



DEPLOYMENT FORM SUPPORTING INFORMATION

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Document Control

Project Name: Phase 3B, Clarendon Road
Project Number: 6089
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Approvals

The signatures below certify that this plan has been reviewed and accepted, and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
Prepared by	J. Holliday		Snr. Rem. Scientist	14/10/2021
Reviewed by	Jack Holliday		Snr. Rem. Scientist	14/10/2021
Approved by	Tom Simpson		Technical Manager	

Amendment Record

This Supporting Information Form for Mobile Treatment Permit (MTP) deployment is reviewed to ensure its continuing relevance to the project. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date
NA	Original Issue	00	14/10/2021

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1. INTRODUCTION

- 1.1** Keltbray proposes to deploy mobile plant for the treatment of contaminated water at the development site known as Phase 3B, Clarendon Road Gasworks, Mary Nuener Road, N8 0JU (the 'Site'). Keltbray will be undertaking basement excavation works and dewatering of this excavation during construction may require treatment prior to disposal. Previous remediation works at the site were completed by Keltbray under deployment references CB3902KF/W0020 & W0026. A Site Layout Plan is included within **Appendix A**, indicating the specific area of the wider Site where Keltbray will operate to undertake the works detailed in this document (the 'Operating Site').
- 1.2** The Operating Site is located at National Grid reference TQ 30785 89866 (536501E, 178435N), covering approximately 2 hectares.
- 1.3** The Operating Site is proposed for redevelopment as a mixed residential led development. Keltbray will be constructing 2 large shared basements comprising blocks E1, E2, and E3 and block D4 respectively. Material will be excavated and removed from site without treatment, this deployment is for the treatment of any contaminated water prior to disposal to sewer.
- 1.4** Contaminants identified at the Operating Site include heavy metals, Total Petroleum Hydrocarbons (TPH), Polycyclic Aromatic Hydrocarbons (PAH), Volatile Organic Compounds (VOCs).
- 1.5** This document fulfils the requirements of the Deployment Form submitted to the Environment Agency (the 'Agency') as Stage 2 of the Environmental Permitting (EP) Regime. Information required to complete the Deployment Form has been transferred to this document. The Agency Proforma MPP2 is attached in **Appendix B**.
- 1.6** This document has been prepared by KR for the sole purpose described above and no extended duty of care to any third party is implied or offered. Third parties making reference to this report should consult KR to the extent to which the findings may be appropriate for their use.

2. LICENCE HOLDER

- 2.1 The license holder: Keltbray Environmental Material Management Limited
- 2.2 EP reference number: EPR/CB3902KF
- 2.3 Address details of licence holder:
 - i. St Andrews House, Portsmouth Road, Esher, KT10 9TA
 - ii. Contact name: Jack Holliday
 - iii. Office telephone number: 020 643 1000
 - iv. Mobile number: 07808 300749
 - v. Email: jack.holliday@keltbray.com
- 2.4 The Operating Site will be supervised by suitably qualified staff including a relevant WAMITAB licence holder. Details are provided in Section 5.4 below and in **Appendix C**.

3. THE OPERATING SITE

- 3.1.** Site plans can be found in **Appendix A** of this document. The site plans include the following details:
- i. Site boundary and Operating Site boundary;
 - ii. Security and access arrangements
 - iii. Areas of contaminated material, substances or products for remediation by the mobile plant;
 - iv. Location / siting of principal plant and equipment;
 - v. Process treatment and storage area;
 - vi. Proposed location of monitoring facilities; and
 - vii. Potential receptors (e.g. neighbouring residents)
- 3.2.** The site working hours are 08:00 to 18:00, Monday to Friday. In the event that there will be a requirement to work on Saturdays, the working hours will be 09:00 to 14:00. It is not anticipated that there will be any working undertaken out of the hours specified above.
- 3.3.** Site access will be through Mary Nuener Road. Security access will be provided by the Principle Contractor, St William LLP to effectively manage entry in and out of site and monitor contractors' attendance.
- 3.4.** The overall development site is secured by 2.4m hoarding, CCTV and a full time security presence.
- 3.5.** The site is not located within any other Environmental Permitted site, although it was the site of previous mobile treatment deployments by KR (Ref: CB3902KF/W0020 & W0026) during the previous phases of remediation.

