

Grange, Adam

From: Dunmore, Katie
Sent: 13 September 2021 13:06
To: Hadley, Richard
Subject: Asbestos screening pre-op at Rowley Regis

Hi Richard,

I understand you are dealing with a pre-op for Rowley Regis STF operating a screener for asbestos soils?

I currently have an application from FCC to operate a similar facility at Daneshill Landfill in Nottinghamshire. They propose to pre-screen asbestos soils before they go through a picking station. The application is way off the mark at the minute. FCC propose the use of a 3 way screen before tipping and movement through a basic picking station. All stockpiling and soil handling is outside.

My application is currently schedule 5 and I've been plain that a 3 way screen with no mitigation isn't appropriate. The applicant however has confirmed they won't respond to the screening elements of the Schedule 5 until the outcome of your pre-op is resolved. Could you give me an idea of what's currently happening with this? I'm just wondering how to proceed with my application. I don't want to hold things indefinitely. FCC have stated if they can't pre- screen the facility as a whole won't be viable. I had suggested we just look at the bioremediation and asbestos picking only.

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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Grange, Adam

To: Bischer, Mel
Subject: FW: Asbestos soil treatment activities proposed at Daneshill Landfill Site. EPR/NP3538MF/V009

Hi Mel,

Another example email for FCC. This follows a phone conversation and was underpinning the meeting Claire was to have with FCC. I don't think I could have been more plain we needed more information. I have RFI after RFI to their consultant in a similar vain. Nothing significant was provided. I do believe they offered to enclose the conveyer but the soil was then ejected into an uncovered stockpile.

I haven't at any point advised what they should do, certainly not build a building. If I remember rightly the site is an old munitions site and there has been comment that a building may not be appropriate.


I stopped asking questions in the end and concentrated on the bioremediation side of things. I don't think there was anything more I could explain or expand upon.

They did ask for a meeting, at the time I was in touch with Warrington who were dealing with the Rowley Regis screen. Meetings were being requested but there was a general feeling that everything had been said, arguing and they were sucking up so much time when everything had been said, plus they were meeting with Claire.

Kind regards

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From: Dunmore, Katie
Sent: 25 November 2021 12:23
To: [REDACTED]
Subject: Asbestos soil treatment activities proposed at Daneshill Landfill Site. EPR/NP3538MF/V009

Hi [REDACTED]

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 conveyor and be formed into further stockpiles.

Q.16 required an explanation of any emissions abatement within the picking booth and if not an explanation how airborne fibres are captured and contained. We further stated:

Reason - We have significant concerns that the asbestos soil storage, transfer and treatment activities as described do not meet BAT. There appears to be no specific mitigation or abatement proposed with stockpiles described as being deposited, screened and transferred to a picking station with doors and windows, via conveyors and then further deposited in open stockpiles.

The Emissions Management Plan states "asbestos fibres are not generated on site above the detection limit so no abatement system is required". We disagree, screening and dropping from height will agitate and may break asbestos materials and lead to release of fibres. Dust suppression and "wetting solution" alone is not considered sufficient mitigation. You must demonstrate through detailed working procedures how asbestos soils are stored, treated and handled to ensure the containment and collection of diffuse emissions. As stated in BAT we would expect techniques such as;

- *Storage and treatment in enclosed buildings and/or equipment*
- *Maintaining enclosed equipment under adequate pressure*
- *Collecting and directing emissions to an adequate abatement system*

Your response directed us to discussions being held with the Environment Agency regarding activities on another site.

Q.14 requested the operator describe how waste would be transferred to the post treatment storage location. You answered that soil wouldn't pose a risk once validated and that normal dust suppression would be applied. We therefore conclude stockpiles would remain uncovered.

We consider the proposed activities do pose a risk of generating airborne asbestos fibres. Degraded asbestos pieces contained within the soil may pose a risk of realising fibres which will be compounded by handling and treatment. No containment measures are proposed.

No information has been provided regarding the asbestos screening activity which is stated within the application as pre-screening prior to handpicking using a three-way screener. Limited detail is provided on abatement or containment and the operator did not answer the questions within the Schedule 5, instead referencing asbestos monitoring results from Edwin Richards Quarry.

The operator must demonstrate the use of BAT for the application site and that all necessary operational controls will be in place to mitigate and capture emissions. That has not been demonstrated at Daneshill STF and for that reason

we are confirming that based on the information provided to date the asbestos storage and treatment activity cannot be permitted. Therefore no further assessment around this issue would be useful at this time.

I've received your request for a meeting with myself and Chris Hall to understand how the asbestos activity can be taken forward. Please take this email as a direction on this. In order to take the asbestos activity forward the operator must reconsider the relevant sections of the Schedule 5 notice highlighted above explaining how BAT will be achieved for the asbestos activity at this location. We can discuss a suitable timeframe. Alternatively we suggest the operator withdraws the proposals for the asbestos soil treatment activity.

I understand a meeting is to be held between the operator and their account manager Claire Roberts. I have flagged our concerns for this application with Claire and I believe this will be raised at the meeting.

In the mean time I'll await a decision as to whether the operator chooses to withdraw or confirm if there is further scope to provide the information requested within a reasonable timeframe.

Kind regards

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

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Grange, Adam

From: Dunmore, Katie
Sent: 08 October 2021 13:21
To: Hall, Chris
Cc: Hadley, Richard
Subject: Asbestos soil screening and hand picking st Daneshill Landfill site

Hi Chris,

I'm assessing a STF application for FCC Recycling at the above site. Along with bioremediation they want to carry out screening and handpicking of asbestos contaminated soils.

I've just received further information via Schedule 5 but I still consider the asbestos activities to be unsuitable. All activities are carried out in the open including the use of an unabated 3 way screener. Soil stockpiles move on open conveyors into a portacabin type picking station. There are plenty of drops with no specific "gentle" handling techniques. Stockpiles formed with loading shovels etc. The only means of emissions abatement is water and surfactant sprays.

FCC's response leans heavily on emissions monitoring carried out at Rowley Regis which states that dust sampling without suppression shows results below 0.0005f/ml or 0.01f/ml. Their response can be summarise to - they don't need mitigation such as enclosed buildings/equipment or specific handling techniques because fibres will not be present as evidenced by the monitoring appended to their response.

I don't quite how to take this response as I had extensive discussions with their consultant when the schedule 5 was issued. I stated that we had significant concerns (screening aside) about dropping from height, agitation from conveyors etc and the potential to break asbestos cement. Where would we stand with this if they consider they are providing evidence operations do not lead to fibre release?

Similarly they had dropped the amount of monitoring hear compared to other sites. There's no personal operative monitoring proposed with only two fibre monitoring points in the vicinity of the screen and picking station. Given this is outside and open to all weathers could this ever give reliable results?

I have spoken to Richard briefly regarding the screener pre-op at Rowley Regis. FCC won't provide any further information to me on my screener until discussions have concluded with the Rowley Regis pre-op. I understood it had been left that we weren't discussing it, that they needed to comply or they can't have it. Have there been further developments with this?

I had initially said I would refuse the screener on my site on my site if they didn't respond to the Schedule 5 but FCC seem very set that we are about to agree something at Rowley Regis. Any info would therefore be greatly received.

Kind regards

Katie Dunmore
Permitting Officer
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Grange, Adam

From: Dunmore, Katie
Sent: 13 July 2021 15:04
To: Timmins, Keli
Subject: RE: EMD-225218 Various Due back 23/07/2021

Hi Keli,

I spoke to Mark Candlin in Customer and Engagement about this last week. I believe he too is providing a response.

There's no immediate plans to make this a HPI although I haven't discussed it in detail yet with the local officer.

The application isn't duly made as yet but when this moves forward locals will be able to respond to the advert on Gov.UK (it's a substantial variation). I'll also be consulting relevant consultees. I'm hoping this should be sufficient.

Kind regards

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From: Timmins, Keli
Sent: 13 July 2021 13:00
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: FW: EMD-225218 Various Due back 23/07/2021

Hiya Katie

I believe the information request below has to do with EA/EPR/NP3538MF/V009 – that's Daneshill Landfill Site.

Are you able to respond regarding the enquirer's concerns about this application being of high public interest and the opportunity for the public to contribute to the consultation? If you write a response I can sort out the administrative side and get it to the right people including the requestor.

Thanks!
Keli

From: National Permitting Service Feedback
Sent: 13 July 2021 09:52
To: NPS Centralised Services Team <NPSCentralisedServicesTeam@environment-agency.gov.uk>
Cc: EMDenquiries <EMDenquiries@environment-agency.gov.uk>
Subject: FW: EMD-225218 Various Due back 23/07/2021

Hey

One for you guys, if you want me to pick up just let me know ☺

Jess

From: EMDenquiries
Sent: 13 July 2021 09:35
To: RSOrequests-eastmids <RSOrequests-eastmids@environment-agency.gov.uk>; Planning, Lower Trent <planning.trentside@environment-agency.gov.uk>; National Permitting Service Feedback <NPSFeedback@environment-agency.gov.uk>
Subject: EMD-225218 Various Due back 23/07/2021

Please find below/attached a **FOI/EIR**, please note that we have 20 working days in which to respond to the customer.

| | |
|----------------------|---|
| EMD:- | 225218 |
| Reply Due:- Day 8 | 23/07/2021 |
| 20th day due:- | 06/08/2021 |
| Site:- | Enquiries regarding FCC - Daneshill landfill, Lound, Retford |
| NGR:- | |
| Additional Comments | If there are any issues please notify the C&E team. <i>Additional comments</i> <i>If you require a hard drive for this request please notify the C&E team for them to contact the customer.</i> |

Please could we also ask that when replying from a generic email address, you provide your team name/auto signature. This will prevent any confusion arising when a number of functions are involved in one particular enquiry.

Send your response to: EMDenquiries@environment-agency.gov.uk

From the C&E Team

From: [REDACTED]
Sent: 07 July 2021 09:51
To: Correspondence, EMD <EMDcorrespondence@environment-agency.gov.uk>
Subject: Permit application FCC - Daneshill landfill, Lound, Retford

Good morning

I am enquiring about a current Environmental Permit application for a hazardous soil treatment facility at Daneshill landfill site, Lound , near Retford. I am handling the planning application here at Notts County Council and due to complexities the application has had to be deferred in order to undertake an Environmental Impact Assessment. Meanwhile the applicant pressed on with the Permitting side and I understand that their Permit application is now valid or 'duly made'.

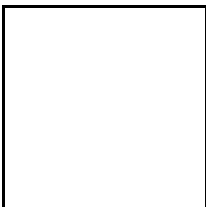
I have since had several enquiries from our local Councillors as to whether the public are able to view and comment on the Permit application. I cannot see it has been listed on your consultation website pages and I am unclear as to whether it will trigger a public consultation or not. We raised this query with you in a letter on the 8th February (once the permit application had been lodged) in the name of our then Committee Chair. The letter (copy attached) explained that the planning application had created a high level of public interest locally, and that complex issues raised were matters which should be dealt with under the Permit process rather than planning and therefore a consultation was recommended.

Could we now seek some clarity please on the arrangements with the Permit application, whether there will be a formal consultation window or not, and if not, can local people still write in their comments? Thank you.

With kind regards


Principal Planning Officer
Nottinghamshire County Council

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Grange, Adam

From: Dunmore, Katie
Sent: 09 February 2022 17:02
To: Wall, Clive
Subject: Bio filter operation at Edwin Richards Quarry

Hi Clive,

I believe you are the local officer for the above site? I was wondering if you had 5mins for a quick chat regarding operations at the site.

I'm a PO dealing with an application from FCC to undertake bioremediation and asbestos picking/screening at Daneshill Landfill in Nottinghamshire. The applicant makes reference to operations at Edwin Richards as a template for their proposed new operation and has also provided emissions data from Edwin Richards.

The issue I have is FCC want to use waste compost EWC 19 05 03 as a bio filter medium. We have major concerns about this and it not something we would consider BAT. FCC however have confirmed they use this medium at Edwin Richards and several other sites. They have provided monitoring data from Edwin Richards which confirms VOC PCs set against human health standard are negligible. They state there are no issues with odour at Edwin Richards. Is this the case?

There are many reasons E&B are unhappy permitting waste materials as filter media but it's also harder to push back if Edwin Richards is ticking along nicely. Could you let me know if there are any concerns at your site?

Kind regards

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

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mob: 07584 369561
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Grange, Adam

From: Candlin, Mark
Sent: 14 July 2021 10:28
To: Timmins, Keli; EMDenquiries; Dunmore, Katie
Cc: RSOrequests-eastmids; NPS Centralised Services Team; National Permitting Service Feedback; Planning, Lower Trent
Subject: RE: EMD-225218 Various Due back 23/07/2021

Hi all,

Apologies for the confusion, this is a duplicate request and therefore does not enquire any further responses, Katie and I have spoken and the issues is in hand.

Regards

Mark

From: Timmins, Keli
Sent: 14 July 2021 08:38
To: EMDenquiries <EMDenquiries@environment-agency.gov.uk>
Cc: Candlin, Mark <mark.candlin@environment-agency.gov.uk>
Subject: FW: EMD-225218 Various Due back 23/07/2021

Hiya
I have sought a response from the permitting officer, Katie Dunmore (below). She mentioned that Mark Candlin might be writing a response to this customer, too (?), so it might be an idea to check just in case we are duplicating effort (although I am not sure who sent us the request from EMD Enquiries,...it may well have been Mark!) ☺

I hope this is helpful but please let me know if you should need anything further.

Many thanks,

Keli Timmins

Technical Officer, National Permitting Service

Environment Agency | Richard Fairclough House, Knutsford Road, Warrington, WA4 1HT

keli.timmins@environment-agency.gov.uk

External: 02030 250 747 | Jabber: 50747



From: Dunmore, Katie
Sent: 13 July 2021 15:04
To: Timmins, Keli <keli.timmins@environment-agency.gov.uk>
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Hi Keli,

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From the C&E Team

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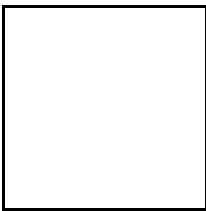
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Grange, Adam

From: Dunmore, Katie
Sent: 16 May 2022 16:12
To: Raynes, Graham
Subject: Biofilter monitoring at Daneshill Landfill

Graham,

I've revised the FCC soil treatment facility permit with your comments, many thanks for these. I'd just like to check I'm on the right track with the biofilter monitoring which I think may be subject to scrutiny.

I've included TVOC and speciated VOC as you suggest from the healthcare template. Why do we use the healthcare template? I see the limit is the same as that detailed for physicochemical treatment of waste with calorific value.. Is it adapted from that?

I've also include NH3 with the limit 20mg/m3. Odour is also mentioned but do we not include as adding NH3. H2S is also detailed as a requirement however is this unlikely to arise from the bioremediation process?

| | | | | | | |
|---|---|---------------|----------------------|---|----------------|--------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | 30 mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 |
| | NH ₃ | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |
| | Dust | | 5mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |

Kind regards

Katie Dunmore
Permitting Officer
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Grange, Adam

From: Bischer, Mel
Sent: 28 July 2022 17:09
To: Dunmore, Katie
Subject: RE: FCC Feedback

Thanks for sharing Katie. Did you get any feedback from Claire on this?

Mel

Mel Bischer CMgr MCMI
Principal Permitting Team Leader, National Permitting Service
Environment Agency | Horizon House, Deanery Road, Bristol BS1 5AH

melanie.bischer@environment-agency.gov.uk

Mobile: 07771 387706

Say my name (phonetic spelling): *Mel Bih-shuh*

Pronouns: she/her ([why is this here?](#))

[No need to thank me](#)

Working days: Monday to Friday



Incident management role: (Duty) National Base Controller



BAME
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Women's Network

Enabling, equipping and encouraging women
to reach their full potential in the workplace.



I've pledged to try and make
the most of my lunch break to
help boost my wellbeing.

#loveyourlunchbreak

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

Sent: 28 July 2022 09:57

To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Subject: RE: FCC Feedback

Hi Mel,

Please see below email to Claire Roberts, FCCs account manager. It reflect on the determination difficulties we had with FCC and their consultants and their unwillingness to provide information for this determination. I believe there were other – hence why Claire was meeting with them.

FCC had ample time to provide the necessary information for the asbestos determination and were told of the potential consequences. I think this should have some bearing on whether we decide to revisit the application at this time.

Kind regards

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

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mob: 07584 369561
📧 katie.dunmore@environment-agency.gov.uk

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From: Dunmore, Katie
Sent: 19 November 2021 11:55
To: Roberts, Claire <claire.v.roberts@environment-agency.gov.uk>
Subject: FW: FCC Feedback

Hi Claire,

Below are my comments to Sam.

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
📧 katie.dunmore@environment-agency.gov.uk

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From: Dunmore, Katie
Sent: 19 November 2021 11:41
To: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>
Subject: RE: FCC Feedback

Hi Sam,

Daneshill Landfill, EPR/NP3538MF/V009 is FCC. They have applied to operate a soil treatment facility within the boundary of the existing landfill. They propose to treat hydrocarbon impacted wastes by bioremediation and treat asbestos contaminated soils by mechanical screening and handpicking. These soils may then go onto bioremediation. Treated soils will be used for restoration at the landfill.

It would be really useful if Claire could discuss with FCC the issues we have with permitting this site and ultimately that they are talking themselves into a partial refusal. I don't have a contact at FCC, I've dealt with their consultants [REDACTED] and [REDACTED] at Caulment. I'm not sure if the issues lie with them or the operator but from my conversations with both [REDACTED] and [REDACTED] they do not recognise the potential risks from the activities and when I ask for clarification on a point they don't know the answers, referring back to FCC and taking weeks to respond.

I've tried to keep it brief but there are quite a few issues. FCC are experienced in the activities applied for. Their application however did not meet BAT, the documents were extremely vague and a 46 point Schedule 5 was required from the off. I explained our requirements in detail to their consultants. The Schedule 5 also contained explanations.

The Schedule 5 was not satisfied. They answered the questions but detail was not provided. I have issued several RFIs trying to tease this information out. Fundamentally the major issue is that rather than providing an explanation of how activities meet BAT supported with explanations they dismiss the risks, provide no mitigation in terms of contained stockpiles, covered equipment, sealed buildings (or whatever they see fit). They propose limited monitoring so there will also be no real assurance that activities are not giving rise to emissions.

Their responses in many instances refute our concerns by referencing other sites particularly Edwin Richards Quarry where they state asbestos fibre monitoring has never picked up an issue. For instance I asked how the water system would capture asbestos fibre, they stated - *Water monitoring from asbestos processes has not detected fibres ...no abatement in effluent is required.*

When asked about containing and capturing emissions from picking operations. They referenced monitoring at Edwin Richards again whilst offering only normal dust suppression as mitigation here.

They make blanket statements that the soils do not pose a risk to human health when compliance testing has been carried out.

We can't permit on assurances that they haven't had issues in the past. It should be noted that activities at Edwin Richards are fully enclosed within a sealed building with tight monitoring. There is no risk to the local environment or community.

We accept that compliance sampling will show the soils are non-hazardous for asbestos. We however consider there is significant risk that treatment by handling, dropping, screening, agitating soils containing cement bounded asbestos (which we consider friable when weathered –they don't) may release fibres into the soil and air. This is fundamentally not addressed in the application.

On a separate note. FCC are currently refusing to provide any response to the Schedule 5 question regarding the asbestos soil screening activity whilst they dispute a pre-op at Edwin Richards. As far as I'm aware there is no formal appeal. My understanding here is that if they want to screen at Edwin Richards they must undertake this in an entirely sealed machine with HEPA or similar filtration. They agreed with the pre-op but are now saying monitoring of the screen provides sufficient data to prove there is no risk.

Considering FCC know our requirements for these activities the fact they have put in such a poor application and provide challenging responses is frustrating. Andy Stocks dismissed my concerns in the early stages likening the works to mobile plant. They are talking themselves into a refusal.

FCC have really shot themselves in the foot constantly referencing Edwin Richards. As you know we had 66 objections from our consultation. Many of which have read the Edwin Richards permit and applications docs and also question why this location is not similarly protected.

A number of the local comments raised historic issues with the site in terms of unsheeted vehicles access the site, waste tipped on roads, generally not being a good neighbour. This coupled with FCCs attitude gives us no leeway to give them any in terms of trying something slightly different because we have no confidence they respect the risks.

I did speak to [REDACTED] yesterday and was quite frank, raising the comments from residents and confirmed the asbestos activity would be refused based on the information currently submitted. I mentioned a further Schedule 5 may be issued but I'm not sure what more I could ask.

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

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From: Haddock, Samantha
Sent: 17 November 2021 08:58
To: Alexander, Mike <mike.alexander@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Grills, Rachael <rachael.grills@environment-agency.gov.uk>; Haines, Thomas <Thomas.Haines@environment-agency.gov.uk>; Lythgo, Kirstie <Kirstie.Lythgo@environment-agency.gov.uk>; Miller, Stuart <Stuart.Miller1@environment-agency.gov.uk>; Morris, Chris <chris.morris@environment-agency.gov.uk>; Pople, Emily <emily.pople@environment-agency.gov.uk>; Smith, Jennie <Jennie.Smith@environment-agency.gov.uk>; Barker, Paul <paul.e.barker@environment-agency.gov.uk>; DiStefano, Francesco <Francesco.DiStefano@environment-agency.gov.uk>; Giles, Ruth <Ruth.Giles@environment-agency.gov.uk>; Hann, Louise <louise.hann@environment-agency.gov.uk>; Hunt, Simon <Simon.Hunt@environment-agency.gov.uk>; Palmer, Clara <Clara.Palmer@environment-agency.gov.uk>; Pemberton, Emma <emma.pemberton01@environment-agency.gov.uk>; Tearle, Jess <Jess.Tearle@environment-agency.gov.uk>; Walker, Jake <Jake.Walker@environment-agency.gov.uk>; Wycherley, Miranda <miranda.wycherley@environment-agency.gov.uk>
Subject: FCC Feedback

Morning all

I know a number of people have FCC applications on at the moment. Claire Robert has an account manager meeting with them on the 1st of December so if you have any feedback, positive or negative, or issues you would like her to raise please provide me with:

- Permit number
- Site name
- contact at FCC
- Detail
- outcome needed (if any)

Please send these to me by Wednesday 24th November

Thanks

Samantha Haddock

Permitting Team Leader (Bristol Installations)

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

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

Please note I don't work on Thursdays.

samantha.haddock@environment-agency.gov.uk

External: 02030 254710

Mobile: 07796997145

Grange, Adam

From: Turner, Martin
Sent: 08 October 2021 10:16
To: Dunmore, Katie
Cc: Smith, Heather
Subject: Daneshill asbestos treatment 8 Oct 2021
Attachments: Daneshill asbestos treatment 8 Oct 2021.docx

Hi Katie

I hope you are well

Thanks for your message - sorry for my delayed response as I have been off work – see attached - can you confirm whether there has been MP / Parish Council interest so I can complete the form.

Thanks

Martin

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford,
Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



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Grange, Adam

From: Dunmore, Katie
Sent: 29 July 2022 10:31
To: Bischer, Mel
Subject: RE: FCC Feedback

Hi Mel,

I don't have anything in writing from Claire, we may have chatted over the phone but nothing of significance was provided by FCC to support the application.

I did call Claire last week as their consultant mentioned FCC have discussed the partial refusal with her. Claire isn't commenting, leaving it to us.

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Sent: 28 July 2022 17:09
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: FCC Feedback

Thanks for sharing Katie. Did you get any feedback from Claire on this?

Mel

Mel Bischer CMgr MCMI
Principal Permitting Team Leader, National Permitting Service
Environment Agency | Horizon House, Deanery Road, Bristol BS1 5AH

melanie.bischer@environment-agency.gov.uk
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#loveyourlunchbreak

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Sent: 28 July 2022 09:57

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Subject: RE: FCC Feedback

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From: Dunmore, Katie
Sent: 19 November 2021 11:55
To: Roberts, Claire <claire.v.roberts@environment-agency.gov.uk>
Subject: FW: FCC Feedback

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Katie Dunmore
Permitting Officer
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✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
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From: Dunmore, Katie
Sent: 19 November 2021 11:41
To: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>
Subject: RE: FCC Feedback

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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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From: Haddock, Samantha

Sent: 17 November 2021 08:58

To: Alexander, Mike <mike.alexander@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Grills, Rachael <rachael.grills@environment-agency.gov.uk>; Haines, Thomas <Thomas.Haines@environment-agency.gov.uk>; Lythgo, Kirstie <Kirstie.Lythgo@environment-agency.gov.uk>; Miller, Stuart <Stuart.Miller1@environment-agency.gov.uk>; Morris, Chris <chris.morris@environment-agency.gov.uk>; Pople, Emily <emily.pople@environment-agency.gov.uk>; Smith, Jennie <Jennie.Smith@environment-agency.gov.uk>; Barker, Paul <paul.e.barker@environment-agency.gov.uk>; DiStefano, Francesco <Francesco.DiStefano@environment-agency.gov.uk>; Giles, Ruth <Ruth.Giles@environment-agency.gov.uk>; Hann, Louise <louise.hann@environment-agency.gov.uk>; Hunt, Simon <Simon.Hunt@environment-agency.gov.uk>; Palmer, Clara <Clara.Palmer@environment-agency.gov.uk>; Pemberton, Emma <emma.pemberton01@environment-agency.gov.uk>; Tearle, Jess <Jess.Tearle@environment-agency.gov.uk>; Walker, Jake <Jake.Walker@environment-agency.gov.uk>; Wycherley, Miranda <miranda.wycherley@environment-agency.gov.uk>

Subject: FCC Feedback

Morning all

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- Permit number
- Site name
- contact at FCC
- Detail
- outcome needed (if any)

Please send these to me by Wednesday 24th November

Thanks

Samantha Haddock

Permitting Team Leader (Bristol Installations)

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

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

Please note I don't work on Thursdays.

samantha.haddock@environment-agency.gov.uk

External: 02030 254710

Mobile: 07796997145

Grange, Adam

From: Turner, Martin
Sent: 04 November 2021 16:38
To: Haslam, Mark
Cc: Candlin, Mark; Martin, Val; Dunmore, Katie; Bird, Jamie; Smith, Heather
Subject: Daneshill asbestos treatment facility - SHPI

Hello Mark

I hope all is well

Just a heads up really – A permit application has been put into NPS for a treatment facility next to daneshill landfill which is proposing to treat asbestos contaminated soils. Unsurprisingly it has gathered a lot of public interest with up to 60 responses to an Agency consultation invite.

I met with C&E and NPS and we have agreed that if it can address the Agency's concerns and is on the way to being issued then we will be duly notified as it could steer towards a SHPI which will then trigger all the necessary forms and considerations for that.

Kind regards

Martin

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



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Grange, Adam

From: [REDACTED]
Sent: 18 October 2021 08:20
To: Dunmore, Katie
Subject: RE: Further clarification required Daneshill STF

Good Morning Katie,

Thank you for your emails- I am confirming a response with the Operator.

Kind Regards
[REDACTED]



Caulmert Limited

Senior Environmental Consultant

Mobile: [REDACTED]

Direct: [REDACTED]

www.caulmert.com

Phone: [REDACTED]

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

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

Sent: 13 October 2021 18:49

To: [REDACTED]

Subject: Further clarification required Daneshill STF

Hi [REDACTED]

Following on from my previous email could you also clarify point 24 on the Schedule 5 response. It's noted 30m³ of wood will be stored. The location however is not included on the plan. The location of the ammonium nitrate is 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?

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
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Grange, Adam

From: Jones, Rhidian
Sent: 30 September 2022 09:16
To: Bischer, Mel; Dunmore, Katie
Subject: Daneshill HPI comms to stakeholders
Attachments: Draft decision letter - Variation Application - FCC Daneshill.doc

Good morning Katie and Mel,

Please see the draft version of the correspondence we intend to send out to stakeholder regarding the permit variation at Danes Hill landfill site (EPR-NP3538MF).

If you have any comments please let me know.

Kind regards,

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

Grange, Adam

From: Dunmore, Katie
Sent: 22 October 2021 14:09
To: Alexander, Mike
Subject: RE: Katie and Mike chat

Thanks Mike,

Doc attached. I haven't fully assessed the OMP yet.

There are a lot of inconsistencies with this application. Here the OMP describes the biofilter as woodchip however the application documents specifically state the biofilter will be constructed from EWC 19 05 03 off spec compost with smaller amounts of 19 12 06 woodchip and seeded with 2% waste from the process. I'm waiting for clarification from the operator on multiple issues but working on the assumption that they propose off spec compost.

I have concerns regarding the use of this. Abraham is checking with E&B if this has ever come up before and how to approach it.



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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From: Alexander, Mike
Sent: 22 October 2021 12:39
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Katie and Mike chat

Hi Katie

No worries. If you want to send me the AQA report if I get time next week I'll have a skim over it. I'm probably only taking one day off, as nothing planned.

Hope you have a good week off. 😊

Mike

-----Original Appointment-----

From: Dunmore, Katie

Sent: 22 October 2021 12:04

To: Alexander, Mike

Subject: Canceled: Katie and Mike chat

When: 22 October 2021 14:30-15:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

Where:

Importance: High

Hi Mike,

I haven't had chance to gather questions for our chat this afternoon.

I have an AQA report for emissions of VOCs from a biofilter and I'm not sure how to approach the assessment. Given its Friday and I'm off for most of next week I think it's probably worth catching up with this after half term.

Have a good weekend.

Thanks
Katie

Grange, Adam

From: Jones, Rhidian
Sent: 15 September 2022 10:33
To: Bischer, Mel; Dunmore, Katie
Cc: Turner, Martin
Subject: Daneshill HPI

Morning Mel and Katie,

I hope you are well. Our area Comms and engagement team have picked up this piece of work and we are currently working on a plan.

At this stage we would like to know the following –

- Conformation where we are at with the permitting decision
- Is there a link to anything relating to this on citizen space
- Where can we get the details of stakeholders which would need to be informed

I am really really sorry if these are basic daft questions but as I have mentioned this is a first for me!

Kind regards,

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

Grange, Adam

From: Turner, Martin
Sent: 23 November 2021 08:47
To: Dunmore, Katie; Correspondence, EMD
Subject: RE: Minister Pow meeting with Brendan Clarke Smith MP - 23 November 11.45-12.45

Hi

I think Katie's response is spot on – Personally I would also add the assurance that the Agency is well aware of resident concerns.

Martin

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



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From: Dunmore, Katie
Sent: 22 November 2021 21:31
To: Correspondence, EMD <EMDcorrespondence@environment-agency.gov.uk>; Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: RE: Minister Pow meeting with Brendan Clarke Smith MP - 23 November 11.45-12.45

Hi Mark,

I'm not aware of a standard response but as you say all applications must be assessed on merit. We have to consider all applications if received complete and can be duly made. The permitting core guidance states "*The regulator must decide whether to grant or refuse the proposal in an application and, where applicable what permit conditions to impose*".

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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From: Correspondence, EMD

Sent: 22 November 2021 18:00

To: Turner, Martin <martin.turner@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Correspondence, EMD <EMDcorrespondence@environment-agency.gov.uk>

Subject: FW: Minister Pow meeting with Brendan Clarke Smith MP - 23 November 11.45-12.45

Importance: High

Hi,

Apologies for the late email and tight deadline.

Paul Lockhart & Emily Mayle are meeting with Minister Pow and [REDACTED] tomorrow to discuss flood risk in Bassetlaw. However, the highlighted question has appeared late on the scene. There is a link, which appears to take me to as permit variation for Daneshill. Is there anything that I can send to the Minister as she will need to field the question? I assume that we have a generic response re-assuring the general public that we consider all applications on merit?

I need to get back by 10.30am, so if something could be issued by 10am I will check with Bryan Hemmings, Acting AD whether he needs to sign off any response we can provide?

Thanks

Mark

07825 843091

From: Mayle, Emily

Sent: 22 November 2021 17:35

To: Correspondence, EMD <EMDcorrespondence@environment-agency.gov.uk>

Cc: Lockhart, Paul <paul.lockhart@environment-agency.gov.uk>

Subject: RE: Minister Pow meeting with Brendan Clarke Smith MP - 23 November 11.45-12.45

Hi Mark,

We can cover [REDACTED] point – I agree with your conclusion and can clarify the funding situation in the meeting.

The highlighted one ought to go to the AEM for this area I would suggest, and potentially NPS as well as its waste regulation rather than flood risk related.

FYI, our Senior Users for Retford and West Stockwith/LIAMs will have bullet point updates to share with the Minister as early as we can tomorrow but given I've only asked for it tonight and they'll need Paul/Bryan sign off, might be cutting it fine before the meeting. We'll work to the same 10:30 deadline.

Thanks
Emily

Emily Mayle

Partnerships and Strategic Overview Team Leader | Nottinghamshire and Tidal Trent
Environment Agency | Trentside Offices | Scarrington Road | West Bridgford | Nottingham | NG2 5BR

Contact | Int: 53230 | Ext: 020302 53230 | emily.mayle@environment-agency.gov.uk

Incident management standby role: Flood Warning Duty Officer | Tactical Liaison Officer



From: Government Relations

Sent: 22 November 2021 17:27

To: Correspondence, EMD <EMDcorrespondence@environment-agency.gov.uk>

Cc: Lockhart, Paul <paul.lockhart@environment-agency.gov.uk>; Mayle, Emily <emily.mayle@environment-agency.gov.uk>; Government Relations <Government.Relations@environment-agency.gov.uk>

Subject: RE: Minister Pow meeting with Brendan Clarke Smith MP - 23 November 11.45-12.45

Importance: High

Hi Mark (and copying Paul and Emily for awareness)

Minister Pow's office have given us head's up of two questions for the meeting with Cllrs have submitted in advance (one is nothing to do with flooding!) – I have copied these both below in bold.

Is there any chance you would be able to get me a few bullets to address the first one, highlighted, say by 10.30am tomorrow, so we have time to get that across to the Minister before the meeting – just some high level lines for her to respond to the question? Even if we just have to say something quite generic that we will not permit activity if it will harm environment...?

On the second one, I think we have this broadly covered in the briefing already (e.g. any scheme needs to demonstrate economic feasibility and value for money and is subject to government partnership funding rules, and we have made it clear to local partners that traditional scheme will be challenging on these grounds) – but if there is anything more specific we can say about the affordability of this scheme then that may help. I have tried to reassure Defra colleagues that the Cllr is obviously trying to make a point and so it is probably the case something was lost in translation and we would not have bluntly said “there is no money for it” – but will be useful for Paul and Emily to be prepared for that.

Question from [REDACTED] - Bassetlaw District Council - Member for [REDACTED]

Re: Environment Agency

<https://www.gov.uk/government/publications/dn22-8rb-fcc-recycling-uk-limited-environmental-permit-application-advertisement-eprnp3538mfv009/dn22-8rb-fcc-recycling-uk-limited-environmental-permit-application-advertisement-eprnp3538mfv009>

The company FCC already has enough Soil Treatment and Recycling plants in our area. Why is DEFRA or The Environment Agency considering giving them yet another license to treat waste soil and other waste items right next to a NATURE RESERVE where we recently released Beavers back into the environment. Residents in my ward are looking for an assurance that they will NOT be granted a license.

What can the Minister advise?

Second Question:

Question from [REDACTED]:

Defra statement and Question

Worksop town centre has suffered two severe floods and two near misses since the turn of the century.

We have an ever changing climate with the potential risk of future incidents increasing, we are sat waiting for the next flood with fingers crossed and sandbags at the ready, which is not good enough.

Two weeks ago I attended a meeting with our MP Brendan Clarke-Smith and the EA, during the meeting the EA made it clear there is a solution, but there is no money to support it.

Over many years Worksop has had to suffer the inaction of our Labour led District Council, with little or no innovation or investment, our once proud market town is now decimated.

We have sat back and suffered, our town centre is unsafe, unkempt and under constant threat from the floods.

Hope was offered in December 2019/20 by our Government and there has been a lot of talk regarding 'levelling up'.

To our local economy, town and residents 'levelling up' means saving the town from future floods, there is a solution it just needs government investment, the alternative is a return to the Red Wall.

My question is:

We talk about 'levelling up', to Worksop's business economy and residents 'levelling up' looks like financial investment by government, giving Worksop town centre, the local economy and residents a much needed boost and the opportunity to thrive once again.

Thank you,

County [REDACTED].

Thanks, Zac

Zac Lamdin | Senior Government Relations Adviser

Pronouns: he/his ([why is this here?](#))

Environment Agency | 2 Marsham Street, London SW1P 4DF
Tel: 0208 474 5469 | Mob: 07917 595188 | Email: zac.lamdin@environment-agency.gov.uk

From: Government Relations

Sent: 22 November 2021 16:23

To: Correspondence, EMD <EMDcorrespondence@environment-agency.gov.uk>; Lockhart, Paul <paul.lockhart@environment-agency.gov.uk>; Mayle, Emily <emily.mayle@environment-agency.gov.uk>

Cc: Government Relations <Government.Relations@environment-agency.gov.uk>

Subject: Minister Pow meeting with Brendan Clarke Smith MP - 23 November 11.45-12.45

Hi Mark, Paul and Emily

Just to let you know that I've now had the meeting time for tomorrow confirmed – its scheduled for 11.45 – 12.45. Minister Pow's office should forward on the appointment to you (Paul and Emily) directly, so you should have that soon if not already. There won't be time for a pre-brief with the Minister before the meeting.,

Also for awareness I understand in addition to the MP the following cllrs are being invited:



Thanks

Zac

Zac Lamdin | Senior Government Relations Adviser

Pronouns: he/his ([why is this here?](#))

Environment Agency | 2 Marsham Street, London SW1P 4DF
Tel: 0208 474 5469 | Mob: 07917 595188 | Email: zac.lamdin@environment-agency.gov.uk

Grange, Adam

From: Dunmore, Katie
Sent: 08 July 2021 11:30
To: Redfearn, Stuart
Subject: Daneshill Landfill Site, proposed new soil treatment facility. EPR/NP3538MF/V009

Hi Stuart,

I've received a variation application for the above site and I believe you are the local officer.

The operator proposes to install a STF treating up to 50,000 tonnes of hazardous and non-hazardous waste by bioremediation and picking asbestos containing soils. The application is not-duly made at the moment and its very light on detail. There's significant concern regarding the asbestos side of things as they also want to use a mechanical screener. Its early days though.

I was wondering if you were aware of the application and had any comments or concerns?

Customer engagement did contact me yesterday to confirm they have received comments from Nottm County Council that local resident are likely to want to comment on the proposal. It's a substantial variation and therefore once duly made we will be consulting the local authority and it will be advertised on Gov.UK which I think is sufficient to capture local opinion. If you have any local knowledge though it would be gratefully received.

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
📧 katie.dunmore@environment-agency.gov.uk

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Grange, Adam

From: Dunmore, Katie
Sent: 29 September 2021 13:27
To: Turner, Martin
Subject: Daneshill Landfill STF application

Hi Martin,

Just checking in with regards to the above. Have you had chance to consider if you want to run this as a HPI?

Citizen Space is now closed. We have received roughly 60 responses.

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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Grange, Adam

From: Dunmore, Katie
Sent: 05 May 2022 14:11
To: Turner, Martin
Subject: Daneshill Landfill STF permit variation update

Hi Martin,

Just a quick update regarding the above. Determination is almost complete. I'm just awaiting technical and legal input before I communicate with the operator.

We have decided to refuse the asbestos screening and handpicking activity in its entirety. Screening for the reasons previously discussed, the applicant also wasn't able to provide any meaningful mitigation for the handpicking activity either.

Bioremediation of hazardous and non-hazardous waste will be permitted as will the use of waste (19 05 03 off spec compost) as a biofilter medium. We are including a number of pre-operational and improvement conditions to ensure site set up and operation is as it should be. Considering this once the documents are finalised I think it would be useful if I forwarded the document over for you to take a look.

Kind regards

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

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

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Grange, Adam

From: Dunmore, Katie
Sent: 17 May 2022 16:29
To: Turner, Martin
Subject: Daneshill landfill STF permit variation
Attachments: LIT 11951 - Decision document variation.docm; LIT 12001 - Notice of variation and consolidation single permit.docm

Hi Martin,

The above variation is complete and I've attached the permit docs for your review. The highlighted sections in the permit are those added or amended as part of the variation.

We have included a couple of improvement conditions requiring the operator provided detailed evidence the biofilter is functioning correctly. We are permitting the use of EWC 19 05 03 based on the monitoring data they have provided for a similar site which is operating without issue. I'm awaiting a second opinion from E&B on the biofilter monitoring requirements but they are unlikely to change significantly.

We are permitting the STF treatment tonnage requested even though asbestos treatment is refused. The volume of waste itself wasn't a problem. The operator is however likely to revise the site layout given the refusal (which I haven't discussed with the yet). I'm therefore not trying them into any specific site layout plan at this time.

I haven't included dust or odour management plans in the Operating Techniques table. I don't think they are brilliant but are sufficient for permit determination. Dust was a particular issue due to the asbestos activity but given this is now not permitted and the site is within the landfill boundary dust from bioremediation is less of an issue. Similarly odour shouldn't be a concern given they are treating oily waste, this is however one of my queries regarding biofilter monitoring.

Please let me know if you have any questions.

Kind regards

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

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

mob: 07584 369561

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Grange, Adam

From: Jones, Rhidian
Sent: 23 September 2022 14:11
To: Dunmore, Katie
Subject: FW: Daneshill HPI

Katie,

This is our proposed course of action.

