

- Aromatic TPH C21-C35 to represent heavier PAH compounds such as indeno(1,2,3-cd)pyrene.

### 2.1.2 Groundwater

The 2020 Nicholls-Colston factual report gives details of the groundwater sample analyses from seven monitoring wells from the sampling rounds undertaken on the 12th and 28th of October and 2nd November 2020. A summary of concentrations that exceed the EQS and/or DWS are presented in Table 2 below and showed little in the way of significant water quality standard (WQS) exceedances.

**Table 2:** Groundwater concentration data from October and November 2020 sampling rounds compared to WQS

Contaminant of Concern	EQS µg/l	DWS µg/l	Maximum concentration µg/l	Exceedances/Notes
Copper	1	2000	6 in DCS120 on 28/10/2020	All wells
Benzo (a)pyrene	0.00017	0.01	0.07 BH101 28/10	DCS120 on 12/10 and DCS113 on 2/11. Rest < LoD
Benzo(b) fluoranthene	0.017		0.11 BH101 28/10	DCS117 on 12/10, DCS 120 on 12/10 and DCS113 on 2/11. Rest < LoD.
Benzo(k) fluoranthene	0.017		0.05 BH101 28/10	DCS 120 on 12/10. Rest < LoD.
Benzo (ghi)perylene	0.0082		0.06 BH101 28/10	DCS 120 on 12/10. BH101 on 2/11, DCS113 on 2/11. Rest < LoD.
Fluoranthene	0.0063	-	0.08 BH101 28/10	DCS113, 117 on 12/10, all bhs except DCS112 on 2/11
PAHs (sum of 4: B(b)F, B(k)F, Indeno and Benzo(ghi))	-	0.1	0.27 BH101 28/10	Only 1 exceedance location and event
TPH	-	10 <sup>(1)</sup>	100 in BH101 12/10 – Ali and Aro C21-C35 dominant	DCS112, DCS117 and DCS120 on 12/10, BH101 only on 28/10 and BH101, DCS120, DCS122 and DCS124 on 2/11. Dominant fractions are Ali and Aro C21-C35

(1) Environment Agency (2009), 'Petroleum hydrocarbons in groundwater: supplementary guidance for hydrogeological risk assessment'.

Two other TPH fractions were also detected above 10 µg/l; aromatic C16-C21 and aliphatic C5-C6. The maximum concentration of these fractions is 12.2, with 13.6 µg/l for TPH C5-C6 in DCS112 and DCS122 and 13.9 µg/l of TPH C16-C21 in BH101.

Based on Table 2 of groundwater concentrations the following CoC have been taken forward into the controlled waters risk assessment modelling for potential to impact the groundwater receptors:

- Benzo(a)pyrene; and
- Aromatic TPH C21 - C35.

Despite exceedances of the relevant DWS or EQS the aliphatic hydrocarbons that have not been taken forward into the modelling. Aliphatic hydrocarbons are far less mobile and persistent in the aquatic environment than aromatic hydrocarbons and hence taking forward the aromatic bandings will provide sufficient protection to the groundwater resource.

Based on Table 2 of groundwater concentrations the following CoC have been taken forward into the controlled waters risk assessment modelling for potential to impact the surface water resource:

- Copper;
- Fluoranthene;
- Benzo (ghi) perylene;
- Benzo(a)pyrene;
- Benzo(b)fluoranthene; and
- Benzo(k)fluoranthene.

In summary, generally low concentrations of CoC are detected in groundwater, with the source being in the soil (probably tarmacadam) so it is not considered necessary to simulate a groundwater source at the site. Soil concentrations appear to be causing elevated groundwater concentrations, rather than a separate groundwater source being present.

## 2.2 Sensitive Receptors

Potential receptors include:

- Controlled waters - groundwater within the Head Deposits Secondary A aquifer;
- Controlled waters – groundwater within the Chalk Principal Aquifer; and
- Controlled waters – unnamed surface water drains feeding the Lidsey Rife potentially fed by groundwater 820 m down hydraulic gradient of the site and another unnamed drain askew to the gradient line, 500m away.

The site is located within the groundwater source protection zone of two public supply wells in the Chalk. However, these abstraction wells are beneath at least 70 m of combined London Clay and cohesive Lambeth Group beds according to the cross section on the 1996 BGS geological map of Chichester and Bognor Regis and up hydraulic gradient (in Head Deposits) of the site and a local BGS borehole log. The groundwater within the Chalk is therefore not considered to be a receptor of concern from on-site concentrations and has not been taken forward into the modelling.

No groundwater abstraction well could be drilled within 50 m of the A29 realignment scheme and therefore an appropriate compliance point within groundwater would be 50 m down hydraulic gradient of the soil source.

The nearest surface water body/drain to the soil source at the Fontwell Avenue roundabout is 820 m down hydraulic gradient (there is another drain a little closer but this lies across the flow gradient, 500 m due south of Fontwell Avenue roundabout). A photograph of the feature 500m away is provided below. Therefore, in order to provide a more conservative assessment, a distance of 500 m has been selected for the modelling.

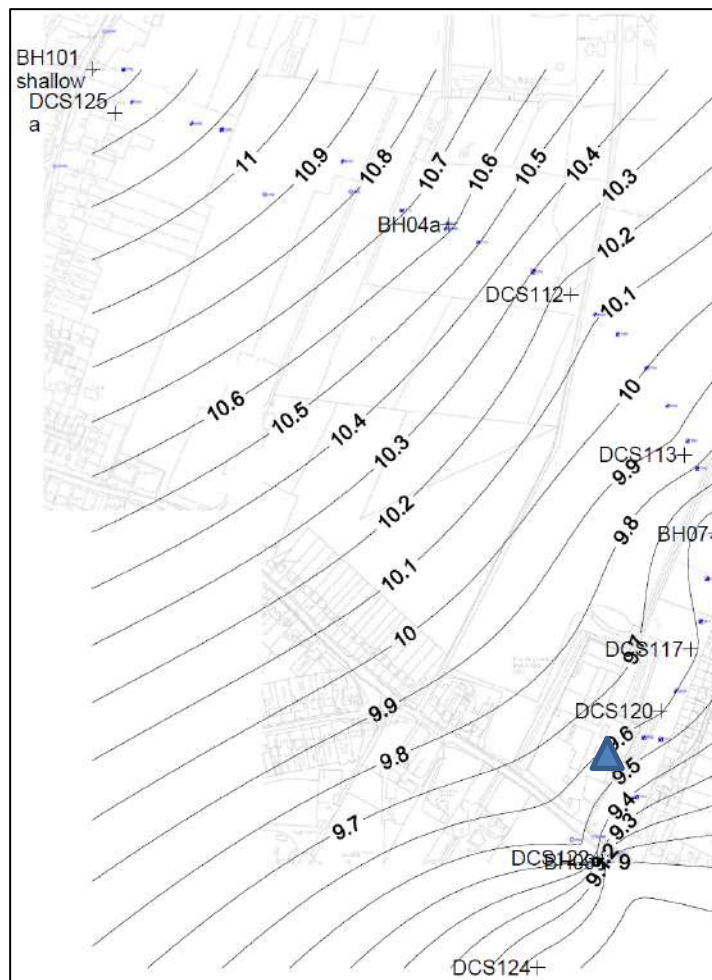


Photo 1 showing unnamed drain located 500m to south of infilled gravel pit

### 2.3 Pathways

The following pathways relating to controlled waters have been identified:

- Leaching from the unsaturated zone followed by vertical and/or horizontal migration of leachable contaminants via the unsaturated zone and then into groundwater within Head Deposits; and
- Migration of contaminated groundwater within the Head Deposits and subsequent interaction with the drains feeding to the Lidsey Rife which may be groundwater fed. Groundwater flow direction is towards the south east as shown in the figure below. This pathway could be enhanced during rainfall events by the action of added discharge from planned soakaways to be built at/near the roundabout.



**Figure 1:** Groundwater flow contours for 28<sup>th</sup> October 2020 (blue triangles mark drains)

Refer Appendix B for selected borehole logs also showing well installations (BH101 and DCS125).

## 3. DQRA Methodology

The controlled waters risk assessment has been conducted in accordance with the risk assessment methodology presented in Environment Agency document “Remedial Targets Methodology; Hydrogeological Risk Assessment for Land Contamination”, 2006 (RTM). The accompanying spreadsheet tool calculates risk based remedial targets for soils and groundwater. At the end of each “tier” of assessment a Site-Specific Target Level (SSTL) is derived. Each additional tier of assessment includes more site-specific data as the model is refined. At the end of each tier of assessment, a decision can be made whether to undertake remedial action at the site in order to achieve the remedial target concentration (SSTL), or to refine the model by conducting further tiers of analysis using more site-specific data.

The Environment Agency Remedial Targets Worksheet v3.1 has been used to simulate SSTLs for soil at the site. A comparison can then be made with post remediation soil concentrations to assess whether on-site concentrations pose a risk to the identified receptors. The model allows vertical migration of contaminants from the soil source to the underlying aquifer and subsequent lateral migration of contaminants to the nearest relevant receptors down hydraulic gradient, in this case:

- a 50 m compliance point in the groundwater of the Head Deposits to be protective of the Secondary A Aquifer; and
- a hypothetical drain compliance point 500 m from the Fontwell Avenue roundabout source to be protective of surface waters.

The worksheet model utilises a series of levels, the functions of which are outlined below:

- **Level 1:** Assesses concentrations of contaminants of concern in soil pore water (leachate). If no leachate data are available, simulated pore water concentrations are calculated utilising soil properties and chemical properties. No dilution or attenuation is assumed in Tier 1.
- **Level 2:** Considers dilution of leachate in a receiving controlled water body; the groundwater beneath the site. The dilution factor is calculated by considering infiltration and aquifer flow beneath the site. No attenuation is assumed.
- **Level 3:** Models the attenuation of contaminants in the aquifer as they migrate from the source area to the receptor and predicts a concentration at the receptor. Attenuation processes of sorption, dispersion and degradation are also modelled and have been assumed in this assessment.

### 3.1 Input Parameters

The parameters required for the assessment can be split into two types; non-contaminant specific and contaminant specific. Non-contaminant specific parameters include hydraulic gradient, hydraulic conductivity, effective porosity, infiltration, bulk density of the soil and aquifer materials, air and water filled porosity for the soil source zone, fraction of organic carbon in the soil and aquifer materials and saturated aquifer thickness. These parameters and their justifications for



the soil source are given in Table 3 for each of the two receptors. Contaminant specific parameters include source dimensions, Henry's Law constant, biodegradation half-life and soil/water partition coefficient. These parameter values and justifications are given in Table 4. Where possible site-specific data have been applied, but in cases where site data are not available appropriate literature values have been used with justification.

A number of the parameters, such as partition coefficients, hydraulic conductivity and half-life have a significant impact on concentrations and time of breakthrough at the receptors as well as SSTLs. Since there are few site-specific data for these particular parameters and only literature data can be used, it is important that a sensitivity analysis is conducted. This will establish whether the analysis and conclusions drawn in the model simulations are robust.

Since there are several priority and priority hazardous substances identified within the list in the previous section, there is a requirement to derive SSTLs at the base of the unsaturated zone prior to entry into groundwater for these substances. Therefore, model simulations using an EQS target concentration to be protective of surface waters will only be conducted to Tier 1 for:

- Benzo(a)pyrene;
- Benzo(b)fluoranthene;
- Benzo(k)fluoranthene;
- Benzo(ghi)perylene; and
- Fluoranthene.

To be protective of the groundwater resource the following CoC will be modelled to the 50 m compliance point receptor as they have exceeded their respective DWS values:

- Chromium;
- Benzo(a)pyrene;
- Aromatic TPH C16 -C21; and
- Aromatic TPH C21-C35.

To be protective of the Lidsey Rife and associated drains at a hypothetical 500 m down hydraulic gradient the following CoC have been modelled using EQS values as the basis for the SSTL derivation:

- Chromium; and
- Copper.

Further details on the input parameters are provided below.

### 3.1.1 *Level 1 Soil Source*

The source material has conservatively been assumed to be a gravelly sand given the descriptions from the borehole logs. This gravelly sand Made Ground contains brick, glass, concrete, macadam, plastic, and metal with some rubber sheeting. The Made Ground extends from the ground surface to the upper surface of the Head Deposits in all investigation locations

for which logs were available. Using the site-specific moisture contents and an assumed bulk density of the gravelly sand it has been possible to obtain values for air and water filled porosities. Total organic carbon values were also taken on site from which it was possible to obtain an estimate of the site-specific fraction of organic carbon value. The data must be taken from the least contaminated samples. The Made Ground has been considered to be of uniform composition in this risk assessment.

