Remediation Strategy

Atterbury Gardens, Reading

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Non-Technical Summary

What is Proposed?	It is understood that proposals involve the clearance of the site and construction of a residential development. The proposed development will comprise four semi-detached two storey houses with associated rear soft landscaped private gardens and vehicle parking spaces as well as a hardstanding access road.
What is the Problem?	A Phase 2 Site Investigation has identified unacceptable risks from contamination present on site, which requires remediation.
What is the Result?	This strategy has set out detailed remedial measures, which if correctly implemented, will reduce the risks to acceptable levels and make the site suitable for use, including: ► Borehole Decommissioning of any wells before construction starts. ► Clean Cover System (CCS) across all the proposed soft landscaped areas. ► Management of Unforeseen Contamination encountered during the remediation works.
What are the Next Steps?	This report should be submitted to the local planning authority. Once this report has been approved, the following will be required: ► This report and any previous reports should be provided to remedial contractors and those involved in waste disposal process to ensure they understand the remedial requirements in full. ► During the remediation process verification works must be undertaken by Lustre and testing, inspections etc carried out as detailed in this report. On completion of all remedial works, a Verification Report will need to be prepared and submitted to the local planning authority.

Report Record

Project Name	Atterbury Gardens
Client	Hicks Woodley
Report Type	Remediation Strategy
Report Ref	4904-RS-TH-250814
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Author	Toby Hill – BSc (Hons) AMIEnvSc
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Report Revisions

Revision Ref	Date	Author	Details
A	September 2025	Toby Hill	Amendments to the thickness of the CCS

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1.0 Introduction

1.1 This report is a methodology for carrying out remediation, along with details on verification checks and inspections required to ensure that the remediation is undertaken correctly.

What is a Remediation Strategy?

1.2 A Remediation Strategy is the third stage of a phased contaminated land assessment and is required when a site investigation has identified the presence of unacceptable risks associated with land contamination.

1.3 The purpose of a Remediation Strategy is to identify appropriate ways that any risks can be safely mitigated – typically, this involves designing measures to remove the source of contamination or breaking a pollutant linkage between the contamination and the receptor at risk of harm. Common remedial measures may include the removal of an area of contaminated soil, or the placement of a barrier of some kind to prevent the receptor (such as future residents) coming into contact with the contaminant. A strategy also includes a verification plan – a plan to check and demonstrate (through inspections, laboratory testing etc) that the remediation has been carried out satisfactorily.

1.4 It is important to note that this strategy considers ways to reduce the risk in the final development context; this does not consider the risks to site personnel during the remedial and construction phases. Find out more about Remediation Strategies here.

The Subject Site

Table 1 Site Details	
Address	Land at Atterbury Gardens, in Reading, Berkshire, RG7 5SE
Eastings, Northings	470360, 175940
Area	0.17ha

1.5 The site area is shown in Figure 1.

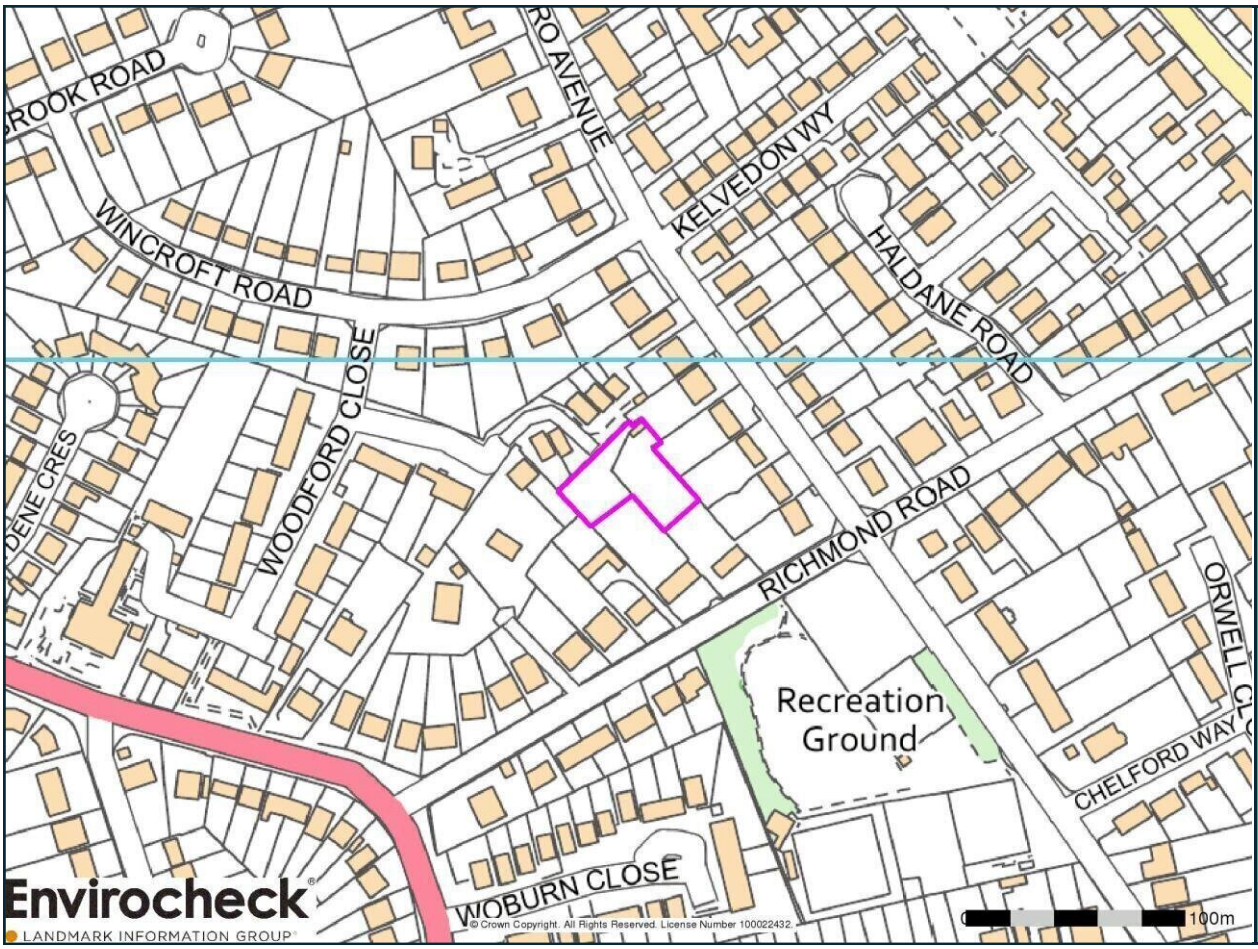


Figure 1 Site Location Plan

The Proposed Development

1.6 It is understood that the site has planning permission for redevelopment to provide a residential scheme, as illustrated in Figure 2.

1.7 The proposed development involves the construction of 4 detached houses with associated hard standing access, parking and private gardens. There are no basements, undercroft car parking or other underground structures anticipated with below ground features limited to foundations and buried services.

