

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 If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused.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.

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

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

- 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 meat 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.

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 to detail 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.



Environment
Agency

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Waste Recycling Group (Central) Limited
Edwin Richards Quarry - Soil Treatment Centre
Portway Road
Rowley Regis
Warley
West Midlands
B65 9BT

Variation application number

EPR/HP3632RP/V003

Permit number

EPR/HP3632RP

Status log of the permit		
Description	Date	Comments
(PAS Billing ref. HP3632RP)		
Application EPR/HP3632RP/V002 (variation and consolidation)	Duly made 16/11/17	Application to vary the permit to add hand picking of identifiable pieces of bonded asbestos from waste soil. Waste code 19 12 07 is also added to Table S2.3 for the bioremediation process. As part of this variation a consolidated permit has been issued.
Variation determined EPR/HP3632RP/V002	26/02/18	Varied permit issued.
Application EPR/HP3632RP/V003 (variation and consolidation)	Duly made on 05/11/2019	Application to <ul style="list-style-type: none"> • Amend the split of hazardous / non-hazardous waste treated at the facility; • Permit acceptance of wastes classified as hazardous HP10 (toxic for reproduction); • Addition of EWC Codes 19 12 11* and 19 12 12 to Table S2.3; • Addition of code R5 to Table S1.1 to enable equivalent treatment activities to S5.3 A(1)(a)(i) and S5.4 A(1)(b)(i) for recovery as well as disposal; • Increase of non-hazardous waste storage limit from 100,000 tonnes to 150,000 tonnes; • Amendment to Table S1.1 Activity S5.6 A(1)(a) or addition of a new activity for the temporary external storage of up to 10,000 tonnes untreated hazardous soils containing asbestos pending further treatment or transfer off-site; • Permission to pre-screen soils containing bound asbestos debris; and, • Removal of the dewatering and solidification activities.
Additional information received response to schedule 5 notice	22/06/2020, 26/06/2020 & 14/07/2020	Letters with responses including, removal of EWC codes 17 09 03* & 17 09 04 to Table S2.6 from the application and 30 M ³ limit of storage of waste woodchip only.
Additional information received response to schedule 5 notice	16/07/2020	Letter with responses including drawing no. 100993 – Asbestos DWG2/Rev 2 dated June 2020 (drainage plan) and a revised H1 assessment in connection with water discharges from the site.
Additional information received response to schedule 5 notice	02/11/2020	Email requesting a change in annual throughput for both hazardous and non-hazardous wastes. Other documents submitted: - An updated Environmental Risk assessment,

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPR/HP3632RP

Issued to

Waste Recycling Group (Central) Limited ("the operator")

whose registered office is

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

company registration number 04000033

to operate a regulated facility at

**Edwin Richards Quarry - Soil Treatment Centre
Portway Road
Rowley Regis
Warley
West Midlands
B65 9BT**

to the extent set out in the schedules.

The notice shall take effect from 02/06/2021

Name	Date
Daniel Timney	02/06/2021

Authorised on behalf of the Environment Agency

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/HP3632RP

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/HP3632RP/V003 authorising,

Waste Recycling Group (Central) Limited ("the operator"),

whose registered office is

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

company registration number 04000033

to operate an installation at

**Edwin Richards Quarry - Soil Treatment Centre
Portway Road
Rowley Regis
Warley
West Midlands
B65 9BT**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Daniel Timney	02/06/2021

Authorised on behalf of the Environment Agency

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").
- 2.1.2 Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation ("plan") specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 tables S2.2, S2.3 and S2.4, and
 - (b) it conforms to the description in the documentation supplied by the producer and holder.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.
- 2.3.6 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

Hazardous waste storage and treatment

- 2.3.7 Hazardous waste shall not be mixed, either with a different category of hazardous waste or with other waste, substances or materials, unless it is authorised by schedule 1 table S1.1 and appropriate measures are taken.

2.4 Pre-operational conditions

- 2.4.1 The activities shall not be brought into operation until the measures specified in schedule 1 table S1.3 have been completed.

