

# Notice of request for more information

## The Environmental Permitting (England & Wales) Regulations 2016

---

Company Director

Ground Floor West  
900 Pavilion Drive  
Northampton Business Park  
Northampton  
NN4 7RG

Application number: EPR/NP3538MF/V009

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit duly made on 16/07/2021.

Send the information to either the email or postal address below by 01/10/2021. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

Email address: [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk).

Postal address:

Permitting and Support Centre  
Quadrant 2  
99 Parkway Avenue  
Parkway Business Park  
Sheffield  
S9 4WF

Name	Date
Katie Dunmore	06/08/2021

Authorised on behalf of the Environment Agency

**Notes**

These notes do not form part of this notice.

Please note that we charge £1,200 where we have to send a third or subsequent information notice in relation to the same issue. We consider this to be the first notice on the issues covered in this notice.

The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.

## Schedule

### Site plan

1. Provide a revised site layout plan which shows the site infrastructure in greater detail. The plan must be labelled and to scale and show how the site has been designed to ensure segregation of hazardous and non-hazardous waste along with asbestos contaminated soils. As a minimum it must include:
  - waste stockpile locations – reception and sampling areas, treatment and post treatment storage
  - raw materials and fuels (including bunding)
  - key plant items such as the location of the screening plant and asbestos picking station (show conveyors with inputs both in and out)
  - asbestos storage skips
  - vehicle wheel wash
  - storage of mobile plant such as excavators
  - asbestos decontamination areas and control zones
  - equipment wash down areas
  - water treatment compound
  - biofilter

### Drainage system

2. Provide a revised drainage plan which shows how waters falling onto the wider site are captured and channelled. Site surfacing must be labelled and the location of the vehicle wheel wash and equipment wash-down areas shown along with an explanation of how these waters are captured and contained. The plan must also show any surface water discharge points from the STF area.
3. Explain how the asbestos storage and treatment pad will be designed to ensure that surface waters falling on the pad will be retained and channelled to the collection sump.
4. Explain how water will be transferred from the collection sumps to the water treatment system. Include any pipework on the revised drainage plan.
5. Explain the containment measures provided for the water treatment compound, waste, raw materials and fuels storage areas. Include these on the revised plan.
6. Explain any additional precautions proposed when dealing with waters captured from the treatment pads including measures to prevent over pumping into the system.
7. Provide details of any additional measures in place to deal with waters captured from the asbestos treatment pad and asbestos wash down areas.

*Reason – the water treatment proposed involves adsorption and settlement. Measures which will capture hydrocarbon contaminants and settle out sediments. They however will not capture asbestos fibres. We are concerned any fibres present in surface waters will pass through the treatment plant and potentially be reused or enter the wider environment.*

### Asbestos Soil Treatment

8. Are asbestos contaminated soils expected to be contaminated with hydrocarbons or other contaminants. Once treated will these be directed to the bioremediation process?
9. Do you require code 17 05 04 to also be included for asbestos treatment?  
*Reason – We consider soils contaminated with asbestos sheeting to be consigned under two waste codes, the base soil and separate asbestos sheeting. Provided waste acceptance confirms the fibre*

*count to be below 0.01% and the material does not contain other hazardous components the separate non-hazardous soil code may be required.*

10. Explain what compliance sampling and testing is undertaken prior to asbestos soil being accepted on site. This must include the parameters sampled and the parameters used. Please also confirm the frequency of testing. You must demonstrate your pre-acceptance and acceptance procedures and testing can accurately identify the type and quantity of fibres present.