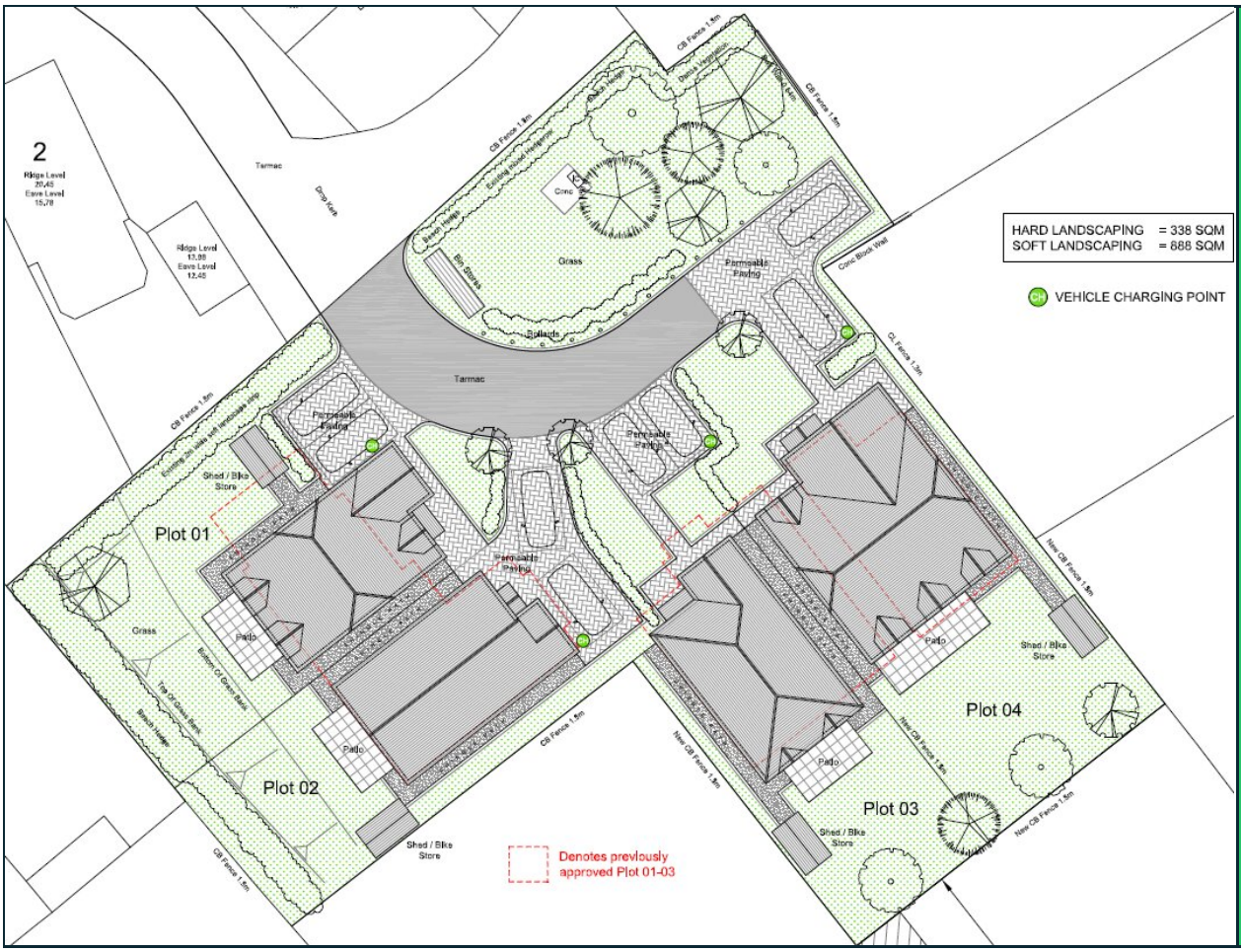


Figure 2 Proposed Development Plan

The Stakes & Objectives

1.8 This report is required to ensure the appropriate management of issues previously identified (discussed in Chapter 2) that are considered to present unacceptable risks to receptors in the final development context. Due to the historical site use, there is also a potential for unforeseen contamination to be encountered during the clearance and construction.

1.9 This report should be submitted to the LPA for comment and formal approval prior to undertaking any remedial works.

1.10 The objective is therefore to ensure the risks are reduced to safe levels and the site made suitable for use under the planning regime.

Health and Safety, Environmental and Duty of Care Plan

Asbestos in Soils

1.11 Asbestos in soils has been identified on this site in the previous site investigation works.

ACUTE RISK FROM ASBESTOS

Asbestos fibres / ACM have been identified within the Made Ground on site. The groundworks contractor should prepare a detailed method statement for the excavation, handling and storage of asbestos contaminated soil (ACS); this remediation strategy report does not provide a specific risk assessment /methodology for groundworkers who may be working with asbestos contaminated soils. Some general guidance is however provided in Chapter 4 and Appendix B on managing ACS.

Asbestos in Buildings

1.12 This Remediation Strategy does not include the identification, assessment, removal or validation of asbestos within any structures both above and below ground (i.e. basements, services, floor slabs). A refurbishment and demolition survey should be carried out by an appropriately experienced and qualified asbestos surveyor, ideally with a license to undertake work with asbestos. This report is for the identification, management and remediation of asbestos containing soils, normally unlicensed work. Further information is provided in Appendix B.

Waste Soil Management

1.13 Validation works set out in this strategy, and therefore to be documented in the subsequent Verification Report, will relate to the off-site spoil disposal of arisings generated by the remedial tasks set out herein only and not for the general off-site soil disposal relating to general earthworks. The LPA or their planning consultee(s) should confirm in writing if the Client requires formal verification and provision of documentation/checks for any spoil requiring off-site disposal generated by non-remedial earthworks.

1.14 However, regardless if the spoil arises from remedial works, it is expected that the Client and their appointed contractors, as part of their Duty of Care under the (Environmental Protection Act (1990)) legislation, will record and retain suitable records and undertake appropriate due diligence checks relating to general off-site spoil disposal and importation

of earthworks materials in accordance with the Environment Agency's Technical Guidance WM3.

Selection of Contractors

1.15 The Client is responsible for ensuring those commissioned to implement the various measures set out in this strategy are competent to do so and have the correct type and level of insurance suitable for the specific task. Where required by any regulations, laws or other such legislative controls, suitably licenced and approved specialists should be used (i.e. licenced waste carriers). Further information on the approach to selecting appropriate remedial measures and the expectations of contractors is detailed in Appendix C. It is recommended that, following approval of this report by the regulator and prior to the commencement of works, written confirmation be sought by the Client from all relevant contractors to ensure their awareness and understanding of this document.

Report Structure, Limitations & Changes

1.16 Chapter 2 presents a summary of environmental risk assessment upon which this strategy is based. Chapter 3 sets out the approach, staging and components of the remediation works including the validation plan, with and recommended health and safety and environmental control measures presented in Chapter 4.

1.17 This assessment has been undertaken in accordance with our Terms & Conditions. Full details on limitations and reliance are provided in those Terms. Third party information which has been reviewed and used to inform the assessments presented herein, including public records held by various regulatory authorities and environmental database data has been assumed to be true and accurate.

1.18 This assessment has been carried out to determine the potential risks posed to future end users, along with other key receptors, based on the current development. Should revisions in the development proposals result in a change any assessment parameters detailed in this report, a re-assessment of the risk should be carried out.

2.0 Assessment Summary & Remedial Objectives

2.1 This Remediation Strategy has been prepared based on the following works/reports which should be read in conjunction with this strategy:

- Phase 1 Desk Study Report, Lustre Consulting, May 2019 (Ref: 3170 - 190503 – JMrv1)
- Phase 2 Site Investigation Report Rev A, Lustre Consulting, August 2025 (Ref: R225-SI-01.1_4904)

2.2 A Conceptual Site Model (CSM) was presented in the previous investigation report, which identified potential sources of contamination and a range of receptors. Based on the development proposals, these were investigated to determine the presence of any viable source-pathway-receptor pollution linkages. Any viable linkages were then subject to analysis and assessment. The findings of the various quantitative assessments are summarised below.

Table 2 Geoenvironmental Assessment Summary

Assessment	Key Findings	Risk
Generic quantitative risk assessment (human health)	2 samples from WS02 at 1m bgl and 2.5m bgl as well as 1 sample from WS04 at 0.2m bgl recorded concentrations of lead above the residential land use risk criteria. Loose chrysotile asbestos fibres were also identified within WS02 at 2.5m bgl.	Medium
Water pipeline suitability test	None of the determinands analysed exceeded the potable water pipe criteria for either PE or PVC pipes.	Low
Phytotoxicity assessment	Concentrations of copper, nickel and zinc were recorded below their phytotoxicity threshold values within samples from both the Made Ground and natural soils where those soils could be used as a growing medium.	Low
Groundwater quality assessment	Groundwater was not encountered during the site investigation or on any of the subsequent monitoring visits and as such was not considered a viable receptor.	Low
Waste classification assessment (WM3)	None of the determinands tested for exceeded the hazardous waste thresholds and, as such, the soils are not considered to be hazardous waste. WAC testing would be required to determine if the soils should be disposed of as either inert waste or stable non-reactive hazardous waste to be disposed of at a non-hazardous landfill.	
Ground gas assessment	Based on the Modified Wilson and Card /NHBC method and the calculated GSVs, the site has been classified as Characteristic Situation 1 /'Green'. As such, a negligible ground gas regime has been identified.	Low

Remedial Objectives

2.3 The scope of this report is to consider remedial measures required to permit the safe development of the site and render it "suitable for use" under the planning system. Remedial measures are therefore only included which consider risk mitigation for future site users and other environmental receptors; this report does not specifically consider risks to construction workers or more generally from construction related activities.

