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Your Ref:
Our Ref: RMC/Aug/23/01/P/rc/RemedVerification/Final1

21st March 2024

White Lion Estates Limited
9 White Lion Street
London
N1 9PD

Dear Sirs,

Re: 72-80 Leather Lane, and 82 Leather Lane London EC1N 7TR – Discharge of Planning Condition 10 (Planning Application 2019/2939/P) – Remediation Verification

We write further to our instruction from Concept Construction Consultants Ltd (email from James Prestedge dated 10th October 2022), to undertake remediation verification works during and towards the end of refurbishment works being undertaken on Nos. 72-80 and 82 Leather Lane London EC1N 7TR. These remediation verification works, which were recommended in the Cameron Environmental Remedial Strategy Letter-report Ref: RMC/Apr/19/03/P/rc/RemedStrat/Final, dated 25th October 2019, were proposed to comprise the following:

- Inspection of the completed refurbishment works (particularly within former Units 3, 10 and 12), prior to occupation, particularly where re-plastering and drywall plaster-boarding of the walls and screeding of the floors in affected areas of these former Jewellery Units to confirm this has been carried out;
- Undertaking of verification dust swab sampling, particularly within areas of the former Jewellery Units. Samples to also be recovered from surfaces in other Units previously used for residential and other non-jewellery related commercial purposes. The results of this sampling to be compared against the results obtained prior to refurbishment works;
- For 'Duty-of-Care' purposes, a review of waste removal documentation generated to ensure that building fabric materials removed off site during refurbishment works have been taken to a suitably licensed facility for appropriate treatment, reuse or disposal;
- The findings of this further inspection and dust swab sampling and analyses will be presented in a Verification Letter-report, (current Letter-report) together with conclusions, and where necessary, any further recommendations.

The requirement for remediation verification, was Conditioned as part of Planning Condition 10. In Item 1 of a Letter issued by London Borough of Camden (LBC), Ref: 2019/2939/P, dated 3rd December 2019, to Concept Construction Consultants, it was indicated that LBC Granted partial discharge of Condition 10, and in relation to the verification of remedial works carried out requested that:

“These recommendations and testing results should be carried out on site and confirmation, summarised in a Validation Report, submitted to the LPA for approval to demonstrate the remedial work has been undertaken as specified. The validation report is needed for LPA to approval before the condition can be discharged in its entirety. The development may not be occupied until this has occurred.”

1.0 Background

It is understood that the proposed works at the existing premises of 72-80 Leather Lane and 82 Leather Lane were to essentially comprise:

- Demolition of existing roof and erection of a two-storey rooftop extension, in order to create 4 (No.) additional residential units (Class C3);
- Infilling of existing light-wells;
- Internal reconfiguration; and
- Shopfront restoration.

In support of these works, a Phase 1 Desk Study and walkover survey of the site was carried out by Cameron Environmental for Hatton Garden Properties Limited in 2016. At the time of this 2016 walkover survey, the buildings, which consisted of 6 (No.) storeys, plus basement, remained occupied by jewellery workshops, other commercial studio usage and residential apartments, with the ground-level frontage being occupied by retail premises. The following jewellery workshops were noted to be operating at the time of the walkover survey:

- Unit 3 – FOS Jewellery;
- Unit 10 – City Gold Plating;
- Unit 12 – (located in the basement) - Ironforge Ltd.

The findings of the Phase 1 Desk Study and walkover survey of the site were presented in Cameron Environmental Ltd Report entitled: Phase 1 Desk Study walkover Survey and Environmental Risk Assessment 72-80 Leather Lane, London, EC1N 7TR, Ref: RMC/Aug/16/01/P/Phase1/Final/rc, dated November 2016.

