft
Copper	4.78E+02	1.43E+02 a	1.43E+02 a	draft
Zinc	2.00E+02	4.78E+02 a	4.78E+02 a	final
Benzo(a)pyrene	9.00E-01	2.11E+00	2.42E+00	final
Benzene	1.20E-01	4.93E-02	1.92E-01	draft
Toluene	3.60E+01	8.69E+01	3.29E+02	final
Ethylbenzene	4.10E+01	3.82E+01	1.93E+02	draft
Xylene	3.20E+01	1.72E+01	1.31E+02	draft

¹⁶ In some cases there may be two RTC, where one RTC is higher and the other lower: one may be bolded and the other not and therefore they remain as draft.

Contaminant	S106 RBSL (mg/kg)	RTC 1% Sand (mg/kg)	RTC 3% Sandy loam (mg/kg)	Draft/Final
TPH aromatic C7-C8	1.25E+02	8.69E+01	3.29E+02	draft
TPH aromatic C8-C10	9.40E+01	1.48E+01	1.03E+02	draft
TPH aromatic C10-C12	1.18E+02	5.73E+01	2.21E+02	draft
TPH aromatic C12-C16	1.31E+02	1.42E+02	4.14E+02	final
TPH aliphatic C6-C8	8.34E+03	6.98E+01	1.69E+04 *	draft
TPH aliphatic C8-C10	1.12E+02	9.76E+00	8.71E+01	draft
TPH aliphatic C10-C12	3.20E+03	1.78E+03 *	4.18E+03 *	draft
TPH aliphatic C12-C16	4.51E+03	5.10E+03 *	5.31E+03 *	final
TPH aromatic C16-C21	8.20E+01	2.72E+02	5.77E+02	final
TPH aromatic C21-C35	1.13E+03	8.88E+02	1.14E+03	draft
TPH aliphatic C16-C21	9.42E+04	1.45E+05	1.45E+05	final
TPH aliphatic C21-C35	9.48E+04			final
Total TPH (Phase 1)	1.72E+03	none (see note 9)		
Total TPH (Process Area)	2.60E+03			
Total TPH (North Tank Farm)	1.10E+03			
Total TPH (South Tank Farm)	1.02E+03			
1,2-Dichloroethane	4.00E-02	1.90E-03	1.02E-02	draft
1,1,1-Trichloroethane	1.54E+02	2.23E+00	1.73E+01	draft
Tetrachloroethene	1.10E+01	4.55E-01	3.62E+00	draft
Trichloroethene	1.00E+00	3.82E-02	3.04E-01	draft
Vinyl chloride	1.00E-02	2.02E-04	8.20E-04	draft
Dichloromethane	5.00E+00	4.58E-01	1.56E+00	draft
Cis-1,2-Dichloroethene	4.00E+00	3.93E-02	2.55E-01	draft
Trans-1,2 Dichloroethene		6.71E-02	4.64E-01	draft
Notes				
1. It is assumed that no visible free product is present within the top 1.0m of soil				
2. Metal RTC derived considering Soil Codes and background data a – based on background soil concentration b – based on Soil Code				
3. Xylene - the lowest RTC of the three isomers has been presented. Users must consider total exposure from all xylene isomers and not consider them in isolation				
4. TPH aromatic C7-C8 is considered to comprise toluene only by Atkins				
* 5. The RTC for TPH aliphatic C10-C12 and TPH aliphatic C12-C16 for 1% sand and TPH aliphatic C6-C8, TPH aliphatic C10-C12 and TPH aliphatic C12-C16 for 3% sandy loam are based on a value produced from following the approach outlined in SR4 for substances at saturation				
6. In the S106 (Ref. 1), only one value was presented for 1,2-dichloroethene of 4 mg/kg				
7. 'Total' TPH RBSL derived for an area of development, based on individual RBSL and available mass fraction TPH data in soil at time of derivation, using the inverse weighted average approach.				

