

No.	Date	Content	Page No(s)
<b>Note: Emails which have been manually crossed out are duplicate emails</b>			
1.	21 October 2022 09:26	Katie Dunmore (EA) to Andy Stocks (Caulmert/FCC)	1-2
2.	24 August 2022 14:44	Katie Dunmore (EA) to Andy Stocks (Caulmert/FCC)	3
3.	18 July 2022 10:25	Andy Stocks (Caulmert/FCC) to Katie Dunmore (EA)	4
4.	18 July 2022 10:22	Katie Dunmore (EA) to Andy Stocks (Caulmert/FCC)	5
5.	8 July 2022 15:17	Andy Stocks (Caulmert/FCC) to Katie Dunmore (EA)	6
6.	5 May 2022 09:33	Katie Dunmore (EA) to Andy Stocks (Caulmert/FCC)	7-8
7.	27 April 2022 10:26	Andy Stocks (Caulmert/FCC) to Katie Dunmore (EA)	9-10
8.	24 February 2022 15:41	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	11
9.	24 February 2022 08:43	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	12
10.	22 February 2022 16:06	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	13-15
11.	7 February 2022 16:45	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	16
12.	2 February 2022 11:04	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	17
13.	31 January 2022 10:09	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	18
14.	31 January 2022 09:27	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	19
15.	20 January 2022 11:14	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	20
16.	7 January 2022 16:22	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	21
17.	7 January 2022 15:47	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	22
18.	7 January 2022 14:50	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	23
19.	10 December 2021 10:41	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	24
20.	9 December 2021 15:53	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	25
21.	25 November 2021 12:23	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	26-27
22.	23 November 2021 17:56	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	28
23.	18 November 2021 12:53	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	29
24.	17 November 2021 14:39	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	30
25.	8 November 2021 11:04	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	31

26.	5 November 2021 08:53	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	32-33
27.	22 October 2021 14:54	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	34
28.	21 October 2021 13:55	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	35
29.	18 October 2021 08:20	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	36
30.	13 October 2021 18:49	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	37
31.	13 October 2021 10:06	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	38
32.	6 October 2021 10:08	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	39
33.	4 October 2021 13:59	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	40
34.	1 October 2021 17:40	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	41
35.	30 September 2021 17:27	Katie Dunmore (EA) to Andy Stocks (Caulmert/FCC)	42
36.	30 September 2021 17:18	Andy Stocks (Caulmert/FCC) to Katie Dunmore (EA)	43
37.	13 September 2021 12:15	Katie Dunmore (EA) to Andy Stocks (Caulmert/FCC)	44
38.	13 September 2021 11:06	Andy Stocks (Caulmert/FCC) to Katie Dunmore (EA)	45-46
39.	22 July 2021 15:21	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	47
40.	22 July 2021 13:15	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	48
41.	21 July 2021 15:15	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	49
42.	21 July 2021 13:02	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	50
43.	21 July 2021 10:15	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	51
44.	13 July 2021 11:41	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	52
45.	13 July 2021 11:26	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	53
46.	9 July 2021 13:17	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	54
47.	6 July 2021 13:43	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	55
48.	6 July 2021 13:41	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	56
49.	6 July 2021 13:28	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	57
50.	22 June 2021 15:48	Katie Dunmore (EA) to Andy Stocks (Caulmert/FCC)	58
51.	22 June 2021 08:48	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	59

52.	21 June 2021 16:45	Katie Dunmore (EA) to Kellie Burston (Caulmert/FCC)	60
53.	21 June 2021 15:46	Kellie Burston (Caulmert/FCC) to Katie Dunmore (EA)	61
54.	21 June 2021 14:31	Katie Dunmore (EA) to Andy Stocks (Caulmert/FCC)	62-63
55.	22 January 2021 08:25	Kellie Burston (Caulmert/FCC) to PSC Land (EA)	64-65

**Sarah Mills**

**From:** Andy Stocks  
**Sent:** 06 February 2023 12:41  
**To:** Burston, Kellie-Marie  
**Subject:** FW: FCC draft decision and consultation EPR/NP3538MF/V009



**Andy Stocks**

**Caulmert Limited**

Director of Environment

AndyStocks

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**From:** Dunmore, Katie <katie.dunmore>  
**Sent:** 21 October 2022 09:26  
**To:** Andy Stocks <AndyStocks>  
**Subject:** FCC draft decision and consultation EPR/NP3538MF/V009

Hi Andy,

The draft decisions for the above application is now on Citizenspace [DN22 8RB, FCC Recycling \(UK\) Limited, EPR/NP3538MF/V009: environmental permit draft decision advertisement - Environment Agency - Citizen Space \(environment-agency.gov.uk\)](#). Its up until the 17<sup>th</sup> November.

After reviewing the decision and given the level of interest it was considered advertising was the most appropriate course of action.

I'll be in touch after the process closes.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
mob: [REDACTED]  
8 katie.dunmore@[REDACTED]

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**Sarah Mills**

**From:** Andy Stocks <[redacted]>  
**Sent:** 06 February 2023 12:41  
**To:** Burston, Kellie-Marie  
**Subject:** FW: FCC Daneshill

**From:** Dunmore, Katie <[redacted]>  
**Sent:** 24 August 2022 14:44  
**To:** Andy Stocks <[redacted]>  
**Subject:** RE: FCC Daneshill

Hi Andy,

We have given this application and the request to reopen the determination detailed consideration and don't consider it appropriate to reassess the application at this stage. The partial refusal for the asbestos activity therefore still stands.


It however has been established that this application should be designated as a site of High Public Interest (HPI). I don't believe there is anything further we need from the operator. We are considering the communications plan. I understand it's just a matter of advertising the decision on Citizen Space.

I'm on leave until the 5<sup>th</sup> of September and will have more details to follow. In the mean time could you let me know if the applicant is happy with the rest of the permit document.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

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mob: [redacted]

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**From:** Andy Stocks <[redacted]>  
**Sent:** 18 July 2022 10:25  
**To:** Dunmore, Katie <[redacted]>  
**Subject:** RE: FCC Daneshill

Thanks Katie

I believe FCC discussed this with Claire Roberts & Julian Ingram in a meeting last week

**Sarah Mills**

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**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

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8 [redacted]

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**To:** Dunmore, Katie <[redacted]>  
**Subject:** RE: FCC Daneshill

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Andy

**From:** Dunmore, Katie <[redacted]>  
**Sent:** 18 July 2022 10:22  
**To:** Andy Stocks <[redacted]>  
**Subject:** RE: FCC Daneshill

Hi Andy,

I've just returned from leave. I'll be in touch once we've had chance to consider this.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
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**From:** Andy Stocks <[redacted]>  
**Sent:** 08 July 2022 15:17  
**To:** Dunmore, Katie <[redacted]>  
**Subject:** RE: FCC Daneshill

Hi Katie,

Following on from response below FCC held the meeting to discuss your draft permit, in particular your refusal to permit asbestos treatment as proposed.

I have been requested to ask whether the EA would be prepared to review this decision in the event that the applicant was remove the 3-way screening of asbestos contaminated waste as part of the process and restrict treatment to handpicking only which would be undertaken within a building.

Regards

Andy



Andy Stocks | Caulmert Limited



Andy

**From:** Dunmore, Katie <[REDACTED]>  
**Sent:** 18 July 2022 10:22  
**To:** Andy Stocks <[REDACTED]>  
**Subject:** RE: FCC Daneshill

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**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

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mob: [REDACTED]

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**From:** Andy Stocks <[REDACTED]>  
**Sent:** 08 July 2022 15:17  
**To:** Dunmore, Katie <[REDACTED]>  
**Subject:** RE: FCC Daneshill

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Regards

Andy



**Sarah Mills**

**From:** Andy Stocks <[redacted]>  
**Sent:** 06 February 2023 12:40  
**To:** Burston, Kellie-Marie  
**Subject:** FW: Daneshill Landfill Site. EPR/NP3538MF/V009

**From:** Dunmore, Katie <[redacted]>  
**Sent:** 05 May 2022 09:33  
**To:** Andy Stocks <[redacted]>  
**Subject:** RE: Daneshill Landfill Site. EPR/NP3538MF/V009

Hi Andy,

Apologies, I've been on leave.

Given we need a wider EA approach to the asbestos screening activity I have referred it to our technical leads. It is in hand, I'll be in touch when a decision is confirmed.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

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mob: [redacted]

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**From:** Andy Stocks <[redacted]>  
**Sent:** 27 April 2022 10:26  
**To:** Dunmore, Katie <[redacted]>  
**Subject:** Daneshill Landfill Site. EPR/NP3538MF/V009

Hi Katie

I was wondering how the determination of this application is progressing as its been a few months since we submitted the Schedule 5 response.

Also, just to let you know that Kellie has left Caulmert to join FCC so please send any further communications to me

Thanks

Andy



Andy Stocks Caulmert Limited

Director of Environment

Mobile: [REDACTED]

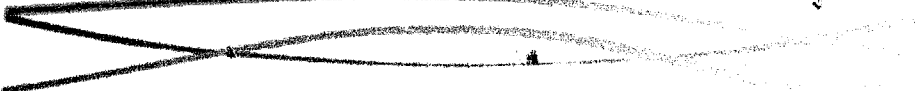
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**Sarah Mills**

---

**From:** Andy Stocks <[redacted]>  
**Sent:** 06 February 2023 12:40  
**To:** Burston, Kellie-Marje  
**Subject:** FW: Daneshill Landfill Site. EPR/NP3538MF/V009

**From:** Dunmore, Katie <[redacted]>  
**Sent:** 05 May 2022 09:33  
**To:** Andy Stocks <[redacted]>  
**Subject:** RE: Daneshill Landfill Site. EPR/NP3538MF/V009

Hi Andy,

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Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

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Hi Katie

I was wondering how the determination of this application is progressing as its been a few months since we submitted the Schedule 5 response.

