



Ref: 3548/AJ/04

25th November 2021

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SLATE WHARF, MANCHESTER - APPROVAL OF IMPORTED TOPSOIL AND SUBSOIL STRATEGY AND WATER MAIN SPECIFICATION FOR DISCHARGE OF CDN/21/0675 Condition 6a

IGE Consulting have provided a response in relation to the Manchester City Council Environmental Health Officer's comments dated 15th November 2021 with regards to Condition 6 of CDN/21/0675. The below response has been provided for discharge of condition 6.

'We will require a strategy submitting with regard to the sampling analysis and assessment of the clean soils being brought onto site.'

A PE Barrier Type A water supply has pipe has been proposed. The installation will require validation to address part b) of the condition.

A strategy for reporting and assessment of any unexpected contamination has been proposed which we can accept and the details, or confirmation that none were uncovered should be included in a final verification report'

Sampling Strategy

Imported topsoil and subsoil will be required for the soft landscaping / public open space areas on-site.

Imported topsoil and subsoil is required to be tested at source prior to import to confirm suitability. All topsoil and subsoil, whether site-won or imported is required to be tested at the following frequency:

Source	Material End Use	Sampling Frequency ¹	Testing Suites ³ (see below)
Greenfield Source:	Topsoil	1 per 200m ³	A, B, C, D, F, H
	Subsoil	1 per 200m ³	A, B, C, D, F
Brownfield Source:	Topsoil	1 per 50m ³	A, B, C, D, F, H
	Subsoil	1 per 100m ³	A, B, C, D, F
	General Fill ²	1 per 1000m ³	A, B, C, E, G

- 1) Minimum 3 samples regardless of volume.
- 2) 'General Fill' is material used primarily to raise levels, specifically not within areas of private gardens, public open space, or soft landscaping, e.g. 6F2.



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- 3) In addition to the standard suites given, the laboratory testing suite should include any additional contaminants of concern based on the source of the samples.

Testing Suites:

- A.** Asbestos ID, Asbestos quantification.
- B.** pH, total and free cyanide, soluble sulphate, organic matter.
- C.** Arsenic, Beryllium, Boron, Cadmium, Chromium (III and VI) Copper, Lead, Inorganic Mercury, Nickel, Selenium, Vanadium, Zinc.
- D.** Speciated PAHs: Naphthalene, Acenaphthylene, Acenaphthene, Fluorene, Phenanthrene, Anthracene, Fluoranthene, Pyrene, Benzo(a)anthracene, Chrysene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Benzo(a)pyrene, Indeno(1,2,3-cd)pyrene, Dibenzo(a,h)anthracene, Benzo(ghi)perylene.
- E.** Total (non-speciated) PAHs.
- F.** Speciated Total Petroleum Hydrocarbons (TPH): Aliphatic >EC5 - EC6, >EC6 - EC8, >EC8 - EC10, >EC10 - EC12, >EC12 - EC16, >EC16 - EC21, >EC21 - EC35, and > EC35 - EC44, and Aromatic >EC5 - EC7, >EC7 - EC8, >EC8 - EC10, >EC10 - EC12, >EC12 - EC16, >EC16 - EC21, >EC21 - EC35, > EC35 - EC44.
- G.** Total Petroleum Hydrocarbons (TPH): TPH EC6 – EC40.
- H.** BTEX: Benzene, Toluene, Ethylbenzene, p- & m-xylene, o-xylene. Methyl tertiary butyl ether (MTBE).

Once tested, the results are to be compared against the following Acceptability Criteria (appropriate GACs highlighted in **orange**):

Suite	Determinand (mg/kg unless stated)	Acceptability Criteria for:			
		Private Gardens	Public Open Space (residential)	Soft Landscaping or Public Open Space (Park)	General Fill
A	Asbestos (%)	ND	ND	ND	<0.001 – 0.01%
B	pH	>6 - <8 ⁽³⁾	>6 - <8 ⁽³⁾	>6 - <8 ⁽³⁾	>5 - <10 ⁽³⁾
	Total Cyanide	0.5 ⁽³⁾	0.5 ⁽³⁾	0.5 ⁽³⁾	0.5 ⁽³⁾
	Free Cyanide	0.5 ⁽³⁾	0.5 ⁽³⁾	0.5 ⁽³⁾	0.5 ⁽³⁾
	Soluble Sulphate (mg/l)	500 ⁽³⁾	500 ⁽³⁾	500 ⁽³⁾	500 ⁽³⁾
C	Arsenic	37	79	170	640
	Beryllium	1.7	2.2	63	12
	Boron	290	21000	46000	240000
	Cadmium	11	120	560	190
	Chromium (III)	910	1500	33000	8600
	Chromium (VI)	6	7.7	220	33
	Copper	2400	12000	44000	68000
	Lead	200 ⁽¹⁾	630 ⁽¹⁾	1300	2330 ⁽¹⁾
	Inorganic Mercury	40	120	240	1100
	Nickel	130	230	800	980
	Selenium	250	1100	1800	12000
	Vanadium	410	2000	5000	9000
D	Zinc	3700	81000	170000	730000
	Naphthalene	2.3	4900	1200	
	Acenaphthylene	170	15000	29000	
	Acenaphthene	210	15000	29000	
	Fluorene	170	9900	20000	
	Phenanthrene	95	3100	6200	
	Anthracene	2400	74000	150000	
	Fluoranthene	280	3100	6300	
	Pyrene	620	7400	15000	
	Benzo(a)anthracene	7.2	29	49	