Contaminant	S106 RBSL (mg/kg)	RTC 1% Sand (mg/kg)	RTC 3% Sandy loam (mg/kg)	Draft/Final
8. Benzo(a)pyrene RBSL to be compared against sum of 16 US EPA Priority List PAHs using Toxicity Equivalence approach				
9. No RTC was produced for total TPH as this will be considered further at validation stage				
10. Asbestos has not been considered here as it is being considered in a separate report				
11. Additivity for TPHs and PAHs to be undertaken in line with guidance in this report				

4.2 Comparison of residential RBSLs and RTC (deep soil)

The residential RBSLs and RTC for a deep soil source are compared in Table 4.2 below.

Table 4.2 – Comparison of residential RBSLs and RTC for deep soil (1m FFL)

Contaminant	S106 RBSL (mg/kg)	RTC 1% Sandy loam (mg/kg)	RTC 3% Sandy loam (mg/kg)	Draft/final
Benzo(a)pyrene	none	>sat	>sat	final
Benzene	4.00E-01	4.60E-01	9.87E-01	final
Toluene	5.20E+01	>sat	>sat	final
Ethylbenzene	1.40E+02	2.90E+02	8.12E+02	final
Xylene	5.80E+01	9.14E+01	2.56E+02	final
TPH aromatic C7-C8	1.46E+02	>sat	>sat	final
TPH aromatic C8-C10	2.57E+02	7.10E+01	2.09E+02	draft
TPH aromatic C10-C12	1.39E+03	>sat	>sat	final
TPH aromatic C12-C16	none	>sat	>sat	final
TPH aliphatic C6-C8	none	>sat	>sat	final
TPH aliphatic C8-C10	1.58E+02	4.25E+01	1.25E+02	draft
TPH aliphatic C10-C12	none	>sat	>sat	final
TPH aliphatic C12-C16	none	>sat	>sat	final
TPH aliphatic C16-C21	none	none (see note 3)		
TPH aliphatic C21-C35	none			
TPH aromatic C16-C21	none			
TPH aromatic C21-C35	none			
Total TPH (Phase 1)	9.18E+03	none (see note 9)		
Total TPH (Process Area)	4.10E+03			
Total TPH (North Tank Farm)	3.80E+03			
Total TPH (South Tank Farm)	2.79E+03			
1,2-Dichloroethane	1.00E-01	1.11E-02	1.76E-02	draft
1,1,1-Trichloroethane	1.60E+02	1.08E+01	2.59E+01	draft
Tetrachloroethene	3.40E+01	2.30E+00	6.12E+00	draft
Trichloroethene	2.00E+00	1.88E-01	4.63E-01	draft

Contaminant	S106 RBSL (mg/kg)	RTC 1% Sandy loam (mg/kg)	RTC 3% Sandy loam (mg/kg)	Draft/final
Vinyl chloride	4.00E-02	9.30E-04	1.29E-03	draft
Dichloromethane	8.40E+01	4.19E+00	6.04E+00	draft
Cis-1,2-Dichloroethene	7.00E+00	2.06E-01	3.92E-01	draft
Trans-1,2 Dichloroethene		3.32E-01	6.89E-01	draft
Notes				
1. Where the lower of the vapour or aqueous saturation limits have been exceeded by the RTC calculated, the hazard quotient is considered to be less than 1 and as such >sat has been presented				
2. Xylene - the lowest RTC of the three isomers has been presented. Users must consider total exposure from all xylene isomers and not consider them in isolation				
3. TPH >C16 are not considered to be volatile according to TPHCWG. Consequently the inhalation of vapour pathways have not been considered and therefore no RTC value has been presented here				
4. “none” indicates theoretical RBSL greater than solubility limit				
5. In the S106 (Ref. 1), only one value was presented for 1,2-dichloroethene of 7 mg/kg				
6. ‘Total’ TPH RBSL derived for an area of development, based on individual RBSL and available mass fraction TPH data in soil at time of derivation, using the inverse weighted average approach.				
7. Benzo(a)pyrene RBSL to be compared against sum of 16 US EPA Priority List PAHs using Toxicity Equivalence approach				
8. TPH aromatic C7-C8 is considered to comprise toluene only by Atkins				
9. No RTC was produced for total TPH as this will be considered further at validation stage				
10. Asbestos has not been considered here as it is being considered in a separate report				
11. Additivity for TPHs and PAHs to be undertaken in line with guidance in this report				

4.3 Comparison of residential RBSLs and RTC (groundwater)

The residential RBSLs and RTC for a groundwater source are compared in Table 4.3 below.

