

PROJECT No. RML 7262

CONTAMINATION INVESTIGATION

AT

52 TOTTENHAM STREET, FITZROVIA

ON BEHALF OF

FLOWER ISLAND (UK) LIMITED

February 2020



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1.0 INTRODUCTION & SCOPE OF WORKS

- 1.1 This report has been prepared by Risk Management Limited (RML) under cover of e-mailed instructions to proceed from the Consulting Engineers, Messrs. TZG Partnership, dated 11th February 2020.
- 1.2 The Client for the work is Flower Island (UK) Limited.
- 1.3 The site under consideration is No. 52 Tottenham Street, Fitzrovia, London W1T 2EH.
- 1.4 It is understood that the existing property is to be demolished and a new, eleven-storey, largely residential development to be constructed with its plan footprint over the whole of the existing site.
- 1.5 Risk Management Limited have previously carried out factual work at this site and this was presented in November 2018.
- 1.6 RML have now been commissioned to provide an interpretative report, based on the previous work.

2.0 FIELDWORK

- 2.1 Fieldwork was generally executed in accordance with the recommendations given in British Standard BS 5930:2015, "Code of Practice for Ground Investigations". Contamination sampling was undertaken in accordance with BS 10175:2011, "Code of Practice for the Investigation of Potentially Contaminated Sites".
- 2.2 Borehole locations are shown on the appended Sketch Fieldwork Location Plan, Drawing No. RML 6835/1.
- 2.3 Fieldwork was undertaken on 24th October 2018 and comprised the following:-

Drive-in-Sampler Boreholes

- 2.4 Owing to access restrictions and the continued usage of the ground level shop, two drive-in-sampler boreholes (DIS1 & DIS2) were drilled to depths of 4.00m and 3.00m below existing ground level, respectively.
- 2.5 The drive-in-sampler comprises a series of 1 and 2 metre long metal tubes, varying in diameter from 80mm down to 35mm, driven into the ground using a mini-hydraulic breaker unit. The tubes are subsequently jacked out of the ground and side windows enable the tubes to be cleaned and small disturbed samples to be taken at regular intervals within each stratum.
- 2.6 Small disturbed samples were taken at regular depth intervals down the boreholes.
- 2.7 Full details of the drive-in-sampler borehole findings are given on the appended borehole record sheets.

3.0 GROUND CONDITIONS

- 3.1 According to information published by the British Geological Survey (Sheet 256, North London) the underlying geology at this site is shown as being Recent Lynch Hill Gravel (River Thames Terrace Deposit) overlying London Clay of the Eocene Period.
- 3.2 River Thames Terrace Deposits generally comprise primarily gravels and sand sourced from varying materials within the river's local catchment area. These Pleistocene deposits are widespread within the London Basin and occur typically as terraces on the valley sides. These terraces represent ancient floodplain deposits that have become isolated as the river has cut downwards to lower levels
- 3.3 London Clay was not encountered during the current investigation.
- 3.4 Full details of the ground conditions encountered are presented on the borehole records appended to this report and can be summarised as follows:-

Depth From (m)	Depth To (m)	Description
0.00	2.80/3.10	MADE GROUND
2.80/3.10	4.00 +	SAND & GRAVEL

- 3.5 Groundwater was not noted during boring.

4.0 LABORATORY TESTING

- 4.1 The following chemical laboratory tests have been carried out on samples recovered from the boreholes at this site.
- 4.2 The chemical testing was carried out in accordance with standard industry methods in a UKAS approved laboratory which is also currently accredited in accordance with MCERTS for the majority of its testing. Further information regarding this accreditation is available on request together with a full list of test methods if required.
- 4.3 *Chemical Analysis*

One sample of MADE GROUND was selected and tested for a range of commonly occurring contaminants and indicators of contamination including those given by the Contaminated Land Exposure Assessment (CLEA).