Also, just to let you know that Kellie has left Caulmert to join FCC so please send any further communications to me

Thanks

Andy



Andy Stocks

Caulmert Limited

Director of Environment

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Pu

**Kellie Burston**

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**From:** Kellie Burston  
**Sent:** 24 February 2022 15:41  
**To:** Dunmore, Katie  
**Subject:** RE: EWC's treated for disposal

**dummymailid:** 0000000170EF9A93500BB4DA7659AA4E6FC8A480700E7E1495B7386CF48AE7040F  
A5A40235F0000000010B0000E7E1495B7386CF48AE7040FA5A40235F0000C182A1  
590000

You're welcome Katie. I have spoken to the Operator who have confirmed that they accept EWC 19 12 11\* being excluded from the permit

Kind Regards  
Kellie

**From:** Dunmore, Katie  
**Sent:** 24 February 2022 08:43  
**To:** Kellie Burston  
**Subject:** RE: EWC's treated for disposal

Thanks Kellie,

I confirm receipt. I'll be in touch with regards to the asbestos activities.

We are unable to include EWC 19 12 11\* into the permit. Its origins are unclear and we consider it may contain more contamination than hydrocarbons.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
mob. [redacted]  
8 [redacted]

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**From:** Kellie Burston [mailto:[redacted]]  
**Sent:** 22 February 2022 16:06  
**To:** Dunmore, Katie  
**Subject:** RE: EWC's treated for disposal

Good afternoon Katie,

**Kellie Burston**

**From:** Kellie Burston  
**Sent:** 24 February 2022 15:41  
**To:** Dunmore, Katie  
**Subject:** RE: EWC's treated for disposal

**dummy mailid:** 00000000170EF9A93500BB4DA7659AA4E6FC8A480700E7E1495B7386CF48AE7040FA5A40235F0000000010B0000E7E1495B7386CF48AE7040FA5A40235F0000C182A1590000

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Kellie

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8 [redacted]

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**From:** Kellie Burston [mailto:[redacted]]  
**Sent:** 22 February 2022 16:06  
**To:** Dunmore, Katie [redacted]  
**Subject:** RE: EWC's treated for disposal

Good afternoon Katie,

## Kellie Burston

---

**From:** Kellie Burston  
**Sent:** 22 February 2022 16:06  
**To:** Dunmore, Katie  
**Subject:** RE: EWC's treated for disposal  
**Attachments:** 3982-CAU-XX-XX-DR-V-1813\_S2-P04.pdf; Daneshill BAT 14.pdf; Appendix B Nicole Doc.pdf

Good afternoon Katie,

I have listed 3 responses below from several email communications and I have detailed our answers in red below each email query. For ease of response, would you be able to collate any future queries into one email so we can ensure that we have included all information/answers in response?

**Sent: 07/01/2022**

Could you clarify what mechanical treatment 19 12 11\* has been subject to and from where the soil is likely to have come from on a metal recycling site?

***These will comprise a small quantity of soils from a metal recycling facility potentially contaminated with hydrocarbons***

**Sent: 12/01/2022**

I've revisited the most recent drainage plan provided and it is still not sufficiently detailed. The information regarding the treatment pads is fine however the channelling and direction of flow for the non-operational areas of the site is not shown. You have previously stated surface waters flow towards the SW lagoon which discharges from the landfills western perimeter. The discharge point from the STF and flow route into the wider site drainage must be included on a drainage plan. The STF has a point source discharge which is channelled into surface water and whilst the water should be clean the system will be subject to checks by the local EA officer. The routes must therefore be labelled on a plan.

I note on drainage plan 3982 ....1808 there is a connection running west to east into the waste treatment system network. Please clarify from where this arises? Is it the wheel wash?

***Please see attached drawing ref: 3982-CAU-XX-XX-DR-V-1813 which provides detail on the channelling and direction of flow for the non-operational areas towards the SW lagoon.***

***The connection running west to east into the treatment system network are waters from the wheel wash which is recirculated for treatment***

**Sent: 25 November 2021 12:23**

Hi Kellie,

Following on from our call the Daneshill STF application has not been fully assessed and we are not satisfied the proposed asbestos storage and picking activity meets BAT. We discussed the requirement for additional information being required for this activity regarding waste segregation and monitoring however at this stage such detail would not add any value to the application as the activity cannot be permitted as described. The comments below relate to asbestos soil storage and picking only given no information has been provided on the asbestos soil screening process.

The application provides limited detail on the measures in place to minimise and contain emissions. Prior to the application being duly made we stressed the importance of the activities operating in line with the Waste Treatment BAT Conclusions 2018 and requested a resubmission in line with this. The BAT assessment submitted with the application (specifically BAT 14) however does not demonstrate that BAT is being applied. It provides a list of dust management and suppression techniques but not a means of capturing or containing hazardous asbestos fibres.

Neither the BAT assessment document nor application as a whole sufficiently recognises the potential risk airborne asbestos fibres may pose or provides measures to capture or contain asbestos fibres. A Schedule 5 notice was



therefore issued and a response to each question received although further information was requested to clarify certain activities.

The concern is that the information provided doesn't provide any further evidence to demonstrate BAT can be achieved (and will be applied) at the Daneshill site. For instance Q.11 requested information on the procedure in place to explain how asbestos soils were deposited into quarantine and storage in a way that minimise dust emissions. We drew attention to our storage guidance which details areas should be marked and signed, bays and locations should be labelled, turnover periods detailed etc.

The response provided some clarification, the soil reception area was highlighted on the plan with maximum stockpile sizes provided. An assurance was provided that soils would be covered until testing was completed although this does appear to be at the end of the working day. This leaves 2 x 2880 tonnes stockpiles and one 3840 tonne stockpile presumably in a heap unprotected by a building or bays.

Q.13 similarly asked for the measures in place to prevent dust and asbestos emissions when loading asbestos waste into the picking line. You confirmed there was a spray rail on the conveyer loading the station but the conveyor was not enclosed. You also confirmed the area is covered by secondary dust suppression. Historic dust monitoring for another site was referenced.

We consider shovelling, lifting, dropping through hoppers, loading through conveyors will agitate the waste and there is a risk that weathered or damaged asbestos pieces may release fibres. The mitigation measures described are akin to those expected for non-hazardous soil operations to manage nuisance dust, we do not consider they meet BAT with regards to containment of asbestos (specifically BAT 14).

The application was clear that waste would then travel through a mobile picking line with a plastic weather shield. Waste would then drop from the outlet conveyor and be formed into further stockpiles.

Q.16 required an explanation of any emissions abatement within the picking booth and if not an explanation how airborne fibres are captured and contained. We further stated:

*Reason - We have significant concerns that the asbestos soil storage, transfer and treatment activities as described do not meet BAT. There appears to be no specific mitigation or abatement proposed with stockpiles described as being deposited, screened and transferred to a picking station with doors and windows, via conveyors and then further deposited in open stockpiles. The Emissions Management Plan states "asbestos fibres are not generated on site above the detection limit so no abatement system is required". We disagree, screening and dropping from height will agitate and may break asbestos materials and lead to release of fibres. Dust suppression and "wetting solution" alone is not considered sufficient mitigation. You must demonstrate through detailed working procedures how asbestos soils are stored, treated and handled to ensure the containment and collection of diffuse emissions. As stated in BAT we would expect techniques such as;*

- Storage and treatment in enclosed buildings and/or equipment
- Maintaining enclosed equipment under adequate pressure
- Collecting and directing emissions to an adequate abatement system

Your response directed us to discussions being held with the Environment Agency regarding activities on another site.

Q.14 requested the operator describe how waste would be transferred to the post treatment storage location. You answered that soil wouldn't pose a risk once validated and that normal dust suppression would be applied. We therefore conclude stockpiles would remain uncovered.

We consider the proposed activities do pose a risk of generating airborne asbestos fibres. Degraded asbestos pieces contained within the soil may pose a risk of realising fibres which will be compounded by handling and treatment. No containment measures are proposed.

No information has been provided regarding the asbestos screening activity which is stated within the application as pre-screening prior to handpicking using a three-way screener. Limited detail is provided on abatement or containment and the operator did not answer the questions within the Schedule 5, instead referencing asbestos monitoring results from Edwin Richards Quarry.

The operator must demonstrate the use of BAT for the application site and that all necessary operational controls will be in place to mitigate and capture emissions. That has not been demonstrated at Daneshill STF and for that reason we are confirming that based on the information provided to date the asbestos storage and treatment activity cannot be permitted. Therefore no further assessment around this issue would be useful at this time.

I've received your request for a meeting with myself and Chris Hall to understand how the asbestos activity can be taken forward. Please take this email as a direction on this. In order to take the asbestos activity forward the operator must reconsider the relevant sections of the Schedule 5 notice highlighted above explaining how BAT will be achieved

for the asbestos activity at this location. We can discuss a suitable timeframe. Alternatively we suggest the operator withdraws the proposals for the asbestos soil treatment activity.

I understand a meeting is to be held between the operator and their account manager Claire Roberts. I have flagged our concerns for this application with Claire and I believe this will be raised at the meeting.

In the mean time I'll await a decision as to whether the operator choses to withdraw or confirm if there is further scope to provide the information requested within a reasonable timeframe.

**Please see attached document ref: Daneshill Bat 14 Response**

Kind Regards  
Kellie

**From:** [Redacted]  
**Sent:** 07 February 2022 16:45  
**To:** Kellie Burston [Redacted]  
**Subject:** RE: EWC's treated for disposal

Thanks Kellie,

Apologies, noted regarding 20 03 03.

With regard to 19 02 05\* this is acceptable although we will refine the code to sludges from the physico/chemical treatment of road sweepings (soil waste only) containing hazardous substances.

Could you clarify what mechanical treatment 19 12 11\* has been subject to and from where the soil is likely to have come from on a metal recycling site?