4. PROTECTED SITES

4.1 The land uses in the area surrounding the Operating Site comprise the following:

North: Warehouses and commercial properties, future development phases.

East: Residential housing

West: Train depot and East Coast Main Line

South: Phase 2 of the development.

Refer to drawing in **Appendix A** for further details.

4.2 Information available on the Defra (Magic) website (ref; <http://magic.defra.gov.uk/MagicMap.aspx>, accessed on the 14/10/2021) indicates the site is within a zone 1 source protection zone.

4.3 The nearest surface watercourse is the New River located approximately 100m West across the East Coast Main Line. In addition to this the culverted Moselle Brook runs immediately to the south and east of the site.

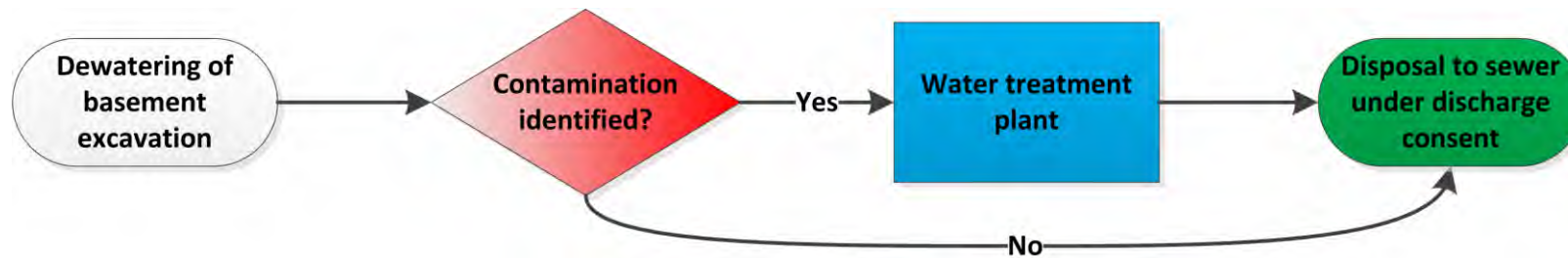
4.4 The Defra (Magic) website also indicates that there are no Ramsar sites, Special Areas of Conservation, Special Protection Areas, National Nature Reserves, Marine Nature Reserves, Areas of Special Protection for Birds, or any other potential sensitive statutory land-based designations are located within 2 km of the Operating Site.

5. MANAGEMENT SUPERVISION

- 5.1** The deployment is expected to last for up to 12 months, starting on **29/11/21**,
- 5.2** The following staff will be in attendance:
- i. Technically Competent Person (1 day during the setup of the treatment area and monthly visits);
 - ii. Project Manager (full time);
 - iii. Site Manager (full time);
 - iv. Foreman / supervisor(s) (full time);
 - v. Remediation Scientist / Assistant project manager (full time);
 - vi. Excavators, screeners, crushers and other plant operators (full time); and
 - vii. Labourers and banksman(s)
- 5.3** It is thought that a combination of the above will total between 20 to 30 personnel.
- 5.4** The named Technically Competent Persons (TCPs) for Keltbray Remediation sites are;
- Jack Holliday (Continuing Competence expires January 2022)
 - Tom Simpson (Continuing Competence expires December 2021)
 - Tim Ridley (Continuing Competence expires August 2023)
- 5.5** Keltbray are confident that due to competence of the site team and nature of the works, TCM visits can be limited to 1 day during the treatment area setup and monthly during the treatment activities without compromising the permitted activities.
- 5.6** A competent site management team will be onsite for the duration of the works. Their responsibilities include the environmental, compliance and materials, reporting the results and any findings to the KR technical team which includes TCM and located approximately 1hr to 1hr30 from site. The aforementioned project team structure alongside KR's Environmental Health Safety and Quality Management system (into which WAMITAB audits have been integrated) means the project manager and TCM are nearly immediately alerted to any non-compliances. In the event of a non-compliance the assigned TCM(s) will be able to action, provide advice to the site team or attend site if necessary.
- 5.7** Anticipated periodic breaks: **Sundays and Bank Holidays**