*Reason – Its noted section 2.2.2 of the Emissions Management Plan and other documents confirm waste will be accepted subject to satisfactory pre-acceptance checks and this is carried out to confirm free asbestos fibres are not above 0.1% for chrysotile asbestos and 0.01% for other forms. You must demonstrate how your procedures and testing can accurately identify the type and quantity of fibres present.*

*It's not clear if the Waste Acceptance Procedures provide with the BAT document also cover the acceptance of asbestos soils. It appears to be geared to the bioremediation process. You must provide full details of the acceptance criteria for asbestos contaminated soils.*

11. Your waste acceptance procedures must be revised to explain how asbestos soils will be received and deposited into the quarantine and storage areas in a way that minimises dust emissions. You must also details of the maximum quantity of waste stored at any one time for soils whilst awaiting treatment and post treatment.

*Reason – Limited information has been provided regarding the measures in place to minimise emissions when handling soils. It's not clear if waste is stored in bays or mounds. As detailed within our guidance storage areas should be clearly marked and signed. All bays or locations containing asbestos should be labelled and turnover periods for all waste stored prior and post asbestos picking activity detailed. You must also provide stockpile dimensions.*

12. Explain how asbestos soils are processed through the three way screen in a way that eliminates asbestos fibre release from the soil and asbestos fragments as they pass through the screen. You must detail all proposed abatement techniques and demonstrate how this meets BAT 14 with regard to the containment, collection and treatment of diffuse emissions.

13. Provide details of the measures in place to prevent dust and asbestos fibre emissions when loading asbestos waste onto the picking line. Is the conveyor covered?

14. Provide details of how waste soil following picking will be transferred to the post treatment storage location which minimises dust and fibre emissions.

15. Explain the procedure in place for dealing with picked asbestos fragments. Are they double bagged on the picking line? How are the bagged pieces deposited within the skip?

16. Explain if there is an emissions abatement in the picking booth. If not explain how airborne fibre emissions are captured and contained.

*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

17. Provide details of the asbestos decontamination procedures in place for both staff and equipment.

*Reason – the measures described are not sufficiently detailed. You must explain the wet cleaning techniques used and how waters are captured etc. We would expect areas of the site dealing with asbestos contaminated materials to be clearly demarked, access restricted and clear techniques described for the decontamination of staff and equipment.*

18. Clarify the post treatment sampling and testing undertaken on the asbestos soils. Explain how these samples are analysed and what thresholds dictate what happens next to the treated soils.

*Reason – Section 2.5.1 of the BAT assessment details testing is undertaken but provides no further clarification. Its noted table 5 of the STC compliance testing and sampling document details output compliance testing is the same for inputs but again this appears specific to the bioremediation process. You must explain the fibre sampling specific to the asbestos soils to ensure treatment and handling has not increased fibre concentrations.*

19. Clarify the asbestos fibre monitoring proposed during soil screening activities. Explain if there are static monitoring points and if separate personal monitoring for staff is undertaken.

20. Clarify if all asbestos monitoring locations have been identified on plan 3982-CAU-XX-XX-DR-V-1803. Revise the plan if necessary.

*Reason – This plan details 4 boundary locations. Table 2 of the EMP confirms monitoring is also undertaken around the treatment area during screening. These locations must also be included.*

### Bioremediation

21. Clarify the arrangements for waste acceptance verification testing specifically the frequency of reception sampling. You must also demonstrate that the site has sufficient space to isolate loads whilst they wait for acceptance analysis.

*Reason – Table 1 of the BAT document copied from table 1 of the Provectus STC –FO03 details sampling at a different rate to Table 1 of the separate Waste Acceptance procedure STC document.*

22. Explain if the same screening equipment is used for hazardous, non-hazardous and asbestos containing waste. Explain the procedures in place to ensure hazardous and non-hazardous wastes are stored and treated separately. Detail the operating techniques in place to avoid cross contamination.

*Reason – The cross-contamination and clean down procedures detailed in section 4.5 of the BAT document provide some discussion of the wet wash down procedures used to remove asbestos fibres when mobile machinery is removed from site. This however is not sufficiently detailed. You must provide clarification as to whether the same equipment is used for screening hazardous/non-hazardous and asbestos wastes, the decontamination procedures used and if its moved between working areas the measures to prevent cross contamination etc.*

23. Provide details of the management procedures in place to prevent fugitive emissions (dust, VOC and odour) resulting from waste handling and biopile turning operations. Include information on how additives are applied to the biopiles and how long biopiles are likely to remain open.