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

mob: [Redacted]

8 [Redacted]

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**From:** Kellie Burston [mailto:[Redacted]]  
**Sent:** 02 February 2022 11:04  
**To:** Dunmore, Katie [Redacted]  
**Subject:** RE: EWC's treated for disposal

Good Morning Katie,

**Kellie Burston**

**From:** Dunmore, Katie  
**Sent:** 07 February 2022 16:45  
**To:** Kellie Burston  
**Subject:** RE: EWC's treated for disposal

Thanks Kellie,

Apologies, noted regarding 20 03 03.

With regard to 19 02 05\* this is acceptable although we will refine the code to sludges from the physico/chemical treatment of road sweepings (soil waste only) containing hazardous substances.

Could you clarify what mechanical treatment 19 12 11\* has been subject to and from where the soil is likely to have come from on a metal recycling site?

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
mob: [redacted]  
8 [redacted]

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**From:** Kellie Burston [mailto:[redacted]]  
**Sent:** 02 February 2022 11:04  
**To:** Dunmore, Katie [mailto:[redacted]]  
**Subject:** RE: EWC's treated for disposal

Good Morning Katie,

Thank you for your email, I have responded to your queries in turn below:

Following on, could you also clarify how bi remediation of EWC 20 03 03 Street cleaning residues would also render them suitable for use at recovery sites..

Please see attached email correspondence dated 05/11/2021, if you refer to query 4 we have stated "Following a further review of the street cleaning residues (20 03 03) the applicant no longer proposes to accept this material and so this code can be removed from the waste list". I hope this answers your question, however please do not hesitate to discuss if you require further detail.

Could you also respond to the second question on my email. Its noted screening may be necessary post treatment. Please clarify the post treatment (bio remediation) waste codes which may require screening.

**Kellie Burston**

---

**From:** Kellie Burston  
**Sent:** 02 February 2022 11:04  
**To:** Dunmore, Katie  
**Subject:** RE: EWC's treated for disposal  
**Attachments:** Daneshill STF - email queries response

Good Morning Katie,

Thank you for your email, I have responded to your queries in turn below:

Following on, could you also clarify how bi remediation of EWC 20 03 03 Street cleaning residues would also render them suitable for use at recovery sites..  
Please see attached email correspondence dated 05/11/2021, if you refer to query 4 we have stated *"Following a further review of the street cleaning residues (20 03 03) the applicant no longer proposes to accept this material and so this code can be removed from the waste list"*. I hope this answers your question, however please do not hesitate to discuss if you require further detail.

Could you also respond to the second question on my email . Its noted screening may be necessary post treatment. Please clarify the post treatment (bio remediation) waste codes which may require screening.

Asbestos wastes:

17 05 03\* soil and stones containing hazardous substances (contains identifiable pieces of bonded asbestos (any particle of size that can be identified as potentially being asbestos by a competent person if examined by the naked eye))

17 06 05\* construction materials containing asbestos (discrete pieces of bonded asbestos within the soil matrix only

19 13 02 – Solid wastes from soil remediation other than those mentioned in 19 13 01  
(please note that this waste code is accepted to Daneshill landfill for restoration permit and not brought directly to the STF for treatment. Treated soils that have met the criteria will leave the STF and be placed into the Daneshill landfill for restoration as 19 13 02)

I hope this answers your queries.

Kind Regards  
Kellie

**From:** Dunmore, Katie <[redacted]>  
**Sent:** 31 January 2022 10:09  
**To:** Kellie Burston <[redacted]>  
**Subject:** RE: EWC's treated for disposal

Hi Kellie,

Following on, could you also clarify how bi remediation of EWC 20 03 03 Street cleaning residues would also render them suitable for use at recovery sites..

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

**Kellie Burston**

---

**From:** Dunmore, Katie [REDACTED]  
**Sent:** 31 January 2022 10:09  
**To:** Kellie Burston  
**Subject:** RE: EWC's treated for disposal

Hi Kellie,

Following on, could you also clarify how bi remediation of EWC 20 03 03 Street cleaning residues would also render them suitable for use at recovery sites..

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
mob: [REDACTED]  
8 [REDACTED]

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**From:** Dunmore, Katie  
**Sent:** 31 January 2022 09:27  
**To:** Kellie Burston [REDACTED]  
**Subject:** RE: EWC's treated for disposal

Hi Kellie,

Thanks for the further information. We'll consider this and confirm shortly..

Could you also respond to the second question on my email . Its noted screening may be necessary post treatment. Please clarify the post treatment (bio remediation) waste codes which may require screening.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
mob: [REDACTED]  
8 [REDACTED]

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**Kellie Burston**

**From:** Dunmore, Katie  
**Sent:** 31 January 2022 09:27  
**To:** Kellie Burston  
**Subject:** RE: EWC's treated for disposal

Hi Kellie,

Thanks for the further information. We'll consider this and confirm shortly..

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Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
mob: [redacted]  
8 [redacted]

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**From:** Kellie Burston [mailto:[redacted]]  
**Sent:** 20 January 2022 11:14  
**To:** Dunmore, Katie [redacted]  
**Subject:** RE: EWC's treated for disposal

Good Morning Katie,

I have spoken to the operator who have confirmed that codes 19 02 04\* and 19 02 11\* can be removed

19 02 05\*

The Operator has advised that this codes will be accepted into the facility as soil from road sweepings that is contaminated with hydrocarbons. The road sweepings will be processed prior to coming to the soil treatment facility to remove the litter etc, and particularly leaf litter during the autumn as this is a long term source of ammonia that would not be suitable for restoration use. It is only in small quantities and mainly comprises of the 63µm fraction from the soil washing process so does not affect the output of the soil treatment process and suitability for restoration use. The restoration areas that receive treated soils will be subject to a quantitative risk assessment to ensure risks to identified receptors are identified and appropriate reuse criteria are specified, this includes the protection of controlled waters at the site. This sentence needs clearing with FCC as it will lead to more questions and may impact Restoration Plan

19 12 11\*

**Kellie Burston**

**From:** Dunmore, Katie  
**Sent:** 31 January 2022 09:27  
**To:** Kellie Burston  
**Subject:** RE: EWC's treated for disposal

Hi Kellie,

Thanks for the further information. We'll consider this and confirm shortly..

Could you also respond to the second question on my email . Its noted screening may be necessary post treatment. Please clarify the post treatment (bio remediation) waste codes which may require screening.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

mob: 07779 999999

8 [Redacted]

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**From:** Kellie Burston [mailto:Kellie.Burston@ceh.com]  
**Sent:** 20 January 2022 11:14  
**To:** Dunmore, Katie  
**Subject:** RE: EWC's treated for disposal

Good Morning Katie,

I have spoken to the operator who have confirmed that codes 19 02 04\* and 19 02 11\* can be removed

19 02 05\*

The Operator has advised that this codes will be accepted into the facility as soil from road sweepings that is contaminated with hydrocarbons. The road sweepings will be processed prior to coming to the soil treatment facility to remove the litter etc, and particularly leaf litter during the autumn as this is a long term source of ammonia that would not be suitable for restoration use. It is only in small quantities and mainly comprises of the 63µm fraction from the soil washing process so does not affect the output of the soil treatment process and suitability for restoration use. The restoration areas that receive treated soils will be subject to a quantitative risk assessment to ensure risks to identified receptors are identified and appropriate reuse criteria are specified, this includes the protection of controlled waters at the site. This sentence needs clearing with FCC as it will lead to more questions and may impact Restoration Plan

19 12 11\*

**Kellie Burston**

**From:** Dunmore, Katie  
**Sent:** 07 January 2022 16:22  
**To:** Kellie Burston  
**Subject:** RE: EWC's treated for disposal

Thanks Kellie,

There are however a number of wastes detailed as being accepted for bio treatment that are not usually considered suitable for recovery:

19 02 04*	premixed wastes composed of at least one hazardous waste
19 02 05*	sludges from physico/chemical treatment containing hazardous substances
19 02 11*	other wastes containing hazardous substances
19 12 11*	Other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances

Please clarify how these could be considered suitable for recovery at the landfill.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
mob: [redacted]  
8 [redacted]

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**From:** Kellie Burston [mailto:[redacted]]  
**Sent:** 07 January 2022 15:47  
**To:** Dunmore, Katie [redacted]  
**Subject:** RE: EWC's treated for disposal

Hi Katie,

Thank you for your email- the primary activity at site is recovery not disposal, wastes will be treated for recovery. Only wastes which do not meet the re-use criteria for restoration post treatment will be sent onwards to either a suitable facility or for disposal.

I hope this answers your query

Kind Regards



Please clarify how these could be considered suitable for recovery at the landfill.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

mob: [REDACTED]

8 [REDACTED]

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**From:** Kellie Burston [mailto:[REDACTED]]  
**Sent:** 07 January 2022 15:47  
**To:** Dunmore, Katie <[REDACTED]>  
**Subject:** RE: EWC's treated for disposal

Hi Katie,

Thank you for your email, the primary activity at site is recovery not disposal, wastes will be treated for recovery. Only wastes which do not meet the re-use criteria for restoration post treatment will be sent onwards to either a suitable facility or for disposal.

I hope this answers your query

Kind Regards  
Kellie



<b>Kellie Burston</b>	<b>Caulmert Limited</b>
Senior Environmental Consultant	Mobile: [REDACTED]
Kellie [REDACTED]	Direct: [REDACTED]
<a href="http://www.caulmert.com">www.caulmert.com</a>	Phone: [REDACTED]
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**Kellie Burston**

---

**From:** Dunmore, Katie  
**Sent:** 07 January 2022 14:50  
**To:** Kellie Burston  
**Subject:** EWC's treated for disposal

Hi Kellie,

Following on from our call please confirm which wastes will be treated for disposal (with respect to bioremediation) and the proposed disposal route for these treated wastes.

Reason – The application details waste will be treated for both recovery and disposal. Only the potential recovery option of using the treated waste for restoration of the landfill is discussed further. As detailed within our SGN 5.06 Guidance we need to ensure there is an appropriate disposal route for the waste. We will also need to specify which wastes can be treated for recovery and disposal in the permit.