6. TREATMENT ACTIVITIES AND ACCEPTANCE PROCEDURES

6.1 Treatment Activity Summary Flow Diagram



Drawing A: Water Treatment Activities and Acceptance Procedures Summary Flow Diagram

6.2 Material Acceptance Procedures

Each stage of the treatment process (numbered below) will have the following controls in place to ensure those materials that are treatable with the specified technology are successfully treated.

a) Supervision by suitably qualified operatives

The input water will be supervised by a suitably qualified persons. A watching brief will be completed during earthworks in order to identify any potential areas of contamination and identify the required treatment for all contaminated water.

b) Segregation and Quarantine

Any material identified as unsuitable for treatment will be segregated and quarantined pending and assessed for treatability.

6.3 Permitted Technologies

a) Water Treatment

Due to the past uses of the site it is expected that contaminated groundwater may be encountered. This will be removed to allow excavation to progress. Encountered groundwater will be assessed against the discharge criteria and if requiring treatment will be passed through on site water treatment plant.

The schematic below shows the potential set up of the plant however this will be adapted to optimally treat the contamination encountered in the water.

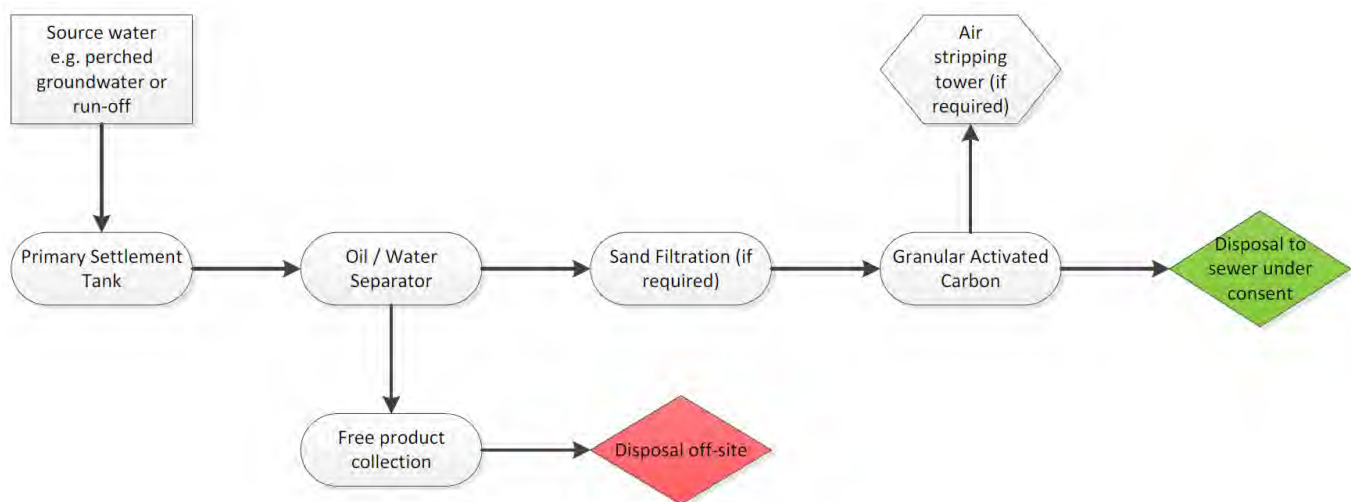


Diagram B: Proposed water treatment system layout

6.4 Commissioning, Operating and Maintenance

The first week of operations will be treated as an enabling period. During this time additional sampling will be undertaken to monitor the effectiveness of the deployed treatment plant. Periodic samples will be taken to ensure the continued quality of the treatment and compliance with the discharge criteria.

6.5 Quantity Measurement Systems

A calibrated mechanical flow meter will be used to measure discharged volumes.