Following on from recommendations presented in the Cameron Environmental Ltd November 2016 Report, a sampling exercise and risk assessment of dust deposited within the fabric of the above noted premises, prior to refurbishment works being undertaken under Planning Application 2019/0187/P was subsequently undertaken by Cameron Environmental in April 2019, the findings of which were presented in a Letter-report Ref: RMC/Apr/19/03/P/rc, dated 27th May 2019. This survey indicated:

- Slightly elevated, to trace concentrations of arsenic, boron, copper, lead and zinc, in dust swab samples recovered from the above three jewellery workshops. Concentrations of other toxic metals and metalloids analysed were found to be generally below their respective laboratory detection limits;
- With the exception of a swab sample recovered from Unit 11, all dust swabs recovered from other areas of Buildings 72-80 Leather Lane, and 82 Leather Lane were found to contain concentrations of toxic and phytotoxic metals and metalloids tested, below their respective laboratory detection limits. In the case of Sample 4 (Unit 11), a trace concentration of lead was determined.

Subsequently, and based upon the findings of this sampling exercise and risk assessment, a Remedial Strategy Letter-report (as indicated above) was prepared by Cameron Environmental, Ref: RMC/Apr/19/03/P/rc/RemedStrat/Final, dated 25th October 2019.

It is recommended that the current Letter-report is read in conjunction with the above-noted Report and Letter-reports.

2.0 Remediation Verification Works

2.1 Dust Assessment

2.1.1 Sampling Methodology

In order to carry out these verification works, it was proposed that dust swab samples should be taken, employing the same methodology as previously utilised from interior surfaces within representative rooms within each floor of the refurbished buildings. This would consist of cotton-wool swabs, which would then be placed in sealed labelled containers pending delivery to a chemical analytical laboratory. To standardize the assessment, each cotton-wool swab, which was of an approximately identical size and mass, was used, in each case, to recover accumulated dust from across an accurately marked surface area of 20cm by 10cm (200cm²). This then allowed direct, albeit qualitative, comparison of the presence and relative concentrations of different contaminants present in the dusts, thereby enabling an assessment to be undertaken of the effectiveness of the remedial works carried out as part of the building refurbishment activities. A reference sample was also to be recovered from an external area of the Building (Upper Fifth Floor).

Sample Blanks were also to be analysed to discount any contribution of these contaminants from the carrier matrix and laboratory reagents.

It was proposed that the test results obtained for the refurbished rooms/rooms undergoing refurbishment, would then be compared against the earlier (2019) results obtained prior to commencement of remedial and refurbishment works, as well as Blank and Reference samples.

As indicated above, the results obtained could not be considered to be quantitatively representative, but would provide a qualitative indication of the nature and presence of those contaminants determined, and the effectiveness of the remedial works carried out particularly within the former jewellery workshop Units.

In order to carry out this verification testing, swab samples were recovered from 72-80 Leather Lane, and 82 Leather Lane on 10th August 2023.

In total, fourteen swab samples were again recovered from the following locations, and each subsequently analysed for the same suite, as previously, and by the same laboratory as previously utilised:

Swab Sample ID	Location of Recovery
Sample 1	Upper Basement
Sample 2	Ground
Sample 3	Upper Ground
Sample 4	Upper Ground Floor
Sample 5	First Floor
Sample 6	Upper First Floor
Sample 7	Second Floor
Sample 8	Upper Second Floor
Sample 9	Third Floor
Sample 10	Upper Third Floor
Sample 11	Fourth Floor
Sample 12	Upper Fourth Floor
Sample 13	Fifth Floor
Sample 14	Upper Fifth Floor (taken outside as Background Reference Sample)
Sample Blank 1	-
Sample Blank 2	-

2.1.2 Findings of Dust Contamination Testing

Upon review of the results (provided in Appendix 1 of the current Letter-report) there was noted to be a reduction, to significant reduction in the maximum concentrations of arsenic, barium, boron, copper, lead and zinc determined in the swab samples compared to the earlier swabs recovered prior to commencement of refurbishment/remedial works. Generally, results obtained on the 10th August 2023 sampling exercise were at or near laboratory detection limits, although some concentrations of arsenic, barium, boron, copper, lead and zinc were found at concentrations above detection limits, particularly in Sample 1 recovered from Upper Basement. However, it is understood that refurbishment/remedial works had not been undertaken in this part of the Building.

