

Environment Agency permitting decisions

Variation

We have decided to issue the variation for **Skelton Grange Landfill Site** operated by **Biffa Waste Services**.

The variation numbers relating to the variation notice are **EPR/BJ9339IF/V013** and **EPR/BJ9339IF/V014**.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

This Environment Agency has a duty, under the Environmental Permitting (England and Wales) Regulations 2010, regulation 34(1), to periodically review permits. As a result of that review we have identified a number of necessary changes we must make to your permit to reflect current legislation and best practice. These changes principally relate to:

- The addition of a standard condition for landfill gas management at landfills that accept biodegradable waste;
- A change to the hydrogeological risk assessment condition so that reviews are undertaken every 6 years rather than every 4 years;
- Standard leachate and groundwater quality monitoring tables (schedule 3); and
- A standard reporting table (schedule 4)

We also aim:

- Consolidate permits - all variations to your permit will be brought together in to one permit so the requirements will be clearer.
- We will formalise changes to monitoring requirements and compliance limits where we have agreed them in writing, for example as the result of a hydrogeological risk assessment review.
- Waste acceptance rules will reflect the Landfill Directive and governments' waste strategies.
- We will implement the Industrial Emissions Directive (IED) and other regulatory changes.
- We will include permit conditions to implement the statutory requirements of the Waste Framework Directive, for example to reflect the requirements of the waste hierarchy.

Site specific issues which result in a change to the current template will also be addressed, for example incorporating completed improvement conditions into the permit and removing inconsistencies.

Other changes may relate to a specific permit or amendments to monitoring requirements or emission limits which have been agreed with the Environment Agency but not incorporated into the permit.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Structure of this document

- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation and web publicising responses

Key issues of the decision

Variation Numbers EPR/BJ9339IF/V013 & EPR/BJ9339IF/V014

We have incorporated two different variation applications in the consolidated permit. EPR/BJ9339IF/V013 represents the substantial variation application made by the operator while EPR/BJ9339IF/V014 represents the Environment Agency initiated variation as part of the Landfill Sector Review 2013. The fee for the substantial variation has been paid in full while the operator will be invoiced at a later date for Landfill Sector Review Work.

The key issues as a result of the application made by the operator, EPR/BJ9339IF/V013, are as follows:

EWC Waste Codes

The list of EWC codes proposed for the Soil Treatment Facility (STF) included waste codes from non-soil origin and waste codes that could potentially be contaminated by inorganic contaminants like metals.

Of particular concern are sludges from non-soil sources which following bioremediation will not become a soil. So these materials are not suitable for recovery and need not be blended with materials that could be potentially be recovered as soil. However we have permitted these sludges for the following

reasons:

- There will be no blending or mixing of wastes prior to submission for bioremediation.
- Sludges comprising of mixtures of soil and water will be separately treated in a unique batch and used for restoration.
- Sludges comprising of process wastes from non-soil origins will be treated in a separate batch, not to be mixed with soil based sludges and be used as non-hazardous daily cover.

Additionally, we permitted solidified wastes on the condition that these wastes can only be accepted at the site if prior to solidification they did not possess a hazardous property derived from dangerous substances other than oil derived hydrocarbons and were solidified by a permitted process using non-reacting binders such as clay.

However, we excluded waste codes potentially rich in inorganic contaminants (e.g. stabilised and partly stabilised wastes) from the list of permitted wastes codes. These wastes are considered not suitable for recovery using bioremediation.

Listed Activities

The operator indicated in the response to Schedule 5 Notice received on 21 July 2014 that the listed activities that should be included in the permit are:

- 5.3 A(1)a(vi) - Recovery of hazardous waste with a capacity exceeding 10 tonnes per day.
- 5.6 A(1)a - Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes.

However, following the review of the application documents and responses from the operator to Schedule 5 notices it was identified that the activities to be carried out at the STF comprise of the following:

- Recovery of hazardous waste which will be used for landfill restoration (R5). The relevant activity reference, under the revised EPR 2010, is S5.3 A(1)(a)(vi).
- Disposal of hazardous waste (D8) from non-soil origin (e.g. oil sludge) following bioremediation as non-hazardous daily cover in the landfill site. This is subject to the treated waste meeting the relevant landfill waste acceptance criteria. The listed activity reference under the revised EPR 2010 is S5.3 A(1)(a)(i).