In addition, please confirm the EWC codes for the wastes subject to screening following bioremediation.

Reason – You have confirmed non-hazardous wastes will be subject to screening following bioremediation prior to reuse. The EWC table provided for physical treatment however contains a list of hazardous and non-hazardous wastes which appears to be inputs prior to bio treatment.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

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**Kellie Burston**

**From:** Kellie Burston  
**Sent:** 10 December 2021 10:41  
**To:** Dunmore, Katie  
**Subject:** RE: Asbestos soil treatment activities proposed at Daneshill Landfill Site. EPR/NP3538MF/V009

Good Morning Katie,

A quick update, further to FCC's meeting with Claire Roberts and discussions held between them, we are preparing a response offering additional containment and control measures to achieve BAT 14.

Kind Regards  
Kellie

**From:** Kellie Burston [redacted]  
**Sent:** 09 December 2021 15:53  
**To:** Dunmore, Katie [redacted]  
**Subject:** FW: Asbestos soil treatment activities proposed at Daneshill Landfill Site. EPR/NP3538MF/V009

Hi Katie,

Thank you for your email – we are preparing a response and will be with you shortly.

Kind Regards  
Kellie



Kellie Burston

Caulmert Limited

Senior Environmental Consultant

Mobile: [redacted]

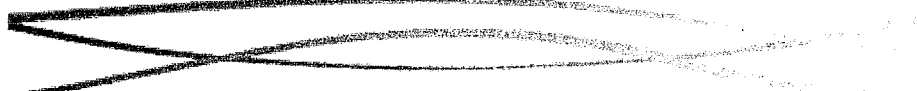
Kellie Burston [redacted]

Direct: [redacted]

[www.caulmert.com](http://www.caulmert.com)

Phone: [redacted]

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**Kellie Burston**

**From:** Kellie Burston  
**Sent:** 09 December 2021 15:53  
**To:** Dunmore, Katie  
**Subject:** FW: Asbestos soil treatment activities proposed at Daneshill Landfill Site. EPR/NP3538MF/V009

Hi Katie,

Thank you for your email – we are preparing a response and will be with you shortly.

Kind Regards  
Kellie



<b>Kellie Burston</b>	<b>Caulmert Limited</b>
Senior Environmental Consultant	Mobile: [REDACTED]
[REDACTED]	Direct: [REDACTED]
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**From:** Dunmore, Katie <[REDACTED]>  
**Sent:** 25 November 2021 12:23  
**To:** Kellie Burston <[REDACTED]>  
**Subject:** Asbestos soil treatment activities proposed at Daneshill Landfill Site. EPR/NP3538MF/V009

Hi Kellie,

Following on from our call the Daneshill STF application has not been fully assessed and we are not satisfied the proposed asbestos storage and picking activity meets BAT. We discussed the requirement for additional information being required for this activity regarding waste segregation and monitoring however at this stage such detail would not add any value to the application as the activity cannot be permitted as described. The comments below relate to

**Kellie Burston**

---

**From:** Dunmore, Katie <[redacted]>  
**Sent:** 25 November 2021 12:23  
**To:** Kellie Burston  
**Subject:** Asbestos soil treatment activities proposed at Daneshill Landfill Site. EPR/NP3538MF/V009

Hi Kellie,

Following on from our call the Daneshill STF application has not been fully assessed and we are not satisfied the proposed asbestos storage and picking activity meets BAT. We discussed the requirement for additional information being required for this activity regarding waste segregation and monitoring however at this stage such detail would not add any value to the application as the activity cannot be permitted as described. The comments below relate to asbestos soil storage and picking only given no information has been provided on the asbestos soil screening process.

The application provides limited detail on the measures in place to minimise and contain emissions. Prior to the application being duly made we stressed the importance of the activities operating in line with the Waste Treatment BAT Conclusions 2018 and requested a resubmission in line with this. The BAT assessment submitted with the application (specifically BAT 14) however does not demonstrate that BAT is being applied. It provides a list of dust management and suppression techniques but not a means of capturing or containing hazardous asbestos fibres.

Neither the BAT assessment document nor application as a whole sufficiently recognises the potential risk airborne asbestos fibres may pose or provides measures to capture or contain asbestos fibres. A Schedule 5 notice was therefore issued and a response to each question received although further information was requested to clarify certain activities.

The concern is that the information provided doesn't provide any further evidence to demonstrate BAT can be achieved (and will be applied) at the Daneshill site. For instance Q.11 requested information on the procedure in place to explain how asbestos soils were deposited into quarantine and storage in a way that minimise dust emissions. We drew attention to our storage guidance which details areas should be marked and signed, bays and locations should be labelled, turnover periods detailed etc.

The response provided some clarification, the soil reception area was highlighted on the plan with maximum stockpile sizes provided. An assurance was provided that soils would be covered until testing was completed although this does appear to be at the end of the working day. This leaves 2 x 2880 tonnes stockpiles and one 3840 tonne stockpile presumably in a heap unprotected by a building or bays.

Q.13 similarly asked for the measures in place to prevent dust and asbestos emissions when loading asbestos waste into the picking line. You confirmed there was a spray rail on the conveyer loading the station but the conveyor was not enclosed. You also confirmed the area is covered by secondary dust suppression. Historic dust monitoring for another site was referenced.

We consider shovelling, lifting, dropping through hoppers, loading through conveyors will agitate the waste and there is a risk that weathered or damaged asbestos pieces may release fibres. The mitigation measures described are akin to those expected for non-hazardous soil operations to manage nuisance dust, we do not consider they meet BAT with regards to containment of asbestos (specifically BAT 14).

The application was clear that waste would then travel through a mobile picking line with a plastic weather shield. Waste would then drop from the outlet conveyor and be formed into further stockpiles.

Q.16 required an explanation of any emissions abatement within the picking booth and if not an explanation how airborne fibres are captured and contained. We further stated:

*Reason - We have significant concerns that the asbestos soil storage, transfer and treatment activities as described do not meet BAT. There appears to be no specific mitigation or abatement proposed with stockpiles described as being deposited, screened and transferred to a picking station with doors and windows, via conveyors and then further deposited in open stockpiles. The Emissions Management Plan states "asbestos fibres are not generated on site above the detection limit so no abatement system is required". We disagree, screening and dropping from height will agitate and may break asbestos materials and lead to release of fibres. Dust suppression and "wetting solution" alone is not considered sufficient mitigation. You must demonstrate through detailed*

*working procedures how asbestos soils are stored, treated and handled to ensure the containment and collection of diffuse emissions. As stated in BAT we would expect techniques such as;*

- *Storage and treatment in enclosed buildings and/or equipment*
- *Maintaining enclosed equipment under adequate pressure*
- *Collecting and directing emissions to an adequate abatement system*

Your response directed us to discussions being held with the Environment Agency regarding activities on another site.

Q.14 requested the operator describe how waste would be transferred to the post treatment storage location. You answered that soil wouldn't pose a risk once validated and that normal dust suppression would be applied. We therefore conclude stockpiles would remain uncovered.

We consider the proposed activities do pose a risk of generating airborne asbestos fibres. Degraded asbestos pieces contained within the soil may pose a risk of realising fibres which will be compounded by handling and treatment. No containment measures are proposed.

No information has been provided regarding the asbestos screening activity which is stated within the application as pre-screening prior to handpicking using a three-way screener. Limited detail is provided on abatement or containment and the operator did not answer the questions within the Schedule 5, instead referencing asbestos monitoring results from Edwin Richards Quarry.

The operator must demonstrate the use of BAT for the application site and that all necessary operational controls will be in place to mitigate and capture emissions. That has not been demonstrated at Daneshill STF and for that reason we are confirming that based on the information provided to date the asbestos storage and treatment activity cannot be permitted. Therefore no further assessment around this issue would be useful at this time.

I've received your request for a meeting with myself and Chris Hall to understand how the asbestos activity can be taken forward. Please take this email as a direction on this. In order to take the asbestos activity forward the operator must reconsider the relevant sections of the Schedule 5 notice highlighted above explaining how BAT will be achieved for the asbestos activity at this location. We can discuss a suitable timeframe. Alternatively we suggest the operator withdraws the proposals for the asbestos soil treatment activity.

I understand a meeting is to be held between the operator and their account manager Claire Roberts. I have flagged our concerns for this application with Claire and I believe this will be raised at the meeting.

In the mean time I'll await a decision as to whether the operator choses to withdraw or confirm if there is further scope to provide the information requested within a reasonable timeframe.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

☎ (intern. mob. [redacted])

✉ [katie.dunmore@environment-agency.gov.uk](mailto:katie.dunmore@environment-agency.gov.uk)

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**Kellie Burston**

**From:** Kellie Burston  
**Sent:** 23 November 2021 17:56  
**To:** Dunmore, Katie  
**Subject:** RE: 19 05 03 as a filter medium

Good evening Katie,

Thank you for your time today, in response to below: Edwin Richards Quarry, Maw Green Landfill Site and Welbeck Landfill Site currently use 19 05 03 as a filter medium.

From our phone call conversation, we have spoken to the Operator who have asked if we can request a meeting with yourself to discuss the concerns and agree a way forward, in addition we would like to request Chris Hall's attendance. Let me know a suitable time for yourselves.

