

14050/LW

22 June 2023

Maes Newydd
Llandarcy
Neath Port Talbot
SA10 6JQ

For the attention of Hannah Roberts

Dear Sirs,

Planning Application: P2022/0589 – Earlswood Depot, Jersey Marine

We write further to regulatory response from Natural Resources Wales (NRW) Planning Department Ref. CAS-217758-F5G9 dated 23rd May 2023 relating to planning application P2022/0589 and provide the following further information to the queries raised.

For ease of reference below I have cited the original queries in italics.

‘Clarification is required as whether any precautions and/or protocols were followed for the collection of samples to be analysed for perfluorooctane sulfonic acid (PFOS) and perfluorooctanoic acid (PFOA)? PFOS and PFOA are known within the industry to require careful sampling as it is found in many common materials that may be present when sampling (such as waterproof clothing, plastic bottles, etc.) therefore when their presence is reported, the precautions taken to prevent cross contaminations are usually specified’.

During the sampling process appropriate procedures were followed to prevent cross contamination, which included the use of powderless nitrile gloves that were changed between each sampling location (and appropriately disposed), the use of appropriate clean sample containers that were provided by the laboratory. The samples were stored within laboratory provided cool boxes, stored out of direct sunlight and were dispatched to the laboratories as soon as possible following completion of the site works.

'Section 6.2 of the Site Investigation Report refers to adopted screening values for the assessment of PFOS and PFOA in soils. A reference for the Environment Agency's Soil Screening Values (SSVs) has not been provided, nor has an assessment or justification for the appropriateness of the use of this as a suitable screening criteria. This should therefore be provided'.

Soil Screening Values (SSVs) published by the Environment Agency were deemed appropriate for the assessment of PFOS and PFOA in soils, as published by the Environment Agency in 2017 within 'Derivation and use of soil screening values for assessing ecological risks, Report – ShARE id26'.

'Intrusive investigation locations do not appear to have been targeted. Further information with regard to the appropriateness of sample frequency and locations is required to be provided as is standard practice, set out in guidance notes such as 'BS10175:2011+A22017 Investigation of potentially contaminated site, code of practice' that the report references'.

The intrusive locations were located across the development site area to obtain representative coverage of the area. A total of 12 representative samples of the made ground were tested for contamination from a range of depths across the development area. Therefore, it is considered that the site has been adequately targeted to gain an understanding of the ground conditions and to obtained relevant samples of the made ground.

The proposed development comprises construction of a structure/building within the existing building. Representative soil samples have been obtained on both sides of the proposed structure and therefore it is considered that any contamination within this area would have been detected within the samples tested.

'No leachate analysis or groundwater sampling has been undertaken. This should be provided to aid understanding of risk to groundwater. Section 8.5 does not meet good practice standards for the assessment of risk to controlled waters. The guidelines listed below should be followed and report updated'.

The site investigation identified elevated concentrations of arsenic and lead, along with the presence of asbestos fibers within the underlying made ground. In the developed state, the site surface will be covered by hardstanding only, with no areas of soft landscaping.

The existing and proposed hardstanding, with formal drainage, provides an impermeable barrier between any surface activities and the underlying ground. The areas of hardstanding essentially encapsulate the underlying made ground, breaking the pathway linkage by preventing infiltration of rainwater into the made ground and the potential for subsequent leachate generation from the made ground and the potential for vertical migration of unacceptable leachate concentrations to impact the underlying ground/groundwater. It is considered that in the context of the existing and proposed development, the potential risk to the underlying groundwater is low and therefore there is no requirement for any additional leachate and/or groundwater analysis.

We trust the above and enclosed are to your satisfaction. However, if you have any queries or require any further information, please do not hesitate to contact us.

Yours faithfully,



For
Intégral Géotechnique (Wales) Limited