2.4 The objectives of the proposed remediation works are to ensure:

- Validation of the removal of contaminated soils from soft landscaped areas;
- Validation of any imported topsoil and subsoil for use in soft landscaping, to be tested against a backfill specification;
- Overseeing the decommissioning of boreholes;
- Provide advice/undertake waste classification assessment(s) to inform the off-site disposal of any hazardous and non-hazardous soils depending the suitability for reuse and waste classification (including pile and ground beam arisings);
- Validation of the off-site spoil disposal of arisings generated by the remedial actions set out herein only; and
- Management of any 'unforeseen' potentially hazardous materials or areas of ground contamination.

3.0 Remediation & Verification Strategy

Introduction

3.1 This chapter provides detail on each remedial measure that is required to ensure the development is suitable for use. Information on how each remedial measure should be implemented, along with any relevant details on recommended materials, inspection requirements, the need for specialist contractors and third-party documentation. This chapter also sets out the proposed verification methodology including validation sampling and testing and completion reporting in line with the Environment Agency's *Evidence, Verification of Remediation of Land Contamination*[1].

3.2 The remedial solution(s) set out in the following text have been selected based on their ability to meet all the objectives detailed within Chapter 2, with a consistent track record in similar conditions. In meeting these objectives, it is assumed that implementation of this Remediation Strategy is considered to be technically feasible and easily verified to ensure regulator acceptance, and that any residual contamination is deemed acceptable – i.e. that residual contamination is below publicly available guideline values, or that any barrier measures meet the necessary engineering requirements and is fit for purpose.

3.3 Typically, for simple and routine contaminated land issues or where prescribed remedial measures are available in the guidance, a shortlist of options or a single chosen remedial solution may have already been identified in the previous investigation. In addition, it is noted that other factors may have limited the initial options considered in the selection of remedial solutions such as the development programme, site constraints (such as available space), waste management options, financial, Client preference, construction type of buildings etc.

[1] Environment Agency, Evidence, Verification of Remediation of Land Contamination, SC030114/R1, 2010.

3.4 The approach to selecting appropriate remedial measures in accordance with the Land contamination risk management guidance (LCRM) and CIRIA Report C662[2] is detailed within Appendix D.

Overview of Remedial Tasks

3.5 The remedial measures that are required for this site are summarised below:

- Borehole Decommissioning
- Clean Cover System (CCS)
- Management of Unforeseen Contamination

3.6 The remedial measures above have been selected based on our current understanding of the development layout, configuration and building construction methods. Where construction designs change, these details should be checked to ensure compliance with the overall objectives.

Notification to Environmental Consultant

3.7 Prior to implementing any remedial measure listed above, contact should be made to the Environmental Consultant to ensure the preparatory works are suitable. The following contact details can be used:

Lustre Consulting: 01634 757 705 or info@lustreconsulting.com

General Verification

3.8 Following the completion of each remedial task, a photographic record will be collected by the Environmental Consultant and presented within the final Verification Report. A copy of all certificates / documents associated with the remedial tasks will be included within the Verification Report. Further detail on the structure of the Verification Report is provided within Chapter 4.

[2] CIRIA Selection of remedial treatments for contaminated land – A guide to good practice, 2004

Sequence of Remediation

3.9 Based on the information available at the time of writing, the remedial measures have been set out in the order in which they are likely to be undertaken during development. However, the principal contractor's programme will ultimately determine when each element is carried out. As mentioned at the start of the Chapter, notes have been made where involvement or a site inspection will be required by the Environmental Consultant. Specific details on the need for sampling or other third-party verification is also given for each measure/task, along with the requirement for the Client/ contractors to provide any verification documentation.

General Comments on Asbestos Contaminated Soils

3.10 As noted previously, asbestos fibres have been identified within the Made Ground on site. It important that information on the presence of asbestos in soils is passed on to any groundworkers undertaking works on site, not just those involved in the implementation of remedial measures. The groundworks contractor should prepare a detailed method statement for the excavation, handling and storage of asbestos contaminated soil. The method statement and assessment must be undertaken by the groundworker who has an understanding of how the works will actually be carried out on this site. In short, the contractor's assessment and documentation will be required to ensure the safe excavation, storage and subsequent off-site disposal of asbestos contaminated soil. Due care is required when handling asbestos contaminated soils as part of the general earthworks, particularly noting that conditions may change as more of the ground is inspected during enabling and construction works. It is also noted that if asbestos contaminated soils are present on site <u>and</u> do not pose a risk to future users in the final development context, specific remedial measures may not be documented in this report. Lustre acknowledges that general earthworks may still encounter and process these contaminated soils without specific controls under this strategy and so further general guidance is provided in Appendix B to aid the contractor in this regard.

General comments on Waste Disposal and Imported Soils

3.11 The Client and contractors involved in the excavation, segregation and off-site disposal are responsible for the correct management and pre-treatment of waste spoil generated by all earthworks. These parties have a duty of care which requires suitable management and disposal of wastes in accordance with the regulations. **Given that Lustre does not have any significant involvement during the earthworks phase, full responsibility for waste management rests with the principal contractor/waste producer**.

3.12 The contractor must provide a record of the volumes of soil removed from, and imported to, site.

Watching Brief / Unforeseen Contamination

3.13 A non-specialist (full-time) watching brief will be maintained by an appropriate person on-site throughout the works who is experienced and capable of identifying signs of potential contamination, including discolouration/staining, unfamiliar odours and visual evidence of potentially contaminated/ hazardous materials. This person would normally be a site manager and/ or nominated sub-contractor carrying out groundworks, demolition and enabling works when unforeseen contamination may be encountered.

3.14 There is always a potential for unforeseen contamination to be encountered during any redevelopment works, particularly when groundworks are being carried out and the site cleared of existing structures and hardstanding. In this case there is a particular potential to uncover unforeseen contamination given the site forms part of an infilled pit. A non-specialist watching brief will be particularly important when working within the vicinity of areas that were not investigated, or the method of investigation employed was limited. Key areas will be within the footprint of previous structures which were not readily accessible in the previous investigation. As such, there is a potential for hazardous ground conditions /contaminated soils to be encountered during the development works, which were not recorded during the previous intrusive investigation.

3.15 Should any unforeseen contamination (material or potentially contaminated soils and/or water such as stained, oily or malodours materials, or possible asbestos etc.) arise during the development works, the appointed person and/or site manager must contact Lustre

Consulting (specialist watching brief see below) to arrange a site visit for inspection, assessment and sampling (if required). The Environmental Consultant (and author of this document) should be contacted immediately to:

- Visually inspect the suspected contamination/ materials;
- Estimate the volume and extent;
- Note any corresponding odours and/or staining;
- Take samples for testing to confirm type/nature of materials/ contamination present; and
- Undertake a suitable risk assessment and addendum to the Remediation Strategy.

3.16 It may be recommended that the contamination is excavated and stockpiled in order to allow further assessment and classification whilst site works continue with minimal disruption to the construction programme. The nature and means of managing the unforeseen contamination will be recorded accordingly and included in the Verification Report. Following assessment of the unforeseen materials, the Client should notify the local planning authority – this may be a planning requirement of the decision notice.

3.17 A **specialist** watching brief will be undertaken by the Environmental Consultant at key stages during the works, such as during key stages of the works as set out in the remainder of this Chapter. It is envisaged that the specialist watching brief will entail several site visits to address the above, and also to attend site at the request of the site manager if unforeseen contamination is encountered. In addition, the contractor will be responsible for the management of contaminated surface water run-off and the protection of into nearby roads and drains.

BOREHOLE DECOMMISSIONING

Boreholes installed during previous investigations can present preferential pathways to deeper groundwater. Sensitive groundwater in the vicinity of the site means that the boreholes need formal decommissioning as part of the redevelopment works.