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
 - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
- (a) point source emissions specified in tables S3.1 and S3.2;
 - (b) process monitoring specified in table S3.3;
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by the Environment Agency.

3.6 Pests

- 3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.6.2 The operator shall:
- (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;
 - (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.7 Fire prevention

- 3.7.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.

- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

4.3.1 In the event:

- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
- (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
- (b) of a breach of any permit condition the operator must immediately—
- (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

4.3.2 Any information provided under condition 4.3.1(a)(i), or 4.3.1 (b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);

Schedule 1 – Operations

Table S1.1 activities			
Activity Reference No. and activity description	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
AR1 - Physical treatment of hazardous waste	S5.3A(1)(a)(ii)	<p>Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment</p> <p>D9: Physico-chemical treatment resulting in final compounds or mixtures which are discarded by any of the operations numbered D1 to D12</p>	<p>From receipt of hazardous waste to despatch for other on-site operations or off-site disposal.</p> <p>Physical treatment consisting of sorting, separation and screening of hazardous waste.</p> <p>All treatment and storage shall take place on an impermeable surface with a sealed drainage system</p> <p>Temporary storage of hazardous waste following treatment for off-site disposal.</p> <p>The hazardous waste specified in table S2.2</p>
AR2 - Asbestos removal from soils	S5.3A(1)(a)(ii)	<p>Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment</p> <p>D9: Physico-chemical treatment resulting in final compounds or mixtures which are discarded by any of the operations numbered D1 to D12</p>	<p>From receipt of hazardous waste through to storage of treated waste prior to being subject to bioremediation or sent off-site for disposal.</p> <p>Treatment consisting only of the following:</p> <ul style="list-style-type: none"> • Once pre-operational condition 1 has been given written permission the mechanical screening of waste soil prior to transfer to the hand picking line. • Hand picking of identifiable pieces of bonded asbestos from waste soils in a dedicated enclosed picking line <p>All treatment and storage shall take place on an impermeable surface with a sealed drainage system within the building (labelled as 'dust shed') as shown on drawing number 100993 – Asbestos DWG1 dated January 2018.</p>

Table S1.1 activities			
Activity Reference No. and activity description	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
		operations numbered D1 to D12	pending further treatment on-site or off-site disposal. The hazardous waste specified in table S2.3
AR5 - Bioremediation of hazardous waste for recovery	S5.3 A(1)(a)(i)	Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving biological treatment R5: Biological treatment	Bioremediation process for hazardous waste. All treatment and storage shall take place on an impermeable surface with a sealed drainage system Temporary storage of hazardous waste following bioremediation, pending further treatment on-site or off-site recovery. The hazardous waste specified in table S2.3. Notwithstanding the above, the following waste EWC codes shall not be treated for recovery purposes: 19 02 04*, 19 02 05*, 19 02 11* & 19 1211*
AR6 - Bioremediation of non-hazardous waste for disposal	S5.4A(1)(a)(i)	Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving biological treatment D8: Biological treatment resulting in final compounds or mixtures which are discarded by any of the operations numbered D1 to D12	Bioremediation process for non-hazardous waste. All treatment and storage shall take place on an impermeable surface with a sealed drainage system. Temporary storage of non-hazardous waste following bioremediation, pending further treatment on-site or off-site disposal. The non-hazardous wastes specified in table S2.3.
AR7 - Bioremediation of non-hazardous waste for recovery	S5.4A(1)(b)(i)	Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving biological treatment R5: Biological treatment	Bioremediation process for non-hazardous waste. All treatment and storage shall take place on an impermeable surface with a sealed drainage system.