- Temporary storage of hazardous waste pending submission to bioremediation. The listed activity reference under revised EPR 2010 is S5.6 A(1)(a).
- A mix of recovery and disposal of non-hazardous waste soils (R5 and D8). The non-hazardous wastes from soil origin treated on site shall be used for landfill restoration while non-hazardous sludges from non-soil origin treated on site shall be used for landfill daily cover. The listed activity reference under revised EPR 2010 is S5.4 A(1)(b)(i).
- The temporary storage of non-hazardous waste which is permitted as directly associated activity to the STF.

Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/ notice.

Aspect considered	Justification / Detail	Criteria met
		Yes
Consultation		
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.	✓
Responses to consultation and web publicising	The web publicising and consultation responses (Annex 2) were taken into account in the decision. The decision was taken in accordance with our guidance.	✓
The facility		
The regulated facility	<p>The extent/nature of the facilities taking place at the site required clarification.</p> <p>The decision on the facility was taken in accordance with RGN2 Understanding the meaning of regulated facility</p> <p>The regulated facility is an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations and the following directly associated activities.</p> <ul style="list-style-type: none"> • Section 5.2 Part A(1) (a) , The disposal of waste in a landfill - Landfill for non-hazardous waste and landfill restoration. • Section 5.2 Part A(1) (a) , The disposal of waste in a landfill - Landfill for Stable Non Reactive Hazardous Waste. • 5.3 Part A(1)(a)(vi) - recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving recycling or reclamation of inorganic materials other than metals or metal compounds - Ex-situ bioremediation of hazardous waste soil. • S5.3 A(1)(a)(i): Disposal of hazardous waste with a capacity exceeding 10 tonnes per day involving biological treatment - Ex-situ bioremediation of hazardous waste soil. • S5.6 A(1)(a): Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes. 	

Aspect considered	Justification / Detail	Criteria met
		Yes
	<ul style="list-style-type: none"> • S5.4 A(1)(b)(i): Recovery and disposal of non-hazardous waste soils with a capacity exceeding 75 tonnes per day involving biological treatment - bioremediation of non-hazardous waste soils. • Combustion of landfill gas for the purpose of electricity generation. • Storage and treatment of leachate in a facility with a capacity of <50 t/day • Discharge of treated leachate from the leachate treatment facility to foul sewer. • Flaring of landfill gas for disposal in an appliance. • Discharges of site drainage from the landfill. • Temporary storage of non-hazardous waste pending recovery. 	
Operator		
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.	✓
European Directives		
Applicable directives	<p>All applicable European directives have been considered in the determination of the application.</p> <p>The conditions implementing the requirements of Industrial Emissions Directive (IED) have been incorporated in the permit.</p>	✓
The site		
Extent of the site of the facility	<p>The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility.</p> <p>A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.</p>	✓
Site condition report	The operator has provided a description of the condition of the site.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under IED–guidance and templates (H5).</p>	
<p>Biodiversity, Heritage, Landscape and Nature Conservation</p>	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat .</p> <p>A full assessment of the application and its potential to affect the sites/species has been carried out as part of the permitting process. We consider that the application will not affect the features of the site/species</p> <p>We have not formally consulted on the application. The decision was taken in accordance with our guidance.</p> <p>The Protected Species within 500m of the site is are mainly affected by Changes in water level/flow/chemistry/temperature; nutrient enrichment; acidification; toxic contamination; siltation/smothering; sediment/sand/gravel extraction; entrapment; migration barriers; watercourse modification; aquatic/bank vegetation management; exploitation (angling bait).</p> <p>However no point source discharge to water is permitted as part of the proposed activities. Process water from the biopiles will be channelled to process water tanks prior to discharge to a suitably licensed facility. Hence there is no potential for impact.</p> <p>There are eleven (11) Local Wildlife Sites (LWS) within 2km of the site.</p> <p>Deposition of acid gases (NH₃, NO_x and SO₂) from aerial emissions can cause damage to vegetation and/or other sensitive features of these sites.</p> <p>The main point source emission to air from the soil treatment process is through the biofilter. The biofilter provides an active filter that removes potentially odorous and gaseous biodegradation products from the air leaving the biopiles and minimises emissions of VOCs and odour. With this and other mitigation measures proposed in the application including the requirement to monitor the releases through the biofilter we consider that the proposed operation will not result in significant pollution of</p>	<p>✓</p>