Rhidian

From: Storr, Charlotte <charlotte.storr@environment-agency.gov.uk>
Sent: 22 September 2022 14:08
To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Cc: Gallagher, Ray <ray.gallagher@environment-agency.gov.uk>
Subject: RE: Daneshill HPI

Hi Rhidian

In that case, if you'd still like to class it as a SHPI we can carry out what we call some light touch engagement. My colleague Ray who will lead on this will send through a draft letter which will contain sections for you to fill in the permit and site details and check that the permitting terminology is correct (you could run it past your permitting officer Mel).

You'll then need to identify your stakeholders and let Ray know, and as it has been confirmed that for data protection you wont be able to contact those who raised concerns via the permitting consultation via Gov.uk/Citizen Space, I'd advise getting the email addresses for the Parish Councils at Daneshill which I believe to be Scrooby, Torworth and Ranskill (STAR). Ray will work closely with yourself and permitting so he can email the Parish Councils with the link to the draft decision once it goes live.

Many thanks

Charlotte Storr
Engagement Specialist
East Midlands
077954 27590

From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Sent: 20 September 2022 12:57
To: Storr, Charlotte <charlotte.storr@environment-agency.gov.uk>
Subject: Fwd: Daneshill HPI

Hello Charlotte

This is the response from bps regards daneshill.

Thanks

Rhidian

Sent from my iPhone

Begin forwarded message:

From: "Bischer, Mel" <melanie.bischer@environment-agency.gov.uk>
Date: 20 September 2022 at 09:30:55 BST
To: "Jones, Rhidian" <Rhidian.Jones@environment-agency.gov.uk>, "Dunmore, Katie" <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill HPI

Hi both

Just to confirm that we will need to advertise our draft decision which I believe will still be through Citizen Space. So once you've spoken with the team in Sheffield, Katie to understand timeframes, we can give you a heads up Rhidian so that area engagement is aligned. This normally lasts a month and involves publishing of the draft notice and decision document. In terms of stakeholders, the comms and engagement plan would normally come from the local team, as you are best placed to identify any stakeholders.

Kind regards
Mel

Mel Bischer CMgr MCMI
Principal Permitting Team Leader, National Permitting Service
Environment Agency | Horizon House, Deanery Road, Bristol BS1 5AH

melanie.bischer@environment-agency.gov.uk
Mobile: 07771 387706

Say my name (phonetic spelling): *Mel Bih-shuh*

Pronouns: she/her ([why is this here?](#))

[No need to thank me](#)

Working days: Monday to Friday



Incident management role: (Duty) National Base Controller



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Network**



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#loveyourlunchbreak

From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Sent: 16 September 2022 08:24
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Subject: RE: Daneshill HPI

Thanks Katie much appreciated

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 15 September 2022 16:25
To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Cc: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Subject: RE: Daneshill HPI

Hi Rhidian,

The permit is complete and FCC are aware of our decision. They have reviewed the draft permit and have no comments regarding the bioremediation activity. We therefore assume they accept the monitoring requirements and conditions imposed.

FCC are unhappy with the refusal of the asbestos activity and did offer to house this within a building, requesting the determination be reopened. We have not agreed to this and the refusal stands. No further action is required on the permit.

Its almost a year since this application was advertised on Citizen Space, there wont be anything on there now. All application documents are on DMS. I shall upload anything I have tomorrow. Its many months since I worked on this application actively so I need to refresh my mind and check all relevant information is on there.


We had many local comments, details saved to DMS. I've however spoken to Mel and I don't believe we should respond to these directly for reasons of data protection etc. The comments raised have been address within the Decision Document.

I'm not aware of an active local group. I was contacted directly by a local resident and from what I remember of the conversation information was spread by word of mouth.

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

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From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Sent: 15 September 2022 10:33
To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: Daneshill HPI

Morning Mel and Katie,

I hope you are well. Our area Comms and engagement team have picked up this piece of work and we are currently working on a plan.

At this stage we would like to know the following –

1. Confirmation where we are at with the permitting decision
2. Is there a link to anything relating to this on citizen space
3. Where can we get the details of stakeholders which would need to be informed

I am really really sorry if these are basic daft questions but as I have mentioned this is a first for me!

Kind regards,

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

Grange, Adam

From: Dunmore, Katie
Sent: 24 February 2022 14:56
To: Raynes, Graham
Subject: Daneshill Landfill. Asbestos soil screening and BAT 14
Attachments: Daneshill BAT 14.pdf

Hi Graham,

FCC have provided further justification for their proposed asbestos soil screening and hand picking operations at the above site. I had previously confirmed with the operator these activities would be refused given we did not consider the proposal met BAT 14, in particular containment, collection and treatment of diffuse emissions.

FCC's have made an additional submission in support of their application which I have attached. I have the following questions and comments as to whether the submission provides appropriate assurance and I'd appreciate your advice as to whether we should stick with a refusal of this activity.

To summarise all storage and treatment activities are still proposed to be undertaken outside with the picking operation undertaken in a mobile above ground picking station with plastic weather covering like structure. The screener and conveyers leading to it are now enclosed with HEPA filtration as described in the document. Boundary monitoring and has been tightened up. The operator now proposes to monitor outside the picking station. I'm still however unsure if this monitoring is reliable or possible down to the detection limits FCC describe.

Monitoring. FCC confirm monitoring results will be available within 1hr of sampling. Mitigation undertaken if fibres detected above 0.001f/ml. Is this possible in an external environment?

Boundary monitoring has a detection limit of 0.0005f/ml again is this something we could rely on outside?

The monitoring plan referenced shows a couple of monitoring location on each treatment pad. This will need further clarification as previously FCC confirmed asbestos operations would be mobile from one pad to another with no dedicated location. This document now confirms asbestos storage and processing will be on a dedicated pad.

Picking station and screener

Is the proposed screener in line with the proposal at Rowley Regis?

The screener is now enclosed with monitored HEPA filter. Hopefully diffuse emissions from the activity could be avoided. My concern however is that asbestos pieces will be broken by the agitation. The output soils will then be discharged into the picking station.

As previously detailed this is a mobile unit with windows and flimsy cover. I would consider without screening this could be OK based on the fibre content of the soils at Waste Acceptance. Now however I'm concerned these soils will have a higher fibre load due to passing through the screener.

The input and output conveyors are uncovered with water suppression provided by spray rail – don't think this is enough.

My thoughts

Based on the WAP limits for fibres within the soil we could potentially permit the hand picking activity. Without the agitation of screening the methods proposed seem robust enough to prevent asbestos pieces breaking and fibre emissions unlikely.

For the reasons stated above I think the screening still doesn't meet BAT because it will increase the fibre load of the soil which would then be released by use of open conveyors, handpicking, dropping into storage piles.

Any thoughts you have would be gratefully received and how this might fit into the use of the screen at Rowley Regis.

Kind regards

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

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

mob: 07584 369561

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

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Grange, Adam

From: Dunmore, Katie
Sent: 05 September 2022 15:43
To: Raynes, Graham
Subject: Daneshill permit
Attachments: LIT 12001 - Notice of variation and consolidation single permit.docm

Graham,

Document as discussed.

Kind regards

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

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Grange, Adam

From: Dunmore, Katie
Sent: 08 June 2022 13:09
To: Turner, Martin
Subject: Daneshill STF permit variation


Hi Martin,

Do you have any comments on the above? I've dropped off grid a bit with FCC and need to get this out to them for their review too.

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

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Grange, Adam

From: Dunmore, Katie
Sent: 18 November 2021 13:23
To: Tucker, Tania
Subject: EWC 19 05 03 as a biofilter medium

Hi Tania,

I've received the below response from FCC as to why 19 05 03 is considered a suitable biofilter medium and how it meets BAT.

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.

Considering they need to cover the filter medium to reduce the potential for odour doesn't fill me with confidence.

I've asked which sites have this type of biofilter. This was raised across centre by the PPO group and it hadn't come up before.

I'm slightly concerned about accepting evidence from previous sites. This Daneshill application almost entirely comprises evidence (which I can't verify) from their other sites that they consider evidences there is no risk of emissions. This is particularly stark for the lack of mitigation for asbestos soil treatment. Its proving tricky to assess.

Any further thoughts you have on the biofilter would be appreciated.

Kind regards

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

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

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Grange, Adam

From: Dunmore, Katie
Sent: 18 August 2021 09:00
To: PSC Land
Subject: FCC Recycling, Daneshill Landfill EPR/NP3538MF/V009 web advert

Hi P&SC,

I'm just checking as to whether the above web advert is live yet?

I don't want to miss when this happens as we have been notified by the local CC that this application is going to attract a lot of attention. We don't want to make it HPI at the moment but we have advised them that we would send the Citizen Space link over to allow comments in this way.

Could you let me know as soon as consultation opens please.

Kind regards

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

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Grange, Adam

To: Bischer, Mel
Subject: FW: Asbestos soil treatment activities proposed at Daneshill Landfill Site. EPR/NP3538MF/V009

Hi Mel,

Another example email for FCC. This follows a phone conversation and was underpinning the meeting Claire was to have with FCC. I don't think I could have been more plain we needed more information. I have RFI after RFI to their consultant in a similar vain. Nothing significant was provided. I do believe they offered to enclose the conveyer but the soil was then ejected into an uncovered stockpile.

I haven't at any point advised what they should do, certainly not build a building. If I remember rightly the site is an old munitions site and there has been comment that a building may not be appropriate.

I stopped asking questions in the end and concentrated on the bioremediation side of things. I don't think there was anything more I could explain or expand upon.

They did ask for a meeting, at the time I was in touch with Warrington who were dealing with the Rowley Regis screen. Meetings were being requested but there was a general feeling that everything had been said, arguing and they were sucking up so much time when everything had been said, plus they were meeting with Claire.

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Dunmore, Katie
Sent: 25 November 2021 12:23
To: [REDACTED]
Subject: Asbestos soil treatment activities proposed at Daneshill Landfill Site. EPR/NP3538MF/V009

Hi [REDACTED]

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 conveyor and be formed into further stockpiles.

Q.16 required an explanation of any emissions abatement within the picking booth and if not an explanation how airborne fibres are captured and contained. We further stated:

Reason - We have significant concerns that the asbestos soil storage, transfer and treatment activities as described do not meet BAT. There appears to be no specific mitigation or abatement proposed with stockpiles described as being deposited, screened and transferred to a picking station with doors and windows, via conveyors and then further deposited in open stockpiles.

The Emissions Management Plan states "asbestos fibres are not generated on site above the detection limit so no abatement system is required". We disagree, screening and dropping from height will agitate and may break asbestos materials and lead to release of fibres. Dust suppression and "wetting solution" alone is not considered sufficient mitigation. You must demonstrate through detailed working procedures how asbestos soils are stored, treated and handled to ensure the containment and collection of diffuse emissions. As stated in BAT we would expect techniques such as;

- *Storage and treatment in enclosed buildings and/or equipment*
- *Maintaining enclosed equipment under adequate pressure*
- *Collecting and directing emissions to an adequate abatement system*

Your response directed us to discussions being held with the Environment Agency regarding activities on another site.

Q.14 requested the operator describe how waste would be transferred to the post treatment storage location. You answered that soil wouldn't pose a risk once validated and that normal dust suppression would be applied. We therefore conclude stockpiles would remain uncovered.

We consider the proposed activities do pose a risk of generating airborne asbestos fibres. Degraded asbestos pieces contained within the soil may pose a risk of realising fibres which will be compounded by handling and treatment. No containment measures are proposed.

No information has been provided regarding the asbestos screening activity which is stated within the application as pre-screening prior to handpicking using a three-way screener. Limited detail is provided on abatement or containment and the operator did not answer the questions within the Schedule 5, instead referencing asbestos monitoring results from Edwin Richards Quarry.

The operator must demonstrate the use of BAT for the application site and that all necessary operational controls will be in place to mitigate and capture emissions. That has not been demonstrated at Daneshill STF and for that reason

we are confirming that based on the information provided to date the asbestos storage and treatment activity cannot be permitted. Therefore no further assessment around this issue would be useful at this time.

I've received your request for a meeting with myself and Chris Hall to understand how the asbestos activity can be taken forward. Please take this email as a direction on this. In order to take the asbestos activity forward the operator must reconsider the relevant sections of the Schedule 5 notice highlighted above explaining how BAT will be achieved for the asbestos activity at this location. We can discuss a suitable timeframe. Alternatively we suggest the operator withdraws the proposals for the asbestos soil treatment activity.

I understand a meeting is to be held between the operator and their account manager Claire Roberts. I have flagged our concerns for this application with Claire and I believe this will be raised at the meeting.

In the mean time I'll await a decision as to whether the operator chooses to withdraw or confirm if there is further scope to provide the information requested within a reasonable timeframe.

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
📧 katie.dunmore@environment-agency.gov.uk

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Grange, Adam

From: Hall, Chris
Sent: 10 November 2021 09:26
To: Dunmore, Katie
Cc: Raynes, Graham
Subject: FW: Asbestos soil treatment best practice guide
Attachments: SOIL TREATMENT options v 2.9 fixed plant requirements.docx; WRG Warley HP3632RP consolidated permit 02-06-21.docm

Katie

You may be referring to the attached. I started a specific guidance note for soil treatment and appropriate measures but I have been involved in permit review and that work is my only real focus at the moment so the specific guide will have to wait. Since we first started looking at soil remediation where the soil was impacted with asbestos fragments the situation has become more complicated. We have a site permitted for screening of asbestos albeit we are in dispute with them over the enclosing of the operation for dust and asbestos fibre emissions abatement and we have a site that wants to wash soils impacted with asbestos fragments – this permit is still being written but we are adding in a clause “The washing of asbestos impacted wastes shall not increase the asbestos fibre load in the waste” because we have concerns that the washing process designed to fractionate the soil into heavy, medium and fine fractions will put asbestos fibres from the cement into the soil/stones matrix..

Our latest ideas regarding dual coding is to make the dual coding one entry in the permit for example:

| 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*and 17 06 05* | 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 05 04 and 17 06 05* | 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)) |

This clearly shows that the one waste has to be dual coded.

This is still an evolving process but I do not have time at the moment to devote to it.

If you have a particular site permit in mind, for example you were dealing with the Daneshill Landfill site, then Graham Raynes and I can talk you through it..

Dr Chris Hall
Senior Advisor
Environment Agency

☎ 02030 251169

I work Monday to Thursday

From: Dunmore, Katie
Sent: 09 November 2021 16:34
To: Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: Asbestos soil treatment best practice guide

Hi Chris,

A couple of years ago you forwarded me a couple of documents on asbestos transfer and treatment. One was the storage and transfer quick guide available on the Intranet another was a short document relating to best practice focused on soil treatment sites – informal BAT. I can't find this second document, It may not have been published. If you can think of the one I mean do you have a copy?

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
8 katie.dunmore@environment-agency.gov.uk

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Grange, Adam

From: Turner, Martin
Sent: 12 October 2021 09:00
To: Candlin, Mark
Cc: Dunmore, Katie; Smith, Heather
Subject: FW: Daneshill asbestos treatment 8 Oct 2021

Hello Mark

I hope all is well

See e mail chain below

60 responses of concern from nearby residents to a variation application to treat asbestos soils at Daneshill Landfill

What additional engagement measures can you advise and do you think this should be a SHPI?

Thanks

Martin

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



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From: Dunmore, Katie
Sent: 11 October 2021 17:38
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Smith, Heather <heather.smith@environment-agency.gov.uk>
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi Martin,

What is your plan for additional engagement with the local community? We change the applicant an additional £500 to cover the additional costs of this and before we go forward we need to understand how this is going to done.

Word of mouth has already been pretty strong in the village. I have the details of one resident who contacted me via the call centre and requested the original Citizen Space advert be extended. I've noted one of the responses also

details they received notification via a newspaper. I'm not sure if this is something to do with the planning application which initially alerted the locals or if someone in the village has taken steps to publicise it.

I'll be going through all the responses in greater detail this week.

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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From: Turner, Martin
Sent: 11 October 2021 16:31
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Smith, Heather <heather.smith@environment-agency.gov.uk>
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi Katie

Thanks for your response - I will do though I'm not really sure what the question is?

Mart

Martin Turner
Regulated Industry Officer
Environment Agency | Trentside Offices, Scarrington Road, West Bridgford,
Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk
External: 020302 53332 |

Working days: Monday to Friday



From: Dunmore, Katie
Sent: 08 October 2021 11:27
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Cc: Smith, Heather <heather.smith@environment-agency.gov.uk>; Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi Martin,

I don't believe we have had anything from the Parish Council although Bassetlaw District have provided the email attached. This is particularly relevant to our determination. MPs comments also attached.

The majority of the 60 response are from local residents who were alerted via word of mouth. The County Council initially alerted residents following on from the planning process.

I haven't gone through the responses in detail yet.

Is it worthwhile setting up a call with my TL regarding this? Just considering what the comms plan will be.

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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From: Turner, Martin
Sent: 08 October 2021 10:16
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Smith, Heather <heather.smith@environment-agency.gov.uk>
Subject: Daneshill asbestos treatment 8 Oct 2021

Hi Katie

I hope you are well

Thanks for your message - sorry for my delayed response as I have been off work – see attached - can you confirm whether there has been MP / Parish Council interest so I can complete the form.

Thanks

Martin

Martin Turner
Regulated Industry Officer
Environment Agency | Trentside Offices, Scarrington Road, West Bridgford,

Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



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Grange, Adam

From: Haddock, Samantha
Sent: 28 July 2022 09:22
To: Dunmore, Katie; Bischer, Mel
Subject: FW: Daneshill asbestos treatment 8 Oct 2021

Hi both,
Here is some of the e-mail chain. We did have a call with them in which they decided they didn't want to take it any further.
Happy to discuss the detail of the call if needed.
We didn't do the form which might be me missing a part of the process, sorry if so.

Thanks

Samantha Haddock (She/Her)
Habitats Regulation Assessment Team
Team Leader | National Permitting Service | **Environment Agency** | Bristol
samantha.haddock@environment-agency.gov.uk | 07796997145
Please note I don't work on Mondays.

From: Haddock, Samantha
Sent: 13 October 2021 12:38
To: Smith, Heather <heather.smith@environment-agency.gov.uk>; Turner, Martin <martin.turner@environment-agency.gov.uk>; Bird, Jamie <Jamie.Bird@environment-agency.gov.uk>
Cc: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi all

I hope you are well sorry to jump in and I am sure you already know this but wanted to extend the offer of a call if you feel it is needed.

If there are 60 responses to the application it may be you want to consider it to be a High Public interest site. This would involved have a comms and engagement officer support you in making a communications plan and also completing the HPI form.

Information on comms and engagement is found here on the Sharepoint [Engagement Guidance - All Documents \(ea.gov\)](#) , [Environment Agency - Why we engage with others \(ea.gov\)](#)

The form has to be agreed by your AEM and then sent over to myself with a comms plan. This may not be extensive but might allow the public to have site of a decision at the minded to stage.

Please shout if I can help.

Thanks

Samantha Haddock
Permitting Team Leader (Bristol Installations)
National Permitting Service (Part of Operations – Regulation, Monitoring and Customer)
Environment Agency | Horizon House, Deanery Road, Bristol, BS1 5AH

My working days are Tuesday - Friday
samantha.haddock@environment-agency.gov.uk
External: 02030 254710

Mobile: 07796997145

From: Smith, Heather <heather.smith@environment-agency.gov.uk>
Sent: 12 October 2021 13:03
To: Turner, Martin <martin.turner@environment-agency.gov.uk>; Bird, Jamie <Jamie.Bird@environment-agency.gov.uk>
Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Martin

Do we need to chat about this more?

Cheers
Heather

From: Dunmore, Katie
Sent: 11 October 2021 17:38
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Smith, Heather <heather.smith@environment-agency.gov.uk>
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

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I'll be going through all the responses in greater detail this week.

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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From: Turner, Martin
Sent: 11 October 2021 16:31
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Smith, Heather <heather.smith@environment-agency.gov.uk>

Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi Katie

Thanks for your response - I will do though I'm not really sure what the question is?

Mart

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



From: Dunmore, Katie

Sent: 08 October 2021 11:27

To: Turner, Martin <martin.turner@environment-agency.gov.uk>

Cc: Smith, Heather <heather.smith@environment-agency.gov.uk>; Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>

Subject: RE: Daneshill asbestos treatment 8 Oct 2021

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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

☎ 02030 254435 (internal 54435) mob: 07584 369561

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

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From: Turner, Martin
Sent: 08 October 2021 10:16
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Smith, Heather <heather.smith@environment-agency.gov.uk>
Subject: Daneshill asbestos treatment 8 Oct 2021

Hi Katie

I hope you are well

Thanks for your message - sorry for my delayed response as I have been off work – see attached - can you confirm whether there has been MP / Parish Council interest so I can complete the form.

Thanks

Martin

Martin Turner
Regulated Industry Officer
Environment Agency | Trentside Offices, Scarrington Road, West Bridgford,
Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



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Grange, Adam

From: Jones, Rhidian
Sent: 16 September 2022 12:21
To: Bischer, Mel; Dunmore, Katie
Cc: Bird, Jamie; Turner, Martin
Subject: FW: Daneshill HPI

Hello all,

This is the response I have had from our Comms and engagement team.

Your thoughts would be appreciated.

Thanks

Rhidian

From: Storr, Charlotte <charlotte.storr@environment-agency.gov.uk>
Sent: 16 September 2022 12:11
To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>; Turner, Martin <martin.turner@environment-agency.gov.uk>
Cc: Gallagher, Ray <ray.gallagher@environment-agency.gov.uk>
Subject: RE: Daneshill HPI

Hi Rhidian

Thanks for this it's really useful.

We would usually class a site as high public interest if there's a permit/permit variation which is likely to cause some unease in the community or if there are a high number of complaints/responses, social media or local press interest, MP interest. If you take a look at the attached engagement plan for another site, the first few bullet points flag why that particular site is HPI.

With this site I would have suggested engagement in the earlier stages such as when the permit was received/when concerns from the public started building up. Such as via the 3 local Parish councils to make them aware of the permit/permit stages and how to respond to the consultation. As this period is over and the public are happy with the outcome I can't see the benefit to the EA or the public of any engagement at this stage. Would it be possible for you to ask your colleagues who flagged it as an HPI if they're satisfied with this conclusion? If the site apply for anything contentious in the future you can by all means flag it up to us then because of the previous interest in this site from the local community which would actually be a trigger for engaging.

Happy to have a chat. Let me know if your satisfied at your end that although it's now on our radar, as it stands at the moment no engagement is required.

Many thanks

Charlotte Storr
Engagement Specialist
East Midlands
077954 27590

From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Sent: 16 September 2022 08:24
To: Storr, Charlotte <charlotte.storr@environment-agency.gov.uk>; Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: FW: Daneshill HPI

Morning all

This is the status of the Daneshill HPI

I hope this info helps shape our response?

Thanks

Rhid

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 15 September 2022 16:25
To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Cc: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Subject: RE: Daneshill HPI

Hi Rhidian,

The permit is complete and FCC are aware of our decision. They have reviewed the draft permit and have no comments regarding the bioremediation activity. We therefore assume they accept the monitoring requirements and conditions imposed.

FCC are unhappy with the refusal of the asbestos activity and did offer to house this within a building, requesting the determination be reopened. We have not agreed to this and the refusal stands. No further action is required on the permit.

Its almost a year since this application was advertised on Citizen Space, there wont be anything on there now. All application documents are on DMS. I shall upload anything I have tomorrow. Its many months since I worked on this application actively so I need to refresh my mind and check all relevant information is on there.

We had many local comments, details saved to DMS. I've however spoken to Mel and I don't believe we should respond to these directly for reasons of data protection etc. The comments raised have been address within the Decision Document.

I'm not aware of an active local group. I was contacted directly by a local resident and from what I remember of the conversation information was spread by word of mouth.

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>

Sent: 15 September 2022 10:33

To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Turner, Martin <martin.turner@environment-agency.gov.uk>

Subject: Daneshill HPI

Morning Mel and Katie,

I hope you are well. Our area Comms and engagement team have picked up this piece of work and we are currently working on a plan.

At this stage we would like to know the following –

- Confirmation where we are at with the permitting decision
- Is there a link to anything relating to this on citizen space
- Where can we get the details of stakeholders which would need to be informed

I am really really sorry if these are basic daft questions but as I have mentioned this is a first for me!

Kind regards,

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

Grange, Adam

From: Tucker, Tania
Sent: 08 February 2022 11:49
To: Dunmore, Katie
Subject: FW: Off-spec compost 19 05 03 as a biofilter

Tania Tucker
E&B Senior Advisor (Non-hazardous & inert waste sector lead)
Environment Agency

tania.tucker@environment-agency.gov.uk

From: Siddle, Sophie <sophie.siddle@environment-agency.gov.uk>
Sent: 29 November 2021 16:57
To: Nicholls, Kathy <kathryn.nicholls@environment-agency.gov.uk>; Tucker, Tania <tania.tucker@environment-agency.gov.uk>
Subject: RE: Off-spec compost 19 05 03 as a biofilter

Hi Tan (and Kathy)

I haven't come across this before and in the absence of the specific details I have the following general comments to make on the suitability of this as a biofilter medium.

As there is little info provided, my initial gut feeling was that it sounds like a way to legitimise the disposal of the oversize, but I'm happy to be proven wrong on that one.

I'm assuming that it's the oversize following the composting process and it's not off-spec for any other reason i.e fine compost which hasn't met the stabilisation test etc.

I'd be interested to know how they are going to 'specifically produce' the biofilter medium. A good biofilter medium has uniform particle size, is homogenous with good porosity. Generally oversize contains a mix of hard/soft woods, possibly some treated wood etc. Also if they need to screen to a smaller size to remove plastics etc they risk creating a finer material losing porosity and compaction can also occur. This will depend on their processing techniques and could be an expense they are initially trying to bypass by offering it as a biofilter medium.

I agree with Kathy's point about characterising the gases first before determining the design and dosing procedure. Has this been done? We would need to know what they are remediating at the STP, what gases are produced, and therefore to be treated, and what is the most effective way to do this. This should be backed up with data.

It's hard to comment on the effectiveness of the tarpaulin cover without understanding the design of the bio-filter and the flow rate etc. They only state it will retain moisture content and contain odour emissions. How are they to maintain air flow and moisture for efficacy?

I've put some other comments below in green, mainly agreeing with Kathy's comments.

Sophie

From: Nicholls, Kathy
Sent: 29 November 2021 13:35
To: Tucker, Tania <tania.tucker@environment-agency.gov.uk>; Siddle, Sophie <sophie.siddle@environment-agency.gov.uk>
Subject: RE: Off-spec compost 19 05 03 as a biofilter

Hi Tan

A few occasions where it's been used. The need to demonstrate the Empty bed residence time and the residence time of the bio filter etc. The design fits the need.

Your welcome

From: Tucker, Tania
Sent: 29 November 2021 11:00
To: Nicholls, Kathy <kathryn.nicholls@environment-agency.gov.uk>; Siddle, Sophie <sophie.siddle@environment-agency.gov.uk>
Subject: Off-spec compost 19 05 03 as a biofilter

Hi

I wondered if I could pick your brains please. FCC are trying to justify using off-spec compost from one of their sites as a biofilter at a soil treatment facility. The reasoning FCC has given the permitting officer as to why it is considered a suitable biofilter is given below. The particle size comment makes sense but I am not sure about off-spec compost. The site they are using as an example is Edwin Richards Quarry EPR/HP3632RP however this has not been permitted for this type of material as a filter. Clearly they are using it though. Have you come across this type of odour control before? I can request the AQ modelling if that would help. Any thoughts? Cheers Tan

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. How are they going to 'specifically produce' this? At Daneshill Landfill, the oversize compost is hydrated and a small amount of ammonium nitrate is added to increase the available nitrogen to 1. approximately 100mg/kg to ensure that the medium is supportive of microbial proliferation once there are effluent gases passing through the biofilter; They will be better to fully characterise the gases (BAT 3) and then look at the microbial loading and population of the compost media. Before any dosing. Otherwise they will end up with a very niche population of organisms. – Agree 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. 2. This is not sufficient they need to do representative temperature and moisture of the filter to ensure the filter is kept at optimal conditions. And the biofilm is maintained. Very poor. Agree with Kathy's comments, Is the tarp acting as the main odour control? What happens with this is uncovered and disturbed? Need more info to comment on this.

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. Depends on particle size /grade that's nonsense 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 where is this ? 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. temperature inlet and out let moisture content, pH, available nitrogen, back pressure particle size etc) they need to monitor the parameters it is designed for – so if the flow rate is X at design then they need to ensure that – agree. There should be more detail on their specific design and monitoring parameters 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.

I would say that compost media can result in bioaerosols release – we have had some sites where the plenum has collapsed under the weight of the compost or as it degrades it gets more compact – so the OMP needs to set out clearly how they assess the efficacy and maintenance.

Tania Tucker
E&B Senior Advisor (Non-hazardous & inert waste sector lead)
Environment Agency

tania.tucker@environment-agency.gov.uk
External: 020 302 56785 | Mobile: 07778050209

Working days: Monday to Friday

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Grange, Adam

From: Redfearn, Stuart
Sent: 08 July 2021 11:35
To: Smith, Heather; Turner, Martin
Cc: Dunmore, Katie
Subject: FW: Daneshill Landfill Site, proposed new soil treatment facility. EPR/NP3538MF/V009

Heather/Martin,

This was sent to me.

I have directed Katie to yourselves.

Regards Stuart

Stuart Redfearn
Technical Specialist (Landfill)
GHCL Team
East Midlands (EMD)

Direct Dial : 020302 253412
Mobile : 07802330156
Email : stuart.redfearn@environment-agency.gov.uk

FROM THE 1st JULY 2021 MY WORKING DAYS WILL ONLY BE TUESDAY, WEDNESDAY & THURSDAY(am)

From: Dunmore, Katie
Sent: 08 July 2021 11:30
To: Redfearn, Stuart <stuart.redfearn@environment-agency.gov.uk>
Subject: Daneshill Landfill Site, proposed new soil treatment facility. EPR/NP3538MF/V009

Hi Stuart,

I've received a variation application for the above site and I believe you are the local officer.

The operator proposes to install a STF treating up to 50,000 tonnes of hazardous and non-hazardous waste by bioremediation and picking asbestos containing soils. The application is not-duly made at the moment and its very light on detail. There's significant concern regarding the asbestos side of things as they also want to use a mechanical screener. Its early days though.

I was wondering if you were aware of the application and had any comments or concerns?

Customer engagement did contact me yesterday to confirm they have received comments from Nottm County Council that local resident are likely to want to comment on the proposal. It's a substantial variation and therefore once duly made we will be consulting the local authority and it will be advertised on Gov.UK which I think is sufficient to capture local opinion. If you have any local knowledge though it would be gratefully received.

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
🌐 katie.dunmore@environment-agency.gov.uk

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Grange, Adam

From: Turner, Martin
Sent: 29 September 2021 14:18
To: Bird, Jamie; Smith, Heather
Cc: Dunmore, Katie
Subject: FW: Daneshill Landfill STF application

Hi

Further to my e mail on the 16 September 2021 – Any further thoughts on the matter below?

If you need an opinion I would say it probably should be

Martin

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



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From: Dunmore, Katie
Sent: 29 September 2021 13:27
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: Daneshill Landfill STF application

Hi Martin,

Just checking in with regards to the above. Have you had chance to consider if you want to run this as a HPI?

Citizen Space is now closed. We have received roughly 60 responses.

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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Grange, Adam

From: Drewry, Joe
Sent: 11 May 2022 14:38
To: Dunmore, Katie
Subject: FW: Daneshill Landfill STF permit variation update

Hi Katie,

Martin Turner passed on your details (see below) in relation to the Daneshill permit. Martin helped me provide a response to the associated planning application 18 months ago. The council are waiting to understand what happens with the permit and asked for an update. I was wondering whether I would be able to have a quick chat with you about it to understand the latest and to understand what I would be able to tell the council (if anything).

Kind Regards,

Joe Drewry

Planning Specialist

Sustainable Places – East Midlands

Email : joe.drewry@environment-agency.gov.uk

External : 02030 253277, Internal: 33277

From: Turner, Martin <martin.turner@environment-agency.gov.uk>
Sent: 10 May 2022 15:57
To: Drewry, Joe <joe.drewry@environment-agency.gov.uk>
Subject: FW: Daneshill Landfill STF permit variation update

Hi

Timely! The response below should give you everything you need to know - Best you speak to Katie if not

Martin

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



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

Sent: 05 May 2022 14:11

To: Turner, Martin <martin.turner@environment-agency.gov.uk>

Subject: Daneshill Landfill STF permit variation update

Hi Martin,

Just a quick update regarding the above. Determination is almost complete. I'm just awaiting technical and legal input before I communicate with the operator.

We have decided to refuse the asbestos screening and handpicking activity in its entirety. Screening for the reasons previously discussed, the applicant also wasn't able to provide any meaningful mitigation for the handpicking activity either.

Bioremediation of hazardous and non-hazardous waste will be permitted as will the use of waste (19 05 03 off spec compost) as a biofilter medium. We are including a number of pre-operational and improvement conditions to ensure site set up and operation is as it should be. Considering this once the documents are finalised I think it would be useful if I forwarded the document over for you to take a look.

Kind regards

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

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Grange, Adam

From: Raynes, Graham
Sent: 24 February 2022 18:45
To: Hall, Chris; Dunmore, Katie
Subject: FW: Daneshill Landfill. Asbestos soil screening and BAT 14
Attachments: Daneshill BAT 14.pdf

Chris,

FCC appear have provided Katie further justification at Daneshill – in particular:

Storage will be on the open pads but covered with sheeting between delivery and treatment.

For the proposed pre-screener they are covering and abating via a HEPA filter. Is this a development from the Rowley Regis pre-app? Has anything been agreed there?

They are also challenging why we are requiring such tight control and refer to a 'Nicole' Report (I'm not familiar with it – are you?) asking what is our evidence for fibre release.

Conveyors from screen to picking station are appear covered though Katie says uncovered – not sure. Covered would be BAT I would say – given they're in the open. The waste is damped on the way into the picking stations so would appear to not be before that stage.

Picking station itself appears OK – same design as they already use.

See also notes below in red.

What do you think?

Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B

Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

External: **020302 50600**

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

Sent: 24 February 2022 14:56

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: Daneshill Landfill. Asbestos soil screening and BAT 14

Hi Graham,

FCC have provided further justification for their proposed asbestos soil screening and hand picking operations at the above site. I had previously confirmed with the operator these activities would be refused given we did not consider the proposal met BAT 14, in particular containment, collection and treatment of diffuse emissions.

FCC's have made an additional submission in support of their application which I have attached. I have the following questions and comments as to whether the submission provides appropriate assurance and I'd appreciate your advice as to whether we should stick with a refusal of this activity.

To summarise all storage and treatment activities are still proposed to be undertaken outside with the picking operation undertaken in a mobile above ground picking station with plastic weather covering like structure. The screener and conveyers leading to it are now enclosed with HEPA filtration as described in the document. Boundary monitoring and has been tightened up. The operator now proposes to monitor outside the picking station. I'm still however unsure if this monitoring is reliable or possible down to the detection limits FCC describe.

Monitoring. FCC confirm monitoring results will be available within 1hr of sampling. Mitigation undertaken if fibres detected above 0.001f/ml. Is this possible in an external environment? **Depends – not going to catch the asbestos as after the fact – would only be evidence of some other problem likely fibrous asbestos has slipped through. What is the mitigation proposed? Asbestos fibre limit of detection = 0.001 fibres/ml according to the ambient monitoring method we specify, so must be achievable. They're basically saying if they detect anything they'll apply (unspecified) mitigation.**

Boundary monitoring has a detection limit of 0.0005f/ml again is this something we could rely on outside? **Not sure – seems low. Maybe better techniques used now? Chris are you aware of lower LOD methods?**

The monitoring plan referenced shows a couple of monitoring location on each treatment pad. This will need further clarification as previously FCC confirmed asbestos operations would be mobile from one pad to another with no dedicated location. This document now confirms asbestos storage and processing will be on a dedicated pad. **Monitoring has to be flexible as it is dependant on the wind direction. Upwind sampling is needed to establish without doubt the source. They possibly need to specify several of locations around the process, but not necessarily monitor all of them on a particular run. Minimum they should cover the directions of sensitive receptors – I can't remember if there were any close here.**

Picking station and screener

Is the proposed screener in line with the proposal at Rowley Regis? **Chris – as above**

The screener is now enclosed with monitored HEPA filter. Hopefully diffuse emissions from the activity could be avoided. My concern however is that asbestos pieces will be broken by the agitation. The output soils will then be discharged into the picking station. **They will be within the abated screener, so free fibres produced should be abated. Some abrasion is likely in any handling. Also we have permitted this at Rowley as long as it is enclosed and abated, so I don't think we can backtrack here for this.**

As previously detailed this is a mobile unit with windows and flimsy cover. I would consider without screening this could be OK based on the fibre content of the soils at Waste Acceptance. Now however I'm concerned these soils will have a higher fibre load due to passing through the screener. **Again – we have accepted this arrangement in principle at Rowley – they say this is the same design.**

The input and output conveyors are uncovered with water suppression provided by spray rail – don't think this is enough. **Input covered prior to spray rail seems BAT to me. Outward too? Chris?**

My thoughts

Based on the WAP limits for fibres within the soil we could potentially permit the hand picking activity. Without the agitation of screening the methods proposed seem robust enough to prevent asbestos pieces breaking and fibre emissions unlikely.

For the reasons stated above I think the screening still doesn't meet BAT because it will increase the fibre load of the soil which would then be released by use of open conveyors, handpicking, dropping into storage piles. **As per above we've accepted it at Rowley provided it is adequately enclosed and abated – can we go back on it now?**

Any thoughts you have would be gratefully received and how this might fit into the use of the screen at Rowley Regis.

Kind regards

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

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Grange, Adam

From: Dunmore, Katie
Sent: 19 November 2021 11:55
To: Roberts, Claire
Subject: FW: FCC Feedback

Hi Claire,

Below are my comments to Sam.

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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From: Dunmore, Katie
Sent: 19 November 2021 11:41
To: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>
Subject: RE: FCC Feedback

Hi Sam,

Daneshill Landfill, EPR/NP3538MF/V009 is FCC. They have applied to operate a soil treatment facility within the boundary of the existing landfill. The propose to treat hydrocarbon impacted wastes by bioremediation and treat asbestos contaminated soils by mechanical screening and handpicking. These soils may than go onto bioremediation. Treated soils will be used for restoration at the landfill.

It would be really useful if Claire could discuss with FCC the issues we having permitting this site and ultimately that they are talking themselves into a partial refusal. I don't have a contact at FCC, I've dealt with their consultants [REDACTED] at Caulment. I'm not sure if the issues lie with them or the operator but from my conversations with both [REDACTED] they do not recognise the potential risks from the activities and when I ask for clarification on a point they don't know the answers, referring back to FCC and taking weeks to respond.

I've tried to keep it brief but there a quite a few issues. FCC are experienced in the activities applied for. Their application however did not meet BAT, the documents were extremely vague and a 46 point Schedule 5 was required from the off. I explained our requirements in detail the their consultants. The Schedule 5 also contained explanations.

The Schedule 5 was not satisfied. They answered the questions but detail was not provided. I have issued several RFIs trying to tease this information out. Fundamentally the major issue is that rather than providing an explanation of how activities meet BAT supported with explanations they dismiss the risks, provide no mitigation in terms of contained stockpiles, covered equipment, sealed buildings (or whatever they see fit). They propose limited monitoring so there will also be no real assurance that activities are not giving rise to emissions.

Their responses in many instances refute our concerns by referencing other sites particularly Edwin Richards Quarry where they state asbestos fibre monitoring has never picked up an issue. For instance I asked how the water system would capture asbestos fibre, they stated - *Water monitoring from asbestos processes has not detected fibres ...no abatement in effluent is required.*

When asked about containing and capturing emissions from picking operations. They referenced monitoring at Edwin Richards again whilst offering only normal dust suppression as mitigation here.

They make blanked statements that the soils do not pose a risk to human health when compliance testing has been carried out.

We can't permit on assurances that they haven't had issues in the past. It should be noted that activities at Edwin Richards are fully enclosed within a sealed building with tight monitoring. There is no risk to the local environment or community.

We accept that compliance sampling will show the soils are non-hazardous for asbestos. We however consider there is significant risk that treatment by handling, dropping, screening, agitating soils containing cement bounded asbestos (which we consider friable when weathered –they don't) may release fibres into the soil and air. This is fundamentally not addressed in the application.

On a separate note. FCC are currently refusing to provide any response to the Schedule 5 question regarding the asbestos soil screening activity whilst they dispute a pre-op at Edwin Richards . As far as I'm aware there is no formal appeal. My understanding here is that if they want to screen at Edwin Richards they must undertake this in an entirely sealed machine with HEPA or similar filtration. They agreed with the pre-op but are now saying monitoring of the screen provides sufficient data to prove there is no risk.

Considering FCC know our requirements for these activities the fact they have put in such a poor application and provide challenging responses is frustrating. [REDACTED] dismissed my concerns in the early stages liking the works to mobile plant. They are talking themselves into a refusal.

FCC have really shot themselves in the foot constantly referencing Edwin Richards. As you know we had 66 objections from our consultation. Many of which have read the Edwin Richards permit and applications docs and also question why this location is not similarly protected.