Table S1.1 activities			
Activity Reference No. and activity description	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
			Hazardous wastes as specified in table S2.2 table S2.3 and table S2.4.
Directly Associated Activity			
AR9	Fuel storage	Storage of diesel.	From receipt of fuel to use on-site for power generation
AR10	Water storage	Collection and storage of process water	From collection of process water to re-use within the facility or discharge to foul sewer.
AR11	Waste storage	<p>Temporary storage of non-hazardous waste</p> <p>D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p>R13: Storage of waste pending the operations numbered R1 and R13 (excluding temporary storage, pending collection, on the site where it is produced)</p>	<p>Temporary storage of non-hazardous waste prior to treatment on site under activities AR3, AR6 and AR7 above.</p> <p>The maximum tonnage of non-hazardous waste stored on site, at any one time, shall not exceed 150,000 tonnes.</p> <p>Notwithstanding the above, the maximum volume of combustible waste (wood) on site at any one time shall not exceed 30m³.</p> <p>Storage of combustible waste shall take place on an impermeable surface with a sealed drainage system</p> <p>Non-hazardous wastes specified in table S2.2 and S2.3.</p>
AR12	Raw material storage	Temporary storage of raw materials including solidifying agents such as ash prior to use in the solidification process.	From the receipt of raw materials to despatch for use within the facility.
AR13	Effluent treatment plant	Treatment of process water prior and the re-use of such water on site to discharge from the site.	

Reference	Pre-operational measures
1	<p>Prior to the use of the mechanical screener for the pre-screening of asbestos contaminated soils under activity reference AR2 a report shall be submitted for written permission detailing the following aspects:</p> <ul style="list-style-type: none"> • Evidence to demonstrate that the mechanical screener is fully enclosed and all dust emissions from the screening operation are directed to an active abatement system with a HEPA filter or other suitable design. • Details of the proposed commissioning, operational and maintenance procedures associated with the mechanical screener and active abatement system to be implemented on site. • Details of monitoring checks, audits and emergency procedures to be implemented on site to ensure both the mechanical screener and active abatement system are fully operational and working as designed. <p>No mechanical pre-screening of asbestos contaminated soils under activity reference AR2 shall commence unless the Environment Agency has given prior written permission under this condition.</p>

Reference	Requirement	Date
IP1	<p>The Operator shall complete the site drainage works within the building (labelled as 'dust shed'), as detailed in point 3 of the Schedule 5 response dated 29/01/18, to:</p> <ul style="list-style-type: none"> • seal the redundant manholes; • install kerbing at both the entrance and exit; and • install a drainage sump to collect any excess runoff generated from the spraying of water used to control dust and asbestos fibres. <p>Following completion of these works the operator shall submit a revised site drainage plan to the Environment Agency.</p>	Completed

Table S2.2 Permitted waste types and quantities for physical treatment of waste	
Maximum quantity	In total no more than 89,999 tonnes per annum of hazardous waste and no more than 60,001 tonnes per annum of non-hazardous waste will be accepted for treatment at the site. Waste hazardous properties HP4 to HP7, HP14
Waste code	Description
13 05 08*	mixtures of wastes from grit chambers and oil/water separators
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 02	wood, glass and plastic
17 02 01	wood (consisting of untreated woodchips only)
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 03*	soil and stones containing hazardous substances
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 05*	dredging spoil containing hazardous substances
17 05 06	dredging spoil other than those mentioned in 17 05 05
17 05 07*	track ballast containing hazardous substances
17 05 08	track ballast other than those mentioned in 17 05 07
17 09	other construction and demolition wastes
17 09 03*	other construction and demolition wastes (including mixed wastes) containing hazardous substances
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 02	wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)
19 02 03	premixed wastes composed only of non-hazardous wastes
19 02 04*	premixed wastes composed of at least one hazardous waste – wastes suitable for biological treatment only
19 02 05*	sludges from physico/chemical treatment containing hazardous substances – wastes suitable for biological treatment only
19 02 06	sludges from physico/chemical treatment other than those mentioned in 19 02 05 – wastes suitable for biological treatment only
19 02 11*	other wastes containing hazardous substances – wastes suitable for biological treatment only
19 05	wastes from aerobic treatment of solid wastes
19 05 03	off-specification compost
19 08	wastes from waste water treatment plants not otherwise specified
19 08 01	screenings
19 08 02	waste from desanding
19 08 13*	sludges containing hazardous substances from other treatment of industrial waste water

