GOLDER

Licence Reference No.	Risk Assessment Methodology Stage and Step	Report Version
N/A	Stage 1 (PSA)	A.2 Final for client

REPORT

Site 47 East Wall Road to Ringsend 38 kV: Preliminary Site Assessment Report for Historic Fluid Filled Cable Loss

ESB Engineering and Major Projects

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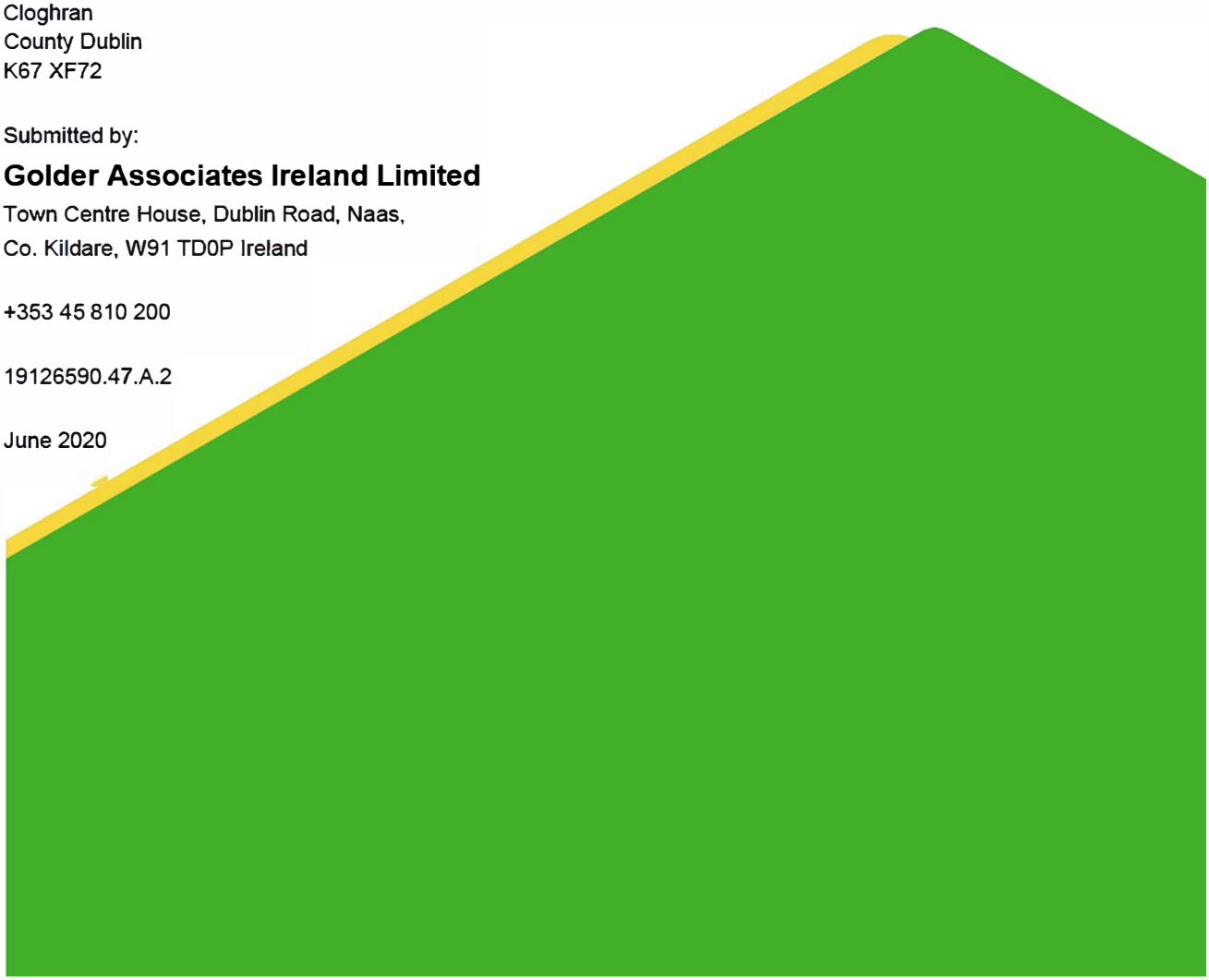

Distribution List

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Executive Summary

ESB operates and maintains a large network of fluid insulated electrical cables across Ireland, with the majority (of fluid filled cables) located in urban settings across Dublin City and Cork City. Due to the location and age of the cables, they are potentially subject to third party interference and damage and/or corrosion and defects, which can potentially cause the cable fluid to leak into adjacent soil, groundwater, and/or surface water. This report focuses on a leak of approximately 390 L of cable fluid (linear alkyl benzene and mineral oil mix) from a 38 kV section of cable between East Wall Road and Ringsend (Site 47). The indicative leak location is in the middle of the road, towards the northern end of Whitebank Road.

The objective of the work was as follows:

- To assess the environmental and human health impact associated with legacy cable fluid loss.

This has been completed in a risk-based staged approach, consistent with the process described in "*Guidance on the Management of Contaminated Land and Groundwater at EPA Licenced Sites*" (EPA, 2013). We note that the section of cable assessed in this report does not form part of an EPA licenced site.

In order to provide ESB with this Preliminary Site Assessment report, Golder has completed the following:

- A Site walkover in the accessible section of the cable (200 m each way along the cable length from the indicative leak location, and laterally as required);
- A desk study of publicly available information; and
- A preliminary Conceptual Site Model (CSM).

The work has been completed in accordance with the scope provided in the proposal P19125590.P1.V0, dated 28 June 2019. No significant variations from this scope were required to complete the work.

The Preliminary Site Assessment approach is considered conservative as it seeks to identify the potential source, and a broad range of initially theoretical pathway and receptor linkages present for each Site. The preliminary CSM identified potential source, pathway, and receptor linkages that may be present at the Site or caused by the leak. A qualitative risk analysis and evaluation was completed on each potential pollutant linkage identified. It is noted that where a potential risk is identified at this stage it does not necessarily mean a risk is present but that further investigation is required to either confirm the presence or absence of the risk. Where a potential linkage has been classified as either low or very low in the risk assessment no further action has been recommended to address this linkage as the actual risks identified in the low and very low risks have been sufficiently assessed in the PSA.

All of the pollutant linkages assessed were classified as either low or very low risk. Golder do not recommend any follow up actions in relation to the 390 L cable fluid loss that occurred in 2007 (and was promptly repaired) at the site.

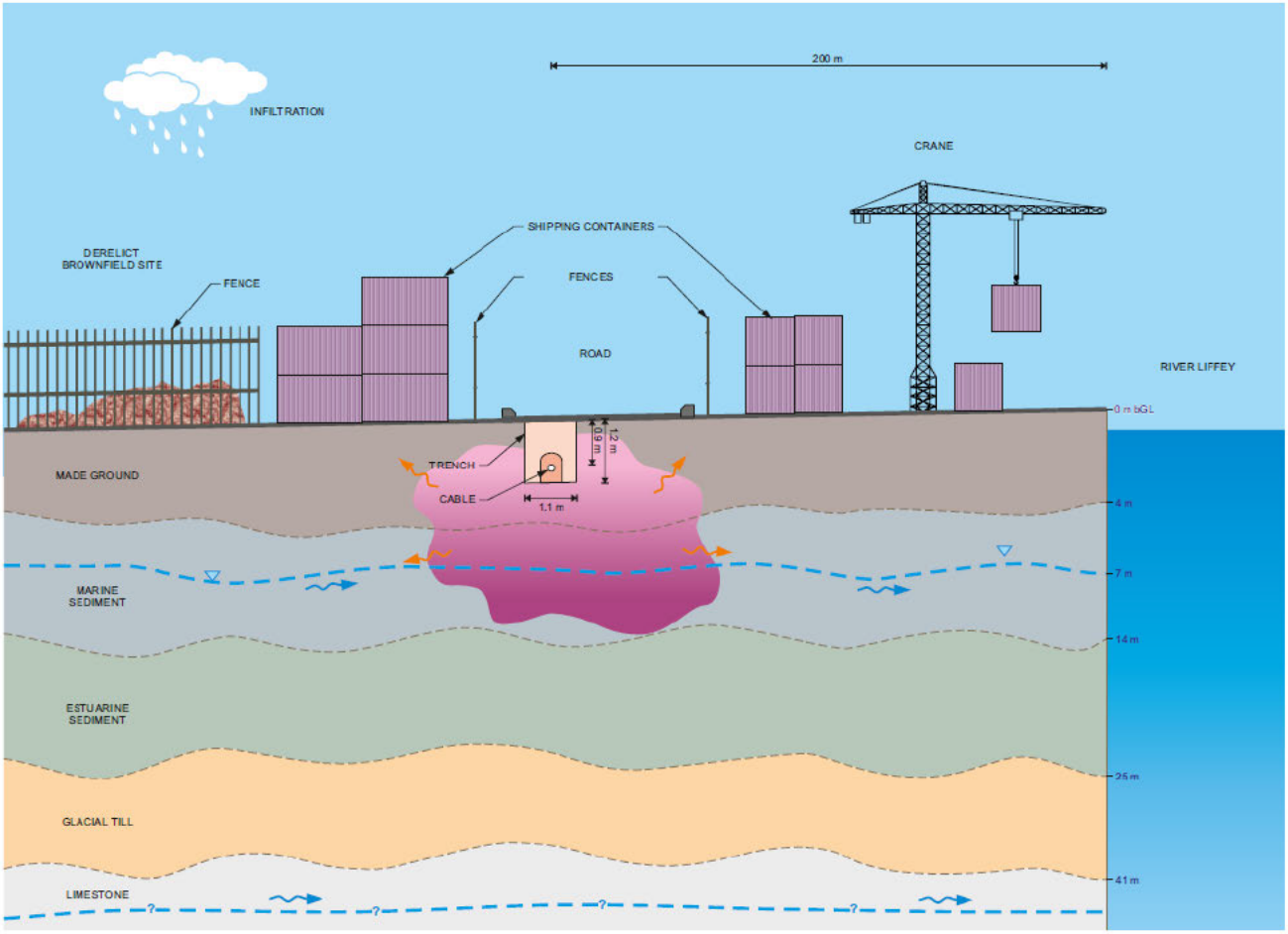

Figure 1: Preliminary CSM for Site 47 (East Wall Road to Ringsend).

Summary of Report Status within the Overall Context of the Contaminated Land and Groundwater Site Assessment

EPA Contaminated Land and Groundwater Risk Assessment Methodology		Report Reference	Report Date	Status
Stage 1: Site Characterisation and Assessment				
1.1	Preliminary Site Assessment	19126590.47.A.2	9 June 2020	A.2 Final for client
1.2	Detailed Site Assessment			
1.3	Quantitative Risk Assessment			
Stage 2: Corrective Action Feasibility and Design				
2.1	Outline Corrective Action Strategy			
2.2	Feasibility Study and Design			
2.3	Detailed Design			

EPA Contaminated Land and Groundwater Risk Assessment Methodology		Report Reference	Report Date	Status
2.4	Final Strategy and Implementation Plan			
Stage 3: Corrective Action and Implementation and Aftercare				
3.1	Enabling Works			
3.2	Corrective Action Implementation and Verification			
3.3	Aftercare			

Study Limitations

IMPORTANT: This section should be read before reliance is placed on any of the opinions, advice, recommendations or conclusions herein set out.

a) This report has been prepared for and at the request of ESB Engineering and Major Projects (the Client) for undertaking activities pursuant to its appointment of Golder Associates Ireland Ltd (Golder) to act as Consultant.

b) Save for the Client, no duty is undertaken, or warranty or representation made to any party in respect of the opinions, advice, recommendations, or conclusions herein set out.

c) Regard should be had to the agreement between Golder and the Client which is taken to be the Golder proposal P19126590.P1.V0 dated 28 June 2019 and the revision P19126590.P1.V1 dated 3 July 2019, when considering this report and reliance to be placed on it.

d) All work carried out in preparing this report has used, and is based upon, Golders' professional knowledge and understanding of the current (November 2019) relevant Irish and European Community legislation, and assumptions set out in this report. Changes in the legislation or assumptions may cause the screening and methodology set out in this report to become inappropriate or incorrect. However, in writing this report, Golder has considered pending changes to environmental legislation and regulations of which it is currently aware. Following delivery of this report, Golder will have no obligation to advise the Client of any such changes, or of their repercussions.

e) Golder acknowledges that it is being retained, in part, because of its knowledge and experience with respect to environmental matters. Golder will consider and analyse all information provided to it in the context of Golders' knowledge and experience and all other relevant information known to Golder. To the extent that the information provided to Golder is not inconsistent or incompatible therewith, Golder shall be entitled to rely upon and assume, without independent verification, the accuracy and completeness of all such information and Golder shall have no obligation to verify the accuracy and completeness of such information. Golder has relied on the Client to provide information on spills, leaks, and other releases of materials to inform potential sources.

f) The content of this report represents the professional opinion of experienced environmental consultants. Golder does not provide specialist legal advice and the advice of lawyers will be required.

g) The scope of work includes interpretation of information from borings and test pits. Attention is drawn to the fact that special risks occur whenever engineering and related disciplines are applied to identify subsurface conditions. Even a comprehensive sampling and testing programme implemented in accordance with a professional Standard of Care may fail to detect certain conditions. The environmental, geologic, geotechnical, geochemical, and hydrogeological conditions that Golder interprets to exist between sampling points may differ from those that actually exist. Passage of time, natural occurrences, and activities near the Site may substantially alter discovered conditions.

h) In the Conclusions section of this report and in the Executive Summary, Golder has set out its key findings and provided a summary and overview of its opinions. However, other parts of this report will often indicate the limitations of the information obtained by Golder and therefore any opinions set out in the Conclusions section and in the Executive Summary ought not to be relied upon until considered in the context of the whole report.