A number of the local comments raised historic issues with the site in terms of unsheeted vehicles access the site, waste tipped on roads, generally not being a good neighbour. This coupled with FCCs attitude gives us no leeway to give them any in terms of trying something slightly different because we have no confidence they respect the risks.

I did speak to [REDACTED] yesterday and was quite frank, raising the comments from residents and confirmed the asbestos activity would be refused based on the information currently submitted. I mentioned a further Schedule 5 may be issued but I'm not sure what more I could ask.

Kind regards

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

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From: Haddock, Samantha

Sent: 17 November 2021 08:58

To: Alexander, Mike <mike.alexander@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Grills, Rachael <rachael.grills@environment-agency.gov.uk>; Haines, Thomas <Thomas.Haines@environment-agency.gov.uk>; Lythgo, Kirstie <Kirstie.Lythgo@environment-agency.gov.uk>; Miller, Stuart <Stuart.Miller1@environment-agency.gov.uk>; Morris, Chris <chris.morris@environment-agency.gov.uk>; Pople, Emily <emily.pople@environment-agency.gov.uk>; Smith, Jennie <Jennie.Smith@environment-agency.gov.uk>; Barker, Paul <paul.e.barker@environment-agency.gov.uk>; DiStefano, Francesco <Francesco.DiStefano@environment-agency.gov.uk>; Giles, Ruth <Ruth.Giles@environment-agency.gov.uk>; Hann, Louise <louise.hann@environment-agency.gov.uk>; Hunt, Simon <Simon.Hunt@environment-agency.gov.uk>; Palmer, Clara <Clara.Palmer@environment-agency.gov.uk>; Pemberton, Emma <emma.pemberton01@environment-agency.gov.uk>; Tearle, Jess <Jess.Tearle@environment-agency.gov.uk>; Walker, Jake <Jake.Walker@environment-agency.gov.uk>; Wycherley, Miranda <miranda.wycherley@environment-agency.gov.uk>

Subject: FCC Feedback

Morning all

I know a number of people have FCC applications on at the moment.

Claire Robert has an account manager meeting with them on the 1st of December so if you have any feedback, positive or negative, or issues you would like her to raise please provide me with:

- Permit number
- Site name
- contact at FCC
- Detail
- outcome needed (if any)

Please send these to me by Wednesday 24th November

Thanks

Samantha Haddock

Permitting Team Leader (Bristol Installations)

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

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

Please note I don't work on Thursdays.

samantha.haddock@environment-agency.gov.uk

External: 02030 254710

Mobile: 07796997145

Grange, Adam

From: Jones, Rhidian
Sent: 15 August 2022 11:42
To: Dunmore, Katie
Subject: FW: FCC permit variation

Hello Katie,

Sorry I was incorrect. There is no call booked today to discuss Daneshill. I need glasses to read my own calendar!

From: Jones, Rhidian
Sent: 15 August 2022 09:50
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: FCC permit variation

Morning,

Mel has booked in a brief call at 13.30 today to chat about this.

Rhidian

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 15 August 2022 09:41
To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>; Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Cc: Bird, Jamie <Jamie.Bird@environment-agency.gov.uk>
Subject: RE: FCC permit variation


Hi Rhidian,

Yes, my diary is relatively free this week.

Kind regards

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

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From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>

Sent: 12 August 2022 12:23

To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Bird, Jamie <Jamie.Bird@environment-agency.gov.uk>

Subject: FCC permit variation

Hello both,

Do you want to book a time next week to discuss the FCC permit variation for Danes Hill landfill site and soil treatment activities?

Martin Turner has been involved in this and I am moderately familiar with it, but Martin is on leave for 2 weeks so I am happy to step in from an East Mids perspective.

Regards

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

Grange, Adam

From: Bischer, Mel
Sent: 23 August 2022 16:15
To: Dunmore, Katie
Subject: FW: HPI form for Danes Hill
Attachments: HPI form - Daneshill Landfill variation AEM signed.docx

Hi Katie

Here you go. I have added my name to this too, as I would sign a permit.

As per Rhidian's email, the area are working up the comms for the minded to consultation. When we're happy we've got completed the draft decision, we will need to liaise with IPS to get this advertised on citizen space – ensuring alignment with any area comms.

Happy to chat.
Mel

Mel Bischer CMgr MCMI
Principal Permitting Team Leader, National Permitting Service
Environment Agency | Horizon House, Deanery Road, Bristol BS1 5AH

melanie.bischer@environment-agency.gov.uk
Mobile: 07771 387706

Say my name (phonetic spelling): *Mel Bih-shuh*

Pronouns: she/her ([why is this here?](#))

[No need to thank me](#)

Working days: Monday to Friday



Incident management role: (Duty) National Base Controller



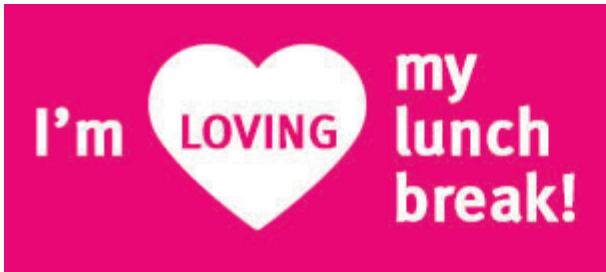
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to reach their full potential in the workplace.



I've pledged to try and make the most of my lunch break to help boost my wellbeing.

#loveyourlunchbreak

From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>

Sent: 23 August 2022 15:06

To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>

Subject: RE: HPI form for Danes Hill

This is the one you want.

All signed by the AEM.

I have contacted comms and engagement to work out a plan. If I need anything I will give you a call.

Thanks

Rhidian

From: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>

Sent: 23 August 2022 15:02

To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>

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

Subject: RE: HPI form for Danes Hill

Hi Rhidian

That's great, but the attached form doesn't appear to be signed my end.

Assume that you are working up the appropriate comms to notify stakeholders too.

Thanks

Mel

Mel Bischer CMgr MCMI

Principal Permitting Team Leader, National Permitting Service

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

melanie.bischer@environment-agency.gov.uk

Mobile: 07771 387706

Say my name (phonetic spelling): *Mel Bih-shuh*

Pronouns: she/her ([why is this here?](#))

[No need to thank me](#)

Working days: Monday to Friday



Incident management role: (Duty) National Base Controller



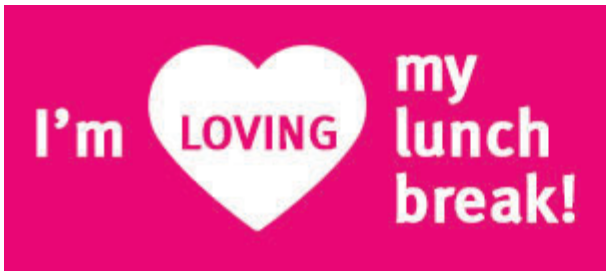
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the most of my lunch break to
help boost my wellbeing.

#loveyourlunchbreak

From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>

Sent: 23 August 2022 14:05

To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>

Subject: HPI form for Danes Hill

Hello Mel,

Please see attached the signed HPI form for Danes Hill landfills site.

Regards,

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

Grange, Adam

From: Dunmore, Katie
Sent: 27 January 2022 09:36
To: Tucker, Tania
Subject: FW: Off-spec compost 19 05 03 as a biofilter

Hi Tania,

Following on from my email below. Are you available to have a call regarding the use of the CLO bio filter?

Kind regards

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

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mob: 07584 369561
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From: Dunmore, Katie
Sent: 10 January 2022 09:26
To: Tucker, Tania <tania.tucker@environment-agency.gov.uk>
Subject: RE: Off-spec compost 19 05 03 as a biofilter

Hi Tania,

I'm just checking in with this and wondering whether the permitting process is actually the right route to authorise the use waste EWC 19 05 03 as a filter medium?

I'm concerned we could be stuck with a protracted assessment which could be avoided if the operator installs a standard non-waste filter medium. Given the operators evidence is based upon unpermitted operations and the high level of scrutiny authorising this activity will require should the assessment be dealt with by yourselves outside the permitting process? If authorised permit variations would then be required and/or compliance dealt with separately.

From the information presented so far and discussions with the applicants consultant it appears their evidence for the wastes efficacy is based upon monitoring data from what they state is a similar filter already operating at Rowley Regis. The AQA assessment provided is based on this data but does not contain information on source term, emissions concentrations or emissions rates. There doesn't seem to have been specific characterisation of the gas streams.

This assessment only covers human health impacts of the four main VOC's. The OMP is lacking any detail of nuisance impacts from the filter and there is no information provided on bio aerosols.

Bio filter aside, this application has many non-standard operating techniques proposed which are leading to a challenging determination. I'm trying to gain control by considering what should and should be included in our assessment. The application has attracted a lot of local interest and a lot of these concerns draw attention to historic

nuisance and the site not being a good neighbour. This doesn't lend itself to allowing non-standard activities to run under temporary evidence gathering conditions.

Considering this could you consider if the filter medium could be assessed outside of this process by yourselves. Alternatively if we do need to consider it now would you be able to provide a list of questions I could work into a Schedule 5 request? If we do push back the assessment we would need to provide an outline of information requirements.

It would be useful to chat this through. Are you free Wednesday morning? I have a call at 11 -11.30 but aside from this I'm free.

Kind regards

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

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From: Tucker, Tania
Sent: 30 November 2021 08:16
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
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Hi Katie

I have contacted my colleagues re the proposed biofilter. Some useful comments below. Regards Tan

Tania Tucker
E&B Senior Advisor (Non-hazardous & inert waste sector lead)
Environment Agency

tania.tucker@environment-agency.gov.uk
External: 020 302 56785 | Mobile: 07778050209
Working days: Monday to Friday



From: Siddle, Sophie
Sent: 29 November 2021 16:57
To: Nicholls, Kathy <kathryn.nicholls@environment-agency.gov.uk>; Tucker, Tania <tania.tucker@environment-agency.gov.uk>
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I've put some other comments below in green, mainly agreeing with Kathy's comments.

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Tania Tucker

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Environment Agency

tania.tucker@environment-agency.gov.uk

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Working days: Monday to Friday



Grange, Adam

From: Dunmore, Katie
Sent: 07 December 2021 13:59
To: Alexander, Mike
Subject: FW: Off-spec compost 19 05 03 as a biofilter
Attachments: 3982-CAU-XX-XX-RP-V-0308.A0.C2 OMP Final.pdf

Hi Mike,

Below are E&B's comments on FCC's biofilter. Can we talk about this on Thursday?

I'd like to assess FCC's AQ assessment which they state is based on emissions monitoring at Edwin Richards CLO filter but not sure how to. I've attached the OMP, the AQ assessment is at the back.

It seems another spanner in the works of making a clear cut decisions. In this case I feel like we can't ignore the evidence the CLO filter may work. However the evidence is based on unpermitted technology.

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
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From: Siddle, Sophie

Sent: 29 November 2021 16:57

To: Nicholls, Kathy <kathryn.nicholls@environment-agency.gov.uk>; Tucker, Tania <tania.tucker@environment-agency.gov.uk>

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I'd be interested to know how they are going to 'specifically produce' the biofilter medium. A good biofilter medium has uniform particle size, is homogenous with good porosity. Generally oversize contains a mix of hard/soft woods, possibly some treated wood etc. Also if they need to screen to a smaller size to remove plastics etc they risk creating a finer material losing porosity and compaction can also occur. This will depend on their processing techniques and could be an expense they are initially trying to bypass by offering it as a biofilter medium.

I agree with Kathy's point about characterising the gases first before determining the design and dosing procedure. Has this been done? We would need to know what they are remediating at the STP, what gases are produced, and therefore to be treated, and what is the most effective way to do this. This should be backed up with data.

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Grange, Adam

From: Hall, Chris
Sent: 11 November 2021 11:27
To: Murray, John; Dunmore, Katie
Cc: Raynes, Graham; Hadley, Richard
Subject: RE: Asbestos soil treatment best practice guide

I don't know of any others.

From: Murray, John
Sent: 11 November 2021 11:25
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Hadley, Richard <richard.hadley@environment-agency.gov.uk>
Subject: RE: Asbestos soil treatment best practice guide

Thanks Chris

Interesting that they doing it outside.. At least with the Tetron site its all done inside a building.

Apart from Duntons (Treatment in dedicated enclosed and abated picking cabin – what ever this is ??) do we have any sites where asbestos screening done outside without enclosure.

Regards

From: Hall, Chris
Sent: 10 November 2021 14:59
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Hadley, Richard <richard.hadley@environment-agency.gov.uk>; Murray, John <john.murray@environment-agency.gov.uk>
Subject: RE: Asbestos soil treatment best practice guide

Katie

At the very least the screener will need to be enclosed. See my discussions with Clive Wall about his permit.

All the treatment at Edwin Richards is inside. It appears that each permit application is a new step to trying out something mostly the same but a bit different – hence outside treatment. The operator has no experience of screening and fibre release so they only have experience of hand picking which should also be in a building. Don't be afraid of refusing if the goal posts have moved yet again. Check to see if they are asking for picking of asbestos off the floor – at least one operator wanted to do this but we stopped them.

I don't think we can refuse simply because they don't have a landfill onsite to take the waste – we permit standalone operators with no landfill for asbestos picking – Dunton's for example. Dunton handpick outside by the looks of it but "in a dedicated enclosed and abated picking cabin."

Chris

From: Dunmore, Katie
Sent: 10 November 2021 14:41
To: Hall, Chris <chris.hall@environment-agency.gov.uk>
Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: RE: Asbestos soil treatment best practice guide

Thanks Chris,

This is the document I was after.

Daneshill is proving quite tricky to permit. Asbestos operations seem disordered. There is no dedicated location for the asbestos activities with storage, screening and picking to be located across all treatment areas including pads marked for bioremediation. I will drill down into the operators reception and segregation procedure but this approach just don't seem like a good idea. Hence why I was looking for the guide.

The operation relies on reception sampling for fibres present in the soil. There's abatement in terms of water suppression but this ultimately wont capture fibres if released by loading shovels, dropping and agitation of the cement. I'm concerned fibres could persist at the site. If problems did occur I don't see how these would be picked up. This is an outdoor operation with a couple of monitoring locations, one at the screener and one outside the picking booth. Operatives will not wear personal pumps. The operator has provided monitoring data taken from Edwin Richards quarry which they state evidences fibre emissions have never been detected above 0.0005f/ml. This doesn't remove the risk here though. In addition we've received some well-considered public comments along these lines. Some more technical ones I'm struggling to counter.

I've discussed this with my team and the general thought is that asbestos activities should be refused. This seems tricky considering the activities you mention and that the operators activities at Edwin Richards.

On a separate note, Daneshill doesn't have a stable non-reactive cell. Remediated soils will be use in restoration but asbestos pieces will be transported for disposal to another site approximately 40 miles away. I'm awaiting detail as to how its transported. Is triple handling itself an issue? Previously I've seen disposal at the treatment site too.

Kind regards

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

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Subject: FW: Asbestos soil treatment best practice guide

Katie

You may be referring to the attached. I started a specific guidance note for soil treatment and appropriate measures but I have been involved in permit review and that work is my only real focus at the moment so the specific guide will have to wait. Since we first started looking at soil remediation where the soil was impacted with asbestos fragments the situation has become more complicated. We have a site permitted for screening of asbestos albeit we are in dispute with them over the enclosing of the operation for dust and asbestos fibre emissions abatement and we have a site that wants to wash soils impacted with asbestos fragments – this permit is still being written but we are adding in a clause “The washing of asbestos impacted wastes shall not increase the asbestos fibre load in the waste” because we have concerns that the washing process designed to fractionate the soil into heavy, medium and fine fractions will put asbestos fibres from the cement into the soil/stones matrix..

Our latest ideas regarding dual coding is to make the dual coding one entry in the permit for example:

| 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*and 17 06 05* | 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 05 04 and 17 06 05* | 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)) |

This clearly shows that the one waste has to be dual coded.

This is still an evolving process but I do not have time at the moment to devote to it.

If you have a particular site permit in mind, for example you were dealing with the Daneshill Landfill site, then Graham Raynes and I can talk you through it..

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

☎ **02030 251169**

I work Monday to Thursday

From: Dunmore, Katie
Sent: 09 November 2021 16:34
To: Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: Asbestos soil treatment best practice guide

Hi Chris,

A couple of years ago you forwarded me a couple of documents on asbestos transfer and treatment. One was the storage and transfer quick guide available on the Intranet another was a short document relating to best practice focused on soil treatment sites – informal BAT. I can't find this second document, It may not have been published. If you can think of the one I mean do you have a copy?

Kind regards

Katie Dunmore
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Grange, Adam

From: Lythgo, Kirstie
Sent: 29 March 2022 16:29
To: Dunmore, Katie
Subject: Peer review sign off - Daneshill Landfill, FCC Recycling (UK) Limited

| | |
|--|----------------------------|
| Applicant: | FCC Recycling (UK) Limited |
| Site name: | Daneshill Landfill |
| Application Ref: | EPR/NP3538MF/V009 |
| Application Type: | Substantial variation |
| Date of 'Sign Off': | 29/03/2022 |
| I have reviewed all permitting documents in line with appropriate regime specific check lists. | |
| Peer Reviewer Name: | Kirstie Lythgo |

Grange, Adam

From: Dunmore, Katie
Sent: 16 September 2021 10:27
To: Turner, Martin
Subject: Potential HPI. Daneshill Landfill proposed STF
Attachments: INTERNAL GUIDANCE Deciding if an application is HPI (2).docx

Hi Martin,

I've attached a HPI crib sheet to help consider if you think Daneshill should be HPI and area engagement guidance. The final decision should lie with your AEM with agreement from my PPTL – Samantha Haddock who is aware of the application.

[Engagement Guidance - All Documents \(ea.gov\)](#)

Points to pick out from the guidance to ensure the application (not the site) is HPI.

High public interest applications

We decide whether an application is of high public interest on a **case-by-case basis**.

To reach our decision we **consider all the relevant information**, including:

- whether the interest relates to issues regulated under an environmental permit
- the breadth and scale of interest – for example, the number of different sources such as individuals, interest groups, businesses, local councillors, media and whether there is ongoing engagement from the local MP
- whether the interest is, or is likely to be, sustained for a period of time

An application can become high public interest at any stage. **We review our decision if circumstances change.**

When we decide an application is high public interest, **we tailor our consultation to the particular circumstances.**

For bespoke permit applications and changes (variations), we **may** do one or more of the following:

- consult for more than 20 working days
- publicise more widely, for example public drop-in events, press releases, social media and adverts
- consult on the draft permit or notice and the draft decision document

So far we have received 33 public and an MP's response to our standard Gov.UK advertisement. One particular resident spoke to me last week and was very concerned that there is a strength of feeling in the village and she is encouraging other to write. She requested the consultation timeframe be extended partly because some were not computer literate and needed longer and also that the ad coincided with the school hols/ bank holiday etc.

We have agreed this. The portal for responses is now open until 23/09/2021. I have also reassured her that we will accept representations up until the determination date via email and post. Once the portal is closed contact details remain visible. She seems satisfied with this. I believe she wanted reassurance that we weren't closing the door to residents expressing their opinions up until determination.

<https://consult.environment-agency.gov.uk/psc/dn22-8rb-fcc-recycling-uk-limited>

This may now be enough but obviously want to make you aware of the interest and consider if a comms plan should be implemented.

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
📧 katie.dunmore@environment-agency.gov.uk

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Grange, Adam

From: Wall, Clive
Sent: 11 October 2021 09:20
To: Dunmore, Katie; Hall, Chris
Cc: Hadley, Richard; Murray, John
Subject: RE: Asbestos soil screening and hand picking st Daneshill Landfill site

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Environment Agency | Sentinel House, 9 Wellington Crescent, Fradley Park, Lichfield, WS13 8RR

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Subject: RE: Asbestos soil screening and hand picking st Daneshill Landfill site

There is a risk of increasing the asbestos into the soil and John Murray has put in a clause into his draft permit for washing asbestos impacted soils that says:

“The washing of asbestos impacted wastes shall not increase the asbestos fibre load in the waste.”

We could use this clause in your permit thus: “The screening of asbestos impacted wastes shall not increase the asbestos fibre load in the waste.”

They can then analyse for asbestos fibre content in the pre- and post- treated waste to check that they are not increasing the fibre content – this would be a breakdown in the treatment process if it is.

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FCC's response leans heavily on emissions monitoring carried out at Rowley Regis which states that dust sampling without suppression shows results below 0.0005f/ml or 0.01f/ml. Their response can be summarised to - they don't need mitigation such as enclosed buildings/equipment or specific handling techniques because fibres will not be present as evidenced by the monitoring appended to their response.

I don't quite know how to take this response as I had extensive discussions with their consultant when the schedule 5 was issued. I stated that we had significant concerns (screening aside) about dropping from height, agitation from conveyors etc and the potential to break asbestos cement. Where would we stand with this if they consider they are providing evidence operations do not lead to fibre release?

Similarly they had dropped the amount of monitoring here compared to other sites. There's no personal operative monitoring proposed with only two fibre monitoring points in the vicinity of the

screen and picking station. Given this is outside and open to all weathers could this ever give reliable results?

I have spoken to Richard briefly regarding the screener pre-op at Rowley Regis. FCC won't provide any further information to me on my screener until discussions have concluded with the Rowley Regis pre-op. I understood it had been left that we weren't discussing it, that they needed to comply or they can't have it. Have there been further developments with this?

I had initially said I would refuse the screener on my site on my site if they didn't respond to the Schedule 5 but FCC seem very set that we are about to agree something at Rowley Regis. Any info would therefore be greatly received.

Kind regards

Katie Dunmore
Permitting Officer
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From: Hall, Chris

Sent: 10 November 2021 09:26

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

Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: FW: Asbestos soil treatment best practice guide

Katie

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Environment & Business

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 I work Monday to Thursday

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Permitting Officer

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

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Grange, Adam

From: Dunmore, Katie
Sent: 11 November 2021 14:52
To: Raynes, Graham
Subject: RE: Asbestos soil treatment best practice guide
Attachments: Copy of Asbestos Sites.xlsx

Hi Graham,

I've added the Daneshill application to the spreadsheet attached.

The Biffa Redhill Landfill I permitted couple of years ago also used a portakabin for outside works. Biffa however had a dedicated stockpiling and treatment area with detailed working methods for soil movements and decontamination. Stockpiles and conveyers were covered and I don't think hoppers were used.

Redhill and Daneshill are very similar in terms of location and distance to receptors. The Biffa application did acknowledge the potential risk areas and provided specific mitigation at these points whereas FCC dismiss the risk based on historic monitoring data.

Kind regards

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Sent: 11 November 2021 11:30
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Cc: Hadley, Richard <richard.hadley@environment-agency.gov.uk>
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Sent: 10 November 2021 15:45
To: Hall, Chris; Dunmore, Katie
Cc: Hadley, Richard; Murray, John
Subject: RE: Asbestos soil treatment best practice guide
Attachments: Asbestos Sites.xlsx

Hi Katie,

Do you want to have a chat to go through the permitting issues? Happy to help you with it.

It would be good to know exactly what they are doing – could you put a line in the attached spreadsheet? Trying to capture what is proposed because every operator tries something different.

Best Regards

Graham

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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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From: Hall, Chris
Sent: 10 November 2021 09:26
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: FW: Asbestos soil treatment best practice guide

Katie

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| Waste code | Description |
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Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

 **02030 251169**

I work Monday to Thursday

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Sent: 09 November 2021 16:34
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Subject: Asbestos soil treatment best practice guide

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Grange, Adam

From: Dunmore, Katie
Sent: 10 November 2021 15:44
To: Hall, Chris
Cc: Raynes, Graham; Hadley, Richard; Murray, John
Subject: RE: Asbestos soil treatment best practice guide

Hi Chris,

The applicant is not responding to queries regarding the screener at present, stating they are waiting our decision on their monitoring data at Edwin Richards. I'm therefore just considering the asbestos picking. This will be undertaken within a raised booth with conveyer belt. It's a mobile unit with weather covering but there's no proposal for formal enclosure, mitigation of monitoring in the booth. All soils are stored outside uncovered.

The operator is handling and treating these soils as if it were a non-hazardous aggregate facility. Justification relies on the soil matrix being non-hazardous for asbestos and they don't acknowledge treatment could break asbestos cement. This is the reason we are considering refusal.

I've not had these discussions yet with the operator, we're a way off but as it stands I have no mitigation to put in a Decision Document to support issue.

Kind regards

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From: Hall, Chris
Sent: 10 November 2021 14:59
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Hadley, Richard <richard.hadley@environment-agency.gov.uk>; Murray, John <john.murray@environment-agency.gov.uk>
Subject: RE: Asbestos soil treatment best practice guide

Katie

At the very least the screener will need to be enclosed. See my discussions with Clive Wall about his permit.

All the treatment at Edwin Richards is inside. It appears that each permit application is a new step to trying out something mostly the same but a bit different – hence outside treatment. The operator has no experience of screening and fibre release so they only have experience of hand picking which should also be in a building. Don't be afraid of refusing if the goal posts have moved yet again. Check to see if they are asking for picking of asbestos off the floor – at least one operator wanted to do this but we stopped them.

I don't think we can refuse simply because they don't have a landfill onsite to take the waste – we permit standalone operators with no landfill for asbestos picking – Dunton's for example. Dunton handpick outside by the looks of it but "in a dedicated enclosed and abated picking cabin."

Chris

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Grange, Adam

From: Hall, Chris
Sent: 10 November 2021 14:59
To: Dunmore, Katie
Cc: Raynes, Graham; Hadley, Richard; Murray, John
Subject: RE: Asbestos soil treatment best practice guide
Attachments: RE: Soil Treatment Facility; HP3403BL Dunton permit 2021.docm

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Grange, Adam

From: Hall, Chris
Sent: 22 November 2021 13:40
To: Dunmore, Katie
Cc: Raynes, Graham
Subject: RE: Asbestos soil treatment best practice guide
Attachments: Soil treatment draft S1.6 November 2021.docx

Katie

I notice I got my cut and pasting wrong in the descriptions below they should read:

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| 17 | Construction and demolition wastes (including excavated soil from contaminated sites) |
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I fixed the soil treatment permit outline draft as attached above. It needs more work but I have no time at the moment.

Dr Chris Hall
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Grange, Adam

From: Wall, Clive
Sent: 15 February 2022 11:54
To: Dunmore, Katie
Subject: RE: Bio filter operation at Edwin Richards Quarry

Hello Katie,

Sorry for delayed response. I'm certainly not aware of them using waste compost as a bio filter medium. I'm pretty sure they said it was a wood medium filter in their application. I cant see anything in the permit that allows the construction of the biofilter from waste.

It is correct we don't get any odour issues however.

As regards asbestos soils screening, we have permitted this subject to a pre-op report. They have had 2 submissions and we have rejected both, so they cant do this at the moment.

Clive

Clive Wall

PPC Compliance Officer | West Midlands Area

Environment Agency | Sentinel House, 9 Wellington Crescent, Fradley Park, Lichfield, WS13 8RR

Contact | Mob: 07710 903407 | **Ext:** 02030252966 | **Int:** 32966 | **Email:** clive.wall@environment-agency.gov.uk
www.gov.uk/environment-agency

Incident management standby roles: EM Site Controller | EM Duty Officer



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From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 09 February 2022 17:02
To: Wall, Clive <clive.wall@environment-agency.gov.uk>
Subject: Bio filter operation at Edwin Richards Quarry

Hi Clive,

I believe you are the local officer for the above site? I was wondering if you had 5mins for a quick chat regarding operations at the site.

I'm a PO dealing with an application from FCC to undertake bioremediation and asbestos picking/screening at Daneshill Landfill in Nottinghamshire. The applicant makes reference to operations at Edwin Richards as a template for their proposed new operation and has also provided emissions data from Edwin Richards.

The issue I have is FCC want to use waste compost EWC 19 05 03 as a bio filter medium. We have major concerns about this and it not something we would consider BAT. FCC however have confirmed they use this medium at Edwin Richards and several other sites. They have provided monitoring data from Edwin Richards which confirms VOC PCs set against human health standard are negligible. They state there are no issues with odour at Edwin Richards. Is this the case?

There are many reasons E&B are unhappy permitting waste materials as filter media but it's also harder to push back if Edwin Richards is ticking along nicely. Could you let me know if there are any concerns at your site?

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
📧 katie.dunmore@environment-agency.gov.uk

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Grange, Adam

From: Hall, Chris
Sent: 19 May 2022 09:25
To: Raynes, Graham; Dunmore, Katie
Cc: Chesney, Pete
Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham thanks again.

I find the whole thing quite maddening. I am confused that soil washing which is a wet process has a dust monitoring requirement but biological treatment of soil which is a dry process does not. It is also odd that the mandatory monitoring for soil treatment is odour or NH₃/H₂S when only one of our existing permits includes this.

It would be unfortunate that we had less control over emissions after the permit review than before. I would be loath to remove too much monitoring for those sites that already have it but it would be good to get consistency across every site doing soil treatment. Not sure it is worth monitoring for each of TVOC TPH, BTEX, PAHs and TVOC 15 but it is worth getting all sites to monitor for TVOC and speciated VOCs to give us some consistency across each site.

This is a suggestion for emission limits for biological soil treatment. Could be run past the monitoring/emissions experts.

| Emission point ref. & location | Source | Parameter | Limit (incl |
|---|---------------------------------|---|--|
| Description of the emission point including its abatement Example: Soil treatment biofilter as shown on the layout plan in Schedule 7 as A1. | Soil treatment filter biofilter | Odour (Note 1) | 1000 ouE |
| | | H ₂ S (Note 1) | No limit s |
| | | NH ₃ (Note 1) | 20 mg/m ³ |
| | | Total volatile organic compounds (TVOC) | No limit s |
| | | Speciated VOCs | Limit cont immediat OR Limit cont done from condition |

| | | | |
|--|--|---------------------------|------------|
| | | Particulate Matter (Dust) | No limit s |
|--|--|---------------------------|------------|

Note 1 The monitoring of NH₃ and H₂S can be used as an alternative to the monitoring of the odour concentration. [Do we le

* These standards are taken from biowaste treatment permit for Biogen [Biowaste Treatment Permit Review - Permit Issued](#)

Abatement combinations

- Adsorption
- Biofilter
- Fabric filter
- Thermal oxidation
- Wet scrubbing

Any help is welcomed – we need to bottom this out.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169

I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Sent: 18 May 2022 15:54

To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>

Subject: RE: Biofilter monitoring at Daneshill Landfill

Good spot – so this is definitely biological treatment but according to that table not MBT. It then refers to section 5.6 of the Bref, but that just leaves us up in the air as soil bioremediation isn't followed through into the BATCs – maybe they just gave up at that point?

So according to biological BATCs we should have for BAT-AELs:

NH₃ or odour

Plus any ELVs for other speciated contaminants in the inventory of emissions (e.g. Benzene if these are an issue (via usual H1 approach)).

And monitoring:

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H2S

Plus speciated VOC for any other ELV, subject to H1 etc.

No dust or TVOCs though with this though.

The only part of 5.6 (ignoring thermal desorption as it's so dissimilar) to get into the BATC is soil washing – perhaps use this as a guide too? That wouldn't include any more BAT-AELs, but would include Dust and TVOC monitoring under BAT8.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
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It specifically includes soil contaminated with oil (ex situ soil only).

We do end up with only the one effective mandatory BAT-AEL (H₂S/NH₃ or odour concentration). We can control the likely emissions from the process with emission limits - since we suspect dust and TVOC we monitor for them too and for dust shoehorn in a dust limit.

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Note Dunton Technologies, Liverpool was given the monitoring as if it were MBT.

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Plus monitoring for the above (NH3 or odour) and H2S.

MBT is defined as:

| | |
|---------------------------------------|---|
| Mechanical biological treatment (MBT) | Treatment of mixed solid waste combining mechanical treatment with biological treatment such as aerobic or anaerobic treatment. |
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Not looked at the Bref though not sure if this stretches the definition of MBT? To me it would seem a specialist sub category or it.

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We could say that this process is both “Biological treatment of waste” and “Physico-chemical treatment of solid and/or pasty waste” which would add in Dust but I think we can add in dust anyway.

We could say that this process is both “Biological treatment of waste” and “Physico-chemical treatment of waste with calorific value” and “Physico-chemical treatment of solid and/or pasty waste” which add in a mandatory 30 mg/m³ for TVOC.

I would like biological soil treaters to monitor for TVOC but we may not be able to set limits.

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There is no way to put TVOC through H1 – would have to use a proxy like benzene as a worst case. We can set limits on individual substance if H1 shows an issue. I would have to look at the rationale behind how we set those as I’m not too familiar – usually we take our limits from the sector guidance/ Bref if needed, so not sure how we would set a particular limits without those.

OK with dust limit.

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Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham, Katie

I agree that talking with Abraham would be helpful.

My thoughts:

We should base monitoring on the likely emissions from the process.

We should base the limits on the BAT-AETs first which will be mandatory. Then for the other emissions we should base the limit on whether it is necessary to control the emission. The H1 might be the mechanism to do this.

Thus for biological treatment of soils* (not really thought of it as a mechanical biological treatment as it is not put into a mechanical device that turns it or pressurises it – the forced air flow is more related to the abatement than the treatment), they need to monitor for **odour** but they can alternatively monitor for **H₂S** and **NH₃**.

If the contaminant in the waste is oil or other organics then monitoring for TVOC and speciated should be done – there is no mandatory AEL so we could set a limit based on the H1 (either based on real data or on data collected via an improvement condition to do the H1) which could even determine that there is no need for a limit?

We are always going to suspect that particulate matter (dust) could be an issue but again no mandatory BAT-AEL. Where a limit is given it is usually 5 mg/m³ so we could simply go with that as a starting point. Otherwise do we go with the H1 (either based on real data or on data collected via an improvement condition to do the H1)?

So:

| | | | | | | |
|---|---|------------------|--|--|-------------------|----------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | Limit contrived from H1 immediate OR Limit contrived from H1 done from improvement condition OR No limit set?? | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | | |

| | | | | | | |
|--|---------------------------|--|---|---|----------------|------------|
| | Odour | | 1000 ouE/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | EN 13725 |
| | Particulate Matter (Dust) | | 5mg/m ³ OR Limit contrived from H1 immediate OR Limit contrived from H1 done from improvement condition OR No limit set?? | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | EN 13284-1 |

* All biological treatment processes for hazardous waste must be actively controlled for emissions – there should be no passive venting of emissions.

What do you think?

I probably need to accelerate the outlines for each of the treatment processes given in the BAT conclusions but there are issues with each of them which are confounding matters.

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Sent: 17 May 2022 11:47
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Hi Katie,

Yes the Healthcare permit review was done first so the permit is in the correct format for the BATCs. Total and speciated VOCs are the 2 test methods mentioned in our MCERTS guidance so better than specifying BTEX or something like that.

NH3 is an analogue for odour – this process shouldn't be too odorous as there are primarily traces of oil in soil rather than a fully biodegradable process like composting.

Chris is working on the Chem waste template so I've copied him in – Chris have you given any thought yet to soil treatment? Looking at the process – should limits be based on those given in Table 6.7 for biological treatment of waste for this type of process? I would expect it fits into mechanical biological as it has forced air flow under suction? Has a slightly higher TVOC (40mg/m3) than phys-chem. Could do with your thoughts on how NH3, Odour and H2S fit into the picture. Maybe go with NH3 limit alone?

I think it would be worth sharing with Abraham for a biowaste view on limits and process monitoring for biofilters too.

Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

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Internal: **30600**

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

Sent: 16 May 2022 16:12

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: Biofilter monitoring at Daneshill Landfill

Graham,

I've revised the FCC soil treatment facility permit with your comments, many thanks for these. I'd just like to check I'm on the right track with the biofilter monitoring which I think may be subject to scrutiny.

I've included TVOC and speciated VOC as you suggest from the healthcare template. Why do we use the healthcare template? I see the limit is the same as that detailed for physicochemical treatment of waste with calorific value.. Is it adapted from that?

I've also include NH3 with the limit 20mg/m3. Odour is also mentioned but do we not include as adding NH3. H2S is also detailed as a requirement however is this unlikely to arise from the bioremediation process?

| | | | | | | |
|---|---|---------------|----------------------|---|----------------|--------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | 30 mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 |
| | NH ₃ | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |
| | Dust | | 5mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |

Kind regards

Katie Dunmore
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**Environment Agency
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Tel: 02030 251169

I work Monday to Thursday

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Sent: 17 May 2022 11:47

To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>

Subject: RE: Biofilter monitoring at Daneshill Landfill

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Kind regards

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

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Grange, Adam

From: Hall, Chris
Sent: 18 May 2022 14:16
To: Raynes, Graham; Dunmore, Katie
Cc: Chesney, Pete
Subject: RE: Biofilter monitoring at Daneshill Landfill

Table 4.1 in the BRef says:

Table 4.1: Biological treatments of waste

| Biological treatment | Brief description | Included in this document? |
|--|---|---|
| Aerobic treatment (including composting) | Biological decomposition of the organic content of wastes. Applied to solid waste, waste waters, bioremediation and to sludge and soil contaminated with oil. Composting consists of building piles of waste (windrows) to encourage the aerobic biodegradation of organic solids, producing a humic substance valuable as a soil conditioner or a growing media constituent. | See Section 4.2. Only <i>ex situ</i> bioremediation of contaminated soil is covered in this document (see Section 5.6) |

It specifically includes soil contaminated with oil (*ex situ* soil only).

We do end up with only the one effective mandatory BAT-AEL (H₂S/NH₃ or odour concentration). We can control the likely emissions from the process with emission limits - since we suspect dust and TVOC we monitor for them too and for dust shoehorn in a dust limit.

Looking at the existing permits we have some TVOC monitoring may not be a shock.

Note Dunton Technologies, Liverpool was given the monitoring as if it were MBT.

Dust is not universal in existing permits.

2 permits have no emissions monitoring at all.

| Operator | Site | Treatment Process or storage associated process | Description treatment |
|-----------------------------------|---|---|--|
| Biogenie Site Remediation Limited | Fawley Remediation Treatment and Recovery Facility - EPR/ZP3133RH | Biological treatment of waste | Bioremediation of hazar recovery. |
| Brett Aggregates Limited | Hithermoor Recycling And Recovery Facility - EPR/AB3006CE | Biological treatment of waste | Bioremediation of hazar recovery (S5.3) Bioremediation of non-h and recovery (S5.4) |
| Dunton Environmental Limited | Horseley Field Waste Treatment Facility EPR/BP3331DD | Biological treatment of waste | Ex-situ treatment of wa |

| | | | |
|-------------------------------------|--|-------------------------------|--|
| Dunton Technologies Limited | Ellesmere Port Waste Treatment Facility | Biological treatment of waste | Biological treatment of waste (enclosed biopiles, forced aeration) |
| Highfield Environmental Limited | Waste Treatment Facility at ICI (Teesport) No3 Landfill EPR/DP3531DS | Biological treatment of waste | Biological treatment - bioremediation of waste. Biological treatment - bioremediation of waste. |
| Keltbray AWS Limited | Mohawk Wharf Recycling Facility EPR/FP3092LH | Biological treatment of waste | Bioremediation of hazardous waste (not allowed too). Bioremediation of non-hazardous waste (not allowed too). |
| Mick George Ltd | Woodhatch Farm WTS EPR/EP3038VB | Biological treatment of waste | Biological treatment of waste and low VOC contamination. Biological treatment of waste and low VOC contamination. |
| Waste Recycling group (Central) Ltd | ERQ - STC, EPR/HP3632RP/V002 | Biological treatment of waste | Bioremediation process Bioremediation process Bioremediation process disposal. Bioremediation process recovery. |

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Kind regards

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

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Grange, Adam

From: Hall, Chris
Sent: 18 May 2022 11:23
To: Raynes, Graham; Dunmore, Katie
Cc: Chesney, Pete
Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham

The BAT conclusions are more tricky to negotiate than I would like.

If we say that biological treatment of soils is “Biological treatment of waste” then BAT is to monitor for H₂S/NH₃ or odour concentration in accordance with BAT 34 and Table 6.7.

We could say that this process is both “Biological treatment of waste” and “Physico-chemical treatment of solid and/or pasty waste” which would add in Dust but I think we can add in dust anyway.

We could say that this process is both “Biological treatment of waste” and “Physico-chemical treatment of waste with calorific value” and “Physico-chemical treatment of solid and/or pasty waste” which add in a mandatory 30 mg/m³ for TVOC.

I would like biological soil treaters to monitor for TVOC but we may not be able to set limits.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169
I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 18 May 2022 10:11
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
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Thanks Chris,

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OK with dust limit.

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graham.raynes@environment-agency.gov.uk

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

Sent: 16 May 2022 16:12

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: Biofilter monitoring at Daneshill Landfill

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Grange, Adam

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To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
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Katie Dunmore
Permitting Officer

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Grange, Adam

From: Turner, Martin
Sent: 11 October 2021 16:31
To: Dunmore, Katie
Cc: Haddock, Samantha; Smith, Heather
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi Katie

Thanks for your response - I will do though I'm not really sure what the question is?

Mart

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



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for people and wildlife



From: Dunmore, Katie
Sent: 08 October 2021 11:27
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Cc: Smith, Heather <heather.smith@environment-agency.gov.uk>; Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi Martin,

I don't believe we have had anything from the Parish Council although Bassetlaw District have provided the email attached. This is particularly relevant to our determination. MPs comments also attached.