Aspect considered	Justification / Detail	Criteria met
		Yes
	LWS.	
Environmental Risk Assessment and operating techniques		
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p> <p>The assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment all emissions may be categorised as environmentally insignificant.</p> <p>Precautionary screening of VOCs showed that all VOC emissions can be considered 'insignificant' and require no further assessment with the exception of the long term impacts of benzene. As the Process Contribution (PC) for benzene is above 70% of the long term Environmental Assessment Level (LT EAL) this pollutant was considered further using atmospheric dispersion modelling.</p> <p>Base on monitoring data from similar permitted Soil Treatment Facility, two VOC emissions scenarios were assessed for the Detailed Dispersion Modelling.</p> <ul style="list-style-type: none"> Scenario 1 was based on the measure average concentration of 1,248µg/m³ assumed to be constant throughout the year. This represents a more likely scenario when looking at the annual average impact. Scenario 2 was based on the peak concentration of 15,787µg/m³ assumed to be constant throughout the year. This is a highly precautionary assumption given that the next highest concentration is only 2.5% of this peak value. <p>A 1km by 1km receptor grid with a 25m resolution was applied. In addition discrete receptor locations were modelled for boundary receptors at 50m intervals.</p> <p>The annual mean background concentration of benzene for the grid square containing the site is 0.39µg/m³.</p> <p>Comparison was made to the EALs for both the maximum ground level concentration outside the property boundary and at the identified sensitive human receptor locations in the surroundings.</p> <p>The peak predicted environmental concentration in</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>Scenario 1 is less than 1% of the EAL and considered insignificant. The peak predicted environmental concentration at a receptor location in Scenario 2 (worst case scenario) is less than 20% of the EAL and considered well below the Air Quality Strategy Objective.</p> <p>Base on the above assessment the predicted process contribution of modelled VOCs from the installation will not lead to exceedance outside the installation boundary of the relevant Air Quality Objectives and EALs.</p>	
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. The proposed techniques are in accordance with BAT described in the Sector Guidance Note IPPC S5.06, 'Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste', Environment Agency, Issue 5, V5, May 2013.</p> <p>The proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs and BAT Conclusions, and ELVs deliver compliance with BAT-AELs.</p>	✓
The permit conditions		
Updating permit conditions during consolidation.	<p>We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation. The new conditions have the same meaning as those in the previous permit(s).</p> <p>The operator has agreed that the new conditions are acceptable.</p> <p>The following changes were made as a result of an Environment Agency initiated variation, ERP/BJ9339IF/V014.</p> <p>Certain template conditions have been amended to reflect current best practice. These changes have been developed in consultation with industry having regard to the relevant legislation as follows:</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>Condition 1.5 Generic condition added to reflect the requirements of the Waste Framework Directive</p> <p>2.7.1(a). We have added reference to a specific table to clarify what wastes are permitted at which permitted activity.</p> <p>2.7.2. Added to allow the receipt of waste for treatment at the STF.</p> <p>2.7.3. Added to separately identify the waste types and quantities that can be accepted for restoration. While part of the landfill activity, the waste types and quantities need to be separately identified to confirm they are appropriate for use.</p> <p>2.10. Revised gas management condition imposed for all landfills that accept biodegradable to ensure compliance with the relevant requirements of the Landfill Directive.</p> <p>3.1.1. Generic condition imposed on all activities to simplify the sub-conditions. This avoids the need for additional sub-conditions that refer to compliance limits in individual tables in schedule 3</p> <p>3.1.4 – 3.1.5. Revised conditions to reflect the terminology used by the Groundwater Directive and to require hydrogeological risk assessment reviews every 6 years rather than every 4 years.</p> <p>Two sub-conditions that referred to limits in specific tables in schedule 3 deleted as they are now covered by 3.1.1.</p> <p>3.6 Revised generic pests condition imposed on all activities.</p> <p>4.2.2. Amended to ensure that information on ‘annual production/ treatment’ (Schedule 4, Table S4.2) is provided in February each year where annual reports may be submitted at other times of the year. This includes data on landfill gas collection that must be reported to government by April each year.</p>	

