

**MEMORANDUM**

To : **SIMON WITHERS/CHARLOTTE ATKINS - DEVELOPMENT CONTROL**

From : **NICK JAMES SENIOR TECHNICAL OFFICER (AIR, LAND AND WATER))**

Tel : **01432 261684** My Ref : **NJ/MBP2/S/112052/F**

Date : **22nd March 2012** Your Ref :

S/112052/F – MERTON WORKS, CANAL STREET, HERFORD. HR1 2EA. DEMOLITION OF EXISTING WAREHOUSE AND ANNEX BUILDINGS, CONVERSION OF EXISTING EDWARDIAN DWELLING INTO TWO HOUSES AND THE BUILDING OF AN ADDITIONAL THREE, TWO BEDROOM AND ONE THREE BEDROOM TERRACE HOUSES.

“PRELIMINARY INVESTIGATION REPORT OF THE MERTON WORKS, CANAL ROAD, HEREFORD.” UNDERTAKEN BY ENVIRONMENTAL MANAGEMENT SOLUTIONS (EMS) (REF:EMS/3216B DATED JANUARY 2012)

I refer to the above report and would make the following comments in relation to contaminated land issues which will require further attention from the applicant/client.

The preliminary investigation of the Merton Works site included the installation/excavation of five boreholes/hand dug pits to assess any risk to future residents. Potential risks had been identified in a previous desk study of the site. Analysis of samples obtained during the works have found Polyaromatic Hydrocarbon (PAH) contamination above recommended guideline values in areas to the north and south east of the site. Buried and surface asbestos fragments were found in the north east, near to two fuel tanks. The report has concluded that additional assessment is required to address remaining uncertainty at the site and I would make the following comments which may be addressed during supplementary investigation of the site.

1. PAH impacted soils have been identified at BH3, and to a lesser extent at BH1. The report has recommended that the risk from this may be mitigated by way of site scrape and importation of soil. I would advise that, should this approach be adopted, samples should be obtained following the scrape and prior to the importation of clean soil to ensure PAH contamination has been suitably delineated and removed through scraping. I would also add, as importation of soil is recommended, we would require that:
 - the imported soil is sampled to ensure it is suitable for use,
 - the source of the imported soil is thoroughly investigated to identify appropriate determinants to be analysed to ensure that soil is suitable i.e. a desk study of the previous uses of land where the soil originates, and likely contaminants associated with it,
 - there is a system in place to ensure the imported material is the same as the material sampled at source,

- where there is no adequate history of the soil, the sampling suite should include heavy metals, pH, speciated PAH and asbestos screen, plus any other substances that may be suspected.

The depth of clean cover proposed should also be suitably justified to demonstrate its suitability at this development.

2. Buried asbestos was found in BH2 and on the surface surrounding the oil tanks. The report advises that this requires further delineation and removal and validation of this will be required in due course. Due to the presence of asbestos in this borehole, analyses for hydrocarbon impact was not undertaken and as such potential impact from leakage from the tanks is unclear. However, this may be addressed following the delineation and asbestos removal exercise recommended.
3. It has been noted within the report that the site investigation was limited to those areas accessible at the time. As such there remain uncertainties in other areas. For example, potential contamination below the steel fuel tank which has been noted as being in poor condition or below building footprints to the east of the site. These uncertainties should be addressed during the further investigation anticipated at the site.

With the above points in mind, I look forward to receiving the results of additional investigation in due course.

I can confirm that, at this stage, I am unable to recommend discharge of contaminated land conditions until such time as further information has been provided by the applicant.

I would be grateful if this information could be forwarded to the applicant/client for their attention.



NICK JAMES