The contamination suite undertaken at this site includes Metals, speciated PolyAromatic Hydrocarbon (PAH) and speciated Total Petroleum Hydrocarbon (TPH), together with BTEX, Benzene, Toluene, Ethylbenzene and Xylenes. Full details of the results are given on the appended result sheets.

4.4 *Asbestos Identification*

The same sample, as discussed above, was submitted to a UKAS accredited laboratory for asbestos identification. Full details of the results are given on the appended result sheets.

5.0 DISCUSSION

PROPOSED DEVELOPMENT & SCOPE OF WORKS

- 5.1 As discussed in Section 1 above, it is understood that the currently proposed eleven-storey redevelopment of the site, following demolition of the existing building, will provide a mixed use development comprising ground floor affordable workspace (Class B1), four residential units (Class C3) on the upper floors (3 x 1 Bed Units and 1 x 3 Bed Unit), alongside lower ground floor plant, cycle parking and refuse storage.

FOUNDATION DESIGN

- 5.2 It is anticipated that foundations to the new development will be supported on piled foundations. Therefore, a deeper borehole will be scheduled at a future date, to provide pile design parameters, once demolition has been completed.

PRELIMINARY CONTAMINATION ASSESSMENT

- 5.3 Part IIA of the Environmental Protection Act 1990 contains the legislative framework for the regulation of contaminated land and this was implemented in the Contaminated Land (England) Regulations 2000. This legislation allows for the identification and remediation of land where contamination is causing unacceptable risks to human health or the wider environment. The approach adopted by the UK contaminated land policy is “suitable for use” which implies that the land should be suitable for its current use and made suitable for any known future use.
- 5.4 For this **Preliminary Contamination Assessment** the site has been modelled using the Source-Pathway-Receptor approach to produce a Conceptual Site Model.

Source (substances or potential contaminants which may cause harm)

Pathway (a linkage route between the source and receptor)

Receptor (something which may be harmed by the source e.g. humans, plant, groundwater)

5.5 Source

One sample of MADE GROUND was selected and tested for a range of commonly occurring contaminants and indicators of contamination including those given by the Contaminated Land Exposure Assessment (CLEA).

5.6 Pathways

The pathways needing to be considered, as discussed above, depend on the land usage, and for this site will include soil ingestion, inhalation of vapour and dust, run-off, leaching and direct contact.

5.7 Receptors

From the results of the current investigation and the current proposed development for the construction of an eleven-storey residential development, the following potential receptors have been identified.

- Workers on the site likely to come into contact with the soils
- Future users of property
- Any proposed additional vegetation
- Neighbours
- Controlled waters
- Infrastructure
- Structures

5.8 It should be noted that the CLEA software has limited functionality and contains algorithms, which the EA has publicly expressed its intention to update. As a consequence of this, some of the screening values generated by the CLEA software may not adequately reflect specific site conditions and, in some instances, are unduly conservative. In addition, it should also be noted that the figures given in the appended table are based on a 6% soil organic matter content.

- 5.9 The DEFRA/EA model has been developed on the basis of many critical assumptions about possible exposure to soil contamination and the development of conceptual exposure models to describe different land uses as follows:
- *Residential with consumption of home-grown fruit and vegetables*
 - *Residential without consumption of home-grown fruit and vegetables*
 - *Allotments*
 - *Commercial*
- 5.10 The Contaminated Land Exposure Assessment (CLEA) model was originally published in March 2002 as joint DEFRA/EA publications; Contaminated Land Research (CLR) Report CLR 10, with Reports CLR7, 8 and 9 as supporting documents, providing toxicity data and human tolerable daily intake (TDI) data to be used with this model. This model enabled the derivation of more site-specific values for contaminants present on a site, rather than the use of 'generic' values, which were previously used.
- 5.11 DEFRA/EA previously published a number of Soil Guideline Values (SGVs) for certain determinands, (common toxic metals), which were generic guideline criteria for assessing the risks to human health from chronic exposure to soil contamination for standard land-use functions. However, these were withdrawn in late 2008 and DEFRA/EA have now issued a new set of guidance documents. With regard to the Risk Management Limited standard suite of tests, currently SGV figures have only been issued for Arsenic, Cadmium, Mercury, Nickel, Phenols and Selenium.
- 5.12 In the absence of currently published SGV values for the remaining contaminants, Messrs. W. S. Atkins have derived ATRISK^{soil} Soil Screening Values (SSVs) which have been updated using CLEA v1.071 to incorporate changes to exposure assessment parameters, methodology, and land uses as set out in the Department for Environment, Food and Rural Affairs (Defra) Category 4 Screening Level (C4SL) Project Methodology Report.
- 5.13 Full details of how the SSVs have been derived and general notes as to their use are given on the ATRISK website and are available from Risk Management Limited upon request. A few of the PAH levels have not been updated and have been left as per the previous CLEA v1.04 derivation.
- 5.14 The SGV and SSV levels represent "intervention" levels above which the levels of contamination may pose an unacceptable risk to the health of site-users such that further investigation and/or remediation is required.