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>4.2.2(a) Text expanded to clarify the details we require in an annual report.</p> <p>4.2.2(h) New condition requiring annual submission of a plan of monitoring and extraction locations with reference to monitoring tables in Schedule 3.</p> <p>Schedule 1, table S1.1. Amended description to the landfill activity to clarify that this includes restoration. Activity references amended to reflect changes introduced by Industrial Emissions Directive (2010/75/EU).</p> <p>Leachate storage moved from a specified activity to a Directly Associated Activity.</p> <p>Table S1.5. Amended to clarify that restoration is a separate part of the landfill activity unrelated to landfill cover.</p> <p>Schedule 2. Template list of appropriate waste added for landfills for hazardous and non-hazardous waste. Waste types prohibited by the Landfill Directive have been removed for clarity.</p> <p>Schedule 3. Monitoring and compliance tables have been re-ordered so that those with compliance limits appear first. Standard monitoring frequency and parameters have been included for certain routine monitoring requirements.</p> <p>Schedule 4, table S4.1. Amended to only require regular reports of information that relate to compliance limits.</p> <p>Table S4.2 Additional details of landfill gas extracted required to improve climate change data quality.</p> <p>Table S4.3. Amended to include natural gas as an energy source for consistency with other sectors.</p> <p>Schedule 6. Definitions added to clarify meaning of:</p>	

Aspect considered	Justification / Detail	Criteria met
		Yes
	<ul style="list-style-type: none"> • Inert waste • Exceeded • Hazardous substance • Medicinal product • Previous year • Waste acceptance criteria • Waste acceptance procedure <p>See also Schedule 1 in the reviewed permit.</p> <p>As a result of application made by the operator, EPR/BJ9339IF/V013, the following conditions have been added:</p> <p>2.1.2 Added to distinguish wastes permitted for Soil Treatment Facility (STF)</p> <p>2.3.2 Added to specify raw material for bioremediation</p> <p>2.3.3 Added to specify how hazardous waste accepted at the STF will be managed.</p> <p>2.7.2 Added to allow the receipt of waste for treatment at the STF.</p> <p>2.7.10 Added to specify how waste from STF will be managed.</p> <p>2.7.11 Added to specify how residual waste from STF will be managed.</p> <p>3.1.6 Generic condition to reflect the requirements of the IED.</p> <p>3.5.1 (g) Added to specify monitoring requirement for the STF.</p> <p>3.5.1 (h) Added to specify monitoring requirement for the STF.</p> <p>4.3.6 Notification requirement for the STF.</p> <p>Table S1.4 Pre-operational measures, 3 to 8, added to request additional information from the operator.</p> <p>Table S2.3 Hazardous waste types and quantities permitted for soil treatment facility.</p> <p>Table S2.4 Non-hazardous waste types and quantities permitted for soil treatment facility.</p> <p>Table S3.2 Amended to add monitoring requirement for STF.</p>	