6.6 Other Keltbray Activities

Permitted activities relate only to the treatment of contaminated water from the dewatering of the basement excavations. Keltbray are also contracted to construct piled basement walls, excavate the basement structure and dispose of excavated soils. These works are outside the scope of this permit deployment.

7. WASTE TYPES AND QUANTITIES

7.1. The following table lists the waste types and quantities including the six-digit code from the European Waste Catalogue (EWC) that will be treated at the Operating Site:

Table 1: Waste Types and Quantities

Waste type	EWC six-digit code	Quantity (m ³)	Medium (solid, water, sludge, gas)
Water removed from excavations (hazardous)	19 13 07	Anticipated Maximum: 5,000	Liquid
Water removed from excavations	19 13 08	Anticipated Maximum: 20,000	Liquid

7.2. To allow for the situation where waste quantities exceed those estimated the following procedures will be in place:

- I. Accurate recording of all waste quantities treated;
- II. Any excess volumes of treatable waste to be predicted in good time; and
- III. Inform the Agency as soon as is reasonably practicable to request any modifications to the estimated quantity of treated material detailed in the Deployment Form.

7.3. As treated material are to be disposed of to sewer a waste transfer note will not be applicable for this disposal.

8. CONCEPTUAL SITE MODEL

The potential source-pathway-receptor linkages have been identified based on the expected ground conditions and receptors surrounding the Operating Site, as detailed in **Table 2** below.

Table 2: Conceptual Site Model for permitted operation

Source The agent or process with potential to cause harm	Receptor What is at risk? What do I wish to protect?	Harm The harmful consequences if things go wrong	Pathway How the receptor might come into contact with the source	Probability of exposure Severity of the consequences if this occurs	Risk on the receptor	Risk Management How can I best manage the risk to reduce the magnitude	Residual Risk Magnitude of the risk after management
Noise from machines	Site workers; neighbouring site users	Health problems; disturbance of residents	Machine noise level exceed the appropriate H&S levels	Medium	Effect on human health; time and cost implications for the project	Monitoring PPE (site workers) Ensure machines are placed away from sensitive boundaries where possible. Only work during agreed hours of operations	Low
Potential fuel leaks and spillages	Site workers; neighbouring site users; environment	Health problems; environmental damage	Direct ingestion, inhalation and / or dermal contact; vertical and lateral migration within the ground	Low	Effect on human health and environmental damage	Perform appropriate investigation and remediation in response to the spill, including deploying spill kit immediately. PPE (site workers) Monitoring	Low
Contaminated Water	Site workers; environment; sewer	Health problems; environmental damage	Leaks and spills; disposal of uncompliant water to sewer; direct contact with water for treatment	Medium / high	Effect on human health and environmental damage; contamination of soil and groundwater	Bunding of plant; suitable system of work; PPE; sampling and monitoring of discharge.	Low

9 RISK ASSESSMENT

- 9.1** The following potential source-pathway-receptor linkages have been identified from the expected conditions and surrounding receptors to the Operating Site.
- 9.2** Sources – the potential sources at the Operating Site in relation to the water treatment area include:
- i. Storage and treatment;
 - ii. Piping of water around site;
 - iii. Potential fuel leaks / spillages; and
 - iv. Contaminated Water
- 9.3** Pathways – the potential pathways include release mechanisms such as:
- i. Inhalation:
 - i. Volatile emissions from groundwater
 - ii. Indigestion:
 - i. Direct
 - iii. Dermal:
 - i. Direct contact with contaminated water
 - iv. Noise;
- 9.4** Receptors – receptors principally include:
- i. Site employees and visitors; and
 - ii. Neighbouring site users.
- 9.5** The nearest human receptors are site construction staff, residents / staff / visitors at properties in the vicinity of the site.
- 9.6** On-site human receptors include all operatives and office staff, including visiting drivers, contractors and regulators.
- 9.7** The main potential environmental receptors are the culverted Moselle Brook located along the eastern boundary of site along with the groundwater unit below the site.
- 9.8** In the context of a secure construction site the potential human exposure routes to receptors are:
- i. Air inhalation – respiratory inhalation of vapours and gases;
 - ii. Dermal contact – skin contact with contaminated water

10. EMISSION CONTROL

Remedial works set out in this deployment application will form part of a wider enabling/engineering phase of works. As such a detailed noise, dust and vibration monitoring plan has been prepared to effectively minimise the effects on surrounding receptors and reduce the risk of environmental nuisance on the adjacent neighbours. The monitoring plan for the site is included in **Appendix D**.