- 5.15 Total Petroleum Hydrocarbons are considered in accordance with the fractions proposed by The Environment Agency, drawing on the TPHCWG methodology. These are contained in Table 4.2 – Petroleum hydrocarbon fractions for use in UK human health risk assessment, based on Equivalent Carbon (EC) number, contained in Science Report P5-080/TR3, *The UK Approach for Evaluating Human Health Risks from Petroleum Hydrocarbons in Soils*.
- 5.16 The new development is understood to completely cover the plan area of the current site with no landscaped areas included. Therefore, contamination results have been compared with the **Commercial** criteria as shown on the table below. Any exceedences are marked in yellow on the appended laboratory test results sheets.

Determinand (below)	Units	ATRISK Contaminated Land Screening Values (SSV) derived using CLEA v1.071 as set out in DEFRA Category 4 Screening Levels (C4SL) Methodology. 6% SOM Sandy Loam.			
		Residential with consumption of home-grown fruit and vegetables.	Residential without consumption of home-grown fruit and vegetables.	Allotments.	Commercial.
Aliphatic Hydrocarbons (mg/kg)	C5-C6	369	371	6110	29400
	C6-C8	1240	1240	18300	98200
	C8-C10	204	205	2390	14800
	C10-C12	1180	1190	8960	69500
	C12-C16	4130	2710	16300	139000
	C16-C35	210100	212000	477000	3620000
Aromatic Hydrocarbons (mg/kg)	C8-C10	232	332	73.9	20800
	C10-C12	468	1550	95.9	53800
	C12-C16	830	2710	176	65400
	C16-C21	1040	1930	321	28400
	C21-C35	1710	1930	1570	28400
TOTAL TPH					
Naphthalene	mg/kg	12.2	13.1	27.4	1050
Acenaphthylene	mg/kg	-	-	-	-
Acenaphthene	mg/kg	2760	6730	680	106000
Fluorene	mg/kg	2610	4860	796	72000
Phenanthrene	mg/kg	-	-	-	-
Anthracene	mg/kg	26200	37700	11300	544000
Fluoranthene	mg/kg	2980	5050	1010	72600
Pyrene	mg/kg	2120	3780	679	54400
Benz(a)anthracene	mg/kg	8.54	9.04	10.3	10.3
Chrysene	mg/kg	2.64	2.64	2.64	2.64
Benzo(b)fluoranthene	mg/kg	7.29	7.29	7.29	7.29
Benzo(k)fluoranthene	mg/kg	4.12	4.12	4.12	4.12
Benzo(a)pyrene	mg/kg	4.95	5.34	5.72	76.3
Indeno(123-cd)pyrene	mg/kg	9.75	10.3	16.6	144
Dibenz(ah)anthracene	mg/kg	1	1.03	2.57	14.4
Benzo(ghi)perylene	mg/kg	103	104	342	1450
TOTAL PAH					
Cyanide (Free)	mg/kg	34	34	34	373
pH	unit	-	-	-	-
Copper (Total)	mg/kg	4790	9060	1450	106000
Lead (Total)	mg/kg	200	313	79.1	2310
Zinc (Total)	mg/kg	20300	47000	5230	1100000
Chromium III	mg/kg	14300	16700	12600	208000
Chromium (Hexavalent)	mg/kg	20.5	20.5	171	49.1
		CLEA Soil Guideline Values (SGV)			
Benzene	mg/kg	0.33	0.998	0.07	95
Toluene	mg/kg	610	2710	120	4400
Ethylbenzene	mg/kg	350	843	90	2800
Xylenes	mg/kg	230	321	160	2600
Arsenic (Total)	mg/kg	32	35	43	640
Cadmium (Total)	mg/kg	10	83.6	1.8	230
Mercury (Total)	mg/kg	170	238	80	3600
Nickel (Total)	mg/kg	130	130	230	1800
Phenols (Total)	mg/kg	420	519	280	3200
Selenium (Total)	mg/kg	350	595	120	13000