I look forward to hearing back from you  
Kind Regards  
Kellie



**Kellie Burston** **Caulmert Limited**

Senior Environmental Consultant

Mobile: [REDACTED]

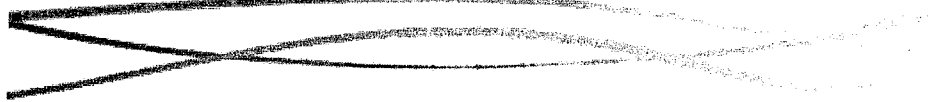
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**From:** Dunmore, Katie <[REDACTED]>  
**Sent:** 18 November 2021 12:53  
**To:** Kellie Burston <[REDACTED]>  
**Subject:** 19 05 03 as a filter medium

Hi Kellie,

**Kellie Burston**

---

**From:** [Redacted]  
**Sent:** 18 November 2021 12:53  
**To:** Kellie Burston  
**Subject:** 19 05 03 as a filter medium

Hi Kellie,

Thanks for yesterday's RFI response. Could you let me know what FCC sites are currently using 19 05 03 as a filter medium.

Many thanks

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

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**Kellie Burston**

---

**From:** Kellie Burston  
**Sent:** 17 November 2021 14:39  
**To:** Dunmore, Katie  
**Subject:** RE: Daneshill STF - email queries response

Afternoon Katie,

Thank you for your email – please see below our response, do not hesitate to give me a call/drop me an email should you require any further detail

*Thanks for the additional information. Could you clarify the finer detail for the off-site transport of the picked asbestos pieces. You state the contents in transported to Winterton Landfill please clarify how. Is the entire skip taken or the contents moved? in what vehicles? provide details of control measures etc.*

*The sealed and appropriately labelled asbestos skip will be picked up by a registered skip vehicle (or similar) and then delivered to the Winterton Landfill site (or other suitable permitted disposal sites) for asbestos disposal. All asbestos waste movements/handling will be managed in accordance with the duty of care requirements and provided with a Hazardous Waste Consignment Note, to ensure the safe management of waste to protect human health and the environment. All relevant documents (e.g. consignee returns/records of rejected loads) and copies will be kept for 3 years.*

*With regards to the use of EWC 19 05 03 as biofilter medium. You described this as oversize compost however the material coded under EWC 19 05 03 can be highly variable and odorous. It may also contain a lot of plastic and contrary material which could affect its efficacy as a filter medium.*

*BAT is to install a biofilter however for the reasons above I don't believe the use of waste material constitutes BAT. Why have the usual non-waste materials not been chosen for the biofilter? Has the Air Quality Impact Assessment been specifically modelled using EWC 19 05 03 as a filter medium?*

*The biofilter medium (of EWC 19 05 03) will be brought over from an FCC's composting facility where it is produced. The biofilter medium will be specifically produced as a biofilter and put through a trommel to remove any non-compostable inclusions such as litter and plastic and then brought to Daneshill STF. At Daneshill Landfill, the oversize compost is hydrated and a small amount of ammonium nitrate is added to increase the available nitrogen to approximately 100mg/kg to ensure that the medium is supportive of microbial proliferation once there are effluent gases passing through the biofilter; it is then sampled to ensure that the critical operational parameters are within the optimal range and covered with a tarpaulin to retain its moisture content and reduce the potential for any particulate and odour emissions.*

*It is considered that the use of EWC 19 05 03 as a biofilter medium shows beneficial advantages when compared to the purchase of PAS compost, which has been found to result in back-pressure due to the fine material content. Previous experience by the Operator on smaller mobile and containerised operations do not provide the capacity that is required at Daneshill Soil Treatment Facility. The use and design of EWC 19 05 03 as a biofilter medium has been modelled in the Air Quality Impact Assessment based on monitoring data from another site using the same design and the Operator will ensure that all monitoring is undertaken and control measures are in place to confirm that the biofilter is maintained within its optimal range (e.g. moisture content, pH, available nitrogen, particle size etc) and the release of fugitive emissions is minimised. The use of EWC 19 05 03 as a biofilter medium is already carried out by the Operator at similar sites, where proven monitoring results has shown the use of EWC 19 05 03 to be effective with negligible fugitive emissions.*

Kind Regards  
Kellie

**From:** Dunmore, Katie  
**Sent:** 08 November 2021 11:04

**Kellie Burston**

---

**From:** Dunmore, Katie  
**Sent:** 08 November 2021 11:04  
**To:** Kellie Burston  
**Cc:** James Cook; Andy Stocks; Jon Owens  
**Subject:** RE: Daneshill STF - email queries response

Hi Kellie,

Thanks for the additional information. Could you clarify the finer detail for the off-site transport of the picked asbestos pieces. You state the contents in transported to Winterton Landfill please clarify how. Is the entire skip taken or the contents moved? in what vehicles? provide details of control measures etc.

With regards to the use of EWC 19 05 03 as biofilter medium. You described this as oversize compost however the material coded under EWC 19 05 03 can be highly variable and odorous. It may also contain a lot of plastic and contrary material which could affect its efficacy as a filter medium.

BAT is to install a biofilter however for the reasons above I don't believe the use of waste material constitutes BAT. Why have the usual non-waste materials not been chosen for the biofilter? Has the Air Quality Impact Assessment been specifically modelled using EWC 19 05 03 as a filter medium?

I'll need to take advice from my biowaste lead with regards to the biofilter as I've not seen waste materials described before. I therefore may have additional questions. In the meantime however please respond to the above.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
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**From:** Kellie Burston [mailto: ]  
**Sent:** 05 November 2021 08:53  
**To:** Dunmore, Katie  
**Cc:** James Cook < >; Andy Stocks < >; Jon Owens < >  
**Subject:** Daneshill STF - email queries response

Good Morning Katie,

Please see below our response to your email queries regarding Daneshill Soil Treatment Facility. I have also attached a revised Site Layout Plan, drawing reference; 3982-CAU-XX-XX-DR-V-1807\_S2-P04 and an updated Odour

**Kellie Burston**

---

**From:** Kellie Burston  
**Sent:** 05 November 2021 08:53  
**To:** Dunmore, Katie  
**Cc:** James Cook; Andy Stocks; Jon Owens  
**Subject:** Daneshill STF - email queries response  
**Attachments:** 3982-CAU-XX-XX-DR-V-1807\_S2-P04.pdf; 3982-CAU-XX-XX-RP-V-0308.A0.C3 OMP (Final issue).pdf

Good Morning Katie,

Please see below our response to your email queries regarding Daneshill Soil Treatment Facility. I have also attached a revised Site Layout Plan, drawing reference; 3982-CAU-XX-XX-DR-V-1807\_S2-P04 and an updated Odour Management Plan, document ref; 3982-CAU-XX-XX-RP-V-0308.A0.C3. I have also provided a document link below for the Odour Management Plan:  
<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:a4afb6fa-676a-4985-8836-b3c9ad7c476f>

Q2. What are the surface drainage arrangements for the non-operational areas of the site? Where is the surface water channelled?

*The Surface Water Management Plan for the site indicates that surface water arising from this area of the site flows towards the "SW lagoon" located close to the site entrance which then discharges to the ditch on the western perimeter of the landfill which is monitored under the permit at SW04 and is an authorized discharge point from the site.*

Q15. How does the bagged asbestos get into the skip? For instance are chutes used or do operatives carry the pieces and place in by hand? Where is the skip? The plan indicates the location of the picking station, is it below?

*The skip is located next to the picking station and is kept locked. The double bagged ACM debris is manually taken out of the picking station and placed in the lockable skip. The Site Layout Plan has been amended – please see attached.*

Q22. Please clarify the new treatment pad layout plan 3982 which shows an asbestos control zone, screener and picking booth across all 3 pads. I understood pad 3 coloured purple was to be used solely for asbestos treatment with 1 and 2 for bioremediation. I note the response to Q22 confirms there will be no screening of hydrocarbon contaminated soils. Please clarify if asbestos works are to be carried out across all three pads.

*bioremediation. I note the response to Q22 confirms there will be no screening of hydrocarbon contaminated soils. Please clarify if asbestos works are to be carried out across all three pads.*

*Please see updated Site Layout Plan. No screening of hydrocarbon contaminated soils will take place as this is not needed prior to treatment. At the end of biotreatment when the soils are non-hazardous and meet the reuse criteria for the restoration/landfill area they may be screened using a separate two-way screen to ensure that the physical nature of soil is suitable for its final use.*

*Flexibility will be required across the process to accommodate local market demands which may include the use of different pads for asbestos treatment, albeit the most likely scenario is that the treatment facility is built in phases.*

*The rationale behind the design is that areas that are linked to the biopile treatment equipment (Pads 1 and 2) would be used for biotreatment and where there is spare unused space could also be used for asbestos picking (within the picking unit) and screening using the existing segregation approach for supervised soil reception to prevent any mixing of waste soils. Pad 3 will be used for asbestos picking and screening, however, this pad is unlikely to be developed immediately following permit issue and will be subject to market demands. The ratio of soils with hydrocarbon contamination and asbestos contamination is very variable and so it is impossible to state exactly what treatment will be applied on Pads 1 and 2 at any one time in the future other than through general principles highlighted in the drawings. The proposed soil reception approach has been used on other sites, with robust, proven waste acceptance procedures implemented to ensure there is no mixing of different soil types. All drivers are given strict instructions, and clear signage coupled with supervision of the unloading of all loads by a trained operative. Once reception/soil verification testing has confirmed the suitability of the soils to be accepted at site, the soils are placed into separate soil treatment batches for biotreatment or asbestos treatment.*

Following on from my previous email could you also clarify point 24 on the Schedule 5 response. Its noted 30m3 of wood will be stored. The location however is not included on the plan. The location of the ammonium nitrate it noted. You haven't mentioned



**Kellie Burston**

---

**From:** Dunmore, Katie <katie. [REDACTED]>  
**Sent:** 22 October 2021 14:54  
**To:** Kellie Burston  
**Cc:** Andy Stocks  
**Subject:** Daneshill biofilter construction CLO or waste wood?

Hi Kellie,

Apologies for the separate email again but I've noticed an inconsistency in the application documents and clarification is required.

Again regarding your Schedule 5 response to question 24. You state the biofilter will be formed of off spec compost 19 05 03. The OMP however states the biofilter will be woodchip. It's not clear if this is waste woodchip. Please clarify this with your response to my earlier query regarding waste materials and their use.