Table 4.3 – Comparison of residential RBSLs and RTC for groundwater (1m FFL)

Contaminant	S106 RBSL (mg/l)	RTC (mg/l)	Draft/Final
Benzo(a)pyrene	none	>sat	final
Benzene	7.00E-01	8.88E-02	draft
Toluene	4.70E+01	9.64E+01	final
Ethylbenzene	1.02E+02	1.34E+01	draft
Xylene	4.30E+01	4.10E+00	draft
TPH aromatic C7-C8	2.00E+01	9.64E+01	final
TPH aromatic C8-C10	2.20E+01	9.85E-01	draft
TPH aromatic C10-C12	none	3.87E+00	draft
TPH aromatic C12-C16	none	>sat	final
TPH aromatic C16-C21	none	none (see note 6)	final
TPH aromatic C21-C35	none		final
TPH aliphatic C6-C8	none	1.40E+00	draft

Contaminant	S106 RBSL (mg/l)	RTC (mg/l)	Draft/Final
TPH aliphatic C8-C10	none	2.96E-02	draft
TPH aliphatic C10-C12	none	2.28E-02	draft
TPH aliphatic C12-C16	none	>sat	final
TPH aliphatic C16-C21	none	none (see note 6)	final
TPH aliphatic C21-C35	none		final
1,2-Dichloroethane	2.00E-01	3.73E-02	draft
1,1,1-Trichloroethane	1.93E+02	1.31E+01	draft
Tetrachloroethene	2.20E+01	1.66E+00	draft
Trichloroethene	2.60E+00	2.22E-01	draft
Vinyl chloride	6.00E-02	2.48E-03	draft
Dichloromethane	1.50E+02	1.30E+01	draft
Cis-1,2 Dichloroethene	1.50E+01	5.47E-01	draft
Trans-1,2 Dichloroethene	1.50E+01	6.75E-01	draft
Notes			
1. Xylene - the lowest RTC of the three isomers has been presented. Users must consider total exposure from all xylene isomers and not consider them in isolation			
2. TPH aromatic C7-C8 is considered to comprise toluene only by Atkins			
3. "none" indicates theoretical RBSL greater than solubility limit			
4. In the S106 (Ref. 1), only one value was presented for 1,2-Dichloroethene of 15 mg/l.			
5. Where indoor and outdoor values were presented by RBCA, these have been integrated in line with SNIFFER (2003). Where both indoor and outdoor values derived by RBCA were greater than the saturation limit, >sat has been presented. Where indoor values were presented by RBCA, and the outdoor values were >sat, only the indoor values have been presented. Therefore >sat indicates that the theoretical RTC is greater than solubility limit.			
6. TPH >C16 are not considered to be volatile according to TPHCWG. Consequently the inhalation of vapour pathways have not been considered			
7. Additivity for TPHs and PAHs to be undertaken in line with guidance in this report			

4.4 Comparison of recreational RBSLs and parks RTC (shallow soil)

The residential RBSLs and RTC for a shallow soil source are compared in Table 4.4 below.