10.1 Dust Control

The abatement of dust generated during the site works will be achieved by the dampening of soil by spraying water onto the stockpiled materials to be treated. Roadways within the site will be kept damp by water bowser. Additionally, the drop distance from excavator bucket to stockpile / process plant will be kept as short as reasonably practicable.

An initial baseline dataset of local atmospheric dust conditions will be collected to establish background environmental conditions prior to the start of the works.

In the event that dust generation exceeds site trigger values during the remediation works, greater efforts will be made to keep dust levels to a minimum. These will include:

- i. Increased damping down;
- ii. Review of housekeeping methods and work practices; and
- iii. Site manager to enforce dust abatement measures more rigorously and ensure staff at the Operating Site take heed;
- iv. Reduction of operation on site to limit dust generation.

Note: Additional construction and enabling activities will be ongoing during the treatment works, emissions from these activities will be able to be distinguished from the treatment activities.

10.2 Odours / VOCs

Where any potential nuisance odours are detected, abatement measures will be applied. Measures to control odours will include:

- i. Contained plant and sealed treatment units;
- ii. Prompt treatment / removal of contaminated soils and waters; and
- iii. Odour suppression units.

Should handheld PID's detect any ambient VOC concentrations in excess of 1 ppm then the Site operation will be temporarily suspended and the working method reviewed. VOC abatement will take the form of covering stockpiles with non-VOC contaminated soil, plastic sheeting or the application of VOC suppressant spray.

10.3 Noise

Throughout the duration of works at the Site, measures will be implemented and maintained to control noise. Noise will be monitored as outlined in Section 11. An initial baseline will be undertaken to establish thresholds levels prior to the start of the works. The main receptors to noise will be the operatives at the Site and as such the emphasis of noise protection will be focused at on-site areas.

All plant will be operated in accordance with manufacturer's instructions to minimise noise generation and ear protection will be worn in accordance with the machinery operating instructions. Monitoring will be undertaken at the boundary positions **Appendix A** throughout the works.

Note: Additional construction and enabling activities will be ongoing during the treatment works, emissions from these activities will not likely be able to be distinguished from the treatment activities.

10.4 Vibration

Given the specific features of the site and its's surrounding, with respect to the treatment activities, it is not thought that vibrations to the outside environment from the treatment works will have a significant impact.

11. EMISSIONS MONITORING PLAN

11.1 Monitoring Programme

Keltbray are responsible for the monitoring of environmental impacts where remedial activities are to be carried out. Continuous automated monitoring will be completed at a two fixed EMS locations as well as daily monitoring along the 4 boundaries. EMS locations shown in **Appendix A**.

11.2 Baseline Monitoring Programme

Baseline monitoring will be carried out prior to commencement of works for the following environmental issues:

- i. Dust;
- ii. Odour / VOCs;
- iii. Noise; and
- iv. Vibration

11.2.1 Dust (Air Quality)

Air quality will be monitored using automated equipment capable of notifying exceedances in real time. The units will establish PM10 and other variables. The use of a weather station will assist with understanding the wind speed and directions while works are ongoing.

The dust monitors will record PM10 1 Hour average and the trigger value will be set at 190 mg/m³, in accordance with the guidelines given in the '*Guidance on Monitoring in the Vicinity of Demolition and Construction Sites*' published by IAQM in October 2018.