	Chrysene	15	57	93	
	Benzo(b)fluoranthene	2.6	7.1	13	
	Benzo(k)fluoranthene	77	190	370	
	Benzo(a)pyrene	2.2	5.7	11	
	Indeno(1,2,3-cd)pyrene	27	82	150	
	Dibenz(a,h)anthracene	0.24	0.57	1.1	
	Benzo(ghi)perylene	320	640	1400	
E	Total PAHs				1000 ⁽⁴⁾
F	TPH-CWG - Aliphatic >EC5 - EC6	42	570000	95000	
	TPH-CWG - Aliphatic >EC6 - EC8	100	600000	150000	
	TPH-CWG - Aliphatic >EC8 - EC10	27	13000	14000	
	TPH-CWG - Aliphatic >EC10 - EC12	130	13000	21000	
	TPH-CWG - Aliphatic >EC12 - EC16	1100	13000	25000	
	TPH-CWG - Aliphatic >EC16 - EC21	65000	250000	450000	
	TPH-CWG - Aliphatic >EC21 - EC35				
	TPH-CWG - Aliphatic > EC35 - EC44	65000	250000	450000	
	TPH-CWG - Aromatic >EC5 - EC7	70	56000	76000	
	TPH-CWG - Aromatic >EC7 - EC8	130	56000	87000	
	TPH-CWG - Aromatic >EC8 - EC10	34	5000	7200	
	TPH-CWG - Aromatic >EC10 - EC12	74	5000	9200	
	TPH-CWG - Aromatic >EC12 - EC16	140	5100	10000	
	TPH-CWG - Aromatic >EC16 - EC21	260	3800	7600	
	TPH-CWG - Aromatic >EC21 - EC35	1100	3800	7800	
	TPH-CWG - Aromatic > EC35 - EC44	1100	3800	7800	
G	TPH > EC6 - EC40				5000 ⁽⁴⁾
H	Benzene	0.087	72	90	
	Toluene	130	56000	87000*	
	Ethylbenzene	47	24000	17000*	
	p & m-xylene	56	41000	17000*&***	
	o-xylene	60	41000	17000*	
	MTBE (Methyl Tertiary Butyl Ether)	LOD ⁽³⁾	LOD ⁽³⁾	LOD ⁽³⁾	

LQM/CIEH S4ULs for Human Health Risk Assessment (3rd edition, 2015) used unless stated:

- 1) Category 4 Screening Levels (March 2014)
- 2) CL:AIRE Soil GAC for Human Health Assessment (January 2010)
- 3) In-house screening criteria used as no GAC methodology currently exists
- 4) Hazardous waste thresholds. This limit only applies to imported material, not to in-situ soil.

Assumed 1% SOM (most conservative) for those values dependent upon SOM.

ND = Not Detected

LOD = Limit of Detection

*Exceeds vapour saturation limit

**Exceeds solubility saturation limit

The above acceptability criteria for PAHs for imported topsoil and subsoil are based on the published LQM/CIEH S4ULs (2015) for each individual PAH and not based on the Category 4 Screening Level using BaP as a surrogate marker. This is as the source of the imported material is unknown therefore using the surrogate marker approach may not be suitable as the distribution of PAHs in the imported material may not be similar to those in the Culp et al. (1998)¹ study. Once chemical testing had been undertaken on imported soil and the distribution of PAHs compared to the distribution in the Culp et al. (1998) study, it may be suitable to use the surrogate marker approach / C4SL.

A validation report will then be produced, including the following requirements;

- Details of the source of the cover material;
- Chemical test results to demonstrate that the soil is free from contamination and 'suitable for use' in-line with the above chemical testing suites and rates.

¹ Culp et al. (1998), A comparison of the tumors induced by coal tar and benzo[a]pyrene in a 2-year bioassay, **Carcinogenesis**, vol.19, no.1, pp.117–124.

- Waste transfer notes to provide evidence of source.
- Confirmation of 300mm cover depth by either measurement tape with photographs within the area of soft landscaping / public open space.

United Utilities Risk Assessment

An United Utilities water pipe risk assessment was undertaken (included within the IGE Consulting Combined Phase 1 and Phase 2 Geo-Environmental Report Rev B, dated October 2021), which determined that a **PE Barrier Pipe Type A** will be required for the proposed development.

In-line with the EHO's comment below, evidence of the pipe installed (i.e. manufacturers and pipe details) and evidence that any construction requirements have been complied with will be submitted as part of the final verification report. The final verification report will include the aforementioned imported soils validation and the water pipeline validation.

'A PE Barrier Type A water supply has pipe has been proposed. The installation will require validation to address part b) of the condition'

If you have queries, please do not hesitate to contact me.

Yours sincerely



Angharad Jones

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