*Reason – You must demonstrate the measures in place meet BAT5. Waste handling techniques have not been adequately described. For example the soil turnover procedure details how this is undertaken but not how emissions are minimised. These techniques must also be clearly detailed in the EMP. See below for further clarification.*

24. Provide details of the storage location, maximum storage time, volume and pile size of each waste material stored for use in the biopiles and biofilter - 17 02 01 - wood, 19 05 03 – off specification compost, 19 12 07 – wood and 20 03 03 – leaf litter. These locations must be labelled on the site plan. You must demonstrate there are appropriate procedures in place for the storage of these combustible wastes.

We may require you to produce a Fire Prevention Plan in line with our Guidance [Link](#). An additional fee may be required.

Describe how each individual waste detailed above will benefit the remediation process. Clearly explain what it is, why it is added and provide a demonstration that the waste is necessary for treatment. You must explain the waste acceptance procedures to ensure the waste are suitable for the process and will not add further contaminants which may negatively impact the bioremediation process.

Provide details of the mixing ratios for all raw materials, both waste and non-waste

*Reason – It's noted there is some description provided regarding the use of leaf litter.*

*Its noted woodchip will be added to clayey soils and stored in an articulated lorry. This however is not sufficient detail to assess the fire risk and detail remains patchy. No discussion has been provided regarding the use of off specification compost which is derived from municipal waste and highly variable in nature.*

25. What are the treatment standards you are aiming to achieve by bioremediation for both hazardous and non-hazardous waste? At what concentration levels are the wastes considered treated?

*Reason – BAT is to set up and implement and output quality management system that ensures that the output of the treatment is in line with expectations and objectives prior to treatment. It's noted the objective of treatment is to provide a material suitable for restoration of the landfill and use within the access road. The quality standards aimed for however are not clear.*

26. Explain what contaminants are expected to be in the following wastes;  
EWC 05 01 15\* spent filter clays, 17 09 03\* Hazardous C&D waste and 17 09 04 Non-hazardous C&D. Explain how they will be treated and why this will render them suitable for reuse on site. Explain the sampling and testing proposed.

27. Clarify the biofilter monitoring proposed. Explain the parameters and the frequencies chosen.

*Reason - Provectus report STC – WI 007 states the biofilter will be monitored monthly through a lab for VOC, Spectated PAH and TPH plus bimonthly onsite sampling using a PID. This information however has not been replicated in Table 2 within the Emissions Management Plan which states biofilter monitoring will be 6 monthly for Ammonia, TVOC and Hydrogen Sulphide please confirm*

28. Clarify the process monitoring proposed for the biopiles.

*Reason - its noted pH, temperature, moisture content, Oxygen level and nutrient concentrations are monitored, please confirm how often.*

#### Water treatment system

29. Clarify what measures are in place to ensure the water treatment plants efficiency. Provide details of monitoring, measures to prevent over pumping into the system, alarms etc
30. What are the size of the storage tanks? How do you know this is sufficient to contain runoff from the treatment pads?
31. Provide the design details of the tanks including pipework and containment.

32. Provide details of how asbestos fibres will be captured and contained.

### Emissions Management Plan

33. The document must be revised to remove reference to a waste treatment building which has been referenced several times as mitigation for screening and hand picking.

34. A site layout plan must be included within the EMP. This must be drawn to scale and include all detail as stated in the site layout request above along with visuals of suppression equipment such as nozzle heads and the spray arcs they reach.

35. Provide details of the wheel wash. Is this a specifically designed wash of a jet washing area? Explain how waters are contained and disposed of. Explain what measures are in place to ensure the wheel wash has done its job.

