apscc11@gmail.com

From:
Sent: 03 August 2023 17:09
To: Kevin Thomas
Cc:

Subject: RE: Sounding Board Meeting Follow-up
Attachments: Remediation Strategy Sounding Board Meeting Summary - Revision 1.0.pdf

Good afternoon Kevin,

Thank you for your email and your comments on the Sounding Board Meeting Summary. We have provided specific responses below in blue and have taken the opportunity to provide clarifications where necessary to reflect what was discussed at the Sounding Board. Where appropriate, we have added the comments to the meeting summary and attach herewith an updated version.

Best wishes,
Simon

Simon Colvan
On behalf of the International Paint Limited Newton Ferrers remediation project team

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From:
Sent: Wednesday, July 12, 2023 9:23 PM
To:
Cc:

Subject: Re: Sounding Board Meeting Follow-up

[CAUTION: This e-mail originated from outside of the Company. Do not click links or open attachments unless you trust the sender.]

Dear Simon and Akzo Nobel team,

Thanks again for the presentation and sampling reports

I have some specific comments regarding the "Meeting Summary" :

1 EA commissioned report

- *We understand the NNPC already received this document through their FOIA request*

As per my email to yourselves on the afternoon of 13th June at 14:15, we received a refusal from the EA, so no, we have not received that information.

> Response: The report we are referring to is the 2022 EA commissioned study that was conducted by the Marine Biological Association Study to assess the impact of TBT contamination in the Yealm estuary. We have attached a copy of the report from the 8 March 2023 email from DCIS Enquires that you forwarded to us on 13 June 2023. This study concluded that based on the indicators assessed and 2022 results, there was no evidence of lasting or widespread effects of TBT pollution in the Yealm estuary.

2 Post Remediation Sampling: The community asked about plans to re-validate the remediation after it is completed (e.g., 1 year afterwards)

We requested that follow up testing was carried out for a further 5 years.

Response: We have updated the *Post Remediation Sampling* bullet in the Meeting Summary to reflect this.

Additionally, when comparing with my notes I have the following points that are not recorded in your meeting summary :

1. You made a statement that TBT has a half life of months where it is in oxygenated matter, years where there is no oxygen (such as 20cm deep in the mud and clay).

   Response: The half-life of TBT adsorbed to aerobic sediments is on the order of months, degradation rates are slower in anaerobic sediment. We have added this point to the *Additional Points* section of the Meeting Summary.

2. The highest level of TBT found on site is 10mg per kg

   Response: The highest reported concentration of TBT in sediment at the site is 25 mg/kg, as shown in *Figure 1 – 2022 and 2023 Concentrations of TBT in Sediment* that was provided to Sounding Board attendees after the meeting.

3. The "safe" level (for dumping at sea) is 1mg per kg

   Response: Sediment with TBT concentrations up to 0.1 mg/kg typically receives regulatory approval from the Marine Management Organisation (MMO) for disposal at sea. Sediment with TBT concentrations between 0.1-1.0 mg/kg may be approved for disposal at sea after further investigation, and sediment with TBT concentrations above 1.0 mg/kg is generally considered unsuitable for sea disposal. We have added this point to the *Additional Points* section of the Meeting Summary.

4. There is background TBT throughout the Yealm (less than 1mg per kg) , just as there is throughout the Tamar estuary.

   Response: Due to their previous widespread use, legacy contamination associated with antifouling paints remain in sediments within marine and estuary settings in the UK, including the Yealm estuary, Tamar estuary, and Plymouth Sound. We have added this point to the *Additional Points* section of the Meeting Summary.

5. AN and Geosyntec were unable to identify where the EA found evidence of "astronomical "levels of mercury.

   Response: We are unable to substantiate the basis for the comment on “astronomical levels of mercury”. We believe the comment is taken from an article in the Guardian which reported on the sentencing hearing in January 2023. In the judge’s summing up, he didn’t use the word “astronomical”, he actually said “very high levels of mercury”. In the summons within the prosecution the phrase used was “elevated levels”. According to our research, reported concentrations at the former IPL site appear comparable to other such sites where contamination exists which are all relatively elevated to high, but certainly not astronomical.