### 3.1.2 *Level 2 and 3 Aquifer*

The aquifer in the Level 2 and 3 assessments has been based on the lithological description obtained for natural strata during excavation of the boreholes, which comprise gravelly sand. The depth to the base of the Head Deposits was 10.0 m bgl for BH101 at the site but becomes shallower to the east. A saturated zone thickness in the Head Deposits was approximately 4.5 m since the average depth to groundwater from the surface of the site was around 2.44 m and there was an average depth to the London Clay top surface of 7.2 m.

Data on infiltration is required in Level 2. 922 mm/year of rainfall occurs in the catchment according to the rainfall station at Chichester (National River Flow Archive, 2021) but the Meteorological Office averages for Bognor Regis are 725 mm/year on average (Met Office, 2021). Since the site is likely to be more aligned with Chichester as it is inland a value of 922 mm/year is considered more appropriate. Effective rainfall for the area is quoted as 476 mm/year in Table 1 of the BGS report on the Chalk aquifer of the South Downs (1999). Taking into account the site post development will be 50% hardstanding this effective rainfall equates to  $6.52 \times 10^{-4}$  m/day of infiltration across the site.

The soil source for TPH/PAH is located principally around BH101, DCS125, DCS128 and DCS101. There does not appear to be a significant difference between the source sizes for the PAH and TPH fractions. The areas where the highest concentrations have been found in soil and groundwater will be under the hardstanding of the road which provides a mitigating factor for risk to controlled waters due to reduced infiltration. The metal source sizes are however different with chromium only covering the area around BH101 and DCS128 and copper covering the area around BH101, DCS101 and DCS128.

### 3.1.3 *Level 3 Compliance Points*

The nearest down hydraulic gradient surface watercourse is the drain leading ultimately to the Lidsey Rife which is approximately 820 m southeast of the principal source zone. A hypothetical compliance point of 500 m has been selected to be protective of surface waters. A 50 m compliance point has been selected to assess the risk to the Secondary A Head Deposits aquifer. Only non-priority and priority hazardous CoC were simulated to these distances.

Table 3 presents the proposed physical input parameters for the modelling exercise to derive SSTLs for soils.

**Table 3:** Physical Input Data for Remedial Target Model for Soils

Parameter	Value	Units	Justification
<b>Level 1 Soil</b>			
Water Filled Soil Porosity	0.129	Fraction	P20 porosity calculator used assuming 1.37 - 1.81 g/cm <sup>3</sup> (average bulk density 1.59 g/cm <sup>3</sup> ) and a moisture content of 8.83% on average from on-site sand/gravel materials. Total porosity 47.4 %
Air Filled Soil Porosity	0.345	Fraction	P20 porosity calculator used assuming 1.59 g/cm <sup>3</sup> bulk density and a moisture content of 8.83% on average from on-site materials.
Bulk Density	1.59	g/cm <sup>3</sup>	1.37 to 1.81 g/cm <sup>3</sup> : Gravelly sand - ConSim. BH101, DCS126, DCS127, DCS128 have log descriptions of gravelly sand through to medium sand.
FOC	0.0064	Fraction	Data from 1 unsaturated sample from sand/gravel in TP02 in the Made Ground. Other samples are from a clay matrix and therefore not appropriate.
<b>Level 2 Soil (Dilution in the RTD)</b>			
Infiltration	6.52E-04	m/d	922 mm/year of rainfall occurs in the catchment according to the rainfall station at Chichester ( <a href="https://nrfa.ceh.ac.uk/data/station/spatial/41023">https://nrfa.ceh.ac.uk/data/station/spatial/41023</a> ). MetOffice averages for Bognor Regis give 725 mm/year average ( <a href="https://www.metoffice.gov.uk/research/climate/maps-and-data/uk-climate-averages/gcp8bsvww">https://www.metoffice.gov.uk/research/climate/maps-and-data/uk-climate-averages/gcp8bsvww</a> ). Site likely to be more aligned with Chichester as it is inland. Effective rainfall is quoted as 476 mm/year in Table 1 of <a href="http://nora.nerc.ac.uk/id/eprint/12713/1/SD99001.pdf">http://nora.nerc.ac.uk/id/eprint/12713/1/SD99001.pdf</a> . Taking into account the site post development will be 50% hardstanding this equates 6.52 x 10 <sup>-4</sup> m/day
Length of Contaminant Source	10-20	m	Length of source is contaminant specific. Groundwater flow assumed to be to the east south east. See Table 5.
Saturated Aquifer Thickness	4.48	m	Depth to London Clay recorded in WSP BH01, BH04A, BH06 - BH09, DCS124 at an average depth of 7.17 m bgl. Groundwater strike levels after 20 mins in these boreholes an average of 2.44 m bgl giving an average saturated thickness of 4.48 m
Hydraulic Conductivity	0.5	m/d	Site data average – Nicholls Colton Hvorslev analysis of falling head tests on BH101 and DCS125 give 6.08 x 10 <sup>-6</sup> m/s (BH101 deep) to 2.4 x 10 <sup>-7</sup> m/s (DCS125) which converts to 0.52 m/day and 0.02 m/day. Check via Bouwer and Rice analysis



Parameter	Value	Units	Justification
			reveals similar values giving confidence. Log descriptions in BH101 indicate a coarse sandy gravel in the saturated zone, so as layers of silt are present within the aquifer 0.5 m/day is considered appropriate.
Hydraulic Gradient	0.002	Fraction	Average hydraulic gradient on-site from 28th October 2020 monitoring round data. Data from 2nd and 9th November 2020 supports this value and direction of SE.
Width of Contaminant Source	20-30	m	Contaminant specific - see Table 5. Dimension perpendicular to groundwater flow.
<b>Level 3 Soil</b>			
Bulk Density	2.09	g/cm <sup>3</sup>	Average values taken from samples from Head Deposits in WSP BH07, BH08, TP15 and Nicholls Colton BH101
Effective Porosity	0.15	Fraction	From De Marsily (1986) for a gravelly sand (specific yield)
Distance to Compliance Point	500 and 50	m	Distance from the edge of the soil source zone around BH101 to the drain at the Halo complex - 820 m. Hypothetical compliance point selected at 500 m. 50 m compliance point in Head Deposits Secondary A aquifer.
FOC	0.0028	Fraction	Site specific data for BH09 taken at depths of 2 and 4 m in sand/gravel at 0.26 and 0.30%

### 3.1.4 Contaminant Specific Parameters

The partition coefficient ( $K_d$ ) of organic contaminants has been calculated from the partition coefficient for organic carbon ( $K_{oc}$ ) and fraction of organic carbon ( $F_{oc}$ ). Literature values for  $K_{oc}$  were initially used combined with site-specific values for  $F_{oc}$ .

Aerobic degradation has been assumed for organic compounds since the aquifer and Made Ground is relatively permeable and close to the surface so dissolved oxygen concentrations are likely to be relatively high. Literature values for contaminant half-lives are used. In Level 3 the model allows the option of modelling biodegradation in either the dissolved phase only, or in the dissolved and sorbed phases. Due to the use of literature values of half-lives, the dissolved phase only method of modelling biodegradation has been selected. For contaminants not subject to decay, such as copper, a very large half-life ( $9 \times 10^{99}$  years) has been used. Since the Made Ground and aquifer materials are similar in nature, it is considered appropriate to use the same  $K_d$  values in the Level 1 and Level 3 assessment. The chemical input parameters are presented in Table 4.

To derive site-specific target concentrations UK DWS and EQS freshwater guidelines to be protective of either groundwater or surface water receptors have been used.

Soil source dimensions for each of the contaminants of concern (CoC) have been derived from the on-site concentrations and are presented in Table 5.

**Table 4:** Chemical Input Data for P20 Model

Parameter	Value	Units	Justification
<b>Benzo(a)pyrene</b>			
Henry's Law Constant	1.76E-06	-	SC050021/SR7
KOC	128825	ml/g	log Koc = 5.11 from Science Report - SC50021/SR7
Half Life	1060	Days	Half-life in groundwater Howard et al. 1991
<b>Benzo(b) fluoranthene</b>			
Henry's Law Constant	0.00000205	-	SC050021/SR7
KOC	104713	ml/g	log Koc = 5.02 from Science Report - SC50021/SR7
Half Life	1220	Days	Half-life in groundwater
			Howard et al. (1991) Environmental degradation rates
<b>Benzo(k) fluoranthene</b>			
Henry's Law Constant	0.00000174	-	SC050021/SR7
KOC	147911	ml/g	log Koc = 5.17 from Science Report - SC50021/SR7
Half Life	4280	Days	Half-life in groundwater
			Howard et al. (1991) Environmental degradation rates
<b>Fluoranthene</b>			
Henry's Law Constant	0.0000629	-	Science Report – SC050021/SR7
Koc	18197	ml/g	log Koc = 4.26 from Science Report - SC50021/SR7
Half Life	1990	Days	<a href="https://pubchem.ncbi.nlm.nih.gov/compound/9154#section=Environmental-Biodegradation">https://pubchem.ncbi.nlm.nih.gov/compound/9154#section=Environmental-Biodegradation</a> Average of the 3.1 to 7.8 years quoted.
<b>Benzo (ghi) perylene</b>			
Henry's Law Constant	2.36E-06	-	Science Report – SC050021/SR7

Parameter	Value	Units	Justification
Koc	416869	ml/g	log Koc = 5.62 from Science Report - SC50021/SR7
Half Life	1299	Days	Groundwater Chemicals Desk Reference Montgomery 4th ed. 3.23 to 3.56 years given – 3.56 years used as a conservative value.
<b>Indeno(1,2,3-cd) perylene</b>			
Henrys Law Constant	0.00000205	ml/g	Science Report – SC050021/SR7
Koc	87096	ml/g	log Koc = 4.94 from Science Report - SC50021/SR7
Half Life	1.46E+03	days	Howard et al. (1991) Environmental degradation rates
<b>Chromium</b>			
Kd	31622	ml/g	<a href="https://archive.epa.gov/epawaste/hazard/web/pdf/s0524.pdf">https://archive.epa.gov/epawaste/hazard/web/pdf/s0524.pdf</a> . Converted from log Kd of 4.5
Half Life	9.00E+99	days	No biodegradation assumed.
<b>Copper</b>			
Kd	15849	ml/g	<a href="https://archive.epa.gov/epawaste/hazard/web/pdf/s0524.pdf">https://archive.epa.gov/epawaste/hazard/web/pdf/s0524.pdf</a> . Converted from log Kd of 4.2
Half Life	9.00E+99	days	No biodegradation assumed.
<b>TPH C16-C21 Aromatic</b>			
Henrys Law Constant	0.013	-	TPH CWG Vol 5 p8.
KOC	15849	ml/g	TPH CWG log Koc = 4.2
Half Life	3650	Days	New Zealand Guidelines: 1999: Modules. Guidelines for Assessing and Managing Petroleum Hydrocarbon Contaminated Sites in New Zealand. Ministry for the Environment.
<b>TPH C21-C35 Aromatic</b>			
Henrys Law Constant	$6.7 \times 10^{-4}$	-	TPH CWG Vol 5 p8.
KOC	125892	ml/g	TPH CWG Volume 5 p8. Log Koc = 5.1

Parameter	Value	Units	Justification
Half Life	3650	Days	New Zealand Guidelines: 1999: Modules. Guidelines for Assessing and Managing Petroleum Hydrocarbon Contaminated Sites in New Zealand. Ministry for the Environment.

**Table 5:** Soil source sizes

<b>Contaminant</b>	<b>Width (m)</b>	<b>Length (m)</b>	<b>Justification</b>
Cr	10	10	Elevated leachate in BH101 and DCS128 only
Cu	30	20	Elevated leachate in BH101 particularly so area of gravel pit taken for conservatism
TPH aromatic C16-C21	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101
TPH aromatic C21-C35	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101
Fluoranthene	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101
Benzo(b)fluoranthene	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101
Benzo(k)fluoranthene	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101
Benzo(ghi)perylene	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101
Indeno(123-cd)pyrene	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101
Benzo(a)pyrene	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101

## 4. Results

### 4.1 Results for 500 m Compliance Point to be Protective of the Drainage Channel to Lidsey Rife

The results of the remedial targets methodology spreadsheet modelling for the theoretical compliance point 500 m down hydraulic gradient of the source to be protective of the drainage channels ultimately leading to Lidsey Rife are shown in Table 6 below. Appendix A presents the remedial target spreadsheets. Table 6 gives the soil and leachate SSTLs derived using EQS values. The priority and priority hazardous substances are shown in italicised bold font. The tables also indicate if the CoC takes longer than 1000 years to reach the receptor; if it does take longer then it is considered an insignificant risk to the receptor (Environment Agency, 2006). If on-site concentrations were found to be above the SSTL and take less than 1000 years to reach the receptor, the maximum soil value and the boreholes that exceeded that value have been given a bold font and highlighted yellow.