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>Table S3.13 Process monitoring requirements for STF.</p> <p>Table S3.14 Monitoring requirements for bioremediation of contaminated soil.</p> <p>Table S4.2 Amended to add reporting for Annual production/treatment for STF.</p>	
Raw materials	<p>We have specified limits and controls on the use of raw materials and fuels.</p> <p>Annual limit for additives (bacterial growth and promotion) used in bioremediation specified.</p>	✓
Waste types	<p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.</p> <p>We are satisfied that the operator can accept these wastes for the following reason:</p> <ul style="list-style-type: none"> The permitted waste codes are Standard list of wastes for non-hazardous landfill. <p>The following waste codes have been excluded from table S2.2 as part of Permit Review (Agency Initiated) Variation:</p> <ul style="list-style-type: none"> EWC codes 16 06 04, 16 06 05, 08 01 20, 08 02 03 and 17 08 02. <p>We have excluded the wastes for the following reasons:</p> <ul style="list-style-type: none"> To comply with the requirements of Landfill Directive on liquid wastes (08 01 20 and 08 02 03). landfill is not the best option as there is a readily available alternative management route (16 06 04 and 16 06 05). Non-hazardous gypsum-based and other high sulphate bearing materials should be disposed of only in landfills for non-hazardous waste in cells where no biodegradable waste is accepted. This means that gypsum waste sent to landfill must be deposited in a separate cell. However this facility does not have designated gypsum cell for this purpose. Hence 17 08 02 waste code has been excluded. <p>For the soil treatment facility, we have excluded the</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>following wastes:</p> <ul style="list-style-type: none"> EWC codes 19 03 04*, 19 03 05, 19 10 05*, 19 10 06, <p>Waste codes 19 03 04* (wastes marked as hazardous, partly stabilised) and 19 03 05 (stabilised wastes other than those mentioned in 19 03 04) were considered not suitable for acceptance at the soil treatment because stabilised and partly stabilised wastes have potential to contain high level of inorganic contaminants like metals. The levels of these inorganic contaminants are very likely to remain unchanged following bioremediation. Also, as organics are generally not easily immobilized these wastes are unlikely to contain organic components as the main contaminants.</p> <p>Waste codes 19 10 05* and 19 10 06 are wastes originating from shredding of metal-containing wastes. As the potential contaminants are metal they are considered not suitable for bioremediation.</p> <p>See key issues for further detail.</p> <p>We made these decisions with respect to waste types in accordance with Landfill Directive and Waste Framework Directive.</p>	
Pre-operational conditions	<p>Based on the information in the application, we consider that we need to impose pre-operational conditions.</p> <p>As the leachate treatment system has not yet been constructed the improvement conditions, 1.14.1.18 - & 1.14.1.19, have been converted to pre-operational conditions, PO1 and PO2, to ensure that appropriate measures are in place prior to the operation of leachate treatment plant.</p> <p>To ensure that the blending or mixing of waste does not lead to dilution of contaminant levels in waste the operator is to submit a methodology for the blending and mixing of waste, prior to submission to the bioremediation process (PO3).</p> <p>PO4 added to ensure site specific risk assessment is undertaken to demonstrate that treated waste will be suitable for the intended use.</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>PO5 added to ensure that residual waste to be used as daily cover complies with the waste acceptance criteria for the landfill.</p> <p>PO6 added to ensure that detailed construction proposal for the treatment pad is reviewed and approved by the Environment Agency prior to construction.</p> <p>PO7 added to ensure that the environmental performance of the treatment pad is validated by way of CQA.</p> <p>PO8 added to ensure necessary procedures for operation of each phase of the STF as detailed in the application are in place prior to the operation of each phase.</p> <p>PO9 added to ensure appropriate measures proposed in the application are in place when accepting, handling and storing the wastes.</p>	
Improvement conditions	<p>Based on the information on the application, we consider that we need to impose improvement conditions.</p> <p>We have imposed improvement conditions to ensure that:</p> <ul style="list-style-type: none"> ➤ approved restoration plan is in place for the site. 	✓
Incorporating the application	<p>We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p>	✓
Emission limits	<p>We have decided that emission limits should be set for the parameters listed in the permit.</p> <p>The emission limits for the facility have not been revised as a result of this variation application or the permit review.</p>	✓
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>detailed and to the frequencies specified.</p> <p>Standard monitoring tables for groundwater, leachate and surface water have been added as a result of Environment Agency Landfill Sector Review.</p> <p>These monitoring requirements have been imposed in order to simplify the monitoring requirements for the operator in line with our regulatory position statement on landfill monitoring and reporting standards.</p> <p>As a result of the operator led variation we have also imposed monitoring requirements in order to ensure that emissions through the bio-filter at the STF are monitored.</p> <p>We made these decisions in accordance with Sector Guidance Note IPPC S5.06.</p>	
Reporting	<p>We have specified reporting in the permit.</p> <p>Standard table S4.1 has been added as a result of the permit review.</p> <p>Groundwater reporting frequency has been changed from monthly to quarterly.</p> <p>We made these decisions in accordance with regulatory position statement on landfill monitoring and reporting standards.</p>	✓
Operator Competence		
Environment management system	<p>There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.</p>	✓
Technical competence	<p>Technical competency is required for activities permitted. The operator is a member of an agreed scheme.</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Financial provision	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.	✓