Table S2.3 Permitted waste types and quantities for treatment in the bioremediation process	
Maximum quantity	In total no more than 89,999 tonnes per annum of hazardous waste and no more than 60,001 tonnes per annum of non-hazardous waste will be accepted for treatment at the site. Waste hazardous properties HP4 to HP7, HP10, HP11 and HP14
Exclusions	Wastes having any of the following characteristics shall not be accepted: Waste containing asbestos
Waste code	Description
05 01 15*	spent filter clays
13	Oil wastes and wastes of liquid fuels (except edible oils, and those in chapters 05, 12 and 19)
13 05	oil/water separator contents
13 05 01*	solids from grit chambers and oil/water separators
13 05 02*	sludges from oil/water separators
13 05 03*	interceptor sludges
13 05 08*	mixtures of wastes from grit chambers and oil/water separators
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 02	wood, glass and plastic
17 02 01	Wood (consisting of untreated woodchips only)
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 03*	soil and stones containing hazardous substances
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 05*	dredging spoil containing hazardous substances
17 05 06	dredging spoil other than those mentioned in 17 05 05
17 05 07*	track ballast containing hazardous substances
17 05 08	track ballast other than those mentioned in 17 05 07
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 02	wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)
19 02 03	premixed wastes composed only of non-hazardous wastes
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 06	sludges from physico/chemical treatment other than those mentioned in 19 02 05
19 02 11*	other wastes containing hazardous substances
19 05	wastes from aerobic treatment of solid wastes
19 05 03	off-specification compost
19 08	wastes from waste water treatment plants not otherwise specified
19 08 01	screenings
19 08 02	waste from desanding

Table S2.4 Permitted waste types and quantities for handpicking of asbestos waste	
Maximum quantity	In total no more than 89,999 tonnes per annum of hazardous waste and no more than 60,000 tonnes per annum of non-hazardous waste will be accepted for treatment at the site.
Exclusions	Wastes having any of the following characteristics shall not be accepted: Asbestos in unbound fibrous form (FREE CHRYSOTILE FIBROUS ASBESTOS IN THE SOIL MUST BE < 0.1% w/w. OTHER FORMS OR MIXED FORMS OF FIBROUS ASBESTOS IN THE SOIL MUST BE <0.01% w/w) Wastes with hazard codes HP1, HP2, HP3, HP9, HP12, HP15
Waste code	Description
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 03*	soil and stones containing hazardous substances (CONTAINS IDENTIFIABLE PIECES OF BONDED ASBESTOS (any particle of a size that can be identified as potentially being asbestos by a competent person if examined by the naked eye))
17 05 04	soil and stones other than those mentioned in 17 05 03 (CONTAINS IDENTIFIABLE PIECES OF BONDED ASBESTOS (any particle of a size that can be identified as potentially being asbestos by a competent person if examined by the naked eye))
17 06	insulation materials and asbestos-containing construction materials
17 06 05*	construction materials containing asbestos (DISCRETE PIECES OF BONDED ASBESTOS WITHIN THE SOIL MATRIX ONLY)

Table S3.3 Process monitoring requirements

Emission point reference or source or description of point of measurement	Parameter	Limit	Monitoring frequency	Monitoring standard or method	Other specifications
Biofilter	Temperature	--	As required	Temperature probe	Biofilter shall be regularly checked and maintained to ensure appropriate temperature and moisture content. Equipment shall be calibrated on a 4 monthly basis or as agreed in writing by the Environment Agency.
	Moisture	--	As required	None specified	
	Thatching/ compaction	--	As required	None specified	
Internal for each biopile batch during bioremediation	Temperature	--	At least weekly	Temperature probe	Monitoring equipment shall be available on site and used as required to maintain aerobic conditions and ensure compliance with this permit. Equipment shall be calibrated on a 4 monthly basis or as agreed in writing by the Environment Agency.
	Moisture	--	As required	None specified	
	pH	--	At least fortnightly	None specified	
	Oxygen	--	At least weekly	None specified	
Air testing within the building (labelled as 'dust shed') for the duration of the asbestos hand picking works and, once pre-operational condition 1 has been given written permission, at all times when the mechanical screening of waste soil is taking place.	Asbestos fibres	0.01 fibres/ml Where total fibre concentration exceeds 0.01 fibres/ml in any sample, that sample must be submitted for electron microscopy to confirm the concentration of asbestos fibres present	During the asbestos hand picking works 1 hour at 8 l/min	In line with M17 monitoring guidance While asbestos is being treated. <ul style="list-style-type: none"> • Pumped sampling • 1m above ground level • Flow rate = 8 litres/ minute • Minimum sample volume = 480 litres • Filter pore size = 0.8-1.2µm Asbestos fibre limit of detection = 0.001 fibres/ml	--