Remedial Measure
Boreholes decommissioned in line with the Environment Agency's Good Practice for Decommissioning Redundant Boreholes and Wells[3].
Environmental Consultant Supervision Required?
✔ YES
Recommended Material / Product
Bentonite OR Bentonite Liquid Grout
Scope / Instructions
Borehole covers, caps and gas taps should be removed. Surrounding hardstanding should be removed and a pit to be excavated around the pipe to around 1m bgl. The pipe should then be cut at this depth. Considering the monitoring well design / arrangement and the geological and hydrogeological conditions, the residual filter pack may present a contamination short-circuit pathway to deeper groundwater. As such the remaining standpipe should be backfilled with a bentonite slurry / liquid grout to ensure the surrounding filter pack is also suitably decommissioned. Alternatively, should the contractor wish to do so, borehole standpipes could be pulled from the ground using an excavator and the resultant hole backfilled with bentonite. Each borehole will be completed with a small concrete cap up to 0.5m below the finished levels to ensure minimal disturbance during the subsequent enabling works.
Contractor/ Client Documentation Required
No documentation required. However enough notification must be given to **undertake this work before site clearance, demolition and excavation works.** Any wells to be retained during the works must be protected from damage.
Validation Measures
Full-time attendance by the Environmental Consultant will be required for borehole decommissioning. Supervision will be required to ensure no pollution short-circuit pathways are created by the works and to verify appropriate decommissioning.

[3] Environment Agency, Good Practice for Decommissioning Redundant Boreholes and Wells, January 2012

CLEAN COVER SYSTEM

A clean cover system (CCS) is required to mitigate the risks from shallow soil contamination to end users in areas of soft landscaping. The CCS will not only provide clean, safe soils for end users but also prevent exposure to any residual contamination at depth. The CCS mitigates the risk by breaking the exposure pathways between any contaminated Made Ground and future end users through the construction of a CCS.

Based on the proposed development and the findings of the site investigation, the following are required:

- *CCS-600* should be implemented in all private garden areas.
- *CCS-300* should be implemented in all areas of soft landscaped borders and verges.

A CCS with the incorporation of a high visibility marker layer to all soft landscaped areas is therefore considered sufficient to reduce the risks posed by these contaminants to acceptably low levels.

Any soils imported to site to create the CCS must be proved to be suitable for use and undergo verification testing at various stages of purchase, importation and placement. See the Flow Chart for the step-by-step process on importing soils.

Remedial Measure
Implementation of a CCS within proposed soft landscaped areas. The anticipated configuration and extent of the CCS is shown on Drawing 4904-002.
Environmental Consultant Supervision Required?
✔ YES
Recommended Material / Product
Soils and materials used in the CCS, including any site-won soils, imported soils and imported aggregate, will require various stages of testing and validation. Material imported for the formation of the CCS shall be obtained from a validated source. Ideally, all newly imported soils (not reused) should meet the minimum standards in BS3382:2015[4]. Imported soils must comply with the backfill specification in Appendix E for chemical suitability. Further information is provided on the Flow Chart.
Scope / Instructions
STEP 1 – Reduction of site levels: Any area where the CCS is to be placed should be excavated to reduce the site level by the appropriate amounts (i.e. 300mm for CCS-300, 600mm for CCS-600) from the final formation level. <u>However, if 'clean' natural soils are encountered at a shallower depth during excavation the CCS can terminate at this shallower depth.</u> **STEP 2 – Inspection of Reduced Dug Areas:** Inspections will be required by the Environmental Consultant to ensure that the correct depths have been achieved for the CCS areas and also to ensure that no significant contaminated soils are left in-situ. Should grossly contaminated soils be encountered, further assessment may be required and potentially source removal or additional engineered barriers added to the CCS.

[4] BS 3882:2015 Specification for Topsoil. 2015

STEP 3 – Approval of Soils for CCS: See Flow Chart.

STEP 4 – Placement of CCS materials/soils: Placement of the following:

- a high visibility geotextile marker layer
- approved subsoil material - a minimum of 150mm for CCS-300 a minimum of 450mm for CCS-600
- a minimum of 150mm approved topsoil.

A high visibility marker layer is required at the base of the CCS to warn future site users as to the potential for contaminated material below and prevent soil mixing between the in-situ potentially contaminated soils and the CCS.

Contractor/ Client Documentation Required

The Flow Chart provides details on the documents that should be provided to the Environmental Consultant regarding imported materials. For ease of reference, these are provided below:

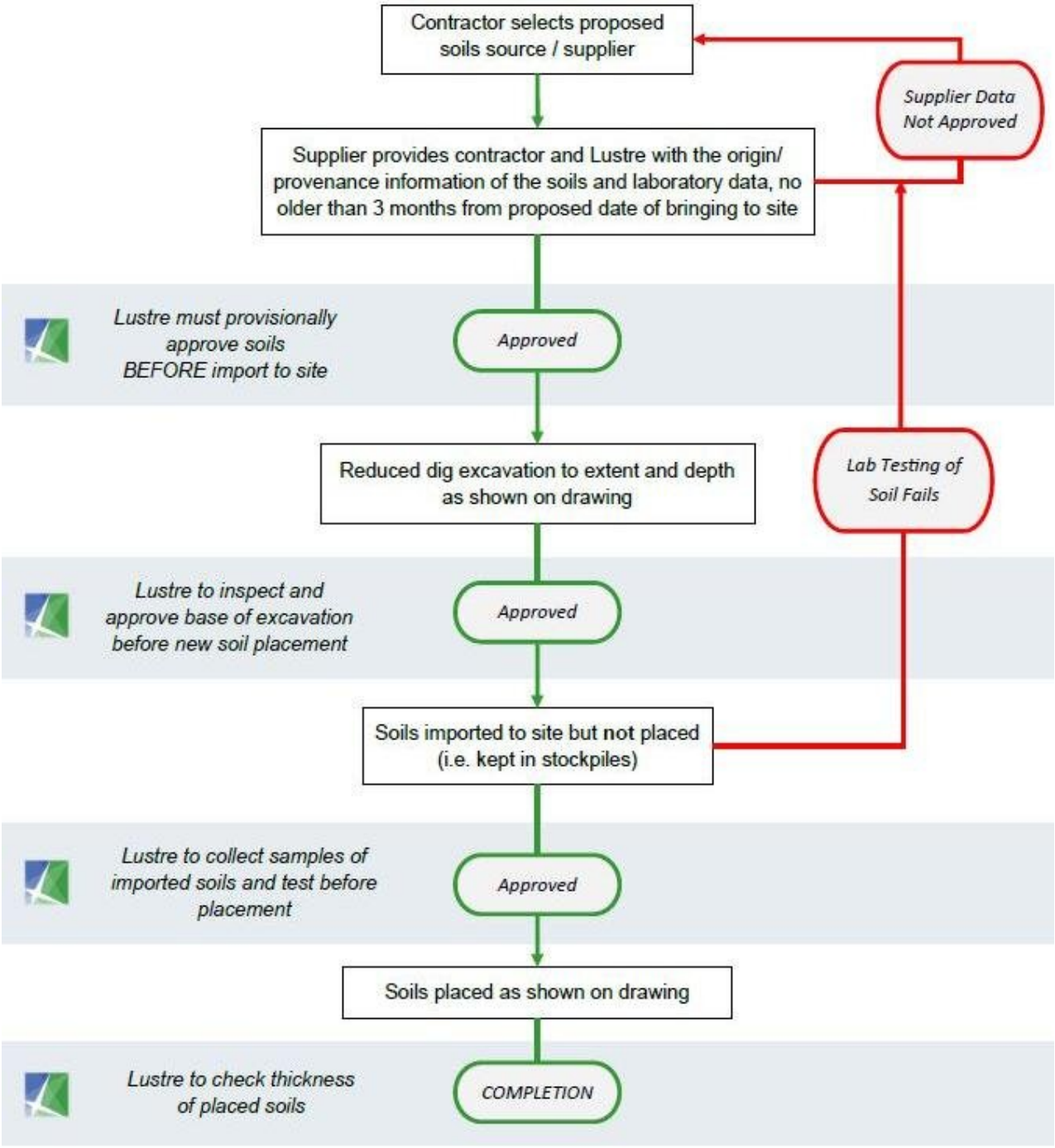
- Provenance information and laboratory testing of soil source dated within last three month (from date of import)
- Waste tickets associated with excavation
- Delivery tickets for imported materials

Validation Measures

Part-time attendance by the Environmental Consultant will be required. Validation of the following elements as per the Flow Chart:

- Approval the soil source
- Approval laboratory data and provenance information from soil source against Backfill Specification (Appendix F)
- Inspection of reduced dig / excavation
- Chemical testing of imported soils (prior to placement)
- Thickness inspections of placed soils

CLEAN COVER SYSTEM FLOW CHART



NOTE 1:

Sample frequency of 1 sample per 150m^3 imported soils (minimum 3 samples per source (type)).