6. Is there a risk to humans from TBT and Mercury ? and is it safe to swim in the Yealm ?
   - Ralph and Marcus were adamant that there is not a risk.

     Response: Adverse effects are not expected from swimming and wading near the site based on the known levels and distribution of contaminants in foreshore sediments. Appropriate precautions should be used when digging or foraging in sediments that may contain TBT. We have added this point to the *Additional Points* section of the Meeting Summary.

   - You stated that TBT and Mercury are not soluble and sink into the mud, it does not dissolve.

Response: TBT and mercury are not very soluble in water and prefer to stick to marine sediments. We have added this point to the *Additional Points* section of the Meeting Summary.

- The mercury that is present is inorganic and is not in a dangerous form compared with the type known to have poisoned people (that being Methyl Mercury that is extremely toxic).

  Response: Inorganic mercury is the predominant form of mercury that has been detected in sediment at the site. Inorganic mercury is a relatively low hazardous form of mercury. Methylmercury (a form of organic mercury) has not been detected in sediment near the site. Bioaccumulation of inorganic mercury in fish and wild life is relatively low. We have added this point to the *Additional Points* section of the Meeting Summary.

7. The Harbour master asked if there could be an health impact on Mooring Workers and Winkle Pickers. Marcus's response was that Mooring workers would be safe providing they used normal PPE and working practices.

   Response: As presented in the meeting summary, we will follow up directly with the Harbour Master for more details on the mooring workers and winkle pickers activities. This includes their PPE and working practices.

8. Removal will be at Low Tide to minimise any water dispersal and will be by Barge using mechanical means (digger / shovel) and / or suction pump.

   Response: As documented in the *Remediation Strategy Sounding Board – Presentation Slides* the remediation will be scheduled around low tide. The proposed remediation methods will be confirmed after the remediation contractor is procured, and we hope to be able to share more details specifics at the next community engagement event.

9. Replacement material will be deposited in the excavated hole during the same tide window.
   - Refill material is likely to be a mixture of sand / loam etc to replicate that removed

     Response: The proposed remediation methods and backfill specifications will be confirmed after the remediation contractor is procured and based on ongoing discussions with MMO.

10. Probably 40 Barge movements with waste being off loaded in Plymouth and sent to Landfill

    Response: As documented in the *Remediation Strategy Sounding Board – Presentation Slides*, the material will be transported from the site via the estuary on a barge, then offloaded and transferred via the road for landfill disposal. The proposed remediation methods and number of barges will be confirmed after the remediation contractor is procured.

11. AN and GeoSyntec will be on site during this period and workers will come by road - have asked if they can come in by minibus as parking is limited in the village.

    Response: We have added this point to the *Additional Points* section of the Meeting Summary.

12. No Machines or material will come by road.

    Response: Remediation equipment and materials will be mobilised to the site via the estuary on barges. We have added this point to the *Additional Points* section of the Meeting Summary.

Can you update your summary to reflect these points please

Kind regards,

Kevin Thomas,

Vice Chair, Newton & Noss Parish Council

On 03/07/2023 13:54, Newton Ferrers wrote:

Dear all,

Thank you very much for attending the Sounding Board meeting last month, where we presented plans for the corrective action works relating to the foreshore sediment at our former development paint development site in Newton Ferrers. Thank you too for the comments and suggestions provided during the meeting.

As promised, please find attached the following documents:

1. Powerpoint slides, outlining our remediation strategy, which were presented at the meeting
2. Meeting summary, capturing the key points and actions
3. Illustration showing 2022 and 2023 concentrations of TBT in sediment, with supporting narrative

Please don't hesitate to get in touch if you have any further queries. The best way to contact us is via the following email address

Best wishes,
Simon

Simon Colvan
On behalf of the International Paint Limited Newton Ferrers remediation project team