

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 39821808 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 conveyor 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.

Please see attached document ref: Daneshill Bat 14 Response

Kind Regards
Kellie

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 07 February 2022 16:45
To: Kellie Burston <KellieBurston@Caulmert.com>
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
📧 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
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: 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

Katie Dunmore
Permitting Officer
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✉ 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: 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
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: 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	Caulmert Limited
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Senior Environmental Consultant
KellieBurston@Caulmert.com
www.caulmert.com

Mobile: 07494 170 309
Direct: 01773 305 048
Phone: 01773 749132

Nottingham Office • Strelley Hall, Main Street • Strelley, Nottingham • NG8 6PE • United Kingdom



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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

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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