Chemical testing on samples and compared against Backfill Specification (Appendix F).

WASTE MANAGEMENT AND DISPOSAL

Remedial Measure
The Client and their appointed contractors, as part of their Duty of Care under the (Environmental Protection Act (1990) legislation, must record and retain suitable records and undertake appropriate due diligence checks relating to general off-site spoil disposal and importation of earthworks materials in accordance with the Environment Agency's Technical Guidance WM3. Waste validation works associated with this "remedial measure", and therefore to be documented in the subsequent Verification Report, will relate to the off-site spoil disposal of arisings generated by the remedial tasks set out herein only and not for the general off-site soil disposal relating to general earthworks. Three material types were identified (Cohesive Made Ground, Granular Made Ground and Fill Material) which were all classified as Non-Hazardous. Any soils to be disposed of off-site should be classified (i.e. hazardous or non-hazardous) and WAC (as appropriate), in line with the Environment Agency's Technical Guidance WM3.
Environmental Consultant Supervision Required?
✖ NO Lustre's involvement in waste disposal includes for the classification of the waste materials (where allowed for in scope of works) and collation of contractor's waste records, with checks against haulers and waste recipients to ensure these parties are appropriately licensed to manage waste soils (based on classification).
Scope / Instructions
Any excavated arisings associated with development works should be carefully managed to prevent mixing of different soil/waste types. Stockpiles must be appropriately managed to prevent the generation of surface run-off and generation of dusts. Measures should be implemented on site to segregate waste streams with natural material stockpiled separately from any Made Ground. Different materials/soils should be classified separately. **Any oversized and non-soil materials (such as ACMs, plastics, metals etc within any Made Ground), will require segregation from the classified soils, and separate and appropriate disposal**. Remember for soils to be classified as 'inert' it must be both non-hazardous and be found to be 'inert' through WAC testing. An 'inert' soil cannot contain non-soil materials that could decompose or be chemically or biologically reactive. Any contaminated or potentially contaminated soils not specifically addressed in this Remedial Strategy should be separately stockpiled prior to further analysis. If asbestos contaminated soils are present on site, specific measures need to be put in place to safely manage these arisings. This is documented in any remedial measures for managing ACS (if applicable), as well as in further guidance in Appendix B.
Contractor/ Client Responsibilities / Documentation Required

The Client and contractors involved in the excavation, segregation and off-site disposal are responsible for the correct management and pre-treatment of waste spoil generated by all earthworks. These parties have a duty of care which requires suitable management and disposal of wastes. Given that Lustre does not have any site presence during the earthworks phase, full responsibility for waste management rests with the principal contractor.

The Client must retain a copy of *all* waste consignment notes and waste hauler and recipient documentation and licenses. Documentation should be fully completed and clearly show the appropriate licenses and SIC number if applicable.

Waste documentation relating to the specific remedial measures set out in this strategy need to be immediately forwarded electronically to the Environmental Consultant.

4.0 Verification Reporting

4.1 A Verification Report will be completed to provide evidence that the work has been undertaken in accordance with this Strategy and to the satisfaction of any planning requirements. The Verification Report will document the following items:

- A detailed description of the works completed and a photographic record.
- A description of imported soil including chemical analysis results from the supplier(s) and validation samples and comparison against the backfill specification.
- Verification of the placement and thickness of the clean cover system.
- Verification of borehole decommissioning.
- Copies of all relevant plans, drawings, design specifications and site visit records.
- A description of the soils removed off-site and generated by the remedial works only for recycling /disposal including approximate volumes and destination details.
- Copies of all relevant waste and soil management paperwork for the soils removed off-site (soils generated by the remedial works only), including conveyance notes, waste consignment notes and delivery tickets where required.

5.0 Health & Safety, Environmental Duty of Care Plan

Introduction

5.1 This chapter sets out the Health and Safety (H&S) and environmental duty of care associated with the proposed remediation work, including information and good practice guidance related to these potential environmental hazards. This information is for the benefit and action of the responsible contractor undertaking the works and is intended as a guide only.

Asbestos Containing Soil (ACS) Management During Construction

5.2 Where asbestos has been found on site within soils, a specific remedial solution may only be required in parts of the site where a pollutant linkage is viable to future users (i.e. where a development-related risk has been identified that requires remediation under planning to render the site "suitable for use"). Conversely, asbestos within soils could be safely retained by design of the development below areas of proposed hardstanding and therefore no specific remedial measures are required in these areas. However, Lustre acknowledges that construction activities will require such asbestos contaminated soils to be worked and managed on site to facilitate the construction of roads, buildings, service trenches etc and that these activities will not be confined to areas subject to specific remedial measures. As such, ACS excavation, handling and removal will likely be required across the entire site and adequate protection and management of this material is required throughout the development.

5.3 The management of ACS is likely to be deemed under CAR 2012 as Category B Non-Licensed works, however this will require constant review by the groundwork's contractor. All site personnel should be aware of the risks of working with asbestos contaminated soils and be appropriately.

5.4 A record of where known ACS are left undisturbed (if applicable) should be made and kept with the Construction Health and Safety file/ deeds of the property. Given the risk associated with asbestos in soils it is important that any work undertaken in ACS is carried out by competent contractors under Duty of Care with the appropriate insurance, asbestos awareness training and experience in dealing with asbestos in soils / Category B Non-

Licensed works /CAR 2012. Reference can also be made to CIRIA C733 guidance. Further information on handling ACS during construction works is provided in Appendix B.

Environmental Duty of Care

5.5 All waste soil must be taken away to a licensed recycling and/or waste disposal facility by a suitably licensed haulier. Section 34 of the Environmental Protection Act (Duty of Care) should be maintained at all times, with a record of all loads kept (including conveyance and consignment notes) for inclusion into the Verification Report. All disposal facilities should be made fully aware of the nature of any waste soil including any evidence of asbestos containing materials (ACMs) by the contractor.

5.6 Provisions should be made by the contractor to contain any run-off generated from stockpiled soils, with prevention measures in place to protect surface water drains and other water courses and also to prevent cross-contamination. This should be undertaken in accordance with the recommended methods in CIRIA's technical guidance Control of Water Pollution from Linear Construction Projects5.

Construction (Design & Management) Regulations 2015

5.7 The CDM Regulations 2015[6] place responsibilities on all parties to a construction contract (including clients, designers, contractors and sub- contractors). Within this context the term "construction works" encompasses a broad range of activities including remediation. Under the regulations, whilst the client is not required to manage or supervise the works, it is recognised that the client exerts a significant influence over the way a project is carried out.

5.8 With respect to this remediation work, the CDM Regulations 2015 are applicable and since there will probably be more than one contractor carrying out works then it is assumed that a Principal Designer and/or a Principal Contractor under the definition in the regulations has already been appointed. Therefore, it is presumed that Lustre Consulting Limited will be specialist sub-consultant/ sub-contractor under the CDM Regulations 2015. To ensure compliance, the contact details of the Principal Contractor and Principal Designer should be

[5] Construction Industry Research and Information Association (CIRIA). Control of Water Pollution from Linear Construction Projects. Technical Guidance, 2006
[6] The Construction (Design and Management) Regulations 2015.

provided, and a copy of this Remediation Strategy should be incorporated into the project Construction Phase Plan and Health and Safety File prepared by the Principal Contractor.

Health & Safety at Work

5.9 There is an obligation under the Health & Safety at Work Act 1974 and all other relevant health and safety legislation to safeguard employees and any persons which may be affected by their works. The contractor and any sub-contractors carrying out the elements of work related to the remediation of the site also have duties and responsibilities under any other legislation applicable to the work that they will be carrying out. The main contractor will need to be aware of, and comply with, such duties and responsibilities. It is beholden on all personnel themselves to work at all times in a safe manner and in accordance with the instructions given to them by the individuals with designated responsibility for health and safety/environmental matters.

5.10 The Health and Safety/Environmental hazards and proposed mitigation / control measures set out in this chapter should be incorporated into any contractor method statements as appropriate and supplied to all relevant parties before remediation work commences.