The majority of the 60 response are from local residents who were alerted via word of mouth. The County Council initially alerted residents following on from the planning process.

I haven't gone through the responses in detail yet.

Is it worthwhile setting up a call with my TL regarding this? Just considering what the comms plan will be.

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
📧 katie.dunmore@environment-agency.gov.uk

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From: Turner, Martin
Sent: 08 October 2021 10:16
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Smith, Heather <heather.smith@environment-agency.gov.uk>
Subject: Daneshill asbestos treatment 8 Oct 2021

Hi Katie

I hope you are well

Thanks for your message - sorry for my delayed response as I have been off work – see attached - can you confirm whether there has been MP / Parish Council interest so I can complete the form.

Thanks

Martin

Martin Turner
Regulated Industry Officer
Environment Agency | Trentside Offices, Scarrington Road, West Bridgford,
Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk
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Working days: Monday to Friday



Grange, Adam

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Grange, Adam

From: Raynes, Graham
Sent: 17 May 2022 14:00
To: Dunmore, Katie
Subject: RE: Biofilter monitoring at Daneshill Landfill

Hi Katie,

No problem – sounds like we just take what we need for the biofilter if they don't want to be involved. Lets see what Chris thinks.

Graham

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 17 May 2022 13:49
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Thanks Graham,


I did speak to Abraham and Cathy Nichols earlier on in the permit determination, neither wanted to be involved passing it over to waste.

Everyone hated the CLO biofilter but couldn't come up with any ideas given the monitoring data provided. I'm therefore a bit nervous of getting others involved again at this stage. Hopefully Chris can provide further clarification or we go with the tighter TVOC. Hopefully it won't be an issue with the operator as they had proposed monthly monitoring of the previous parameters.

Kind regards

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Sent: 16 May 2022 16:12

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: Biofilter monitoring at Daneshill Landfill

Graham,

I've revised the FCC soil treatment facility permit with your comments, many thanks for these. I'd just like to check I'm on the right track with the biofilter monitoring which I think may be subject to scrutiny.

I've included TVOC and speciated VOC as you suggest from the healthcare template. Why do we use the healthcare template? I see the limit is the same as that detailed for physicochemical treatment of waste with calorific value.. Is it adapted from that?

I've also include NH3 with the limit 20mg/m3. Odour is also mentioned but do we not include as adding NH3. H2S is also detailed as a requirement however is this unlikely to arise from the bioremediation process?

| | | | | | | |
|---|---|---------------|----------------------|---|----------------|--------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | 30 mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 |
| | NH ₃ | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |
| | Dust | | 5mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |

Kind regards

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

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

mob: 07584 369561

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Grange, Adam

From: Dunmore, Katie
Sent: 17 May 2022 13:49
To: Raynes, Graham
Subject: RE: Biofilter monitoring at Daneshill Landfill

Thanks Graham,

I did speak to Abraham and Cathy Nichols earlier on in the permit determination, neither wanted to be involved passing it over to waste.

Everyone hated the CLO biofilter but couldn't come up with any ideas given the monitoring data provided. I'm therefore a bit nervous of getting others involved again at this stage. Hopefully Chris can provide further clarification or we go with the tighter TVOC. Hopefully it won't be an issue with the operator as they had proposed monthly monitoring of the previous parameters.

Kind regards

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

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

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From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 17 May 2022 11:47
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Hi Katie,

Yes the Healthcare permit review was done first so the permit is in the correct format for the BATCs. Total and speciated VOCs are the 2 test methods mentioned in our MCERTS guidance so better than specifying BTEX or something like that.

NH3 is an analogue for odour – this process shouldn't be too odorous as there are primarily traces of oil in soil rather than a fully biodegradable process like composting.

Chris is working on the Chem waste template so I've copied him in – Chris have you given any thought yet to soil treatment? Looking at the process – should limits be based on those given in Table 6.7 for biological treatment of waste for this type of process? I would expect it fits into mechanical biological as it has forced air flow under

suction? Has a slightly higher TVOC (40mg/m3) than phys-chem. Could do with your thoughts on how NH3, Odour and H2S fit into the picture. Maybe go with NH3 limit alone?

I think it would be worth sharing with Abraham for a biowaste view on limits and process monitoring for biofilters too.

Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

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Internal: **30600**

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From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 16 May 2022 16:12
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: Biofilter monitoring at Daneshill Landfill

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| Biofilter As shown on soil treatment activity | Total volatile organic compounds (TVOC) | STF biofilter | 30 mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
|---|---|---------------|----------------------|---|----------------|-------------|

| | | | | | | |
|------------------|-------------------|--|--------------------|--|-------------------|--------------|
| layout plan?? | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 |
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| | Dust | | 5mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |

Kind regards

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

From: Raynes, Graham
Sent: 17 May 2022 11:47
To: Dunmore, Katie; Hall, Chris
Subject: RE: Biofilter monitoring at Daneshill Landfill

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Graham Raynes

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Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

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From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 16 May 2022 16:12
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
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Kind regards

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Grange, Adam

From: Chesney, Pete
Sent: 19 May 2022 09:34
To: Hall, Chris; Raynes, Graham
Cc: Dunmore, Katie
Subject: RE: Biofilter monitoring at Daneshill Landfill

Sorry, catching up on all the emails!

It seems totally bizarre to not have monitoring and limits for TVOCs on biological treatment of soils – e.g. biopiles etc. I guess dust from the biological treatment process (biopiles etc.) is perhaps less likely to be a concern – dust would perhaps be more of an issue from the tipping/removal of the soil before and after the process, which I guess wouldn't be directed to the point source emission anyway – e.g. if they've not yet put in/or have removed the gas extraction pipes etc.

If they have any mechanical treatment before or after the biological process (crushing/screening etc.), presumably we could apply the mechanical/or mechanical-biological AELs to any emissions from these processes?

Can't we apply the BAT AELs for dust/VOCs anyway, even if they're not "mandatory BAT AELs" – i.e. as benchmarks emission limits, because we think they're appropriate and will ensure emissions are controlled/abated in line with BAT in general? Similar to the way we're looking to apply relevant BAT AELs to waste operations, or the way we've applied emission limits to healthcare facilities, even though (strictly speaking) no AELs directly apply from the BATCs?

Pete

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 19 May 2022 09:25
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham thanks again.

I find the whole thing quite maddening. I am confused that soil washing which is a wet process has a dust monitoring requirement but biological treatment of soil which is a dry process does not. It is also odd that the mandatory monitoring for soil treatment is odour or NH₃/H₂S when only one of our existing permits includes this.

It would be unfortunate that we had less control over emissions after the permit review than before. I would be loath to remove too much monitoring for those sites that already have it but it would be good to get consistency across every site doing soil treatment. Not sure it is worth monitoring for each of TVOC TPH, BTEX, PAHs and TVOC 15 but it is worth getting all sites to monitor for TVOC and speciated VOCs to give us some consistency across each site.

This is a suggestion for emission limits for biological soil treatment. Could be run past the monitoring/emissions experts.

| Emission point ref. & location | Source | Parameter | Limit (incl |
|--------------------------------|--------|-----------|-------------|
|--------------------------------|--------|-----------|-------------|

| | | | |
|--|--|--|--|
| <p>Description of the emission point including its abatement</p> <p>Example: Soil treatment biofilter as shown on the layout plan in Schedule 7 as A1.</p> | <p>Soil treatment filter biofilter</p> | <p>Odour (Note 1)</p> | <p>1000 ouE_y</p> |
| | | <p>H₂S (Note 1)</p> | <p>No limit s</p> |
| | | <p>NH₃ (Note 1)</p> | <p>20 mg/m³</p> |
| | | <p>Total volatile organic compounds (TVOC)</p> | <p>No limit s</p> |
| | | <p>Speciated VOCs</p> | <p>Limit cont immediat OR Limit cont done from condition</p> |
| | | <p>Particulate Matter (Dust)</p> | <p>No limit s</p> |

Note 1 The monitoring of NH₃ and H₂S can be used as an alternative to the monitoring of the odour concentration. [Do we le

* These standards are taken from biowaste treatment permit for Biogen [Biowaste Treatment Permit Review - Permit Issued](#)

Abatement combinations

Adsorption
 Biofilter
 Fabric filter
 Thermal oxidation
 Wet scrubbing

Any help is welcomed – we need to bottom this out.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169
 I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 18 May 2022 15:54
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Good spot – so this is definitely biological treatment but according to that table not MBT. It then refers to section 5.6 of the BRef, but that just leaves us up in the air as soil bioremediation isn't followed through into the BATCs – maybe they just gave up at that point?

So according to biological BATCs we should have for BAT-AELs:
NH3 or odour

Plus any ELVs for other speciated contaminants in the inventory of emissions (e.g. Benzene if these are an issue (via usual H1 approach)).

And monitoring:
NH3 or odour
H2S

Plus speciated VOC for any other ELV, subject to H1 etc.

No dust or TVOCs though with this though.

The only part of 5.6 (ignoring thermal desorption as it's so dissimilar) to get into the BATC is soil washing – perhaps use this as a guide too? That wouldn't include any more BAT-AELs, but would include Dust and TVOC monitoring under BAT8.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 18 May 2022 14:16
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Table 4.1 in the BRef says:

Table 4.1: Biological treatments of waste

| Biological treatment | Brief description | Included in this document? |
|--|---|---|
| Aerobic treatment (including composting) | Biological decomposition of the organic content of wastes. Applied to solid waste, waste waters, bioremediation and to sludge and soil contaminated with oil. Composting consists of building piles of waste (windrows) to encourage the aerobic biodegradation of organic solids, producing a humic substance valuable as a soil conditioner or a growing media constituent. | See Section 4.2. Only <i>ex situ</i> bioremediation of contaminated soil is covered in this document (see Section 5.6) |

It specifically includes soil contaminated with oil (ex situ soil only).

We do end up with only the one effective mandatory BAT-AEL (H₂S/NH₃ or odour concentration). We can control the likely emissions from the process with emission limits -

since we suspect dust and TVOC we monitor for them too and for dust shoehorn in a dust limit.

Looking at the existing permits we have some TVOC monitoring may not be a shock.

Note Dunton Technologies, Liverpool was given the monitoring as if it were MBT.

Dust is not universal in existing permits.

2 permits have no emissions monitoring at all.

| Operator | Site | Treatment Process or storage associated process | Description treatment |
|-----------------------------------|--|---|--|
| Biogenie Site Remediation Limited | Fawley Remediation Treatment and Recovery Facility - EPR/ZP3133RH | Biological treatment of waste | Bioremediation of hazardous waste and recovery. |
| Brett Aggregates Limited | Hithermoor Recycling And Recovery Facility - EPR/AB3006CE | Biological treatment of waste | Bioremediation of hazardous waste and recovery (S5.3) Bioremediation of non-hazardous waste and recovery (S5.4) |
| Dunton Environmental Limited | Horseley Field Waste Treatment Facility EPR/BP3331DD | Biological treatment of waste | Ex-situ treatment of waste |
| Dunton Technologies Limited | Ellesmere Port Waste Treatment Facility | Biological treatment of waste | Biological treatment of waste (enclosed biopiles, forced aeration) |
| Highfield Environmental Limited | Waste Treatment Facility at ICI (Teesport) No3 Landfill EPR/DP3531DS | Biological treatment of waste | Biological treatment - bioremediation of hazardous waste. Biological treatment - bioremediation of non-hazardous waste. |
| Keltbray AWS Limited | Mohawk Wharf Recycling Facility EPR/FP3092LH | Biological treatment of waste | Bioremediation of hazardous waste Bioremediation of non-hazardous waste (not allowed too). |
| Mick George Ltd | Woodhatch Farm WTS EPR/EP3038VB | Biological treatment of waste | Biological treatment of waste and low VOC contamination Biological treatment of waste and low VOC contamination |

| | | | |
|-------------------------------------|------------------------------|-------------------------------|--|
| Waste Recycling group (Central) Ltd | ERQ - STC, EPR/HP3632RP/V002 | Biological treatment of waste | Bioremediation process Bioremediation process Bioremediation process disposal. Bioremediation process recovery. |
|-------------------------------------|------------------------------|-------------------------------|--|

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169

I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Sent: 18 May 2022 12:12

To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>

Subject: RE: Biofilter monitoring at Daneshill Landfill

I would say it falls more biological than physchem, if we are saying the treatment is bugs biodegrading the organic contaminants. There is no chemical reactions to speak of. For physical treatment – turning/incorporation of organics, (+volatilisation?)

If we classify it as mechanical biological treatment we get ELVs for:

BAT-associated emission levels (BAT-AELs) for channelled NH₃, odour, dust and TVOC emissions to air from the biological treatment of waste

| Parameter | Unit | BAT-AEL (Average over the sampling period) | Waste treatment process |
|-----------------------------|----------------------------------|---|--|
| NH ₃ (1) (2) | mg/Nm ³ | 0,3-20 | All biological treatments of waste |
| Odour concentration (1) (2) | ou _e /Nm ³ | 200-1 000 | |
| Dust | mg/Nm ³ | 2-5 | Mechanical biological treatment of waste |
| TVOC | mg/Nm ³ | 5-40 (3) | |

(1) Either the BAT-AEL for NH₃ or the BAT-AEL for the odour concentration applies.

(2) This BAT-AEL does not apply to the treatment of waste mainly composed of manure.

(3) The lower end of the range can be achieved by using thermal oxidation.

Plus monitoring for the above (NH₃ or odour) and H₂S.

MBT is defined as:

| | |
|--|---|
| Mechanical biological treatment (MBT) | Treatment of mixed solid waste combining mechanical treatment with biological treatment such as aerobic or anaerobic treatment. |
|--|---|

Not looked at the Bref though not sure if this stretches the definition of MBT? To me it would seem a specialist sub category or it.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>

Sent: 18 May 2022 11:23

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>

Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham

The BAT conclusions are more tricky to negotiate than I would like.

If we say that biological treatment of soils is “Biological treatment of waste” then BAT is to monitor for H₂S/NH₃ or odour concentration in accordance with BAT 34 and Table 6.7.

We could say that this process is both “Biological treatment of waste” and “Physico-chemical treatment of solid and/or pasty waste” which would add in Dust but I think we can add in dust anyway.

We could say that this process is both ““Biological treatment of waste” and “Physico-chemical treatment of waste with calorific value” and “Physico-chemical treatment of solid and/or pasty waste” which add in a mandatory 30 mg/m³ for TVOC.

I would like biological soil treaters to monitor for TVOC but we may not be able to set limits.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169

I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Sent: 18 May 2022 10:11

To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>

Subject: RE: Biofilter monitoring at Daneshill Landfill

Thanks Chris,

So we are saying there are no mandatory BAT-AELs for biological treatment of haz soils – bit confused. If mandatory TVOC limit would be needed?

I would be careful about setting limits for odour – the monitoring is expensive and we have previously only put limits in in exceptional cases. NH₃ may be simpler.

There is no way to put TVOC through H1 – would have to use a proxy like benzene as a worst case. We can set limits on individual substance if H1 shows an issue. I would have to look at the rationale behind how we set those as I'm not too familiar – usually we take our limits from the sector guidance/ Bref if needed, so not sure how we would set a particular limits without those.

OK with dust limit.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 18 May 2022 08:50
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham, Katie

I agree that talking with Abraham would be helpful.

My thoughts:

We should base monitoring on the likely emissions from the process.

We should base the limits on the BAT-AETs first which will be mandatory. Then for the other emissions we should base the limit on whether it is necessary to control the emission. The H1 might be the mechanism to do this.

Thus for biological treatment of soils* (not really thought of it as a mechanical biological treatment as it is not put into a mechanical device that turns it or pressurises it – the forced air flow is more related to the abatement than the treatment), they need to monitor for **odour** but they can alternatively monitor for **H₂S** and **NH₃**.

If the contaminant in the waste is oil or other organics then monitoring for TVOC and speciated should be done – there is no mandatory AEL so we could set a limit based on the H1 (either based on real data or on data collected via an improvement condition to do the H1) which could even determine that there is no need for a limit?

We are always going to suspect that particulate matter (dust) could be an issue but again no mandatory BAT-AEL. Where a limit is given it is usually 5 mg/m³ so we could simply go with that as a starting point. Otherwise do we go with the H1 (either based on real data or on data collected via an improvement condition to do the H1)?

So:

| | | | | | | |
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| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 |
| | Odour | | 1000 ouE/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | EN 13725 |
| | Particulate Matter (Dust) | | 5mg/m ³ OR Limit contrived from H1 immediate OR Limit contrived from H1 done from improvement condition OR No limit set?? | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | EN 13284-1 |

* All biological treatment processes for hazardous waste must be actively controlled for emissions – there should be no passive venting of emissions.

What do you think?

I probably need to accelerate the outlines for each of the treatment processes given in the BAT conclusions but there are issues with each of them which are confounding matters.

Dr Chris Hall
Senior Advisor

**Environment Agency
Environment & Business**

Tel: 02030 251169

I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Sent: 17 May 2022 11:47

To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>

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| | | | | | | |
|---|---|---------------|----------------------|---|----------------|--------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | 30 mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
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Kind regards

Katie Dunmore
Permitting Officer
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Grange, Adam

From: Haddock, Samantha
Sent: 13 October 2021 12:38
To: Smith, Heather; Turner, Martin; Bird, Jamie
Cc: Dunmore, Katie
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi all

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Please shout if I can help.

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

My working days are Tuesday - Friday

samantha.haddock@environment-agency.gov.uk

External: 02030 254710

Mobile: 07796997145

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Sent: 12 October 2021 13:03
To: Turner, Martin <martin.turner@environment-agency.gov.uk>; Bird, Jamie <Jamie.Bird@environment-agency.gov.uk>
Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
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Do we need to chat about this more?

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

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Grange, Adam

From: Dunmore, Katie
Sent: 28 July 2022 09:32
To: Haddock, Samantha
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Thanks Sam,


I'll pass this on. Mel mentioned there's a form to fill to conclude the process but I wasn't aware of this either.

This has just reared its head again. Finally got the part refusal draft to the operator and they have come back asking if they put everything in a building can they have the activity? Potentially so, Mel's looking into hours charged v application fee paid. It would also need re-consulting and probably HPI.
Joy!

Kind regards

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From: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>
Sent: 28 July 2022 09:22
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Subject: FW: Daneshill asbestos treatment 8 Oct 2021

Hi both,
Here is some of the e-mail chain. We did have a call with them in which they decided they didn't want to take it any further.
Happy to discuss the detail of the call if needed.
We didn't do the form which might be me missing a part of the process, sorry if so.

Thanks

Samantha Haddock (She/Her)
Habitats Regulation Assessment Team
Team Leader | National Permitting Service | **Environment Agency** | Bristol
samantha.haddock@environment-agency.gov.uk | 07796997145
Please note I don't work on Mondays.

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From: Turner, Martin
Sent: 15 October 2021 10:39
To: Dunmore, Katie
Cc: Haddock, Samantha; Smith, Heather; Martin, Val; Candlin, Mark; Bird, Jamie
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hello Katie

Thanks for yours and Samantha's feedback on this matter

I have spoken to the customers and engagement team (Val Martin and Mark Candlin cc'd) and they have advised that a meeting should be set up to discuss this further

I understand that convention dictates that permitting set this up and should involve RI, C&E, T/L's for permitting and RI and NPS.

I am happy to attend but away the next few weeks

Kind regards

Martin

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Sent: 11 October 2021 17:38
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Smith, Heather

<heather.smith@environment-agency.gov.uk>

Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi Martin,

What is your plan for additional engagement with the local community? We change the applicant an additional £500 to cover the additional costs of this and before we go forward we need to understand how this is going to done.

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I'll be going through all the responses in greater detail this week.

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
☎ 02030 254435 (internal 54435) mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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Sent: 11 October 2021 16:31
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Smith, Heather <heather.smith@environment-agency.gov.uk>
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Hi Katie

Thanks for your response - I will do though I'm not really sure what the question is?

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Martin Turner
Regulated Industry Officer
Environment Agency | Trentside Offices, Scarrington Road, West Bridgford,
Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk
External: 020302 53332 |

Working days: Monday to Friday



Creating a better place for people and wildlife



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Cc: Smith, Heather <heather.smith@environment-agency.gov.uk>; Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>
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Sent: 08 October 2021 10:16
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Smith, Heather <heather.smith@environment-agency.gov.uk>
Subject: Daneshill asbestos treatment 8 Oct 2021

Hi Katie

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martin.turner@environment-agency.gov.uk

External: 020302 53332 |

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Grange, Adam

From: Smith, Heather
Sent: 12 October 2021 13:03
To: Turner, Martin; Bird, Jamie
Cc: Haddock, Samantha; Dunmore, Katie
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Martin

Do we need to chat about this more?

Cheers
Heather

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External: 020302 53332 |

Working days: Monday to Friday



Grange, Adam

From: [REDACTED]
Sent: 18 October 2021 08:20
To: Dunmore, Katie
Subject: RE: Further clarification required Daneshill STF

Good Morning Katie,

Thank you for your emails- I am confirming a response with the Operator.

Kind Regards
[REDACTED]



[REDACTED] Caulmert Limited

Senior Environmental Consultant
[REDACTED]

www.caulmert.com

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

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From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 13 October 2021 18:49
To: [REDACTED]
Subject: Further clarification required Daneshill STF

Hi [REDACTED]

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?

Kind regards

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Grange, Adam

From: Dunmore, Katie
Sent: 19 October 2022 15:25
To: PSC Land
Cc: Dunn-Birch, Ian
Subject: RE: HPI DD for advertising. Daneshill Landfill. FCC NP3538MF/V009 - Urgent

Thank Joel,

I've left the highlighting in as this represents the sections of the permit that have been added or amended (it's a substantial variation). Also as an aid to myself as I need a couple of additional plans from the operator. Please therefore leave them in.

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From: PSC Land <PSC@environment-agency.gov.uk>
Sent: 19 October 2022 14:51
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Dunn-Birch, Ian <Ian.Dunn-Birch@environment-agency.gov.uk>
Subject: RE: HPI DD for advertising. Daneshill Landfill. FCC NP3538MF/V009 - Urgent

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Cheers, Joel

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 19 October 2022 13:00
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Subject: HPI DD for advertising. Daneshill Landfill. FCC NP3538MF/V009 - Urgent

Hi P&SC,

Please add the attached Draft Decision Document and variation notice to our website.

The above application was designated HPI at permit issue, hence why there has been no prior comms on this.

The local area team and comms and engagement have arranged for a letter to be set to interested stakeholders alerting them to the draft decision. In order to co-ordinate could the attached documents be uploaded as a matter of urgency and by tomorrow am?

Many thanks for your help with this.

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Sent: 19 October 2022 15:35
To: Dunmore, Katie
Cc: Dunn-Birch, Ian
Subject: RE: HPI DD for advertising. Daneshill Landfill. FCC NP3538MF/V009 - Urgent

No probs Katie,

That's all submitted now and just waiting for approval and publishing tomorrow. The Citizen Space url will be <https://consult.environment-agency.gov.uk/psc/dn22-8rb-fcc-recycling-uk-limited-draft-decision> and the closing date will be 17/11/22.

The gov.uk advert needs a description of what's being varied so I just lifted this para from the introductory note:

The variation adds a Soil Treatment Facility (STF) located within the existing permitted landfill boundary. The STF will accept and treat up to 29,999 tonnes per annum of hazardous waste and 20,001 tonnes of non-hazardous waste by bioremediation. Once treated the wastes will be tested for suitability for use in the wider landfill restoration. Soils that don't meet the reuse criteria will be disposed of in the landfill.

Let me know if that needs changing.

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Grange, Adam

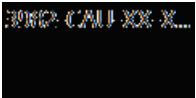
From: Dunmore, Katie
Sent: 22 October 2021 14:09
To: Alexander, Mike
Subject: RE: Katie and Mike chat

Thanks Mike,

Doc attached. I haven't fully assessed the OMP yet.

There are a lot of inconsistencies with this application. Here the OMP describes the biofilter as woodchip however the application documents specifically state the biofilter will be constructed from EWC 19 05 03 off spec compost with smaller amounts of 19 12 06 woodchip and seeded with 2% waste from the process. I'm waiting for clarification from the operator on multiple issues but working on the assumption that they propose off spec compost.

I have concerns regarding the use of this. Abraham is checking with E&B if this has ever come up before and how to approach it.



Kind regards

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From: Alexander, Mike
Sent: 22 October 2021 12:39
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Katie and Mike chat

Hi Katie

No worries. If you want to send me the AQA report if I get time next week I'll have a skim over it. I'm probably only taking one day off, as nothing planned.

Hope you have a good week off. 😊

Mike

-----Original Appointment-----

From: Dunmore, Katie

Sent: 22 October 2021 12:04

To: Alexander, Mike

Subject: Canceled: Katie and Mike chat

When: 22 October 2021 14:30-15:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

Where:

Importance: High

Hi Mike,

I haven't had chance to gather questions for our chat this afternoon.

I have an AQA report for emissions of VOCs from a biofilter and I'm not sure how to approach the assessment. Given its Friday and I'm off for most of next week I think it's probably worth catching up with this after half term.

Have a good weekend.

Thanks
Katie

Grange, Adam

From: Turner, Martin
Sent: 23 November 2021 08:47
To: Dunmore, Katie; Correspondence, EMD
Subject: RE: Minister Pow meeting with Brendan Clarke Smith MP - 23 November 11.45-12.45

Hi

I think Katie's response is spot on – Personally I would also add the assurance that the Agency is well aware of resident concerns.

Martin

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



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for people and wildlife



From: Dunmore, Katie
Sent: 22 November 2021 21:31
To: Correspondence, EMD <EMDcorrespondence@environment-agency.gov.uk>; Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: RE: Minister Pow meeting with Brendan Clarke Smith MP - 23 November 11.45-12.45

Hi Mark,

I'm not aware of a standard response but as you say all applications must be assessed on merit. We have to consider all applications if received complete and can be duly made. The permitting core guidance states "*The regulator must decide whether to grant or refuse the proposal in an application and, where applicable what permit conditions to impose*".

Kind regards

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From: Correspondence, EMD

Sent: 22 November 2021 18:00

To: Turner, Martin <martin.turner@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Correspondence, EMD <EMDcorrespondence@environment-agency.gov.uk>

Subject: FW: Minister Pow meeting with Brendan Clarke Smith MP - 23 November 11.45-12.45

Importance: High

Hi,

Apologies for the late email and tight deadline.

Paul Lockhart & Emily Mayle are meeting with Minister Pow and Brendan Clarke-Smith tomorrow to discuss flood risk in Bassetlaw. However, the highlighted question has appeared late on the scene. There is a link, which appears to take me to as permit variation for Daneshill. Is there anything that I can send to the Minister as she will need to field the question? I assume that we have a generic response re-assuring the general public that we consider all applications on merit?

I need to get back by 10.30am, so if something could be issued by 10am I will check with Bryan Hemmings, Acting AD whether he needs to sign off any response we can provide?

Thanks

Mark

07825 843091

From: Mayle, Emily

Sent: 22 November 2021 17:35

To: Correspondence, EMD <EMDcorrespondence@environment-agency.gov.uk>

Cc: Lockhart, Paul <paul.lockhart@environment-agency.gov.uk>

Subject: RE: Minister Pow meeting with Brendan Clarke Smith MP - 23 November 11.45-12.45

Hi Mark,

We can cover Cllr Turner's point – I agree with your conclusion and can clarify the funding situation in the meeting.

The highlighted one ought to go to the AEM for this area I would suggest, and potentially NPS as well as its waste regulation rather than flood risk related.

FYI, our Senior Users for Retford and West Stockwith/LIAMs will have bullet point updates to share with the Minister as early as we can tomorrow but given I've only asked for it tonight and they'll need Paul/Bryan sign off, might be cutting it fine before the meeting. We'll work to the same 10:30 deadline.

Thanks
Emily

Emily Mayle

Partnerships and Strategic Overview Team Leader | Nottinghamshire and Tidal Trent
Environment Agency | Trentside Offices | Scarrington Road | West Bridgford | Nottingham | NG2 5BR

Contact | Int: 53230 | Ext: 020302 53230 | emily.mayle@environment-agency.gov.uk

Incident management standby role: Flood Warning Duty Officer | Tactical Liaison Officer



Supporting
racial equality

From: Government Relations

Sent: 22 November 2021 17:27

To: Correspondence, EMD <EMDcorrespondence@environment-agency.gov.uk>

Cc: Lockhart, Paul <paul.lockhart@environment-agency.gov.uk>; Mayle, Emily <emily.mayle@environment-agency.gov.uk>; Government Relations <Government.Relations@environment-agency.gov.uk>

Subject: RE: Minister Pow meeting with Brendan Clarke Smith MP - 23 November 11.45-12.45

Importance: High

Hi Mark (and copying Paul and Emily for awareness)

Minister Pow's office have given us head's up of two questions for the meeting with Cllrs have submitted in advance (one is nothing to do with flooding!) – I have copied these both below in bold.

Is there any chance you would be able to get me a few bullets to address the first one, highlighted, say by 10.30am tomorrow, so we have time to get that across to the Minister before the meeting – just some high level lines for her to respond to the question? Even if we just have to say something quite generic that we will not permit activity if it will harm environment...?

On the second one, I think we have this broadly covered in the briefing already (e.g. any scheme needs to demonstrate economic feasibility and value for money and is subject to government partnership funding rules, and we have made it clear to local partners that traditional scheme will be challenging on these grounds) – but if there is anything more specific we can say about the affordability of this scheme then that may help. I have tried to reassure Defra colleagues that the Cllr is obviously trying to make a point and so it is probably the case something was lost in translation and we would not have bluntly said “there is no money for it” – but will be useful for Paul and Emily to be prepared for that.

Question from Cllr Gerald Bowers - Bassetlaw District Council - Member for Ranskill Ward

Re: Environment Agency

<https://www.gov.uk/government/publications/dn22-8rb-fcc-recycling-uk-limited-environmental-permit-application-advertisement-eprnp3538mfv009/dn22-8rb-fcc-recycling-uk-limited-environmental-permit-application-advertisement-eprnp3538mfv009>

The company FCC already has enough Soil Treatment and Recycling plants in our area.

Why is DEFRA or The Environment Agency considering giving them yet another license to treat waste soil and other waste items right next to a NATURE RESERVE where we recently released Beavers back into the environment. Residents in my ward are looking for an assurance that they will NOT be granted a license.

What can the Minister advise?

Second Question:

Question from Nigel Turner:

Defra statement and Question

Worksop town centre has suffered two severe floods and two near misses since the turn of the century.

We have an ever changing climate with the potential risk of future incidents increasing, we are sat waiting for the next flood with fingers crossed and sandbags at the ready, which is not good enough.

Two weeks ago I attended a meeting with our MP Brendan Clarke-Smith and the EA, during the meeting the EA made it clear there is a solution, but there is no money to support it.

Over many years Worksop has had to suffer the inaction of our Labour led District Council, with little or no innovation or investment, our once proud market town is now decimated.

We have sat back and suffered, our town centre is unsafe, unkempt and under constant threat from the floods.

Hope was offered in December 2019/20 by our Government and there has been a lot of talk regarding 'levelling up'.

To our local economy, town and residents 'levelling up' means saving the town from future floods, there is a solution it just needs government investment, the alternative is a return to the Red Wall.

My question is:

We talk about 'levelling up', to Worksop's business economy and residents 'levelling up' looks like financial investment by government, giving Worksop town centre, the local economy and residents a much needed boost and the opportunity to thrive once again.

Thank you,

County Cllr Nigel Turner.

Thanks, Zac

Zac Lamdin | Senior Government Relations Adviser

Pronouns: he/his ([why is this here?](#))

Environment Agency | 2 Marsham Street, London SW1P 4DF
Tel: 0208 474 5469 | Mob: 07917 595188 | Email: zac.lamdin@environment-agency.gov.uk

From: Government Relations

Sent: 22 November 2021 16:23

To: Correspondence, EMD <EMDcorrespondence@environment-agency.gov.uk>; Lockhart, Paul <paul.lockhart@environment-agency.gov.uk>; Mayle, Emily <emily.mayle@environment-agency.gov.uk>

Cc: Government Relations <Government.Relations@environment-agency.gov.uk>

Subject: Minister Pow meeting with Brendan Clarke Smith MP - 23 November 11.45-12.45

Hi Mark, Paul and Emily

Just to let you know that I've now had the meeting time for tomorrow confirmed – its scheduled for 11.45 – 12.45. Minister Pow's office should forward on the appointment to you (Paul and Emily) directly, so you should have that soon if not already. There won't be time for a pre-brief with the Minister before the meeting.,

Also for awareness I understand in addition to the MP the following cllrs are being invited:

- john.ogle@cllr.bassetlaw.gov.uk
- ant.coultate@cllr.bassetlaw.gov.uk
- Gerald Bowers
- denise.depledge@cllr.bassetlaw.gov.uk
- lewis.stanniland@cllr.bassetlaw.gov.uk
- cllr.callum.bailey@nottsc.gov.uk
- cllr.mike.introna@nottsc.gov.uk
- Councillor Tracey Taylor
- Cllr nigel.turner@nottsc.gov.uk

Thanks

Zac

Zac Lamdin | Senior Government Relations Adviser

Pronouns: he/his ([why is this here?](#))

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Tel: 0208 474 5469 | Mob: 07917 595188 | Email: zac.lamdin@environment-agency.gov.uk

Grange, Adam

From: Tucker, Tania
Sent: 27 January 2022 09:38
To: Dunmore, Katie
Subject: RE: Off-spec compost 19 05 03 as a biofilter

Hi Katie

I am flat out on urgent must do stuff today. I am free after 11:30 tomorrow if that works?

Cheers Tan

Tania Tucker
E&B Senior Advisor (Non-hazardous & inert waste sector lead)
Environment Agency

tania.tucker@environment-agency.gov.uk

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 27 January 2022 09:36
To: Tucker, Tania <tania.tucker@environment-agency.gov.uk>
Subject: FW: Off-spec compost 19 05 03 as a biofilter

Hi Tania,

Following on from my email below. Are you available to have a call regarding the use of the CLO bio filter?

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Dunmore, Katie
Sent: 10 January 2022 09:26
To: Tucker, Tania <tania.tucker@environment-agency.gov.uk>
Subject: RE: Off-spec compost 19 05 03 as a biofilter

Hi Tania,

I'm just checking in with this and wondering whether the permitting process is actually the right route to authorise the use waste EWC 19 05 03 as a filter medium?

I'm concerned we could be stuck with a protracted assessment which could be avoided if the operator installs a standard non-waste filter medium. Given the operators evidence is based upon unpermitted operations and the high level of scrutiny authorising this activity will require should the assessment be dealt with by yourselves outside the permitting process? If authorised permit variations would then be required and/or compliance dealt with separately.

From the information presented so far and discussions with the applicants consultant it appears their evidence for the wastes efficacy is based upon monitoring data from what they state is a similar filter already operating at Rowley Regis. The AQA assessment provided is based on this data but does not contain information on source term, emissions concentrations or emissions rates. There doesn't seem to have been specific characterisation of the gas streams.

This assessment only covers human health impacts of the four main VOC's. The OMP is lacking any detail of nuisance impacts from the filter and there is no information provided on bio aerosols.

Bio filter aside, this application has many non-standard operating techniques proposed which are leading to a challenging determination. I'm trying to gain control by considering what should and should be included in our assessment. The application has attracted a lot of local interest and a lot of these concerns draw attention to historic nuisance and the site not being a good neighbour. This doesn't lend itself to allowing non-standard activities to run under temporary evidence gathering conditions.

Considering this could you consider if the filter medium could be assessed outside of this process by yourselves. Alternatively if we do need to consider it now would you be able to provide a list of questions I could work into a Schedule 5 request? If we do push back the assessment we would need to provide an outline of information requirements.

It would be useful to chat this through. Are you free Wednesday morning? I have a call at 11 -11.30 but aside from this I'm free.

Kind regards

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

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From: Tucker, Tania
Sent: 30 November 2021 08:16
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: FW: Off-spec compost 19 05 03 as a biofilter

Hi Katie

I have contacted my colleagues re the proposed biofilter. Some useful comments below. Regards Tan

Tania Tucker
E&B Senior Advisor (Non-hazardous & inert waste sector lead)
Environment Agency

tania.tucker@environment-agency.gov.uk

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Working days: Monday to Friday

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From: Siddle, Sophie

Sent: 29 November 2021 16:57

To: Nicholls, Kathy <kathryn.nicholls@environment-agency.gov.uk>; Tucker, Tania <tania.tucker@environment-agency.gov.uk>

Subject: RE: Off-spec compost 19 05 03 as a biofilter

Hi Tan (and Kathy)

I haven't come across this before and in the absence of the specific details I have the following general comments to make on the suitability of this as a biofilter medium.

As there is little info provided, my initial gut feeling was that it sounds like a way to legitimise the disposal of the oversize, but I'm happy to be proven wrong on that one.

I'm assuming that it's the oversize following the composting process and it's not off-spec for any other reason i.e fine compost which hasn't met the stabilisation test etc.

I'd be interested to know how they are going to 'specifically produce' the biofilter medium. A good biofilter medium has uniform particle size, is homogenous with good porosity. Generally oversize contains a mix of hard/soft woods, possibly some treated wood etc. Also if they need to screen to a smaller size to remove plastics etc they risk creating a finer material losing porosity and compaction can also occur. This will depend on their processing techniques and could be an expense they are initially trying to bypass by offering it as a biofilter medium.

I agree with Kathy's point about characterising the gases first before determining the design and dosing procedure. Has this been done? We would need to know what they are remediating at the STP, what gases are produced, and therefore to be treated, and what is the most effective way to do this. This should be backed up with data.

It's hard to comment on the effectiveness of the tarpaulin cover without understanding the design of the bio-filter and the flow rate etc. They only state it will retain moisture content and contain odour emissions. How are they to maintain air flow and moisture for efficacy?

I've put some other comments below in green, mainly agreeing with Kathy's comments.

Sophie

From: Nicholls, Kathy

Sent: 29 November 2021 13:35

To: Tucker, Tania <tania.tucker@environment-agency.gov.uk>; Siddle, Sophie <sophie.siddle@environment-agency.gov.uk>

Subject: RE: Off-spec compost 19 05 03 as a biofilter

Hi Tan

A few occasions where it's been used. The need to demonstrate the Empty bed residence time and the residence time of the bio filter etc. The design fits the need.

Your welcome

From: Tucker, Tania

Sent: 29 November 2021 11:00

To: Nicholls, Kathy <kathryn.nicholls@environment-agency.gov.uk>; Siddle, Sophie <sophie.siddle@environment-agency.gov.uk>

Subject: Off-spec compost 19 05 03 as a biofilter

Hi

I wondered if I could pick your brains please. FCC are trying to justify using off-spec compost from one of their sites as a biofilter at a soil treatment facility. The reasoning FCC has given the permitting officer as to why it is considered a suitable biofilter is given below. The particle size comment makes sense but I am not sure about off-spec compost. The site they are using as an example is Edwin Richards Quarry EPR/HP3632RP however this has not been permitted for this type of material as a filter. Clearly they are using it though. Have you come across this type of odour control before? I can request the AQ modelling if that would help. Any thoughts? Cheers Tan

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. How are they going to 'specifically produce' this? At Daneshill Landfill, the oversize compost is hydrated and a small amount of ammonium nitrate is added to increase the available nitrogen to 1. approximately 100mg/kg to ensure that the medium is supportive of microbial proliferation once there are effluent gases passing through the biofilter; They will be better to fully characterise the gases (BAT 3) and then look at the microbilocal loading and population of the compost media. Before any dosing. Otherwise they will end up with a very niche population of organisms. – Agree 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. 2. This is not sufficient they need to do representative temperature and moisture of the filter to ensure the filter is kept at optimal conditions. And the biofilm is maintained. Very poor. Agree with Kathy's comments, Is the tarp acting as the main odour control? What happens with this is uncovered and disturbed? Need more info to comment on this.

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. Depends on particle size /grade that's nonsense 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 where is this ? 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. temperature inlet and out let moisture content, pH, available nitrogen, back pressure particle size etc) they need to monitor the parameters it is designed for – so if the flow rate is X at design then they need to ensure that – agree. There should be more detail on their specific design and monitoring parameters 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.

I would say that compost media can result in bioaerosols release – we have had some sites where the plenum has collapsed under the weight of the compost or as it degrades it gets more compact – so the OMP needs to set out clearly how they assess the efficacy and maintenance.

Tania Tucker

E&B Senior Advisor (Non-hazardous & inert waste sector lead)

Environment Agency

tania.tucker@environment-agency.gov.uk

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Grange, Adam

From: Kenny, Loraine
Sent: 10 May 2022 09:48
To: Dunmore, Katie
Subject: RE: Partial permit variation refusal
Attachments: Decision document variation - Copy.docm

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 06 May 2022 08:37
To: Kenny, Loraine <loraine.kenny@environment-agency.gov.uk>
Subject: RE: Partial permit variation refusal

Hi Loraine,

DD attached. The application is for a new soil treatment facility within the boundary of an existing landfill. We are refusing the acceptance of asbestos contaminated soils for screening and hand picking. The applicant is permitted to carry out this activity at other sites but very few control measures were proposed here. Soil handling was akin to what we would expect at a non-hazardous facility.

We are permitting the acceptance of waste materials for bioremediation.