I'm on leave next week. Please respond w/b 1<sup>st</sup> November.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

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**Kellie Burston**

---

**From:** Dunmore, Katie <[redacted]>  
**Sent:** 21 October 2021 13:55  
**To:** Kellie Burston  
**Subject:** Final destination for picked asbestos at Daneshill

Hi Kellie,

I have a further query regarding asbestos activities at Daneshill.

I note there is not a stable, non-reactive cell at Daneshill. Where will the asbestos fragments picked from soils be disposed of? If transported offsite please provide details of the measures in place to prevent emissions including how waste will be transported – for example will the entire skip and its contents be removed from site?

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

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**Kellie Burston**

**From:** Kellie Burston  
**Sent:** 18 October 2021 08:20  
**To:** Dunmore, Katie  
**Subject:** RE: Further clarification required Daneshill STF

Good Morning Katie,

Thank you for your emails- I am confirming a response with the Operator.

Kind Regards  
Kellie



<b>Kellie Burston</b>	<b>Caulmert Limited</b>
Senior Environmental Consultant	Mobile: [REDACTED]
[REDACTED]	Direct: [REDACTED]
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**From:** Dunmore, Katie <[REDACTED]>  
**Sent:** 13 October 2021 18:49  
**To:** Kellie Burston <[REDACTED]>  
**Subject:** Further clarification required Daneshill STF

Hi Kellie,

Following on from my previous email could you also clarify point 24 on the Schedule 5 response. Its noted 30m3 of wood will be stored. The location however is not included on the plan. The location of the ammonium nitrate it noted. You haven't mentioned off-spec compost - 19 05 03 or street cleaning residues - 20 03 03 accepted as a separate waste stream, are these no longer proposed for inclusion into the bioremediation process?

Kind regards

**Katie Dunmore**

**Kellie Burston**

---

**From:** Dunmore, Katie <[redacted]>  
**Sent:** 13 October 2021 18:49  
**To:** Kellie Burston  
**Subject:** Further clarification required Daneshill STF

Hi Kellie,

Following on from my previous email could you also clarify point 24 on the Schedule 5 response. Its noted 30m3 of wood will be stored. The location however is not included on the plan. The location of the ammonium nitrate it noted. You haven't mentioned off-spec compost - 19 05 03 or street cleaning residues - 20 03 03 accepted as a separate waste stream, are these no longer proposed for inclusion into the bioremediation process?

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

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**Kellie Burston**

---

**From:** Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>  
**Sent:** 13 October 2021 10:06  
**To:** Kellie Burston  
**Subject:** Clarification of Schedule 5 document

Hi Kellie,

I'm just going through the Schedule 5 response, a few of the questions require additional clarification.

Q2. What are the surface drainage arrangements for the non-operational areas of the site? Where is the surface water channelled?

Q15. How does the bagged asbestos get into the skip? For instance are chutes used or do operatives carry the pieces and place in by hand? Where is the skip? The plan indicates the location of the picking station, is it below?

Q22. Please clarify the new treatment pad layout plan 3982 which shows an asbestos control zone, screener and picking booth across all 3 pads. I understood pad 3 coloured purple was to be used solely for asbestos treatment with 1 and 2 for bioremediation. I note the response to Q22 confirms there will be no screening of hydrocarbon contaminated soils. Please clarify if asbestos works are to be carried out across all three pads.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
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**Kellie Burston**

---

**From:** Dunmore, Katie <[redacted]>  
**Sent:** 06 October 2021 10:08  
**To:** Kellie Burston  
**Subject:** RE: EPR/NP3538MF/V009 Daneshill Soils Treatment Facility Schedule 5

Thanks Kellie,

I acknowledge receipt.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

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**From:** Kellie Burston [mailto:[redacted]]  
**Sent:** 01 October 2021 17:40  
**To:** [redacted]  
**Cc:** James Cook <[redacted]>; Andy Stocks <[redacted]>; Jon Owens <[redacted]>  
**Subject:** EPR/NP3538MF/V009 Daneshill Soils Treatment Facility Schedule 5

Good Evening Katie,

Please see below the document links for the Schedule 5 response for the Daneshill Soils Treatment Facility, relevant drawings and appendices are also included within each of the document links.

Daneshill Response Letter, document ref: 3982-CAU-XX-XX-CO-V-9001-A0.C1  
<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:356bee00-6c21-4068-8260-26bd0402e950>

Emissions Management Plan, document ref: 3982-CAU-XX-XX-RP-V-0307.A0.C2  
<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:0822ab69-d884-4bcc-9477-530270b2bb5f>

Odour Management Plan, document ref: 3982-CAU-XX-XX-RP-V-0308.A0.C2  
<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:d44cedfc-fa8f-456f-9812-b22b963d93e4>

Should you have any questions or queries, please do not hesitate to get in touch with myself or Andy Stocks

**Kellie Burston**

**From:** Kellie Burston  
**Sent:** 04 October 2021 13:59  
**To:** Dunmore, Katie  
**Subject:** Re: EPR/NP3538MF/V009 Daneshill Soils Treatment Facility Schedule 5  
**Attachments:** 3982-CAU-XX-XX-DR-V-1807\_S2-P03.pdf; 3982-CAU-XX-XX-DR-V-1808\_S2-P01.pdf

Good afternoon Katie,

Please see attached most recent versions of drawings:

Site Layout Plan, drawing ref: 3982-XX-XX-DR-V1-1807  
Surface and Foul Water Connections, drawing ref: 3982-XX-XX-DR-V-1808

Any queries, please do not hesitate to get in touch,

Kind Regards  
Kellie



<b>Kellie Burston</b>	<b>Caulmert Limited</b>
Senior Environmental Consultant	Mobile: [REDACTED]
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On 1 Oct 2021, at 17:40, Kellie Burston <[REDACTED]> wrote:

Good Evening Katie,

**Kellie Burston**

**From:** Kellie Burston  
**Sent:** 01 October 2021 17:40  
**To:** Dunmore, Katie  
**Cc:** James Cook; Andy Stocks; Jon Owens  
**Subject:** EPR/NP3538MF/V009 Daneshill Soils Treatment Facility Schedule 5

Good Evening Katie,

Please see below the document links for the Schedule 5 response for the Daneshill Soils Treatment Facility, relevant drawings and appendices are also included within each of the document links.

Daneshill Response Letter, document ref: 3982-CAU-XX-XX-CO-V-9001-A0.C1  
<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:356bee00-6c21-4068-8260-26bd0402e950>

Emissions Management Plan, document ref: 3982-CAU-XX-XX-RP-V-0307.A0.C2  
<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:0822ab69-d884-4bcc-9477-530270b2bb5f>

Odour Management Plan, document ref: 3982-CAU-XX-XX-RP-V-0308.A0.C2 <https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:d44cedfc-fa8f-456f-9812-b22b963d93e4>

Should you have any questions or queries, please do not hesitate to get in touch with myself or Andy Stocks

Kind Regards  
Kellie



**Kellie Burston** **Caulmert Limited**  
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**Sarah Mills**

---

**From:** Andy Stocks <[redacted]>  
**Sent:** 06 February 2023 12:39  
**To:** Burston, Kellie-Marie  
**Subject:** FW: Daneshill Permit Application - EPR/NP3538MF/V009

**From:** Dunmore, Katie <[redacted]>  
**Sent:** 30 September 2021 17:27  
**To:** Andy Stocks <[redacted]>  
**Subject:** RE: Daneshill Permit Application - EPR/NP3538MF/V009

Hi Andy,

My mobiles out of action at the moment, awaiting a new charger. My internet number is working.

Noted on the S5. It will take me a while to consider the responses and so I'm happy to hold fire on the screener for the moment.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

[redacted]  
8 [redacted]

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**From:** Andy Stocks [mailto:[redacted]]  
**Sent:** 30 September 2021 17:18  
**To:** Dunmore, Katie <[redacted]>  
**Subject:** RE: Daneshill Permit Application - EPR/NP3538MF/V009

Hi Katie

I've tried calling a couple of times and have left messages but just to confirm and update you. We are looking to submit the responses to the schedule 5 Notice tomorrow with the exception of the questions relating to the screening operation. It's taken a little longer than I expected as we have been waiting for info from the Operator.

With respect to abatement on the screening operation, I understand that a meeting was held on Wednesday last week, in which FCC and their contractors Provectus proposed a containment solution for the screening operation. I

**Sarah Mills**

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**Permitting Officer**  
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✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
[redacted]  
[redacted] gov.uk

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understand this has been formally submitted and they are waiting on a confirmation from the EA as to whether it is acceptable. If acceptable this will also be proposed for Daneshill.

Therefore as discussed previously we would ask for additional time to respond to the questions relating to the screening to able us to wait for the decision.

Regards

Andy

**From:** Dunmore, Katie <katie.dunmore@environment.gov.uk>  
**Sent:** 13 September 2021 12:15  
**To:** Andy Stocks <andy.stocks@environment.gov.uk>  
**Subject:** RE: Daneshill Permit Application - EPR/NP3538MF/V009

Hi Andy,

Many thanks for the email. A video won't be necessary. I'm familiar with the technologies proposed.

What we need is written proposals that explain the procedures and working methods on site. These may then be tied into the permit as operating techniques and will form part of our decision.

As we discussed last week I've broken down the Schedule 5 to the fine detail because this is necessary for the determination. The operator has to spell it out how they handle the soils to prevent agitation and fibre release.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

01256 234700  
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**From:** Andy Stocks [mailto:andy.stocks@environment.gov.uk]  
**Sent:** 13 September 2021 11:06  
**To:** Dunmore, Katie <katie.dunmore@environment.gov.uk>  
**Subject:** Daneshill Permit Application - EPR/NP3538MF/V009

Hi Katie,

Further to our telephone conversation last week, I can confirm that we are underway with the responses to the schedule 5 Notice with the exception of the questions relating to the screening operation which is dependant upon the forthcoming meeting between FCC and the EA (through Richard Hadley). We hope to get the part response over to you next week.