5.11 All site staff should have the right to stop any remedial activities, the movement of plant or equipment etc if it is considered that there is a risk to the health and safety of personnel or damage to the environment.

Emergencies

5.12 Site personnel should follow the health and safety procedures and site rules as set out by the Client / Principal Contractor. In any event, accidents are to be reported immediately to the site manager. At no time should personnel put themselves at risk.

5.13 If the Environmental Consultant needs to be contacted following the discovery of unforeseen contamination, and also at key stages in the verification works (as set out in Chapter 3), then the following contact details should be used:

Lustre Consulting Ltd: 01634 757 705 (main office) or info@lustreconsulting.com

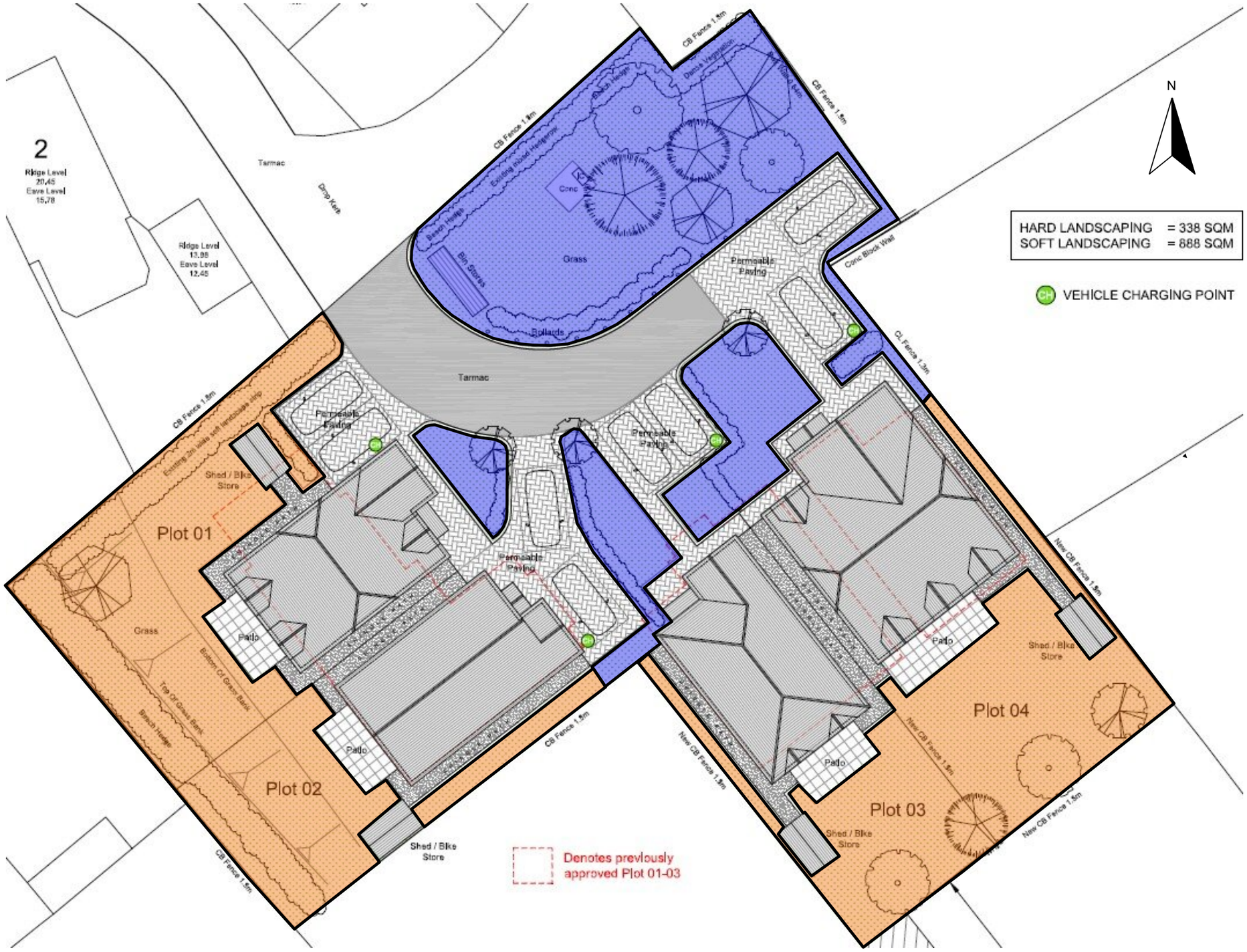
Environmental Hazard Summary

5.14 The following table sets out general environmental hazards associated with remedial works. The responsible contractor should make suitable provisions to mitigate the risks from the identified hazards. Suggested control measures are provided.

Hazard	Recommended Mitigation / Control Measures
Asbestos contaminated soils (where ACS / ACM has been identified during previous site investigation).	Refer to above text and Appendix B.
Direct contact with potentially contaminated materials during remediation works	Contact with waste and potentially contaminated soils should be prevented where possible. Disposable gloves and/or rigger gloves should be worn where there is a risk of direct contact. Consideration of the nature and toxicity of the contamination may warrant clearly defined 'clean and dirty' working areas and a dedicated decontamination unit.
Accidental ingestion of contaminated soils during remediation works	Eating, drinking or smoking will only take place within designated breakout areas away from the working area. Good hygiene practice should be adopted to minimise the risk of hand to mouth transfer.
Inhalation of hydrocarbon vapours, ground gases or contaminated dust	Appropriate dust or vapour masks will be worn within the designated working area. If a vapour mask is required due to a high vapour risk, then a face fit mask should be worn. If there is an asbestos risk then FF3 masks should be worn as a minimum. Gas risk sites should consider the risks of asphyxiation and explosion associated with, but not limited to, carbon dioxide and methane especially where gases can build up in confined spaces.
Unforeseen asbestos within the soils (and other areas of the site – not previously identified).	Should any asbestos be identified during the works, works should cease, and specialist advice may need to be sought to ensure appropriate management and off-site disposal. This will depend on the type and condition of any asbestos, such as those that are notifiable to the Health and Safety Executive including, but not limited to, friable insulation board or limpet that will require specialist handling and disposal to a suitable landfill site.
Slip and trip hazards in and around the designated working areas and falling into excavations	All staff should remain vigilant during the works and when moving around the site. Staff should ensure that the designated working area is kept clear with good housekeeping. Any excavations which are to be left open or unattended should be made safe and secure by the contractor.
Site traffic on operational site	All staff should wear appropriate PPE suitable for the hazards identified in their task specific risk assessment, including high visibility jacket or vest at all times whilst on site to make themselves visible to other site personnel. Ensure operators are aware of your presence around the site and working areas.
Hazards associated with underground services	All underground services should be cleared by the contractor prior to breaking ground.

Hazard	Recommended Mitigation / Control Measures
Elevated levels of dust generated during the remediation works	During dry windy conditions, stockpiled material should be dampened down using dust suppression methods or covered with sheeting. Measures should be implemented, such as dedicated haulage routes, wheel-washing etc to minimise dust/mud generated. This should be covered in the construction management plan.
Spillages and leakages of potential contaminants from plant during remediation work, removed USTs/interceptors (if applicable) and or from run-off from the site	Plant and equipment proposed for use should be maintained to a high standard to minimise the likelihood of oil or fuel leakage to the ground. Should a significant leakage occur, site personnel must prevent contamination of the drains. Preventative measures may include, but not be limited too, placing a temporary bund.
General nuisance and noise associated with mechanical excavators and lorries to surrounding residents during excavation works	Plant will be operated between the hours of local authority guidelines (as set out in the Decision Notice). Lorries transporting the waste materials off-site will also run during this time period.

Drawings



Key

Site Boundary

CCS-300 (300mm Clean Cover System with 150mm Topsoil Minimum)

CCS-600 (600mm Clean Cover System with 150mm Topsoil Minimum)

Notes

Do not scale from this drawing. Approximate positions only. Report all errors and omissions to author.