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1.0 INTRODUCTION

ESB Engineering and Major Projects (ESB) has commissioned Golder Associates Ireland Limited (Golder) to complete a Preliminary Site Assessment (PSA) for historical loss of fluid from a high voltage (38 kV) cable run located between East Wall Road and Ringsend ('Site 47') (hereafter referred to as the 'Site').

The work has been completed by suitably qualified and experienced Golder (Ireland and UK) consultants. The curriculum vitae of the Golder consultants who worked on this report are available on request.

The Preliminary Site Assessment approach is considered conservative as it seeks to identify the potential source, and a broad range of initially theoretical pathway and receptor linkages present for each Site. The preliminary CSM identified potential source, pathway, and receptor linkages that may be present at the Site or caused by the leak. A qualitative risk analysis and evaluation was completed on each potential pollutant linkage identified. It is noted that where a potential risk is identified at this stage it does not necessarily mean a risk is present but that further investigation is required to either confirm the presence or absence of the risk. Where a potential linkage has been classified as either low or very low in the risk assessment no further action has been recommended to address this linkage as the actual risks identified in the low and very low risks have been sufficiently assessed in the PSA.

1.1 Background

ESB operates and maintains a large network of fluid insulated electrical cables across Ireland, with the majority (of fluid filled cables) located in urban settings across Dublin City and Cork City. Due to the location and age of the cables, they are potentially subject to third party interference and damage and/or corrosion and defects, which can potentially cause the cable fluid to leak into adjacent soil, groundwater, and/or surface water. ESB has requested that Golder complete a preliminary risk assessment in accordance with the EPA document "*Guidance on the Management of Contaminated Land and Groundwater at EPA Licenced Sites*" (EPA, 2013). We note that the section of cable assessed in this report does not form part of an EPA licenced site.

1.1.1 Site Location

The location of the cable leak, and 200 m Site limits (200 m each way along the cable length from the cable leak) are summarised in Table 1 and shown on Drawing 1.

Table 1: Site Location

	Leak Co-ordinates*	200 m Cable Length Limit*	200 m Cable Length Limit*
Easting	319384	319184	319455
Northing	233803	233861	233666

* These coordinates are approximate and were recorded using Irish Grid Reference Finder.

The Site is located in Ringsend, east of Dublin city centre. The leak occurred in the middle of the road, towards the northern end of Whitebank Road.

1.1.2 Leak Information

The following information regarding the leak has been provided to Golder by ESB.

Table 2: Summary of Leak Information

Site ID	47
Incident Title	47 East Wall Road to Ringsend 38kV – March 2007

Circuit	East Wall – Ringsend 38 kV
Leak Start Date	January 2007
Leak Repair Date	March 2007
Leak Duration (months)	3
Total Leakage (litres)	390
Leakage Rate (litres/month)	130
Volume of Circuit (litres)	6,116
Year Circuit Installed	1951
Voltage (kV)	38
Cable Length (km)	2.1
Leak Size Minus Circuit Volume (litres)	-5,726
Assumed Fluid	Linear alkyl benzene (LAB) / Mineral Oil Mix
Comment	Pre 1970 circuit. Leak size less than circuit volume.
Local Authority	Dublin City Council, South East Area
Leak Location	Towards the northern end of Whitebank Road
Fluid/Oil Type	Cable fluid
Chemical Information	Linear Alkyl Benzene/ Mineral Oil Mix
Brand Name	T 3788
CAS Number	67774-74-7
Chemical Information	Blend of highly refined mineral oils and additives
Brand Name	F&G Masse 106 cable mineral oil
CAS Number	No CAS given on MSDS

No further historical reports or observations made at the time of the leak discovery or repair were available for review as part of this PSA.

1.2 Objectives

The objective of the work is as follows:

- To assess the environmental and human health impact associated with legacy cable fluid loss.

This has been completed in a risk-based staged approach, consistent with the process described in "*Guidance on the Management of Contaminated Land and Groundwater at EPA Licenced Sites*" (EPA, 2013).

1.3 Scope of Works

A summary of the scope of works proposed, which was developed following best practice guidance and relevant Irish legislation, is as follows:

- Desk study – summary of current and historical publicly available information and site-specific data (where available). This included a visit to Trinity College Dublin map library to collect relevant information;
- Site walkover – a walkover of the site was conducted by a suitably qualified Golder engineer, to identify visual or olfactory evidence of potential contamination or areas of concern. The Site walkover extended a minimum of 200 m along the cable length in each direction, and an appropriate lateral distance from the cable leak was determined following the presence of potential human health and/or environmental receptors and/or alternative potential contaminant sources. In this instance private property either side of the indicated leak location prevented a complete walkover (200 m each way along the cable form the leak location) to be undertaken; and
- Preliminary Risk Assessment – this includes the information gathered as part of the desk study and Site walkover, which has been used to determine a preliminary Conceptual Site Model (CSM) identifying the potential source, pathway, and receptor linkages, and next stage recommendations.

More details on the proposed scope of work task summarised are included in proposal (P19126590.P1/V.1).

During the Site walkover the indicative leak location could be accessed. However, the cable 200 m in each direction from the leak location ran directly beneath private property and therefore could not be accessed as part of the Site walkover. To the west the cable runs beneath a shipping container storage yard owned by Peelports Ltd. To the east the cable runs along the boundary between a derelict parcel of land, to the north, and another shipping container yard owned by Rushfleet Ltd, to the south. The cable then runs onto the Ringsend ESB Station.

2.0 SITE DESCRIPTION

The Site walkover was completed on 30 October 2019. The Golder engineer accessed the indicative leak location. However, they could not inspect most of the 200 m in each direction along the cable from the leak location as it was beneath private property (shown on Drawing 1). Peelports Ltd own the land to the west and Rushfleet Ltd the land to the east of the leak. Further east is land owned by ESB, but access was not possible in the timeframe allowed. However, the Golder engineer could observe much of this section of the cable from the perimeter fence and was satisfied than no significant impact was observable from the surface. It is not expected that significant impacts would be observed at ground level along the cable, particularly as most of these areas are covered with hardstanding to accommodate articulated lorries.

Golder understand that there was a separate cable leak (referred to as Site 52) close to the subject leak location, but on a different circuit, prior to this leak. The nearby leak is understood to have been repaired in May 2005. This leak is subject to a separate Preliminary Site Assessment by the ESB.

2.1 Description of Leak Event

ESB has provided Golder with information on the estimated quantities and types of fluid lost as presented in Section 1.1.2 above.

2.2 Current Site Conditions

2.2.1 Leak Location

No evidence of potential contamination from cable fluid/oily substances was observed at the indicative leak location during the Site walkover. Selected photographs of potentially relevant observations made during the Site walkover are provided in APPENDIX A with commentary.

2.2.2 Cable and Area in Proximity to Leak

Where visible from the public road, no evidence of potential contamination from cable fluid/oily substances was observed along the 400 m cable length (200 m each way from the leak location) that we examined during the Site walkover. Selected photographs of potentially relevant observations made during the Site walkover are provided in APPENDIX A with commentary.

3.0 SITE HISTORY

3.1.1 Information Sources

- The Geological Survey of Ireland (GSI) online map viewer – dcenr.maps.arcgis.com, accessed 24 October 2019;
- The Geological Society of Ireland (GSI) Groundwater Bodies Summary for Dublin: http://spatial.dcenr.gov.ie/GSI_DOWNLOAD/Groundwater/Reports/GWB/DublinGWB.pdf, accessed on 24 October 2019;
- Environmental Protection Agency (EPA) online map viewer - https://gis.epa.ie/EPAMaps/, accessed 24 October 2019;
- The National Parks and Wildlife Service (NPWS) map data - https://www.npws.ie/maps-and-data, 24 October 2019;
- The European Pollutant Release and Transfer Registers (E-PRTR) – http://prtr.ec.europa.eu, accessed 24 October 2019;
- The Geohive by Ordnance Survey Ireland – https://geohive/ie/, accessed 24 October 2019;
- The Ireland Grid Reference - http://gridreference.ie/, accessed 24 October 2019; and
- The Irish Grid Reference Finder- https://irish.gridreferencefinder.com/ accessed 25 October 2019.

Trinity Map Library was visited on 23 October 2019 to consult available historical maps relating to the indicative leak location, the 400 m cable length, and areas of interest located laterally from the cable run.

3.1.2 Potential Historical Sources

Historical activities that may have resulted in contamination sources are summarised in Table 3.

Table 3: Historical Activities within 500 m of the Site Boundary

Date	Detail
1908 (1:2500) Dublin (Coolock) Sheet XIX.9	■ The area is significantly less developed to present, and the area to the north of the Site is sea. ■ To the south is undeveloped sand.

Date	Detail
	■ Whitebank Road not present. ■ Land was mostly green space with occasional unlabelled buildings associated with 'Pigeon House Fort' to the south. ■ Much smaller ESB to that of today approximately 1 km east. ■ 'Isolation Hospital' located approximately 230 m east.
1936 (1:2500) Dublin Sheet 19 IX	■ Significantly less developed than present day, with sea immediately north and sand immediately south. ■ Unlabelled building located approximately 50 m east ■ 'Allotments' and 'Ruin' (possibly associated with Pigeon House Fort) located approximately 100 - 200 m west. ■ 'Allotments' approximately 150 m east. ■ Former 'Isolation Hospital' 230 m east now labelled 'Tuberculosis Hospital' along with associated buildings 'Catholic Chapel' and 'Convent' to the east.
1966 (1:2500) Dublin Sheet 19 XIII	■ Land to the south becoming infilled. ■ Former 'Allotments', 'Tuberculosis Hospital', 'Catholic Chapel' and 'Convent' 230 m east now within the footprint of the ESB Station ('Under Construction'), which has the same configuration as present day.
1979 (1:1000) Dublin (Provisional Edn) Map 3264-10 & 3264-15	■ Land to the north has been reclaimed and developed. ■ Land to the south becoming infilled. ■ Unlabelled building approximately 50 m east now redeveloped and labelled 'Convalescent Home'. ■ ESB Station with associated tanks approximately 230 m east complete and in same configuration as present day. ■ Unlabelled land with approximately six. silos and three tanks located approximately 350 m south. ■ 'Warehouse' and other buildings located on the newly infilled land approximately 150 m north. ■ Unlabelled land with multiple tanks located approximately 340 m southwest. ■ 'Coal Yard' located on the newly infilled land approximately 400 m northeast.
1995 (1:1000)	■ Former 'Allotments' 100 m west is now vacant land.