- Review of site conditions, works activities, control measures and other potential external factors (ie: pollen deposition, dust originating from adjacent sites etc.);
- A change of working procedures will be assessed and implemented to further reduce dust/fibre emissions, with dust/fibre suppression measures repeated until monitoring confirms working conditions to have returned below Trigger levels and that amended procedures are deemed sufficient;
- If necessary, the frequency of reassurance air testing shall increase following the exceedance event until such time additional control measures are proven effective and no further testing is anticipated to exceed Trigger levels;
- Optional: Elevated sample(s) to be sent for SEM analysis to review the nature of the fibres identified.

11.2.2 Noise Monitoring

Real-time noise monitoring will be undertaken at the proposed locations, using Class 1 sound level meters. KR trigger values set out for noise will act as a limit any exceedances will involve a review of activity and potential mitigation action deployed. The trigger levels are site specific and will be in line with Local Authority and as outlined in the Section 61 Consent.

The source of noise will be recorded and impact assessment reviewed if noise level are identified above 5dB above baseline noise records.

11.2.3 Odours / VOCs Monitoring

Odours will be assessed on an olfactory basis by daily inspections of the four site boundaries. VOC emissions will be monitored using real time PID VOC monitors within the two fixed EMS locations. Triggers of 1 ppm will be used and if exceeded working practices reviewed and control measures adjusted.

12. REPORTING OF MONITORING RESULTS

12.1 All data from monitoring activities will be recorded and communicated on an agreed monthly reporting period and included on the Mobile Treatment Permit Folder. Monitoring results will be available to the Agency on request.

12.2 Daily and weekly qualitative and quantitative monitoring sheets are included in **Appendix D**.

APPENDIX A

Figures



- NOTES:
1. This drawing is to be read in conjunction with all relevant engineer's drawings, architect's drawings and specifications.
 2. For setting out information, refer to the relevant architect's drawing.
 3. All elevations and levels are in metres and are related to Ordnance Datum (O.D.). All dimensions are in metres unless noted otherwise.
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KEY

← Site location

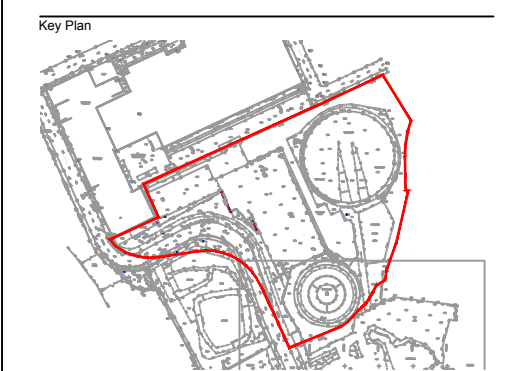
P01	10.07.2019	MZ	10.07.2019	MP
FIRST FOR REVIEW				
Rev	Date	By	Chkd	Appd

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Project Title
CLARENDON GASWORKS PHASE 3



Drawing Title
SITE LOCATION PLAN

Scale at A3	NTS
Role	X - SUBCONTRACTOR
Suitability	D2 - FOR TENDER
Keltbray Remediation Job No	Rev
T6445	P01
Name	CG3-KRE-X-000-XX-M2-CE-0011
Phase - Originator - Role - Zone - Level - Type - Element - Number	



Drawing Control			
This drawing is based on the following source information			
Component	Company	Drwg/Model Ref.	Date/Issue
TOPOGRAPHICAL SURVEY	CD SURVEYS LTD	SW/1807018	08.2018

- NOTES:
1. This drawing is to be read in conjunction with all relevant engineer's drawings, architect's drawings and specifications.
 2. For setting out information, refer to the relevant architect's drawing.
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- KEY
- Site boundary
 - Residential
 - Other construction phases
 - Commercial
 - Railway

P01	28.10.2019	MZ	28.10.2019	JH
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FIRST FOR REVIEW

Rev	Date	By	Chkd	Appd
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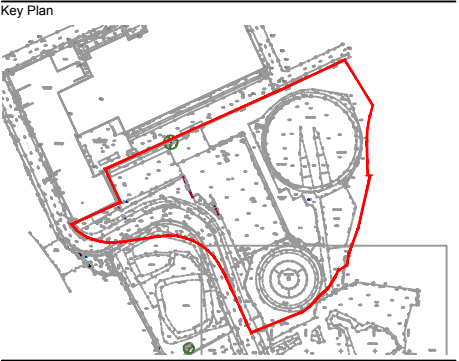


