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Permitting Support Officer Environment Agency Permitting Support Centre Quadrant 2 99 Parkway Avenue Sheffield S9 4WF

10th September 2021

Dear Permitting Support,

Environmental Permit variation application submitted by FCC Recycling (UK) Limited for Daneshill Landfill Site, Daneshill Road, Lound, Nottinghamshire, DN22 8RB Application Reference: EPR/NP3538MF/V009

Thank you for forwarding a copy of this application to vary the existing permit to include a soil treatment facility to the Centre for Radiation, Chemical and Environmental Hazards (CRCE) at Public Health England on 18th August 2021.

As this site is already operational, it is assumed that the Environment Agency (EA) are satisfied with the operator's competence and compliance with existing permit conditions. The issue of concern relates to emissions to air and the potential for odour.

Following our assessment of the submitted documents, we request that the EA takes account of the following concerns when considering appropriate permit conditions:

- The air dispersion modelling of pollutants (specifically, odours and volatile organic compounds) assume all emissions are released from the surface of the biofilter. It will therefore be important that the EA are satisfied that all measures are in place to minimise odour impacting local residents. We would encourage that routine compliance checks and odour audits are undertaken to ensure agreed management actions.
- That the air dispersion modelling to be updated to reflect the new short-term (24 hour) Environment Assessment Level for benzene.
- That the EA ensure that the operator has suitable waste acceptance to minimise presence
 of friable asbestos and stockpile mitigation to prevent the release of any fibrous content
 prior to treatment.

Any information arising from these recommendations should be sent to Public Health England for consideration when it becomes available. Such information could affect the comments made in this response.

Kind regards

Dr Sarah Robertson Principal Environmental Public Health Scientist