Where exceedances of the soil SSTL has occurred then the SSTLs have only been compared to unsaturated zone samples, i.e. those at depths of < 2.44 m bgl. Soil SSTLs have only been compared to the most recent 2020 data.

**Table 6:** Soil Source Impact on 500 m theoretical drainage channel to be protective of surface waters based on EQS

Contaminant	Water Quality Standard (µg/l)	Reference	Level 1 Soil RT to be protective of drainage channel (mg/kg)	Level 3 Soil RT to be protective of drainage channel (mg/kg)	Maximum soil concentration on site below agreed removal depths (mg/kg)	Level 3 leachate RT to be protective of drainage channel (mg/l)	Time of contaminant breakthrough >1000 years?
Chromium III	4.7	EQS	N/A	2.03E+04	All below SSTL	0.641	Yes, >10,000 years
Copper	1	bioavailable EQS		7.98E+02	All below SSTL	0.0504	Yes, >10,000 years
<b><i>Benzo(a)pyrene</i></b>	0.00017	EQS	1.40E-04	N/A	BH101 2m, DSC101 1.5 m, DCS104, DCS125 0.5, DCS128 2m	N/A	N/A
<b><i>Benzo(b)fluoranthene</i></b>	0.017	EQS	1.14E-02			N/A	N/A
<b><i>Benzo(k)fluoranthene</i></b>	0.017	EQS	1.61E-02			N/A	N/A
<b><i>Benzo(ghi)perylene</i></b>	0.0082		2.19E-02			N/A	N/A
<b><i>Fluoranthene</i></b>	0.0063	EQS	7.34E-04			N/A	N/A

All leachate concentrations were found to be below their relevant SSTLs. Soil SSTLs to be protective of the surface water receptor were exceeded by on-site concentrations of PAHs. This is because the PAHs are priority/priority hazardous substances and as such cannot be allowed to enter controlled waters. They have therefore only been modelled to the base of the unsaturated zone. They have, however, already been detected in groundwater.



Due to the high partition coefficient for the PAHs it takes much longer than 1000 years to reach the theoretical surface water receptor, taking over 10,000 years. Benzo(a)pyrene takes >10,000 years and fluoranthene takes 1650 years to reach the receptor, which is a significant length of time and hence it is highly unlikely that there will be any significant impact to the receptor. So, whilst the DQRA cannot simulate these PAH concentrations in soils to the receptor, it is known that they are unlikely to significantly impact the Lidsey Rife and associated drainage channels.

Benzo(a)pyrene is a priority hazardous substance and hence only a Tier 1 SSTL should be derived. The SSTL to be protective of the surface waters down gradient of the site is extremely low at  $1.4 \times 10^{-4}$  mg/kg and is far below natural background concentrations in an urban environment of 3.6 mg/kg (Defra, 2012). Maximum soil concentrations are below this normal background concentration where remediation is not planned. It would be impractical to have a SSTL of  $1.87 \times 10^{-4}$  mg/kg for the site and it is suggested that the background concentration should be used.

Due to the low EQS values for fluoranthene the Tier 1 SSTL is also very low. It is recognised that the Tier 1 SSTL for fluoranthene at  $7.3 \times 10^{-4}$  mg/kg would be an impractical target concentration since it is below achievable laboratory method detection limits. Normal background concentrations of other PAHs in soils were not defined by Defra during the 2012 series of reports. The Environment Agency (2007) completed a large study of PAH concentrations in rural, urban, and industrial soils which found that fluoranthene concentrations rural soils were on average 0.216 mg/kg and in urban areas were 5.28 mg/kg.

Similarly, concentrations of benzo(b)fluoranthene in rural and urban settings are 0.188 mg/kg and 1.66 mg/kg respectively. Concentrations of benzo(k)fluoranthene in rural and urban settings are 0.0852 mg/kg and 1.26 mg/kg respectively. Concentrations of benzo(ghi)perylene rural and urban settings are 0.854 mg/kg and 0.109 mg/kg respectively. Therefore, consideration should be given as to adopting these urban values up to 50 m from the A29 rather than the SSTL value which are impractical target concentrations as they are below or almost at the limit of detection.

## 4.2 Head Deposits 50 m Compliance Point Results

The results of the remedial targets methodology spreadsheet modelling for the Head Deposits Secondary A aquifer receptor are shown in Table 7 below. Table 7 gives the soil and leachate SSTLs derived using DWS values. The hazardous substances are shown in italicised bold font. The tables also indicate if the CoC takes longer than 1000 years to reach the receptor; if it does take longer, then it is considered to pose an insignificant risk to the receptor. If on-site concentrations were found to be above the SSTL and take less than 1000 years to reach the receptor (Environment Agency, 2006), the maximum recorded value and the boreholes that exceeded that value have been given a bold font.

**Table 7:** Soil Source Impact 50 m compliance point based on DWS

Contaminant	Water Quality Standard (µg/l)	Reference	Level 1 or 3 Soil RT to be protective of Head Deposits aquifer (mg/kg)	Maximum soil concentration on site below agreed removal depths (mg/kg)	Level 3 Leachate RT to be protective of Head Deposits aquifer (mg/l)	Time of contaminant breakthrough >1000 years?
Chromium	50	DWS	5.37E+03 (Level 3)	All below SSTL	0.170	Yes, >10,000 years
Benzo(a)pyrene	0.01	DWS	8.25E-03 (Level 1)	DSC101 1.5 m, DCS104, DCS125 0.5, DCS128 2m	N/A	N/A
Aromatic C16-C21	10	withdrawn private DWS	2.10E+00 (Level 3)	DCS125 0.5, DCS128 2m above LoD (10 mg/kg)	0.0207	No, 770 years
Aromatic C21-C35	10	withdrawn private DWS	3.18E+02 (Level 3)	All below SSTL	0.0207	No, 770 years

From Table 7 only benzo(a)pyrene and TPH Aromatic C16-C21 were found to pose a risk to the groundwater receptor from soil concentrations. As discussed in the previous section benzo(a)pyrene is a hazardous substance and as such cannot be allowed to enter controlled waters. It has therefore only been modelled to the base of the unsaturated zone. Benzo(a)pyrene has, however, already been detected in groundwater. Once within groundwater, due to the high partition coefficient it takes much longer than 1000 years to reach the compliance point, taking over 10,000 years. Therefore, there is considered to be an insignificant risk from this CoC to the Head Deposits compliance point receptor.

Benzo(a)pyrene is a hazardous substance with respect to groundwater and hence only a Tier 1 SSTL should be derived. The SSTL to be protective of the surface waters down gradient of the site is low at  $8.3 \times 10^{-3}$  mg/kg and is far below natural background concentrations in an urban environment of 3.6 mg/kg (Defra, 2012). Maximum soil concentrations are below this normal background concentration where remediation is not planned. It would be impractical to have a SSTL of  $8.3 \times 10^{-3}$  mg/kg for the site and it is suggested that the background concentration should be used instead.

Although there are exceedances of the TPH Aromatic C16-C21 soil SSTL at the site, the time that this CoC takes to reach a 50 m compliance point is 770 years and therefore a significant length of time, indicating that there is little risk to the overall groundwater resource from the concentrations that are to remain at the site.

Chromium has not been treated as a hazardous substance as no chromium VI was detected in the soils on site and has therefore been modelled to Tier 3. From Table 7 only one leachate sample for chromium exceeded the leachate SSTL in DCS128 at 1 m depth and no soil samples exceeded the soil SSTL.

### 4.3 Sensitivity Analysis

A sensitivity analysis has been conducted for two CoC to assess whether the derived SSTLS are robust. The two selected COC have their maximum on-site soil concentrations above the derived SSTL. Site-specific data are available for some parameters, and some data have been derived from literature; both data types having uncertainty associated with them due to variability of ground conditions across the site as well the array of literature values. A number of the parameters such as half-life, hydraulic conductivity and partition coefficients have a significant impact on remedial target values and the time taken to the receptors. The two CoC that have been selected to assess the impact of the parameter variation on the risk to the receptors are:

- Benzo(a)pyrene for soil remedial targets to be protective of the surface water receptors at a 500 m compliance point; and
- TPH Aromatic C16 – C21 for soil remedial targets to be protective of the Head Deposits aquifer at a 50 m compliance point.

The range in partition coefficients for benzo(a)pyrene was obtained from the ATSDR toxicological profile (date unknown) (log Koc = 6.74) as well as MacKay et al. (2006) (range of log Koc from 4.49 to 6.49 for most closely matching sediment types) and Montgomery (2007) (log Koc from 5.53 to 8.25). The final range selected has therefore been from log Koc of 4.49 to 6.74.

Henry’s Law constants for benzo(a)pyrene come from Montgomery (2007) as  $2.71 \times 10^{-7}$  atm-m<sup>3</sup>/mol which converts to  $9.34 \times 10^{-6}$  dimensionless using the USEPA converter (USEPA, 2016).  $0.0079$  Pa-m<sup>3</sup>/mol ( $7.8 \times 10^{-8}$  atm-m<sup>3</sup>/mol) was obtained from MacKay et al. (2006) at 10 degrees which converts to a dimensionless value of  $3.35 \times 10^{-6}$ .

Bulk densities and water filled porosities do not have any significant impact over the plausible range and so these parameters have not been included in the sensitivity analysis.

The results of the sensitivity analysis are shown in Table 8 for benzo(a)pyrene.

**Table 8:** Sensitivity Analysis Results for benzo(a)pyrene for Level 1 Soil Remedial Target for surface water receptor.

Parameter	Value	Level 1 soil remedial target for RTD DWS (mg/kg)	Maximum on site concentrations after removal of material from areas A, B and C (mg/kg)
Partition Coefficient (ml/g)	Log Koc = 6.74	3.98E-03	8 mg/kg in DCS128 at 2m depth
	Log Koc = 5.11	1.40E-04	
	Log Koc = 4.49	3.36E-05	
Henry’s Law coefficient	$9.34 \times 10^{-6}$	1.40E-04	
	$3.35 \times 10^{-6}$	1.40E-04	
	$1.76 \times 10^{-6}$	1.40E-04	

Table 8 shows that there is no impact on the Level 1 SSTL for variations in Henry’s Law coefficient. When examining the upper end of plausible partition coefficients the SSTL does increase, as expected, although does not rise about the limit of detection in the laboratory and

hence the overall conclusion for benzo(a)pyrene and hence the PAHs as a whole at Tier 1 does not change and the analysis remains robust. As discussed in the previous section it would be more appropriate for the benzo(a)pyrene SSTL to be set at background levels for an urban environment in the vicinity of the roundabout (within 50 m of the A29), so 3.6 mg/kg. This would result in just one sample from the site exceeding this value outside of the intended remediation area at 2 m depth in the area of DCS128.

Results of the sensitivity analysis for TPH Aromatic C16-C21 are presented in Table 9. The variation in hydraulic conductivity is based on the range of possible values from MacDonald et al. (2012) for a sandy gravel aquifer with silts to support the borehole log descriptions, as well as the range of site-specific data from the falling head tests. However as noted in MacDonald et al. (2012) the bulk descriptors “sand”, “silt” and “gravel” have little predictive power in helping to quantify the permeability of unconsolidated heterogeneous sediments. A range from 5 m/day to 0.05 m/day has therefore been selected.

The range in partition coefficients for TPH Aromatic C16-C21 have come from the surrogates of fluoranthene (C16) to benzo(k)fluoranthene (C20) which were initially from a log Koc of 4.26 to 5.17 respectively (Environment Agency, 2008). Further data have been obtained from MacKay et al. (2006) which gives a range of log Koc from 5.91 to 7 for benzo(k)fluoranthene and a range of log Koc of 4.6 to 6.7 for fluoranthene. The final range selected has therefore been from 4.2 to 6.7.

The value for the Henry's Law constant for TPH Aromatic C16-C21 of 0.013 came from TPH CWG (1999). Further data have been obtained from Montgomery (2007) as  $2.71 \times 10^{-7}$  atm-m<sup>3</sup>/mol which converts to  $9.34 \times 10^{-6}$  dimensionless using the USEPA converter (USEPA, 2016) for benzo(k) fluoranthene and a range of 2.57 to  $5.53 \times 10^{-6}$  atm-m<sup>3</sup>/mol at 10°C for fluoranthene which convert to a range of  $1.11 \times 10^{-4}$  to  $2.38 \times 10^{-4}$ . The final range selected has therefore been from dimensionless values of 0.013 to  $9.34 \times 10^{-6}$  with a midpoint as  $1.11 \times 10^{-4}$ .

Half-lives for TPH Aromatic C16-C21 come from Howard et al. (1991) as a maximum value of 3.34 years in groundwater for fluoranthene and 11.7 years for benzo(b)fluoranthene. These two values have been used in the sensitivity analysis.