Rev	Date	Description
A	18/09/25	Amendment to CCS thickness in private gardens

Client / Project

Hicks Woodley
Atterbury Gardens, Reading
Land at Atterbury Gardens,
Reading,
Berkshire,
RG7 5SE

Drawing Title

Clean Cover System (CCS) Plan

Project Number	Drawing Number	Date	Designed by	Approved by
4904	002	15/08/25	TH	

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APPENDIX A: Information on Statutory Guidance

GENERAL GUIDANCE ON STATUTORY GUIDANCE

References to the term "contaminated land" in this report relate to the statutory definition of contaminated land under the published Contaminated Land Statutory Guidance unless otherwise stated (also known as Category 1 and 2 under Part 2A). That definition is*: "any land which appears to the Local Authority in whose area it is situated to be in such a condition, by reason of substances on in or under the land that –*

a) Significant harm is being caused or there is a significant possibility of such harm being caused; or

b) Significant pollution of water environment is being caused or there is significant possibility of such pollution being caused".

Other terms such as "land affected by contamination" or "land contamination" refer to the much broader categories of land where contaminants are present but usually not at a significant level of risk to be classified as contaminated land under the definition Part 2A (also known as Category 3 or Category 4 under Part 2A).

APPENDIX B: Managing Asbestos Contaminated Soils

GENERAL GUIDANCE ON MANAGING ASBESTOS CONTAMINATED SOILS

INTRODUCTION

Asbestos contaminated soils (ACS) is increasingly becoming a problem on brownfield sites. The presence/ absence of asbestos on this site is confirmed in Chapter 1 of this report, as well as in more detail in Chapter 2 (as appropriate).

This Remediation Strategy provides guidance on mitigating the risks to the future receptors based upon the proposed development layout and configuration as required by planning. This report does not address the specific risks to construction workers dealing with ACS. It is noted that although asbestos may have been identified within shallow soils within the Phase 2 Site Investigation, if there is no unacceptable risk to future site users and therefore no specific remedial measures required under the planning framework, this report may not specifically discuss asbestos in terms of "remediation".

It is important however to consider how the presence of asbestos in soils can present risks to construction workers and the general public during the development. Asbestos is also an emotive contaminant that can have public relation impacts.

However, as the extent of any ground disturbance, excavation, handling and disposal of asbestos contaminated soils as part of the wider construction/enabling activities are not known, Lustre cannot prescribe a safe methodology for this work. The groundworks contractor should therefore prepare a detailed method statement for this work and ensure that any works are undertaken in accordance with Control of Asbestos Regulations[7]. Reference can also be made to CIRIA C733 guidance on asbestos in soils[8].

GENERAL MANAGEMENT CONSIDERATIONS/GUIDANCE

Any arisings of ACS will need appropriate management, regardless of if the ACS is in an area subject to specific remediation activities. Construction management plans should consider the following:

- Licencing: *Will the works be classified as Category B Non-Licensed works and is the correct insurance in place for undertaking these works (if applicable)? If there is any uncertainty on the type or volume of material that should be handled under Category B Non-Licensed works, works should stop immediately and advice should be sought.*
- Notification to HSE: *Although the works may be non-licensed are they notifiable to HSE?*
- Training: *Suitably trained and competent site personnel should be used who have the correct level of asbestos training which is commensurate with the level of risk/work activity which is being considered (i.e. rare sporadic cement bound ACM in soils vs friable widespread ACM).*
- Information: *All staff should be aware of the risks of working with asbestos contaminated soils and be appropriately trained.*
- PPE/RPE: *Appropriate masks (minimum half face respiratory protective equipment (RPE) to FFP3 standard, or the required standard at the time of work) and disposable overalls may need to be worn when working with ACS. Are decontamination units required?*
- Signage: *The need for fencing and/or signage to notify site personnel of the hazard.*
- Cross-contamination (storage): *Excavated ACS may need to be placed in a designated area ideally on hard surfacing or thick plastic sheeting to prevent mixing with underlying soils depending on the nature any type of ACM/ACS present.*

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[7] Control of Asbestos Regulations (CAR) 2012

[8] CIRIA Asbestos in soil and made ground: a guide to understanding and managing risks (C733), 2014

- Cross-contamination (airborne): *The potential for dust generation containing asbestos fibres. During the excavation, handling and storage of ACS, consider dust suppression/minimisation techniques in the form of water sprinkling, sheeting and minimal handling/disturbance which could be employed to reduce the generation of airborne fibres.*
- Occupational health and off-site impacts: *The need, as appropriate, for background air monitoring. For example, it may be prudent to check/verify that any dust/fibre suppression controls ensure that an air quality limit of 0.1 fibres/cm^3 in air is not exceeded.*
- Cross-contamination (transport): *If plant needs to be washed down to avoid tracking potential ACS to other areas of the site.*
- Waste disposal (pre-treatment): *ACS may require pre-treatment (i.e. hand picking) to reduce the hazardous nature from a waste disposal perspective. The Environment Agency's Technical Guidance WM3[9] requires that for a mixed waste (such as Made Ground/ACS), the identifiable waste that may be more hazardous (such as ACMs, i.e. cement board etc) should be assessed and dealt with as a separate waste stream. If the soil contains identifiable fragments of asbestos (>50mm and visible to the naked eye) the fragments should, where possible, be separated from the soil by hand picking. This can be achieved during the excavation and placement of ACS in a controlled manner, for example ACS excavated/stripped off in 100mm layers. Any ACM should be double bagged and placed in a lockable asbestos skip.*
- Waste disposal: *Before disposal off-site, the ACS should have nil visible ACM and contain less than the hazardous weight threshold limit of 0.1%. Waste tickets should be retained.*
- Record keeping: *A record of where known ACS are left undisturbed (if applicable) should be made and kept with the Construction Health and Safety file/ deeds of the property.*

Remember that any work undertaken involving ACS is carried out by competent contractors under a Duty of Care with the appropriate insurance, asbestos awareness training and experience in dealing with asbestos in soils / Category B Non-Licensed works.

GENERAL GUIDANCE ON ASBESTOS IN BUILDINGS

INTRODUCTION

Under Regulation 4 of CAR[10], those parties ("duty holders") who have control over the maintenance or repair of non-domestic premises are required to identify and manage any asbestos or presumed asbestos found in their premises. Where asbestos is or is liable to be present, the duty holder(s) shall ensure that they have an adequate management plan, undertake and review risk assessments and maintain an Asbestos Register detailing the probable exposure to all employees and site users. The duty holder may be the business owner, landlord or tenant or others by virtue of a contract.

Regulation 5 requires duty holder(s) to identify asbestos prior to maintenance or any other work which exposes or is liable to expose employees to asbestos unless there has been a sufficient assessment. There is always a risk that asbestos will be present in soils, under hardstanding and below ground structures, and that it may spread particularly during clearance and demolition works. It is therefore essential that where any asbestos or presumed asbestos is identified, it is managed, removed and disposed of by a licenced remover

[9] Environment Agency, Guidance on the classification and assessment of waste (1st edition 2015) Technical Guidance WM3

[10] Control of Asbestos Regulations (CAR) 2012

(if licensable work) in accordance with relevant HSE guidance. It is the responsibility of the duty holder under Regulation 16 to ensure measures are put in place to prevent the 'spread' of asbestos.

This Remediation Strategy does not include the identification, assessment, removal or validation of asbestos within any structures both above and below ground (i.e. basements, services, floor slabs). A refurbishment and demolition survey should be carried out by an appropriately experienced and qualified asbestos surveyor, ideally with a license to undertake work with asbestos. This report is for the identification, management and remediation of asbestos containing soils, normally unlicensed work.

APPENDIX C: Approach to Selecting Remedial Contractors

APPROACH TO THE SELECTION OF REMEDIAL TREATMENTS

In accordance with good practice guidance, the selection of appropriate remedial measures has been undertaken using a systematic approach, as set out in CIRIA C662. Initially, a combination of technical and non-technical criteria has been adopted in the selection of the most suitable remedial options for the site:

- The hazardous nature (i.e. toxic, carcinogenic) of the contamination;
- Risk management (particularly for construction personnel during remediation);
- Time constraints and the development programme;
- The technical feasibility of the selected remedial method;
- Cost-effectiveness;
- Sustainability;
- Waste management (such as generation of hazardous and not hazardous wastes); and
- Nuisance issues on-site and within the surrounding area (noise, air quality and impacts on land environments).