Table 4.4 – Comparison of recreational RBSLs and RTC for shallow soil

Contaminant	S106 RBSL (mg/kg)	RTC 1% Sand (mg/kg)	RTC 3% Sandy loam (mg/kg)	Draft/Final
Arsenic	6.40E+01	6.40E+01 a	6.40E+01 a	final
Chromium	2.00E+02	7.80E+01 a	7.80E+01 a	draft
Cadmium	2.60E+00	3.00E+00 b	3.00E+00 b	final
Mercury (inorganic)	1.00E+00	1.00E+00 b	1.00E+00 b	final
Nickel	7.50E+01	7.50E+01 b	7.50E+01 b	final

Contaminant	S106 RBSL (mg/kg)	RTC 1% Sand (mg/kg)	RTC 3% Sandy loam (mg/kg)	Draft/Final
Selenium	3.00E+00	3.00E+00 b	3.00E+00 b	final
Lead	3.37E+02	3.37E+02 a	3.37E+02 a	final
Vanadium	6.40E+02	3.51E+02	3.51E+02	draft
Copper	4.78E+02	1.43E+02 a	1.43E+02 a	draft
Zinc	2.00E+02	4.78E+02 a	4.78E+02 a	final
Benzo(a)pyrene	9.00E-01	2.14E+00	2.14E+00	final
Benzene	1.30E+01	2.62E+01	2.75E+01	final
Toluene	8.11E+03	2.16E+04 *	2.14E+04 *	final
Ethylbenzene	4.74E+03	9.67E+03 *	9.45E+03 *	final
Xylene	7.94E+03	1.72E+04 *	1.50E+04 *	final
TPH aromatic C7-C8	2.13E+04	2.16E+04	2.14E+04	final
TPH aromatic C8-C10	4.03E+03	2.23E+03	2.31E+03	draft
TPH aromatic C10-C12	4.59E+03	2.30E+03	2.34E+03	draft
TPH aromatic C12-C16	4.80E+03	2.33E+03	2.35E+03	draft
TPH aliphatic C6-C8	6.06E+05	2.94E+05 *	2.94E+05 *	draft
TPH aliphatic C8-C10	1.21E+04	5.88E+03 *	5.74E+03 *	draft
TPH aliphatic C10-C12	1.21E+04	5.70E+03	5.83E+03	draft
TPH aliphatic C12-C16	1.21E+04	5.80E+03	5.86E+03	draft
TPH aromatic C16-C21	3.64E+03	1.45E+03	1.45E+03	draft
TPH aromatic C21-C35	3.64E+03	1.45E+03	1.45E+03	draft
TPH aliphatic C16-C35	2.43E+05	1.59E+05	1.59E+05	draft
TPH aliphatic C21-C35	2.43E+05			draft
Total TPH (Phase 1)	9.06E+03	none (see note 10)		
Total TPH (Process Area)	1.08E+04			
Total TPH (North Tank Farm)	9.42E+03			
Total TPH (South Tank Farm)	6.35E+03			
1,2-Dichloroethane	4.50E+00	9.52E+00	1.07E+01	final
1,1,1-Trichloroethane	2.79E+04	5.80E+04 *	5.80E+04 *	final
Tetrachloroethene	6.41E+02	1.29E+03 *	1.29E+03 *	final
Trichloroethene	1.93E+02	3.79E+02	4.55E+02	final
Vinyl chloride	7.00E-01	1.29E+00	1.33E+00	final
Dichloromethane	2.41E+02	5.07E+02	5.12E+02	final
Cis-1,2-Dichloroethene	6.32E+02	3.92E+02	4.68E+02	draft
Trans-1,2 Dichloroethene	6.32E+02	1.11E+03	1.40E+03	final
Notes				
1. It is assumed that no visible free product is present within the top 1.0m of soil				