The range of hydraulic gradients comes from an analysis of the infiltration areas and predicted maximum flows. There are two areas of infiltration; one within the roundabout (infiltration area 1A-just south of yellow shaded area on Dwg A29-CAP-HGT00-DR-GR-0227 P01 and one just south of the roundabout (infiltration area -close to green shaded area on above mentioned drawing). Infiltration volumes have been based on a 1 in 100 year storm event lasting 4 hours with an addition of 40% to take into account climate change variation. The data for the infiltration areas are as follows:

	Area of base of tank (m <sup>2</sup> )	Vol. (m <sup>3</sup> )	Rainfall event duration
Infiltration tank 1A	12 x 12 = 144	74.9	240 mins
Infiltration tank 1B	47 x 5.5 = 259	172.6	240 mins

The equivalent daily discharge rate would therefore be 449 m<sup>3</sup>/day for tank 1A and 1036 m<sup>3</sup>/day for tank 1B, or an infiltration of 0.52 m for tank 1A and 0.67 m for tank 1B over a duration of 4 hours.

Making some very broad assumptions that the aquifer is unconfined, homogeneous, groundwater level is at the base of the tanks and steady state flow occurs, the Dupuit formula for unconfined flow can be used to estimate the size of the cone of influence that would occur from these infiltration values.

$$Q = \pi K \frac{h_2^2 - h_1^2}{\ln\left(\frac{r_2}{r_1}\right)}$$

Q is the injection rate in m<sup>3</sup>/day, K is the hydraulic conductivity in m/day and h and r are the heads and radii from the “well” at two distances with the second being further away than the first. If we assume that the saturated aquifer thickness is 4.48 m and that it is increased to 4.48+0.52m for tank 1A at its outer edge (6 m from the centre) and 4.48+0.67 m for tank 1B and that an insignificant impact is considered to be +/- 0.02 m change in groundwater level, with a K value of 0.5 m/day and a discharge rate of 449 x 6 m<sup>3</sup>/day (to obtain 24 hour equivalent) or 1036 x 6 m<sup>3</sup>/day then the sphere of influence is in fact very small and less than 1 m from the infiltration tank where hydraulic gradients will be altered. This gives reassurance that hydraulic gradients along the modelled path of 50 m will not be significantly affected during a storm event due to the tanks alone. Therefore, a range of hydraulic gradients have been used from 0.002 (calculated across the site from October 2020 data) increased to a maximum of 0.005.

However, infiltration may well increase because of climate change and hence a range of infiltration rates have been applied using the UKCP18 scenarios. Winter precipitation may increase by up to 40% in south-east England and summer precipitation may increase by approximately 14%. Annually this may be reflected as a 27% increase. The infiltration has therefore been increased by factors of 1.14 and 1.27 in the sensitivity analysis.

Table 9 indicates that for plausible ranges of half-lives, Henry’s Law constants, infiltration amended to reflect injection rates, hydraulic gradients, and site-specific hydraulic conductivity values there is no significant change to the value of the SSTL.

On examination of the partition coefficient it would appear that this parameter does have a significant effect on the SSTL value. It has not been possible to obtain site-specific data for partition coefficients for TPH as it was not considered appropriate to analyse for leachate for these compounds. However, leachate analyses were conducted for PAHs for a number of samples, with DCS125 having detections in both soil and leachate samples. Partition coefficients were calculated for those determinands with detections in DCS125 resulting in values between 1166 ml/g for acenaphthene to 17,692 ml/g for phenanthrene. It was not considered appropriate to calculate partition coefficients for those samples which had leachate concentrations below the limit of detection since it is not known how far below the limit of detection the true value would be, potentially giving a falsely high value and so the more conservative option has been selected. As literature partition coefficients for acenaphthene and phenanthrene vary from log K<sub>oc</sub> of 1.25 to 5.87 and log K<sub>oc</sub> 3.6 to 6.9 (Montgomery, 2007) respectively it would appear the site-specific values are in the mid-range of literature quoted.

This indicates that a mid-range partition coefficient for TPH Aromatic C16-C21 is more appropriate giving an SSTL of 41.9 mg/kg. The areas that have been highlighted for removal of material have concentrations above this SSTL, whereas all other remaining locations have

sample concentrations that would fall below this SSTL value. This gives confidence in the proposed strategy for removal of materials at the site.

Referring back to Table 8 and the analysis of the partition coefficients in the above paragraph that a mid-range value is appropriate, the SSTL of  $1.4 \times 10^{-4}$  mg/kg for benzo(a)pyrene is also robust. However, as previously mentioned the SSTL for the site cannot be lower than the laboratory limit of detection and hence a background value of 3.6 mg/kg is more appropriate for the site.

**Table 9:** Sensitivity Analysis Results for TPH Aromatic C16-C21 for Level 3 Soil Remedial Target for Head Deposits.

Parameter	Value	Level 3 groundwater remedial target for RTD DWS (mg/kg)	Maximum on site concentration after removal of areas A, B and C (mg/kg)
Partition Coefficient (ml/g)	Log Koc = 4.2	2.10	32 in DCS128 at 2 m depth
	Log Koc = 5.5	41.9	
	Log Koc = 6.70	664	
K (m/day)	5	4.75	
	0.5	2.10	
	0.05	1.79	
Henry's Law constant (dimension-less)	0.013	2.10	
	0.00011	2.10	
	$9.34 \times 10^{-6}$	2.10	
Infiltration (m/day)	$6.52 \times 10^{-4}$	2.10	
	$7.43 \times 10^{-4}$	1.97	
	$8.28 \times 10^{-4}$	1.88	
Hydraulic gradients	0.005	2.64	
	0.002	2.10	
	0.001	1.93	
Half-life (days)	4273	2.00	
	3650	2.10	
	1220	3.98	

It can be seen that the modelling is robust for TPH Aromatic C16-C21 chemicals and certain soil samples have been correctly identified as exceeding their relevant SSTL values.

At this point it was seen that taking the mid-range partition coefficients for PAHs was a sensible approach to make sure that the SSTLs will be protective of surface water. Table 10 gives the outcome of this re-analysis.



**Table 10:** Revised PAH SSTLs for surface water compliance point based on mid-range Koc values.

CoC	EQS	Koc Used (ml/g)	Original SSTL	Log Koc Range (Midpoint of range) ml/g	Revised SSTL (mg/kg)
Benzo(a)pyrene	0.00017	Log Koc = 5.11	1.40E-04	4.49 – 6.74 (5.61)	4.43E-04
Benzo(b)fluoranthene	0.017	Log Koc = 5.02	1.14E-02	4.26 to 5.17 (4.72)	5.71E-03
Benzo(k)fluoranthene	0.017	Log Koc = 5.07	1.61E-02	5.97 – 6.94 (6.45)	0.307
Benzo(ghi)perylene	0.0082	Log Koc = 5.62	2.19E-02	5.43 – 8.91 (7.17)	1.61
Fluoranthene	0.0063	Log Koc = 4.26	7.34E-04	4.6 – 6.7 (5.6)	0.0161

#### Significance of comparing Table 9 and Table 10 SSTL's with GI findings

Soil concentrations at five locations exceed the SSTLs for PAHs. On site concentrations of TPH Aromatic C16-C21 were also found to exceed the SSTL in two locations.

Many of the detected benzo(a)pyrene concentrations are in line with concentrations expected within an urban environment as background concentrations (3.6 mg/kg, Defra (2012)). Analysis of background concentrations of fluoranthene and the other PAHs in soils in the UK has not been completed in the same way completed by Defra for benzo(a)pyrene, but a similar study was conducted by the Environment Agency (2007). The Environment Agency study (2007) indicates that from all sources of PAHs fluoranthene (average concentration in England of 0.216 mg/kg in rural and 5.28 mg/kg in urban settings) and pyrene were the dominant PAH species within soils, being approximately three times as abundant as benzo(a)pyrene.

The Environment Agency (2007) data indicates background concentrations of benzo(b)fluoranthene in urban settings are 1.66 mg/kg, benzo(k)fluoranthene is 1.26 mg/kg, benzo(ghi)perylene 0.854 mg/kg respectively. Therefore, consideration should be given as to adopting the urban values within 50 m of the A29 rather than the SSTL value which are impractical target concentrations as they are below or almost at the limit of detection. This is summarised in Table 11.

The sensitivity analysis has shown that the PAH SSTLs to be very sensitive to the variation in possible partition coefficients. Initial partition coefficients were selected from the Environment Agency SR7 dataset to be consistent, but further review of the site data allowed a few site-specific partition coefficients to be calculated for PAHs. This revealed that values were likely to be more

in the mid-range of literature values and hence the PAH SSTLs were re-derived. Table 11 presents the SSTLs derived for those CoC which had exceedances on site and suggests possible overall soil and leachate remedial targets for the site and this table brings in earlier SSTL's for copper and chromium. The lower of the EQS or DWS derived SSTL has been selected if practical. However, in some cases the SSTL is much lower than laboratory detection limits and where natural background concentrations of PAHs are higher in soils than the derived SSTLs these have been replaced with natural background levels. The SSTLs in Table 11 should only be applied to areas within 50 m of the A29 and in the vicinity of the Fontwell Avenue roundabout. Should SSTLs be required for other parts of the realignment then values will need to be calculated separately to those in this report.

**Table 11:** Combined SSTL table with suggested remedial targets for the site.

CoC	Soil SSTL for Surface Water Compliance Point mg/kg	Soil SSTL for Head Deposits Compliance Point mg/kg	Suggested Combined Soil SSTL mg/kg	Leachate SSTL for Surface Water Compliance Point mg/l	Leachate SSTL for Head Deposits Compliance Point mg/l	Suggested Combined Leachate SSTL mg/l
Chromium - total	20300	5370	5370	0.641	0.170	0.170
Copper	798	ND	798	0.0504	ND	0.0504
<i>Benzo(a)pyrene</i>	$4.43 \times 10^{-4}$	0.0261	3.60 (NBC)	ND	ND	ND
<i>Benzo(b)fluoranthene</i>	$5.71 \times 10^{-3}$	ND	1.66 (NBC)	ND	ND	ND
<i>Benzo(k)fluoranthene</i>	0.307	ND	1.26 (NBC)	ND	ND	ND
<i>Benzo(ghi) perylene</i>	1.61	ND	1.61	ND	ND	ND
<i>Fluoranthene</i>	0.0161	ND	5.28 (NBC)	ND	ND	ND
TPH C16-C121 Aromatic	ND	41.9	41.9	ND	0.0207	0.0207
TPH C21-C35 Aromatic	ND	318	318	ND	0.0207	0.0207

ND – SSTL not derived as no relevant water quality standard or that CoC not an issue for that particular source or standard or for leachate the SSTL is the same as the EQS.

NBC – natural background concentration (Defra, 2012) and standardly found concentrations in rural soils (Environment Agency, 2007)

## 5. Summary and Conclusions

This DQRA has been conducted in order to quantify the risk posed to controlled waters receptors from the soil concentrations identified at the Fontwell Avenue roundabout site post remediation, and to derive site specific target levels to inform any further assessment. The most significant areas of contamination in soils were linked to the site as a former gravel pit which had been filled. This report has quantified the extent of the potential risk to controlled waters receptors, both groundwater and surface water, from the soil concentrations identified on site after the 2020 site investigation by deriving site-specific target levels.

The hydrogeological conceptual model of the site identified two key receptors; the drains leading to the Lidsey Rife 820 m to the south and east of the site and the Head Deposits Secondary A aquifer. Compliance points were selected for the surface water receptor and also for the Head Deposits aquifer at 500 m and 50 m respectively. The metal and organic contamination identified in soil would leach into the unsaturated zone, pass vertically downwards to the groundwater approximately 2.4 m below ground level and then migrate down hydraulic gradient to the southeast towards the drains.

The remedial target methodology spreadsheet model was used to quantify the risk to the Secondary A Head Deposits aquifer and the drains leading to the Lidsey Rife. The metal CoCs and TPH Aromatic C21-C35 identified in elevated concentrations in the soil have proved to pose an insignificant risk to these two receptors. Five priority hazardous CoCs (benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(ghi)perylene and fluoranthene) in soils were found to exceed their SSTLs at the base of the unsaturated zone below the proposed remediation levels when considering risk to controlled waters.

The sensitivity analysis showed that the PAH SSTLs were very sensitive to the variation in possible partition coefficients. Analysis of site-specific data for partition coefficients revealed that values were likely to be more in the mid-range of literature values and hence the PAH SSTLs were re-derived.

Table 12 presents the SSTLs derived for those CoC which had exceedances on site and suggests possible overall soil and leachate remedial targets for the site. The lower of the EQS or DWS derived SSTL has been selected if practical. However, in some cases the SSTL is much lower than laboratory detection limits and where natural background concentrations of PAHs are higher in soils than the derived SSTLs these have been replaced with natural background levels. The SSTLs in Table 11 should only be applied to areas within 50 m of the A29 and in the vicinity of the Fontwell Avenue roundabout.