36. Describe how the site infrastructure is designed to prevent dust and particulate emissions from leaving the site boundary.

*Reason – The EMP does not provide any detail as to the passive pollution prevention measures in place. You must detail all measures in place through each activity. Include stockpile heights, storage bays, freeboard, stockpile orientation etc. Link to the revised site plan as requested above.*

37. Considering the above the EMP must be revised to include a detailed source pathway receptor table which identifies the mitigation measures to reduce the pathway to receptors.

*Reason – The measures provided in the plan do not detail the infrastructure standards or waste handling measures expected. Section 4.2.2 identifies a number of potential emissions sources which are then not expanded upon in section 6. Remove reference to the construction phase of the project. We are concerned with emissions from waste handling and treatment operations only.*

38. Provide details of the water based suppression system in more detail including:

- Which stockpiles have water sprinklers (show these on the site plan)
- If suppression is provided within the picking booth (6.1.23 indicates this but no further detail is provided)
- Explain if the sprinkler on the screener is fixed into position or mobile
- Explain if the stockpile sprinklers are fixed into position
- Explain if they are fed from water storage or mains
- Demonstrate there is sufficient supply and pressure to provide water to all the sprinklers and cannons as necessary

If treated water from the site treatment system is to be used what is the testing criteria to ensure the water is suitable for use and will not result in contamination of the site.

*Reason: The Emissions Management Plan makes reference to water suppression when handling asbestos contaminated soils and screening soils. We however would anticipate suppression to be in place for all soil handling operations and when screening hazardous and non-hazardous (non-asbestos soils) this should be made clear.*

39. Provide details of the management procedures for fugitive emissions of (VOC, odour) resulting from waste handling, screening and biopile turning operations. How long are biopiles likely to remain open?

*Reason – You must demonstrate measures in place meet the requirements of BAT 5. Waste handling measures have not been adequately described for example the soil turnover procedure details how this is undertaken but not how emissions are minimised.*

*The EMP provides little detail of the measures in place to prevent emissions of VOC from hydrocarbon contaminated soils particularly when screened.*

40. Revise the PM10 emissions from vehicles section with reference to the Daneshill site. This is geared to deliveries with regards to a building and confirms a “tenfold reduction in PM10 emissions compared to existing”. Please make it relevant to the activities at Daneshill. Provide details of the site specific measures here including details of haul routes and one way systems.
41. Provide clear details of the asbestos monitoring proposed at each separate stage of the process from storage, through treatment and final deposition post treatment. Include all detail within table 2 of the EMP.  
*Reason – the details provided are vague. The EMP states monitoring will be undertaken hourly during screening and it will be also be undertake doing treatment of soils and hand picking. Specific detail is not provided. You must show the monitoring points on the site plan (see above). Provide details of how the monitoring is undertaken and if separate personal monitoring is undertaken.*
42. Explain the actions that will be undertaken if air testing during handpicking or screening shows exceedances of 0.01fibres/ml.  
*Reason – its noted measures are included within the BAT document. For completeness they should also be included within the EMP.*
43. Provide details of the daily visual dust monitoring proposed. Include the locations on the emissions monitoring plan. Include the visual monitoring check sheet in the EMP. Explain what happens if visual monitoring identifies nuisance dust emissions.
44. Revise the emissions monitoring plan to include the visual monitoring locations for dust, the locations of the Frisbee gauges and the VOC monitoring location. The locations of the asbestos pumps to be located around the working area during soil moving must also be included.

#### Odour management Plan

45. The OMP makes reference to 19 02 06 and 19 12 12 as potentially malodourous waste. These wastes however have not been included as proposed wastes in the main application documents, please clarify.
46. Explain the waste pre-acceptance and acceptance procedures for these potentially malodourous wastes. Explain how their odour potential is assessed.  
  
*Reason – The OMP indicates this information is available in the soil reception procedure however this document does not mention potentially odorous wastes.*