Contaminant	S106 RBSL (mg/kg)	RTC 1% Sand (mg/kg)	RTC 3% Sandy loam (mg/kg)	Draft/Final
2. Metal RTC derived considering Soil Codes and background data a – based on background soil concentration b – based on Soil Code				
3. Xylene - the lowest RTC of the three isomers has been presented. Users must consider total exposure from all xylene isomers and not consider them in isolation				
4. TPH aromatic C7-C8 is considered to comprise toluene only by Atkins				
* 5. The RTC for toluene, ethylbenzene, xylene, TPH aliphatic C6-C8, TPH aliphatic C8-C10, 1,1,1-trichloroethane and tetrachloroethene are based on a value produced from following the approach outlined in SR4 for substances at saturation				
6. TPH >C16 are not considered to be volatile according to TPHCWG. Consequently the inhalation of vapour pathways have not been considered				
7. In the S106 (Ref. 1), only one value was presented for 1,2-dichloroethene of 632 mg/kg				
8. 'Total' TPH RBSL derived for an area of development, based on individual RBSL and available mass fraction TPH data in soil at time of derivation, using the inverse weighted average approach.				
9. Benzo(a)pyrene RBSL to be compared against sum of 16 US EPA Priority List PAHs using Toxicity Equivalence approach				
10. No RTC was produced for total TPH as this will be considered further at validation stage				
11. Asbestos has not been considered here as it is being considered in a separate report				
11. Additivity for TPHs and PAHs to be undertaken in line with guidance in this report				

4.5 Comparison of recreational RBSLs and parks RTC (deep soil)

The residential RBSLs and RTC for a deep soil source are compared in Table 4.5 below.

Table 4.5 – Comparison of recreational RBSLs and RTC for deep soil (1m FFL)

Contaminant	S106 RBSL (mg/kg)	RTC 1% Sandy loam (mg/kg)	RTC 3% Sandy loam (mg/kg)	Draft/Final
Benzo(a)pyrene	none	>sat	>sat	final
Benzene	4.80E+01	4.32E+02	9.28E+02	final
Toluene	none	>sat	>sat	final
Ethylbenzene	none	>sat	>sat	final
Xylene	none	4.78E+02	1.33E+03	draft
TPH aromatic C7-C8	none	>sat	>sat	final
TPH aromatic C8-C10	none	>sat	>sat	final
TPH aromatic C10-C12	none	>sat	>sat	final
TPH aromatic C12-C16	none	>sat	>sat	final
TPH aliphatic C6-C8	none	>sat	>sat	final
TPH aliphatic C8-C10	none	>sat	>sat	final
TPH aliphatic C10-C12	none	>sat	>sat	final

Contaminant	S106 RBSL (mg/kg)	RTC 1% Sandy loam (mg/kg)	RTC 3% Sandy loam (mg/kg)	Draft/Final
TPH aliphatic C12-C16	none	>sat	>sat	final
TPH aromatic C16-C21	none	none (see note 4)		
TPH aromatic C21-C35	none			
TPH aliphatic C16-C21	none			
TPH aliphatic C21-C35	none			
Total TPH (Phase 1)	none	none (see note 8)		
Total TPH (Process Area)	none			
Total TPH (North Tank Farm)	none			
Total TPH (South Tank Farm)	none			
1,2-Dichloroethane	6.00E+00	1.04E+02	1.66E+02	final
1,1,1-Trichloroethane	none	>sat	>sat	final
Tetrachloroethene	1.78E+03	>sat	>sat	final
Trichloroethene	2.69E+02	>sat	>sat	final
Vinyl chloride	1.60E+01	8.21E+00	1.14E+01	draft
Dichloromethane	6.22E+03	>sat	>sat	final
Cis-1,2-Dichloroethene	8.81E+02	1.92E+03	3.66E+03	final
Trans-1,2 Dichloroethene		3.10E+03	6.42E+03	final
Notes				
1. Where the lower of the vapour or aqueous saturation limits has been exceeded by the RTC calculated, the hazard quotient is considered to be less than 1 and as such >sat has been presented				
2. Xylene - Users must consider total exposure from all xylene isomers and not consider them in isolation. It should be noted that the value presented is the lowest of the aqueous or vapour saturation limits. The lowest saturation limit of the three isomers has been presented.				
3. TPH aromatic C7-C8 is considered to comprise toluene only by Atkins				
4. TPH >C16 are not considered to be volatile according to TPHCWG. Consequently the inhalation of vapour pathways have not been considered and therefore no value has been presented here				
5. “none” indicates theoretical RBSL greater than solubility limit				
6. ‘Total’ TPH RBSL derived for an area of development, based on individual RBSL and available mass fraction TPH data in soil at time of derivation, using the inverse weighted average approach.				
7. Benzo(a)pyrene RBSL to be compared against sum of 16 US EPA Priority List PAHs using Toxicity Equivalence approach				
8. No RTC was produced for total TPH as this will be considered further at validation stage				
9. Asbestos has not been considered here as it is being considered in a separate report				
10. In the S106, only one value was presented for 1,2-dichloroethene of 881 mg/kg				
11. Additivity for TPHs and PAHs to be undertaken in line with guidance in this report				