ASSESSMENT OF RESULTS

5.17 No determinands exceeded the CLEA Soil Guideline Values (SGV) or ATRISK Contaminated Land Screening Values (SSV) for **Commercial** usage.

5.18 No Asbestos was identified in the sample tested.

5.19 **Discussion on Remedial Measures**

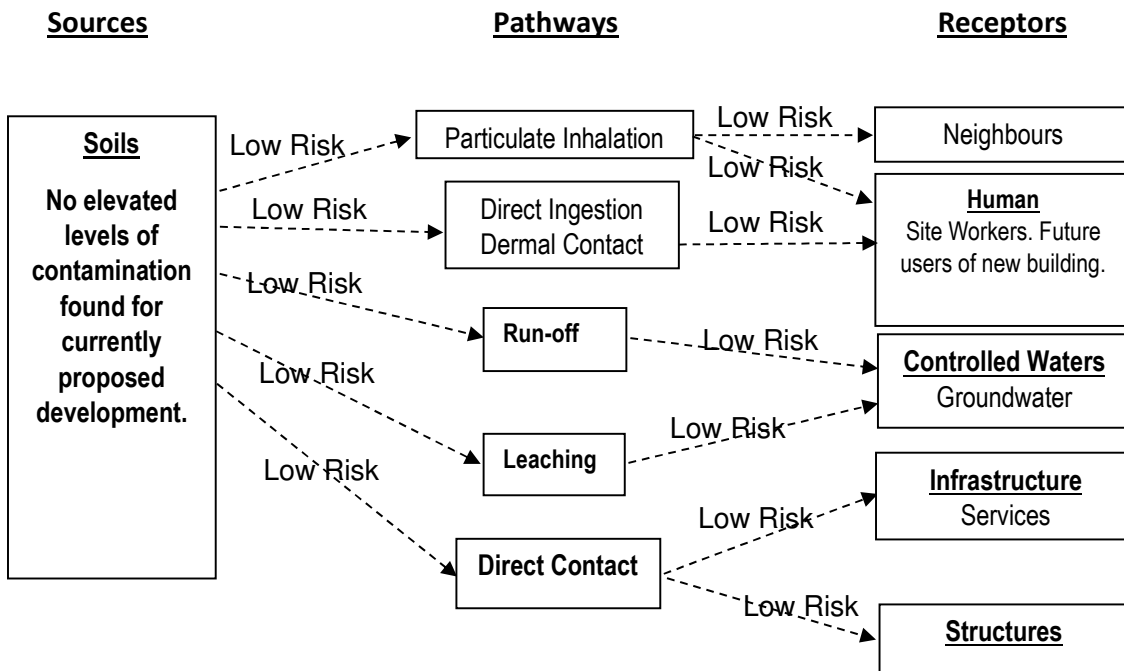
Based on the one sample tested, no remedial measures would be required for the currently proposed development.

Notwithstanding this, we would still recommend that normal Health and Safety requirements are taken with regard to ground workers at this site. Precautions should include, but not be restricted to, the use of PPE equipment such as gloves, overalls and other protective clothing as necessary and access to “hand-wash” facilities should be available during construction of the proposed development.

