

Our Ref: WG684-61/ARB/MAK

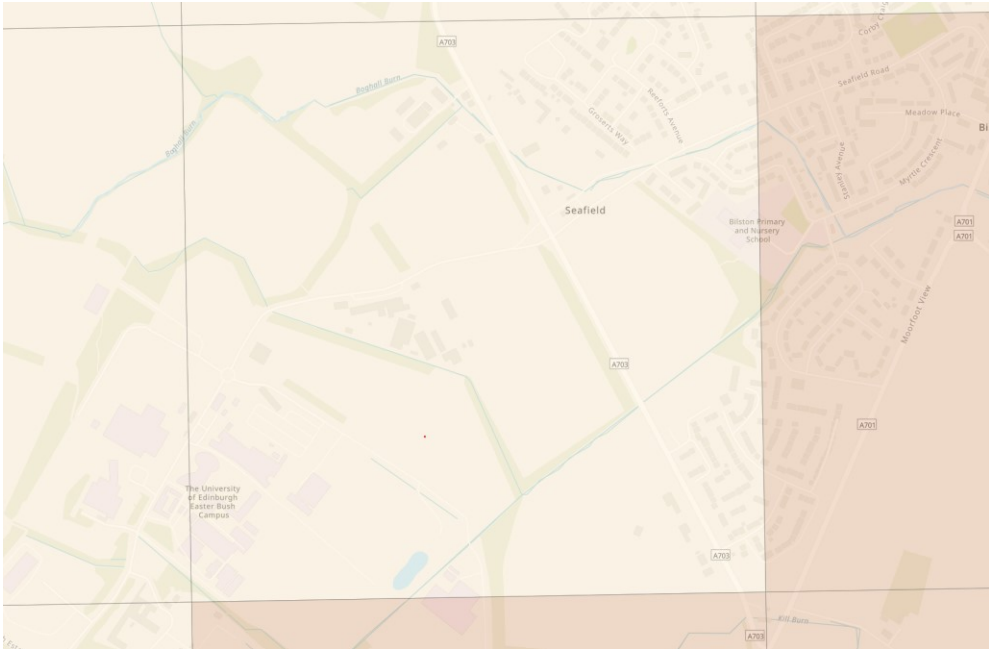


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In response to comments from Midlothian Council in regards to Beeslack planning reference 24/00415/DPP.

Comments have been submitted below in response to the provided queries reference 70054348-527-JR on the 1st August 2024.

| QUERY # | QUERY | JPB Response |
|---------|---|--|
| 1 | Please confirm the radon risk rating for the site based on the updates to the UK Radon maps | <p>Examination of the online radon information shows that the site is still within an area of less than 1% radon</p>  |
| 2 | <p>Please provide commentary on how the samples were retrieved, the type of materials from which the samples were retained and the sample containers / storage methods</p> | <p>Samples were obtained from the stockpile adjacent to the trial pit, ensuring that the last bucket of excavated material was what was sampled to get a good indication of depth. Materials sampled were a mixture of those encountered on site, with samples of topsoil, clays, and granular material, along with made ground when noted. Depths and material types of all the samples are indicated on the trial pit logs.</p> <p>Sample were transferred into a cool box, and then transported to the lab for testing.</p> |
| 3 | <p>Commentary is requested on the effect of monitoring installation response zones installed across Made</p> <p>Ground and natural soils on the monitoring data presented</p> | <p>It is noted that borehole S05 and S06 the installations crossed strata. As noted while this may show problems with determination of a ground gas source, given the description of the made ground, in that very little organic material is present, it is considered that it is mostly mineral in nature and would represent a very low risk gas generation source. The natural material also contains very little organic material, and is considered mostly mineral in nature and as such is considered a very low risk gas generation source.</p> <p>This is noted as both these boreholes recording very low levels of carbon dioxide, even with cutting across both strata. Other boreholes within natural materials also recorded similar readings, with very low levels of gas recorded, with the only exception being the rotary boreholes.</p> |

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| | | <p>While this may potentially serve as a cross contamination source, both boreholes were recorded as dry during drilling, and levels of water recorded within while monitoring were generally around 2.0m, though occasionally noted as dry. As such it is unlikely that water within the made ground is transmitting down.</p> <p>Also no leachable contamination was noted within the soils, and the water samples recorded only low levels of contamination which are not considered a risk. As such while this may be a potential pathway, no source is considered present.</p> |
| 4 | Please clarify if groundwater screening has been undertaken against RPVs or DWS for each analyte for completeness. | RPVs have been adopted from Table 5 in WAT-PS-10 where applicable. If the contaminant is not listed on this, then a DWS has been utilised for assessment. |
| 5 | Commentary is requested on the potential source of the elevated methane concentrations observed in the monitoring as no evidence of coal mining has been observed on site. | While there is no evidence of coal mining within the area, the solid geology is comprised of the Upper Oil Shales group, which may contain thin bands of oil shales. This may represent migration of gas from a deeper source within one of the oil shale bands located at depth. However as noted within the report, this is not reaching surface level due to the thickness of glacial till present. |
| 6 | Commentary is requested on the potential impact of flooded response zones on the gas monitoring results from the deeper boreholes. | While water was encountered within the deeper boreholes, the flows were only marginally elevated, with reasonable amount of headspace still available. As such it is considered that a piston head effect is not being generated due to the water encountered and that the flows are considered to be representative. |
| 7 | We look forward to reviewing the proposed Remediation Strategy and Verification Plan, once available | This will be compiled in due course. |