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COED DARCY MONITOR PHASE 54 RRWCC

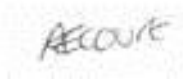
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Scope

This Redevelopment Remediation Works Completion Certificate (RRWCC) has been prepared with reference to the following agreements:

- Section 106 Agreement dated 8 February 2008 between Neath Port Talbot Borough Council (NPTCBC), St Modwen Developments Limited (SMD), St Modwen Properties Plc (SMP), BP Oil Llandarcy Refinery Limited (BPLR) and Coed Darcy Limited (CDL); and
- Remediation and Maintenance Agreement dated 23 May 2008 (RMA) between SMD, SMP and CDL.

Unless advised otherwise, definitions used in this RRWCC can be found in the Section 106 Agreement and/or the RMA.

This RRWCC has been prepared for Phase 54 in response to the receipt of a written request from SMD pursuant to clause 4.3 of the RMA. The phase boundary and intended use on which this RRWCC is based were notified to the Monitor by letter, a copy of which is provided in **Appendi A**.

The intended use for Phase 54 has been declared as commercial. The phase boundary for Phase 54 is the land edged red on drawing 5041216-REM-DWG-1830, a copy of which is provided in **Appendi A**. The approximate location of Phase 54 in relation to the Development Boundary is shown in **Figure** below. Phase 54 covers an area of approximately 13,000m².