Date	Detail
Dublin Map 3264-10 & 3264-15	■ Former 'Convalescent Home' 50 m east has been redeveloped, now labelled 'Port & Docks Offices'. ■ Tanks and additional buildings associated with the 'Warehouse' 150 m north.

4.0 CHEMICALS OF CONCERN

The information provided by ESB (summarised in Table 2) defines the chemicals present in the cable fluid are Linear Alkyl Benzene (LAB) present in cable fluid T 3788 (CAS 67774-74-7) and a blend of highly refined mineral oils and additives (CAS unknown). LAB and blended mineral oils and additives are the Chemicals of Potential Concern (COPC) discussed further in this PSA.

The European Communities Environmental Objectives (Groundwater) Regulations, 2010 (S.I. 9 of 2010) establish a new strengthened regime for the protection of groundwater in line with the requirements of the Water Framework Directive (2000/60/EC) and the Groundwater Directive (2006/118/EC). Regulations 9(c)–(f) requires the Environmental Protection Agency to identify and publish a list of substances which are to be considered hazardous or non-hazardous and which the Agency considers to present an existing, or potential risk of pollution.

The EPA published such a list of such substances in their guidance document "*Classification of Hazardous and Non-Hazardous Substances in groundwater*" (2010). In this document the EPA has classified four Linear Alkyl Benzene compounds as hazardous (CAS numbers 134211-53-3, 115963-94-5, 115733-08-9 and 96792-49-3) in groundwater. The LAB compound used by the ESB identified with CAS number 6777-74-7 is not classified in this list. It is noted that the EPA document referenced above states that only substances that have been reviewed may be classified as hazardous or non-hazardous. If a substance is yet to be reviewed, then it cannot be classified as non-hazardous. There may be several reasons that a substance has not been reviewed, such as a lack of data on toxicity or bioaccumulation. In this instance Golder consider that the LAB used by ESB is not classified by the EPA with respect to being hazardous or non-hazardous in groundwater.

Mineral oil is listed as a hazardous substance in groundwater in the 2010 EPA guidance document.

The European Chemicals Bureau 1st Priority List (Volume 3) "Union Risk Assessment Report CAS No 67774-74-7" (1999) completed a risk assessment for LAB. The following conclusions about LAB were made in the report:

- In relation to incidental contact of workers with LAB there is no need for additional risk reduction measures beyond normal precautions for this material (such as correct use of PPE);
- It degrades aerobically;
- It is moderately volatile from water with a Henry's Law constant of 95 $Pa.m^3/mol$;
- It is highly adsorptive to soil particles;
- It was not classified as toxic or hazardous under the EU legislation at the time of report issue;
- It was not classified as a skin irritant under EU legislation at the time of report issue;
- It was not classified as an eye irritant under EU legislation at the time of the report issue; and
- It was not classified as a skin sensitiser under EU legislation at the time of the report issue.

4.1 Review of Material Safety Data Sheet

4.1.1 Linear Alkyl Benzene

The Material Safety Data Sheet (MSDS) provided by ESB (H&R ESP, undated) to Golder identified the cable fluid as T 3788 which is a *"low viscosity compound based on a blend of linear alkyl benzenes that have side alkyl chains of 10 – 13 carbon atoms in length."* The MSDS is provided in APPENDIX B. A summary of the chemical properties for LAB as listed in the MSDS are as follows:

- Concentration range is 100%;
- Not classified as a dangerous substance in accordance with The Chemical (Hazard Information and Packaging for Supply) Regulations 2002;
- Clear, colourless liquid;
- Mild petroleum odour;
- pH not determined;
- Boiling point of 280 ˚C;
- Flash point of >135 ˚C;
- Not flammable (but will burn);
- Not explosive;
- Vapour pressure is low at 20 ˚C is <0.02 kPa;
- Density of 0.86 g/cm^{-3} at 20 ˚C;
- Insoluble in water, a solubility value of 0.041 mg/L has been reported in the literature;
- Low volatility;
- Vapour density is >1 (air = 1);
- Evaporation rate is not determined;
- Human effects include skin and eye irritant, nausea and vomiting following ingestion, and irritant of the mucous membranes, cause dizziness, headaches, and nausea if inhaled; and
- No specific environmental hazards under normal use conditions.

LAB is used and manufactured extensively, most commonly in the production of linear alkyl benzene sulphonates (LAS), which are used in household and industrial cleaners and detergents. LAB has minor uses as a solvent and binder in speciality applications namely, cable oil, paint, insulation, electricity, and printing. Up to 1% of LAS is expected to be LAB as the consequence of incomplete conversion during manufacture (Fernandez et al., 2002). Due to the wide use of LAS as a detergent and the discharge of LAS into the domestic sewer, the ultimate receiving environment for LAS and LAB is often the aquatic ecosystem. Concentrations of 0.001 – 2.2 mg/l of LAB has been reported in effluent discharge waters from municipal sewage treatment plants (Europe) (Fernandez et al., 2002).

LAB is produced from petroleum derivatives: benzene and linear paraffins and forms a mixture of long-alkyl chain LAB, with the alkyl group in various ranges (EC, 1997). The LAB used by ESB contains an alkyl chain group restricted to the range of C_{10} – C_{13} carbon atoms, and which are produced under the Chemical Abstract Service (CAS) registration number: 67774-74-7.

The “LAB and Derivatives” REACH Consortia (ReachCentrum, 2012) list LAB as a “*substance of unknown variable composition, complex reaction products or biological materials*”, or ‘UVCB’, for the purpose of chemical classification, labelling, and registration in the information for suggested entry into the International Uniform Chemical Information Database (IUCLID).

LAB is less dense than water, and due to its insolubility, it is likely to act as a Light Non-Aqueous Phase Liquid (LNAPL) when in contact with water (e.g. groundwater or surface water).

4.1.2 Blended Mineral Oil and Additives

The Material Safety Data Sheet (MSDS) provided by ESB (F&G, 1995) to Golder identified the cable fluid as Masse 106 which is a *“blend of highly refined mineral oils and additives.”* The MSDS is provided in APPENDIX B. A summary of the chemical properties for the blended mineral oil as listed in the MSDS are as follows:

- Yellow liquid (under most environmental conditions);
- Pourpoint of < -60˚C;
- Flashpoint of 145˚C;
- Flammability lower limit 0.6 vol %, and higher limit of 6.5 vol%;
- Vapour pressure at 20˚C is <0.01 hPa;
- Density of 888 kg/m^3 (floats on water);
- Negligible solubility;
- N-octane/water partition coefficient is not applicable;
- Stable under normal conditions;
- Readily adsorbed to soil particles (limited mobility);
- May bioaccumulate;
- Expected to be practically non-toxic to aquatic organisms, LC/EC50 >100 mg/l;
- Not readily biodegradable; and
- Human health effects include aspiration to lungs, may cause chemical pneumonitis from inhalation or ingestion, and dermatitis through skin contact.

At present without further information identifying the mineral oil (no CAS number is available for the product) it is not possible to make specific comments about this product. Golder notes that mineral oils are typically aliphatic range hydrocarbons with chain lengths of between 11 and 40 carbon atoms. The additives to these mineral oils are unknown. The vapour pressure indicates that the product is not volatile.

It is noted that the EPA classifies mineral oil as a hazardous substance in groundwater as per the EPA (2010) guidance on this issue.

5.0 ENVIRONMENTAL SETTING

5.1.1 Information Sources

Information regarding geology, hydrology, hydrogeology and environmentally sensitive areas for the Site and surrounding area has been primarily obtained from publicly available sources outlined in Section 3.1.1.

5.1.2 Topography

The Site lies at an elevation of approximately 5 m above Ordnance Datum (m AOD) according to Ireland Grid Reference. The elevation falls towards the west end of the cable run.

5.1.3 Current Surrounding Land Use

A summary of land use surrounding the leak location is provided is Table 4.

Table 4: Summary of Current Surrounding Land Use

Direction from Leak Location	Description of Current Land Use
North	To the north lies a shipping yard beyond which is Dublin Harbour.
East	To the east lies a shipping container yard, Ringsend substation and industrial areas.
South	To the south lies industrial areas. There is a brownfield (previously developed) area to the southwest.
West	To the west lies a shipping container yard, industrial areas and a roundabout. Beyond the roundabout lies a recycling centre and residential areas.

Overall the Site is generally surrounded by industrial areas. The indicative leak location lies under Whitebank Road, which is surrounded by industrial properties.

5.1.4 Current Waste Permits, IPC, and IE Licences in Area of Site

A review of the data available on the EPA online maps show two IPPC licensed facilities which hold Industrial Emissions licenses (IE) within 500 m of the Site. These include licenses held by Synergen Power Limited and The Hammond Lane Metal Company Limited which lie approximately 250 m southeast and 450 m northeast from the Site, respectively.

5.1.5 Sensitive Ecological Receptors

A review of the data available on the National Parks and Wildlife Service (NPWS) map viewer shows the nearest protected sites are the South Dublin Bay Special Area of Conservation (SAC) (000210) and the South Dublin Bay and River Tolka Estuary Special Protection Area (SPA) (004024), which lie approximately 470 m south of the Site. South Dublin Bay is also a proposed Natural Heritage Site. In addition, the Liffey Estuary Lower, approximately 220 m north of the Site, is listed as a surface water in SPA and SAC sites. We note that this report does not represent an ecological assessment and that if such assessments are required will be completed separately by a suitably qualified ecologist as appropriate.

5.1.6 Hydrology

5.1.6.1 Surface Water Features

The Site lies within the "Liffey and Dublin Bay" Water Framework Directive catchment. The nearest surface water feature is the River Liffey, located approximately 220 m north of the Site. The South Dublin Bay is located approximately 470 m south of the Site.

5.1.6.2 Surface Water Quality

The WFD catchment area is known as the "Liffey and Dublin Bay" catchment. According to the EPA Transitional Waterbodies Risk map, the River Liffey is "at risk" and it's 2010 – 2015 WFD status is moderate. According to the WFD Coastal Waterbodies Risk Map the Dublin Bay is "not at risk" and it's 2010 – 2015 WFD status is good.

5.1.6.3 Surface Water Abstraction

The GSI online map viewer did not show any Group Water Scheme Abstraction points within a 500 m radius of the Site.

5.1.6.4 Discharges to Surface Water

A review of the data available on the EPA map register shows there are no Section 4 Discharges within a 500 m radius of the Site.

5.1.6.5 Surface Water Flooding

According to the Office of Public Works (OPW) flood maps some sections of Pigeon road have a high probability of flooding by rainfall (1 in 10 chance of occurring or being exceeded in any given year). It is unclear if the Site is affected by these sections. There are no recorded flood events within 500 m of the Site.

5.1.6.6 Pollution Releases to Land, Air and Water

The European Pollutant Release and Transfer Register (E-PRTR), compiles data on releases of pollutants and transfer of wastes for specified industries across the EU for 91 pollutants. LAB and mineral oil are not listed as specified pollutants in this register.

5.1.7 Geology

5.1.7.1 Artificial Ground

The EPA National subsoils map shows that Made Ground deposits are present beneath the Site. The depths of these deposits will vary; however, a borehole located adjacent to the Site (GSI reference R2838/B92439) indicates Made Ground to 3.96 m below Ground Level (b GL).

5.1.7.2 Superficial and Bedrock Geology

The GSI Subsoils (Quaternary Sediments) map shows the subsoil beneath the Site as ‘Urban’. A review of the Bedrock Geology 1:100,000 map (GSI) shows that the underlying bedrock geology is the Lucan Formation. This is described as dark limestone and shale (calp).

5.1.7.3 Faulting

The Bedrock Geology 1:500,000 map (GSI) Faults map indicates that there are no faults within a 1 km radius of the Site.

5.1.8 GSI Borehole Logs

There are no registered wells or springs within 500 m of the Site. The GSI geotechnical viewer showed a borehole located adjacent to the Site which was drilled to a depth of 47.85 m bGL (GSI reference R2838/B92439). The geology encountered was recorded as Made Ground to 3.96 m bGL, underlain by marine sediment to 14.78 m bGL, estuarine sediment to 19.66 m bGL, glaciofluvial sands and gravels to 20.27 m bGL, glacial till to 41.30 m bGL, and limestone bedrock to the end of hole at 47.85 m bGL (extent not proven). A depth to groundwater was recorded at 7.0 m bGL.