Annex 2: Consultation and web publicising responses

Summary of responses to consultation and web publication and the way in which we have taken these into account in the determination process. (Newspaper advertising is only carried out for certain application types, in line with our guidance.)

Response received from
Health and Safety Executive – 17/04/2014
Brief summary of issues raised
Confirmed that the HSE has no comments on the application.
Summary of actions taken or show how this has been covered
No action required

Response received from
Planning authority - Leeds City Council
Brief summary of issues raised
<p>The council highlighted the following noise sensitive location developments for which planning consent have been granted:</p> <ul style="list-style-type: none"> • Pontefract Lane Knowsthorpe Lane And M1 - Outline application to lay out business park (UCO Class B1), Hotel (Class C1) and supporting users within UCO classes A1, A2, A3, A4, A5, D1 and D2. • Pontefract Lane Richmond Hill Leeds - Extension of time of planning permission 32/369/01/FU (carrying out of engineering operations and laying out of access roads and landscaping) <p>Additionally, the council requested Environment Agency support for odour, dust and noise related to planning conditions.</p>
Summary of actions taken or show how this has been covered
The emission of odour, dust and noise from the proposed facility were fully addressed in the application documents. We have also imposed conditions in the permit to ensure the operator implements the proposed control measures.

Response received from
Public Health England (PHE) – Nottingham City Hospital (29/04/2014)
Brief summary of issues raised
<p>PHE noted the following:</p> <p>The main emissions of concern are fugitive emissions of dust and particulate matter from associated site activities, emissions of volatile organic compounds and particulate matter during biopile remediation and emissions of volatile organic compounds, petroleum hydrocarbons and polycyclic aromatic hydrocarbons from the biofilter.</p> <p>Based on the information contained in the application supplied to us, Public Health England has no significant concerns regarding the risk to the health of the local population from the proposed waste treatment activity.</p> <p>This consultation response is based on the assumption that the permit holder</p>

shall take all appropriate measures to prevent or control pollution, in accordance with the relevant sector guidance and industry best practice.

Summary of actions taken or show how this has been covered

The emission of dust and particulate matter from the associated site activities were fully addressed in the application documents. We have also imposed conditions in the permit to ensure the operator implements the proposed control measures.

The main point source emission to air from the soil treatment process is through the biofilter. The biofilter provides an active filter that removes potentially odorous and gaseous biodegradation products from the air leaving the biopiles and minimises emissions of VOCs and other hydrocarbon contaminants. With this and other mitigation measures proposed in the application including the requirement to monitor the releases through the biofilter we consider that the proposed operation will not result in significant pollution.

Additionally, the screening and detailed modelling of emission of volatile organic compounds (VOCs) from the biofilter were undertaken. Precautionary screening of VOCs showed that all VOC emissions can be considered 'insignificant' and require no further assessment with the exception of the long term impacts of benzene.

Base on the detailed modelling assessment the predicted process contribution of modelled VOCs (benzene) from the installation was found not lead to exceedance outside the installation boundary of the relevant Air Quality Objectives and EALs.

Reponses not received

The Environmental Protection, Leeds City Council and Director of Public Health were also consulted; however, consultation responses from these parties were not received.