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Project Title
CLARENDON GASWORKS PHASE 3



Drawing Title
SITE SURROUNDING RECEPTORS

Scale at A3
1:1000

Role
X - SUBCONTRACTOR

Suitability
D2 - FOR TENDER

Keltbray Remediation Job No	Rev
T6445	P01

Name
CG3-KRE-X-000-XX-M2-CE-0013
Phase - Originator - Role - Zone - Level - Type - Element - Number

A3

A B C D E F G H I J

1

2

3

4

5

6

7

8

9

10



Drawing Control			
This drawing is based on the following source information			
Component	Company	Drwg/Model Ref.	Date/Issue
TOPOGRAPHICAL SURVEY	CD SURVEYS LTD	SW/1807018	08.2018

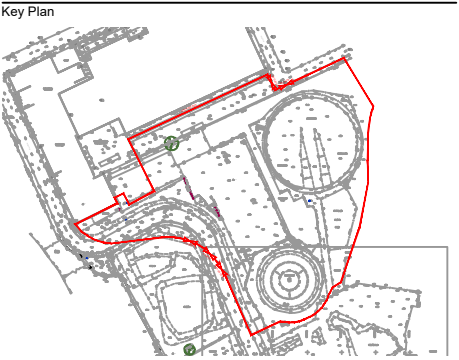
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P03	08.10.2021	WH	08.10.2021	WH
UPDATED SITE BOUNDARY				
P02	05.02.2020	MZ	05.02.2020	JH
EMS ADDED				
P01	11.11.2019	MZ	11.11.2019	JH
FIRST FOR REVIEW				
Rev	Date	By	Chkd	Appd

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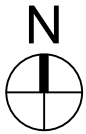
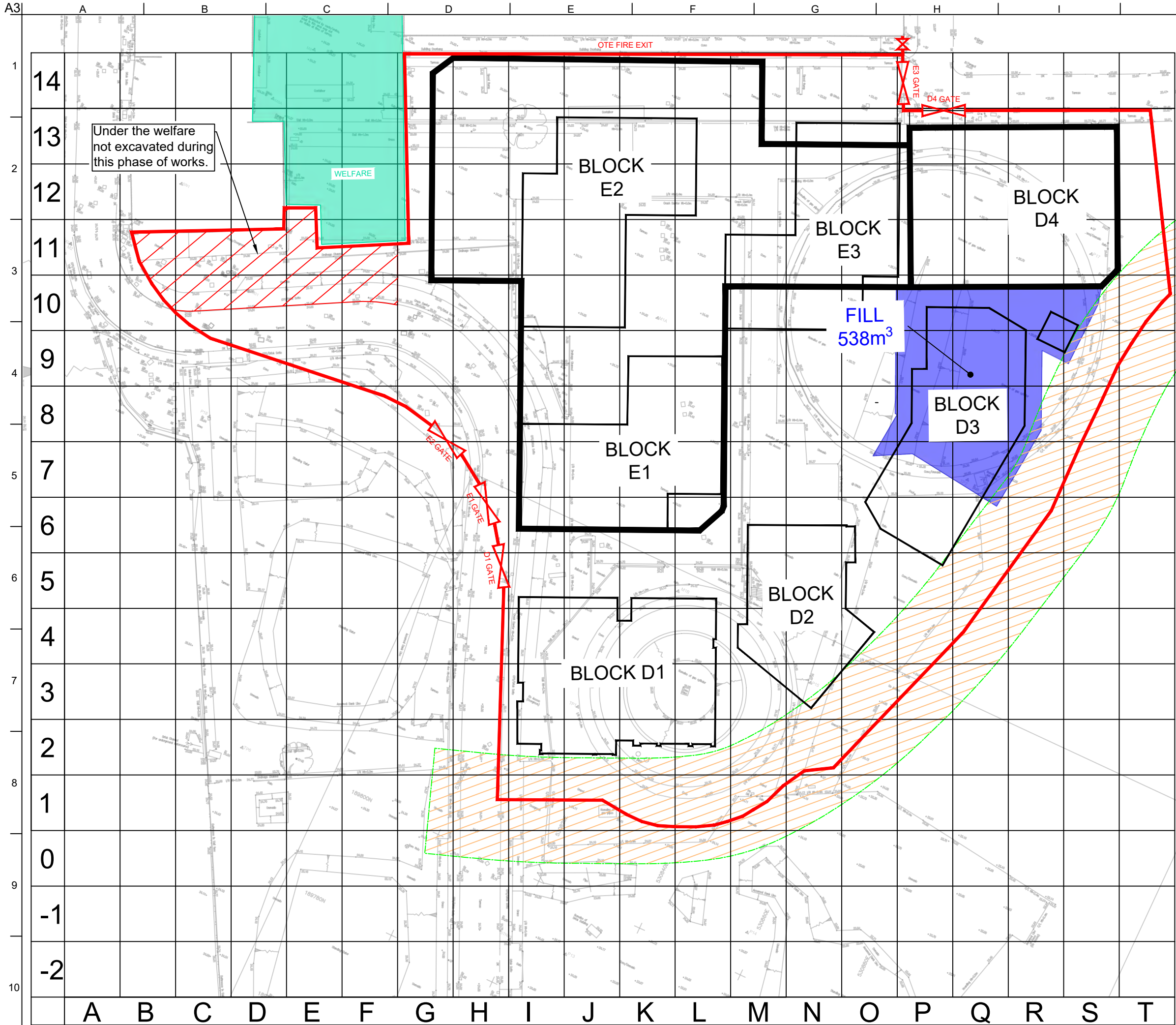
Project Title
CLARENDON GASWORKS PHASE 3



