

Notice of request for more information

The Environmental Permitting (England & Wales) Regulations 2016

Company Secretary

Waste Recycling Group (Central) Limited

3 Sidings Court
White Rose Way
Doncaster
DN4 5NU

Application number: EPR/HP3632RP/V005

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 12/01/2024.

Send the information to either the email or postal address below by 14/02/2024. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused.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: Daniel.kirk@environment-agency.gov.uk

Postal address:

Permitting Support, NPS Sheffield
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Name	Date
Daniel Kirk	23/01/2024

Authorised on behalf of the Environment Agency

Notes

These notes do not form part of this notice.

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

Schedule

Mechanical screening of soil containing asbestos

You have applied to remove preoperational condition (1) from the permit in order to allow the site to use a mechanical screener for the pre-screening of soils containing asbestos. In order to demonstrate that the pre-screening of soils containing asbestos will be undertaken in line with best available techniques and without significant risk to the environment we will require the following additional information.

1) Clarification of proposal for treatment of waste containing asbestos

Your application document 'Permit Variation Application Report No. K0182-BLA-R-ENV-R00001 Page 3' outlines a series of conversations with the Environment Agency and the proposals submitted to our regulatory team with the aim of discharging preoperational condition (1) in Table S1.3. The last submission of proposals to the Environment Agency's Local Regulatory team included:

"Mechanical screen within a fully enclosed building with air extraction system with all emissions abated via a HEPA filter discharging external to the building".

a) Please confirm whether this proposal for enclosure within a building with abatement is the approach you intend to take in line with BAT conclusion point BAT 14 once the pre-operation condition (1) is removed.

b) Alternatively, please confirm once the pre-operation condition (1) is removed, whether the intention is to provide other mitigation techniques (other than enclosure within a building) in line with BAT conclusion point BAT 14 to manage the pre-screening process.

c) If enclosure is not proposed, please provide an explanation as to why this approach has been taken given that the handpicking of asbestos contaminated waste is undertaken within an enclosure.

2) Waste acceptance criteria for waste containing asbestos

Your application document 'Asbestos Emissions Report Number: RR/AER/001 Page 3 Section 2.2.2' outlines that this site is to employ strict waste acceptance criteria that will only allow a certain specification of asbestos content. This is to prevent the acceptance of waste that could release unacceptable asbestos fibres during processing.

The current criteria are summarised as:

- 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))
- 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)

The justification for this method is currently not detailed enough to demonstrate that the specification and specific methods you will implement are strict enough to ensure the site will effectively identify and only accept wastes which have a significantly low risk and are unlikely to result in asbestos emissions.

In addition, there needs to be further evidence to show a clear correlation between your proposed acceptance techniques and a direct reduction in emissions. It must be clearly demonstrated that any asbestos contamination will be in a state that would not lead to 'asbestos emission release' as a result of agitation during processing.

Please submit the following information to demonstrate strict and effective waste pre-acceptance and acceptance processes will be in place which can directly control and prevent the release of asbestos emissions from soils containing asbestos when they are subject to mechanical treatment.

a) Submit a detailed specification of the waste soils containing asbestos that you intend to accept for processing.

b) Submit a detailed specification of the waste soils containing asbestos that you will not accept on site because you consider them untreatable and likely to result in unacceptable emissions.

c) Describe the key methods you will implement to ensure that waste soil containing asbestos accepted meets the correct specification.

d) Provide evidence to demonstrate your proposed acceptance methods are shown to have a direct impact on preventing the release of asbestos emissions when waste soils containing asbestos are subject to mechanical treatment.

e) Please propose specific descriptions for the waste codes you intend to accept for pre-screening of asbestos soils. These must exactly describe the specific level of contamination wastes subject to mechanical screening will be restricted to.

3) Implementing the requirements of BAT 14 for fugitive asbestos emissions

In addition to the waste acceptance discussed above you have outlined in document 'Technical Standards and BAT Assessment Report No. K0182-BLP-R-ENV-00004 BAT 14 page 34/35' other measures you will implement to be meet the requirements of BAT 14.

a) Moisture (BAT 14 comment 2)

Your BAT assessment states:

"Only soils with a moisture content >15% are to be pre-screened. Generally, soil moisture content is ~20% or above on received soils. Soils are dampened down where required to ensure moisture content is kept at the optimal level of 30%. This further limits any potential for liberation of fibres through handling/treatment"

Please describe and justify the control and monitoring methods you will implement to ensure an appropriate level of moisture content is maintained to allow optimum treatment as well as optimum level of emission suppression.

