

Kellie Burston

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
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: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Kellie Burston [mailto:KellieBurston@Caulmert.com]
Sent: 02 February 2022 11:04
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
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.

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 <katie.dunmore@environment-agency.gov.uk>

Sent: 31 January 2022 10:09

To: Kellie Burston <KellieBurston@Caulmert.com>

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
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From: Dunmore, Katie

Sent: 31 January 2022 09:27

To: Kellie Burston <KellieBurston@Caulmert.com>

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

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From: Kellie Burston [<mailto:KellieBurston@Caulmert.com>]

Sent: 20 January 2022 11:14

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

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*

This waste code will cover small volumes of soil materials removed from skips and stored on metal recycling sites. This soil material has low levels of hydrocarbons (diesel and lubricating oils) that are treatable but it is very much a site specific waste stream relating to the customer operation. Outputs will be soil based and suitable for restoration as 19 13 02, alternatively 19 02 06 for the road sweepings soil outputs & 19 12 12 for soil output materials that came in as 19 11 11*.

The Operator has confirmed that there is no intention to treat chemical waste filter cake outputs or trommel fines from MSW/C&I type operations.

I hope this answers your query

Kind Regards
Kellie

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 07 January 2022 16:22
To: Kellie Burston <KellieBurston@Caulmert.com>
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
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From: Kellie Burston [<mailto:KellieBurston@Caulmert.com>]
Sent: 07 January 2022 15:47
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
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

Kellie Burston

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

Sent: 07 January 2022 14:50

To: Kellie Burston <KellieBurston@Caulmert.com>

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

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