In the Background Reference Sample recovered from the Upper Fifth Floor, concentrations of copper, barium, lead and zinc were all slightly lower compared to concentrations determined in other swab samples recovered, suggesting, as may be expected, that some residual very low-level impact from these metals potentially derived from the former jewellery workshop activities, remained.

2.2 Review of Waste Removal Documentation

A copy of the Site Waste Management Plan (SWMP) for the site, entitled: Site Waste Management Plan (SWMP) Extension and Refurbishment Works at 72-80 Leather Lane, Ref: V.03 dated 05.01.2024, was provided by Evans & Co Limited who are the Principal Contractor for this refurbishment project on 72-80 Leather Lane. It is indicated that materials removed off site for recycling or disposal were to include:

- Plasterboard;
- Brick/block;
- Metal;
- Concrete.

Supplied details in the latest Site Waste Management Plan (SWMP) Extension and Refurbishment Works at 72-80 Leather Lane, Ref: V.03, dated; 05.01.2024, indicated the waste streams generated over a period from 09/08/20 to 19/12/23. In summary, this was as follows:

Waste Type	Waste Management Contractor	Waste Acceptance Site	Waste Management License No.
Mixed Construction Wastes	RMS Group	7-10 Penhall Rd, SE7 8RX	CBDU149396
Mixed Soil	RMS Group	7-10 Penhall Rd, SE7 8RX	CBDU149396
Steel	Copia Metals & Waste	7-10 Penhall Rd, SE7 8RX	CBDU117809

Apart from more superficial surfacing to walls and floors, it is considered that these materials (particularly the mixed construction wastes) would have contained the most adsorbed dust, potentially containing slightly elevated concentrations of toxic and phytotoxic metals and metalloids.

It is understood that most of these above-noted materials have now been removed off-site and have been classified as Non-hazardous wastes for disposal purposes.

However, this does not include any known asbestos containing materials (ACMs), and the presence and impacts of any asbestos fibres or asbestos containing materials (ACMs) has not been considered as part of the current assessment, as it is understood that this has been tested and risk-assessed by others.

3.0 Updated Conceptual Site Model (CSM)

3.1 Contaminant Source and Nature

As previously concluded, it was considered that the metals determined in the dust swab samples analysed were consistent with those likely to have been utilised at the site as part of the former jewellery works

activities, with, following the remedial works, the most consistently slightly elevated concentrations determined being for zinc, which is less zootoxic than some of the other metals and metalloids determined, which were less ubiquitous and generally found to be either absent, or present at lower concentrations than zinc.

As very low to negligible concentrations of the toxic and phytotoxic metals and metalloids analysed in the dust swabs tested were encountered within all of the refurbished rooms in these buildings (with the possible exception of the Basement area), it is therefore considered that on the basis of these swab testing results, the refurbished rooms now show little evidence of being affected by residual dusts released from the former Jewellery Workshops.

3.2 Contaminant Pathways

Where residual dusts remain on surfaces, or are remobilised from confined spaces, following completion of works, then there is a potential that these may represent an exposure risk to future site residents and users through dermal contact, as well as inhalation and potentially ingestion pathways.

However, based upon the test results obtained, it is considered that the metal and metalloid contaminants tested for in residual dusts sampled within the buildings during and upon near completion of refurbishment works, do not represent a significant risk to future site users and residents.

3.3 Contaminant Receptors

It is considered that the future principal Receptors to any remaining residual contaminants are likely to be future site users/workers (where jewellery workshops are re-established in the building), and future site visitors and especially new residents.

However, a more chronic exposure of future site users and residents to dusts generated from surface fragmenting of wall plasters and floor screeds and from accumulation in confined areas over the years of Jewellery Workshop activity is considered unlikely to be significant, and essentially negligible now, given the replacement of much of the original wall surfacing and provision of new flooring or screeding of any existing surfaces, which will thereby break these potential future exposure pathways.