**Table 12:** Summary combined SSTL table with suggested remedial targets for the site.

CoC	Suggested Combined Soil SSTL mg/kg	Suggested Combined Leachate SSTL mg/l
Chromium - total	5370	0.170
Copper	798	0.0504
<i>Benzo(a)pyrene</i>	3.60 (NBC)	ND
<i>Benzo(b)fluoranthene</i>	1.66 (NBC)	ND
<i>Benzo(k)fluoranthene</i>	1.26 (NBC)	ND
<i>Benzo(ghi) perylene</i>	1.61	ND
<i>Fluoranthene</i>	5.28 (NBC)	ND
TPH C16-C121 Aromatic	41.9	0.0207
TPH C21-C35 Aromatic	318	0.0207

ND – SSTL not derived for leachate the SSTL is the same as the EQS.

NBC – natural background concentration (Defra, 2012) and standardly found concentrations in rural soils (Environment Agency, 2007)

Should SSTLs be required for other parts of the realignment then values will need to be calculated separately to those in this report. On removal of material at the former gravel pit area, should validation samples show elevated concentrations at depth above the SSTLs and evidence of a mobile source of contamination then a replacement monitoring well for BH101 will be provided. In that scenario, groundwater samples will be taken monthly for a duration of four months to demonstrate that minimal impact to the aquifer has occurred.

As over 600 m<sup>3</sup> of material will be removed from the site, leaving a greatly depleted soil source at the site, as the higher concentrations were found in the shallow samples, the risk to controlled waters receptors following the highway development is considered to be relatively minimal and this includes any slightly enhanced hydraulic gradients caused by new soakage pits.

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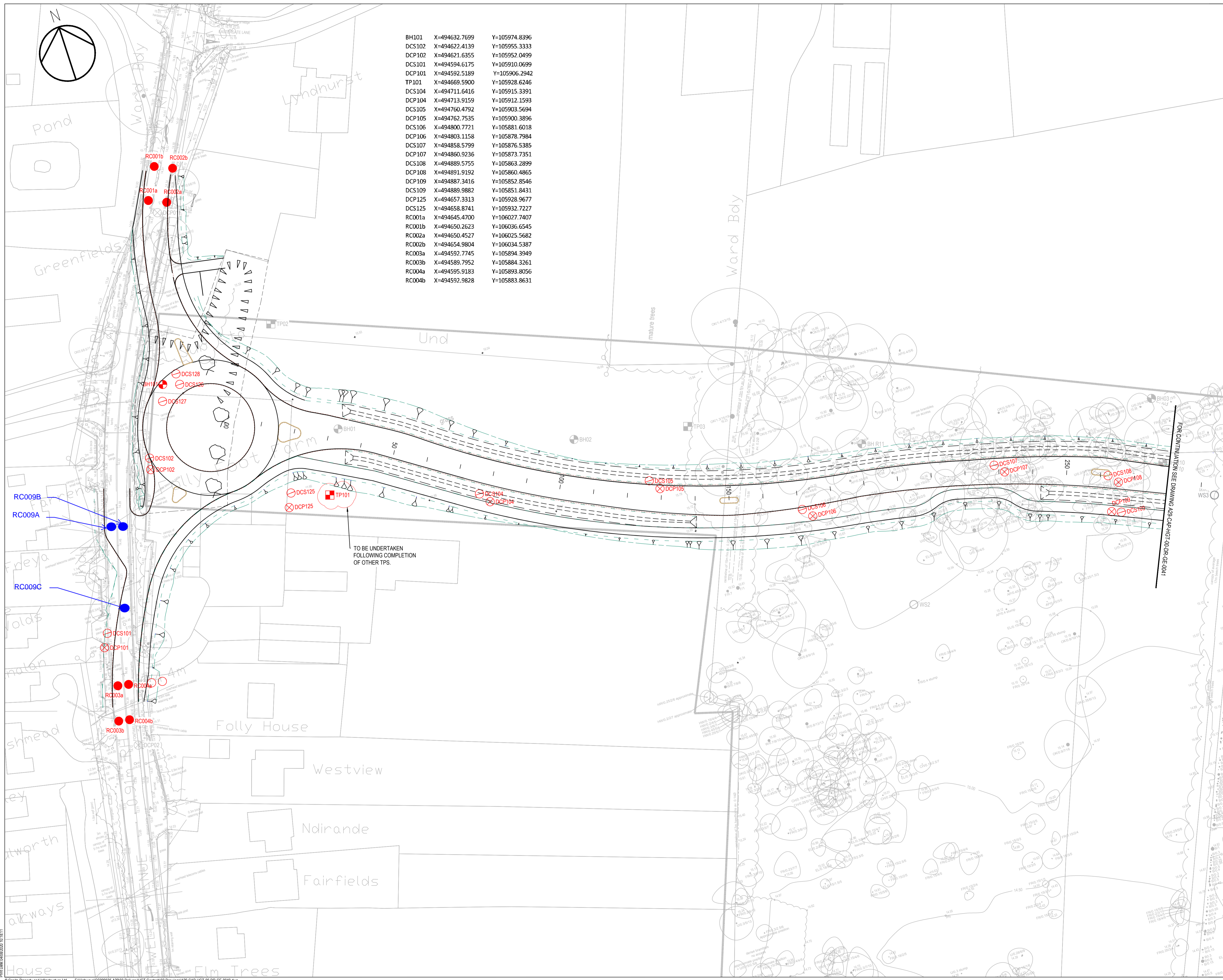
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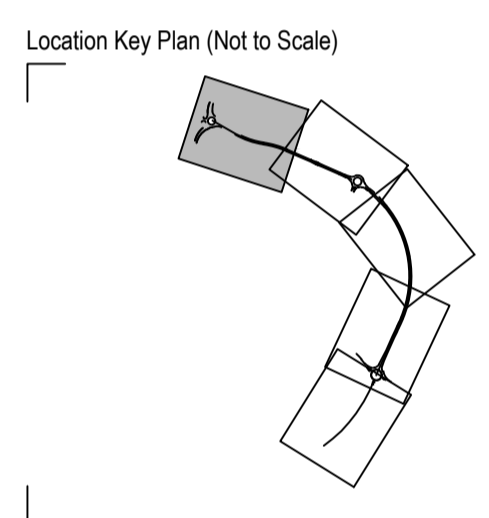
# Drawings





BH101	X=494632.7699	Y=105974.8396
DCS102	X=494622.4139	Y=105955.3333
DCP102	X=494621.6355	Y=105952.0499
DCS101	X=494594.6175	Y=105910.0699
DCP101	X=494592.5189	Y=105906.2942
TP101	X=494669.5900	Y=105928.6246
DCS104	X=494711.6416	Y=105915.3391
DCP104	X=494713.9159	Y=105912.1593
DCS105	X=494760.4792	Y=105903.5694
DCP105	X=494762.7535	Y=105900.3896
DCS106	X=494800.7721	Y=105881.6018
DCP106	X=494803.1158	Y=105878.7984
DCS107	X=494858.5799	Y=105876.5385
DCP107	X=494860.9236	Y=105873.7351
DCS108	X=494889.5755	Y=105863.2899
DCP108	X=494891.9192	Y=105860.4865
DCP109	X=494887.3416	Y=105852.8546
DCS109	X=494889.9882	Y=105851.8431
DCP125	X=494657.3313	Y=105928.9677
DCS125	X=494658.8741	Y=105932.7227
RC001a	X=494645.4700	Y=106027.7407
RC001b	X=494650.2623	Y=106036.6545
RC002a	X=494650.4527	Y=106025.5682
RC002b	X=494654.9804	Y=106034.5387
RC003a	X=494592.7745	Y=105894.3949
RC003b	X=494589.7952	Y=105884.3261
RC004a	X=494595.9183	Y=105893.8056
RC004b	X=494592.9828	Y=105883.8631

- NOTES:
- ALL DIMENSIONS ARE IN MILLIMETRES UNLESS SHOWN OTHERWISE.
  - EXISTING SP - EXISTING STANDPIPE TO BE CHECKED FOR FUNCTIONALITY AND MONITORED AS PART OF THIS INVESTIGATION.
- KEY: EXISTING / HISTORIC LOCATIONS
- BOREHOLE WSP2018
  - DYNAMIC CONE PENETROMETER WSP2018
  - TRIAL PIT WSP2018
  - WINDOW SAMPLE WSP2018
  - EXISTING BOREHOLE WILSON BAILEY 2018
- KEY: PROPOSED EXPLORATORY LOCATIONS
- CABLE PERCUSSIVE BOREHOLE
  - DYNAMIC SAMPLER HOLE
  - DYNAMIC PROBE LOCATION
  - TRIAL PIT
  - PAVEMENT CORE
  - WATER SAMPLE
  - GRAVEL PIT



Rev	Drawn	Checked	App'd	Description	Date
P04	CS	UL	KS	THREE NEW DCS POSITIONS MADE	31.07.20
P03	CS	FD	KS	AMENDMENTS MADE	15.07.20
P02	CS	UL	KS	AMENDMENTS MADE	09.09.20
P01	JPC	UL	KS	FIRST ISSUE	05.02.20

Purpose of Issue  
 For Review and Comment S3

Classification  
 Commercial in Confidence



Project  
 A29 Realignment Scheme

Drawing  
 Proposed Exploratory Hole Location Plan  
 Sheet 1 of 5

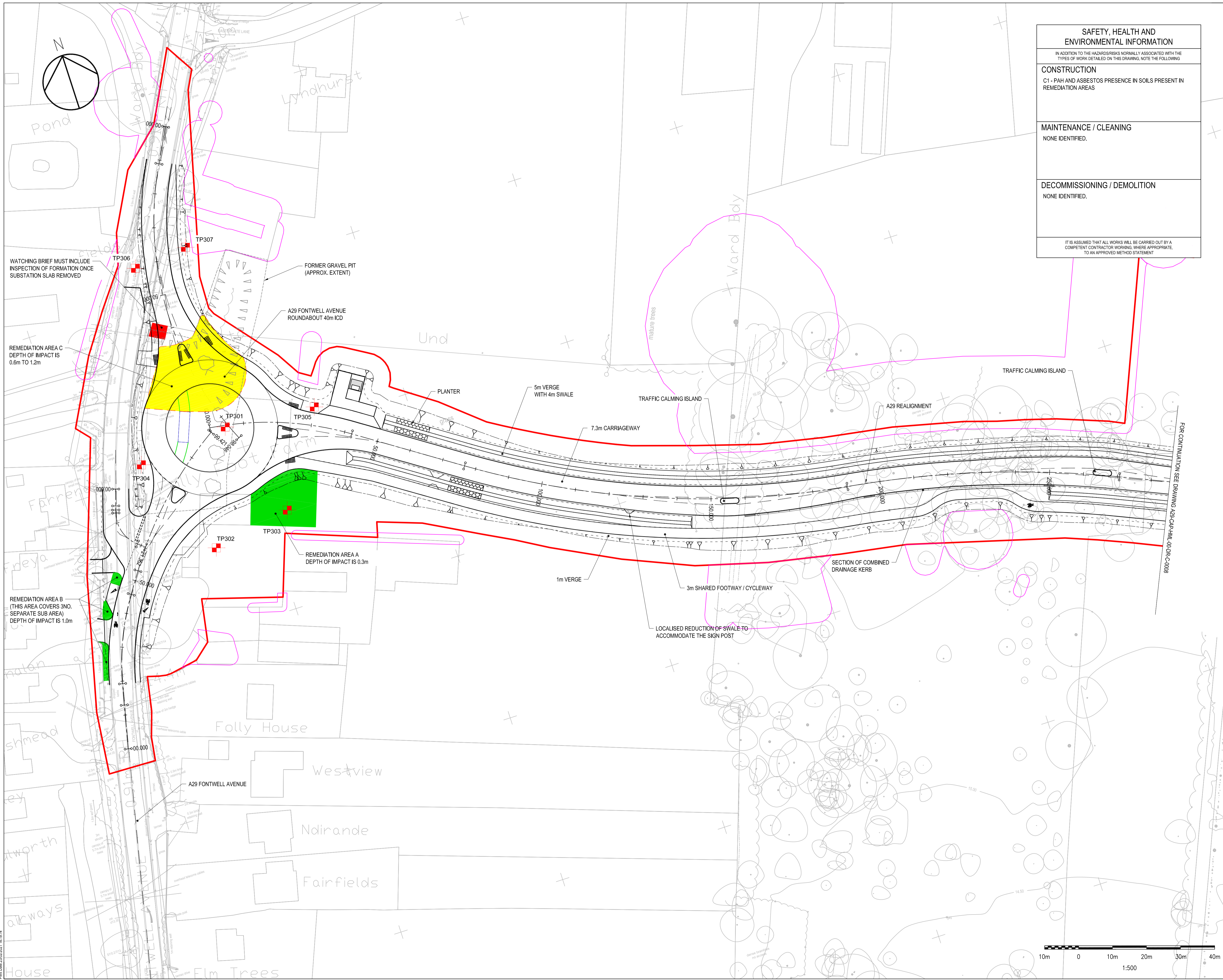
Scale @ A1	Drawn	Checked	Approved
1:500	JPC	UL	KS