Drawing Title
ENVIRONMENTAL MONITORING STATIONS AND INDICATIVE WORK LOCATIONS

Scale at A3 1:1000	
Role X - SUBCONTRACTOR	
Suitability D2 - FOR TENDER	
Keltbray Remediation Job No T6445	Rev P03
Name CG3-KRE-X-000-XX-M2-CE-0012 Phase - Originator - Role - Zone - Level - Type - Element - Number	

KEY	
	Site boundary
	Environmental monitoring stations
	Indicative location of water treatment plant



- NOTES:
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 4. All dimensions are in metres unless noted otherwise.
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 6. The contractor shall be responsible for the design, build and temporary works. They shall provide all temporary works during construction.
 7. Specific temporary works constraints arising from the permanent works design, if and where applicable, are noted on the Keltbray Remediation drawings to which they relate.
 8. Any discrepancies in the information provided should be immediately reported to the Engineer prior to the commencement of work.

P01	21.09.2021	WH	21.09.2021	JH
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FIRST FOR ISSUE

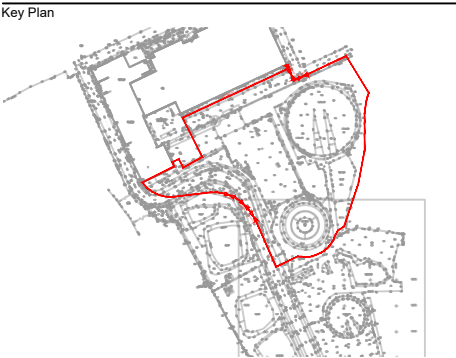
Rev	Date	By	Chkd	Appd
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Project Title
CLARENDON ROAD PHASE 3B



Drawing Title
MATERIAL MOVEMENTS PLAN

Scale at A3
NTS

Role
X - SUBCONTRACTOR

Suitability
S2 - FOR INFORMATION

Keltbray Remediation Job No	Rev
6089	P01

Keltbray Name
CR3B-KRE-X-000-XX-DR-CE-2001
Phase - Originator - Role - Zone - Level - Type - Element - Number

St. William Name
N/A