P45

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**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

[redacted]  
8 [redacted]

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**From:** Andy Stocks [mailto:[redacted]]  
**Sent:** 13 September 2021 11:06  
**To:** Dunmore, Katie [redacted]  
**Subject:** Daneshill Permit Application - EPR/NP3538MF/V009

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Having spoken with FCC further they have asked whether it would be helpful for you if they and their contractors Provectus undertook a video presentation of the proposed treatment process at Daneshill , with photos etc to assist you and answer any general questions you may have.

If this would be of interest , can you give me some available dates and times over the next week or so, and I'll try and arrange it

Regards

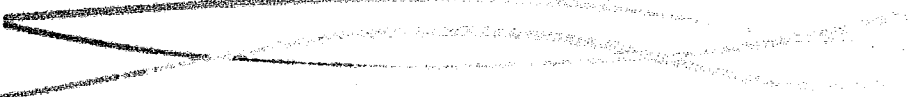
Andy



**Andy Stocks** **Caulmert Limited**

Director of Environment Mobil: [REDACTED]  
[REDACTED] Direct: [REDACTED]  
[www.caulmert.com](http://www.caulmert.com) Phone: [REDACTED]

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**Kellie Burston**

---

**From:** Kellie Burston  
**Sent:** 22 July 2021 15:21  
**To:** Dunmore, Katie  
**Subject:** RE: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Thank you Katie – look forward to hearing from you.

Kind Regards  
Kellie

**From:** Dunmore, Katie <[redacted]>  
**Sent:** 22 July 2021 13:15  
**To:** Kellie Burston <[redacted]>  
**Subject:** RE: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Thanks Kellie,

We've located the payment. We have everything to duly make this application now. Formal notification will be with you shortly.

I'll be in touch as determination progresses.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
☎ [redacted]  
8 [redacted]

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**From:** Kellie Burston. [mailto:[redacted]]  
**Sent:** 21 July 2021 15:15  
**To:** Dunmore, Katie <[redacted]>  
**Subject:** FW: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Afternoon Katie,

Following on from my previous email – please see attached the remittance advice showing the payment reference for the additional £8000.50: PSCAPPFCCDHILL

Kind Regards

**Kellie Burston**

**From:** Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>  
**Sent:** 22 July 2021 13:15  
**To:** Kellie Burston  
**Subject:** RE: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

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**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
 ☎ 02030 254435 (internal 54435) mob: 07584 369561  
 8 [katie.dunmore@environment-agency.gov.uk](mailto:katie.dunmore@environment-agency.gov.uk)

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<http://www.smartsurvey.co.uk/s/NPScustomer/>



**From:** Kellie Burston [mailto:KellieBurston@Caulmert.com]  
**Sent:** 21 July 2021 15:15  
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**From:** Kellie Burston <KellieBurston@Caulmert.com>  
**Sent:** 21 July 2021 13:02  
**To:** Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>  
**Subject:** RE: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Afternoon Katie,

**Kellie Burston**

---

**From:** Kellie Burston  
**Sent:** 21 July 2021 15:15  
**To:** Dunmore, Katie  
**Subject:** FW: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009  
**Attachments:** EA Remittance 160721.pdf

Afternoon Katie,

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**From:** Kellie Burston <[redacted]>  
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**To:** Dunmore, Katie <[redacted]>  
**Subject:** RE: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Afternoon Katie,

I have spoken to FCC who have advised that the payment was made on the 16<sup>th</sup> July, it is usually made alongside bulk payment and sent with a remittance advice showing the payment reference for this application. FCC are also sending me the remittance advice.

Kind Regards

Kellie

**From:** Dunmore, Katie <[redacted]>  
**Sent:** 21 July 2021 10:15  
**To:** Kellie Burston <[redacted]>  
**Subject:** RE: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Hi Kellie,

We still haven't received payment. Please provide a date when this will be processed. As you know I cannot proceed further until the application is duly made and it is now blocking other work. The application will be returned if we have not received payment by Monday.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
☎ 03000 83155 (ext 4435) [katie.dunmore@environment-agency.gov.uk](mailto:katie.dunmore@environment-agency.gov.uk)

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[redacted]  
[redacted]  
[redacted]

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**From:** Kellie Burston [mailto:Kellie.Burston@cepa.gov.uk]  
**Sent:** 13 July 2021 11:41

BS1

**Kellie Burston**

---

**From:** Dunmore, Katie <katie.dunmore@environment.gov.uk>  
**Sent:** 21 July 2021 10:15  
**To:** Kellie Burston  
**Subject:** RE: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

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**Sent:** 13 July 2021 11:41  
**To:** Dunmore, Katie <katie.dunmore@environment.gov.uk>  
**Subject:** RE: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Good Morning Katie,

Thank you for your email – the additional fee is being processed, I understand that FCC have formal steps to follow when authorising BACS payments. I have been assured that it should be with you shortly.

Kind Regards  
Kellie

**From:** Dunmore, Katie <katie.dunmore@environment.gov.uk>  
**Sent:** 13 July 2021 11:26  
**To:** Kellie Burston <kellie.burston@environment.gov.uk>  
**Subject:** RE: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

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**Subject:** RE: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Hi Kellie,

Thanks, we now have everything to duly make this except the additional fee. Its three weeks since the initial request, could you let me know when this will be paid.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

☒ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
[redacted]  
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**From:** Kellie Burston [mailto:[redacted]]  
**Sent:** 09 July 2021 13:17  
**To:** Dunmore, Katie <[redacted]>  
**Cc:** James Cook <[redacted]>  
**Subject:** FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Good afternoon Katie,

**Kellie Burston**

---

**From:** Dunmore, Katie <katie.dunmore@caulmert.com>  
**Sent:** 13 July 2021 11:26  
**To:** Kellie Burston  
**Subject:** RE: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Hi Kellie,

Thanks, we now have everything to duly make this except the additional fee. Its three weeks since the initial request, could you let me know when this will be paid.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
☎ [Redacted]  
8 [Redacted]

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**From:** Kellie Burston [mailto:kellie.burston@caulmert.com]  
**Sent:** 09 July 2021 13:17  
**To:** Dunmore, Katie <katie.dunmore@caulmert.com>  
**Cc:** James Cook <james.cook@caulmert.com>  
**Subject:** FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Good afternoon Katie,

From our phone call conversation on Wednesday 7<sup>th</sup> July, please see attached the revised 'Treatment Process Description & Indicative BAT Review: Establishing BAT Conclusions for Waste Treatment', document ref. 3982-CAU-XX-XX-RP-V-0306.A0.C3.

Please do not hesitate to call me should you need to discuss further.

Kind Regards

Kellie





**Kellie Burston**

**From:** Kellie Burston  
**Sent:** 09 July 2021 13:17  
**To:** Dunmore, Katie  
**Cc:** James Cook  
**Subject:** FCC Recycling Limited not duly made request. EPR/NP3538MF/V009  
**Attachments:** 3982-CAU-XX-XX-RP-V-0306-A0.C3 BAT (Final).pdf

Good afternoon Katie,

From our phone call conversation on Wednesday 7<sup>th</sup> July, please see attached the revised 'Treatment Process Description & Indicative BAT Review: Establishing BAT Conclusions for Waste Treatment', document ref. 3982-CAU-XX-XX-RP-V-0306.A0.C3.

Please do not hesitate to call me should you need to discuss further.

Kind Regards

Kellie



<b>Kellie Burston</b>	<b>Caulmert Limited</b>
Senior Environmental Consultant	Mobile: [REDACTED]
[REDACTED]	Direct: [REDACTED]
www.caulmert.com	Phone: [REDACTED]
	Extension: [REDACTED]
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**Kellie Burston**

---

**From:** Kellie Burston  
**Sent:** 06 July 2021 13:43  
**To:** Dunmore, Katie  
**Subject:** RE: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Thank you Katie

**From:** Dunmore, Katie <katie.dunmore@environment.gov.uk>  
**Sent:** 06 July 2021 13:41  
**To:** Kellie Burston <k.burston@fccrecycling.com>  
**Subject:** RE: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Thanks Kellie,

I am here and confirm receipt. I'll be in touch shortly.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

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☎ 0300 067 8686 (UK) / 0300 067 8687 (International)  
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**From:** Kellie Burston [mailto:k.burston@fccrecycling.com]  
**Sent:** 06 July 2021 13:28  
**To:** Dunmore, Katie <katie.dunmore@environment.gov.uk>  
**Subject:** FW: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Good afternoon Katie,

I hope you are well, please see below our responses to the Not Duly Made request: EPR/NP3538MF/V009

- Additional fee of £8,000.50. The removal of asbestos from contaminated soils is a distinct activity within its own right under S5.3 A (1)(a)(ii) Physico-chemical treatment of hazardous waste. The fee is reduced by 50% as detailed without our charging scheme.

**Kellie Burston**

**From:** Dunmore, Katie  
**Sent:** 06 July 2021 13:41  
**To:** Kellie Burston  
**Subject:** RE: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Thanks Kellie,

I am here and confirm receipt. I'll be in touch shortly.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

8 Kellie Burston

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**From:** Kellie Burston [mailto:Kellie.Burston@ea.gov.uk]  
**Sent:** 06 July 2021 13:28  
**To:** Dunmore, Katie  
**Subject:** FW: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Good afternoon Katie,

I hope you are well, please see below our responses to the Not Duly Made request: EPR/NP3538MF/V009

- Additional fee of £8,000.50. The removal of asbestos from contaminated soils is a distinct activity within its own right under S5.3 A (1)(a)(ii) Physico-chemical treatment of hazardous waste. The fee is reduced by 50% as detailed without our charging scheme.  
The payment for the additional fee of £8000.50 has been raised and scheduled by FCC, I am waiting for notification from FCC that the payment transaction has been authorised, usually their accounts department let me know a few days after payment.
- Provide an EWC list for the wastes to be processed through the asbestos treatment line.  
Please see attached EWC list
- Revised BAT document produced in line with the waste treatment BAT Conclusions 2018. SGN 5.06 whilst still a useful guide has been superseded by the BATC and we expect operations to be in line with this.