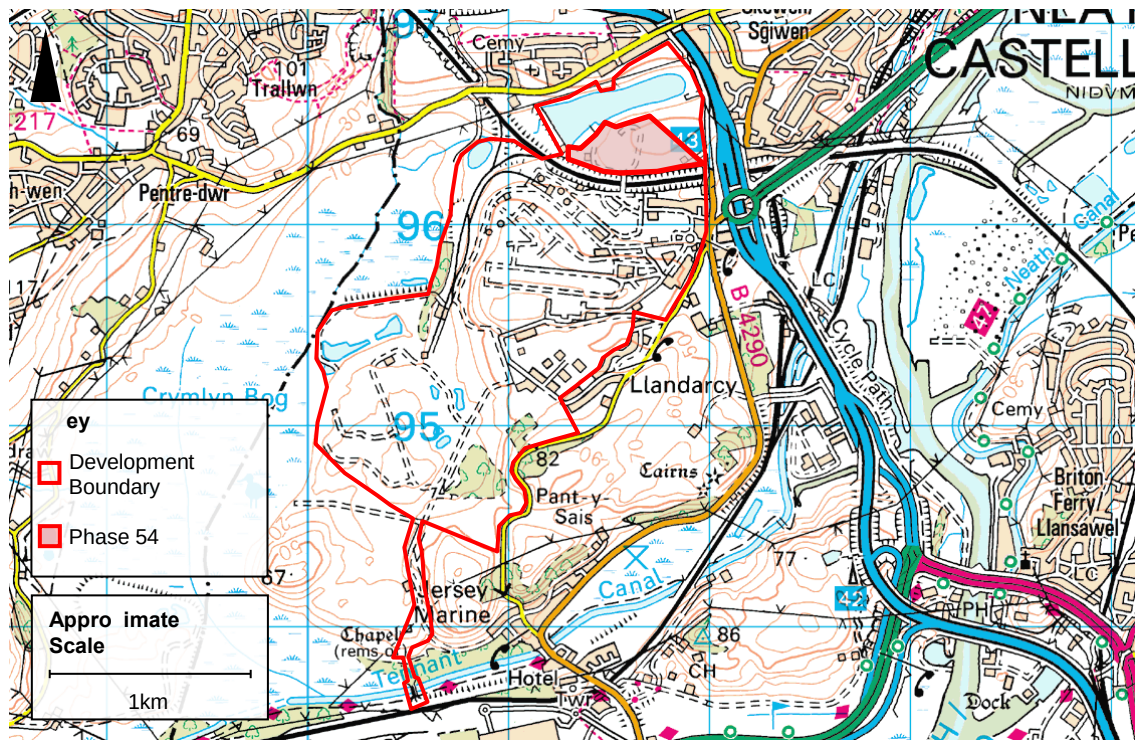


Figure Location plan

A development layout is yet to be confirmed for Phase 54, however an outline layout is shown on the current masterplan drawing reference 1332/400/MP/SK/TERT Revision H, a copy of

which is provided in **Appendi A**. With reference to the drawing it should be noted that whereas the intended use has been declared as commercial, Phase 54 is actually shown to be within an area of proposed residential development. Despite this discrepancy, the Monitor is obliged, under the Monitor's Deed of Appointment, to certify the phase against whichever intended use is declared by the developer, irrespective of what is shown on the masterplan. Nevertheless it must be noted that further remediation works will be required if the phase is to be redeveloped for residential use in the future.

In accordance with the requirements of the Monitor's Deed of Appointment, this RRWCC shall:

- Describe the remedial action which in the Monitor's professional opinion has been carried out for the purposes of completing the redevelopment remediation works in relation to Phase 54; and
- Certify whether or not in the Monitor's professional opinion the redevelopment remediation works have been satisfactorily completed for Phase 54 in accordance with the purpose, objectives and requirements of Schedule 8 of the Section 106 Agreement, having regard to the intended use.

A copy of Schedule 8 of the Section 106 Agreement is provided in **Appendi B**.

Bac ground

Objectives of the Redevelopment Remediation Works

Part One of Schedule 8 of the Section 106 Agreement outlines the purpose and objectives of the redevelopment remediation works as follows:

- The purpose and objectives of the redevelopment remediation works are the carrying out of all such remedial action over and above that actually carried out as part of the RAP Works that is necessary in order to make each part of the property suitable for its intended use. A part of the property will only be suitable for its intended use if and when the Phase Works Completion Date (PWCD) is declared in respect of that part of the property.
- This objective will be deemed to be met for the purposes of the Section 106 Agreement and the RMA on the date specified in a notice from CDL declaring the PWCD for the phase. The PWCD will be declared once CDL is satisfied that the remediation necessary for the specified intended use for the phase has been completed.

Part Two of Schedule 8 of the Section 106 Agreement places a number of obligations on SMD as the Developer. The main obligations pertinent to this phase are as follows:

- The Developer shall carry out or procure the carrying out of all Remedial Action necessary in order to achieve the purpose and objective as outlined in Part 1 of Schedule 8 of the Section 106 Agreement. The design and specification of any remediation shall take account of the principles and objectives and the design assumptions for the RAP Works and shall not prejudice the achievement and future sustainability of these principles and objectives.
- In order to determine the need for Remedial Action in the first place it is necessary to undertake an appropriate site assessment. This assessment needs to take account of the site history, potential and/or actual measured extent of contamination and the associated implied risk. Only by developing a thorough understanding of both potential and actual contamination will it be possible to confirm that all necessary Remedial Action likely to have been completed. This obligation should be satisfied through completion of an appropriate desk study and intrusive investigation.
- The Risk Based Screening Levels (RBSLs) set out in Tables 1 and 2 [in Schedule 8 of the Section 106 Agreement] and the aesthetic criteria, remediation quality and scope