The GSI geotechnical viewer showed another borehole located adjacent to the Site which was drilled to a depth of 47.85 m below Ground Level (bGL) (GSI reference R1103/B64210). The geology encountered was recorded as Made Ground to 3.96 m bGL, underlain by marine sediment to 14.33 m bGL, estuarine sediment to 30.00 m bGL, glacial till to 42.49 m bGL, and limestone bedrock to the end of hole at 47.85 m bGL (extent not proven). No groundwater was encountered in this borehole.

5.1.9 Hydrogeology

5.1.9.1 Groundwater Vulnerability

The GSI groundwater vulnerability map indicates the Site has a low vulnerability to groundwater contamination. The GSI Bedrock Aquifer map information does not appear to cover the site. The nearest available coverage is in Ringsend Park approximately 700 m west of the Site, which indicates the bedrock aquifer to be locally important. According to GSI, this is bedrock that is moderately productive only in local zones and is capable of supplying locally important abstractions (smaller public water supplies, and group schemes).

5.1.9.2 Discharges to Groundwater

A review of the data available on the EPA map register shows there are no known Section 4 discharges to within 500 m.

5.1.9.3 Groundwater Group Water Scheme Abstraction Points

The GSI online map viewer did not show any Group Water Scheme Abstraction points within a 500 m radius of the Site. The Site does not lie within a groundwater source protection zone.

5.1.9.4 Groundwater Flow Directions

There is no published information on groundwater levels or flow direction for the area of the Site. It is anticipated that groundwater beneath the Site could flow north towards the River Liffey. Groundwater could also flow west or south towards Dublin Bay. Groundwater flow may be influenced by anthropogenic features. However, there is no Site-specific data available at this time to confirm this assumption.

5.1.9.5 Groundwater Quality

The Groundwater Body (GWB) underlying the Site is known as the Dublin GWB. The Dublin GWB is approximately 837 km^2 in areal extent. The GSI classifies this GWB as poorly productive bedrock. According to the EPA Ground Waterbody Water Framework Directive (WFD) map, the groundwater waterbody status is classified as good. The groundwater is also listed as flowing through SAC species areas and habitats, and SPA habitats. This statement applies to the entire GWB and is not specific to the leak location. In Dublin City centre where this Site is located the utilisation of the GWB as a potable resource is considered to be low due to the availability of potable mains supply and the relatively poor yielding potential of the aquifer.

6.0 PREVIOUS SITE SAMPLING AND MONITORING DATA

ESB has confirmed that there is no Site sampling and monitoring data, or observation reports available for the Site.

7.0 PRELIMINARY CONCEPTUAL SITE MODEL

The PSA is the first tier of a risk assessment; the purpose of the PSA is to develop a preliminary Conceptual Site Model (CSM) for the Site and establish whether or not there are potentially unacceptable risks. The outcome of the PSA is a decision as to whether or not further action is needed.

7.1 Context of the PSA

This PSA is being conducted to assist ESB with managing its potential liabilities associated with the Site.

7.2 Development of the Preliminary CSM

A preliminary CSM has been established from the data obtained from the following sources:

- Publicly available data;

- Trinity College Dublin Map library;
- ESB provided data; and
- Site walkover observations.

In the definition that has become accepted by the environmental industries and regulators (and discussed in the EPA (2013) *Guidance on the management of contaminated land*), there are three components to consider when developing a CSM:

- The *source* is the COPC identified, specifically it is the leak of the known cable fluid;
- The *pathways* are any routes linking the source with the receptors (in which degradation processes may also occur); and
- The *receptors* are humans and controlled waters that are connected to the source by the pathways, such as soils, vapours, aquifers, surface watercourses, local supply boreholes, or springs. Whilst ecological receptors are not normally considered in preliminary risk assessment protected species/sites are considered here to flag any potential issues that may require further detailed assessment.

These three components are linked within a conceptual model for a site. Should either one of the source, pathway, or receptor be absent from the site setting, the pollutant linkage is deemed not to be present therefore negligible risk will be posed to human health and/or controlled water environments.

7.3 Description of the Source

The source is the indicative leak location of the fluid filled cable (Eastings: 319384, Northing: 233803) (locations approximated from ESB provided drawing, Figure 47. An adapted version is provided in Drawing 1). ESB estimate the total loss of cable fluid over the leak period as approximately 390 L. The ESB has stated that the leak was repaired in March 2007.

A summary of the source (LAB and mixed mineral oil) is provided in Section 4.0.

7.4 Description of the Pathways

A description and summary of the potential pathways identified is provided in Table 6.

The trenches for the cable runs are likely to be the primary potential pathway for the cable fluid to migrate away from the indicative leak location. Details of a typical cable trench construction (provided by ESB) are as follows:

- Depth to the base of trench 1,200 mm;
- Depth to top of cable 900 mm – 1,000 mm;
- Thickness of sand surrounding cables 350 mm;
- Width of trench 1,100 mm; and
- Backfill is either arisings or Clause 804 (gravel up to 75 mm diameter).

7.5 Description of the Receptors

A description and summary of the potential receptors identified is provided in Table 6.

Drawing 2 provides an overview of the source and potential sensitive receptors located within 1 km of the Site. Sensitive receptors comprise of human health risks (e.g. schools or hospitals), or risks to controlled waters (e.g. rivers or lakes or groundwater).

7.6 Preliminary Conceptual Site Model Risk Analysis

The potentially significant source-pathway-receptor linkages present at the Site and surrounding area (200 m along the cable length from the indicative leak location each way, and up to 500 m laterally from the cable run) are summarised in Table 6.

The level of potential risk of the identified pollutant linkage to human health and/or controlled waters and protected species and natural habitats has been completed with reference to CIRIA guidance document C522 "*Contaminated Land Risk Assessment a Guide to Good Practice*" (2002). This document presents a qualitative framework for evaluating risk which is useful at the PSA stage, prior to intrusive investigations being completed. C522 presents a risk matrix that allows a qualitative expression of:

- Magnitude of a potential consequence (severity) of a risk occurring; and
- Magnitude of the probability (likelihood) of the risk occurring.

Table 5: Risk Matrix – Consequence versus Probability.

		Consequence (of risk being realised)			
		Severe	**Medium**	**Mild**	**Minor**
Probability (of risk being realised)	**High Likelihood**	**Very High Risk**	**High Risk**	**Moderate Risk**	**Moderate/Low Risk**
	Likely	**High Risk**	**Moderate Risk**	**Moderate/Low Risk**	**Low Risk**
	Low Likelihood	**Moderate Risk**	**Moderate/Low Risk**	**Low Risk**	**Very Low Risk**
	Unlikely	**Moderate/Low Risk**	**Low Risk**	**Very Low Risk**	**Very Low Risk**

A detailed description of the probability and consequence definitions is provided in CIRIA guidance document C522. These definitions are also provided in APPENDIX C. Golder has applied this methodology to the identified pollutant linkages for this Site and presented the findings in Table 6. Each identified pollutant linkage has been numbered and a qualitative risk rating applied to the linkage. Comments are provided for consideration of the risk evaluation for each linkage.

Table 6: Summary of the Preliminary Source, Pathway, Receptor Linkages (CSM)

Linkage Number	Source	Pathway	Receptor	Consequence of Risk Being Realised	Probability of Risk Being Realised	Risk Classification	Comments
1	Free-phase LAB and blended mineral oil from the cable leak	Migration along the cable trench through the permeable infill materials	1a) Groundwater and/or 1b) surface water: direct contact or adjacent to the trench, likely to act as a LNAPL	1a) Minor 1b) Minor	1a) Unlikely 1b) Unlikely	1a) Groundwater – Very Low Risk 1b) Surface water – Very Low Risk	1a) Groundwater vulnerability is classified as 'Low' in the vicinity of the Site and, according to nearby borehole logs, the Till thickness is approximately 16 m. This is a significant thickness of relatively impermeable material (i.e. Till) above the bedrock. Given the above and the relatively low volume of leaked fluid (390 L) and time elapsed since the loss any potential groundwater in the bedrock is considered a Very Low Risk. Shallow groundwater, likely perched or associated with Dublin Harbour, was noted in the Marine Sediment at approximately 7 m bGL i.e. still a significant depth. Mineral oil is classified as hazardous in groundwater; however, given the relatively low volume of leaked fluid, the time elapsed since the leak occurred this is considered a Very Low Risk. 1b) The nearest surface water receptor is the River Liffey/Dublin Harbour, approximately 200 m north of the Site. We note the cable runs east to west at a consistent distance from the river. For the fluid to contact the river, it would need to migrate laterally out of the cable trench and

Linkage Number	Source	Pathway	Receptor	Consequence of Risk Being Realised	Probability of Risk Being Realised	Risk Classification	Comments
							through approx. 200 m of Made Ground. Given the relatively low volume of leaked fluid and the time elapsed since the leak occurred this is considered unlikely and a Very Low Risk.
2		Migration along other service trenches/pipes	2a) Groundwater and/or 2b) Surface water: direct contact or adjacent to the trench, likely to act as a LNAPL	2a) Minor 2b) Minor	2a) Low Likelihood 2b) Low likelihood	2a) Groundwater – Very Low Risk 2b) Surface water – Very Low Risk	2a) Groundwater vulnerability is classified as 'Low' in the vicinity of the Site and, according to nearby borehole logs, the Till thickness is approximately 16 m. This is a significant thickness of relatively impermeable material (i.e. Till) above the bedrock. Given the above and the relatively low volume of leaked fluid (390 L) and time elapsed since the loss any potential groundwater in the bedrock is considered a Very Low Risk. Shallow groundwater, likely perched or associated with Dublin Harbour, was noted in the Marine Sediment at approximately 7 m bGL i.e. still a significant depth. Mineral oil is classified as hazardous in groundwater; however, given the relatively low volume of leaked fluid, the time elapsed since the leak occurred this is considered a very Low Risk. 2b) The nearest surface water receptor is the River Liffey/Dublin Harbour, approximately 200

Linkage Number	Source	Pathway	Receptor	Consequence of Risk Being Realised	Probability of Risk Being Realised	Risk Classification	Comments
							m north of the Site. We note the cable runs east to west at a consistent distance from the river. For the fluid to contact the river, it would need to migrate laterally out of the cable trench and through approx. 200 m of Made Ground. Given the relatively low volume of leaked fluid and the time elapsed since the leak occurred this is considered unlikely and a very low risk.
3			Mains water pipes	Mild (due to presence of mineral oil)	Unlikely	Very Low Risk	Mains water pipes remain in positive pressure, ensuring that any water in areas of damaged pipework/leaks is forced out from the pipe, rather than allowing ingress into the water pipes. At this time, LAB and mineral oil is not known to be aggressive to plastic or metal pipework, or cause leaching from plastic pipework.
4	LAB and blended mineral oil in groundwater from the cable leak (low solubility)	Dissolution of contaminants, vertical and lateral migration of dissolved contaminants in groundwater	Groundwater and/or surface water: direct contact or adjacent to the trench. Impacts to the groundwater body beneath the Site which	Mild	4a) Groundwater - Unlikely 4b) Surface Water - Unlikely	4a) Groundwater – Very Low Risk 4b) Surface water – Very Low Risk	4a) Groundwater vulnerability is classified as 'Low' in the vicinity of the Site and, according to nearby borehole logs, the Till thickness is approximately 16 m. This is a significant thickness of relatively impermeable material (i.e. Till) above the bedrock. Given the above and the relatively low volume of leaked fluid (390 L) and time elapsed since the loss any potential groundwater in the bedrock is considered a Very Low Risk.