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

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From: Kenny, Loraine <loraine.kenny@environment-agency.gov.uk>
Sent: 05 May 2022 14:53
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Partial permit variation refusal

Good afternoon Katie,

Please send the Decision Document over.

I'm on leave tomorrow but hopefully I should get it back to you early on next week.

Kind regards

Lorraine

Lorraine Kenny

Senior Lawyer
National Permitting Service
Head Office Legal Services

Email: loraine.kenny@environment-agency.gov.uk
Mobile: 07827-251955

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From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 05 May 2022 14:40
To: Kenny, Lorraine <loraine.kenny@environment-agency.gov.uk>
Subject: Partial permit variation refusal


Hi Lorraine,

I have a partial permit variation refusal. I think it should be reviewed by legal before issue. Could I send the DD over for a quick check?

Kind regards

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

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Grange, Adam

From: Turner, Martin
Sent: 16 September 2021 10:54
To: Dunmore, Katie
Subject: RE: Potential HPI. Daneshill Landfill proposed STF

Thanks Katie I've forwarded this on to Jamie Bird – acting Landfill sponsor

Mart

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



From: Dunmore, Katie
Sent: 16 September 2021 10:27
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: Potential HPI. Daneshill Landfill proposed STF

Hi Martin,

I've attached a HPI crib sheet to help consider if you think Daneshill should be HPI and area engagement guidance. The final decision should lie with your AEM with agreement from my PPTL – Samantha Haddock who is aware of the application.

[Engagement Guidance - All Documents \(ea.gov\)](#)

Points to pick out from the guidance to ensure the application (not the site) is HPI.

High public interest applications

We decide whether an application is of high public interest on a **case-by-case basis**.

To reach our decision we **consider all the relevant information**, including:

- whether the interest relates to issues regulated under an environmental permit
- the breadth and scale of interest – for example, the number of different sources such as individuals, interest groups, businesses, local councillors, media and whether there is ongoing engagement from the local MP
- whether the interest is, or is likely to be, sustained for a period of time

An application can become high public interest at any stage. We review our decision if circumstances change.

When we decide an application is high public interest, **we tailor our consultation to the particular circumstances**.

For bespoke permit applications and changes (variations), we **may** do one or more of the following:

- consult for more than 20 working days
- publicise more widely, for example public drop-in events, press releases, social media and adverts

- consult on the draft permit or notice and the draft decision document

So far we have received 33 public and an MP's response to our standard Gov.UK advertisement. One particular resident spoke to me last week and was very concerned that there is a strength of feeling in the village and she is encouraging other to write. She requested the consultation timeframe be extended partly because some were not computer literate and needed longer and also that the ad coincided with the school hols/ bank holiday etc.

We have agreed this. The portal for responses is now open until 23/09/2021. I have also reassured her that we will accept representations up until the determination date via email and post. Once the portal is closed contact details remain visible. She seems satisfied with this. I believe she wanted reassurance that we weren't closing the door to residents expressing their opinions up until determination.

<https://consult.environment-agency.gov.uk/psc/dn22-8rb-fcc-recycling-uk-limited>

This may now be enough but obviously want to make you aware of the interest and consider if a comms plan should be implemented.

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
✉ katie.dunmore@environment-agency.gov.uk

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Grange, Adam

From: Turner, Martin
Sent: 16 September 2021 13:48
To: Dunmore, Katie
Subject: RE: Potential HPI. Daneshill Landfill proposed STF

Hi

The consultee No 649434312 has about got it spot on I think....

Mart

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



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From: Dunmore, Katie
Sent: 16 September 2021 10:27
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: Potential HPI. Daneshill Landfill proposed STF

Hi Martin,

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[Engagement Guidance - All Documents \(ea.gov\)](#)

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- the breadth and scale of interest – for example, the number of different sources such as individuals, interest groups, businesses, local councillors, media and whether there is ongoing engagement from the local MP
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<https://consult.environment-agency.gov.uk/pssc/dn22-8rb-fcc-recycling-uk-limited>

This may now be enough but obviously want to make you aware of the interest and consider if a comms plan should be implemented.

Kind regards

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

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Grange, Adam

From: Dunmore, Katie
Sent: 02 November 2021 14:40
To: Tucker, Tania
Subject: RE: Use of off spec compost - EWC 19 05 03 to construct a biofilter

Thanks Tania,

Yes, I have an RFI out with the applicant asking some basic questions as to why CLO is proposed but haven't gone into quality and waste acceptance yet.

Their AQ modelling shows VOC emissions will all be fine but the report doesn't indicate what filter medium was considered. There's quite a bit of further work needed here.

I was planning to include the biofilter as a DAA.

The CLO and waste woodchip are to be included within the biopiles along with non-waste nutrients to aid the bioremediation process. I believe I have seen this come up with land remediation deployments but can't remember the details. Again I have an RFI out with regards to quantities.

The STF will be within the boundary of an operational landfill (Daneshill, Nottinghamshire). The remediated soils will be used as capping material which will be subject to WAP at the landfill.

The issue I have at the moment is the application is very vague with little detail as to why the multiple non-standard techniques proposed are considered suitable. There's a separate asbestos screening activity to also consider which is very non-standard.

The operator (FCC) has several similar operations around the country but this particular site seems to be lacking the normal emissions control infrastructure. I'm hoping to raise some detailed questions which will steer final decisions.

Many thanks

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

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From: Tucker, Tania
Sent: 02 November 2021 10:11
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Use of off spec compost - EWC 19 05 03 to construct a biofilter

Hi Katie

I will have to do some digging into this and ask around. I think you are right off-spec compost could be smelly it could also contain a lot of contraries which could affect the efficacy of the material as a biofilter. So we would need to know more about exactly what the material is and why it is off-spec. Loads of plastic is not going to help microbes treat VOCs etc

The material being used in the biofilter would be waste so I think the biofilter activity would need to be permitted too if we are happy it is suitable. (will double check this)
We do need a lot more info about the biofilter though. Why are they not using the usual types of non-waste material in it?

Re the mixing it in to the soil – I assume this is after the soil has been treated? The mixing and deposit of the treated soil and biofilter material would need to be permitted and suitable for the proposed use. Again we would need to be sure the off-spec compost was not full of plastics and other contraries.

Cheers Tan

Tania Tucker

E&B Senior Advisor (Non-hazardous & inert waste sector lead)

Environment Agency

tania.tucker@environment-agency.gov.uk

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Working days: Monday to Friday



From: Dunmore, Katie

Sent: 01 November 2021 16:23

To: Tucker, Tania <tania.tucker@environment-agency.gov.uk>

Subject: Use of off spec compost - EWC 19 05 03 to construct a biofilter

Hi Tania,

Kathy Nichols has advised you may be able to help with regards to the above use of waste and whether it's appropriate.

To summarise, I'm determining a permit for a new soil treatment facility. The applicant proposed to use bioremediation to treat hydrocarbon contaminated soils. They propose to install a biofilter roughly 750m³ in size. The filter will be constructed of waste material 19 05 03, with a smaller amount of waste wood 19 12 07 and seeded with 2% waste from the process.

I've not come across the use of waste in a biofilter before, neither has my team. I have concerns with the use of waste given 19 05 03 can be unpleasant and was wondering if the use of waste in this way is permissible. Would we need specific information from the applicant or need to impose conditions in the permit?

The applicant also intends to use these materials in the biopiles as conditioners. I believe I may have seen this come up in mobile plant land remediation's and is permissible but just wonder as a filter media if this would work?. Any pointers would be gratefully received.

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

☎ 02030 254435 (internal 54435) mob: 07584 369561

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

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Grange, Adam

From: PSC Land
Sent: 06 August 2021 16:37
To: vicente.orts@fccenvironment.co.uk
Cc: [REDACTED]
Subject: Schedule 5 Notice - EPR/NP3538MF/V009
Attachments: Application - Variation - Schedule 5 Notice.pdf

FAO: The Company Director and/or Secretary

Dear Sir/Madam,

Please see attached schedule 5 notice.

If you have any questions regarding the notice, please contact Katie Dunmore on 02030 254435 or email katie.dunmore@environment-agency.gov.uk

We are currently following Government advice to manage the risks of Coronavirus to our organisation, to protect the health, safety and wellbeing of our staff and sustain our critical operations. In line with government advice, all of our permitting staff are now working remotely to reduce unnecessary contact.

Therefore, please send your Schedule 5 response by e-mail only, as we will not be able to collect any postal responses from our office address.

Kind regards,

Harace Hussain

Permitting Support Advisor
Part of National Operations
National Permitting Service (part of National Services E&B)

☎ External: 02030256381 ☎ Internal: 56381 ☎ (Team Number) 02030253898

- ✉ Land Team, Environment Agency, Quadrant 2, 99 Parkway, Avenue, Sheffield, S9 4WF
- ✉ Email: harace.hussain@environment-agency.gov.uk
- ✉ Email: PSC@environment-agency.gov.uk



Grange, Adam

From: Dunmore, Katie
Sent: 05 January 2022 18:15
To: AQMAU, Air Quality Unit
Subject: The use of ADMS 5.2 for assessing VOC emissions
Attachments: Application Variation 3982-CAU-XX-XX-RP-V-0308.A0.C3 OMP (Final issue).pdf

Hi AQMAU,

Can I run a general query past you? I seem to have an issue which has not come up before in permitting.

I have an operator who has provided an AQA report based on ADMS 5.2 to assess emissions of Benzene, Toluene, Xylene and Ethylbenzene. They have based their data on emissions concentrations of these substances taken from a biofilter from another operational site over an 18 month period.

I didn't ask for the AQA and given biofilters are BAT wouldn't have considered this necessary however the biofilter they want to construct is made of waste CLO - EWC 19 05 03. We have concerns with the use of waste as a filter medium however the operator has stated the emissions data used is from a biofilter constructed of CLO. They state they operate numerous filters constructed in this way.

Compliance issues aside I'm stuck and unable to move my permit along. Ideally I'd like to advise the operator to put in a standard non-waste filter medium. It's a bit tricky however if they have presented evidence CLO may work. I therefore feel we need to assess the AQA. I however don't really know how to and I'm unable to get help within my team. Can ADMS 5.2 be used in this way? Would you be able to run the modelling? I haven't got the files but can request them if this is something we can assess and that will provide meaningful results.

I've attached the OMP for the site, the AQA is at the bottom of this document. Any pointers gratefully received.

Kind regards

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

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

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Grange, Adam

From: Turner, Martin
Sent: 20 May 2022 13:48
To: Dunmore, Katie
Subject: RE: Daneshill landfill STF permit variation

Hi Katie

I hope you are well

An initial question – what is the impermeable pavement and sealed drainage going to look like?

What have they proposed?

Martin

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 17 May 2022 16:29
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: Daneshill landfill STF permit variation

Hi Martin,

The above variation is complete and I've attached the permit docs for your review. The highlighted sections in the permit are those added or amended as part of the variation.

We have included a couple of improvement conditions requiring the operator provided detailed evidence the biofilter is functioning correctly. We are permitting the use of EWC 19 05 03 based on the monitoring data they have provided for a similar site which is operating without issue. I'm awaiting a second opinion from E&B on the biofilter monitoring requirements but they are unlikely to change significantly.

We are permitting the STF treatment tonnage requested even though asbestos treatment is refused. The volume of waste itself wasn't a problem. The operator is however likely to revise the site layout given the refusal (which I haven't discussed with the yet). I'm therefore not trying them into any specific site layout plan at this time.

I haven't included dust or odour management plans in the Operating Techniques table. I don't think they are brilliant but are sufficient for permit determination. Dust was a particular issue due to the asbestos activity but given this is now not permitted and the site is within the landfill boundary dust from bioremediation is less of an issue. Similarly odour shouldn't be a concern given they are treating oily waste, this is however one of my queries regarding biofilter monitoring.

Please let me know if you have any questions.

Kind regards

Katie Dunmore
Permitting Officer
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8 katie.dunmore@environment-agency.gov.uk

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Grange, Adam

From: Turner, Martin
Sent: 05 May 2022 14:13
To: Dunmore, Katie
Cc: Jones, Rhidian
Subject: RE: Daneshill Landfill STF permit variation update

Ok that is fine Katie - very relieved to hear about the asbestos treatment aspect!

Martin

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 05 May 2022 14:11
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: Daneshill Landfill STF permit variation update

Hi Martin,

Just a quick update regarding the above. Determination is almost complete. I'm just awaiting technical and legal input before I communicate with the operator.


We have decided to refuse the asbestos screening and handpicking activity in its entirety. Screening for the reasons previously discussed, the applicant also wasn't able to provide any meaningful mitigation for the handpicking activity either.

Bioremediation of hazardous and non-hazardous waste will be permitted as will the use of waste (19 05 03 off spec compost) as a biofilter medium. We are including a number of pre-operational and improvement conditions to ensure site set up and operation is as it should be. Considering this once the documents are finalised I think it would be useful if I forwarded the document over for you to take a look.

Kind regards

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

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

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Grange, Adam

From: Turner, Martin
Sent: 27 May 2022 08:05
To: Dunmore, Katie
Subject: RE: Daneshill landfill STF permit variation

Ok thanks Katie

Have a great weekend

Martin 😊

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 26 May 2022 14:05
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

Hi Martin,

I believe the application docs reference the water treatment as non-hazardous treating less than 50m3. I did consider whether this should be a waste activity but given the treatment is only associated with the bioremediation I think its OK as a DAA. This is also in keeping with FCCs permit at Rowley Regis.

I've had some further advice on monitoring requirements for the biofilter. I haven't really got a clue what's appropriate as BAT is so woolly on bioremediation, hence why I'm leaning on E&B for more of a steer.

| | | | | | | |
|---|---|-----------------------------------|----------------------|---|----------------|---|
| Biofilter As shown on soil treatment activity layout plan?? | H ₂ S | Soil treatment facility biofilter | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 for sampling NIOSH 6013 for analysis * |
| | NH ₃ | | 20 mg/m ³ | | | EN ISO 21877 * |
| | Total volatile organic compounds (TVOC) | | No limit set | | | BS EN 12619 |
| | Particulate Matter (Dust) | | No limit set | | | EN 13284-1 |

E&B have also suggested odour units and speciated VOC. I have been advised however not to include these because of their complexity. H₂S and NH₃ is an alternative to OU and much more tangible to assess. I'm not sure of the chemistry as to why speciated VOC's is difficult, my PPO just advised not to go there.

Kind regards

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

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From: Turner, Martin <martin.turner@environment-agency.gov.uk>
Sent: 25 May 2022 14:48
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

Hi thanks for this

Sorry you're having a bit of a nightmare!

Sounds to me like they have thought about it which is good - could the treatment of the water potentially be haz waste treatment (oily water)? Is this something they have considered?

Martin

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 25 May 2022 11:14
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

Hi Martin,

Sorry, I took leave yesterday.

A new system is being installed within the STF footprint to treat waters arising from the bioremediation. The current location is to the north west. I'm trying to locate the details. Having a nightmare as all the application documents are on EDRM which I can no longer access and they haven't transferred across to DMS or the transitional DMS folders.

The water treatment system itself is oil/water separation with carbon filtration. I've attached a Schedule 5 response I received from the operation. The earlier questions deal with the water treatment system and Q6 provides a schematic of the system. It should all be bundled as well.

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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From: Turner, Martin <martin.turner@environment-agency.gov.uk>
Sent: 24 May 2022 08:28
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

That's ok – when you say treatment system do you mean the leachate lagoons or tanks? I think it's worth knowing as the leachate lagoons are not in a good state.

Mart

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 23 May 2022 16:34
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

Hi Martin,


I've enclosed a copy of the treatment pad design and separate wider site drainage pad. Surface waters are then captured in a sump and pumped to the treatment system. All waste operations area marked for occurring on these pads with the wider site hardstanding draining to the existing lagoon.

The above is the 4th drainage plan request which still doesn't have the hardstanding area labelled. Partly why I'm going with the IC's because after many times of asking its difficult to extract information.

Kind regards

Katie Dunmore
Permitting Officer
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8 katie.dunmore@environment-agency.gov.uk

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From: Turner, Martin <martin.turner@environment-agency.gov.uk>
Sent: 20 May 2022 13:48
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

Hi Katie

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An initial question – what is the impermeable pavement and sealed drainage going to look like?

What have they proposed?

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Please let me know if you have any questions.

Kind regards

Katie Dunmore
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Grange, Adam

From: Wall, Clive
Sent: 09 March 2022 11:10
To: Dunmore, Katie; Hall, Chris; Raynes, Graham
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Hello Katie,

As I have said previously, I'm not aware the biofilter is constructed from waste at Edwin Richards and cant see how the permit would allow it. How will this be incorporated into the Daneshill permit? Will there be a table with waste codes permitted to construct the biofilter from?

Clive

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 09 March 2022 10:56
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Cc: Wall, Clive <clive.wall@environment-agency.gov.uk>
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Hi All,

Thanks for your comments.

I don't feel able to consider the screener. Our guidance is simple on this, just stating the process needs to be enclosed and abated by HEPA filter which FCC have offered. However considering the wider asbestos proposals and the significant local opposition to these open air activities asbestos operations are not considered acceptable at Daneshill.

FCC's response doesn't offer any further assurance with regards to the asbestos storage and picking activities. Soils are still maintained in loose stockpiles with only tarpaulin covers etc.

Having discussed with my team the asbestos treatment activity will be refused in its entirety. Bioremediation will be permitted. This is the site where FCC propose to use a waste material bio filter (EWC 19 05 03). Based on the 18 months of monitoring data from Rowley Regis which they state is also waste we have agreed to permit this. An IC will be used however to ensure the filter is effective and media replaced if necessary.

Kind regards

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

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

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From: Hall, Chris
Sent: 07 March 2022 13:31
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Wall, Clive <clive.wall@environment-agency.gov.uk>
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Katie and Graham

Sorry it has taken so long to get back to you. I have been very busy and also had some leave. We have not changed our stance on enclosure of the screener to my knowledge although Clive may be able to tell you more.

I read the Nicole report before and skimmed it again. Remediation on the site of the contaminated land and fixed plant installations for treatment of soils are entirely different scenarios. The former takes place under mobile plant rules determined by the remediation teams. The work on site lasts a short period of time and is risk assessed against the needs of the site on a case by case basis. Installations will take in waste day after day, year after year ad infinitum and they have to adhere to the appropriate measures guidance just like every other installation site. That means in this instance enclosure of the plant and equipment.

Chris

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 24 February 2022 18:45
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: FW: Daneshill Landfill. Asbestos soil screening and BAT 14

Chris,

FCC appear have provided Katie further justification at Daneshill – in particular:

Storage will be on the open pads but covered with sheeting between delivery and treatment.

For the proposed pre-screener they are covering and abating via a HEPA filter. Is this a development from the Rowley Regis pre-app? Has anything been agreed there?

They are also challenging why we are requiring such tight control and refer to a 'Nicole' Report (I'm not familiar with it – are you?) asking what is our evidence for fibre release.

Conveyors from screen to picking station are appear covered though Katie says uncovered – not sure. Covered would be BAT I would say – given they're in the open. The waste is damped on the way into the picking stations so would appear to not be before that stage.

Picking station itself appears OK – same design as they already use.

See also notes below in red.

What do you think?

Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

External: **020302 50600**

Internal: **30600**

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

Sent: 24 February 2022 14:56

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: Daneshill Landfill. Asbestos soil screening and BAT 14

Hi Graham,

FCC have provided further justification for their proposed asbestos soil screening and hand picking operations at the above site. I had previously confirmed with the operator these activities would be refused given we did not consider the proposal met BAT 14, in particular containment, collection and treatment of diffuse emissions.

FCC's have made an additional submission in support of their application which I have attached. I have the following questions and comments as to whether the submission provides appropriate assurance and I'd appreciate your advice as to whether we should stick with a refusal of this activity.

To summarise all storage and treatment activities are still proposed to be undertaken outside with the picking operation undertaken in a mobile above ground picking station with plastic weather covering like structure. The screener and conveyers leading to it are now enclosed with HEPA filtration as described in the document. Boundary monitoring and has been tightened up. The operator now proposes to monitor outside the picking station. I'm still however unsure if this monitoring is reliable or possible down to the detection limits FCC describe.

Monitoring. FCC confirm monitoring results will be available within 1hr of sampling. Mitigation undertaken if fibres detected above 0.001f/ml. Is this possible in an external environment? **Depends – not going to catch the asbestos as after the fact – would only be evidence of some other problem likely fibrous asbestos has slipped through. What is the mitigation proposed? Asbestos fibre limit of detection = 0.001 fibres/ml according to the ambient monitoring method we specify, so must be achievable. They're basically saying if they detect anything they'll apply (unspecified) mitigation.**

Boundary monitoring has a detection limit of 0.0005f/ml again is this something we could rely on outside? **Not sure – seems low. Maybe better techniques used now? Chris are you aware of lower LOD methods?**

The monitoring plan referenced shows a couple of monitoring location on each treatment pad. This will need further clarification as previously FCC confirmed asbestos operations would be mobile from one pad to another with no dedicated location. This document now confirms asbestos storage and processing will be on a dedicated pad. **Monitoring has to be flexible as it is dependant on the wind direction. Upwind sampling is needed to establish without doubt the source. They possibly need to specify several of locations around the process, but not necessarily monitor all of them on a particular run. Minimum they should cover the directions of sensitive receptors – I can't remember if there were any close here.**

Picking station and screener

Is the proposed screener in line with the proposal at Rowley Regis? **Chris – as above**

The screener is now enclosed with monitored HEPA filter. Hopefully diffuse emissions from the activity could be avoided. My concern however is that asbestos pieces will be broken by the agitation. The output soils will then be discharged into the picking station. **They will be within the abated screener, so free fibres produced should be abated. Some abrasion is likely in any handling. Also we have permitted this at Rowley as long as it is enclosed and abated, so I don't think we can backtrack here for this.**

As previously detailed this is a mobile unit with windows and flimsy cover. I would consider without screening this could be OK based on the fibre content of the soils at Waste Acceptance. Now however I'm concerned these soils will have a higher fibre load due to passing through the screener. **Again – we have accepted this arrangement in principle at Rowley – they say this is the same design.**

The input and output conveyors are uncovered with water suppression provided by spray rail – don't think this is enough. **Input covered prior to spray rail seems BAT to me. Outward too? Chris?**

My thoughts

Based on the WAP limits for fibres within the soil we could potentially permit the hand picking activity. Without the agitation of screening the methods proposed seem robust enough to prevent asbestos pieces breaking and fibre emissions unlikely.

For the reasons stated above I think the screening still doesn't meet BAT because it will increase the fibre load of the soil which would then be released by use of open conveyers, handpicking, dropping into storage piles. **As per above we've accepted it at Rowley provided it is adequately enclosed and abated – can we go back on it now?**

Any thoughts you have would be gratefully received and how this might fit into the use of the screen at Rowley Regis.

Kind regards

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

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

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Grange, Adam

From: Dunmore, Katie
Sent: 09 March 2022 10:56
To: Hall, Chris; Raynes, Graham
Cc: Wall, Clive
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

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Chris

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Sent: 24 February 2022 18:45
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Subject: FW: Daneshill Landfill. Asbestos soil screening and BAT 14

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What do you think?

Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B

Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

External: **020302 50600**

Internal: **30600**

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Grange, Adam

From: Wall, Clive
Sent: 07 March 2022 15:00
To: Hall, Chris; Raynes, Graham; Dunmore, Katie
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Hello

No change of stance for Edwin Richards. We rejected their second submission about enclosing the screener end of last year. They requested a meeting to discuss further as they said 'it is not clear what the expectation is for **all dust emissions from the screening operation are directed to an active abatement system...** or how it would practically be achieved given that it is a soil screen and materials must at some point exit from it whether that be off the end of a conveyor or taken from a stockpile.'

However I couldn't get Chris Lowe to respond to a meeting request and there has been no further communication. Perhaps they are trying to get it permitted elsewhere and then come back to us?

Clive

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 07 March 2022 13:31
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Wall, Clive <clive.wall@environment-agency.gov.uk>
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Katie and Graham

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Chris

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 24 February 2022 18:45
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
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See also notes below in red.

What do you think?

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Senior Permitting Officer, National Permitting Service - part of National Services E&B
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From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Sent: 24 February 2022 14:56

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: Daneshill Landfill. Asbestos soil screening and BAT 14

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Grange, Adam

From: Dunmore, Katie
Sent: 09 March 2022 11:44
To: Wall, Clive; Hall, Chris; Raynes, Graham
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Hi Clive,

No, FCC are not permitted to operate a waste filter at Rowley Regis and I think it is a compliance issue.

I've been all over the houses with this via biowaste leads in E&B and whether we can accept monitoring data collected from non-compliant sites, whether we should enforce the use of a standard filter media and CLO use be dealt with outside the permitting process (FCC have provided a list of sites using CLO filters without appropriate permits).

I was hoping we could get an Agency wide approach to permitting waste filters and compliance dealt with accordingly. Lots of concerns have been raised about the filters but I have received no advice on a way forward. Given this my TL has stated we need to take my application at face value and accept FCC's statements unless we can be sure they are lying and the data provided is from a normal filter.

Clive, if you have any compliance checks on their filters and you're sure its non-waste this will change things though.

Kind regards

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Sent: 09 March 2022 11:10
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>; Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Hello Katie,

As I have said previously, I'm not aware the biofilter is constructed from waste at Edwin Richards and cant see how the permit would allow it. How will this be incorporated into the Daneshill permit? Will there be a table with waste codes permitted to construct the biofilter from?

Clive

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 09 March 2022 10:56
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Cc: Wall, Clive <clive.wall@environment-agency.gov.uk>
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Hi All,

Thanks for your comments.

I don't feel able to consider the screener. Our guidance is simple on this, just stating the process needs to be enclosed and abated by HEPA filter which FCC have offered. However considering the wider asbestos proposals and the significant local opposition to these open air activities asbestos operations are not considered acceptable at Daneshill.


FCC's response doesn't offer any further assurance with regards to the asbestos storage and picking activities. Soils are still maintained in loose stockpiles with only tarpaulin covers etc.

Having discussed with my team the asbestos treatment activity will be refused in its entirety. Bioremediation will be permitted. This is the site where FCC propose to use a waste material bio filter (EWC 19 05 03). Based on the 18 months of monitoring data from Rowley Regis which they state is also waste we have agreed to permit this. An IC will be used however to ensure the filter is effective and media replaced if necessary.

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Grange, Adam

From: Tucker, Tania
Sent: 18 November 2021 14:04
To: Dunmore, Katie
Subject: RE: EWC 19 05 03 as a biofilter medium

Cheers for the update Katie.

I am going to have a chat with my colleagues (Kathy in biowaste) and my odour guru colleagues too. I may circulate to the odour network too. I share your unease.

Be very interested in the details of the sites it has been used – odd they don't seem to want to provide them?

Cheers Tan

Tania Tucker

E&B Senior Advisor (Non-hazardous & inert waste sector lead)

Environment Agency

tania.tucker@environment-agency.gov.uk

External: 020 302 56785 | Mobile: 07778052029

Working days: Monday to Friday



From: Dunmore, Katie
Sent: 18 November 2021 13:23
To: Tucker, Tania <tania.tucker@environment-agency.gov.uk>
Subject: EWC 19 05 03 as a biofilter medium

Hi Tania,

I've received the below response from FCC as to why 19 05 03 is considered a suitable biofilter medium and how it meets BAT.

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.

Considering they need to cover the filter medium to reduce the potential for odour doesn't fill me with confidence.

I've asked which sites have this type of biofilter. This was raised across centre by the PPO group and it hadn't come up before.

I'm slightly concerned about accepting evidence from previous sites. This Daneshill application almost entirely comprises evidence (which I can't verify) from their other sites that they consider evidences there is no risk of emissions. This is particularly stark for the lack of mitigation for asbestos soil treatment. Its proving tricky to assess.

Any further thoughts you have on the biofilter would be appreciated.

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
📧 katie.dunmore@environment-agency.gov.uk

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Grange, Adam

From: Dunmore, Katie
Sent: 29 November 2021 10:36
To: Tucker, Tania
Subject: RE: EWC 19 05 03 as a biofilter medium

Hi Tania,

FCC have confirmed three of their sites currently use 19 05 03 as biofilter medium; Edwin Richards Quarry EPR/HP3632RP, Maw Green Landfill and Welbeck Landfill.

I've looked at the Edwin Richards permit and the use of the medium is not included in the permit. This site has come up a lot during my determination as the operator wishes to use monitoring results taken at this site as a means to deviate from BAT with regards to capturing and containing diffuse emissions. We are disputing this.

We could however accept monitoring result from a filter as a means to permit an alternative medium. FCC have now also confirmed the AQ survey provided is based on CLO as a filter medium (although this is not stated in the report and other docs state woodchip)

I discussed the filter medium with Graham Raynes in Warrington. Graham hadn't heard of its use but suggested we could permit it with conditions.

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
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From: Tucker, Tania
Sent: 18 November 2021 14:04
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: EWC 19 05 03 as a biofilter medium

Cheers for the update Katie.

I am going to have a chat with my colleagues (Kathy in biowaste) and my odour guru colleagues too. I may circulate to the odour network too. I share your unease.

Be very interested in the details of the sites it has been used – odd they don't seem to want to provide them?

Cheers Tan
Tania Tucker
E&B Senior Advisor (Non-hazardous & inert waste sector lead)
Environment Agency

rania.tucker@environment-agency.gov.uk

External: 020 302 56785 | Mobile: 07778050209

Working days: Monday to Friday

Creating a better place
for people and wildlife



From: Dunmore, Katie

Sent: 18 November 2021 13:23

To: Tucker, Tania <rania.tucker@environment-agency.gov.uk>

Subject: EWC 19 05 03 as a biofilter medium

Hi Tania,

I've received the below response from FCC as to why 19 05 03 is considered a suitable biofilter medium and how it meets BAT.

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.

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I'm slightly concerned about accepting evidence from previous sites. This Daneshill application almost entirely comprises evidence (which I can't verify) from their other sites that they consider evidences there is no risk of emissions. This is particularly stark for the lack of mitigation for asbestos soil treatment. Its proving tricky to assess.

Any further thoughts you have on the biofilter would be appreciated.

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

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Grange, Adam

From: PSC Land
Sent: 18 August 2021 09:53
To: Dunmore, Katie
Subject: RE: FCC Recycling, Daneshill Landfill EPR/NP3538MF/V009 web advert

Morning Katie,

I'm just arranging the publishing for this, it should go live later today. Citizen Space link will be:
<https://consult.environment-agency.gov.uk/psc/dn22-8rb-fcc-recycling-uk-limited>

Joel

Joel Robson
Permitting Support Advisor
Permitting & Support Centre
Environment Agency



02030253785 / 33785 (jabber) / 07823899257

<http://www.smartsurvey.co.uk/s/NPScustomer/>

NOT PROTECTIVELY MARKED

From: Dunmore, Katie J
Sent: 18 August 2021 09:00
To: PSC Land <PSC@environment-agency.gov.uk>
Subject: FCC Recycling, Daneshill Landfill EPR/NP3538MF/V009 web advert

Hi P&SC,

I'm just checking as to whether the above web advert is live yet?

I don't want to miss when this happens as we have been notified by the local CC that this application is going to attract a lot of attention. We don't want to make it HPI at the moment but we have advised them that we would send the Citizen Space link over to allow comments in this way.

Could you let me know as soon as consultation opens 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
☎ 02030 254435 (internal 54435) mob: 07584 369561
✉ katie.dunmore@environment-agency.gov.uk

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Grange, Adam

From: Raynes, Graham
Sent: 26 April 2022 15:15
To: Dunmore, Katie; Hall, Chris
Subject: RE: FCC. Daneshill Landfill proposed STF EPR/NP3538MF/V009
Attachments: LIT 12001 - Notice of variation and consolidation single permit GR01.docm; LIT 11951 - Decision document variationGR01.docm

Hi Katie,

Sorry this has taken longer than I expected.

I've gone through the permit and DD – comments attached. I've included Chris as (a) there is the partial refusal issue regarding the asbestos process, and (b) there are some specific comments on the permit conditions around what we should be doing under the BATCs/BAT-AEL for the bioremediation monitoring. Chris – can you look at the relevant parts and comment?

Happy to chat through – perhaps we can set a time next week?

Regards
Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

External: **020302 50600**

Internal: **30600**

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

Sent: 14 April 2022 15:55

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: FCC. Daneshill Landfill proposed STF EPR/NP3538MF/V009

Hi Graham,

As discussed. FCC docs attached.

Kind regards

Katie Dunmore

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

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

mob: 07584 369561

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

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Grange, Adam

From: Dunmore, Katie
Sent: 05 May 2022 11:18
To: Raynes, Graham
Subject: RE: FCC. Daneshill Landfill proposed STF EPR/NP3538MF/V009

Hi Graham,

Thanks for this. I've just finished going through it.

I'll run the DD past legal.

Hopefully Chris can provide advice on the monitoring. I'm having a bit of a nightmare re-checking information on this. Some I took from templates and some from the application. I however accessed the application from EDRM which I no longer have and many docs have not transferred to DMS or temporary storage.

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 26 April 2022 15:15
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: RE: FCC. Daneshill Landfill proposed STF EPR/NP3538MF/V009

Hi Katie,

Sorry this has taken longer than I expected.

I've gone through the permit and DD – comments attached. I've included Chris as (a) there is the partial refusal issue regarding the asbestos process, and (b) there are some specific comments on the permit conditions around what we should be doing under the BATCs/BAT-AEL for the bioremediation monitoring. Chris – can you look at the relevant parts and comment?

Happy to chat through – perhaps we can set a time next week?

Regards
Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk
External: **020302 50600**
Internal: **30600**

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From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 14 April 2022 15:55
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: FCC. Daneshill Landfill proposed STF EPR/NP3538MF/V009

Hi Graham,

As discussed. FCC docs attached.

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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Grange, Adam

From: Dunmore, Katie
Sent: 23 May 2022 16:34
To: Turner, Martin
Subject: RE: Daneshill landfill STF permit variation
Attachments: Doc1.docx; 3982-CAU-XX-XX-DR-V-1813_S2-P04.pdf

Hi Martin,

I've enclosed a copy of the treatment pad design and separate wider site drainage pad. Surface waters are then captured in a sump and pumped to the treatment system. All waste operations area marked for occurring on these pads with the wider site hardstanding draining to the existing lagoon.

The above is the 4th drainage plan request which still doesn't have the hardstanding area labelled. Partly why I'm going with the IC's because after many times of asking its difficult to extract information.

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Turner, Martin <martin.turner@environment-agency.gov.uk>
Sent: 20 May 2022 13:48
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

Hi Katie

I hope you are well

An initial question – what is the impermeable pavement and sealed drainage going to look like?

What have they proposed?

Martin

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 17 May 2022 16:29
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: Daneshill landfill STF permit variation

Hi Martin,

The above variation is complete and I've attached the permit docs for your review. The highlighted sections in the permit are those added or amended as part of the variation.

We have included a couple of improvement conditions requiring the operator provided detailed evidence the biofilter is functioning correctly. We are permitting the use of EWC 19 05 03 based on the monitoring data they have provided for a similar site which is operating without issue. I'm awaiting a second opinion from E&B on the biofilter monitoring requirements but they are unlikely to change significantly.

We are permitting the STF treatment tonnage requested even though asbestos treatment is refused. The volume of waste itself wasn't a problem. The operator is however likely to revise the site layout given the refusal (which I haven't discussed with the yet). I'm therefore not trying them into any specific site layout plan at this time.

I haven't included dust or odour management plans in the Operating Techniques table. I don't think they are brilliant but are sufficient for permit determination. Dust was a particular issue due to the asbestos activity but given this is now not permitted and the site is within the landfill boundary dust from bioremediation is less of an issue. Similarly odour shouldn't be a concern given they are treating oily waste, this is however one of my queries regarding biofilter monitoring.

Please let me know if you have any questions.

Kind regards

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

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

mob: 07584 369561

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

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Grange, Adam

From: Dunmore, Katie
Sent: 12 October 2022 15:33
To: Jones, Rhidian
Subject: RE: Daneshill HPI comms to stakeholders


Hi Rhidian,

Could you let me know when this goes out please. I've spoken to P&SC and they can publish on the same day to ensure they co-inside with each other.

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Sent: 30 September 2022 09:16
To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: Daneshill HPI comms to stakeholders

Good morning Katie and Mel,

Please see the draft version of the correspondence we intend to send out to stakeholder regarding the permit variation at Danes Hill landfill site (EPR-NP3538MF).

If you have any comments please let me know.

Kind regards,

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

Grange, Adam

From: Dunmore, Katie
Sent: 18 October 2022 10:07
To: Jones, Rhidian
Subject: RE: Daneshill HPI comms to stakeholders

This looks to be the place but I've not previously considered where these are advertised.

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Sent: 18 October 2022 09:50
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill HPI comms to stakeholders

Katie,

Is this link where the decision document for the Daneshill permit will be published?

[Environmental permitting: waste, installations and radioactive substances activity notices of applications made - GOV.UK \(www.gov.uk\)](#)

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 18 October 2022 09:19
To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Subject: RE: Daneshill HPI comms to stakeholders

Hi Rhidian,

P&SC can publish on the same day as a request. We could co-ordinate a date when the draft is complete.

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>

Sent: 18 October 2022 09:11

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

Subject: RE: Daneshill HPI comms to stakeholders

Morning,

Before it goes out we will need to know where the decision document is published on the GOV.UK website, I don't know where this will be sorry. Do you know this?

I will discuss with our Comms and Engagement team once the Draft is complete and let you know when we are ready.

Rhidian

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

Sent: 12 October 2022 15:33

To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>

Subject: RE: Daneshill HPI comms to stakeholders

Hi Rhidian,

Could you let me know when this goes out please. I've spoken to P&SC and they can publish on the same day to ensure they co-inside with each other.

Kind regards

Katie Dunmore

Permitting Officer

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

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

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From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>

Sent: 30 September 2022 09:16

To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

[agency.gov.uk](https://www.environmentalagency.gov.uk)>

Subject: Daneshill HPI comms to stakeholders

Good morning Katie and Mel,

Please see the draft version of the correspondence we intend to send out to stakeholder regarding the permit variation at Danes Hill landfill site (EPR-NP3538MF).

If you have any comments please let me know.

Kind regards,

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

Grange, Adam

From: Bischer, Mel
Sent: 20 September 2022 09:31
To: Jones, Rhidian; Dunmore, Katie
Subject: RE: Daneshill HPI

Hi both

Just to confirm that we will need to advertise our draft decision which I believe will still be through Citizen Space. So once you've spoken with the team in Sheffield, Katie to understand timeframes, we can give you a heads up Rhidian so that area engagement is aligned. This normally lasts a month and involves publishing of the draft notice and decision document. In terms of stakeholders, the comms and engagement plan would normally come from the local team, as you are best placed to identify any stakeholders.

Kind regards
Mel

Mel Bischer CMgr MCMI
Principal Permitting Team Leader, National Permitting Service
Environment Agency | Horizon House, Deanery Road, Bristol BS1 5AH

melanie.bischer@environment-agency.gov.uk

Mobile: 07771 387706

Say my name (phonetic spelling): *Mel Bih-shuh*

Pronouns: she/her ([why is this here?](#))

[No need to thank me](#)

Working days: Monday to Friday



Incident management role: (Duty) National Base Controller



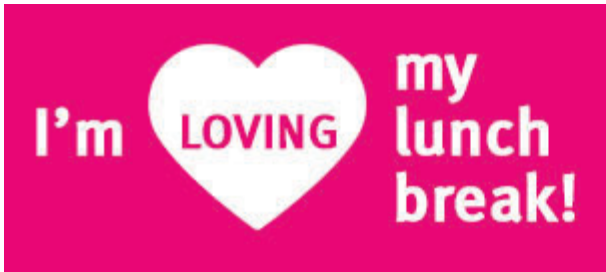
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Enabling, equipping and encouraging women
to reach their full potential in the workplace.



I've pledged to try and make the most of my lunch break to help boost my wellbeing.

#loveyourlunchbreak

From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Sent: 16 September 2022 08:24
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Subject: RE: Daneshill HPI

Thanks Katie much appreciated

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 15 September 2022 16:25
To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Cc: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Subject: RE: Daneshill HPI

Hi Rhidian,

The permit is complete and FCC are aware of our decision. They have reviewed the draft permit and have no comments regarding the bioremediation activity. We therefore assume they accept the monitoring requirements and conditions imposed.

FCC are unhappy with the refusal of the asbestos activity and did offer to house this within a building, requesting the determination be reopened. We have not agreed to this and the refusal stands. No further action is required on the permit.

Its almost a year since this application was advertised on Citizen Space, there wont be anything on there now. All application documents are on DMS. I shall upload anything I have tomorrow. Its many months since I worked on this application actively so I need to refresh my mind and check all relevant information is on there.


We had many local comments, details saved to DMS. I've however spoken to Mel and I don't believe we should respond to these directly for reasons of data protection etc. The comments raised have been address within the Decision Document.

I'm not aware of an active local group. I was contacted directly by a local resident and from what I remember of the conversation information was spread by word of mouth.

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Sent: 15 September 2022 10:33
To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: Daneshill HPI

Morning Mel and Katie,

I hope you are well. Our area Comms and engagement team have picked up this piece of work and we are currently working on a plan.

At this stage we would like to know the following –

- Conformation where we are at with the permitting decision
- Is there a link to anything relating to this on citizen space
- Where can we get the details of stakeholders which would need to be informed

I am really really sorry if these are basic daft questions but as I have mentioned this is a first for me!