Any material removed from site should be sent to a suitably licensed landfill and waste tickets should be retained. In addition, any imported “clean” material and/or topsoil should be certified as ‘clean’ and suitable for use. The waste tickets and certification will need to form part of a final Verification Report for the site in due course.

PRELIMINARY CONCEPTUAL SITE MODEL (CSM)

5.20 The following diagram summarises the potential pollution linkages identified for this site in the form of a diagrammatic Preliminary Conceptual Site Model (CSM).



5.21 As always, the above recommendations are based on a selected number of representative samples and further testing may be required if any significant contamination is suspected or encountered during ground works.



Prepared By :

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Director



Checked By :

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Distribution :

Flower Island (UK) Limited

The recommendations made and the opinions expressed in this report are based on the borehole records, examination of samples and the results of site and laboratory tests.

The report is issued on the condition that Risk Management Limited will under no circumstances be liable for any loss arising directly or indirectly from ground conditions between the boreholes or trial pits which have not been shown by the boreholes, trial pits or other tests carried out during the investigation.

In addition, Risk Management Limited will not be liable for any loss whatsoever arising directly or indirectly from any opinion given on the possible configuration of strata both between the borehole and/or trial pit positions and/or below the maximum depth of the investigation. Such opinions, where given, are for guidance only.

Groundwater levels may also vary with time from those reported during our site investigation due to factors such as tidal conditions, heavy pumping from nearby wells or seasonal changes.

No person other than the client to whom this report is addressed, shall rely on it in any respect and no duty of care shall be owed to any such third party.

Copyright of this Report remains with Risk Management Limited and in addition we will not accept any responsibility for the report and recommendations given until our invoice is settled in full.

Borehole Log

Borehole No.

DIS1

Sheet 1 of 1

[illegible]

Remarks:	Groundwater not noted during boring. Borehole terminated at 4.00m depth owing to collapse of sides.
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KEY

D = Disturbed Sample
U = Undisturbed Sample
B = Bulk Sample
W = Water Sample

CPT = Cone Penetration Test
SPT = Standard Penetration Test
V = Vane Test
PP = Pocket Penetrometer
MEXE = Insitu CBR test





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THE ENVIRONMENTAL LABORATORY LTD

Analytical Report Number: 18-20407

Issue: 1

Date of Issue: 08/11/2018

Contact: Malcolm Price

Customer Details: Risk Management Ltd
Unit 8
Paddock Barn Farm
Caterham
Surrey
CR3 6SF

Quotation No: Q14-00012

Order No: RML 6835

Customer Reference: RML 6835

Date Received: 02/11/2018

Date Approved: 08/11/2018

Details: 52 Tottenham Street, London W1T 2EH

Approved by:

Mike Varley, Technical Manager

Any comments, opinions or interpretations expressed herein are outside the scope of UKAS accreditation (Accreditation Number 2683)



Sample Summary

Report No.: 18-20407

Elab No.	Client's Ref.	Date Sampled	Date Scheduled	Description	Deviations
155799	DIS1 D5-D7 2.00 - 3.00	24/10/2018	02/11/2018	Sandy silty loam	

Results Summary

Report No.: 18-20407

ELAB Reference	155799
Customer Reference	D5-D7
Sample ID	
Sample Type	SOIL
Sample Location	DIS1
Sample Depth (m)	2.00 - 3.00
Sampling Date	24/10/2018