Linkage Number	Source	Pathway	Receptor	Consequence of Risk Being Realised	Probability of Risk Being Realised	Risk Classification	Comments
			has currently "Good" status				Shallow groundwater, likely perched or associated with Dublin Harbour, was noted in the Marine Sediment at approximately 7 m bGL i.e. still a significant depth. Mineral oil is classified as hazardous in groundwater; however, given the relatively low volume of leaked fluid and the time elapsed since the leak occurred this is considered a very Low Risk. 4b) The nearest surface water receptor is the River Liffey/Dublin Harbour, approximately 200 m north of the Site. We note the cable runs east to west at a consistent distance from the river. For the fluid to contact the river, it would need to migrate laterally out of the cable trench and through approx. 200 m of Made Ground. Given the relatively low volume of leaked fluid this is considered unlikely and a very low risk.

Notes: PPE = Personal Protective Equipment.

Drawing 2 provides a visual representation of Table 6, and highlights the potential pollutant linkages identified in the preliminary CSM assessment.

As defined in the guidance, risk is only realised when a linkage is proven between the source, pathway, and receptor. The linkage must be present between all three elements for a risk to be realised. Risk due to short term exposure, for example ground workers, are not considered here as they should be managed by appropriate use of PPE or other measures identified in a contractors Risk Assessment and Method Statement (RAMS) documents. During the risk analysis, Golder reviewed several relevant source, pathways, and receptors, and subsequently discounted the risks show in Table 7, as there are incomplete linkages i.e. a potential risk not possible for a given scenario.

Table 7: Summary of Incomplete Source, Pathway, Receptor Linkages Considered

Source	Pathway	Receptor	Pollutant Linkage Identified?
390 L LAB and blended mineral oil in unsaturated soils from the cable leak	Vertical and lateral migration of LAB and blended mineral oil through the unsaturated zone	Local residents with gardens: direct ingestion and dermal contact with soils; Plant uptake and inhalation of vapours – No residential properties in the vicinity.	Receptor linkage not viable
390 L LAB and blended mineral oil in unsaturated soils from the cable leak	Infiltration of rain, leaching of contaminants, and vertical/horizontal migration of dissolved contaminants – area covered by hardstanding.	Groundwater	Pathway linkage not viable
390 L LAB and blended mineral oil in unsaturated soils from the cable leak	Dust and soil (from near surface soils) ingestion – area covered by hardstanding and leak occurring approximately 0.9 m from surface.	Short-term Public (i.e. passers-by, not workers)	Pathway linkage not viable
390 L LAB and blended mineral oil in unsaturated soils from the cable leak	Migration in groundwater - the closest protected sites are the South Dublin Bay SAC and South Dublin Bay and River Tolka Estuary SPA. The groundwater flow direction is not defined for the Site; however, the distance from the source to these areas is 470 m.	Protected Sites	Pathway linkage not viable
390 L LAB and blended mineral oil in unsaturated soils from the cable leak	Volatisation and migration of vapours, accumulation in underground ducts, services, cellars and basements	Ground workers – Short term exposure risk is not assessed in the PSA as it is outside the scope of this report. Short term exposure risks to	Short term exposure risks not examined in the PSA which deals with long term (chronic) risks to receptors

Source	Pathway	Receptor	Pollutant Linkage Identified?
		workers are assessed as part of the Health and Safety Risk assessment (RAMS). Standard PPE measures apply for workers engaged in groundworks in Made Ground to minimise contact with potential contaminants and additional measures are not considered necessary.	

8.0 RISK EVALUATION

Potential pollutant linkages that could impact the identified receptors have been identified in the preliminary risk assessment. These linkages have been identified where the source, pathway, and receptor are all present and potentially viable, and the source is therefore considered to pose a theoretical risk to the identified receptors. However, we note that all the risks are classified as low or very low risk. This is primarily related to the relatively small volume of cable fluid lost (390 L) and the time elapsed since the loss (12 years) giving potential for LAB and mineral oil to degrade in the subsurface. Golder consider that only residual pockets of LAB/mineral oil, if any, will remain at this time from this loss.

The nearest protected sites are South Dublin Bay SAC and South Dublin Bay and River Tolka Estuary SPA, both located approximately 470 m southeast of the site. At this distance from Site and considering the leak volume, these areas are not considered a potential receptor, as there is no viable pathway present.

Golder recognises that at present the ability of LAB and mineral oil to penetrate water pipes is not a fully understood risk, albeit likely to be a low risk. In the event that LAB was able to penetrate water pipes, then it is possible to examine the potential for LAB to dissolve in the water in the pipes and compare this to potential toxicity and drinking water limits (e.g. WHO drinking water guideline values).

The WHO drinking water guideline value for EC_{10}–EC_{12}, EC_{12}–EC_{16} aromatic fractions (*Petroleum Products in Drinking-water, Background document for development of WHO Guidelines for Drinking-water Quality, 2008*) is 0.09 mg/l. The solubility limit of LAB is 0.041 mg/L (OECD). Therefore, it is not possible for LAB to dissolve into water in supply pipes above the drinking water limit i.e. the drinking water guidance cannot be exceeded. Furthermore, presuming permeation of LAB through the pipe is occurring, the maximum solubility limit (0.041 mg/l) could potentially be reached if water within the pipe was stagnant and allowed to fully dissolve or equilibrate over time; however, Golder understands that water will be moving in the pipe making it difficult for LAB to reach its solubility limit.

Accordingly, the probability of the risk would be considered unlikely i.e. pollutant linkage may be present in such a scenario, but the circumstances under which harm would occur are improbable. Therefore, along with a medium potential hazard, this would result in an overall rating of ‘Low Risk’.

At present Golder consider that the potential for vertical migration of LAB and blended mineral oil through the Till to be low. Two boreholes in close proximity to the Site suggest the Till thickness is between 12 m and 20 m at this location. Given this thickness of relatively impermeable material and the relatively low volume of the leak (390 L), the bedrock groundwater is considered to be at a low risk. Shallow groundwater, likely perched or associated with the nearby River Liffey/Dublin Harbour, was noted in the marine sediment, which is not protected from migration of LNAPL/dissolved phase LAB and mineral oil by the Till. However, given the relatively low volume of the leak and the nature of the shallow groundwater (perched and/or associated with the River Liffey) this is considered a low risk. The nearest surface water body, the River Liffey/Dublin Harbour, located 200 m north of Site is also considered to be at low risk, considering the low volume of the leak. If any cable fluid migrated to the quay wall and entered the River Liffey, the huge dilution capacity of this tidal section of the Liffey Estuary would likely make detection impossible.

Given the industrial nature of the Site and surrounds, there are no residential receptors that could be potentially exposed to the cable fluid loss.

The availability of lateral preferential pathways along ducting routes is most likely to be the primary migration pathway for this Site due to the presence of industrial properties within close proximity of the indicative leak location. However, the low volume of the leak means that it is unlikely to have migrated a significant distance from the indicated leak location and given the time since the loss occurred has had significant time to degrade in the subsurface.

8.1 Conclusions

Due to the known leak of a relatively small volume of cable fluid into the permeable cable trench material, the timely repair of the leak, and the unknown characteristics (e.g. permeability) of the Made Ground likely to be surrounding the trench, the potential risks identified to receptors are all classified as Very Low Risk. Golder does not recommend any follow up actions in relation to the loss of 390 L of cable fluid in 2007 at this site.

9.0 REFERENCES

CIRIA (2002) “Contaminated Land Risk Assessment a Guide to Good practice” (C522).

Environmental Protection Agency (EPA) (2013) “Guidance on the Management of Contaminated Land and Groundwater at EPA Licenced Sites”.

The European Chemicals Bureau 1st Priority List (Volume 3) “Union Risk Assessment Report CAS No 67774-74-7” (1999).

European Commission Joint Research Centre (EC) (1997) *European Union Risk Assessment Report Volume 3: benzene, C_{10-13} alkyl derivatives risk assessment.* EUR 19011 EN. Final report, dated 30 June 1997.

F&G (1995) *Safety Data Sheet (93/112/EC)*. Dated October 1995.

Fernandez, C., Alonso, C., Garcia, P, Tarazona, J.V., Carbonell, G. (2002) *Toxicity of Linear Alkyl Benzenes (LABs) to the Aquatic Crustacean Daphnia magna through Waterborne and Food Chain Exposures.* Bulletin for Environmental Contamination and Toxicology, vol 68, issue 5, pp 637-643.

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WHO (2008) Petroleum Products in Drinking-water, Background document for development of WHO Guidelines for Drinking-water Quality.

Signature Page

Golder Associates Ireland Limited

[redacted]
Geo Environmental Engineer

[redacted]
Geo Environmental Director

GF/TM/es

Date: 9 June 2020

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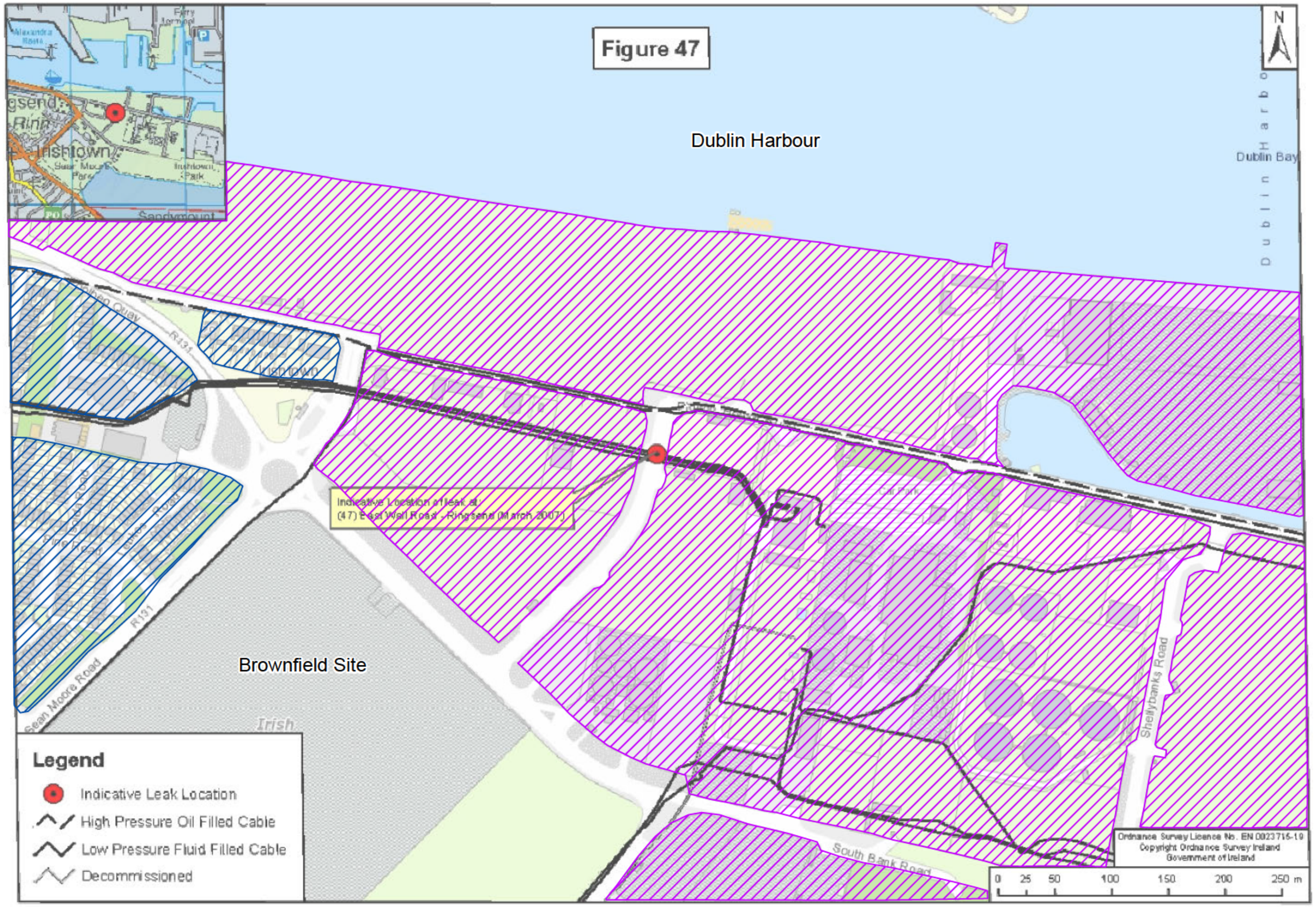
Directors: S. Copping, A. Harris, DRV Jones
VAT No.: 8297875W

