

## Kellie Burston

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**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



Kellie Burston

Caulmert Limited

Senior Environmental Consultant

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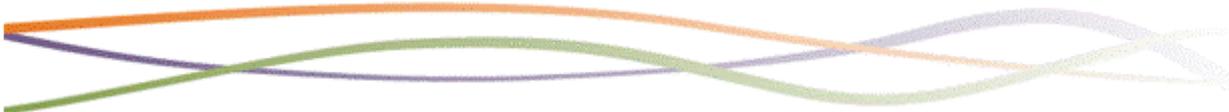
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**From:** Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

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

**To:** Kellie Burston <KellieBurston@Caulmert.com>

**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 chooses 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**

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