In particular, it is noted that in the former jewellery workshops, plaster has been largely removed and/or plasterboard placed over original walls, so any risks posed by ingestion or inhalation exposure to residual elevated concentrations of toxic metals, such as the elevated lead concentration previously recorded in wall plaster such as in former Unit 3 (former FOS Jewellery Workshop), should now be essentially negligible.

The risk associated with contaminated fugitive dust release associated with previous Jewellery Workshop activities within the building, to the wider environment, which was also previously considered to be a viable Receptor, is also now considered to be negligible, given the remedial works now largely carried out.

4.0 Conclusions

As with the findings of the sampling carried out in 2019, the metals determined in highest concentrations in the dust swab samples recently analysed are consistent with those likely to have been utilised at the site as part of the former jewellery works activities. However, there were notable significant reductions in the maximum concentrations of arsenic, barium, boron, copper, lead and zinc determined in the swab samples compared to the earlier swabs recovered prior to commencement of refurbishment/remedial works, with results obtained from the post remedial/refurbishment sampling exercise, with values generally at or near laboratory detection limits and/or ambient background concentrations. However, some concentrations of arsenic, barium, boron, copper, lead and zinc were found at concentrations above detection limits, particularly in the Upper Basement area.

On the basis of the results obtained and the observed refurbishment works carried out, it is considered that concentrations of the residual metals and metalloids present in remaining dusts within these building should be sufficiently low to allow safe occupancy by future site residents and usage by future site workers.

It is also considered that these findings also demonstrate that the remedial works within these buildings have been undertaken as specified, and should now facilitate the complete discharge of Condition 10 of Planning Ref: 2019/2939/P.

I trust that these findings and associated comments and conclusions are acceptable, however please feel free to contact us, should you wish to discuss any of these issues further.

Yours sincerely,

A handwritten signature in black ink that reads "Ross Cameron". The signature is written in a cursive style with a large, stylized 'R' and 'C'.

Ross Cameron

APPENDIX 1

Laboratory Chemical Analytical Results of Dust Swab Samples
Recovered on 10th August 2023



Ross Cameron
R M Cameron Environmental Services Ltd
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Derwentside Environmental Testing Services Ltd
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t: 01622 850410

DETS Report No: 23-10530

Site Reference: 72 - 80 Leather Lane
Project / Job Ref: RMC/Aug/23/01/P/rc
Order No: None Supplied
Sample Receipt Date: 16/08/2023
Sample Scheduled Date: 16/08/2023
Report Issue Number: 1
Reporting Date: 22/08/2023

Authorised by:

A handwritten signature in black ink, appearing to read 'D Ashworth', is written over a light blue horizontal line.

Dave Ashworth
Technical Manager

Dates of laboratory activities for each tested analyte are available upon request.

Opinions and interpretations are outside the laboratory's scope of ISO 17025 accreditation. This certificate is issued in accordance with the accreditation requirements of the United Kingdom Accreditation Service. The results reported herein relate only to the material supplied to the laboratory. This certificate shall not be reproduced except in full, without the prior written approval of the laboratory.



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Wipe Analysis Certificate						
DETS Report No: 23-10530	Date Sampled	10/08/23	10/08/23	10/08/23	10/08/23	10/08/23
R M Cameron Environmental Services Ltd	Time Sampled	1210	1220	1230	1430	1240
Site Reference: 72 - 80 Leather Lane	TP / BH No	Upper Basement	Ground	Upper Ground	1st floor	Upper 1st Floor
Project / Job Ref: RMC/Aug/23/01/P/rc	Additional Refs	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied
Order No: None Supplied	Depth (m)	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied
Reporting Date: 22/08/2023	DETS Sample No	669953	669954	669955	669956	669957