Drawings



LEGEND

- Industrial Area
- Residential Area

DRAFT

FOR ISSUE

0 100 200

1:4,000 METRES

REFERENCE(S)
1. COORDINATE SYSTEM: TM65 IRISH GRID

CLIENT
ESB

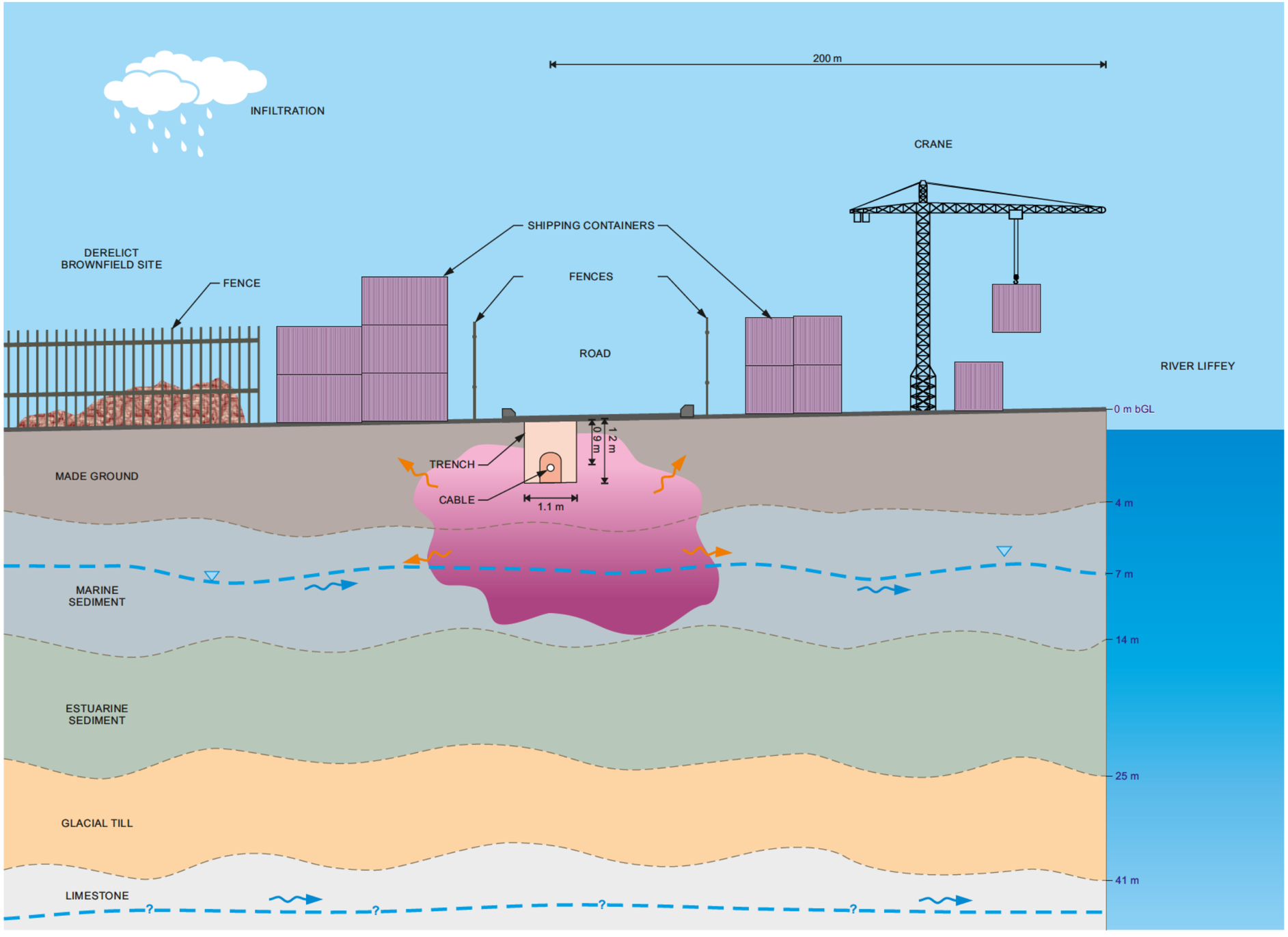
CONSULTANT
GOLDER

YYYY-MM-DD	2019 OCT 31
DESIGNED	KP
PREPARED	KP
REVIEWED	TM
APPROVED	TM

PROJECT
ENVIRONMENTAL ASSESSMENTS OF ESB NETWORKS HISTORIC FLUID FILLED CABLE LOSS

TITLE
EAST WALL ROAD – RINGSEND 38 KV – MARCH 2007

PROJECT NO.	CONTROL	REV.	DRAWING
19126590	600-SW-039	B.0	1



LEGEND

- POTENTIAL WATER TABLE
- POTENTIAL GROUNDWATER FLOW
- VAPOUR MIGRATION

NOTES

1. DEPTHS IN METRES BELOW GROUND LEVEL (m bGL)
2 . EXACT LEAK LOCATIONS UNKNOWN.
3. LEAKING OIL FOR ILLUSTRATIVE PURPOSES.

CLIENT
ESB

PROJECT
ENVIRONMENTAL ASSESSMENTS OF ESB NETWORKS HISTORIC FLUID FILLED CABLE LOSS

CONSULTANT
GOLDER

YYYY MM DD	2019 11 04
PREPARED	ECS
DESIGN	GF
REVIEW	GF
APPROVED	TM

SHEET TITLE
PRELIMINARY CSM (IDENTIFYING POLLUTANT LEAKAGES)
EAST WALL ROAD TO RINGSEND (SITE 47)

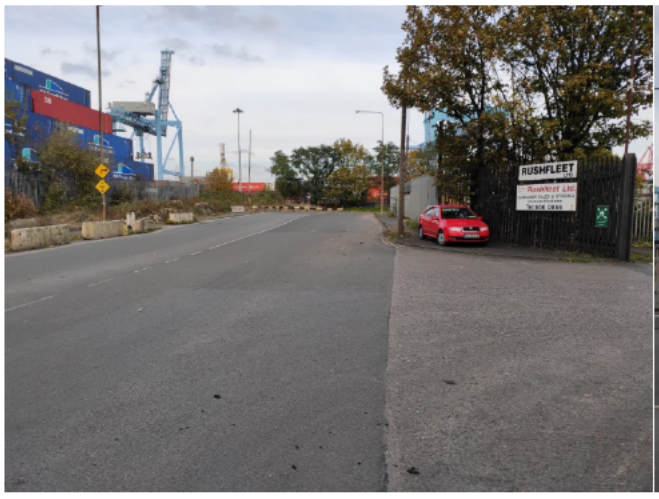
PROJECT NO	CONTROL	REV	DRAWING
19126590	1001 EA 0047	A	2

APPENDIX A

Relevant Photographs Recorded During the Site Walkover

Photograph 1: Indicative leak location (Site 47) towards the north end of Whitebank Road, looking northwest.

Photograph 2: Indicative leak location, looking west.



Photograph 3: South of indicative leak location, looking north.

Photograph 4: Indicative leak location, looking east.

Photograph 5: Derilict land east of Site, looking east along boundary fence with Rushfleet.

Photograph 6: Entrance to Peelports at the western extent of the Site limits.

Photograph 7: Ringsend ESB Station from Pigeon House Road, near boundary with Rushfleet, looking south.

APPENDIX B

MSDS for T 3788 (LAB) and Mineral Oil

MATERIAL SAFETY DATA SHEET

1: IDENTIFICATION OF THE SUBSTANCE / PREPARATION AND OF THE COMPANY / UNDERTAKING

Product Name: T 3788

Application: Hollow-core Energy Cable Saturant

Company: H&R ESP Ltd.

Address: Matrix House
North 4th Street
Milton Keynes, MK9 1NJ
United Kingdom

Telephone: +44 (0)1908 351 111 Fax: +44 (0)1908 351122

2: COMPOSITION / INFORMATION ON INGREDIENTS

Composition: Low viscosity compound based on a blend of linear alkyl benzenes that have side alkyl chains of 10 – 13 carbon atoms in length.

Synonyms: Linear Alkyl Benzenes
Alkyl C10-C13, benzenes
Benzene, C10-13-alkyl-deriv.
Detergent Alkylate

Composition	EINECS number	CAS number	Symbol letters	Risk numbers	Concentration range
C10 – C13 Linear Alkyl Benzenes	267-051-0	67774-74-7	Not regulated		100%

All constituents of this product are listed in EINECS (European Inventory of Existing Commercial Chemical Substances) or ELINCS (European List of Notified Chemical Substances) or are exempt.

3: HAZARDS IDENTIFICATION

Classification of preparation: This product is not classified as a dangerous substance / preparation in accordance with The Chemicals (Hazard Information and Packaging for Supply) Regulations 2002 (CHIP3).

Physical and Chemical Properties: Not classified as flammable, but will burn. Avoid contact with strong oxidisers.

Health Effects

Skin:	Contact with the skin may cause irritation. Prolonged or repeated skin contact may cause drying of the skin, progressing to dermatitis. Symptoms may include itching, discolouration, swelling and blistering.
Eyes:	Contact with the eyes may cause irritation. Symptoms may include reddening, swelling and impaired vision.
Ingestion:	Ingestion of small amounts may cause nausea and vomiting.
Inhalation:	Due to low volatility, this product should not present an inhalation hazard under ambient conditions. Exposure to vapour or mineral oil mists may irritate the mucous membranes and cause dizziness, headaches and nausea.

Environmental Effects

No specific hazards under normal use conditions.

4: FIRST AID MEASURES

Inhalation:	Remove from further exposure. If respiratory irritation, dizziness, nausea, or unconsciousness occurs, seek immediate medical assistance and call a doctor. If breathing has stopped, administer artificial respiration.
Skin contact:	Remove contaminated clothing and wash affected skin with soap and water. If persistent irritation occurs, obtain medical attention. If high pressure injection injuries occur, obtain medical attention immediately.
Eye contact:	Flush eye with copious quantities of water. If persistent irritation occurs, obtain medical attention.
Ingestion:	Wash out mouth with water and obtain medical attention. DO NOT INDUCE VOMITING.

5: FIRE FIGHTING MEASURES

Suitable extinguishing media:	Carbon dioxide (CO_2), dry chemical, foam or water spray.
Unsuitable extinguishing media:	Do not use water jets.
Special exposure hazards:	Combustion is likely to give rise to a complex mixture of airborne solid and liquid particulates and gases, including carbon monoxide, and unidentified organic and inorganic compounds.
Special protective equipment:	Proper protective equipment including breathing apparatus must be worn when approaching a fire in a confined space.

6: ACCIDENTAL RELEASE MEASURES

Personal Precautions:	Spilt product presents a significant slip hazard. Remove any sources of heat.
Environmental Precautions:	Prevent from spreading or entering into drains, sewers and watercourses by using inert absorbent material or other appropriate barriers. Inform local authorities if this cannot be prevented.
Methods for cleaning up:	Absorb liquid with inert absorbent material. Sweep up and remove to a suitable, clearly marked container for disposal in accordance with local and national regulations

7: HANDLING AND STORAGE

Handling:	Do not eat, drink or smoke whilst using this product. To avoid the possibility of skin disorders repeated or prolonged contact with products of this type must be avoided. It is essential to maintain a high standard of personal hygiene.
Storage:	Store in a cool place away from sources of heat and out of direct sunlight to avoid pressure build up. Do not store near oxidisers.