Kind regards,

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

Grange, Adam

From: Redfearn, Stuart
Sent: 08 July 2021 11:33
To: Dunmore, Katie
Subject: RE: Daneshill Landfill Site, proposed new soil treatment facility. EPR/NP3538MF/V009

Hi Katie,

No I am not the local officer. This will be colleagues in our Regulated industry Team. I will forward it on to them (Heather Smith & Martin Turner).

Regards Stuart

From: Dunmore, Katie
Sent: 08 July 2021 11:30
To: Redfearn, Stuart <stuart.redfearn@environment-agency.gov.uk>
Subject: Daneshill Landfill Site, proposed new soil treatment facility. EPR/NP3538MF/V009

Hi Stuart,

I've received a variation application for the above site and I believe you are the local officer.

The operator proposes to install a STF treating up to 50,000 tonnes of hazardous and non-hazardous waste by bioremediation and picking asbestos containing soils. The application is not-duly made at the moment and its very light on detail. There's significant concern regarding the asbestos side of things as they also want to use a mechanical screener. Its early days though.

I was wondering if you were aware of the application and had any comments or concerns?

Customer engagement did contact me yesterday to confirm they have received comments from Nottm County Council that local resident are likely to want to comment on the proposal. It's a substantial variation and therefore once duly made we will be consulting the local authority and it will be advertised on Gov.UK which I think is sufficient to capture local opinion. If you have any local knowledge though it would be gratefully received.

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
📧 katie.dunmore@environment-agency.gov.uk

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Grange, Adam

From: Dunmore, Katie
Sent: 08 July 2021 12:19
To: Turner, Martin
Cc: Redfearn, Stuart; Smith, Heather
Subject: RE: Daneshill Landfill Site, proposed new soil treatment facility. EPR/NP3538MF/V009

Thanks Martin,

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From: Turner, Martin
Sent: 08 July 2021 12:01
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Redfearn, Stuart <stuart.redfearn@environment-agency.gov.uk>; Smith, Heather <heather.smith@environment-agency.gov.uk>
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Chris / Clive / Reena – Any thoughts on how we further respond with this in this area?”

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



From: Redfearn, Stuart

Sent: 08 July 2021 11:35

To: Smith, Heather <heather.smith@environment-agency.gov.uk>; Turner, Martin <martin.turner@environment-agency.gov.uk>

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

Subject: FW: Daneshill Landfill Site, proposed new soil treatment facility. EPR/NP3538MF/V009

Heather/Martin,

This was sent to me.

I have directed Katie to yourselves.

Regards Stuart

Stuart Redfearn

Technical Specialist (Landfill)

GHCL Team

East Midlands (EMD)

Direct Dial : 020302 253412
Mobile : 07802330156
Email : stuart.redfearn@environment-agency.gov.uk

FROM THE 1st JULY 2021 MY WORKING DAYS WILL ONLY BE TUESDAY, WEDNESDAY & THURSDAY(am)

From: Dunmore, Katie
Sent: 08 July 2021 11:30
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External: 020302 53332 |

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Grange, Adam

From: Redfearn, Stuart
Sent: 08 July 2021 11:33
To: Dunmore, Katie
Subject: RE: Daneshill Landfill Site, proposed new soil treatment facility. EPR/NP3538MF/V009

Hi Katie,

No I am not the local officer. This will be colleagues in our Regulated industry Team. I will forward it on to them (Heather Smith & Martin Turner).

Regards Stuart

From: Dunmore, Katie
Sent: 08 July 2021 11:30
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Grange, Adam

From: Turner, Martin
Sent: 08 July 2021 13:05
To: Dunmore, Katie
Subject: RE: Daneshill Landfill Site, proposed new soil treatment facility. EPR/NP3538MF/V009

Ok

Mart

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

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Working days: Monday to Friday



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Grange, Adam

From: Smith, Heather
Sent: 30 September 2021 06:10
To: Turner, Martin; Bird, Jamie
Cc: Dunmore, Katie
Subject: RE: Daneshill Landfill STF application

Hi Martin

It would be useful to know who the responses are from ie MPs, Environmental Groups or local residents to make the decision.

I have not been involved much with this so have little idea what the public interest is or the nature of the objections or if we are likely to get more interest as the determination process and on consultation of the permit.

I know it is down to Area and the Area Manager to sign off but further advice from Katie with an NPS background would be useful.

Sorry to be of little help. Would find a chat about this useful. I will give you a call later today.

Cheers
Heather

From: Turner, Martin
Sent: 29 September 2021 14:18
To: Bird, Jamie <Jamie.Bird@environment-agency.gov.uk>; Smith, Heather <heather.smith@environment-agency.gov.uk>
Cc: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: FW: Daneshill Landfill STF application

Hi

Further to my e mail on the 16 September 2021 – Any further thoughts on the matter below?

If you need an opinion I would say it probably should be

Martin

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



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From: Dunmore, Katie
Sent: 29 September 2021 13:27
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: Daneshill Landfill STF application

Hi Martin,

Just checking in with regards to the above. Have you had chance to consider if you want to run this as a HPI?

Citizen Space is now closed. We have received roughly 60 responses.

Kind regards

Katie Dunmore
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Grange, Adam

From: Dunmore, Katie
Sent: 26 May 2022 14:05
To: Turner, Martin
Subject: RE: Daneshill landfill STF permit variation

Hi Martin,

I believe the application docs reference the water treatment as non-hazardous treating less than 50m3. I did consider whether this should be a waste activity but given the treatment is only associated with the bioremediation I think its OK as a DAA. This is also in keeping with FCCs permit at Rowley Regis.

I've had some further advice on monitoring requirements for the biofilter. I haven't really got a clue what's appropriate as BAT is so woolly on bioremediation, hence why I'm leaning on E&B for more of a steer.

| | | | | | | |
|---|---|-----------------------------------|----------------------|---|----------------|--|
| Biofilter As shown on soil treatment activity layout plan?? | H ₂ S | Soil treatment facility biofilter | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 for sampling NIOSH 6013 for analysis * |
| | NH ₃ | | 20 mg/m ³ | | | EN ISO 21877 * |
| | Total volatile organic compounds (TVOC) | | No limit set | | | BS EN 12619 |
| | Particulate Matter (Dust) | | No limit set | | | EN 13284-1 |

E&B have also suggested odour units and speciated VOC. I have been advised however not to include these because of their complexity. H₂S and NH₃ is an alternative to OU and much more tangible to assess. I'm not sure of the chemistry as to why speciated VOC's is difficult, my PPO just advised not to go there.

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From: Turner, Martin <martin.turner@environment-agency.gov.uk>
Sent: 25 May 2022 14:48
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

Hi thanks for this

Sorry you're having a bit of a nightmare!

Sounds to me like they have thought about it which is good - could the treatment of the water potentially be haz waste treatment (oily water)? Is this something they have considered?

Martin

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 25 May 2022 11:14
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

Hi Martin,

Sorry, I took leave yesterday.


A new system is being installed within the STF footprint to treat waters arising from the bioremediation. The current location is to the north west. I'm trying to locate the details. Having a nightmare as all the application documents are on EDM which I can no longer access and they haven't transferred across to DMS or the transitional DMS folders.

The water treatment system itself is oil/water separation with carbon filtration. I've attached a Schedule 5 response I received from the operation. The earlier questions deal with the water treatment system and Q6 provides a schematic of the system. It should all be bundled as well.

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From: Turner, Martin <martin.turner@environment-agency.gov.uk>
Sent: 24 May 2022 08:28
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

That's ok – when you say treatment system do you mean the leachate lagoons or tanks? I think it's worth knowing as the leachate lagoons are not in a good state.

Mart

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 23 May 2022 16:34
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

Hi Martin,

I've enclosed a copy of the treatment pad design and separate wider site drainage pad. Surface waters are then captured in a sump and pumped to the treatment system. All waste operations area marked for occurring on these pads with the wider site hardstanding draining to the existing lagoon.

The above is the 4th drainage plan request which still doesn't have the hardstanding area labelled. Partly why I'm going with the IC's because after many times of asking its difficult to extract information.

Kind regards

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From: Turner, Martin <martin.turner@environment-agency.gov.uk>
Sent: 20 May 2022 13:48
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

Hi Katie

I hope you are well

An initial question – what is the impermeable pavement and sealed drainage going to look like?

What have they proposed?

Martin

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 17 May 2022 16:29
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: Daneshill landfill STF permit variation

Hi Martin,

The above variation is complete and I've attached the permit docs for your review. The highlighted sections in the permit are those added or amended as part of the variation.

We have included a couple of improvement conditions requiring the operator provided detailed evidence the biofilter is functioning correctly. We are permitting the use of EWC 19 05 03 based on the monitoring data they have provided for a similar site which is operating without issue. I'm awaiting a second opinion from E&B on the biofilter monitoring requirements but they are unlikely to change significantly.

We are permitting the STF treatment tonnage requested even though asbestos treatment is refused. The volume of waste itself wasn't a problem. The operator is however likely to revise the site layout given the refusal (which I haven't discussed with the yet). I'm therefore not trying them into any specific site layout plan at this time.

I haven't included dust or odour management plans in the Operating Techniques table. I don't think they are brilliant but are sufficient for permit determination. Dust was a particular issue due to the asbestos activity but given this is now not permitted and the site is within the landfill boundary dust from bioremediation is less of an issue. Similarly odour shouldn't be a concern given they are treating oily waste, this is however one of my queries regarding biofilter monitoring.

Please let me know if you have any questions.

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From: Turner, Martin <martin.turner@environment-agency.gov.uk>
Sent: 24 May 2022 08:28

To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

That's ok – when you say treatment system do you mean the leachate lagoons or tanks? I think it's worth knowing as the leachate lagoons are not in a good state.

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From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 23 May 2022 16:34
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

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Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Turner, Martin <martin.turner@environment-agency.gov.uk>
Sent: 20 May 2022 13:48
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill landfill STF permit variation

Hi Katie

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Grange, Adam

From: Dunmore, Katie
Sent: 25 May 2022 11:14
To: Turner, Martin
Subject: RE: Daneshill landfill STF permit variation
Attachments: Schedule 5 Reponse D.hill Final cmb.pdf

Hi Martin,

Sorry, I took leave yesterday.

A new system is being installed within the STF footprint to treat waters arising from the bioremediation. The current location is to the north west. I'm trying to locate the details. Having a nightmare as all the application documents are on EDM which I can no longer access and they haven't transferred across to DMS or the transitional DMS folders.

The water treatment system itself is oil/water separation with carbon filtration. I've attached a Schedule 5 response I received from the operation. The earlier questions deal with the water treatment system and Q6 provides a schematic of the system. It should all be bundled as well.

Kind regards

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Grange, Adam

From: Smith, Heather
Sent: 12 October 2021 13:03
To: Turner, Martin; Bird, Jamie
Cc: Haddock, Samantha; Dunmore, Katie
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Martin

Do we need to chat about this more?

Cheers
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From: Dunmore, Katie
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☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
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Martin Turner

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Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



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To: Haddock, Samantha
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

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From: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>
Sent: 28 July 2022 09:22
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Subject: FW: Daneshill asbestos treatment 8 Oct 2021

Hi both,
Here is some of the e-mail chain. We did have a call with them in which they decided they didn't want to take it any further.
Happy to discuss the detail of the call if needed.
We didn't do the form which might be me missing a part of the process, sorry if so.

Thanks

Samantha Haddock (She/Her)
Habitats Regulation Assessment Team
Team Leader | National Permitting Service | **Environment Agency** | Bristol
samantha.haddock@environment-agency.gov.uk | 07796997145
Please note I don't work on Mondays.

From: Haddock, Samantha
Sent: 13 October 2021 12:38
To: Smith, Heather <heather.smith@environment-agency.gov.uk>; Turner, Martin <martin.turner@environment-agency.gov.uk>; Bird, Jamie <Jamie.Bird@environment-agency.gov.uk>
Cc: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi all

I hope you are well sorry to jump in and I am sure you already know this but wanted to extend the offer of a call if you feel it is needed.

If there are 60 responses to the application it may be you want to consider it to be a High Public interest site. This would involved have a comms and engagement officer support you in making a communications plan and also completing the HPI form.

Information on comms and engagement is found here on the Sharepoint [Engagement Guidance - All Documents \(ea.gov\)](#) , [Environment Agency - Why we engage with others \(ea.gov\)](#)

The form has to be agreed by your AEM and then sent over to myself with a comms plan. This may not be extensive but might allow the public to have site of a decision at the minded to stage.

Please shout if I can help.

Thanks

Samantha Haddock

Permitting Team Leader (Bristol Installations)
National Permitting Service (Part of Operations – Regulation, Monitoring and Customer)
Environment Agency | Horizon House, Deanery Road, Bristol, BS1 5AH

My working days are Tuesday - Friday

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Mobile: 07796997145

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Creating a better place
for people and wildlife



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Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>
Sent: 28 July 2022 09:22
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Subject: FW: Daneshill asbestos treatment 8 Oct 2021

Hi both,
Here is some of the e-mail chain. We did have a call with them in which they decided they didn't want to take it any further.
Happy to discuss the detail of the call if needed.
We didn't do the form which might be me missing a part of the process, sorry if so.

Thanks

Samantha Haddock (She/Her)
Habitats Regulation Assessment Team
Team Leader | National Permitting Service | **Environment Agency** | Bristol
samantha.haddock@environment-agency.gov.uk | 07796997145
Please note I don't work on Mondays.

From: Haddock, Samantha
Sent: 13 October 2021 12:38
To: Smith, Heather <heather.smith@environment-agency.gov.uk>; Turner, Martin <martin.turner@environment-agency.gov.uk>; Bird, Jamie <Jamie.Bird@environment-agency.gov.uk>
Cc: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
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Working days: Monday to Friday



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Grange, Adam

From: Turner, Martin
Sent: 15 October 2021 10:39
To: Dunmore, Katie
Cc: Haddock, Samantha; Smith, Heather; Martin, Val; Candlin, Mark; Bird, Jamie
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hello Katie

Thanks for yours and Samantha's feedback on this matter

I have spoken to the customers and engagement team (Val Martin and Mark Candlin cc'd) and they have advised that a meeting should be set up to discuss this further

I understand that convention dictates that permitting set this up and should involve RI, C&E, T/L's for permitting and RI and NPS.

I am happy to attend but away the next few weeks

Kind regards

Martin

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I hope you are well

Thanks for your message - sorry for my delayed response as I have been off work – see attached - can you confirm whether there has been MP / Parish Council interest so I can complete the form.

Thanks

Martin

Martin Turner
Regulated Industry Officer
Environment Agency | Trentside Offices, Scarrington Road, West Bridgford,
Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk
External: 020302 53332 |

Working days: Monday to Friday



Grange, Adam

From: Bischer, Mel
Sent: 28 July 2022 17:04
To: Haddock, Samantha; Dunmore, Katie
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Thanks Sam. Are there any notes of the meeting?

Katie – you did mention a form, which I presume is the HPI form. Do we have even a draft version of this please?

Thanks
Mel

Mel Bischer CMgr MCMI
Principal Permitting Team Leader, National Permitting Service
Environment Agency | Horizon House, Deanery Road, Bristol BS1 5AH

melanie.bischer@environment-agency.gov.uk

Mobile: 07771 387706

Say my name (phonetic spelling): *Mel Bih-shuh*

Pronouns: she/her ([why is this here?](#))

[No need to thank me](#)

Working days: Monday to Friday



Incident management role: (Duty) National Base Controller



BAME
Network

Supporting
racial equality



Women's Network

Enabling, equipping and encouraging women
to reach their full potential in the workplace.

I'm  **LOVING** my
lunch
break!

I've pledged to try and make
the most of my lunch break to
help boost my wellbeing.

#loveyourlunchbreak

From: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>

Sent: 28 July 2022 09:22

To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Bischer, Mel <melanie.bischer@environment-agency.gov.uk>

Subject: FW: Daneshill asbestos treatment 8 Oct 2021

Hi both,

Here is some of the e-mail chain. We did have a call with them in which they decided they didn't want to take it any further.

Happy to discuss the detail of the call if needed.

We didn't do the form which might be me missing a part of the process, sorry if so.

Thanks

Samantha Haddock (She/Her)

Habitats Regulation Assessment Team

Team Leader | National Permitting Service | **Environment Agency** | Bristol

samantha.haddock@environment-agency.gov.uk | 07796997145

Please note I don't work on Mondays.

From: Haddock, Samantha

Sent: 13 October 2021 12:38

To: Smith, Heather <heather.smith@environment-agency.gov.uk>; Turner, Martin <martin.turner@environment-agency.gov.uk>; Bird, Jamie <Jamie.Bird@environment-agency.gov.uk>

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

Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi all

I hope you are well sorry to jump in and I am sure you already know this but wanted to extend the offer of a call if you feel it is needed.

If there are 60 responses to the application it may be you want to consider it to be a High Public interest site. This would involve have a comms and engagement officer support you in making a communications plan and also completing the HPI form.

Information on comms and engagement is found here on the Sharepoint [Engagement Guidance - All Documents \(ea.gov\)](#) , [Environment Agency - Why we engage with others \(ea.gov\)](#)

The form has to be agreed by your AEM and then sent over to myself with a comms plan. This may not be extensive but might allow the public to have site of a decision at the minded to stage.

Please shout if I can help.

Thanks

Samantha Haddock

Permitting Team Leader (Bristol Installations)

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

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

My working days are Tuesday - Friday

samantha.haddock@environment-agency.gov.uk

External: 02030 254710

Mobile: 07796997145

From: Smith, Heather <heather.smith@environment-agency.gov.uk>
Sent: 12 October 2021 13:03
To: Turner, Martin <martin.turner@environment-agency.gov.uk>; Bird, Jamie <Jamie.Bird@environment-agency.gov.uk>
Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Martin

Do we need to chat about this more?

Cheers
Heather

From: Dunmore, Katie
Sent: 11 October 2021 17:38
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Smith, Heather <heather.smith@environment-agency.gov.uk>
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi Martin,

What is your plan for additional engagement with the local community? We change the applicant an additional £500 to cover the additional costs of this and before we go forward we need to understand how this is going to done.

Word of mouth has already been pretty strong in the village. I have the details of one resident who contacted me via the call centre and requested the original Citizen Space advert be extended. I've noted one of the responses also details they received notification via a newspaper. I'm not sure if this is something to do with the planning application which initially alerted the locals or if someone in the village has taken steps to publicise it.

I'll be going through all the responses in greater detail this week.

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
☎ 02030 254435 (internal 54435) mob: 07584 369561
📧 katie.dunmore@environment-agency.gov.uk

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<http://www.smartsurvey.co.uk/s/NPScustomer/>



From: Turner, Martin
Sent: 11 October 2021 16:31
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Smith, Heather

[<heather.smith@environment-agency.gov.uk>](mailto:heather.smith@environment-agency.gov.uk)

Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi Katie

Thanks for your response - I will do though I'm not really sure what the question is?

Mart

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



From: Dunmore, Katie

Sent: 08 October 2021 11:27

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Cc: Smith, Heather <heather.smith@environment-agency.gov.uk>; Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>

Subject: RE: Daneshill asbestos treatment 8 Oct 2021

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I haven't gone through the responses in detail yet.

Is it worthwhile setting up a call with my TL regarding this? Just considering what the comms plan will be.

Kind regards

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

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From: Turner, Martin
Sent: 08 October 2021 10:16
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Smith, Heather <heather.smith@environment-agency.gov.uk>
Subject: Daneshill asbestos treatment 8 Oct 2021

Hi Katie

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martin.turner@environment-agency.gov.uk

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Working days: Monday to Friday



Creating a better place
for people and wildlife



Grange, Adam

From: Jones, Rhidian
Sent: 16 September 2022 08:24
To: Dunmore, Katie
Cc: Bischer, Mel
Subject: RE: Daneshill HPI

Thanks Katie much appreciated

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 15 September 2022 16:25
To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Cc: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Subject: RE: Daneshill HPI

Hi Rhidian,

The permit is complete and FCC are aware of our decision. They have reviewed the draft permit and have no comments regarding the bioremediation activity. We therefore assume they accept the monitoring requirements and conditions imposed.

FCC are unhappy with the refusal of the asbestos activity and did offer to house this within a building, requesting the determination be reopened. We have not agreed to this and the refusal stands. No further action is required on the permit.

Its almost a year since this application was advertised on Citizen Space, there wont be anything on there now. All application documents are on DMS. I shall upload anything I have tomorrow. Its many months since I worked on this application actively so I need to refresh my mind and check all relevant information is on there.

We had many local comments, details saved to DMS. I've however spoken to Mel and I don't believe we should respond to these directly for reasons of data protection etc. The comments raised have been address within the Decision Document.

I'm not aware of an active local group. I was contacted directly by a local resident and from what I remember of the conversation information was spread by word of mouth.

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

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From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>

Sent: 15 September 2022 10:33

To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Turner, Martin <martin.turner@environment-agency.gov.uk>

Subject: Daneshill HPI

Morning Mel and Katie,

I hope you are well. Our area Comms and engagement team have picked up this piece of work and we are currently working on a plan.

At this stage we would like to know the following –

- Conformation where we are at with the permitting decision
- Is there a link to anything relating to this on citizen space
- Where can we get the details of stakeholders which would need to be informed

I am really really sorry if these are basic daft questions but as I have mentioned this is a first for me!

Kind regards,

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

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07468 369970

Grange, Adam

From: Jones, Rhidian
Sent: 18 October 2022 09:50
To: Dunmore, Katie
Subject: RE: Daneshill HPI comms to stakeholders

Katie,

Is this link where the decision document for the Daneshill permit will be published?

[Environmental permitting: waste, installations and radioactive substances activity notices of applications made - GOV.UK \(www.gov.uk\)](#)

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 18 October 2022 09:19
To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Subject: RE: Daneshill HPI comms to stakeholders

Hi Rhidian,

P&SC can publish on the same day as a request. We could co-ordinate a date when the draft is complete.

Kind regards

Katie Dunmore
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✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
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To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: Daneshill HPI comms to stakeholders

Good morning Katie and Mel,

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If you have any comments please let me know.

Kind regards,

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External: 020302 53332 |

Working days: Monday to Friday



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Martin Turner
Regulated Industry Officer
Environment Agency | Trentside Offices, Scarrington Road, West Bridgford,
Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk
External: 020302 53332 |

Working days: Monday to Friday



Grange, Adam

From: Hall, Chris
Sent: 18 May 2022 08:50
To: Raynes, Graham; Dunmore, Katie
Cc: Chesney, Pete
Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham, Katie

I agree that talking with Abraham would be helpful.

My thoughts:

We should base monitoring on the likely emissions from the process.

We should base the limits on the BAT-AETs first which will be mandatory. Then for the other emissions we should base the limit on whether it is necessary to control the emission. The H1 might be the mechanism to do this.

Thus for biological treatment of soils* (not really thought of it as a mechanical biological treatment as it is not put into a mechanical device that turns it or pressurises it – the forced air flow is more related to the abatement than the treatment), they need to monitor for **odour** but they can alternatively monitor for **H₂S** and **NH₃**.

If the contaminant in the waste is oil or other organics then monitoring for TVOC and speciated should be done – there is no mandatory AEL so we could set a limit based on the H1 (either based on real data or on data collected via an improvement condition to do the H1) which could even determine that there is no need for a limit?

We are always going to suspect that particulate matter (dust) could be an issue but again no mandatory BAT-AEL. Where a limit is given it is usually 5 mg/m³ so we could simply go with that as a starting point. Otherwise do we go with the H1 (either based on real data or on data collected via an improvement condition to do the H1)?

So:

| | | | | | | |
|---|---|------------------|--|--|-------------------|----------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | Limit contrived from H1 immediate OR Limit contrived from H1 done from improvement condition OR No limit set?? | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
|---|---|------------------|--|--|-------------------|----------------|

| | | | | | | |
|--|---------------------------|--|---|---|----------------|--------------|
| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 |
| | Odour | | 1000 ouE/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | EN 13725 |
| | Particulate Matter (Dust) | | 5mg/m ³ OR Limit contrived from H1 immediate OR Limit contrived from H1 done from improvement condition OR No limit set?? | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | EN 13284-1 |

* All biological treatment processes for hazardous waste must be actively controlled for emissions – there should be no passive venting of emissions.

What do you think?

I probably need to accelerate the outlines for each of the treatment processes given in the BAT conclusions but there are issues with each of them which are confounding matters.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169
 I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 17 May 2022 11:47
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Hi Katie,

Yes the Healthcare permit review was done first so the permit is in the correct format for the BATCs. Total and speciated VOCs are the 2 test methods mentioned in our MCERTS guidance so better than specifying BTEX or something like that.

NH3 is an analogue for odour – this process shouldn't be too odorous as there are primarily traces of oil in soil rather than a fully biodegradable process like composting.

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I think it would be worth sharing with Abraham for a biowaste view on limits and process monitoring for biofilters too.

Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

External: **020302 50600**

Internal: **30600**

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

Sent: 16 May 2022 16:12

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: Biofilter monitoring at Daneshill Landfill

Graham,

I've revised the FCC soil treatment facility permit with your comments, many thanks for these. I'd just like to check I'm on the right track with the biofilter monitoring which I think may be subject to scrutiny.

I've included TVOC and speciated VOC as you suggest from the healthcare template. Why do we use the healthcare template? I see the limit is the same as that detailed for physicochemical treatment of waste with calorific value.. Is it adapted from that?

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| | NH ₃ | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |
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Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
 mob: 07584 369561
 8 katie.dunmore@environment-agency.gov.uk

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Grange, Adam

From: Raynes, Graham
Sent: 17 May 2022 14:00
To: Dunmore, Katie
Subject: RE: Biofilter monitoring at Daneshill Landfill

Hi Katie,

No problem – sounds like we just take what we need for the biofilter if they don't want to be involved. Lets see what Chris thinks.

Graham

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 17 May 2022 13:49
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Thanks Graham,

I did speak to Abraham and Cathy Nichols earlier on in the permit determination, neither wanted to be involved passing it over to waste.

Everyone hated the CLO biofilter but couldn't come up with any ideas given the monitoring data provided. I'm therefore a bit nervous of getting others involved again at this stage. Hopefully Chris can provide further clarification or we go with the tighter TVOC. Hopefully it won't be an issue with the operator as they had proposed monthly monitoring of the previous parameters.

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From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 17 May 2022 11:47
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Hi Katie,

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Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

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External: **020302 50600**

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

Sent: 16 May 2022 16:12

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

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Kind regards

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

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Grange, Adam

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Sent: 17 May 2022 13:49
To: Raynes, Graham
Subject: RE: Biofilter monitoring at Daneshill Landfill

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Sent: 17 May 2022 11:47
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

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Grange, Adam

From: Raynes, Graham
Sent: 17 May 2022 11:47
To: Dunmore, Katie; Hall, Chris
Subject: RE: Biofilter monitoring at Daneshill Landfill

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Sent: 16 May 2022 16:12
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Grange, Adam

From: Chesney, Pete
Sent: 19 May 2022 09:34
To: Hall, Chris; Raynes, Graham
Cc: Dunmore, Katie
Subject: RE: Biofilter monitoring at Daneshill Landfill

Sorry, catching up on all the emails!

It seems totally bizarre to not have monitoring and limits for TVOCs on biological treatment of soils – e.g. biopiles etc. I guess dust from the biological treatment process (biopiles etc.) is perhaps less likely to be a concern – dust would perhaps be more of an issue from the tipping/removal of the soil before and after the process, which I guess wouldn't be directed to the point source emission anyway – e.g. if they've not yet put in/or have removed the gas extraction pipes etc.

If they have any mechanical treatment before or after the biological process (crushing/screening etc.), presumably we could apply the mechanical/or mechanical-biological AELs to any emissions from these processes?

Can't we apply the BAT AELs for dust/VOCs anyway, even if they're not "mandatory BAT AELs" – i.e. as benchmarks emission limits, because we think they're appropriate and will ensure emissions are controlled/abated in line with BAT in general? Similar to the way we're looking to apply relevant BAT AELs to waste operations, or the way we've applied emission limits to healthcare facilities, even though (strictly speaking) no AELs directly apply from the BATCs?

Pete

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 19 May 2022 09:25
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham thanks again.

I find the whole thing quite maddening. I am confused that soil washing which is a wet process has a dust monitoring requirement but biological treatment of soil which is a dry process does not. It is also odd that the mandatory monitoring for soil treatment is odour or NH₃/H₂S when only one of our existing permits includes this.

It would be unfortunate that we had less control over emissions after the permit review than before. I would be loath to remove too much monitoring for those sites that already have it but it would be good to get consistency across every site doing soil treatment. Not sure it is worth monitoring for each of TVOC TPH, BTEX, PAHs and TVOC 15 but it is worth getting all sites to monitor for TVOC and speciated VOCs to give us some consistency across each site.

This is a suggestion for emission limits for biological soil treatment. Could be run past the monitoring/emissions experts.

| Emission point ref. & location | Source | Parameter | Limit (incl |
|--------------------------------|--------|-----------|-------------|
|--------------------------------|--------|-----------|-------------|

| | | | |
|--|--|---|--|
| <p>Description of the emission point including its abatement</p> <p>Example: Soil treatment biofilter as shown on the layout plan in Schedule 7 as A1.</p> | <p>Soil treatment filter biofilter</p> | Odour (Note 1) | 1000 ouE |
| | | H ₂ S (Note 1) | No limit s |
| | | NH ₃ (Note 1) | 20 mg/m ³ |
| | | Total volatile organic compounds (TVOC) | No limit s |
| | | Speciated VOCs | Limit cont immediat OR Limit cont done from condition |
| Particulate Matter (Dust) | No limit s | | |

Note 1 The monitoring of NH₃ and H₂S can be used as an alternative to the monitoring of the odour concentration. [Do we le

* These standards are taken from biowaste treatment permit for Biogen [Biowaste Treatment Permit Review - Permit Issued](#)

Abatement combinations

Adsorption
 Biofilter
 Fabric filter
 Thermal oxidation
 Wet scrubbing

Any help is welcomed – we need to bottom this out.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169

I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 18 May 2022 15:54
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Good spot – so this is definitely biological treatment but according to that table not MBT. It then refers to section 5.6 of the BRef, but that just leaves us up in the air as soil bioremediation isn't followed through into the BATCs – maybe they just gave up at that point?

So according to biological BATCs we should have for BAT-AELs:
 NH3 or odour

Plus any ELVs for other speciated contaminants in the inventory of emissions (e.g. Benzene if these are an issue (via usual H1 approach)).

And monitoring:
 NH3 or odour
 H2S

Plus speciated VOC for any other ELV, subject to H1 etc.

No dust or TVOCs though with this though.

The only part of 5.6 (ignoring thermal desorption as it's so dissimilar) to get into the BATC is soil washing – perhaps use this as a guide too? That wouldn't include any more BAT-AELs, but would include Dust and TVOC monitoring under BAT8.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 18 May 2022 14:16
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Table 4.1 in the BRef says:

Table 4.1: Biological treatments of waste

| Biological treatment | Brief description | Included in this document? |
|--|---|---|
| Aerobic treatment (including composting) | Biological decomposition of the organic content of wastes. Applied to solid waste, waste waters, bioremediation and to sludge and soil contaminated with oil. Composting consists of building piles of waste (windrows) to encourage the aerobic biodegradation of organic solids, producing a humic substance valuable as a soil conditioner or a growing media constituent. | See Section 4.2. Only <i>ex situ</i> bioremediation of contaminated soil is covered in this document (see Section 5.6) |

It specifically includes soil contaminated with oil (ex situ soil only).

We do end up with only the one effective mandatory BAT-AEL (H₂S/NH₃ or odour concentration). We can control the likely emissions from the process with emission limits -

since we suspect dust and TVOC we monitor for them too and for dust shoehorn in a dust limit.

Looking at the existing permits we have some TVOC monitoring may not be a shock.

Note Dunton Technologies, Liverpool was given the monitoring as if it were MBT.

Dust is not universal in existing permits.

2 permits have no emissions monitoring at all.

| Operator | Site | Treatment Process or storage associated process | Description treatment i |
|-----------------------------------|--|---|--|
| Biogenie Site Remediation Limited | Fawley Remediation Treatment and Recovery Facility - EPR/ZP3133RH | Biological treatment of waste | Bioremediation of hazard recovery. |
| Brett Aggregates Limited | Hithermoor Recycling And Recovery Facility - EPR/AB3006CE | Biological treatment of waste | Bioremediation of hazard recovery (S5.3) Bioremediation of non-h and recovery (S5.4) |
| Dunton Environmental Limited | Horseley Field Waste Treatment Facility EPR/BP3331DD | Biological treatment of waste | Ex-situ treatment of wa |
| Dunton Technologies Limited | Ellesmere Port Waste Treatment Facility | Biological treatment of waste | Biological treatment of f (enclosed biopiles, force |
| Highfield Environmental Limited | Waste Treatment Facility at ICI (Teesport) No3 Landfill EPR/DP3531DS | Biological treatment of waste | Biological treatment - bi waste. Biological treatment - bi waste. |
| Keltbray AWS Limited | Mohawk Wharf Recycling Facility EPR/FP3092LH | Biological treatment of waste | Bioremediation of hazard Bioremediation of non-h allowed too). |
| Mick George Ltd | Woodhatch Farm WTS EPR/EP3038VB | Biological treatment of waste | Biological treatment of s and low VOC contamina Biological treatment of s and low VOC contamina |

| | | | |
|-------------------------------------|------------------------------|-------------------------------|--|
| Waste Recycling group (Central) Ltd | ERQ - STC, EPR/HP3632RP/V002 | Biological treatment of waste | Bioremediation process Bioremediation process Bioremediation process disposal. Bioremediation process recovery. |
|-------------------------------------|------------------------------|-------------------------------|--|

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169

I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Sent: 18 May 2022 12:12

To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>

Subject: RE: Biofilter monitoring at Daneshill Landfill

I would say it falls more biological than physchem, if we are saying the treatment is bugs biodegrading the organic contaminants. There is no chemical reactions to speak of. For physical treatment – turning/incorporation of organics, (+volatilisation?)

If we classify it as mechanical biological treatment we get ELVs for:

BAT-associated emission levels (BAT-AELs) for channelled NH₃, odour, dust and TVOC emissions to air from the biological treatment of waste

| Parameter | Unit | BAT-AEL (Average over the sampling period) | Waste treatment process |
|---|----------------------------------|---|--|
| NH ₃ ⁽¹⁾ ⁽²⁾ | mg/Nm ³ | 0,3-20 | All biological treatments of waste |
| Odour concentration ⁽¹⁾ ⁽²⁾ | ou _e /Nm ³ | 200-1 000 | |
| Dust | mg/Nm ³ | 2-5 | Mechanical biological treatment of waste |
| TVOC | mg/Nm ³ | 5-40 ⁽³⁾ | |

⁽¹⁾ Either the BAT-AEL for NH₃ or the BAT-AEL for the odour concentration applies.

⁽²⁾ This BAT-AEL does not apply to the treatment of waste mainly composed of manure.

⁽³⁾ The lower end of the range can be achieved by using thermal oxidation.

Plus monitoring for the above (NH₃ or odour) and H₂S.

MBT is defined as:

| | |
|--|---|
| Mechanical biological treatment (MBT) | Treatment of mixed solid waste combining mechanical treatment with biological treatment such as aerobic or anaerobic treatment. |
|--|---|

Not looked at the Bref though not sure if this stretches the definition of MBT? To me it would seem a specialist sub category or it.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>

Sent: 18 May 2022 11:23

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>

Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham

The BAT conclusions are more tricky to negotiate than I would like.

If we say that biological treatment of soils is “Biological treatment of waste” then BAT is to monitor for H₂S/NH₃ or odour concentration in accordance with BAT 34 and Table 6.7.

We could say that this process is both “Biological treatment of waste” and “Physico-chemical treatment of solid and/or pasty waste” which would add in Dust but I think we can add in dust anyway.

We could say that this process is both ““Biological treatment of waste” and “Physico-chemical treatment of waste with calorific value” and “Physico-chemical treatment of solid and/or pasty waste” which add in a mandatory 30 mg/m³ for TVOC.

I would like biological soil treaters to monitor for TVOC but we may not be able to set limits.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169

I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Sent: 18 May 2022 10:11

To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>

Subject: RE: Biofilter monitoring at Daneshill Landfill

Thanks Chris,

So we are saying there are no mandatory BAT-AELs for biological treatment of haz soils – bit confused. If mandatory TVOC limit would be needed?

I would be careful about setting limits for odour – the monitoring is expensive and we have previously only put limits in in exceptional cases. NH₃ may be simpler.

There is no way to put TVOC through H1 – would have to use a proxy like benzene as a worst case. We can set limits on individual substance if H1 shows an issue. I would have to look at the rationale behind how we set those as I'm not too familiar – usually we take our limits from the sector guidance/ Bref if needed, so not sure how we would set a particular limits without those.

OK with dust limit.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 18 May 2022 08:50
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham, Katie

I agree that talking with Abraham would be helpful.

My thoughts:

We should base monitoring on the likely emissions from the process.

We should base the limits on the BAT-AETs first which will be mandatory. Then for the other emissions we should base the limit on whether it is necessary to control the emission. The H1 might be the mechanism to do this.

Thus for biological treatment of soils* (not really thought of it as a mechanical biological treatment as it is not put into a mechanical device that turns it or pressurises it – the forced air flow is more related to the abatement than the treatment), they need to monitor for **odour** but they can alternatively monitor for **H₂S** and **NH₃**.

If the contaminant in the waste is oil or other organics then monitoring for TVOC and speciated should be done – there is no mandatory AEL so we could set a limit based on the H1 (either based on real data or on data collected via an improvement condition to do the H1) which could even determine that there is no need for a limit?

We are always going to suspect that particulate matter (dust) could be an issue but again no mandatory BAT-AEL. Where a limit is given it is usually 5 mg/m³ so we could simply go with that as a starting point. Otherwise do we go with the H1 (either based on real data or on data collected via an improvement condition to do the H1)?

So:

| | | | | | | | | |
|---|---|---------------|---|---|----------------|-------------|----------------|--------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | Limit contrived from H1 immediate OR Limit contrived from H1 done from improvement condition OR No limit set?? | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 | | |
| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | | | Every 6 months | CEN TS 13649 |
| | Odour | | 1000 ouE/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | | | Every 6 months | EN 13725 |
| | Particulate Matter (Dust) | | 5mg/m ³ OR Limit contrived from H1 immediate OR Limit contrived from H1 done from improvement condition OR No limit set?? | Average value of 3 consecutive measurements of at least 30 minutes each | | | Every 6 months | EN 13284-1 |

* All biological treatment processes for hazardous waste must be actively controlled for emissions – there should be no passive venting of emissions.

What do you think?

I probably need to accelerate the outlines for each of the treatment processes given in the BAT conclusions but there are issues with each of them which are confounding matters.

Dr Chris Hall
Senior Advisor

**Environment Agency
Environment & Business**

Tel: 02030 251169

I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 17 May 2022 11:47
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Hi Katie,

Yes the Healthcare permit review was done first so the permit is in the correct format for the BATCs. Total and speciated VOCs are the 2 test methods mentioned in our MCERTS guidance so better than specifying BTEX or something like that.

NH3 is an analogue for odour – this process shouldn't be too odorous as there are primarily traces of oil in soil rather than a fully biodegradable process like composting.

Chris is working on the Chem waste template so I've copied him in – Chris have you given any thought yet to soil treatment? Looking at the process – should limits be based on those given in Table 6.7 for biological treatment of waste for this type of process? I would expect it fits into mechanical biological as it has forced air flow under suction? Has a slightly higher TVOC (40mg/m3) than phys-chem. Could do with your thoughts on how NH3, Odour and H2S fit into the picture. Maybe go with NH3 limit alone?

I think it would be worth sharing with Abraham for a biowaste view on limits and process monitoring for biofilters too.

Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

External: **020302 50600**

Internal: **30600**

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From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 16 May 2022 16:12

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: Biofilter monitoring at Daneshill Landfill

Graham,

I've revised the FCC soil treatment facility permit with your comments, many thanks for these. I'd just like to check I'm on the right track with the biofilter monitoring which I think may be subject to scrutiny.

I've included TVOC and speciated VOC as you suggest from the healthcare template. Why do we use the healthcare template? I see the limit is the same as that detailed for physicochemical treatment of waste with calorific value.. Is it adapted from that?

I've also include NH3 with the limit 20mg/m3. Odour is also mentioned but do we not include as adding NH3. H2S is also detailed as a requirement however is this unlikely to arise from the bioremediation process?

| | | | | | | |
|---|---|---------------|----------------------|---|----------------|--------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | 30 mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 |
| | NH ₃ | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |
| | Dust | | 5mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |

Kind regards

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

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

mob: 07584 369561

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

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Grange, Adam

From: Haddock, Samantha
Sent: 13 October 2021 12:38
To: Smith, Heather; Turner, Martin; Bird, Jamie
Cc: Dunmore, Katie
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi all

I hope you are well sorry to jump in and I am sure you already know this but wanted to extend the offer of a call if you feel it is needed.

If there are 60 responses to the application it may be you want to consider it to be a High Public interest site. This would involved have a comms and engagement officer support you in making a communications plan and also completing the HPI form.