This must include:

- i) Justification for the proposed percentage moisture contents and why the stated percentages will ensure optimum emissions suppression.**
- ii) A description of the monitoring you will implement to ensure an optimum moisture content is maintained.**
- iii) The stages in the process this moisture monitoring is undertaken**
- iv) A description of the moisture control measures (e.g. dampening) and drawings showing the locations of key measures (such as spray positions).**
- v) Evidence that a suitable supply of water is available.**
- vi) Contingency measures to be taken if moisture control deviates from the optimum range and cannot be corrected immediately.**

b) Enclosure (BAT 14 comment 3)

You have stated that the screener will be in building and have given examples of covered screeners. The Asbestos Emissions Report Number: RR/AER/001 then provides images of screener will the belt areas covered.

- i) Please confirm whether or not you intend to implement covers on the screener belt if the screening process will be in an enclosed building.**
- ii) If the process will not be within an enclosure or within a sealed building, please confirm whether covers are to be applied to the screening belt to minimise fugitive emissions.**

iii) Please provide a description of belt covers applied and confirm where they will be applied.

iv) Please describe any local abatement techniques you intend to implement.

c) Cleaning and maintenance (BAT 14 comment 7)

Your BAT assessment states that there will be regular cleaning of all operational areas, plant and equipment and in general the application confirms there will be good housekeeping. This is however not detailed enough to describe how you will specifically manage any build-up of waste containing asbestos from operation of the mechanical screener.

Please provide a detailed description of:

i) How you will identify building up of waste containing asbestos

ii) The specific cleaning measures you will implement

iii) The frequency with which cleaning will be undertaken.

4) Monitoring – specific to Mechanical treatment of soils containing asbestos

The application is to remove the preoperational condition (1) to allow the mechanical screening of soils containing asbestos. As a result further information is required to describe the monitoring you will undertake as a removal of the preoperational condition will change the way the emissions from the processes are intended to be mitigated and channelled.

You have stated in section 6.2.2 of the Technical Standards and BAT Assessment Report No. K0182-BLP-R-ENV-00004 that Asbestos air monitoring is currently undertaken at 4 locations at the Site in accordance with Table S3.3 of the Permit and the data assessed against the method detection limit of 0.01 fibres/ml (HSE clearance limit). This monitoring is however linked in the permit to the completion of the preoperational condition on the agreement of enclosure.

In the event the preoperational condition was removed to allow pre-screening of soil containing asbestos, **please provide a description of the monitoring you will undertake to ensure your waste acceptance and mitigation controls are effective.**

This must include:

i) The location of monitoring

ii) The frequency of monitoring

iii) The standard for monitoring (based on the unit being enclosed or not enclosed)

iv) Justification as to how this monitoring programme fully takes into account any potential asbestos emissions from the mechanical screening process and the fact that it is either enclosed or not enclosed.

5) Practical trial for treatment of asbestos via mechanical screening

To demonstrate that the proposals you intend to implement are effective in practice, a trial under controlled conditions will need to be undertaken to confirm the conclusions outlined in your application. This will involve as part of your variation application the submission of a trial proposal for agreement with the Environment Agency. Once the trial proposal is agreed, in the event of permit variation issue, an improvement condition(s) will be included requiring you to undertake the trial as agreed and demonstrate the operational results display the outcomes as expected in the permit application and trial proposal.

Please submit a plan which includes proposals for an operation trial.

The trial proposals must include:

- Proposals to monitor asbestos and dust emissions from the treatment process within a controlled environment (enclosed and channelled to an emission point/s so the volume of air, asbestos and dust can be accurately sampled and quantified).
- Proposals for ambient air monitoring for asbestos and dust at the site boundary (including accounting for weather conditions during monitoring)
- Details of the proposed frequency, number, duration of measurements and location of air emissions monitoring.
- A demonstration of both the typical and maximum operating conditions under which the monitoring will be undertaken to ensure it is both representative and includes worse case. This must include mechanical screening processing rates, total tonnes processed, tonnes of fines produced, times of operation, percentage contents of bonded (ACM) and free asbestos in soils, soil grades processed, soil moisture content.
- Representative sampling/ characterisation of the input waste materials to be processed: proportions of ACM and minerals - sand/clay/rubble fractions within the waste being treated which may affect the emission levels or outputs.
- A representative sampling programme for all output materials – oversize, mid size and fine fractions to demonstrate that the treatment process is as expected and not increasing the presence of fibres or fragments into any of the output fractions.
- Proposals for mitigation and abatement measures including the locations in which it is applied (e.g waste acceptance, storage, transfer and treatment)
- Background monitoring prior to the trial to establish baseline levels (including weather conditions during monitoring)
- Details of the proposed standards for the monitoring/sampling and accredited laboratories to be used.