Handling and Storage Materials and Coatings

Suitable:	Carbon steel, baked epoxy or Phenolic coatings, aluminium.
Unsuitable:	Natural rubber, Butyl rubber

8: EXPOSURE CONTROLS / PERSONAL PROTECTION

Occupational Exposure Limits:	Not established.
Engineering control measures:	Use of local exhaust ventilation is recommended whenever this product is used in a confined space, is heated above ambient temperatures, or is agitated.
Hygiene measures:	Wash hands before eating, drinking, smoking and using the toilet. Gloves should be washed before being removed.
Respiratory Protection:	Normally not required if adequate ventilation is in place. Where concentrations in air may exceed the limits given in this section, it is recommended to use a half mask respirator to protect from over exposure by inhalation. Suitable filter material depends on the amount and type of chemicals being handled, but filter material suitable for organic vapours may be considered for use.
Hand Protection:	When handling this product it is recommended to wear chemical resistant gloves. Suggested materials for protective gloves include: PVC, Neoprene or similar.
Eye Protection:	Wear eye protection such as safety glasses, chemical goggles, or face shield if engineering controls or work practices are not adequate to prevent eye contact. Have suitable eye wash water available.

Skin Protection:	Wear impervious protective clothing to prevent skin contact. Selection of protective clothing may include gloves, apron, boots, and complete facial protection depending on operations conducted.

9: PHYSICAL AND CHEMICAL PROPERTIES

General Information

Appearance:	Clear, colourless liquid
Odour:	Mild petroleum odour

Health, safety and environmental information

pH:	Not determined
Boiling point/range:	280°C
Flash point:	>135°C
Flammability:	Non flammable
Explosive properties:	Not explosive
Oxidising properties:	Not applicable
Vapour pressure at 20°C:	<0.02 kPa
Density:	0.86 g/cm^{-3} at 20°C typical
Solubility in water:	Insoluble
Kinematic Viscosity at 20°C:	4.0 – 4.5 cSt (4.0 – 4.5 mm^2/s) typical
Vapour density (Air=1):	>1
Evaporation rate:	Not determined

Other information

Pour point:	-60°C typical
Expansion coefficient:	0.0007 /°C typical
Neutralisation value:	0.03 mg KOH g^{-1} maximum

10: STABILITY AND REACTIVITY

Chemical stability:	This material is considered stable under normal ambient and anticipated storage and handling conditions of temperature and pressure and will not polymerise.
Conditions to avoid:	Temperatures above 140°C
Materials to avoid:	Strong oxidising agents, such as liquid chlorine, concentrated oxygen, sodium hypochlorite, calcium hypochlorite, peroxides etc, as this may present an explosion hazard.
Hazardous decomposition products:	Carbon monoxide and irritant fumes may be generated if this product is burned in an enclosed space.

11: TOXICOLOGICAL INFORMATION

Basis for assessment:	Toxicological data have not been determined specifically for this product. Information given is based on a knowledge of the components and the toxicology of similar products.
Acute toxicity:	Oral LD50 expected to be >5000 mg/kg (rat) Inhalation LC50/4hr expected to be >1.8 mg/l (rat) Dermal LD50 expected to be >2000 mg/kg (rabbit)
Corrosivity/irritation:	
Eye:	May be slightly irritant
Skin:	May be slightly irritant
Respiratory tract:	If mists are inhaled, slight irritation of the respiratory tract may occur
Skin sensitisation:	Not expected to be a skin sensitiser
Repeated-dose toxicity:	Prolonged and/or repeated contact may lead to irritation and possibly dermatitis, especially under conditions of poor personal hygiene.
Mutagenicity:	Not expected to be a mutagen.
Carcinogenicity:	Not expected to be a carcinogen.
Reproductive toxicity:	The preparation has not been assessed at all for this end-point, so its hazardous property in this regard is not known.

12: ECOLOGICAL INFORMATION

Basis for assessment:	Ecotoxicological data have not been determined specifically for this product. Information given is based on a knowledge of the components and the ecotoxicology of similar products.
Ecotoxicity:	Poorly soluble mixture. Product is not expected to be ecotoxic to fish/daphinia/algae, or sewage bacteria. This preparation is expected to be removed in a wastewater treatment facility
Mobility:	Liquid under most environmental conditions. Floats on water. If it enters soil, it will adsorb to soil particles and will not be mobile.
Persistence and degradability:	Readily biodegradable. Soils degradation – half life approx. 15 days. Natural waters degradation – half life approx. 4 – 9 days.
Bioaccumulative potential:	May have the potential to bioaccumulate

13: DISPOSAL CONSIDERATIONS

Disposal must be in accordance with local and national legislation.

Unused Product:	Dispose of through an authorised waste contractor to a licensed site. May be incinerated.
Used/Contaminated Product:	Dispose of through an authorised waste contractor to a licensed site. May be incinerated.
Packaging:	Dispose of through an authorised waste contractor. May be steam cleaned and recycled.

14: TRANSPORT INFORMATION

This product is not classified as dangerous for transport.

15: REGULATORY INFORMATION

Classification/Symbol: Not Regulated

This preparation is not classified as Dangerous according to EU Directives

This safety data sheet is intended to assist in compliance with the following UK legislation:

- Chemicals (Hazard Information and Packaging for Supply) Regulations 2002
- Control of Substances Hazardous to Health Regulations 2002.
- Health and Safety at Work, etc. Act 1974.
- Environmental Protection Act 1990
- Environmental Protection (Duty of Care) Regs. 1991
- COSHH essentials: Easy steps to control chemicals. Control of Substances Hazardous to Health Regulations

Further Guidance
The following guidance notes are available from HMSO or HSE.

Occupational exposure limits (EH 40). Effects of mineral oil on the skin (SHW 397).
Preventing dermatitis at work (INDG 233)
A step by step guide to COSHH assessment (HSG 97)
Assessing and managing risks at work from skin exposure to chemical agents (HSG 205)
The selection, use and maintenance of respiratory protective equipment: A practical guide (HSG 53)
Relevant EC Directives:

- Dangerous Substances Directive (DSD)
- Dangerous Preparations Directive (DPD)
- Safety Data Sheets Directive (SDSD)
- Health & Safety Framework Directive

16: OTHER INFORMATION

This data sheet was prepared in accordance with Commission Directive 2001/58/ECand SI 2002 No. 1689 (CHIP 3)

Key References:

- Chemicals (Hazard Information and Packaging for Supply) Regulations 2002
- The compilation of safety data sheets. Approved Code of Practice (third edition)
- Approved supply list (7th Edition). Information approved for the classification and labelling of substances and preparations dangerous for supply. Chemicals (Hazard Information and Packaging for Supply) Regulations 2002
- Approved classification and labelling guide. Chemicals (Hazard Information and Packaging for Supply) Regulations 2002. Guidance on regulations (Fifth edition).
- EH40/2005 Workplace Exposure Limits 2005
- COSHH essentials: Easy steps to control chemicals. Control of Substances Hazardous to Health Regulations
- European Inventory of Existing Commercial Substances (EINECS)

The data and advice given apply when the product is sold for the stated application or applications. The product is not sold as suitable for any other application. Use of the product for applications other than as stated in this sheet may give rise to risks not mentioned in this sheet. You should not use the product other than for the stated application or applications without seeking advice from us.

If you have purchased the product for supply to a third party for use at work, it is your duty to take all necessary steps to secure that any person handling or using this product is provided with the information in this sheet.

If you are an employer, it is your duty to tell your employees and others who may be affected of any hazards described in this sheet and of any precautions that should be taken.

We believe, in good faith and to the best of our knowledge that the preceding information is accurate. However, we give no guarantee or warranty in this respect. The information provided herein may not be adequate for all individuals and/or all situations. The purchaser/user of the product remains responsible for storing, using or dealing with the product safely and in accordance with all applicable laws and regulations.

Safety Data Sheet
(93/112/EC)

Date of edition: October 1995

1. Identification of Substance/Preparation and Company

Product name:
Masse 106
Supplier:
FELTEN & GUILLEAUME Energietechnik AG
Schanzenstraße 24-30
51063 Köln
Emergency telephone number: 0221/676-3333

2. Composition/Information on Ingredients

Blend of highly refined mineral oils and additives.
On the basis of available information, the components of this preparation are not expected to impart hazardous properties to this product.

3. Hazards Identifikation

Human Health Hazards

If swallowed, aspiration into the lungs may cause chemical pneumonitis.
Prolonged or repeated exposure may give rise to dermatitis.
No specific hazards under normal use conditions.

Safety hazards

The preparation contains mineral oil, for which an exposure limit for oil mist applies.

Environmental hazards

Avoid spillage.
The poduct is not readily biodegradable.

4. First Aid Measures

Inhalation

Remove to fresh air.
If breathing but unconscious, place in the recovery position.
If breathing has stopped, apply artificial respiration.
Medical attention is to be obtained immediately.

Skin

Remove contaminated clothing and wash affected skin with soap and water.

If high pressure injection injuries occur, obtain medical attention immediately.

Eye

Rinse immediately with plenty of water for ar least 10 minutes and seek medical advice.

Ingestion

Do not induce vomiting.
Aspiration into the lungs may occur directly or following ingestion. This can cause chemical pneumonitis which may be fatal.
If breathing but unconscious, place in the recovery position.
If breathing has stopped, apply artificial respiration.
Medical attention is to be obtained immediately.

Advice to physicians

Treat symptomatically

5. Fire Fighting Measures

Extinguishing media

Foam, dry chemical powder, carbon dioxide, sand or earth.

Safety Data Sheet
(93/112/EC)

Date of edition: October 1995

Product name: Masse 106

5. Fire Fighting Measures (continued)

Unsuitable extinguishing media

Do not use water in a jet

Specific hazards

- Combustion is likely to give rise to a complex mixture of gases and airborne particulates, including carbon monoxide, oxides of sulphur and unidentified organic and inorganic compounds.

6. Accidental Release Measures

Personal precautions

Ventilate contaminated area thoroughly.

Minimise contact with skin.

Environmental precautions

Prevent further leakage or spillage and prevent from entering drains.

Prevent from spreading or entering into drains, ditches or rivers by using sand, earth or other appropriate barriers.

Clean-up methods

Absorb or contain liquid with sand, earth or spill control material.

Shovel into a suitable, clearly marked container for disposal or reclamation in accordance with local regulations.

7. Handling and Storage

Handling

When using do not eat or drink.

When handling product in drums, safety footwear should be worn and proper handling equipment should be used

Prevent spillages.

Storage

Keep container tightly closed and in a well ventilated place. Avoid direct sunlight, heat sources and strong oxidising agents.

Recommended materials: mild steel, high density polyethylene for containers or container linings.

8. Exposure Controls/Personal Protection

Engineering control measures

Use only in well ventilated areas.

Occupational exposure standards

Component name	Limit type	Value/Unit	Other information
Oil mist	8 h TWA	5 mg/m³	ACGIH
	10 min STEL	10 mg/m³	ACGIH

Respiratory Protection

Not normally required.

If oil mist cannot be controlled, a respirator fitted with an organic vapour cartrige combined with a particulate prefilter should be used.

Hand Protection

PVC or nitril rubber gloves if splashes are likely to occur and if applicable.

Eye Protection

Safety spectacles

Body Protection

Minimise all forms of skin contact.

Safety Data Sheet
(93/112/EC)

Date of edition: October 1995

Product name: Masse 106

8. Exposure Controls and Personal Protection (continued)

Hygiene measures

Don't keep oily rags in your pockets.
Wash hands before eating and drinking.

9. Physical and Chemical Properties

form	liquid	
colour	yellow	
pourpoint	< -60°C	DIN ISO 3016
flashpoint	145°C	DIN 51758
flammability - lower limit (vol%)	0,6	
flammability - upper limit (vol%)	6,5	
vapour pressure (20°C)	< 0,01 hPa	
density (15°C)	888 kg/m³	DIN 51757
solubility in water (20°C)	negligible	
n-octanol/water partition coeff.	na	
kinematic viscosity (40°C)	8,5 mm²/s	DIN 51562

10. Stability/Reactivity

Stability

stable under normal use conditions

Materials to avoid

strong oxidising agents

Hazardous decomposition products

Hazardous decomposition products are not expected to form during normal storage.

11. Toxicological Information

Toxicological Data:

Acute toxicity - oral

LD 50 is expected to be > 2000 mg/kg.

Irritation of skin, irritation of eye

The product is expected to be slightly irritant.

Sensitisation of skin

The produkt is not expected to be a skin sensitiser.

Prolonged and/or repeated contact

Prolonged/repeated contact may cause defatting of the skin, which can lead to dermatitis and may make the skin more susceptible to irritation and penetration by other materials.