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Biofilter efficiency Parameters as required by condition 3.5.1	Biofilter	Every 12 months	1 January
Asbestos fibres Parameters as required by condition 3.5.1	Air testing within the building (labelled as 'dust shed') during the asbestos hand picking works and, once pre-operational condition 1 has been given written permission, at all times when the mechanical screening of waste soil is taking place. Outside air testing when asbestos contaminated soils are being received, handled and moved within the site Internal Sampling points as detailed in Schedule 5 response dated 29/01/18 and shown on drawing 100993 – Asbestos DWG1 dated January 2018. Outside sampling points as detailed in drawing no.100993 – Asbestos DWG3/Rev1 dated October 2020.	Every 3 months	1 January, 1 April, 1 July, 1 October

Parameter	Units
Bioremediation Plant (treatment)	Tonnes per year
Treatment of hazardous waste (total)	Tonnes per year
Treatment of non-hazardous waste (total)	Tonnes per year

Parameter	Frequency of assessment	Units
Water usage	Annually	tonnes or m ³
Energy usage	Annually	MWh

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“building” means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

“disposal”. Means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2010 No.675 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“hazardous property” has the meaning in Annex III of the Waste Framework Directive.

“hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005 (as amended).

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste, as amended from time to time.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“pests” means Birds, Vermin and Insects.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“recovery” means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

Dunmore, Katie

From: Dunmore, Katie
Sent: 13 September 2021 12:15
To: Andy Stocks
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

☎ [REDACTED]

✉ katie.dunmore@[REDACTED]

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From: Andy Stocks [mailto:AndyStocks@[REDACTED]]
Sent: 13 September 2021 11:06
To: Dunmore, Katie <katie.dunmore@[REDACTED]>
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.

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

Dunmore, Katie

From: Dunmore, Katie
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
National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer

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



8 katie.dunmor

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Dunmore, Katie

From: Dunmore, Katie
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

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

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Dunmore, Katie

From: Dunmore, Katie
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 1st November.

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 katie.dunmore@environment-agency.gov.uk

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Dunmore, Katie

From: Kellie Burston <KellieBurston@...>
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

Dunmore, Katie

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

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

8 katie.dunmore

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From: Kellie Burston [mailto:KellieBurston@environment-agency.gov.uk]
Sent: 05 November 2021 08:53
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: James Cook <james.cook@environment-agency.gov.uk>; Andy Stocks <andy.stocks@environment-agency.gov.uk>; Jon Owens <Jon.Owens@environment-agency.gov.uk>
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

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?

The contents of skips will be taken to a suitably licensed hazardous waste disposal facility. It is likely to be taken to FCC's Winterton Landfill Site which is permitted to accept asbestos waste for disposal.

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.

The Operator has confirmed that oversize compost will be used in the biofilter medium – woodchip will no longer be used due to the impact on air flow and reduced life on the filter medium. The Odour Management Plan will be updated to reflect this change.

I hope this answers your queries, please do not hesitate to get in touch should you require further clarification

Kind Regards
Kellie



Kellie Burston Caulmert Limited

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Dunmore, Katie

From: Kellie Burston <KellieBurston@...>
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 <katie.dunmore@...>
Sent: 08 November 2021 11:04

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 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?

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.

The oversize compost will only be used in the biofilter which is fully contained. The applicant has previously trialled this material in soil treatment and found it unsuitable as it is too large to be fully degraded within 8-12 weeks and may have a residual biochemical methane potential. Therefore this will not be accepted for treatment.