**Kellie Burston**

**From:** Kellie Burston  
**Sent:** 06 July 2021 13:28  
**To:** Dunmore, Katie  
**Subject:** FW: FCC Recycling Limited not duly made request. EPR/NP3538MF/V009  
**Attachments:** Table 1c Asbestos Waste Codes.pdf; 3982-CAU-XX-XX-RP-V-0306-A0.C2 BAT Final .pdf

Good afternoon Katie,

I hope you are well, please see below our responses to the Not Duly Made request: EPR/NP3538MF/V009

- Additional fee of £8,000.50. The removal of asbestos from contaminated soils is a distinct activity within its own right under S5.3 A (1)(a)(ii) Physico-chemical treatment of hazardous waste. The fee is reduced by 50% as detailed without our charging scheme.  
The payment for the additional fee of £8000.50 has been raised and scheduled by FCC, I am waiting for notification from FCC that the payment transaction has been authorised, usually their accounts department let me know a few days after payment.
- Provide an EWC list for the wastes to be processed through the asbestos treatment line.  
Please see attached EWC list
- Revised BAT document produced in line with the waste treatment BAT Conclusions 2018. SGN 5.06 whilst still a useful guide has been superseded by the BATC and we expect operations to be in line with this.  
Please see attached revised BAT document, ref: 3982-CAU-XX-XX-RP-V-0306-A0.C2

I did try both your mobile and landline number, and left a voicemail on your mobile. It was to briefly left you know about the NDM response I am submitting. Any issues please do not hesitate to get in touch.

Kind Regards

Kellie



<b>Kellie Burston</b>	<b>Caulmert Limited</b>
Senior Environmental Consultant [Redacted] www.caulmert.com	Mobile: [Redacted] Direct: [Redacted] Phone: [Redacted] Extension: [Redacted]

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**From:** Dunmore, Katie [redacted]  
**Sent:** 22 June 2021 15:48  
**To:** Andy Stocks <[redacted]>  
**Subject:** FCC Recycling Limited not duly made request. EPR/NP3538MF/V009

Hi Andy

As discussed, I've received the above application for assessment. Before I begin the following additional information is required:

- Additional fee of £8,000.50. The removal of asbestos from contaminated soils is a distinct activity within its own right under S5.3 A (1)(a)(ii) Physico-chemical treatment of hazardous waste. The fee is reduced by 50% as detailed without our charging scheme.
- Provide an EWC list for the wastes to be processed through the asbestos treatment line.
- Revised BAT document produced in line with the waste treatment BAT Conclusions 2018. SGN 5.06 whilst still a useful guide has been superseded by the BATC and we expect operations to be in line with this.

Please provide the requested information with two weeks by 06/07/2021.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
[redacted]  
8 [redacted]

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**Kellie Burston**

---

**From:** Kellie Burston  
**Sent:** 22 June 2021 08:48  
**To:** Dunmore, Katie  
**Cc:** Andy Stocks  
**Subject:** RE: Daneshill Landfill Soil Treatment Facility EPR/NP3538MF/V009

You're welcome Katie! Andy will be the application contact

Kind Regards

Kellie

**From:** Dunmore, Katie <[redacted]>  
**Sent:** 21 June 2021 16:45  
**To:** Kellie Burston <[redacted]>  
**Subject:** RE: Daneshill Landfill Soil Treatment Facility EPR/NP3538MF/V009

Thanks Kellie,

Yes, I could see it was included I was unable to download it.

Going forward will you be the application contact or Andy?

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
[redacted]  
8 [redacted]

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**From:** Kellie Burston [mailto:[redacted]]  
**Sent:** 21 June 2021 15:46  
**To:** Dunmore, Katie <[redacted]>  
**Subject:** FW: Daneshill Landfill Soil Treatment Facility EPR/NP3538MF/V009

**Kellie Burston**

---

**From:** Dunmore, Katie <k[redacted]>  
**Sent:** 21 June 2021 16:45  
**To:** Kellie Burston  
**Subject:** RE: Daneshill Landfill Soil Treatment Facility EPR/NP3538MF/V009

Thanks Kellie,

Yes, I could see it was included I was unable to download it.

Going forward will you be the application contact or Andy?

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

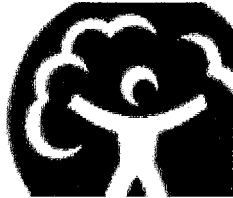
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**From:** Kellie Burston [mailto:[redacted]]  
**Sent:** 21 June 2021 15:46  
**To:** Dunmore, Katie <k[redacted]>  
**Subject:** FW: Daneshill Landfill Soil Treatment Facility EPR/NP3538MF/V009

Good Afternoon Katie,

Andy Stocks has passed your query on to me, I am having a look at the original email sent to PSC on the 22<sup>nd</sup> January 2021. I can see that the BAT document has been included in the application pack via a document link, however it may have expired. Please see attached a pdf copy of the document, do not hesitate to get in touch should you require any other information.

Kind Regards

Kellie

**Kellie Burston**

**From:** Kellie Burston  
**Sent:** 21 June 2021 15:46  
**To:** [Redacted]  
**Subject:** FW: Daneshill Landfill Soil Treatment Facility EPR/NP3538MF/V009  
**Attachments:** 3982-CAU-XX-XX-RP-V-0306-A0.C1 BAT (Jan Final).pdf

Good Afternoon Katie,

Andy Stocks has passed your query on to me, I am having a look at the original email sent to PSC on the 22<sup>nd</sup> January 2021. I can see that the BAT document has been included in the application pack via a document link, however it may have expired. Please see attached a pdf copy of the document, do not hesitate to get in touch should you require any other information.

Kind Regards

Kellie



**Kellie Burston** **Caulmert Limited**

Senior Environmental Consultant

[Redacted]

www.caulmert.com

Mobile: 0 [Redacted]

Direct: [Redacted]

Phone: [Redacted]

Extension: [Redacted]

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**From:** Dunmore, Katie <katie.dunmore@caulmert.com>  
**Sent:** 21 June 2021 14:31  
**To:** Andy Stocks <andy.stocks@caulmert.com>  
**Subject:** Daneshill Landfill Soil Treatment Facility EPR/NP3538MF/V009



**Kellie Burston**

**From:** Kellie Burston  
**Sent:** 21 June 2021 15:46  
**To:** [REDACTED]  
**Subject:** FW: Daneshill Landfill Soil Treatment Facility EPR/NP3538MF/V009  
**Attachments:** 3982-CAU-XX-XX-RP-V-0306-A0.C1 BAT (Jan Final).pdf

Good Afternoon Katie,

Andy Stocks has passed your query on to me, I am having a look at the original email sent to PSC on the 22<sup>nd</sup> January 2021. I can see that the BAT document has been included in the application pack via a document link, however it may have expired. Please see attached a pdf copy of the document, do not hesitate to get in touch should you require any other information.

Kind Regards

Kellie



<b>Kellie Burston</b>	<b>Caulmert Limited</b>
-----------------------	-------------------------

Senior Environmental Consultant  
 [REDACTED]  
[www.caulmert.com](http://www.caulmert.com)

Mobile: 0 [REDACTED]  
 Direct: [REDACTED]  
 Phone: [REDACTED]  
 Extension: [REDACTED]

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*[Faint, mostly illegible text, possibly a signature or additional contact information]*

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**From:** Dunmore, Katie <[REDACTED]>  
**Sent:** 21 June 2021 14:31  
**To:** Andy Stocks <[REDACTED]>  
**Subject:** Daneshill Landfill Soil Treatment Facility EPR/NP3538MF/V009

Hi Andy,

I've received the above application for assessment. Could you forward on me the BAT document? It hasn't been included in the application pack and I'm unable to download it from the link.

Once I've checked through all the information provided I'll be in touch with regards to duly making.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

☎ [redacted] (internal) [redacted] mob: [redacted]

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**Sarah Mills**

---

**From:** Kellie Burston  
**Sent:** 22 January 2021 08:25  
**To:** PSC Land  
**Cc:** James Cook; Jon Owens; Andy Stocks  
**Subject:** FCC Daneshill Soils Treatment Facility: Substantial Permit Variation  
**Attachments:** Part A.pdf; Part C2.pdf; Part C3.pdf; Part F.pdf; Daneshill Application Letter.pdf

To whom it may concern,

Please see attached the relevant application forms and application letter for the substantial variation permit application at Daneshill Soils Treatment Facility, below are document links for the relevant supporting documents. In addition, a payment for the amount of: **£35,859.60** under BACS reference: **PSCAPPFCCDANES** has been made to the EA.

Supporting Document

- <https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:a35e530b-ea18-48a3-89c1-00685d82e964>

Non-Technical Summary

- <https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:297f3756-8987-4be7-8c97-e2d83f86825f>

Amenity Risk Assessment

- <https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:09ca2ba9-572b-44a8-b8bb-99bba892d530>

BAT Report

- <https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:1510edcf-a354-469c-9710-85a25a9223b0>

ESID

- <https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:ec46478c-acf6-431e-a048-804d8063d8bc>

Emissions Management Plan

- <https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:edf7f342-b709-4b0a-bf17-28bd659e8336>

Odour Management Plan

- <https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:4bda21ae-62fb-4fff-a0e3-3248163be3b4>

Operational Techniques Report

- <https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:62dbfe21-057a-478d-80fe-1f973ffea956>

I trust everything is in order, however please do not hesitate to get in touch.

Kind Regards

Kellie



Senior Environmental Consultant

K. [REDACTED]

[www.caulmert.com](http://www.caulmert.com)

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Direct:

Phone: 0115 95 00000

Extension: 1000

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