Determinand	Unit	RL	Accreditation					
Arsenic (As)	ug/wipe	< 2	NONE	< 2	< 2	< 2	< 2	< 2
Barium (Ba)	ug/wipe	< 5	NONE	41	17	< 5	< 5	< 5
Beryllium (Be)	ug/wipe	< 0.5	NONE	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
Boron (B)	ug/wipe	< 1	NONE	8	< 1	< 1	< 1	< 1
Cadmium (Cd)	ug/wipe	< 0.2	NONE	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Chromium (Cr)	ug/wipe	< 2	NONE	6	< 2	< 2	< 2	< 2
Copper (Cu)	ug/wipe	< 4	NONE	29	< 4	< 4	< 4	< 4
Lead (Pb)	ug/wipe	< 1	NONE	32	< 1	< 1	2	< 1
Mercury (Hg)	ug/wipe	< 1	NONE	< 1	< 1	< 1	< 1	< 1
Nickel (Ni)	ug/wipe	< 3	NONE	5	< 3	< 3	< 3	< 3
Selenium (Se)	ug/wipe	< 3	NONE	< 3	< 3	< 3	< 3	< 3
Vanadium (V)	ug/wipe	< 2	NONE	11	4	< 2	< 2	< 2
Zinc (Zn)	ug/wipe	< 3	NONE	119	9	< 3	4	5



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Wipe Analysis Certificate						
DETS Report No: 23-10530	Date Sampled	10/08/23	10/08/23	10/08/23	10/08/23	10/08/23
R M Cameron Environmental Services Ltd	Time Sampled	1250	1300	1310	1320	1340
Site Reference: 72 - 80 Leather Lane	TP / BH No	2nd Floor	Upper 2nd Floor	3rd Floor	Upper 3rd Floor	4th Floor
Project / Job Ref: RMC/Aug/23/01/P/rc	Additional Refs	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied
Order No: None Supplied	Depth (m)	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied
Reporting Date: 22/08/2023	DETS Sample No	669958	669959	669960	669961	669962

Determinand	Unit	RL	Accreditation						
Arsenic (As)	ug/wipe	< 2	NONE	< 2	< 2	< 2	< 2	< 2	< 2
Barium (Ba)	ug/wipe	< 5	NONE	< 5	< 5	11	7	< 5	< 5
Beryllium (Be)	ug/wipe	< 0.5	NONE	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
Boron (B)	ug/wipe	< 1	NONE	1	6	2	2	< 1	< 1
Cadmium (Cd)	ug/wipe	< 0.2	NONE	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Chromium (Cr)	ug/wipe	< 2	NONE	< 2	< 2	< 2	< 2	< 2	< 2
Copper (Cu)	ug/wipe	< 4	NONE	11	< 4	< 4	4	< 4	< 4
Lead (Pb)	ug/wipe	< 1	NONE	4	1	5	5	1	1
Mercury (Hg)	ug/wipe	< 1	NONE	< 1	< 1	< 1	< 1	< 1	< 1
Nickel (Ni)	ug/wipe	< 3	NONE	< 3	< 3	< 3	< 3	< 3	< 3
Selenium (Se)	ug/wipe	< 3	NONE	< 3	< 3	< 3	< 3	< 3	< 3
Vanadium (V)	ug/wipe	< 2	NONE	< 2	< 2	< 2	< 2	< 2	< 2
Zinc (Zn)	ug/wipe	< 3	NONE	16	5	56	37	4	4



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Wipe Analysis Certificate					
DETS Report No: 23-10530	Date Sampled	10/08/23	10/08/23	10/08/23	10/08/23
R M Cameron Environmental Services Ltd	Time Sampled	1350	1140	1410	1420
Site Reference: 72 - 80 Leather Lane	TP / BH No	Upper 4th Floor	5th Floor	Upper 5th Floor	Sample Blank
Project / Job Ref: RMC/Aug/23/01/P/rc	Additional Refs	None Supplied	None Supplied	None Supplied	None Supplied
Order No: None Supplied	Depth (m)	None Supplied	None Supplied	None Supplied	None Supplied
Reporting Date: 22/08/2023	DETS Sample No	669963	669964	669965	669966