Determinand	Codes	Units	LOD	
Metals				
Arsenic	M	mg/kg	1	29.7
Cadmium	M	mg/kg	0.5	0.6
Chromium	M	mg/kg	5	26.9
Copper	M	mg/kg	5	222
Lead	M	mg/kg	5	1320
Mercury	M	mg/kg	0.5	8.6
Nickel	M	mg/kg	5	32.4
Selenium	M	mg/kg	1	< 1.0
Zinc	M	mg/kg	5	209
Inorganics				
Free Cyanide	N	mg/kg	1	< 1.0
Hexavalent Chromium	N	mg/kg	0.8	< 0.8
Total Cyanide	M	mg/kg	1	< 1.0
Miscellaneous				
Moisture Content	N	%	0.1	13.9
pH	M	pH units	0.1	8.0
Stones Content	N	%	0.1	14.6
Phenols				
Phenol	M	mg/kg	1	< 1
M,P-Cresol	N	mg/kg	1	< 1
O-Cresol	N	mg/kg	1	< 1
3,4-Dimethylphenol	N	mg/kg	1	< 1
2,3-Dimethylphenol	M	mg/kg	1	< 1
2,3,5-trimethylphenol	M	mg/kg	1	< 1
Total Monohydric Phenols	N	mg/kg	5	< 5
Polyaromatic hydrocarbons				
Naphthalene	M	mg/kg	0.1	0.2
Acenaphthylene	M	mg/kg	0.1	< 0.1
Acenaphthene	M	mg/kg	0.1	0.1
Fluorene	M	mg/kg	0.1	< 0.1
Phenanthrene	M	mg/kg	0.1	0.3
Anthracene	M	mg/kg	0.1	< 0.1
Fluoranthene	M	mg/kg	0.1	0.2
Pyrene	M	mg/kg	0.1	0.1
Benzo(a)anthracene	M	mg/kg	0.1	0.1
Chrysene	M	mg/kg	0.1	0.2
Benzo (b) fluoranthene	M	mg/kg	0.1	0.1
Benzo(k)fluoranthene	M	mg/kg	0.1	0.1
Benzo (a) pyrene	M	mg/kg	0.1	0.1
Indeno (1,2,3-cd) pyrene	M	mg/kg	0.1	< 0.1
Dibenzo(a,h)anthracene	M	mg/kg	0.1	< 0.1
Benzo[g,h,i]perylene	M	mg/kg	0.1	0.1
Total PAH(16)	M	mg/kg	0.4	1.8

Results Summary

Report No.: 18-20407

ELAB Reference	155799
Customer Reference	D5-D7
Sample ID	
Sample Type	SOIL
Sample Location	DIS1
Sample Depth (m)	2.00 - 3.00
Sampling Date	24/10/2018

Determinand	Codes	Units	LOD	
BTEX				
Benzene	M	ug/kg	10	< 10.0
Toluene	M	ug/kg	10	< 10.0
Ethylbenzene	M	ug/kg	10	< 10.0
Xylenes	M	ug/kg	10	< 10.0
TPH CWG				
>C5-C6 Aliphatic	N	mg/kg	0.01	< 0.01
>C6-C8 Aliphatic	N	mg/kg	0.01	< 0.01
>C8-C10 Aliphatic	N	mg/kg	1	< 1.0
>C10-C12 Aliphatic	N	mg/kg	1	< 1.0
>C12-C16 Aliphatic	N	mg/kg	1	< 1.0
>C16-C21 Aliphatic	N	mg/kg	1	< 1.0
>C21-C35 Aliphatic	N	mg/kg	1	2.1
>C35-C40 Aliphatic	N	mg/kg	1	< 1.0
>C5-C7 Aromatic	N	mg/kg	0.01	< 0.01
>C7-C8 Aromatic	N	mg/kg	0.01	< 0.01
>C8-C10 Aromatic	N	mg/kg	1	< 1.0
>C10-C12 Aromatic	N	mg/kg	1	< 1.0
>C12-C16 Aromatic	N	mg/kg	1	< 1.0
>C16-C21 Aromatic	N	mg/kg	1	< 1.0
>C21-C35 Aromatic	N	mg/kg	1	2.9
>C35-C40 Aromatic	N	mg/kg	1	< 1.0
Total (>C5-C40) Ali/Aro	N	mg/kg	1	5



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Results Summary
Report No.: 18-20407

Asbestos Results

Analytical result only applies to the sample as submitted by the client. Any comments, opinions or interpretations (marked #) in this report are outside UKAS accreditation (Accreditation No2683). They are subjective comments only which must be verified by the client.