Information on comms and engagement is found here on the Sharepoint [Engagement Guidance - All Documents \(ea.gov\)](#) , [Environment Agency - Why we engage with others \(ea.gov\)](#)

The form has to be agreed by your AEM and then sent over to myself with a comms plan. This may not be extensive but might allow the public to have site of a decision at the minded to stage.

Please shout if I can help.

Thanks

Samantha Haddock

Permitting Team Leader (Bristol Installations)
National Permitting Service (Part of Operations – Regulation, Monitoring and Customer)
Environment Agency | Horizon House, Deanery Road, Bristol, BS1 5AH

My working days are Tuesday - Friday

samantha.haddock@environment-agency.gov.uk

External: 02030 254710

Mobile: 07796997145

From: Smith, Heather <heather.smith@environment-agency.gov.uk>
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To: Turner, Martin <martin.turner@environment-agency.gov.uk>; Bird, Jamie <Jamie.Bird@environment-agency.gov.uk>
Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Martin

Do we need to chat about this more?

Cheers
Heather

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

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Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Smith, Heather <heather.smith@environment-agency.gov.uk>
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Mart

Martin Turner
Regulated Industry Officer
Environment Agency | Trentside Offices, Scarrington Road, West Bridgford,
Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk
External: 020302 53332 |

Working days: Monday to Friday



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for people and wildlife



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Cc: Smith, Heather <heather.smith@environment-agency.gov.uk>; Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>
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Sent: 08 October 2021 10:16
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Smith, Heather <heather.smith@environment-agency.gov.uk>
Subject: Daneshill asbestos treatment 8 Oct 2021

Hi Katie

I hope you are well

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Thanks

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martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



Grange, Adam

From: Dunmore, Katie
Sent: 28 July 2022 09:32
To: Haddock, Samantha
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

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From: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>
Sent: 28 July 2022 09:22
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Subject: FW: Daneshill asbestos treatment 8 Oct 2021

Hi both,
Here is some of the e-mail chain. We did have a call with them in which they decided they didn't want to take it any further.
Happy to discuss the detail of the call if needed.
We didn't do the form which might be me missing a part of the process, sorry if so.

Thanks

Samantha Haddock (She/Her)
Habitats Regulation Assessment Team
Team Leader | National Permitting Service | **Environment Agency** | Bristol
samantha.haddock@environment-agency.gov.uk | 07796997145
Please note I don't work on Mondays.

From: Haddock, Samantha
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mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>
Sent: 28 July 2022 09:22
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Subject: FW: Daneshill asbestos treatment 8 Oct 2021

Hi both,
Here is some of the e-mail chain. We did have a call with them in which they decided they didn't want to take it any further.
Happy to discuss the detail of the call if needed.
We didn't do the form which might be me missing a part of the process, sorry if so.

Thanks

Samantha Haddock (She/Her)
Habitats Regulation Assessment Team
Team Leader | National Permitting Service | **Environment Agency** | Bristol
samantha.haddock@environment-agency.gov.uk | 07796997145
Please note I don't work on Mondays.

From: Haddock, Samantha
Sent: 13 October 2021 12:38
To: Smith, Heather <heather.smith@environment-agency.gov.uk>; Turner, Martin <martin.turner@environment-agency.gov.uk>; Bird, Jamie <Jamie.Bird@environment-agency.gov.uk>
Cc: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
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Kind regards

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Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk
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Working days: Monday to Friday



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martin.turner@environment-agency.gov.uk

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Grange, Adam

From: Turner, Martin
Sent: 15 October 2021 10:39
To: Dunmore, Katie
Cc: Haddock, Samantha; Smith, Heather; Martin, Val; Candlin, Mark; Bird, Jamie
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hello Katie

Thanks for yours and Samantha's feedback on this matter

I have spoken to the customers and engagement team (Val Martin and Mark Candlin cc'd) and they have advised that a meeting should be set up to discuss this further

I understand that convention dictates that permitting set this up and should involve RI, C&E, T/L's for permitting and RI and NPS.

I am happy to attend but away the next few weeks

Kind regards

Martin

Martin Turner

Regulated Industry Officer

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martin.turner@environment-agency.gov.uk

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for people and wildlife**



Grange, Adam

From: Haddock, Samantha
Sent: 13 October 2021 12:38
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Cc: Dunmore, Katie
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

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Grange, Adam

From: Jones, Rhidian
Sent: 18 October 2022 09:11
To: Dunmore, Katie
Subject: RE: Daneshill HPI comms to stakeholders

Morning,

Before it goes out we will need to know where the decision document is published on the GOV.UK website, I don't know where this will be sorry. Do you know this?

I will discuss with our Comms and Engagement team once the Draft is complete and let you know when we are ready.

Rhidian

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 12 October 2022 15:33
To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Subject: RE: Daneshill HPI comms to stakeholders

Hi Rhidian,

Could you let me know when this goes out please. I've spoken to P&SC and they can publish on the same day to ensure they co-inside with each other.

Kind regards

Katie Dunmore
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From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Sent: 30 September 2022 09:16
To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: Daneshill HPI comms to stakeholders

Good morning Katie and Mel,

Please see the draft version of the correspondence we intend to send out to stakeholder regarding the permit variation at Danes Hill landfill site (EPR-NP3538MF).

If you have any comments please let me know.

Kind regards,

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

Grange, Adam

From: Bischer, Mel
Sent: 28 July 2022 17:04
To: Haddock, Samantha; Dunmore, Katie
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Thanks Sam. Are there any notes of the meeting?

Katie – you did mention a form, which I presume is the HPI form. Do we have even a draft version of this please?

Thanks
Mel

Mel Bischer CMgr MCMI
Principal Permitting Team Leader, National Permitting Service
Environment Agency | Horizon House, Deanery Road, Bristol BS1 5AH

melanie.bischer@environment-agency.gov.uk

Mobile: 07771 387706

Say my name (phonetic spelling): *Mel Bih-shuh*

Pronouns: she/her ([why is this here?](#))

[No need to thank me](#)

Working days: Monday to Friday



Incident management role: (Duty) National Base Controller



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Network

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Women's Network

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to reach their full potential in the workplace.

I'm **LOVING** my
lunch
break!

I've pledged to try and make
the most of my lunch break to
help boost my wellbeing.

#loveyourlunchbreak

From: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>

Sent: 28 July 2022 09:22

To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Bischer, Mel <melanie.bischer@environment-agency.gov.uk>

Subject: FW: Daneshill asbestos treatment 8 Oct 2021

Hi both,

Here is some of the e-mail chain. We did have a call with them in which they decided they didn't want to take it any further.

Happy to discuss the detail of the call if needed.

We didn't do the form which might be me missing a part of the process, sorry if so.

Thanks

Samantha Haddock (She/Her)

Habitats Regulation Assessment Team

Team Leader | National Permitting Service | **Environment Agency** | Bristol

samantha.haddock@environment-agency.gov.uk | 07796997145

Please note I don't work on Mondays.

From: Haddock, Samantha

Sent: 13 October 2021 12:38

To: Smith, Heather <heather.smith@environment-agency.gov.uk>; Turner, Martin <martin.turner@environment-agency.gov.uk>; Bird, Jamie <Jamie.Bird@environment-agency.gov.uk>

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

Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi all

I hope you are well sorry to jump in and I am sure you already know this but wanted to extend the offer of a call if you feel it is needed.

If there are 60 responses to the application it may be you want to consider it to be a High Public interest site. This would involve having a comms and engagement officer support you in making a communications plan and also completing the HPI form.

Information on comms and engagement is found here on the Sharepoint [Engagement Guidance - All Documents \(ea.gov\)](#) , [Environment Agency - Why we engage with others \(ea.gov\)](#)

The form has to be agreed by your AEM and then sent over to myself with a comms plan. This may not be extensive but might allow the public to have a say in a decision at the minded to stage.

Please shout if I can help.

Thanks

Samantha Haddock

Permitting Team Leader (Bristol Installations)

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

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

My working days are Tuesday - Friday

samantha.haddock@environment-agency.gov.uk

External: 02030 254710

Mobile: 07796997145

From: Smith, Heather <heather.smith@environment-agency.gov.uk>
Sent: 12 October 2021 13:03
To: Turner, Martin <martin.turner@environment-agency.gov.uk>; Bird, Jamie <Jamie.Bird@environment-agency.gov.uk>
Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Martin

Do we need to chat about this more?

Cheers
Heather

From: Dunmore, Katie
Sent: 11 October 2021 17:38
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Smith, Heather <heather.smith@environment-agency.gov.uk>
Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi Martin,

What is your plan for additional engagement with the local community? We change the applicant an additional £500 to cover the additional costs of this and before we go forward we need to understand how this is going to done.

Word of mouth has already been pretty strong in the village. I have the details of one resident who contacted me via the call centre and requested the original Citizen Space advert be extended. I've noted one of the responses also details they received notification via a newspaper. I'm not sure if this is something to do with the planning application which initially alerted the locals or if someone in the village has taken steps to publicise it.

I'll be going through all the responses in greater detail this week.

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
8 katie.dunmore@environment-agency.gov.uk

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From: Turner, Martin
Sent: 11 October 2021 16:31
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>; Smith, Heather

[<heather.smith@environment-agency.gov.uk>](mailto:heather.smith@environment-agency.gov.uk)

Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi Katie

Thanks for your response - I will do though I'm not really sure what the question is?

Mart

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



From: Dunmore, Katie

Sent: 08 October 2021 11:27

To: Turner, Martin <martin.turner@environment-agency.gov.uk>

Cc: Smith, Heather <heather.smith@environment-agency.gov.uk>; Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>

Subject: RE: Daneshill asbestos treatment 8 Oct 2021

Hi Martin,

I don't believe we have had anything from the Parish Council although Bassetlaw District have provided the email attached. This is particularly relevant to our determination. MPs comments also attached.

The majority of the 60 response are from local residents who were alerted via word of mouth. The County Council initially alerted residents following on from the planning process.

I haven't gone through the responses in detail yet.

Is it worthwhile setting up a call with my TL regarding this? Just considering what the comms plan will be.

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

☎ 02030 254435 (internal 54435) mob: 07584 369561

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

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From: Turner, Martin
Sent: 08 October 2021 10:16
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Smith, Heather <heather.smith@environment-agency.gov.uk>
Subject: Daneshill asbestos treatment 8 Oct 2021

Hi Katie

I hope you are well

Thanks for your message - sorry for my delayed response as I have been off work – see attached - can you confirm whether there has been MP / Parish Council interest so I can complete the form.

Thanks

Martin

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday



Creating a better place
for people and wildlife



Grange, Adam

From: Jones, Rhidian
Sent: 16 September 2022 08:24
To: Dunmore, Katie
Cc: Bischer, Mel
Subject: RE: Daneshill HPI

Thanks Katie much appreciated

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 15 September 2022 16:25
To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Cc: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>
Subject: RE: Daneshill HPI

Hi Rhidian,

The permit is complete and FCC are aware of our decision. They have reviewed the draft permit and have no comments regarding the bioremediation activity. We therefore assume they accept the monitoring requirements and conditions imposed.

FCC are unhappy with the refusal of the asbestos activity and did offer to house this within a building, requesting the determination be reopened. We have not agreed to this and the refusal stands. No further action is required on the permit.

Its almost a year since this application was advertised on Citizen Space, there wont be anything on there now. All application documents are on DMS. I shall upload anything I have tomorrow. Its many months since I worked on this application actively so I need to refresh my mind and check all relevant information is on there.


We had many local comments, details saved to DMS. I've however spoken to Mel and I don't believe we should respond to these directly for reasons of data protection etc. The comments raised have been address within the Decision Document.

I'm not aware of an active local group. I was contacted directly by a local resident and from what I remember of the conversation information was spread by word of mouth.

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
8 katie.dunmore@environment-agency.gov.uk

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From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>

Sent: 15 September 2022 10:33

To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Turner, Martin <martin.turner@environment-agency.gov.uk>

Subject: Daneshill HPI

Morning Mel and Katie,

I hope you are well. Our area Comms and engagement team have picked up this piece of work and we are currently working on a plan.

At this stage we would like to know the following –

- Conformation where we are at with the permitting decision
- Is there a link to anything relating to this on citizen space
- Where can we get the details of stakeholders which would need to be informed

I am really really sorry if these are basic daft questions but as I have mentioned this is a first for me!

Kind regards,

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

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Sent: 15 September 2022 16:25
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Katie Dunmore
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To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
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I am really really sorry if these are basic daft questions but as I have mentioned this is a first for me!

Kind regards,

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

Grange, Adam

From: Jones, Rhidian
Sent: 18 October 2022 09:50
To: Dunmore, Katie
Subject: RE: Daneshill HPI comms to stakeholders

Katie,

Is this link where the decision document for the Daneshill permit will be published?

[Environmental permitting: waste, installations and radioactive substances activity notices of applications made - GOV.UK \(www.gov.uk\)](#)

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 18 October 2022 09:19
To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Subject: RE: Daneshill HPI comms to stakeholders

Hi Rhidian,

P&SC can publish on the same day as a request. We could co-ordinate a date when the draft is complete.

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
📧 katie.dunmore@environment-agency.gov.uk

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From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Sent: 18 October 2022 09:11
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: Daneshill HPI comms to stakeholders

Morning,

Before it goes out we will need to know where the decision document is published on the GOV.UK website, I don't know where this will be sorry. Do you know this?

I will discuss with our Comms and Engagement team once the Draft is complete and let you know when we are ready.

Rhidian

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 12 October 2022 15:33
To: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Subject: RE: Daneshill HPI comms to stakeholders

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Katie Dunmore
Permitting Officer
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✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
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<http://www.smartsurvey.co.uk/s/NPScustomer/>



From: Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>
Sent: 30 September 2022 09:16
To: Bischer, Mel <melanie.bischer@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: Daneshill HPI comms to stakeholders

Good morning Katie and Mel,

Please see the draft version of the correspondence we intend to send out to stakeholder regarding the permit variation at Danes Hill landfill site (EPR-NP3538MF).

If you have any comments please let me know.

Kind regards,

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

Grange, Adam

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

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✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
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8 katie.dunmore@environment-agency.gov.uk

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Sent: 30 September 2022 09:16
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If you have any comments please let me know.

Kind regards,

Rhidian Jones PER
Regulated Industries Officer,
Trentside,
Scarrington Road,
West Bridgford.
NG2 5FA
02084749280
07468 369970

Grange, Adam

From: Raynes, Graham
Sent: 11 November 2021 11:30
To: Hall, Chris; Murray, John; Dunmore, Katie
Cc: Hadley, Richard
Subject: RE: Asbestos soil treatment best practice guide

I think Duntons have enclosed storage and enclosed treatment (covered/enclosed picking line) but I've not seen that site.

G

From: Hall, Chris
Sent: 11 November 2021 11:27
To: Murray, John <john.murray@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Hadley, Richard <richard.hadley@environment-agency.gov.uk>
Subject: RE: Asbestos soil treatment best practice guide

I don't know of any others.

From: Murray, John
Sent: 11 November 2021 11:25
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Hadley, Richard <richard.hadley@environment-agency.gov.uk>
Subject: RE: Asbestos soil treatment best practice guide

Thanks Chris

Interesting that they do it outside.. At least with the Tetron site its all done inside a building.

Apart from Duntons (Treatment in dedicated enclosed and abated picking cabin – what ever this is ??) do we have any sites where asbestos screening done outside without enclosure.

Regards

From: Hall, Chris
Sent: 10 November 2021 14:59
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Hadley, Richard <richard.hadley@environment-agency.gov.uk>; Murray, John <john.murray@environment-agency.gov.uk>
Subject: RE: Asbestos soil treatment best practice guide

Katie

At the very least the screener will need to be enclosed. See my discussions with Clive Wall about his permit.

All the treatment at Edwin Richards is inside. It appears that each permit application is a new step to trying out something mostly the same but a bit different – hence outside treatment. The operator has no experience of screening and fibre release so they only have experience of hand picking which should also be in a building. Don't be

afraid of refusing if the goal posts have moved yet again. Check to see if they are asking for picking of asbestos off the floor – at least one operator wanted to do this but we stopped them.

I don't think we can refuse simply because they don't have a landfill onsite to take the waste – we permit standalone operators with no landfill for asbestos picking – Dunton's for example. Dunton handpick outside by the looks of it but "in a dedicated enclosed and abated picking cabin."

Chris

From: Dunmore, Katie
Sent: 10 November 2021 14:41
To: Hall, Chris <chris.hall@environment-agency.gov.uk>
Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: RE: Asbestos soil treatment best practice guide

Thanks Chris,

This is the document I was after.

Daneshill is proving quite tricky to permit. Asbestos operations seem disordered. There is no dedicated location for the asbestos activities with storage, screening and picking to be located across all treatment areas including pads marked for bioremediation. I will drill down into the operators reception and segregation procedure but this approach just don't seem like a good idea. Hence why I was looking for the guide.

The operation relies on reception sampling for fibres present in the soil. There's abatement in terms of water suppression but this ultimately wont capture fibres if released by loading shovels, dropping and agitation of the cement. I'm concerned fibres could persist at the site. If problems did occur I don't see how these would be picked up. This is an outdoor operation with a couple of monitoring locations, one at the screener and one outside the picking booth. Operatives will not wear personal pumps. The operator has provided monitoring data taken from Edwin Richards quarry which they state evidences fibre emissions have never been detected above 0.0005f/ml. This doesn't remove the risk here though. In addition we've received some well-considered public comments along these lines. Some more technical ones I'm struggling to counter.

I've discussed this with my team and the general thought is that asbestos activities should be refused. This seems tricky considering the activities you mention and that the operators activities at Edwin Richards.

On a separate note, Daneshill doesn't have a stable non-reactive cell. Remediated soils will be use in restoration but asbestos pieces will be transported for disposal to another site approximately 40 miles away. I'm awaiting detail as to how its transported. Is triple handling itself an issue? Previously I've seen disposal at the treatment site too.

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
8 katie.dunmore@environment-agency.gov.uk

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From: Hall, Chris
Sent: 10 November 2021 09:26

To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: FW: Asbestos soil treatment best practice guide

Katie

You may be referring to the attached. I started a specific guidance note for soil treatment and appropriate measures but I have been involved in permit review and that work is my only real focus at the moment so the specific guide will have to wait. Since we first started looking at soil remediation where the soil was impacted with asbestos fragments the situation has become more complicated. We have a site permitted for screening of asbestos albeit we are in dispute with them over the enclosing of the operation for dust and asbestos fibre emissions abatement and we have a site that wants to wash soils impacted with asbestos fragments – this permit is still being written but we are adding in a clause “The washing of asbestos impacted wastes shall not increase the asbestos fibre load in the waste” because we have concerns that the washing process designed to fractionate the soil into heavy, medium and fine fractions will put asbestos fibres from the cement into the soil/stones matrix..

Our latest ideas regarding dual coding is to make the dual coding one entry in the permit for example:


| 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*and 17 06 05* | 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 05 04 and 17 06 05* | 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)) |

This clearly shows that the one waste has to be dual coded.

This is still an evolving process but I do not have time at the moment to devote to it.

If you have a particular site permit in mind, for example you were dealing with the Daneshill Landfill site, then Graham Raynes and I can talk you through it..

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

 **02030 251169**
 I work Monday to Thursday

From: Dunmore, Katie
Sent: 09 November 2021 16:34

To: Hall, Chris <chris.hall@environment-agency.gov.uk>

Subject: Asbestos soil treatment best practice guide

Hi Chris,

A couple of years ago you forwarded me a couple of documents on asbestos transfer and treatment. One was the storage and transfer quick guide available on the Intranet another was a short document relating to best practice focused on soil treatment sites – informal BAT. I can't find this second document, It may not have been published. If you can think of the one I mean do you have a copy?

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

☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*

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Grange, Adam

From: Dunmore, Katie
Sent: 16 May 2022 16:12
To: Raynes, Graham
Subject: Biofilter monitoring at Daneshill Landfill

Graham,

I've revised the FCC soil treatment facility permit with your comments, many thanks for these. I'd just like to check I'm on the right track with the biofilter monitoring which I think may be subject to scrutiny.

I've included TVOC and speciated VOC as you suggest from the healthcare template. Why do we use the healthcare template? I see the limit is the same as that detailed for physicochemical treatment of waste with calorific value.. Is it adapted from that?

I've also include NH3 with the limit 20mg/m3. Odour is also mentioned but do we not include as adding NH3. H2S is also detailed as a requirement however is this unlikely to arise from the bioremediation process?

| | | | | | | |
|---|---|---------------|----------------------|---|----------------|--------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | 30 mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 |
| | NH ₃ | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |
| | Dust | | 5mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |

Kind regards

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

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Grange, Adam

From: Dunmore, Katie
Sent: 24 February 2022 14:56
To: Raynes, Graham
Subject: Daneshill Landfill. Asbestos soil screening and BAT 14
Attachments: Daneshill BAT 14.pdf

Hi Graham,

FCC have provided further justification for their proposed asbestos soil screening and hand picking operations at the above site. I had previously confirmed with the operator these activities would be refused given we did not consider the proposal met BAT 14, in particular containment, collection and treatment of diffuse emissions.

FCC's have made an additional submission in support of their application which I have attached. I have the following questions and comments as to whether the submission provides appropriate assurance and I'd appreciate your advice as to whether we should stick with a refusal of this activity.

To summarise all storage and treatment activities are still proposed to be undertaken outside with the picking operation undertaken in a mobile above ground picking station with plastic weather covering like structure. The screener and conveyers leading to it are now enclosed with HEPA filtration as described in the document. Boundary monitoring and has been tightened up. The operator now proposes to monitor outside the picking station. I'm still however unsure if this monitoring is reliable or possible down to the detection limits FCC describe.

Monitoring. FCC confirm monitoring results will be available within 1hr of sampling. Mitigation undertaken if fibres detected above 0.001f/ml. Is this possible in an external environment?

Boundary monitoring has a detection limit of 0.0005f/ml again is this something we could rely on outside?

The monitoring plan referenced shows a couple of monitoring location on each treatment pad. This will need further clarification as previously FCC confirmed asbestos operations would be mobile from one pad to another with no dedicated location. This document now confirms asbestos storage and processing will be on a dedicated pad.

Picking station and screener

Is the proposed screener in line with the proposal at Rowley Regis?

The screener is now enclosed with monitored HEPA filter. Hopefully diffuse emissions from the activity could be avoided. My concern however is that asbestos pieces will be broken by the agitation. The output soils will then be discharged into the picking station.

As previously detailed this is a mobile unit with windows and flimsy cover. I would consider without screening this could be OK based on the fibre content of the soils at Waste Acceptance. Now however I'm concerned these soils will have a higher fibre load due to passing through the screener.

The input and output conveyors are uncovered with water suppression provided by spray rail – don't think this is enough.

My thoughts

Based on the WAP limits for fibres within the soil we could potentially permit the hand picking activity. Without the agitation of screening the methods proposed seem robust enough to prevent asbestos pieces breaking and fibre emissions unlikely.

For the reasons stated above I think the screening still doesn't meet BAT because it will increase the fibre load of the soil which would then be released by use of open conveyors, handpicking, dropping into storage piles.

Any thoughts you have would be gratefully received and how this might fit into the use of the screen at Rowley Regis.

Kind regards

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

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

mob: 07584 369561

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

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Grange, Adam

From: Dunmore, Katie
Sent: 05 September 2022 15:43
To: Raynes, Graham
Subject: Daneshill permit
Attachments: LIT 12001 - Notice of variation and consolidation single permit.docm

Graham,

Document as discussed.

Kind regards

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

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH
mob: 07584 369561
📧 katie.dunmore@environment-agency.gov.uk

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Grange, Adam

From: Dunmore, Katie
Sent: 14 April 2022 15:55
To: Raynes, Graham
Subject: FCC. Daneshill Landfill proposed STF EPR/NP3538MF/V009
Attachments: LIT 11951 - Decision document variation.docm; LIT 12001 - Notice of variation and consolidation single permit.docm

Hi Graham,

As discussed. FCC docs attached.

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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Grange, Adam

From: Hall, Chris
Sent: 10 November 2021 09:26
To: Dunmore, Katie
Cc: Raynes, Graham
Subject: FW: Asbestos soil treatment best practice guide
Attachments: SOIL TREATMENT options v 2.9 fixed plant requirements.docx; WRG Warley HP3632RP consolidated permit 02-06-21.docm

Katie

You may be referring to the attached. I started a specific guidance note for soil treatment and appropriate measures but I have been involved in permit review and that work is my only real focus at the moment so the specific guide will have to wait. Since we first started looking at soil remediation where the soil was impacted with asbestos fragments the situation has become more complicated. We have a site permitted for screening of asbestos albeit we are in dispute with them over the enclosing of the operation for dust and asbestos fibre emissions abatement and we have a site that wants to wash soils impacted with asbestos fragments – this permit is still being written but we are adding in a clause “The washing of asbestos impacted wastes shall not increase the asbestos fibre load in the waste” because we have concerns that the washing process designed to fractionate the soil into heavy, medium and fine fractions will put asbestos fibres from the cement into the soil/stones matrix..

Our latest ideas regarding dual coding is to make the dual coding one entry in the permit for example:

| 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*and 17 06 05* | 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 05 04 and 17 06 05* | 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)) |

This clearly shows that the one waste has to be dual coded.

This is still an evolving process but I do not have time at the moment to devote to it.

If you have a particular site permit in mind, for example you were dealing with the Daneshill Landfill site, then Graham Raynes and I can talk you through it..

Dr Chris Hall
Senior Advisor
Environment Agency

Environment & Business

☎ 02030 251169

I work Monday to Thursday

From: Dunmore, Katie

Sent: 09 November 2021 16:34

To: Hall, Chris <chris.hall@environment-agency.gov.uk>

Subject: Asbestos soil treatment best practice guide

Hi Chris,

A couple of years ago you forwarded me a couple of documents on asbestos transfer and treatment. One was the storage and transfer quick guide available on the Intranet another was a short document relating to best practice focused on soil treatment sites – informal BAT. I can't find this second document, It may not have been published. If you can think of the one I mean do you have a copy?

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

☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*

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Grange, Adam

From: Raynes, Graham
Sent: 24 February 2022 18:45
To: Hall, Chris; Dunmore, Katie
Subject: FW: Daneshill Landfill. Asbestos soil screening and BAT 14
Attachments: Daneshill BAT 14.pdf

Chris,

FCC appear have provided Katie further justification at Daneshill – in particular:

Storage will be on the open pads but covered with sheeting between delivery and treatment.

For the proposed pre-screener they are covering and abating via a HEPA filter. Is this a development from the Rowley Regis pre-app? Has anything been agreed there?

They are also challenging why we are requiring such tight control and refer to a 'Nicole' Report (I'm not familiar with it – are you?) asking what is our evidence for fibre release.

Conveyors from screen to picking station are appear covered though Katie says uncovered – not sure. Covered would be BAT I would say – given they're in the open. The waste is damped on the way into the picking stations so would appear to not be before that stage.

Picking station itself appears OK – same design as they already use.

See also notes below in red.

What do you think?

Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B

Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

External: **020302 50600**

Internal: **30600**

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Creating a better place
for people and wildlife



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

Sent: 24 February 2022 14:56

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: Daneshill Landfill. Asbestos soil screening and BAT 14

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Monitoring. FCC confirm monitoring results will be available within 1hr of sampling. Mitigation undertaken if fibres detected above 0.001f/ml. Is this possible in an external environment? **Depends – not going to catch the asbestos as after the fact – would only be evidence of some other problem likely fibrous asbestos has slipped through. What is the mitigation proposed? Asbestos fibre limit of detection = 0.001 fibres/ml according to the ambient monitoring method we specify, so must be achievable. They're basically saying if they detect anything they'll apply (unspecified) mitigation.**

Boundary monitoring has a detection limit of 0.0005f/ml again is this something we could rely on outside? **Not sure – seems low. Maybe better techniques used now? Chris are you aware of lower LOD methods?**

The monitoring plan referenced shows a couple of monitoring location on each treatment pad. This will need further clarification as previously FCC confirmed asbestos operations would be mobile from one pad to another with no dedicated location. This document now confirms asbestos storage and processing will be on a dedicated pad. **Monitoring has to be flexible as it is dependant on the wind direction. Upwind sampling is needed to establish without doubt the source. They possibly need to specify several of locations around the process, but not necessarily monitor all of them on a particular run. Minimum they should cover the directions of sensitive receptors – I can't remember if there were any close here.**

Picking station and screener

Is the proposed screener in line with the proposal at Rowley Regis? **Chris – as above**

The screener is now enclosed with monitored HEPA filter. Hopefully diffuse emissions from the activity could be avoided. My concern however is that asbestos pieces will be broken by the agitation. The output soils will then be discharged into the picking station. **They will be within the abated screener, so free fibres produced should be abated. Some abrasion is likely in any handling. Also we have permitted this at Rowley as long as it is enclosed and abated, so I don't think we can backtrack here for this.**

As previously detailed this is a mobile unit with windows and flimsy cover. I would consider without screening this could be OK based on the fibre content of the soils at Waste Acceptance. Now however I'm concerned these soils will have a higher fibre load due to passing through the screener. **Again – we have accepted this arrangement in principle at Rowley – they say this is the same design.**

The input and output conveyors are uncovered with water suppression provided by spray rail – don't think this is enough. **Input covered prior to spray rail seems BAT to me. Outward too? Chris?**

My thoughts

Based on the WAP limits for fibres within the soil we could potentially permit the hand picking activity. Without the agitation of screening the methods proposed seem robust enough to prevent asbestos pieces breaking and fibre emissions unlikely.

For the reasons stated above I think the screening still doesn't meet BAT because it will increase the fibre load of the soil which would then be released by use of open conveyors, handpicking, dropping into storage piles. **As per above we've accepted it at Rowley provided it is adequately enclosed and abated – can we go back on it now?**

Any thoughts you have would be gratefully received and how this might fit into the use of the screen at Rowley Regis.

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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Grange, Adam

From: Raynes, Graham
Sent: 05 September 2022 13:24
To: Barker, Paul (paul.e.barker@environment-agency.gov.uk)
Subject: FW: Soil treatment query - permit variation
Attachments: RE: Biofilter monitoring at Daneshill Landfill

Hi Paul,

Apologies – I should've got this to you last week.

Happy to chat through.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 01 September 2022 11:55
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: RE: Soil treatment query - permit variation

Agreed let's keep everything consistent – soil treatment is a special case of “biological treatment” so we need to monitor for TVOC but not have BAT-AELs. Monitoring required but no BAT-AEL. Treatment process is “biological treatment” so we need the odour stuff in there.

I am a bit confused - if the amount of hydrocarbon is 500 mg/kg how is it hazardous? If it is hazardous by other substances how is it recovered?

The permit allowing recovery of soils should be a 5.3 Part A(1)(a)(vi) with R5 not an R3 under 5.3 Part A(1)(a)(i). Can this be amended?

Are you happy with those from the biowaste permit you showed me? Yes.

Or is the fact they are potentially changing the emission trigger the review of that against BATCs? Yes.

Should we have a chat?

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 30 August 2022 15:54
To: Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: FW: Soil treatment query - permit variation

Hi Chris,

As discussed this is Paul's 5.3 biotreatment activity (on Rainham Landfill permit EPR/NP3538MF)  [Application Variation - Notice Issued - 13052022.pdf](#)

From our discussion (and going back to Daneshill discussion with Katie – see attached), I think we came to the conclusion that a BAT-AEL for TVOC is not needed, but if any other substances (e.g. benzene) are emitted as

significant via H1 an appropriate substance-specific limit may be needed. Shall we use the conclusions of the Daneshill email as the suite or does it need looking at?

With regard to Paul’s second suggestion – I think the standard biofilter requirements should go in – which he is proposing to take from the biowaste review permits. Are you happy with those from the biowaste permit you showed me?

On a general point – the Landfill site doesn’t appear to have had a R61 covering the soil treatment activity, so what is the position for implementing the BATCs? Previously I believe we’ve taken the line that subsidiary activities on a large installation are reviewed on the cycle of the main activity (i.e so here the soil treatment plant should be done against BATCs when the Landfill is next reviewed?) Or is the fact they are potentially changing the emission trigger the review of that against BATCs?

Thanks
Graham

From: Barker, Paul <paul.e.barker@environment-agency.gov.uk>
Sent: 22 August 2022 15:15
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: Soil treatment query - permit variation

Hi Graham

I have a waste soil treatment query I'd like your opinion on please. Its for a normal variation at Veolia site at Rainham landfill where they treat oil contaminated soils by adding 5% compost and then treat them in biopile under negative pressure with a biofilter for 4-16 weeks to bring down the oil content for use as a restoration soil either on site or export off site. I have assumed this is a standard technique for this haz waste stream as has been permitted under a pervious variation.

The variation is purely to increase the max PAH content in the soils they accept from 200 to 500mg/kg. No other parameters are changing

They have a emission point in the current permit without any limits

| Table S3.10 Point source emissions to air – emission limits and monitoring requirements | | | | | | |
|---|---------------|------------------|-----------------------------------|-------------------------|-----------------------------|--------------------------------------|
| Emission point ref. & location | Source | Parameter | Limit (including unit) (1) | Reference period | Monitoring frequency | Monitoring standard or method |
| At the biofilter exhaust | Biofilter | VOC | No limit set | Spot | Daily | Photoionization detector (PID) |
| | | Odour | No limit set | | | Olfactory monitoring |
| (1) Limits to be reviewed following the completion of the actions required under IC11 and IC12 in Table S1.3. | | | | | | |

The operator has previously submitted review of VOC and odour from the site under ICs 11 and 12 which were signed off previously in 2017

The emissions from the biofilter were pretty small

Table 4.3 Modelled main biofilter emission rates

| Pollutant | Emission rate (g s ⁻¹) |
|---|------------------------------------|
| Methane | 0.027 |
| Volatile organic compounds (VOC) as benzene | 0.0014 |

And

| Sample source | Geometric mean odour concentration, ou _E /m ³ | odour emission rate from surfaces, ou _E m ⁻² s ⁻¹ | Odour emission from each source ou _E /s |
|------------------|---|--|--|
| Treated Pile | 38 | 0.29 | 951* |
| Untreated pile | 2335 | 15.46 | 3301* |
| Biofilter inlet | 61 | | 51** |
| Biofilter outlet | 16 | | 13** |

*Piles assumed to be 27m x 8m x 3m high. Actual surface area will be greater due to uneven surfaces.

**Biofilter emission rate based on 300m³/hr inlet airflow provided by Geo2.

4.1.3 Impact of the biofilter emission

Based on the measured odour concentration on 14 January and the calculated outlet of the biofilter of 13 ou_E/s and the additional dilution effect of dispersion would be detected at the boundary of the site 30m (distance specified by Veol from the biofilter).

I just wanted to know whether we should be including the BAT AEL for VOC in the permit as we have been under the composting permit review. For these site we have adopted the upper limit of 40 mg/Nm³ TVOC – monitored 6 monthly. There is also a condition requiring the maintenance of the biofilter, which I could also insert.

Just wanted to be consistent. Is this overkill and am I gold plating and not required, or do you think we should be inserting these conditions from the biowaste review, or are you happy the risk is low and will be picked up in future as part of a separate review of landfill and soil treatment activities?

Happy for you to call me back if easier to explain/discuss and provide guidance

Many thanks

Paul

Paul Barker MSc, BSc (Hons), MCIWM

Senior Permitting Officer (Installations)

National Permitting Service

Environment Agency: Manley House, Kestrel Way, Exeter, Devon, EX2 7LQ

paul.e.barker@environment-agency.gov.uk

External: 02030 252411 | Mobile: 07721 390138

Grange, Adam

From: Hall, Chris
Sent: 08 October 2021 15:51
To: Raynes, Graham
Subject: Re: Asbestos soil screening and hand picking st Daneshill Landfill site

We can do that but we have not agreed yet with how they fulfil it. My preference was not to permit it at all but Richard H countermanded me. This saga is part of why I want to retire as soon as possible.

Sent from my iPhone

On 8 Oct 2021, at 15:48, Raynes, Graham <graham.raynes@environment-agency.gov.uk> wrote:

Hi Chris,
We can't really do anything else but give them the same pre-op as Rowley can we? We would be hard pressed to refuse given we did that there.
G

From: Hall, Chris
Sent: 08 October 2021 13:54
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Hadley, Richard <richard.hadley@environment-agency.gov.uk>; Wall, Clive <clive.wall@environment-agency.gov.uk>; Murray, John <john.murray@environment-agency.gov.uk>
Subject: Re: Asbestos soil screening and hand picking st Daneshill Landfill site

Katie

I know no more than Richard. I don't know if Clive does? What scares we is the amount of asbestos impacted soils.

Speak to John Murray about how we are including the dual coding in a permit for washing asbestos impacted soil. The new way is clearer.

Chris

Sent from my iPhone

On 8 Oct 2021, at 13:21, Dunmore, Katie <katie.dunmore@environment-agency.gov.uk> wrote:

Hi Chris,

I'm assessing a STF application for FCC Recycling at the above site. Along with bioremediation they want to carry out screening and handpicking of asbestos contaminated soils.

I've just received further information via Schedule 5 but I still consider the asbestos activities to be unsuitable. All activities are carried out in the open including the use of an unabated 3 way screener. Soil stockpiles move on open conveyors into a portacabin type picking station. There are plenty of drops with no specific "gentle" handling techniques. Stockpiles formed with loading shovels etc. The only means of emissions abatement is water and surfactant sprays.

FCC's response leans heavily on emissions monitoring carried out at Rowley Regis which states that dust sampling without suppression shows results below 0.0005f/ml or 0.01f/ml. Their response can be summarise to - they don't need mitigation such as enclosed buildings/equipment or specific handling techniques because fibres will not be present as evidenced by the monitoring appended to their response.

I don't quite how to take this response as I had extensive discussions with their consultant when the schedule 5 was issued. I stated that we had significant concerns (screening aside) about dropping from height, agitation from conveyors etc and the potential to break asbestos cement. Where would we stand with this if they consider they are providing evidence operations do not lead to fibre release?

Similarly they had dropped the amount of monitoring hear compared to other sites. There's no personal operative monitoring proposed with only two fibre monitoring points in the vicinity of the screen and picking station. Given this is outside and open to all weathers could this ever give reliable results?

I have spoken to Richard briefly regarding the screener pre-op at Rowley Regis. FCC won't provide any further information to me on my screener until discussions have concluded with the Rowley Regis pre-op. I understood it had been left that we weren't discussing it, that they needed to comply or they can't have it. Have there been further developments with this?

I had initially said I would refuse the screener on my site on my site if they didn't respond to the Schedule 5 but FCC seem very set that we are about to agree something at Rowley Regis. Any info would therefore be greatly received.

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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from height, agitation from conveyors etc and the potential to break asbestos cement. Where would we stand with this if they consider they are providing evidence operations do not lead to fibre release?

Similarly they had dropped the amount of monitoring here compared to other sites. There's no personal operative monitoring proposed with only two fibre monitoring points in the vicinity of the screen and picking station. Given this is outside and open to all weathers could this ever give reliable results?

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

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

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Grange, Adam

From: Raynes, Graham
Sent: 08 October 2021 15:58
To: Hall, Chris
Subject: RE: Asbestos soil screening and hand picking st Daneshill Landfill site

Fair point

Talk to you next week.

G

From: Hall, Chris
Sent: 08 October 2021 15:51
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: Re: Asbestos soil screening and hand picking st Daneshill Landfill site

We can do that but we have not agreed yet with how they fulfil it. My preference was not to permit it at all but Richard H countermanded me. This saga is part of why I want to retire as soon as possible.

Sent from my iPhone

On 8 Oct 2021, at 15:48, Raynes, Graham <graham.raynes@environment-agency.gov.uk> wrote:

Hi Chris,

We can't really do anything else but give them the same pre-op as Rowley can we? We would be hard pressed to refuse given we did that there.

G

From: Hall, Chris
Sent: 08 October 2021 13:54
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Hadley, Richard <richard.hadley@environment-agency.gov.uk>; Wall, Clive <clive.wall@environment-agency.gov.uk>; Murray, John <john.murray@environment-agency.gov.uk>
Subject: Re: Asbestos soil screening and hand picking st Daneshill Landfill site

Katie

I know no more than Richard. I don't know if Clive does? What scares we is the amount of asbestos impacted soils.

Speak to John Murray about how we are including the dual coding in a permit for washing asbestos impacted soil. The new way is clearer.

Chris

Sent from my iPhone

On 8 Oct 2021, at 13:21, Dunmore, Katie <katie.dunmore@environment-agency.gov.uk> wrote:

Hi Chris,

I'm assessing a STF application for FCC Recycling at the above site. Along with bioremediation they want to carry out screening and handpicking of asbestos contaminated soils.

I've just received further information via Schedule 5 but I still consider the asbestos activities to be unsuitable. All activities are carried out in the open including the use of an unabated 3 way screener. Soil stockpiles move on open conveyors into a portacabin type picking station. There are plenty of drops with no specific "gentle" handling techniques. Stockpiles formed with loading shovels etc. The only means of emissions abatement is water and surfactant sprays.

FCC's response leans heavily on emissions monitoring carried out at Rowley Regis which states that dust sampling without suppression shows results below 0.0005f/ml or 0.01f/ml. Their response can be summarise to - they don't need mitigation such as enclosed buildings/equipment or specific handling techniques because fibres will not be present as evidenced by the monitoring appended to their response.

I don't quite how to take this response as I had extensive discussions with their consultant when the schedule 5 was issued. I stated that we had significant concerns (screening aside) about dropping from height, agitation from conveyors etc and the potential to break asbestos cement. Where would we stand with this if they consider they are providing evidence operations do not lead to fibre release?