Determinand	Unit	RL	Accreditation					
Arsenic (As)	ug/wipe	< 2	NONE	< 2	< 2	< 2	< 2	< 2
Barium (Ba)	ug/wipe	< 5	NONE	< 5	23	< 5	< 5	< 5
Beryllium (Be)	ug/wipe	< 0.5	NONE	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
Boron (B)	ug/wipe	< 1	NONE	< 1	2	1	< 1	< 1
Cadmium (Cd)	ug/wipe	< 0.2	NONE	< 0.2	< 0.2	< 0.2	< 0.2	0.2
Chromium (Cr)	ug/wipe	< 2	NONE	< 2	< 2	< 2	< 2	7
Copper (Cu)	ug/wipe	< 4	NONE	< 4	< 4	< 4	< 4	< 4
Lead (Pb)	ug/wipe	< 1	NONE	< 1	2	5	< 1	31
Mercury (Hg)	ug/wipe	< 1	NONE	< 1	< 1	< 1	< 1	< 1
Nickel (Ni)	ug/wipe	< 3	NONE	< 3	< 3	< 3	< 3	6
Selenium (Se)	ug/wipe	< 3	NONE	< 3	< 3	< 3	< 3	< 3
Vanadium (V)	ug/wipe	< 2	NONE	< 2	< 2	< 2	< 2	< 2
Zinc (Zn)	ug/wipe	< 3	NONE	3	88	24	< 3	< 3



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DETS Report No: 23-11016

Site Reference: 72 - 80 Leather Lane
Project / Job Ref: RMC/Aug/23/01/P/rc
Order No: None Supplied
Sample Receipt Date: 30/08/2023
Sample Scheduled Date: 30/08/2023
Report Issue Number: 1
Reporting Date: 05/09/2023

Authorised by:

A handwritten signature in black ink, appearing to read 'Kevin Old', is written over a thin horizontal line.

Kevin Old
Operations Director

Dates of laboratory activities for each tested analyte are available upon request.

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Wipe Analysis Certificate						
DETS Report No: 23-11016	Date Sampled	25/08/23				
R M Cameron Environmental Services Ltd	Time Sampled	None Supplied				
Site Reference: 72 - 80 Leather Lane	TP / BH No	Sample Blank 2				
Project / Job Ref: RMC/Aug/23/01/P/rc	Additional Refs	None Supplied				
Order No: None Supplied	Depth (m)	None Supplied				
Reporting Date: 05/09/2023	DETS Sample No	672297				

Determinand	Unit	RL	Accreditation				
Arsenic (As)	ug/wipe	< 2	NONE	< 2			
Barium (Ba)	ug/wipe	< 5	NONE	5			
Beryllium (Be)	ug/wipe	< 0.5	NONE	< 0.5			
Boron (B)	ug/wipe	< 1	NONE	I/S			
Cadmium (Cd)	ug/wipe	< 0.2	NONE	< 0.2			
Chromium (Cr)	ug/wipe	< 2	NONE	< 2			
Copper (Cu)	ug/wipe	< 4	NONE	< 4			
Lead (Pb)	ug/wipe	< 1	NONE	< 1			
Mercury (Hg)	ug/wipe	< 1	NONE	< 1			
Nickel (Ni)	ug/wipe	< 3	NONE	< 3			
Selenium (Se)	ug/wipe	< 3	NONE	< 3			
Vanadium (V)	ug/wipe	< 2	NONE	< 2			
Zinc (Zn)	ug/wipe	< 3	NONE	39			



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Soil Analysis Certificate - Sample Descriptions	
DETS Report No: 23-11016	
R M Cameron Environmental Services Ltd	
Site Reference: 72 - 80 Leather Lane	
Project / Job Ref: RMC/Aug/23/01/P/rc	
Order No: None Supplied	
Reporting Date: 05/09/2023	

DETS Sample No	TP / BH No	Additional Refs	Depth (m)	Moisture Content (%)	Sample Matrix Description
672297	Sample Blank 2	None Supplied	None Supplied		Cotton Ball

Moisture content is part of procedure E003 & is not an accredited test

Insufficient Sample ^{1/S}

Unsuitable Sample ^{4/S}