Elab No	Depth (m)	Clients Reference	Description of Sample Matrix #	Asbestos Identification	Gravimetric Analysis Total (%)	Gravimetric Analysis by ACM Type (%)	Free Fibre Analysis (%)	Total Asbestos (%)
155799	2.00 - 3.00	DIS1 D5-D7	Brown sandy soil, clinker, brick, stones, shell	No asbestos detected	n/t	n/t	n/t	n/t

Method Summary

Report No.: 18-20407

Parameter	Codes	Analysis Undertaken On	Date Tested	Method Number	Technique
Soil					
Free cyanide	N	As submitted sample	06/11/2018	107	Colorimetry
Hexavalent chromium	N	As submitted sample	06/11/2018	110	Colorimetry
pH	M	Air dried sample	07/11/2018	113	Electromeric
Aqua regia extractable metals	M	Air dried sample	06/11/2018	118	ICPMS
Phenols in solids	M	As submitted sample	06/11/2018	121	HPLC
PAH (GC-FID)	M	As submitted sample	06/11/2018	133	GC-FID
Low range Aliphatic hydrocarbons soil	N	As submitted sample	08/11/2018	181	GC-MS
Low range Aromatic hydrocarbons soil	N	As submitted sample	08/11/2018	181	GC-MS
BTEX in solids	M	As submitted sample	08/11/2018	181A	GC-MS
Total cyanide	M	As submitted sample	06/11/2018	204	Colorimetry
Aliphatic hydrocarbons in soil	N	As submitted sample	06/11/2018	214	GC-FID
Aliphatic/Aromatic hydrocarbons in soil	N	As submitted sample	08/11/2018	214	GC-FID
Aromatic hydrocarbons in soil	N	As submitted sample	06/11/2018	214	GC-FID
Asbestos identification	U	Air dried sample	08/11/2018	PMAN	Microscopy

Tests marked N are not UKAS accredited

Report Information

Report No.: 18-20407

Key

U	hold UKAS accreditation
M	hold MCERTS and UKAS accreditation
N	do not currently hold UKAS accreditation
^	MCERTS accreditation not applicable for sample matrix
*	UKAS accreditation not applicable for sample matrix
S	Subcontracted to approved laboratory UKAS Accredited for the test
SM	Subcontracted to approved laboratory MCERTS/UKAS Accredited for the test
NS	Subcontracted to approved laboratory. UKAS accreditation is not applicable.
I/S	Insufficient Sample
U/S	Unsuitable sample
n/t	Not tested
<	means "less than"
>	means "greater than"

Soil sample results are expressed on an air dried basis (dried at < 30°C)

ELAB are unable to provide an interpretation or opinion on the content of this report.

The results relate only to the items tested

PCB congener results may include any coeluting PCBs

Uncertainty of measurement for the determinands tested are available upon request

Deviation Codes

-
- | | |
|---|--|
| a | No date of sampling supplied |
| b | No time of sampling supplied (Waters Only) |
| c | Sample not received in appropriate containers |
| d | Sample not received in cooled condition |
| e | The container has been incorrectly filled |
| f | Sample age exceeds stability time (sampling to receipt) |
| g | Sample age exceeds stability time (sampling to analysis) |

Where a sample has a deviation code, the applicable test result may be invalid.