Carcinogenicity

Product is based on mineral oils of types shown to be non-carcinogenic in animal skin-painting studies. Other components are not known to be associated with carcinogenic effects.

Other information

Aspiration into the lungs may occur directly or following ingestion. This can cause chemical pneumonitis which may be fatal.
Information given is based on a knowledge of the toxicology of similar products.

Safety Data Sheet
(93/112/EC)

Date of edition: October 1995

Product name: Masse 106

12. Ecological Information

Basis for assessment

Information given is based on data on the components and the ecotoxicology of similar products.

Mobility

Product floats on water. It is liquid under most environmental conditions.
If it enters soil, it will be adsorbed to soil particles and will not be mobile.
Product has the potential to bioaccumulate.

Ecotoxicity

Product is expected to be practically non-toxic to aquatic organisms, LC/EC50 > 100 mg/L.

13. Disposal Considerations

Product

Precautions: Dispose to licensed disposal contractor.
Waste disposal Nr. (D): 54106

Container disposal

Drain container thoroughly.
Dispose to licensed disposal contractor.

Recomanded cleaning procedure

Cleaning by disposal contractor

14. Transport Information

Product is not dangerous for conveyance under UN, IMO, ADR/RID and IATA/ICAO codes. (According ADR/RID regulations from 1.1.1995)

15. Regulatory Information

Classification

The Product is not classified as dangerous under EC criteria.

16. Other Information

Additional informations

Concawe Report 5/87 Health Aspects of Lubricants.

This information is based on our current knowledge and is intended to describe the product for the purposes of health, safety and environmental requirements only. It should therefore not be construed as guaranteeing any specific property of the product.

APPENDIX C

CIRIA C522 Risk Analysis Definitions

6.3 RISK EVALUATION

The purpose of risk evaluation is to decide whether or not risks are acceptable and to determine the need for remedial action. The acceptability of identified risks may depend on who is considering the risks (see Chapter 7). Ultimately, the decision on acceptability of a risk is a balance of the technical reasoning, practicality, perception and cost-benefit.

This stage involves:

- collation and review of the risk-based information for the site
- addressing uncertainty and its effect on judgements regarding risk estimates
- identification of those risks that are considered unacceptable.

6.3.1 Collating and reviewing risk-based information

At this stage it is useful to summarise all the risk-based information for the site and relate the receptors to the relevant contaminants. In effect, this involves a re-examination of the conceptual model in light of new information. For large sites it may be that the site is subdivided into several zones for clarity and ease of assessment.

6.3.2 Addressing uncertainty

Uncertainty should be considered in terms of:

- whether enough data exists to estimate the risks with an acceptable level of confidence
- identification of assumptions and safety factors used in the assessment.

The assumptions and safety factors incorporated into a risk estimation should be examined, and if uncertainty is considered unacceptable then the risk estimation stage is repeated (ie the collection of more site investigation data, see Section 5.3). The cost and benefit of additional risk estimation needs to be balanced against the need for certainty. For some sites, uncertainty may be acceptable, and the costs of additional risk estimation deemed unnecessary. However, further site investigation data and risk assessment may be necessary to achieve a cost-effective remediation strategy.

6.3.3 Identification of unacceptable risks

The following methodology has been developed from an in-house procedure used by Enviros Aspinwall (not published), submitted during the course of this research. This methodology was in turn developed from the "Guide to Risk Assessment and Risk Management for Environmental Protection" (DoE, 1995) and *Draft Statutory Guidance on Contaminated Land* (DoE, 1996). The method presented is an updated and modified version of the Enviros Aspinwall procedure and represents one possible methodology for presenting and evaluation the results of risk estimation.

This method for risk evaluation is a qualitative method of interpreting the output from the risk estimation stage of the assessment. It involves the classification of the:

- magnitude of the potential **consequence** (severity) of risk occurring (Table 6.3)
- magnitude of the **probability** (likelihood) of the risk occurring (Table 6.4).

Table 6.3 *Classification of consequence*

Classification	Definition	Examples
Severe	Short-term (acute) risk to human health likely to result in "significant harm" as defined by the Environment Protection Act 1990, Part IIA. Short-term risk of pollution (note: Water Resources Act contains no scope for considering significance of pollution) of sensitive water resource. Catastrophic damage to buildings/property. A short-term risk to a particular ecosystem, or organism forming part of such ecosystem (note: the definitions of ecological systems within the Draft Circular on Contaminated Land, DETR, 2000).	High concentrations of cyanide on the surface of an informal recreation area. Major spillage of contaminants from site into controlled water. Explosion, causing building collapse (can also equate to a short-term human health risk if buildings are occupied.
Medium	Chronic damage to Human Health ("significant harm" as defined in DETR, 2000). Pollution of sensitive water resources (note: Water Resources Act contains no scope for considering significance of pollution). A significant change in a particular ecosystem, or organism forming part of such ecosystem. (note: the definitions of ecological systems within Draft Circular on Contaminated Land, DETR , 2000).	Concentrations of a contaminant from site exceed the generic, or site-specific assessment criteria. Leaching of contaminants from a site to a major or minor aquifer. Death of a species within a designated nature reserve.
Mild	Pollution of non-sensitive water resources. Significant damage to crops, buildings, structures and services ("significant harm" as defined in the *Draft Circular on Contaminated Land*, DETR, 2000). Damage to sensitive buildings/structures/services or the environment.	Pollution of non-classified groundwater. Damage to building rendering it unsafe to occupy (eg foundation damage resulting in instability).
Minor	Harm, although not necessarily significant harm, which may result in a financial loss, or expenditure to resolve. Non-permanent health effects to human health (easily prevented by means such as personal protective clothing etc). Easily repairable effects of damage to buildings, structures and services.	The presence of contaminants at such concentrations that protective equipment is required during site works. The loss of plants in a landscaping scheme. Discoloration of concrete.

Table 6.4 *Classification of probability*

Classification	Definition
High likelihood	There is a pollution linkage and an event that either appears very likely in the short term and almost inevitable over the long term, or there is evidence at the receptor of harm or pollution.
Likely	There is a pollution linkage and all the elements are present and in the right place, which means that it is probable that an event will occur. Circumstances are such that an event is not inevitable, but possible in the short term and likely over the long term.
Low likelihood	There is a pollution linkage and circumstances are possible under which an event could occur. However, it is by no means certain that even over a longer period such event would take place, and is less likely in the shorter term.
Unlikely	There is a pollution linkage but circumstances are such that it is improbable that an event would occur even in the very long term

These classifications are then compared to indicate the risk presented by each pollutant linkage. It is important that this classification is only applied where there is a possibility (which can range from high likelihood to unlikely) of a pollutant linkage existing.

This method can be applied with or without site investigation data and can be used to assess the results of either qualitative or quantitative assessment. **It is recommended that the amount of data and basis of classifications are made clear when reporting such an assessment**. It is often possible to undertake this risk evaluation following the Phase 1 stage of the risk assessment. If site investigation and further risk estimation are then undertaken the evaluation can be revised.

Once the consequence and probability have been classified, these can then be compared (see Table 6.5) to produce a risk category, ranging from "very high risk" to "very low risk". The actions corresponding with this classification is given in Table 6.6. A worked example is presented in Box 6.10.

Table 6.3 shows the classification of consequence. To classify the consequence it is important to bear in mind that the classification does not take into account the probability of the consequence being realised (this is considered in Table 6.4). Therefore, for a particular pollutant linkage it may be necessary to classify more than one consequence. For example, the risk from methane build-up in a building presents a risk of harm both to the building and to human health. Both would be classified as *severe*, but the probability, addressed in the next stage of this methodology, may vary (for example, the building may be unoccupied for most of the time, with only occasional visits – eg a pumping station).

The classification of *severe* relates to short-term (acute) risks only. The *medium* classification relates to chronic harm, which can be classed as "significant harm" (if the assessment is carried out for Part IIA purposes. The *mild* classification also relates to significant chronic harm but applies to less-sensitive receptors. The *minor* classification relates to harm which, while not considered "significant", may have a financial implication (eg phytotoxic effects of contaminants on development landscaping).

It is worth noting that, in theory, both a *severe* and *medium* classification can result in death. The differentiation between the two categories is that *severe* relates to a short-term risk whilst *medium* relates to a long-term risk. Therefore the classification of *severe* should indicate that urgent action is required (urgent action may also be required under the *medium* classification, but usually longer-term actions are sufficient).

The classification gives a guide as to the severity and consequence of identified risks when compared with other risk presented on the site. It is not possible to classify an identified risk as presenting "no-risk", rather "very low risk". This is important, as the acceptability of risk may depend on the viewpoint of the stakeholder concerned. It may be necessary to take action to deal with a risk even if classified as "very low", although these actions may not necessarily be required urgently.

Table 6.5 *Comparison of consequence against probability*

		Consequence			
		Severe	Medium	Mild	Minor
Probability	High likelihood	**Very high risk**	**High risk**	**Moderate risk**	Moderate/ low risk
	Likely	**High risk**	**Moderate risk**	Moderate/ low risk	Low risk
	Low likelihood	**Moderate risk**	Moderate/ low risk	Low risk	Very low risk
	Unlikely	Moderate/ low risk	Low risk	Very low risk	Very low risk

Table 6.6 *Description of the classified risks and likely action required*

Very high risk	There is a high probability that severe harm could arise to a designated receptor from an identified hazard, OR, there is evidence that severe harm to a designated receptor is currently happening. This risk, if realised, is likely to result in a substantial liability. Urgent investigation (if not undertaken already) and remediation are likely to be required.
High risk	Harm is likely to arise to a designated receptor from an identified hazard. Realisation of the risk is likely to present a substantial liability. Urgent investigation (if not undertaken already) is required and remedial works may be necessary in the short term and are likely over the longer term
Moderate risk	It is possible that harm could arise to a designated receptor from an identified hazard. However, if is either relatively unlikely that any such harm would be severe, or if any harm were to occur it is more likely that the harm would be relatively mild Investigation (if not already undertaken) is normally required to clarify the risk and to determine the potential liability. Some remedial works may be required in the longer term
Low risk	It is possible that harm could arise to a designated receptor from an identified hazard, but it is likely that this harm, if realised, would at worst normally be mild.
Very low risk	There is a low possibility that harm could arise to a receptor. In the event of such harm being realised it is not likely to be severe.

Box 6.10 *Example of risk evaluation*

A site is used for car parking. The surface is mainly hardstanding, but the quality is not sufficient to prevent infiltration of rainwater. Site investigation has shown that, underlying the hardstanding, the made ground and groundwater (minor aquifer) beneath the made ground contain raised concentrations of toxic metals. The site investigation also encountered several areas of fly-tipped wastes with very high cyanide content (enough to present short-term risks to human health). One such area, bordered by housing, is used for informal recreation, mainly by children.

Therefore the contaminant-pathway-receptor relationship can be summarised as below.

Contaminant	Pathway	Receptor	Consequence of risk being realised	Probability of risk being realised	Risk classification	Risk management action taken
Fly-tipped material with high cyanide content	Direct contact	Humans, mainly children playing on site	Severe	High likelihood	Very high	Immediate removal of fly-tipped material to suitable landfill facility
Toxic metals, for example arsenic and cadmium	Leaching to groundwater (minor aquifer)	Minor aquifer, no local abstractions	Medium	High likelihood	High	Further groundwater monitoring, including perimeter and removal of hotspots of contamination.
Toxic metals, for example arsenic and cadmium	Direct contact	Site workers and visitors during remediation	Medium	Likely	Moderate	Site health and safety plan made allowance for contamination. Site workers were supplied with personal protective equipment and damping down of the site during dry periods was undertaken during remediation.
Toxic metals, for example arsenic and cadmium	Dust	Site workers Residential properties next door to site Site workers and visitors during remediation	Medium	Likely	Moderate	It was considered that damping down of site was sufficient to break this pollutant linkage. Dust monitoring was undertaken on site and at site boundaries to prove this.

Note

The pollutant linkage for residential properties was not assessed in detail, as the measures to address the risk to site workers from contaminated dust were considered sufficient to protect nearby residents.

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