Project No.	Date
CS099505	31-07-20

Drawing Identifier	BS1192 Compliant
Project - Originator - Zone - Level - File Type - Role - Number	revision
A29-CAP-HGT-00-DR-GE-0040	P04

Capita House, Wood Street, East Grinstead, RH19 1UU  
 01342 327161  
 www.capitaproperty.co.uk  
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SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION	
IN ADDITION TO THE HAZARDS/RISKS NORMALLY ASSOCIATED WITH THE TYPES OF WORK DETAILED ON THIS DRAWING, NOTE THE FOLLOWING	
<b>CONSTRUCTION</b>	C1 - PAH AND ASBESTOS PRESENCE IN SOILS PRESENT IN REMEDIATION AREAS
<b>MAINTENANCE / CLEANING</b>	NONE IDENTIFIED.
<b>DECOMMISSIONING / DEMOLITION</b>	NONE IDENTIFIED.
IT IS ASSUMED THAT ALL WORKS WILL BE CARRIED OUT BY A COMPETENT CONTRACTOR WORKING, WHERE APPROPRIATE, TO AN APPROVED METHOD STATEMENT	

- NOTES:**
1. APPLY WATCHING BRIEF WHILST EXCAVATING IN MADE GROUND THROUGHOUT THE WHOLE SITE.
  2. REMEDIATION AREAS A+B+C REQUIRE EDGE VALIDATION BY MEANS OF COLLECTING SAMPLES, TESTING AND CHECKING AGAINST APPENDIX 6/15 ACCEPTANCE CRITERIA
  3. REMEDIATION ACTIONS COMPRISE ENSURING THAT IN SOFT LANDSCAPING AREAS, EITHER THE FULL THICKNESS OF CLASS U1B IS REMOVED, ELSE THAT A 450mm THICK CAP OF CLEAN MATERIAL IS PRESENT. NEW TOPSOIL LAYERS CAN GO TOWARD THE REQUIRED CAPPING THICKNESS. AT REMEDIATION AREA C THE PLANNED CUT SHOULD REMOVE VAST MAJORITY OF CLASS U1B.
  4. ON REMOVAL OF MATERIAL AT REMEDIATION AREA C, THREE VALIDATION SAMPLES SHOULD BE TAKEN OF THE FORMATION AND TESTED FOR SPECIATED PAH'S AND CWG HYDROCARBONS AND SHOULD THESE RESULTS SHOW ELEVATED CONCENTRATIONS ABOVE THE SSTLS AND EVIDENCE OF A MOBILE SOURCE OF CONTAMINATION THEN A REPLACEMENT MONITORING WELL FOR BH101 SHALL BE PROVIDED. A SUITABLE PLACE FOR THIS WILL BE ON THE SOUTHERN SITE BOUNDARY, NEAR TP302.

**KEY:**

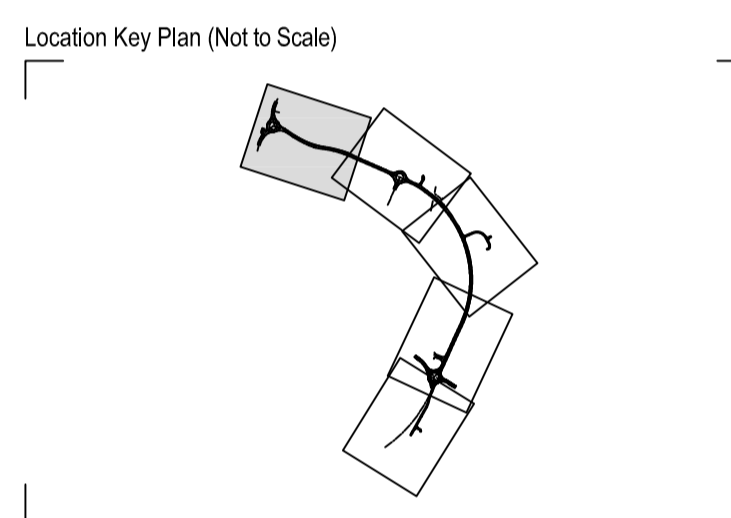
- REMEDIATION AREA WHERE ACTIONS OVER AND ABOVE PLANNED CUT ARE NEEDED
- REMEDIATION AREA WHERE CUT SHOULD DELIVER REMEDIATION
- VALIDATION SAMPLING PIT  
TP302

WATCHING BRIEF MUST INCLUDE INSPECTION OF FORMATION ONCE SUBSTATION SLAB REMOVED

REMEDATION AREA C DEPTH OF IMPACT IS 0.6m TO 1.2m

REMEDATION AREA B (THIS AREA COVERS 3NO. SEPARATE SUB AREA) DEPTH OF IMPACT IS 1.0m

REMEDATION AREA A DEPTH OF IMPACT IS 0.3m



P02	KS	NG	TP NUMBERS AMENDED, WELL REMOVED, NOTE 4	23.02.21
P01	JB	KS	ADDED FIRST ISSUE	15.01.21
Rev	Drawn	Checked	Approved	Date

Purpose of Issue: For Review and Comment S3

Classification: Commercial in Confidence



Project: A29 Realignment Scheme

Drawing: Remediation Actions Sheet 1 of 1

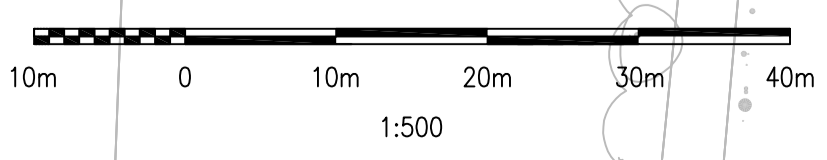
Scale @ A1	Drawn	Checked	Approved
1:500	JB	NG	KS

Project No. CS099505 Date 13.01.21

Drawing Identifier: A29-CAP-HGT-00-DR-GE-0227



Capita House, Wood Street, East Grinstead, RH19 1UU  
01342 327161  
www.capitaproperty.co.uk  
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File Path: 23/02/2021 15:34



# Appendix A RTM Spreadsheets

Soil Source leaching vertically through Made Ground/Head Gravels and then laterally migrating through the gravels to drainage ditch and ultimately the Lidsey Rife

Parameter	Value	Units	Justification
<b>Level 1 Soil</b>			
Water Filled Soil Porosity	0.129	Fraction	P20 porosity calculator used assuming 1.37 - 1.81 g/cm <sup>3</sup> (average bulk density 1.59 g/cm <sup>3</sup> ) and a moisture content of 8.83% on average from on-site sand/gravel materials. Total porosity 47.4 %
Air Filled Soil Porosity	0.345	Fraction	P20 porosity calculator used assuming 1.59 g/cm <sup>3</sup> bulk density and a moisture content of 8.83% on average from on-site materials.
Bulk Density	1.59	g/cm <sup>3</sup>	1.37 to 1.81 g/cm <sup>3</sup> : Gravelly sand - ConSim. BH101, DCS126, DCS127, DCS128 have log descriptions of gravelly sand through to medium sand - conservative value
FOC	0.0064	Fraction	Data from 1 unsaturated sample from sand/gravel in TP02 in the Made Ground. Other samples are from a clay matrix and therefore not conservative.
<b>Level 2 Soil (Dilution in the RTD)</b>			
Infiltration	6.52E-04	m/d	922 mm /year of rainfall occurs in the catchment according to the rainfall station at Chichester ( <a href="https://nra.ceh.ac.uk/data/station/spatial/41023">https://nra.ceh.ac.uk/data/station/spatial/41023</a> ). MetOffice averages for Bognor Regis give 725 mm/year average ( <a href="https://www.metoffice.gov.uk/research/climate/maps-and-data/uk-climate-averages/gcp8bswv">https://www.metoffice.gov.uk/research/climate/maps-and-data/uk-climate-averages/gcp8bswv</a> ). Site likely to be more aligned with Chichester as it is inland. Effective rainfall is quoted as 476 mm/year in Table 1 of <a href="http://nora.nerc.ac.uk/id/eprint/12713/1/SD99001.pdf">http://nora.nerc.ac.uk/id/eprint/12713/1/SD99001.pdf</a> . Taking into account the site post development will be 50% hardstanding this equates 6.52 x 10 <sup>-4</sup> m/day
Length of Contaminant Source	5 - 15	m	Length of source is contaminant specific. Groundwater flow assumed to be to the east south east. See Table 12.
Saturated Aquifer Thickness	4.48	m	Depth to London Clay recorded in WSP BH01, BH04A, BH06 - BH09, DCS124 at an average depth of 7.17 m bgl. Groundwater strike levels after 20 mins in these boreholes an average of 2.44 mbgl giving an average saturated thickness of 4.48 m
Hydraulic Conductivity	0.5	m/d	Site data average - falling head tests on BH101 and DCS125 give 6.08 x 10 <sup>-4</sup> m/s (BH101 deep) to 2.4 x 10 <sup>-7</sup> m/s (DCS125) which converts to 0.52 m/day and 0.02 m/day. Check via Bouwer and Rice analysis reveals similar values giving confidence. Log descriptions in BH101 indicate a coarse sandy gravel in the saturated zone with silt, so whilst layers of silt are present within the aquifer 0.5 m/day considered appropriate. Higher values of 5 m/day to be used in sensitivity analysis.
Hydraulic Gradient	0.002	Fraction	Average hydraulic gradient on-site from 28th October 2020 monitoring round data. Data from 2nd and 9th November 2020 supports this value and direction of SE
Width of Contaminant Source	10-25	m	Contaminant specific - see table. Dimension perpendicular to groundwater flow.
<b>Level 3 Soil</b>			
Bulk Density	2.09	g/cm <sup>3</sup>	Values taken for Head Deposits in WSP BH07, BH08, TP15 and Nicholls Colton BH101
Effective Porosity	0.15	Fraction	From De Marsily (1986) for a gravelly sand (specific yield)
Distance to Compliance Point	500	m	Distance from the edge of the soil source zone around BH101 to the drain at the Halo complex and drain around residential housing around Downview Road - 820 m. Hypothetical compliance point selected at 500 m as a cross gradient stream is closer.
FOC	0.0028	Fraction	Site specific data for BH09 taken at depths of 2 and 4 m in sand/gravel at 0.26 and 0.30%

Soil Source leaching vertically through Made Ground/Head Deposits and then laterally migrating through the RTD to 50 m compliance point in Head Deposits