Sample Retention and Disposal

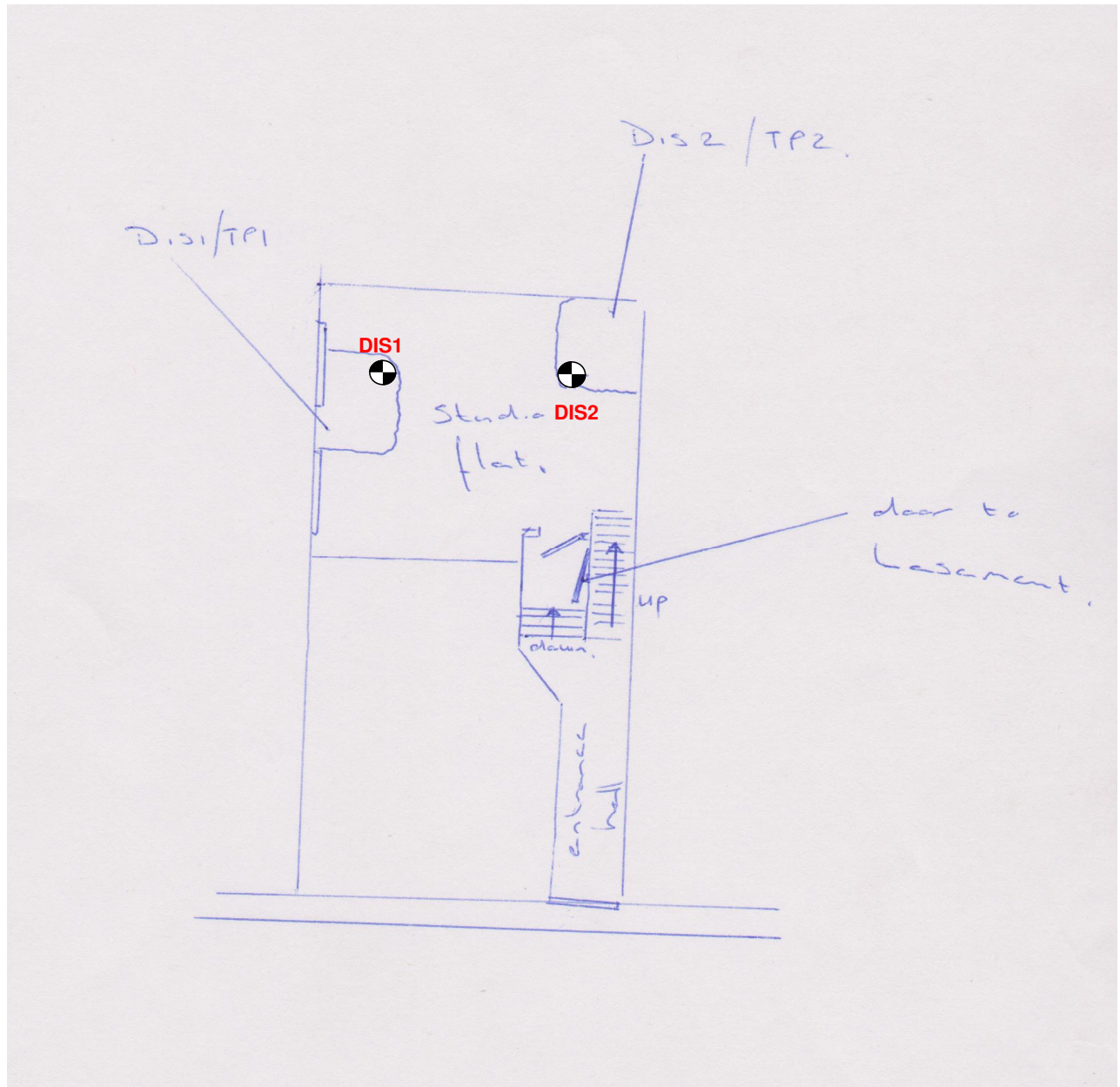
All soil samples will be retained for a period of one month

All water samples will be retained for 7 days following the date of the test report

Charges may apply to extended sample storage

KEY

Drive-in-Sampler Location

**RISK MANAGEMENT LIMITED**Tel : 01883 343572
Fax : 01883 344060

Title :

**SKETCH FIELDWORK
LOCATION PLAN**

Project Location : 52 Tottenham Street, Fitzrovia, London W1T 2EH

Report
Date : November 2018

Scale : NTS

Drawn By : MSP

Drg. No. RML 6835 /1