Organic additive such as woodchip maybe added at ~1-3% to clayey soils to break up the cohesive nature of the soils and aid aeration, however usage is not expected to be significant. The smaller size untreated woodchip will be stored next to the receiving batch of soil (see updated plan) so that once the soil is placed on the treatment pad, nutrients (ammonium nitrate) and organic nutrients (woodchip) can then be added to facilitate the biological degradation of the hydrocarbon compounds. Woodchip is only added when the soil is cohesive; so not to every batch. The 30m3 limit is based upon the size of each load that is delivered when required.

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?

The contents of skips will be taken to a suitably licensed hazardous waste disposal facility. It is likely to be taken to FCC's Winterton Landfill Site which is permitted to accept asbestos waste for disposal.

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.

Dunmore, Katie

From: Dunmore, Katie
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

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

8 katie.dunmore@environment-agency.gov.uk

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Dunmore, Katie

From: Kellie Burston <KellieBurston@caulmert.com>
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

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From: Dunmore, Katie <katie.dunmore@caulmert.com>
Sent: 18 November 2021 12:53
To: Kellie Burston <KellieBurston@caulmert.com>
Subject: 19 05 03 as a filter medium

Hi Kellie,

Dunmore, Katie

From: Dunmore, Katie
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 conveyer 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 conveyer 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

Dunmore, Katie

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

8 katie.dunmore [redacted]

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From: Kellie Burston [mailto:KellieBurston@environment.gov.uk]
Sent: 07 January 2022 15:47
To: Dunmore, Katie <katie.dunmore@environment.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

Dunmore, Katie

From: Kellie Burston <KellieBurston@caulmertyou.com>
Sent: 07 January 2022 15:47
To: Dunmore, Katie
Subject: RE: EWC's treated for disposal

Hi Katie,

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Kind Regards
Kellie



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Senior Environmental Consultant

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From: Dunmore, Katie <katie.dunmore@caulmertyou.com>
Sent: 07 January 2022 14:50
To: Kellie Burston <KellieBurston@caulmertyou.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.

Dunmore, Katie

From: Dunmore, Katie
Sent: 12 January 2022 10:42
To: Kellie Burston
Subject: Daneshill STF drainage

Hi Kellie,

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?

Kind regards

Katie Dunmore
Permitting Officer
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✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

████████████████████
8 katie.dunmor████████████████████

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Dunmore, Katie

From: Kellie Burston <KellieBurston@...>
Sent: 20 January 2022 11:14
To: Dunmore, Katie
Subject: RE: EWC's treated for disposal

Follow Up Flag: Follow up
Flag Status: Flagged

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@...>
Sent: 07 January 2022 16:22
To: Kellie Burston <KellieBurston@...>
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

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From: Dunmore, Katie <katie.dunmore@[REDACTED]>
Sent: 07 January 2022 14:50
To: Kellie Burston <KellieBurston@[REDACTED]>
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
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✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

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Dunmore, Katie

From: Dunmore, Katie
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
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✉ Environment Agency, Horizon House, Deane Road, Bristol, BS1 5AH

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From: Dunmore, Katie
Sent: 31 January 2022 09:27
To: Kellie Burston <KellieBurston@>
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, Deane Road, Bristol, BS1 5AH

8 katie.dunmore@
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From: Kellie Burston [mailto:KellieBurston@>
Sent: 20 January 2022 11:14
To: Dunmore, Katie <katie.dunmore@>
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

Kellie Burston

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Senior Environmental Consultant

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From: Dunmore, Katie <katie.dunmore@caulmert.com>

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

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Dunmore, Katie

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

Follow Up Flag: Follow up
Flag Status: Flagged

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@...>
Sent: 31 January 2022 10:09
To: Kellie Burston <KellieBurston@...>
Subject: RE: EWC's treated for disposal

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Kind regards

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19 12 11*

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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@...>
Sent: 07 January 2022 16:22
To: Kellie Burston <KellieBurston@...>
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
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Please clarify how these could be considered suitable for recovery at the landfill.

Kind regards

Katie Dunmore
Permitting Officer
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Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

8 katie.dunmore@...