Parameter	Value	Units	Justification
<b>Level 1 Soil</b>			
Water Filled Soil Porosity	0.129	Fraction	P20 porosity calculator used assuming 1.37 - 1.81 g/cm <sup>3</sup> (average bulk density 1.59 g/cm <sup>3</sup> ) and a moisture content of 8.83% on average from on-site sand/gravel materials. Total porosity 47.4 %
Air Filled Soil Porosity	0.345	Fraction	P20 porosity calculator used assuming 1.59 g/cm <sup>3</sup> bulk density and a moisture content of 8.83% on average from on-site materials.
Bulk Density	1.59	g/cm <sup>3</sup>	1.37 to 1.81 g/cm <sup>3</sup> : Gravelly sand - ConSim. BH101, DCS126, DCS127, DCS128 have log descriptions of gravelly sand through to medium sand - conservative value
FOC	0.0064	Fraction	Data from 1 unsaturated sample from sand/gravel in TP02 in the Made Ground. Other samples are from a clay matrix and therefore not conservative.
<b>Level 2 Soil (Dilution in the RTD)</b>			
Infiltration	6.52E-04	m/d	922 mm /year of rainfall occurs in the catchment according to the rainfall station at Chichester ( <a href="https://nra.ceh.ac.uk/data/station/spatial/41023">https://nra.ceh.ac.uk/data/station/spatial/41023</a> ). MetOffice averages for Bognor Regis give 725 mm/year average ( <a href="https://www.metoffice.gov.uk/research/climate/maps-and-data/uk-climate-averages/gcp8bswv">https://www.metoffice.gov.uk/research/climate/maps-and-data/uk-climate-averages/gcp8bswv</a> ). Site likely to be more aligned with Chichester as it is inland. Effective rainfall is quoted as 476 mm/year in Table 1 of <a href="http://nora.nerc.ac.uk/id/eprint/12713/1/SD99001.pdf">http://nora.nerc.ac.uk/id/eprint/12713/1/SD99001.pdf</a> . Taking into account the site post development will be 50% hardstanding this equates 6.52 x 10 <sup>-4</sup> m/day
Length of Contaminant Source	5 - 15	m	Length of source is contaminant specific. Groundwater flow assumed to be to the east south east. See Table 12.
Saturated Aquifer Thickness	4.5	m	Depth to London Clay recorded in WSP BH01, BH04A, BH06 - BH09, DCS124 at an average depth of 7.17 m bgl. Groundwater strike levels after 20 mins in these boreholes an average of 2.44 mbgl giving an average saturated thickness of 4.48 m
Hydraulic Conductivity	0.5	m/d	Site data average - falling head tests on BH101 and DCS125 give 6.08 x 10 <sup>-4</sup> m/s (BH101 deep) to 2.4 x 10 <sup>-7</sup> m/s (DCS125) which converts to 0.52 m/day and 0.02 m/day. Check via Bouwer and Rice analysis reveals similar values giving confidence. Log descriptions in BH101 indicate a coarse sandy gravel in the saturated zone with silt, so whilst layers of silt are present within the aquifer 0.5 m/day considered appropriate. Higher values of 5 m/day to be used in sensitivity analysis.
Hydraulic Gradient	0.002	Fraction	Average hydraulic gradient on-site from 28th October 2020 monitoring round data. Data from 2nd and 9th November 2020 supports this value and direction of SE
Width of Contaminant Source	10-25	m	Contaminant specific - see table. Dimension perpendicular to groundwater flow.
<b>Level 3 Soil</b>			
Width of Plume	10-25	m	Contaminant specific - see table. Dimension perpendicular to groundwater flow.
Bulk Density	2.09	g/cm <sup>3</sup>	Values taken for Head Deposits in WSP BH07, BH08, TP15 and Nicholls Colton BH101
Effective Porosity	0.15	Fraction	From De Marsily (1986) for a gravelly sand (specific yield)
Distance to Compliance Point	50	m	Distance from the edge of the soil source zone to 50 m compliance point in aquifer
FOC	0.0028	Fraction	Site specific data for BH09 taken at depths of 2 and 4 m in sand/gravel at 0.26 and 0.30%

#### Contaminant Specific Parameters

Parameter	Value	Units	Justification
<b>Benzo(a)pyrene</b>			
Henry's Law Constant	1.76E-06	-	SC050021/SR7
KOC	128825	ml/g	log Koc = 5.11 from Science Report - SC50021/SR7
Half Life	1060	Days	Half life in groundwater Howard et al. 1991
<b>Benzo(b) fluoranthene</b>			
Henry's Law Constant	0.0000205	-	SC050021/SR7
KOC	104713	ml/g	log Koc = 5.02 from Science Report - SC50021/SR7
Half Life	1220	Days	Half life in groundwater Howard et al. (1991) Environmental degradation rates
<b>Benzo(k) fluoranthene</b>			
Henry's Law Constant	0.0000017	-	SC050021/SR7
KOC	147911	ml/g	log Koc = 5.17 from Science Report - SC50021/SR7
Half Life	4280	Days	Half life in groundwater Howard et al. (1991) Environmental degradation rates
<b>Fluoranthene</b>			
Henry's Law Constant	0.0000629	-	Science Report - SC050021/SR7
Koc	18197	ml/g	log Koc = 4.26 from Science Report - SC50021/SR7
Half Life	1990	Days	<a href="https://pubchem.ncbi.nlm.nih.gov/compound/9154#section=Environmental-Biodegradation">https://pubchem.ncbi.nlm.nih.gov/compound/9154#section=Environmental-Biodegradation</a> Average of the 3.1 to 7.8 years quoted.
<b>Benzo (g,h,i) perylene</b>			
Henry's Law Constant	2.36E-06	-	Science Report - SC050021/SR7
Koc	416869	ml/g	log Koc = 5.62 from Science Report - SC50021/SR7
Half Life	1299	Days	Groundwater Chemicals Desk Reference Montgomery 4th ed. 3.23 to 3.56 years given - 3.56 years used as a conservative value.
<b>Indeno(1,2,3-cd) perylene</b>			
Henry's Law Constant	0.00000205	ml/g	Science Report - SC050021/SR7
Koc	87096	ml/g	log Koc = 4.94 from Science Report - SC50021/SR7
Half Life	1.46E+03	days	Howard et al. (1991) Environmental degradation rates
<b>Chromium</b>			
Kd	31622	ml/g	<a href="https://archive.epa.gov/epawaste/hazard/web/pdf/s0524.pdf">https://archive.epa.gov/epawaste/hazard/web/pdf/s0524.pdf</a> . Converted from log Kd of 4.5
Half Life	9.00E+99	days	No biodegradation assumed.
<b>Copper</b>			
Kd	15849	ml/g	<a href="https://archive.epa.gov/epawaste/hazard/web/pdf/s0524.pdf">https://archive.epa.gov/epawaste/hazard/web/pdf/s0524.pdf</a> . Converted from log Kd of 4.2
Half Life	9.00E+99	days	No biodegradation assumed.
<b>TPH C16-C21 Aromatic</b>			
Henry's Law Constant	0.013	-	TPH CWG Vol 5 p8.
KOC	15849	ml/g	TPH CWG log Koc = 4.2
Half Life	3650	Days	New Zealand Guidelines : 1999 : Modules. Guidelines for Assessing and Managing Petroleum Hydrocarbon Contaminated Sites in New Zealand. Ministry for the Environment.
<b>TPH C21-C35 Aromatic</b>			
Henry's Law Constant	6.70E+04	-	TPH CWG Vol 5 p8.
KOC	125892	ml/g	TPH CWG Volume 5 p8. Log Koc = 5.1
Half Life	3650	Days	New Zealand Guidelines : 1999 : Modules. Guidelines for Assessing and Managing Petroleum Hydrocarbon Contaminated Sites in New Zealand. Ministry for the Environment.

#### Soil source sizes

Contaminant	Width (m)	Length (m)	Justification
Cr	10	10	Elevated leachate in BH101 and DCS128 only
Cu	30	20	Elevated leachate in BH101 particularly so area of gravel pit taken for conservatism
TPH aromatic C16-C21	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101
TPH aromatic C21-C35	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101
Fluoranthene	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101
Benzo(b) fluoranthene	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101
Benzo(k) fluoranthene	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101
Benzo(ghi)perylene	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101
Indeno(123-cd) pyrene	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101
Benzo(a)pyrene	30	20	Elevated soil and groundwater concentrations in the vicinity of BH101, DCS128, DCS125 and DCS101

# Appendix B Selected borehole logs

NICHOLLS COLTON GROUP				BOREHOLE RECORD - BH101			
				Cable Percussion			
Client: Jackson Civil Engineering				Boring Diameter: 150mm to 20.00m		Casing Diameter: 100mm to 9.00m	
Logged By: UW				Ground Level: 14.99m AOD		Date: 30/07/20	
				Location: - 494552, 1025581		Scale: 1:50	
Project No.: G20107							
Site: A29 Eastergate							
Samples and In situ Tests				Strata Description			
Ref	Depth (m)	SPT (N)	Water	Level (m AOD)	Depth (m)	Legend	Backfill
E51	0.10			14.79	0.20		
E2	0.20 - 0.30			14.48	0.50		
E3	0.50						
E7	0.50 - 1.00						
E55	0.70						
S	1.20	0 for 0mm					
E5	1.20 - 1.70						
E5	2.00 - 2.50			12.99	2.00		
D4	2.50						
C	3.00	50 for 255mm		11.99	3.00		
E7	3.00 - 3.50						
D6	3.50						
C	4.00	n=34					
E9	4.00 - 4.50						
D8	4.50						
C	5.00	n=24		9.99	5.00		
E11	5.00 - 5.50						
D10	5.50						
D12	5.00			8.99	5.00		
C	5.50	n=25					
E13	5.50 - 7.00						
D14	7.00						
C	8.00	n=25					
E16	8.00 - 8.50						
D15	8.50						
D17	9.00						
S	9.50	n=27					
E19	10.00 - 10.50			4.99	10.00		

Remarks and Water Observations

- Hand dug starter pit to 1.20m.
- Unable to carry out SPT at 1.20m due to refusal on concrete (made ground).
- Groundwater encountered at 8.90m, rising to 4.50m after 10 minutes and 4.10m after 20 minutes.
- Borehole installed with 80mm standpipe (4.00m-6.00m response zone) and 19mm piezo standpipe (17.00m-20.00m response zone).

Sheet 1 of 3


AGS

NICHOLLS COLTON GROUP		BOREHOLE RECORD - BH101						
		Cable Percussion						
		Site: A29 Eastergate						
Client: Jackson Civil Engineering		Boring Diameter: 150mm to 20.00m	Casing Diameter: 200mm to 9.00m	Project No.: G20107				
Logged by: UW		Ground Level: 14.89m AOD	Date: 30/07/20	Location: - 494858, 108892(N)	Scale: 1:50			
Ref.	Depth (m)	Samples and in situ Tests (SPT %)	Water	Level (mAOD)	Depth (m)	Strata Description	Legend	Backfill
018	10.00					Stiff grey silty CLAY		
						...occasional stiff red silty clay bands between 10.50m and 15.0m		
821	11.00 - 11.50							
020	11.00							
U22	11.00 - 11.45	(100)						
025	11.50							
825	12.00 - 12.50							
024	12.00							
5	12.50	N=58						
827	15.00 - 15.50							
026	15.00							
851	14.00 - 14.50							
028	14.00							
U29	14.00 - 14.45	(100)						
030	14.50							
855	15.00 - 15.50							
032	15.00							
5	15.50	for 275mm						
855	18.00 - 18.50							
034	18.00							
839	17.00 - 17.50							
036	17.00							
U37	17.00 - 17.35	(100)						
038	17.40							
841	18.00 - 18.50							
040	18.00							
5	18.50	50 for 100mm						
845	19.00 - 19.50							
042	19.00							
5	20.00	50 for 100mm		-5.01	20.00			


Remarks and Water Observations

- Hand dug starter pit to 1.20m.
- Unable to carry out SPT at 1.20m due to refusal on concrete (made ground).
- Groundwater encountered at 5.90m, rising to 4.90m after 10minutes and 4.10m after 20 minutes.
- Borehole installed with 50mm standpipe (4.00m-6.00m response zone) and 19mm piezo standpipe (17.00m-20.00m response zone).

Sheet 2 of 3





			<b>BOREHOLE RECORD - DCS125A</b> Window Sampler						
Client: Jackson Civil Engineering			Boring Diameter: 100mm to 5.00m		Casing Diameter: 		Project No.: G20107		
Logged by: UW			Ground Level: 15.741m AOD		Date: 27/07/20		Location: - 4948296, 1099226		Scale: 1:50
Samples and in situ Tests			Water	Level (mAOD)	Depth (m)	Strata Description	Legend	Backfill	
Ref.	Depth (m)	SPT N							
				15.54	0.20	MADE GROUND - Topsoil Firm brown slightly gravelly very sandy clayey SILT. Gravel is angular to sub-angular fine to medium flint.			
				14.54	1.20	Medium dense angular to sub-angular flint GRAVEL in a brown silty slightly sandy clay matrix			
				13.74	2.00	Medium dense angular to sub-angular flint GRAVEL in a brownish cream silty sandy clay matrix			
D1	3.00 - 4.00								
C	4.00	N=12		11.74	4.00	Medium dense brownish cream gravelly sandy silty CLAY. Gravel is angular to sub-angular fine to coarse flint and chalk			
D2	4.50 - 5.00								
C	5.00	N=13		10.74	5.00				

Remarks and Water Observations

1. Hand dug starter pit to 1.00m.
2. No groundwater seepages encountered during boring operations.
3. Borehole installed with 90mm HDPE standpipe (GL-0.50m plain, 0.50-4.50m slotted).

Capita Property and Infrastructure Ltd

Capita House  
Wood Street  
East Grinstead  
West Sussex  
RH19 1UU

Tel +44 (0)1342 327161

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## Appendix N

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# Precautionary Method of Works for Building B5



West Sussex County Council

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# **A29 REALIGNMENT**

Precautionary Method of Works for Building B5



West Sussex County Council

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## **A29 REALIGNMENT**

Precautionary Method of Works for Building B5

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WSP

2 London Square

Cross Lanes

Guildford, Surrey




GU1 1UN

Phone: +44 148 352 8400

WSP.com

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## **APPENDICES**

APPENDIX A

BRIEFING RECORD

# 1 INTRODUCTION

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## 1.1 PLANNING BACKGROUND

1.1.1. West Sussex County Council (WSCC) obtained detailed planning permission in June 2021 for Phase 1 of the realignment of the A29 (hereafter referred to as 'the Scheme'), to the north of Eastergate and to the north-west of Barnham, villages north of Bognor Regis (as shown in Figure 1). The full area encompassed by the Scheme is hereafter referred to as the 'Site'.