The primary objectives to address the identified risks were as follows:

- Ensure that following implementation of this strategy the site is rendered 'suitable for use' under the planning regime for the proposed / permitted end use. This must be to the approval of the local planning authority and other key stakeholders (such as the Environment Agency);
- Ensure that minimal residual liability both environmentally and financially remains, and that following remediation, the site will not be classified as contaminated land under the statutory definition (Category 1 and 2) under Part 2A of the Environment Act 1995; and
- Ensure that the proposed remedial solution can be readily accommodated in the development/ build programme and provide the most cost-effective, sustainable and durable solution, where practicable.

SELECTION OF CONTRACTORS

The Client is responsible for ensuring those commissioned to implement the various measures set out in this strategy are competent to do so and have the correct type and level of insurance suitable for the specific task. Where required by any regulations, laws or other such legislative controls, suitably licenced and approved specialists should be used (i.e. licenced waste carriers).

The remediation works set out herein are expected to be co-ordinated by a suitably qualified contractor who will hold all necessary environmental permits, licenses, insurances and implement any necessary Duty of Care to ensure the works are carried out diligently and to safeguard against any potential pollution incidents. Those undertaking any skilled trades as part of the implementation of this strategy, such as installing a gas or VOC barrier membrane for example, should be suitably trained, competent and hold any appropriate qualifications. As part of the verification process contractors will be required to provide evidence of this. Any contractors appointed by the Client will need to provide any relevant documentation prior to works commencing for inclusion in the Verification Report.

The remediation contractor/ demolition contractor and Client will also be responsible for ensuring that any waste generated by the remediation/construction works is properly segregated, treated, transported and disposed of using licensed contractors and at licensed waste disposal facilities (such as a landfill or treatment centre). A copy of any licenses should be obtained and kept on record, with the license number validated on the Environment Agency website (if regulated by the Environment Agency).

APPENDIX D: Backfill Specification

Backfill Specification For Suboils And Topsoils - Private Gardens

Determinand	Units	Residential End Use
Asbestos Screen	-	Absent
Total Cyanide	mg/kg	53.00
Arsenic	mg/kg	37.00
Cadmium	mg/kg	26.00
Chromium	mg/kg	910.00
Copper	mg/kg	2400.00
Lead	mg/kg	200.00
Mercury	mg/kg	170.00
Nickel	mg/kg	130.00
Selenium	mg/kg	250.00
Zinc	mg/kg	3700.00
Naphthalene	mg/kg	2.30
Acenaphthylene	mg/kg	170.00
Acenaphthene	mg/kg	210.00
Fluorene	mg/kg	170.00
Phenanthrene	mg/kg	95.00
Anthracene	mg/kg	2400.00
Fluoranthene	mg/kg	280.00
Pyrene	mg/kg	620.00
Benzo(a)anthracene	mg/kg	7.20
Chrysene	mg/kg	15.00
Benzo(b)fluoranthene	mg/kg	2.60
Benzo(k)fluoranthene	mg/kg	77.00
Benzo(a)pyrene	mg/kg	5.00
Indeno(1,2,3-cd)pyrene	mg/kg	27.00
Di-benzo(a,h)anthracene	mg/kg	0.24
Benzo(ghi)perylene	mg/kg	320.00
TPH CWG - Aliphatic >C5 - C6	mg/kg	42.00
TPH CWG - Aliphatic >C6 - C8	mg/kg	100.00
TPH CWG - Aliphatic >C8 - C10	mg/kg	27.00
TPH CWG - Aliphatic >C10 - C12	mg/kg	130.00
TPH CWG - Aliphatic >C12 - C16	mg/kg	1100.00
TPH CWG - Aliphatic >C16 - C21	mg/kg	32500.00
TPH CWG - Aliphatic >C21 - C34	mg/kg	32500.00
TPH CWG - Aromatic >C5 - C7	mg/kg	70.00
TPH CWG - Aromatic >C7 - C8	mg/kg	130.00
TPH CWG - Aromatic >C8 - C10	mg/kg	34.00
TPH CWG - Aromatic >C10 - C12	mg/kg	74.00
TPH CWG - Aromatic >C12 - C16	mg/kg	140.00
TPH CWG - Aromatic >C16 - C21	mg/kg	260.00
TPH CWG - Aromatic >C21 - C35	mg/kg	1100.00
Benzene	mg/kg	0.87
Toluene	mg/kg	130.00

Determinand	Units	Residential End Use
Ethylbenzene	mg/kg	47.00
m & p-xylene	mg/kg	56.00
o-Xylene	mg/kg	60.00
Monohydric Phenols	mg/kg	120.00

How to Interpret the Backfill Specification: *If asbestos is detected, or concentrations meet or exceed the thresholds set out below, these soils will not be deemed suitable for use in the CCS and should be either returned to the supplier for imported soils or removed from site for site-won soils. Only soils which record concentrations below the thresholds set out below and do not contain asbestos will be considered suitable for use.*

All Units mg/kg
Based on 1.0% SOM in order to be conservative, organic thresholds may increase marginally if SOM >1%.

VISUAL SPECIFICATION

These soils must be clean with no significant quantity of putrescible material (incl. wood or paper), which may generate ground gases, and no hazardous materials such as ACM or general waste (such as glass, metals etc.)

Backfill Specification For Suboils And Topsoils – Communal Open Space

Determinand	Units	Communal Open Space
Asbestos Screen	-	Absent
Total Cyanide	mg/kg	53
Arsenic	mg/kg	79
Cadmium	mg/kg	120
Chromium	mg/kg	1500
Copper	mg/kg	12000
Lead	mg/kg	630
Mercury	mg/kg	170
Nickel	mg/kg	230
Selenium	mg/kg	1100
Zinc	mg/kg	81000
Naphthalene	mg/kg	4900
Acenaphthylene	mg/kg	15000
Acenaphthene	mg/kg	15000
Fluorene	mg/kg	9900
Phenanthrene	mg/kg	3100
Anthracene	mg/kg	74000
Fluoranthene	mg/kg	3100
Pyrene	mg/kg	7400
Benzo(a)anthracene	mg/kg	29
Chrysene	mg/kg	57
Benzo(b)fluoranthene	mg/kg	7.10

Determinand	Units	Communal Open Space
Benzo(k)fluoranthene	mg/kg	190
Benzo(a)pyrene	mg/kg	5.70
Indeno(1,2,3-cd)pyrene	mg/kg	82
Di-benzo(a,h)anthracene	mg/kg	0.57
Benzo(ghi)perylene	mg/kg	640
TPH CWG - Aliphatic >C5 - C6	mg/kg	570000
TPH CWG - Aliphatic >C6 - C8	mg/kg	600000
TPH CWG - Aliphatic >C8 - C10	mg/kg	13000
TPH CWG - Aliphatic >C10 - C12	mg/kg	13000
TPH CWG - Aliphatic >C12 - C16	mg/kg	13000
TPH CWG - Aliphatic >C16 - C21	mg/kg	125000
TPH CWG - Aliphatic >C21 - C34	mg/kg	125000
TPH CWG - Aromatic >C5 - C7	mg/kg	56000
TPH CWG - Aromatic >C7 - C8	mg/kg	56000
TPH CWG - Aromatic >C8 - C10	mg/kg	5000
TPH CWG - Aromatic >C10 - C12	mg/kg	5000
TPH CWG - Aromatic >C12 - C16	mg/kg	5100
TPH CWG - Aromatic >C16 - C21	mg/kg	3800
TPH CWG - Aromatic >C21 - C35	mg/kg	3800
Benzene	mg/kg	72
Toluene	mg/kg	56000
Ethylbenzene	mg/kg	24000
m & p-xylene	mg/kg	41000
o-Xylene	mg/kg	41000
Monohydric Phenols	mg/kg	440

How to Interpret the Backfill Specification: *If asbestos is detected, or concentrations meet or exceed the thresholds set out below, these soils will not be deemed suitable for use in the CCS and should be either returned to the supplier for imported soils or removed from site for site-won soils. Only soils which record concentrations below the thresholds set out below and do not contain asbestos will be considered suitable for use.*

All Units mg/kg
Based on 1.0% SOM in order to be conservative, organic thresholds may increase marginally if SOM >1%.

VISUAL SPECIFICATION

These soils must be clean with no significant quantity of putrescible material (incl. wood or paper), which may generate ground gases, and no hazardous materials such as ACM or general waste (such as glass, metals etc.)

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