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Environment
Agency

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Our ref: Part Ila potential site
WGW
Your ref: WGW Part 2a SI- Draft report
Date: 3rd August 2018

ENVIRONMENTAL PROTECTION ACT 1990
PART IIA - CONTAMINATED LAND

Walton Gas Works Draft SI Report comments

Dear Paul

Further to our recent meeting and discussion on the draft Site assessment report for the old Walton gas Works site, I would like to offer the following comments on the draft report. I understand that various issues should be addressed in the second draft but due to time constraints I won't be able to see that before the report is published. Therefore you have asked me to re-iterate the issues I raised at our meeting.

Overall the report addresses the potential Part Ila liabilities in a detailed manner, within the constraints imposed by the site, access arrangements and time. I find the discussion on contamination overly complex in some respects and the contextual discussions particularly difficult to read easily. I understand that this is being addressed in the second draft. With regards to issues related to contamination potential on controlled waters, I find the report has not fully addressed these to the degree I would expect. There needs to be more discussion on previous evidence from other reporting, historic incidents related to gas works related emission into the river and additional monitoring of all existing and new GW monitoring points. This would enable a more rounded discussion on potential groundwater impacts and any additional receptor impacts on the River Thames. The reporting to date indicates variability in reported data taken from a small number of boreholes on a very few occasions. This variability has also been evident in the previously observed impacts in the river from year to year. I would recommend additional monitoring is undertaken before the impacts on controlled waters are closed out in your reporting. This should more clearly establish any source materials beneath the site and adjacent land and recognise the clay strata does not have a clean interface surface with overlying materials and gas works products could be released again with different groundwater conditions. However I recognise that the potential impact on the River Thames per se is likely to be low to moderate now given the reported site findings and period elapsed since significant gas works materials were identified in Boreholes in the Riverside Park. I would however seek the agreed additional monitoring and

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reporting and commentary if the report is to stand up to requirements for assessing risk to controlled waters under the Part IIa regime and the aligned Water framework Directive general requirements.

I understand that second draft will address the following issues and on this proviso I can accept the main reported conclusions and recommendations, although obviously the harm to human health issues are primarily a matter for yourselves.

- The EA/SECOR report investigation design, data and findings will be included in the off-site groundwater discussion chapter.
- Reconsideration the level of uncertainty with regards to this pathway and whether the current risk is moderate/low.
- Simplification of the reported text on contaminant levels and context for any further actions.

I trust you find these comments helpful and I look forward to the final reporting.

Yours faithfully,



Jonathan Atkinson

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