1.1.2. The Site is currently greenfield agricultural land including open fields and unmanaged orchard, and partially incorporates a wooded Public Right of Way (PRoW) running in a north-to-south direction and connects between Eastergate Lane and the B2233 Barnham Road. To the west of the Site is the current route for the A29, and to the north of the Site is Eastergate Lane. The B2233 Barnham Road runs along the southern side of the Site, and a residential complex is present to the east of the Site.

1.1.3. The Scheme will comprise the following:

*The construction of a 1.3km single carriageway with a 3m wide shared cycleway / footway, 2.5m wide central island, four uncontrolled crossings, three roundabouts, landscaping, noise barriers and other associated works.*

1.1.4. A number of conditions are associated with the planning permission of the Scheme. In particular, Condition 3 refers to the Construction Environmental Management Plan (CEMP) and states the following:

*No development shall be carried out until an updated Construction Environmental Management Plan – CEMP (in general accordance with the submitted Outline Construction Environmental Management Plan – Ref. 70079718 V04 dated April 2021) has been submitted to and approved in writing by the County Planning Authority.*

*The CEMP shall address the environmental management of the construction works and describe how construction activities will be managed in accordance with relevant standards and best practice to safeguard the environment and mitigate the effects of construction works...Further, it shall include, but not be limited to, the following:..*

- Provision for all works to be carried out under the supervision of an Environmental Clerk of Works, Ecological Clerk of Works, Project Arboriculturalist and provide for the appointment of a Public Liaison Officer and specify their respective roles and responsibilities.*
- Precautionary Method of Works (PMoW) for bats/birds/reptiles/invertebrates – protected and notable species.*

## 1.2 AIMS AND OBJECTIVES

1.2.1. In order to contribute to the discharge of Condition 3, WSCC commissioned WSP to prepare a PMoW document detailing how construction works should proceed in relation to Building B5, a confirmed bat roost (see ecological background in Section 2 for further details).



- 1.2.2. General precautionary working methods for ecological constraints across the remainder of the Scheme, including bats in trees and other protected species, are detailed in a separate PMoW (WSP, 2021).

## 2 ECOLOGICAL BACKGROUND AND LEGISLATION

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### 2.1 ECOLOGICAL BACKGROUND

- 2.1.1. A suite of ecological surveys were completed in 2019 to inform the planning application for the Scheme, including surveys for roosting bats.
- 2.1.2. An initial Preliminary Bat Roost Assessment (PBRA) was conducted in 2019 which identified three buildings (B2, B5, B7 on Figure 1) and 44 trees with suitability to support roosting bats. For the buildings, subsequent dusk emergence and/or dawn re-entry surveys were undertaken to determine the presence or likely absence of roosting bats. An individual soprano pipistrelle *Pipistrellus pygmaeus* and an individual serotine bat *Eptesicus serotinus* were observed emerging from building B5 during the dusk/dawn surveys, and as such building B5 was confirmed as a transitional bat roost for these species. It is considered that building B5 has negligible suitability to support a hibernation roost, based on the construction and condition of the structure. Roosting bats are considered to be likely absent from buildings B2 and B7 as a result of the dusk emergence and dawn re-entry surveys completed.

### 2.2 RELEVANT LEGISLATION

- 2.2.1. Bats and their roosts are afforded a high level of protection under the Conservation of Habitats and Species Regulations 2017, as amended. The legislation means that it is an offence to:
- Deliberately capture, injure or kill a wild bat;
  - Deliberately disturb wild bats; disturbance of animals includes in particular any disturbance which is likely:
    - (a) to impair their ability (i) to survive, to breed or reproduce, or to rear or nurture their young; or (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate;
    - (b) to affect significantly the local distribution or abundance of the species to which they belong; and
  - Damage or destroy a breeding site or resting place used by this species.
- 2.2.2. Protection is also afforded under the Wildlife and Countryside Act 1981, as amended, with respect to disturbance of animals when using places of shelter and obstruction of access to places of shelter.
- 2.2.3. Building B5, and therefore the transitional soprano pipistrelle and serotine roost, will be retained as part of the Scheme and therefore there will be no direct loss of this roost. However, as building B5 is located directly adjacent to the construction works area, construction activities resulting in excessive noise or vibrations have the potential to disturb roosting bats and may deter roosting bats from using the structure.
- 2.2.4. The precautionary working methods set out in Section 3 below include measures which will seek to minimise the disturbance of roosting bats during the construction phase of the Scheme.

## 3 PRECAUTIONARY METHOD OF WORKS

### 3.1 OVERVIEW

- 3.1.1. This PMoW has been produced with reference to the following good practice guidance:
- Bat Mitigation Guidelines (English Nature, 2004);
  - Bat Mitigation Guidelines: A guide to impact assessment and compensation for developments affecting bats (Beta version 1.0: June 2021) (CIEEM, 2021); and
  - Bats and Artificial Lighting in the UK Guidance Note (Institute of Lighting Professionals, 2018).
- 3.1.2. Under the mitigation hierarchy set out in the Bat Mitigation Guidelines (English Nature, 2004), impacts should be avoided wherever possible in the first instance to ensure no negative impacts on existing roosts or populations. Where avoidance is not possible, impacts should be mitigated to reduce the likely impacts to the roost. As a last resort, where avoidance or mitigation cannot be used, the principle of compensation should be used to offset the damage caused by development.
- 3.1.3. It is considered the Scheme and the measures set out in this PMoW follow the principles of the mitigation hierarchy as set out in the Bat Mitigation Guidelines (English Nature, 2004). In particular, the Scheme has been designed to retain building B5, and thereby avoid direct loss of this roost. Mitigation measures as set out below will be utilised to reduce the impacts of disturbance from construction activities to the roost.

### 3.2 TOOLBOX TALK

- 3.2.1. The details of this PMoW will be presented to all staff conducting works near building B5 by a suitably qualified ecologist (SQE). An SQE is defined in this document as an ecologist with prior bat experience and knowledge of the roost in building B5.
- 3.2.2. The SQE will carry out the production of inductions and toolbox talks to contractors and will explain the ecological sensitivities of building B5 in relation to the Scheme. A record of briefings should be maintained by the nominated contractor. Appendix A provides a model briefing record which may be used.

### 3.3 PROPOSED ACTIVITIES

- 3.3.1. Based on the current programme of works for the Scheme, it is understood that construction activities in the vicinity of B5 will comprise the following as set out in Table 3-1 below.
- 3.3.2. It is understood that the majority of activities described in Table 3-1 will be undertaken during regular daytime working hours (indicatively 08:00-18:00). However, infrequent evening shifts between 19:00 and 00:00 may be required to complete elements of the carriageway tie-in and carriageway reconstruction works towards the end of the construction phase. As such, artificial lighting and vehicle lighting is likely to be required to complete these works.

**Table 3-1 – Construction activities in the vicinity of B5**

Activity	Plant/equipment required	Closest distance from B5 (approx.)
Earthworks	25t tracked 360 excavator	5m

Activity	Plant/equipment required	Closest distance from B5 (approx.)
	A25 dumpertruck 160 earthworks roller	
Road construction	20t tracked 360 excavator 20t delivery lorries 120 roller	15m
Footway construction	9t tracked 360 excavator 6t dumpers 120/80 rollers Mini paver Petrol disc cutter	7m (30m for petrol disc cutting)
Drainage works	25t tracked excavator Trench compactor plate 6t dumper Petrol disc cutter	40m
Demolition works	30t tracked 360 excavator with jaws 30t tracked excavator with breaker 30t tracked excavator Disposal lorries	50m
Surfacing works	Paving machine Delivery lorries 160 road rollers	15m
Carriageway reconstruction	1m road planer JCB excavator with breaker 18t wheeled excavator 120/160 road rollers Paving machine Delivery lorries Petrol disc cutter Road breaker	70m
Carriageway tie-in	1m road planer JCB excavator with breaker 160 road rollers	70m

Activity	Plant/equipment required	Closest distance from B5 (approx.)
	Paving machine Delivery lorries Petrol disc cutter Road breaker	

### 3.4 TIMINGS OF WORKS

- 3.4.1. Building B5 supports a transitional/summer roost for soprano pipistrelle and serotine bats, and therefore is used opportunistically by a small number of bats. B5 is considered unsuitable to support hibernating bats. As such, it is considered that low numbers of bats will be actively using building B5 between the summer active season (May to September inclusive), and that bats are considered unlikely to be present within building B5 during the typical hibernation period (October/November to April inclusive, depending on prevailing weather conditions).
- 3.4.2. In light of the above, the following mitigation measures in relation to timing of the works will be adhered to:
- Wherever possible, all construction activities within 20m of building B5 should be conducted in the period October/November to April inclusive, when roosting bats are considered to be likely absent from building B5. It is understood that this will be feasible for the majority of works within 20m of B5 (see Table 3-1), including the road construction, footway construction and surfacing works.
  - Where construction activities within 20m of building B5 are unavoidable within the summer roosting season (May to September inclusive), these will be conducted during daytime hours. Such works will be completed no later than one hour before sunset each working day so as to avoid discouraging bats to emerge from the roost through construction activities. It is understood that this is likely to apply to a small section of works including earthworks and part of the road construction programme.
  - The remaining construction activities described in Table 3-1 (demolition works, carriageway reconstruction and carriageway tie-in) are understood to be located over 20m from building B5 and are not expected to cause significant disturbance through vibration or noise. The majority of these works will be conducted during daytime hours, although a small number of infrequent evening shifts with artificial lighting may be required to complete certain elements. Where artificial lighting is used, this will comply with the measures set out in Section 3.5 below.

### 3.5 GENERAL MITIGATION MEASURES

#### Roost protection measures

- 3.5.1. Building B5 is currently located outside the proposed highway boundary of the Scheme, but within approximately 5m of this boundary and within the vicinity of Site Compound B. In order to minimise



the risk of accidental damage caused to the roosting features, Heras fencing (or similar) will be erected around building B5 to demark this building from construction plant and machinery.

- 3.5.2. Heras fencing will be installed with acoustic reduction barriers or similar noise cancellation material in order to minimise noise disturbance from adjacent construction works and vehicle movements. It is also expected that the use of such barriers will assist in reducing light spill onto the roost, in addition to the lighting measures set out below.
- 3.5.3. Heras fencing should be installed in such a way so as not to block the known access/egress point used by roosting bats on building B5 (refer to Figure 1 for the location of this access/egress point). The installation of the Heras fencing will be confirmed with the SQE upon completion to verify that confirmed roosting features have not been obstructed. The Heras fencing should remain in place for the duration of the construction phase.
- 3.5.4. Plant access routes required for the Scheme will not be directed within 5m of building B5, so as to minimise the risk of plant collision during the construction phase.

### **Artificial lighting**

- 3.5.5. It is understood that the majority of construction activities will be conducted during regular daytime hours (indicatively 08:00 – 18:00 inclusive). However, depending on the time of year, later works (after approximately 16:00) may be undertaken in low light conditions after sunset. Similarly, a small number of activities will be completed on evening shifts, including works associated with the carriageway reconstruction and the carriageway tie-in. As such, there may be a requirement for artificial lighting for works in the vicinity of building B5.
- 3.5.6. In order to minimise the risk of disturbance to the roost, the following measures will be adhered to:
  - The confirmed roosting feature on the northern aspect of the building will not be directly illuminated by any temporary artificial construction lighting.
  - Wherever possible, overnight, evening and dark works will be restricted to the hibernation period as set out in Section 3.4, when bats are likely to be absent from B5, to minimise the risk of direct or indirect light spill onto the roosting feature.
  - Where the use of artificial lighting is unavoidable, this will be task-orientated with luminaires sited only where required to complete the required tasks, with lighting column heights and horizontal mounting carefully considered to minimise light spill. The use of baffles, hoods or louvres will be considered as a last resort to reduce light spill and direct light where it is needed.
  - Luminaires selected for temporary lighting will use a warm white spectrum (ideally 2700k or less) to reduce blue light components, and should feature wavelengths higher than 550nm to avoid the component of light most disturbing to bats.

## **3.6 UNEXPECTED DISCOVERY PROCEDURE**

- 3.6.1. In the event that a grounded bat is encountered in the vicinity of building B5 during the construction phase, the work must stop immediately and the SQE must be informed. Operatives must not handle the bat, unless the animal is in absolute and immediate danger and you have been instructed to do so by the SQE.

### **3.7 MONITORING**

- 3.7.1. The SQE will attend Site at least once every two months during the construction period, to ensure that the protective Heras fencing around B5 remains in place, and to ensure that the mitigation measures set out in this document are complied with.

## 4 FIGURES

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**Figure 1 – Building Locations**

**Figure 2 - B5 Mitigation Strategy**