To: Kellie Burston <KellieBurston@

Subject: EWC's treated for disposal

Hi Kellie,

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


8 katie.dunmore@k

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Dunmore, Katie

From: Kellie Burston <KellieBurston@...>
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

Dunmore, Katie

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

8 katie.dunmore@environment-agency.gov.uk

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From: Kellie Burston [mailto:KellieBurston@environment-agency.gov.uk]

Sent: 22 February 2022 16:06

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

Subject: RE: EWC's treated for disposal

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

Dunmore, Katie

From: Andy Stocks <AndyStocks@caulmert.com>
Sent: 27 April 2022 10:26
To: Dunmore, Katie
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 Director of Environment AndyStocks@caulmert.com www.caulmert.com Nottingham Office • Strelley Hall, Main Street • Strelley, Nottingham • NG8 6PE • United Kingdom	Caulmert Limited Mobile: 0115 928136 Direct: 0115 928137 Phone: 0115 928138
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Dunmore, Katie

From: Dunmore, Katie
Sent: 05 May 2022 09:33
To: Andy Stocks
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

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

8 katie.dunmore@ea.gov.uk

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From: Andy Stocks <AndyStocks@caulmert.com>
Sent: 27 April 2022 10:26
To: Dunmore, Katie <katie.dunmore@ea.gov.uk>
Subject: Daneshill Landfill Site. EPR/NP3538MF/V009

Hi Katie

I was wondering how the determination of this application is progressing as it's 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



Dunmore, Katie

From: Dunmore, Katie
Sent: 21 June 2022 16:50
To: Andy Stocks
Subject: Daneshill Landfill permit variation for operator review
Attachments: LIT 12001 - Notice of variation and consolidation single permit.pdf

Hi Andy,

As discussed, I have attached the permit draft for operator review. The highlighted sections have been added or amended as part of the variation.

Could you provide a basic infrastructure plan with the biofilter emission point labelled for inclusion within the permit please.

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 katie.dunmore

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Dunmore, Katie

From: Andy Stocks <AndyStocks@caulm[REDACTED]>
Sent: 21 June 2022 17:54
To: Dunmore, Katie
Subject: RE: Daneshill Landfill permit variation for operator review

Hi Katie,

FCC have asked whether it would be possible to have a discussion with you and the EA Technical Lead given they are faced with a refusal for the asbestos activity? They believe this would help everyone to understand your decision-making process better which may potentially avoid an appeal.

Regards

Andy



Andy Stocks Director of Environment AndyStocks@caulm[REDACTED] www.caulmert.com Nottingham Office • Strelley Hall, Main Street • Strelley, Nottingham • NG8 6PE • United Kingdom	Caulmert Limited Mobile: [REDACTED] Direct: [REDACTED] Phone: 01773 245133
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From: Dunmore, Katie <katie.dunmore@caulm[REDACTED]>
Sent: 21 June 2022 16:50
To: Andy Stocks <AndyStocks@caulm[REDACTED]>
Subject: Daneshill Landfill permit variation for operator review

Hi Andy,

As discussed, I have attached the permit draft for operator review. The highlighted sections have been added or amended as part of the variation.

Dunmore, Katie

From: Andy Stocks <AndyStocks@caulmert.com>
Sent: 08 July 2022 15:17
To: Dunmore, Katie
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
Director of Environment	Mobile: [REDACTED]
AndyStocks@caulmert.com	Direct: [REDACTED]
www.caulmert.com	Phone: [REDACTED]
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From: Dunmore, Katie <katie.dunmore@caulmert.com>
Sent: 04 July 2022 11:53
To: Andy Stocks <AndyStocks@caulmert.com>
Subject: FCC Daneshill

Hi Andy,

Dunmore, Katie

From: Dunmore, Katie
Sent: 24 August 2022 14:44
To: Andy Stocks
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 5th 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

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

m [REDACTED]

8 katie.dunmore [REDACTED]

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From: Andy Stocks <AndyStocks [REDACTED]>
Sent: 18 July 2022 10:25
To: Dunmore, Katie <katie.dunmore [REDACTED]>
Subject: RE: FCC Daneshill

Thanks Katie

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

Andy

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