Similarly they had dropped the amount of monitoring hear compared to other sites. There's no personal operative monitoring proposed with only two fibre monitoring points in the vicinity of the screen and picking station. Given this is outside and open to all weathers could this ever give reliable results?


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Grange, Adam

From: Raynes, Graham
Sent: 12 November 2021 09:14
To: Dunmore, Katie
Subject: RE: Asbestos soil treatment best practice guide

Super – talk to you next week. What's the app number? I'll have a read of their main docs.

From: Dunmore, Katie
Sent: 11 November 2021 17:47
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: RE: Asbestos soil treatment best practice guide

Hi Graham,

Yes, that would be useful. I'll put something in the diary for next week.

Kind regards

Katie Dunmore
Permitting Officer
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Graham

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Sent: 11 November 2021 11:30
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Apart from Duntons (Treatment in dedicated enclosed and abated picking cabin – what ever this is ??) do we have any sites where asbestos screening done outside without enclosure.

Regards

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To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Hadley, Richard <richard.hadley@environment-agency.gov.uk>; Murray, John <john.murray@environment-agency.gov.uk>
Subject: RE: Asbestos soil treatment best practice guide

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I've discussed this with my team and the general thought is that asbestos activities should be refused. This seems tricky considering the activities you mention and that the operators activities at Edwin Richards.

On a separate note, Daneshill doesn't have a stable non-reactive cell. Remediated soils will be use in restoration but asbestos pieces will be transported for disposal to another site approximately 40 miles away. I'm awaiting detail as to how its transported. Is triple handling itself an issue? Previously I've seen disposal at the treatment site too.

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

From: Hall, Chris
Sent: 18 May 2022 08:50
To: Raynes, Graham; Dunmore, Katie
Cc: Chesney, Pete
Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham, Katie

I agree that talking with Abraham would be helpful.

My thoughts:

We should base monitoring on the likely emissions from the process.

We should base the limits on the BAT-AETs first which will be mandatory. Then for the other emissions we should base the limit on whether it is necessary to control the emission. The H1 might be the mechanism to do this.

Thus for biological treatment of soils* (not really thought of it as a mechanical biological treatment as it is not put into a mechanical device that turns it or pressurises it – the forced air flow is more related to the abatement than the treatment), they need to monitor for **odour** but they can alternatively monitor for **H₂S** and **NH₃**.

If the contaminant in the waste is oil or other organics then monitoring for TVOC and speciated should be done – there is no mandatory AEL so we could set a limit based on the H1 (either based on real data or on data collected via an improvement condition to do the H1) which could even determine that there is no need for a limit?

We are always going to suspect that particulate matter (dust) could be an issue but again no mandatory BAT-AEL. Where a limit is given it is usually 5 mg/m³ so we could simply go with that as a starting point. Otherwise do we go with the H1 (either based on real data or on data collected via an improvement condition to do the H1)?

So:

| | | | | | | |
|---|---|------------------|--|--|-------------------|----------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | Limit contrived from H1 immediate OR Limit contrived from H1 done from improvement condition OR No limit set?? | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
|---|---|------------------|--|--|-------------------|----------------|

| | | | | | | |
|--|---------------------------|--|---|---|----------------|--------------|
| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 |
| | Odour | | 1000 ouE/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | EN 13725 |
| | Particulate Matter (Dust) | | 5mg/m ³ OR Limit contrived from H1 immediate OR Limit contrived from H1 done from improvement condition OR No limit set?? | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | EN 13284-1 |

* All biological treatment processes for hazardous waste must be actively controlled for emissions – there should be no passive venting of emissions.

What do you think?

I probably need to accelerate the outlines for each of the treatment processes given in the BAT conclusions but there are issues with each of them which are confounding matters.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169
 I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 17 May 2022 11:47
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Hi Katie,

Yes the Healthcare permit review was done first so the permit is in the correct format for the BATCs. Total and speciated VOCs are the 2 test methods mentioned in our MCERTS guidance so better than specifying BTEX or something like that.

NH3 is an analogue for odour – this process shouldn't be too odorous as there are primarily traces of oil in soil rather than a fully biodegradable process like composting.

Chris is working on the Chem waste template so I've copied him in – Chris have you given any thought yet to soil treatment? Looking at the process – should limits be based on those given in Table 6.7 for biological treatment of waste for this type of process? I would expect it fits into mechanical biological as it has forced air flow under suction? Has a slightly higher TVOC (40mg/m3) than phys-chem. Could do with your thoughts on how NH3, Odour and H2S fit into the picture. Maybe go with NH3 limit alone?

I think it would be worth sharing with Abraham for a biowaste view on limits and process monitoring for biofilters too.

Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

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Internal: **30600**

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

Sent: 16 May 2022 16:12

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: Biofilter monitoring at Daneshill Landfill

Graham,

I've revised the FCC soil treatment facility permit with your comments, many thanks for these. I'd just like to check I'm on the right track with the biofilter monitoring which I think may be subject to scrutiny.

I've included TVOC and speciated VOC as you suggest from the healthcare template. Why do we use the healthcare template? I see the limit is the same as that detailed for physicochemical treatment of waste with calorific value.. Is it adapted from that?

I've also include NH3 with the limit 20mg/m3. Odour is also mentioned but do we not include as adding NH3. H2S is also detailed as a requirement however is this unlikely to arise from the bioremediation process?

| | | | | | | |
|---|---|---------------|----------------------|---|----------------|--------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | 30 mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 |
| | NH ₃ | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |
| | Dust | | 5mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |

Kind regards

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

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Grange, Adam

From: Raynes, Graham
Sent: 10 November 2021 15:45
To: Hall, Chris; Dunmore, Katie
Cc: Hadley, Richard; Murray, John
Subject: RE: Asbestos soil treatment best practice guide
Attachments: Asbestos Sites.xlsx

Hi Katie,

Do you want to have a chat to go through the permitting issues? Happy to help you with it.

It would be good to know exactly what they are doing – could you put a line in the attached spreadsheet? Trying to capture what is proposed because every operator tries something different.

Best Regards

Graham

From: Hall, Chris
Sent: 10 November 2021 14:59
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Hadley, Richard <richard.hadley@environment-agency.gov.uk>; Murray, John <john.murray@environment-agency.gov.uk>
Subject: RE: Asbestos soil treatment best practice guide

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To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: FW: Asbestos soil treatment best practice guide

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Environment & Business

 **02030 251169**

I work Monday to Thursday

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Grange, Adam

From: Dunmore, Katie
Sent: 10 November 2021 15:44
To: Hall, Chris
Cc: Raynes, Graham; Hadley, Richard; Murray, John
Subject: RE: Asbestos soil treatment best practice guide

Hi Chris,

The applicant is not responding to queries regarding the screener at present, stating they are waiting our decision on their monitoring data at Edwin Richards. I'm therefore just considering the asbestos picking. This will be undertaken within a raised booth with conveyer belt. It's a mobile unit with weather covering but there's no proposal for formal enclosure, mitigation of monitoring in the booth. All soils are stored outside uncovered.

The operator is handling and treating these soils as if it were a non-hazardous aggregate facility. Justification relies on the soil matrix being non-hazardous for asbestos and they don't acknowledge treatment could break asbestos cement. This is the reason we are considering refusal.

I've not had these discussions yet with the operator, we're a way off but as it stands I have no mitigation to put in a Decision Document to support issue.

Kind regards

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Sent: 10 November 2021 09:26
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: FW: Asbestos soil treatment best practice guide

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 **02030 251169**

I work Monday to Thursday

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Sent: 10 November 2021 14:59
To: Dunmore, Katie
Cc: Raynes, Graham; Hadley, Richard; Murray, John
Subject: RE: Asbestos soil treatment best practice guide
Attachments: RE: Soil Treatment Facility; HP3403BL Dunton permit 2021.docm

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Grange, Adam

From: Hall, Chris
Sent: 22 November 2021 13:40
To: Dunmore, Katie
Cc: Raynes, Graham
Subject: RE: Asbestos soil treatment best practice guide
Attachments: Soil treatment draft S1.6 November 2021.docx

Katie

I notice I got my cut and pasting wrong in the descriptions below they should read:

| 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* and 17 06 05* | 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 and 17 06 05* | 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)) |

I fixed the soil treatment permit outline draft as attached above. It needs more work but I have no time at the moment.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

 **02030 251169**

I work Monday to Thursday

From: Hall, Chris
Sent: 10 November 2021 09:26
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: FW: Asbestos soil treatment best practice guide

Katie

You may be referring to the attached. I started a specific guidance note for soil treatment and appropriate measures but I have been involved in permit review and that work is my only real focus at the moment so the specific guide will have to wait. Since we first started looking at soil remediation where the soil was impacted with asbestos fragments the situation has become more complicated. We have a site permitted for screening of asbestos albeit we are in dispute with them over the enclosing of the operation for dust and asbestos fibre emissions abatement and we have a site that wants to wash soils impacted with asbestos fragments – this permit is still being written but we are adding in a clause “The washing of asbestos impacted wastes shall not increase the asbestos fibre load in the waste” because we have concerns that the washing process designed to fractionate the soil into heavy, medium and fine fractions will put asbestos fibres from the cement into the soil/stones matrix..

Our latest ideas regarding dual coding is to make the dual coding one entry in the permit for example:


| Waste code | Description |
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| 17 | Construction and demolition wastes (including excavated soil from contaminated sites) |
| 17 05 | soil (including excavated soil from contaminated sites), stones and dredging spoil |
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| 17 05 04 and 17 06 05* | 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)) |

This clearly shows that the one waste has to be dual coded.

This is still an evolving process but I do not have time at the moment to devote to it.

If you have a particular site permit in mind, for example you were dealing with the Daneshill Landfill site, then Graham Raynes and I can talk you through it..

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

 **02030 251169**
 I work Monday to Thursday

From: Dunmore, Katie
Sent: 09 November 2021 16:34
To: Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: Asbestos soil treatment best practice guide

Hi Chris,

A couple of years ago you forwarded me a couple of documents on asbestos transfer and treatment. One was the storage and transfer quick guide available on the Intranet another was a short document relating to best practice focused on soil treatment sites – informal BAT. I can't find this second document, It may not have been published. If you can think of the one I mean do you have a copy?

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
☎ 02030 254435 (*internal 54435*) *mob: 07584 369561*
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Grange, Adam

From: Hall, Chris
Sent: 19 May 2022 09:25
To: Raynes, Graham; Dunmore, Katie
Cc: Chesney, Pete
Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham thanks again.

I find the whole thing quite maddening. I am confused that soil washing which is a wet process has a dust monitoring requirement but biological treatment of soil which is a dry process does not. It is also odd that the mandatory monitoring for soil treatment is odour or NH₃/H₂S when only one of our existing permits includes this.

It would be unfortunate that we had less control over emissions after the permit review than before. I would be loath to remove too much monitoring for those sites that already have it but it would be good to get consistency across every site doing soil treatment. Not sure it is worth monitoring for each of TVOC TPH, BTEX, PAHs and TVOC 15 but it is worth getting all sites to monitor for TVOC and speciated VOCs to give us some consistency across each site.

This is a suggestion for emission limits for biological soil treatment. Could be run past the monitoring/emissions experts.

| Emission point ref. & location | Source | Parameter | Limit (incl |
|---|---------------------------------|---|--|
| Description of the emission point including its abatement Example: Soil treatment biofilter as shown on the layout plan in Schedule 7 as A1. | Soil treatment filter biofilter | Odour (Note 1) | 1000 ouE |
| | | H ₂ S (Note 1) | No limit s |
| | | NH ₃ (Note 1) | 20 mg/m ³ |
| | | Total volatile organic compounds (TVOC) | No limit s |
| | | Speciated VOCs | Limit cont immediat OR Limit cont done from condition |

| | | | |
|--|--|---------------------------|------------|
| | | Particulate Matter (Dust) | No limit s |
|--|--|---------------------------|------------|

Note 1 The monitoring of NH₃ and H₂S can be used as an alternative to the monitoring of the odour concentration. [Do we le

* These standards are taken from biowaste treatment permit for Biogen [Biowaste Treatment Permit Review - Permit Issued](#)

Abatement combinations

- Adsorption
- Biofilter
- Fabric filter
- Thermal oxidation
- Wet scrubbing

Any help is welcomed – we need to bottom this out.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169

I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Sent: 18 May 2022 15:54

To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>

Subject: RE: Biofilter monitoring at Daneshill Landfill

Good spot – so this is definitely biological treatment but according to that table not MBT. It then refers to section 5.6 of the Bref, but that just leaves us up in the air as soil bioremediation isn't followed through into the BATCs – maybe they just gave up at that point?

So according to biological BATCs we should have for BAT-AELs:

NH₃ or odour

Plus any ELVs for other speciated contaminants in the inventory of emissions (e.g. Benzene if these are an issue (via usual H1 approach)).

And monitoring:

NH₃ or odour

H2S

Plus speciated VOC for any other ELV, subject to H1 etc.

No dust or TVOCs though with this though.

The only part of 5.6 (ignoring thermal desorption as it's so dissimilar) to get into the BATC is soil washing – perhaps use this as a guide too? That wouldn't include any more BAT-AELs, but would include Dust and TVOC monitoring under BAT8.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 18 May 2022 14:16
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Table 4.1 in the BRef says:

Table 4.1: Biological treatments of waste

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It specifically includes soil contaminated with oil (ex situ soil only).

We do end up with only the one effective mandatory BAT-AEL (H₂S/NH₃ or odour concentration). We can control the likely emissions from the process with emission limits - since we suspect dust and TVOC we monitor for them too and for dust shoehorn in a dust limit.

Looking at the existing permits we have some TVOC monitoring may not be a shock.

Note Dunton Technologies, Liverpool was given the monitoring as if it were MBT.

Dust is not universal in existing permits.

2 permits have no emissions monitoring at all.

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|-----------------------------------|---|---|------------------------------------|
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| | | | |
|-------------------------------------|--|-------------------------------|--|
| Brett Aggregates Limited | Hithermoor Recycling And Recovery Facility - EPR/AB3006CE | Biological treatment of waste | Bioremediation of hazardous waste recovery (S5.3) Bioremediation of non-hazardous waste and recovery (S5.4) |
| Dunton Environmental Limited | Horseley Field Waste Treatment Facility EPR/BP3331DD | Biological treatment of waste | Ex-situ treatment of waste |
| Dunton Technologies Limited | Ellesmere Port Waste Treatment Facility | Biological treatment of waste | Biological treatment of waste (enclosed biopiles, forced aeration) |
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| Keltbray AWS Limited | Mohawk Wharf Recycling Facility EPR/FP3092LH | Biological treatment of waste | Bioremediation of hazardous waste Bioremediation of non-hazardous waste (not allowed too). |
| Mick George Ltd | Woodhatch Farm WTS EPR/EP3038VB | Biological treatment of waste | Biological treatment of waste and low VOC contamination Biological treatment of waste and low VOC contamination |
| Waste Recycling group (Central) Ltd | ERQ - STC, EPR/HP3632RP/V002 | Biological treatment of waste | Bioremediation process Bioremediation process Bioremediation process disposal. Bioremediation process recovery. |

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169
I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 18 May 2022 12:12
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

I would say it falls more biological than physchem, if we are saying the treatment is bugs biodegrading the organic contaminants. There is no chemical reactions to speak of. For physical treatment – turning/incorporation of organics, (+volatilisation?)

If we classify it as mechanical biological treatment we get ELVs for:

BAT-associated emission levels (BAT-AELs) for channelled NH₃, odour, dust and TVOC emissions to air from the biological treatment of waste

| Parameter | Unit | BAT-AEL (Average over the sampling period) | Waste treatment process |
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| NH ₃ ⁽¹⁾ ⁽²⁾ | mg/Nm ³ | 0,3-20 | All biological treatments of waste |
| Odour concentration ⁽¹⁾ ⁽²⁾ | ou _E /Nm ³ | 200-1 000 | |
| Dust | mg/Nm ³ | 2-5 | Mechanical biological treatment of waste |
| TVOC | mg/Nm ³ | 5-40 ⁽³⁾ | |

⁽¹⁾ Either the BAT-AEL for NH₃ or the BAT-AEL for the odour concentration applies.
⁽²⁾ This BAT-AEL does not apply to the treatment of waste mainly composed of manure.
⁽³⁾ The lower end of the range can be achieved by using thermal oxidation.

Plus monitoring for the above (NH3 or odour) and H2S.

MBT is defined as:

| | |
|---------------------------------------|---|
| Mechanical biological treatment (MBT) | Treatment of mixed solid waste combining mechanical treatment with biological treatment such as aerobic or anaerobic treatment. |
|---------------------------------------|---|

Not looked at the Bref though not sure if this stretches the definition of MBT? To me it would seem a specialist sub category or it.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 18 May 2022 11:23
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham

The BAT conclusions are more tricky to negotiate than I would like.

If we say that biological treatment of soils is “Biological treatment of waste” then BAT is to monitor for H₂S/NH₃ or odour concentration in accordance with BAT 34 and Table 6.7.

We could say that this process is both “Biological treatment of waste” and “Physico-chemical treatment of solid and/or pasty waste” which would add in Dust but I think we can add in dust anyway.

We could say that this process is both “Biological treatment of waste” and “Physico-chemical treatment of waste with calorific value” and “Physico-chemical treatment of solid and/or pasty waste” which add in a mandatory 30 mg/m³ for TVOC.

I would like biological soil treaters to monitor for TVOC but we may not be able to set limits.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169

I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 18 May 2022 10:11
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Thanks Chris,

So we are saying there are no mandatory BAT-AELs for biological treatment of haz soils – bit confused. If mandatory TVOC limit would be needed?

I would be careful about setting limits for odour – the monitoring is expensive and we have previously only put limits in in exceptional cases. NH₃ may be simpler.

There is no way to put TVOC through H1 – would have to use a proxy like benzene as a worst case. We can set limits on individual substance if H1 shows an issue. I would have to look at the rationale behind how we set those as I’m not too familiar – usually we take our limits from the sector guidance/ Bref if needed, so not sure how we would set a particular limits without those.

OK with dust limit.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 18 May 2022 08:50
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham, Katie

I agree that talking with Abraham would be helpful.

My thoughts:

We should base monitoring on the likely emissions from the process.

We should base the limits on the BAT-AETs first which will be mandatory. Then for the other emissions we should base the limit on whether it is necessary to control the emission. The H1 might be the mechanism to do this.

Thus for biological treatment of soils* (not really thought of it as a mechanical biological treatment as it is not put into a mechanical device that turns it or pressurises it – the forced air flow is more related to the abatement than the treatment), they need to monitor for **odour** but they can alternatively monitor for **H₂S** and **NH₃**.

If the contaminant in the waste is oil or other organics then monitoring for TVOC and speciated should be done – there is no mandatory AEL so we could set a limit based on the H1 (either based on real data or on data collected via an improvement condition to do the H1) which could even determine that there is no need for a limit?

We are always going to suspect that particulate matter (dust) could be an issue but again no mandatory BAT-AEL. Where a limit is given it is usually 5 mg/m³ so we could simply go with that as a starting point. Otherwise do we go with the H1 (either based on real data or on data collected via an improvement condition to do the H1)?

So:

| | | | | | | |
|---|---|------------------|--|--|-------------------|----------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | Limit contrived from H1 immediate OR Limit contrived from H1 done from improvement condition OR No limit set?? | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | | |

| | | | | | | |
|--|---------------------------|--|---|---|----------------|------------|
| | Odour | | 1000 ouE/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | EN 13725 |
| | Particulate Matter (Dust) | | 5mg/m ³ OR Limit contrived from H1 immediate OR Limit contrived from H1 done from improvement condition OR No limit set?? | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | EN 13284-1 |

* All biological treatment processes for hazardous waste must be actively controlled for emissions – there should be no passive venting of emissions.

What do you think?

I probably need to accelerate the outlines for each of the treatment processes given in the BAT conclusions but there are issues with each of them which are confounding matters.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169
 I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 17 May 2022 11:47
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Hi Katie,

Yes the Healthcare permit review was done first so the permit is in the correct format for the BATCs. Total and speciated VOCs are the 2 test methods mentioned in our MCERTS guidance so better than specifying BTEX or something like that.

NH3 is an analogue for odour – this process shouldn't be too odorous as there are primarily traces of oil in soil rather than a fully biodegradable process like composting.

Chris is working on the Chem waste template so I've copied him in – Chris have you given any thought yet to soil treatment? Looking at the process – should limits be based on those given in Table 6.7 for biological treatment of waste for this type of process? I would expect it fits into mechanical biological as it has forced air flow under suction? Has a slightly higher TVOC (40mg/m3) than phys-chem. Could do with your thoughts on how NH3, Odour and H2S fit into the picture. Maybe go with NH3 limit alone?

I think it would be worth sharing with Abraham for a biowaste view on limits and process monitoring for biofilters too.

Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

External: **020302 50600**

Internal: **30600**

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

Sent: 16 May 2022 16:12

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: Biofilter monitoring at Daneshill Landfill

Graham,

I've revised the FCC soil treatment facility permit with your comments, many thanks for these. I'd just like to check I'm on the right track with the biofilter monitoring which I think may be subject to scrutiny.

I've included TVOC and speciated VOC as you suggest from the healthcare template. Why do we use the healthcare template? I see the limit is the same as that detailed for physicochemical treatment of waste with calorific value.. Is it adapted from that?

I've also include NH3 with the limit 20mg/m3. Odour is also mentioned but do we not include as adding NH3. H2S is also detailed as a requirement however is this unlikely to arise from the bioremediation process?

| | | | | | | |
|---|---|---------------|----------------------|---|----------------|--------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | 30 mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 |
| | NH ₃ | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |
| | Dust | | 5mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |

Kind regards

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

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

mob: 07584 369561

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

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Grange, Adam

From: Raynes, Graham
Sent: 18 May 2022 15:54
To: Hall, Chris; Dunmore, Katie
Cc: Chesney, Pete
Subject: RE: Biofilter monitoring at Daneshill Landfill

Good spot – so this is definitely biological treatment but according to that table not MBT. It then refers to section 5.6 of the Bref, but that just leaves us up in the air as soil bioremediation isn't followed through into the BATCs – maybe they just gave up at that point?

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NH3 or odour

Plus any ELVs for other speciated contaminants in the inventory of emissions (e.g. Benzene if these are an issue (via usual H1 approach)).

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| | | | |
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| TVOC | mg/Nm ³ | 5-40 ⁽³⁾ | |

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Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham

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Environment & Business

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Sent: 18 May 2022 10:11

To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

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Subject: RE: Biofilter monitoring at Daneshill Landfill

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I've also include NH3 with the limit 20mg/m3. Odour is also mentioned but do we not include as adding NH3. H2S is also detailed as a requirement however is this unlikely to arise from the bioremediation process?

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| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | 30 mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
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| | NH ₃ | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |
| | Dust | | 5mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |

Kind regards

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

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Grange, Adam

From: Hall, Chris
Sent: 18 May 2022 14:16
To: Raynes, Graham; Dunmore, Katie
Cc: Chesney, Pete
Subject: RE: Biofilter monitoring at Daneshill Landfill

Table 4.1 in the BRef says:

Table 4.1: Biological treatments of waste

| Biological treatment | Brief description | Included in this document? |
|--|---|---|
| Aerobic treatment (including composting) | Biological decomposition of the organic content of wastes. Applied to solid waste, waste waters, bioremediation and to sludge and soil contaminated with oil. Composting consists of building piles of waste (windrows) to encourage the aerobic biodegradation of organic solids, producing a humic substance valuable as a soil conditioner or a growing media constituent. | See Section 4.2. Only <i>ex situ</i> bioremediation of contaminated soil is covered in this document (see Section 5.6) |

It specifically includes soil contaminated with oil (ex situ soil only).

We do end up with only the one effective mandatory BAT-AEL (H₂S/NH₃ or odour concentration). We can control the likely emissions from the process with emission limits - since we suspect dust and TVOC we monitor for them too and for dust shoehorn in a dust limit.

Looking at the existing permits we have some TVOC monitoring may not be a shock.

Note Dunton Technologies, Liverpool was given the monitoring as if it were MBT.

Dust is not universal in existing permits.

2 permits have no emissions monitoring at all.

| Operator | Site | Treatment Process or storage associated process | Description treatment |
|-----------------------------------|---|---|--|
| Biogenie Site Remediation Limited | Fawley Remediation Treatment and Recovery Facility - EPR/ZP3133RH | Biological treatment of waste | Bioremediation of hazar recovery. |
| Brett Aggregates Limited | Hithermoor Recycling And Recovery Facility - EPR/AB3006CE | Biological treatment of waste | Bioremediation of hazar recovery (S5.3) Bioremediation of non-h and recovery (S5.4) |
| Dunton Environmental Limited | Horseley Field Waste Treatment Facility EPR/BP3331DD | Biological treatment of waste | Ex-situ treatment of wa |

| | | | |
|-------------------------------------|--|-------------------------------|--|
| Dunton Technologies Limited | Ellesmere Port Waste Treatment Facility | Biological treatment of waste | Biological treatment of waste (enclosed biopiles, forced aeration) |
| Highfield Environmental Limited | Waste Treatment Facility at ICI (Teesport) No3 Landfill EPR/DP3531DS | Biological treatment of waste | Biological treatment - bioremediation of waste. Biological treatment - bioremediation of waste. |
| Keltbray AWS Limited | Mohawk Wharf Recycling Facility EPR/FP3092LH | Biological treatment of waste | Bioremediation of hazardous waste (not allowed too). Bioremediation of non-hazardous waste (not allowed too). |
| Mick George Ltd | Woodhatch Farm WTS EPR/EP3038VB | Biological treatment of waste | Biological treatment of waste and low VOC contamination. Biological treatment of waste and low VOC contamination. |
| Waste Recycling group (Central) Ltd | ERQ - STC, EPR/HP3632RP/V002 | Biological treatment of waste | Bioremediation process Bioremediation process Bioremediation process disposal. Bioremediation process recovery. |

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 I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 17 May 2022 11:47
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Hi Katie,

Yes the Healthcare permit review was done first so the permit is in the correct format for the BATCs. Total and speciated VOCs are the 2 test methods mentioned in our MCERTS guidance so better than specifying BTEX or something like that.

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I think it would be worth sharing with Abraham for a biowaste view on limits and process monitoring for biofilters too.

Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

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

Sent: 16 May 2022 16:12

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: Biofilter monitoring at Daneshill Landfill

Graham,

I've revised the FCC soil treatment facility permit with your comments, many thanks for these. I'd just like to check I'm on the right track with the biofilter monitoring which I think may be subject to scrutiny.

I've included TVOC and speciated VOC as you suggest from the healthcare template. Why do we use the healthcare template? I see the limit is the same as that detailed for physicochemical treatment of waste with calorific value.. Is it adapted from that?

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| | NH ₃ | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |
| | Dust | | 5mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |

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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Grange, Adam

From: Hall, Chris
Sent: 18 May 2022 11:23
To: Raynes, Graham; Dunmore, Katie
Cc: Chesney, Pete
Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham

The BAT conclusions are more tricky to negotiate than I would like.

If we say that biological treatment of soils is “Biological treatment of waste” then BAT is to monitor for H₂S/NH₃ or odour concentration in accordance with BAT 34 and Table 6.7.

We could say that this process is both “Biological treatment of waste” and “Physico-chemical treatment of solid and/or pasty waste” which would add in Dust but I think we can add in dust anyway.

We could say that this process is both “Biological treatment of waste” and “Physico-chemical treatment of waste with calorific value” and “Physico-chemical treatment of solid and/or pasty waste” which add in a mandatory 30 mg/m³ for TVOC.

I would like biological soil treaters to monitor for TVOC but we may not be able to set limits.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169
I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 18 May 2022 10:11
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Thanks Chris,

So we are saying there are no mandatory BAT-AELs for biological treatment of haz soils – bit confused. If mandatory TVOC limit would be needed?

I would be careful about setting limits for odour – the monitoring is expensive and we have previously only put limits in in exceptional cases. NH₃ may be simpler.

There is no way to put TVOC through H1 – would have to use a proxy like benzene as a worst case. We can set limits on individual substance if H1 shows an issue. I would have to look at the rationale behind how we set those as I'm not too familiar – usually we take our limits from the sector guidance/ Bref if needed, so not sure how we would set a particular limits without those.

OK with dust limit.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>

Sent: 18 May 2022 08:50

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>

Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham, Katie

I agree that talking with Abraham would be helpful.

My thoughts:

We should base monitoring on the likely emissions from the process.

We should base the limits on the BAT-AETs first which will be mandatory. Then for the other emissions we should base the limit on whether it is necessary to control the emission. The H1 might be the mechanism to do this.

Thus for biological treatment of soils* (not really thought of it as a mechanical biological treatment as it is not put into a mechanical device that turns it or pressurises it – the forced air flow is more related to the abatement than the treatment), they need to monitor for **odour** but they can alternatively monitor for **H₂S** and **NH₃**.

If the contaminant in the waste is oil or other organics then monitoring for TVOC and speciated should be done – there is no mandatory AEL so we could set a limit based on the H1 (either based on real data or on data collected via an improvement condition to do the H1) which could even determine that there is no need for a limit?

We are always going to suspect that particulate matter (dust) could be an issue but again no mandatory BAT-AEL. Where a limit is given it is usually 5 mg/m³ so we could simply go with that as a starting point. Otherwise do we go with the H1 (either based on real data or on data collected via an improvement condition to do the H1)?

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* All biological treatment processes for hazardous waste must be actively controlled for emissions – there should be no passive venting of emissions.

What do you think?

I probably need to accelerate the outlines for each of the treatment processes given in the BAT conclusions but there are issues with each of them which are confounding matters.

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Katie Dunmore
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Grange, Adam

From: Raynes, Graham
Sent: 18 May 2022 10:11
To: Hall, Chris; Dunmore, Katie
Cc: Chesney, Pete
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Sent: 18 May 2022 08:50
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
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From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 16 May 2022 16:12
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: Biofilter monitoring at Daneshill Landfill

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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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Grange, Adam

From: Dunmore, Katie
Sent: 05 May 2022 11:18
To: Raynes, Graham
Subject: RE: FCC. Daneshill Landfill proposed STF EPR/NP3538MF/V009

Hi Graham,

Thanks for this. I've just finished going through it.

I'll run the DD past legal.

Hopefully Chris can provide advice on the monitoring. I'm having a bit of a nightmare re-checking information on this. Some I took from templates and some from the application. I however accessed the application from EDRM which I no longer have and many docs have not transferred to DMS or temporary storage.

Kind regards

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

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From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 26 April 2022 15:15
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>
Subject: RE: FCC. Daneshill Landfill proposed STF EPR/NP3538MF/V009

Hi Katie,

Sorry this has taken longer than I expected.

I've gone through the permit and DD – comments attached. I've included Chris as (a) there is the partial refusal issue regarding the asbestos process, and (b) there are some specific comments on the permit conditions around what we should be doing under the BATCs/BAT-AEL for the bioremediation monitoring. Chris – can you look at the relevant parts and comment?

Happy to chat through – perhaps we can set a time next week?

Regards
Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

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From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 14 April 2022 15:55
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: FCC. Daneshill Landfill proposed STF EPR/NP3538MF/V009

Hi Graham,

As discussed. FCC docs attached.

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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Grange, Adam

From: Raynes, Graham
Sent: 17 May 2022 14:00
To: Dunmore, Katie
Subject: RE: Biofilter monitoring at Daneshill Landfill

Hi Katie,

No problem – sounds like we just take what we need for the biofilter if they don't want to be involved. Lets see what Chris thinks.

Graham

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 17 May 2022 13:49
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Thanks Graham,


I did speak to Abraham and Cathy Nichols earlier on in the permit determination, neither wanted to be involved passing it over to waste.

Everyone hated the CLO biofilter but couldn't come up with any ideas given the monitoring data provided. I'm therefore a bit nervous of getting others involved again at this stage. Hopefully Chris can provide further clarification or we go with the tighter TVOC. Hopefully it won't be an issue with the operator as they had proposed monthly monitoring of the previous parameters.

Kind regards

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

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Subject: Biofilter monitoring at Daneshill Landfill

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I've revised the FCC soil treatment facility permit with your comments, many thanks for these. I'd just like to check I'm on the right track with the biofilter monitoring which I think may be subject to scrutiny.

I've included TVOC and speciated VOC as you suggest from the healthcare template. Why do we use the healthcare template? I see the limit is the same as that detailed for physicochemical treatment of waste with calorific value.. Is it adapted from that?

I've also include NH3 with the limit 20mg/m3. Odour is also mentioned but do we not include as adding NH3. H2S is also detailed as a requirement however is this unlikely to arise from the bioremediation process?

| | | | | | | |
|---|---|---------------|----------------------|---|----------------|--------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | 30 mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 |
| | NH ₃ | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |
| | Dust | | 5mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |

Kind regards

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

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Grange, Adam

From: Chesney, Pete
Sent: 19 May 2022 09:34
To: Hall, Chris; Raynes, Graham
Cc: Dunmore, Katie
Subject: RE: Biofilter monitoring at Daneshill Landfill

Sorry, catching up on all the emails!

It seems totally bizarre to not have monitoring and limits for TVOCs on biological treatment of soils – e.g. biopiles etc. I guess dust from the biological treatment process (biopiles etc.) is perhaps less likely to be a concern – dust would perhaps be more of an issue from the tipping/removal of the soil before and after the process, which I guess wouldn't be directed to the point source emission anyway – e.g. if they've not yet put in/or have removed the gas extraction pipes etc.

If they have any mechanical treatment before or after the biological process (crushing/screening etc.), presumably we could apply the mechanical/or mechanical-biological AELs to any emissions from these processes?

Can't we apply the BAT AELs for dust/VOCs anyway, even if they're not "mandatory BAT AELs" – i.e. as benchmarks emission limits, because we think they're appropriate and will ensure emissions are controlled/abated in line with BAT in general? Similar to the way we're looking to apply relevant BAT AELs to waste operations, or the way we've applied emission limits to healthcare facilities, even though (strictly speaking) no AELs directly apply from the BATCs?

Pete

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 19 May 2022 09:25
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham thanks again.

I find the whole thing quite maddening. I am confused that soil washing which is a wet process has a dust monitoring requirement but biological treatment of soil which is a dry process does not. It is also odd that the mandatory monitoring for soil treatment is odour or NH₃/H₂S when only one of our existing permits includes this.

It would be unfortunate that we had less control over emissions after the permit review than before. I would be loath to remove too much monitoring for those sites that already have it but it would be good to get consistency across every site doing soil treatment. Not sure it is worth monitoring for each of TVOC TPH, BTEX, PAHs and TVOC 15 but it is worth getting all sites to monitor for TVOC and speciated VOCs to give us some consistency across each site.

This is a suggestion for emission limits for biological soil treatment. Could be run past the monitoring/emissions experts.

| Emission point ref. & location | Source | Parameter | Limit (incl |
|--------------------------------|--------|-----------|-------------|
|--------------------------------|--------|-----------|-------------|

| | | | |
|--|--|--|--|
| <p>Description of the emission point including its abatement</p> <p>Example: Soil treatment biofilter as shown on the layout plan in Schedule 7 as A1.</p> | <p>Soil treatment filter biofilter</p> | <p>Odour (Note 1)</p> | <p>1000 ouE_y</p> |
| | | <p>H₂S (Note 1)</p> | <p>No limit s</p> |
| | | <p>NH₃ (Note 1)</p> | <p>20 mg/m³</p> |
| | | <p>Total volatile organic compounds (TVOC)</p> | <p>No limit s</p> |
| | | <p>Speciated VOCs</p> | <p>Limit cont immediat OR Limit cont done from condition</p> |
| | | <p>Particulate Matter (Dust)</p> | <p>No limit s</p> |

Note 1 The monitoring of NH₃ and H₂S can be used as an alternative to the monitoring of the odour concentration. [Do we le
* These standards are taken from biowaste treatment permit for Biogen [Biowaste Treatment Permit Review - Permit Issued](#)

Abatement combinations

Adsorption
Biofilter
Fabric filter
Thermal oxidation
Wet scrubbing

Any help is welcomed – we need to bottom this out.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169
I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 18 May 2022 15:54
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Good spot – so this is definitely biological treatment but according to that table not MBT. It then refers to section 5.6 of the BRef, but that just leaves us up in the air as soil bioremediation isn't followed through into the BATCs – maybe they just gave up at that point?

So according to biological BATCs we should have for BAT-AELs:
 NH3 or odour

Plus any ELVs for other speciated contaminants in the inventory of emissions (e.g. Benzene if these are an issue (via usual H1 approach)).

And monitoring:
 NH3 or odour
 H2S

Plus speciated VOC for any other ELV, subject to H1 etc.

No dust or TVOCs though with this though.

The only part of 5.6 (ignoring thermal desorption as it's so dissimilar) to get into the BATC is soil washing – perhaps use this as a guide too? That wouldn't include any more BAT-AELs, but would include Dust and TVOC monitoring under BAT8.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 18 May 2022 14:16
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Table 4.1 in the BRef says:

Table 4.1: Biological treatments of waste

| Biological treatment | Brief description | Included in this document? |
|--|---|---|
| Aerobic treatment (including composting) | Biological decomposition of the organic content of wastes. Applied to solid waste, waste waters, bioremediation and to sludge and soil contaminated with oil. Composting consists of building piles of waste (windrows) to encourage the aerobic biodegradation of organic solids, producing a humic substance valuable as a soil conditioner or a growing media constituent. | See Section 4.2. Only <i>ex situ</i> bioremediation of contaminated soil is covered in this document (see Section 5.6) |

It specifically includes soil contaminated with oil (ex situ soil only).

We do end up with only the one effective mandatory BAT-AEL (H₂S/NH₃ or odour concentration). We can control the likely emissions from the process with emission limits -

since we suspect dust and TVOC we monitor for them too and for dust shoehorn in a dust limit.

Looking at the existing permits we have some TVOC monitoring may not be a shock.

Note Dunton Technologies, Liverpool was given the monitoring as if it were MBT.

Dust is not universal in existing permits.

2 permits have no emissions monitoring at all.

| Operator | Site | Treatment Process or storage associated process | Description treatment |
|-----------------------------------|--|---|--|
| Biogenie Site Remediation Limited | Fawley Remediation Treatment and Recovery Facility - EPR/ZP3133RH | Biological treatment of waste | Bioremediation of hazardous waste recovery. |
| Brett Aggregates Limited | Hithermoor Recycling And Recovery Facility - EPR/AB3006CE | Biological treatment of waste | Bioremediation of hazardous waste recovery (S5.3) Bioremediation of non-hazardous waste and recovery (S5.4) |
| Dunton Environmental Limited | Horseley Field Waste Treatment Facility EPR/BP3331DD | Biological treatment of waste | Ex-situ treatment of waste |
| Dunton Technologies Limited | Ellesmere Port Waste Treatment Facility | Biological treatment of waste | Biological treatment of waste (enclosed biopiles, forced aeration) |
| Highfield Environmental Limited | Waste Treatment Facility at ICI (Teesport) No3 Landfill EPR/DP3531DS | Biological treatment of waste | Biological treatment - bioremediation of hazardous waste. Biological treatment - bioremediation of non-hazardous waste. |
| Keltbray AWS Limited | Mohawk Wharf Recycling Facility EPR/FP3092LH | Biological treatment of waste | Bioremediation of hazardous waste Bioremediation of non-hazardous waste (allowed too). |
| Mick George Ltd | Woodhatch Farm WTS EPR/EP3038VB | Biological treatment of waste | Biological treatment of waste and low VOC contamination Biological treatment of waste and low VOC contamination |

| | | | |
|-------------------------------------|------------------------------|-------------------------------|--|
| Waste Recycling group (Central) Ltd | ERQ - STC, EPR/HP3632RP/V002 | Biological treatment of waste | Bioremediation process Bioremediation process Bioremediation process disposal. Bioremediation process recovery. |
|-------------------------------------|------------------------------|-------------------------------|--|

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Environment & Business

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I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Sent: 18 May 2022 12:12

To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>

Subject: RE: Biofilter monitoring at Daneshill Landfill

I would say it falls more biological than physchem, if we are saying the treatment is bugs biodegrading the organic contaminants. There is no chemical reactions to speak of. For physical treatment – turning/incorporation of organics, (+volatilisation?)

If we classify it as mechanical biological treatment we get ELVs for:

BAT-associated emission levels (BAT-AELs) for channelled NH₃, odour, dust and TVOC emissions to air from the biological treatment of waste

| Parameter | Unit | BAT-AEL (Average over the sampling period) | Waste treatment process |
|-----------------------------|----------------------------------|---|--|
| NH ₃ (1) (2) | mg/Nm ³ | 0,3-20 | All biological treatments of waste |
| Odour concentration (1) (2) | ou _e /Nm ³ | 200-1 000 | |
| Dust | mg/Nm ³ | 2-5 | Mechanical biological treatment of waste |
| TVOC | mg/Nm ³ | 5-40 (3) | |

(1) Either the BAT-AEL for NH₃ or the BAT-AEL for the odour concentration applies.

(2) This BAT-AEL does not apply to the treatment of waste mainly composed of manure.

(3) The lower end of the range can be achieved by using thermal oxidation.

Plus monitoring for the above (NH₃ or odour) and H₂S.

MBT is defined as:

| | |
|--|---|
| Mechanical biological treatment (MBT) | Treatment of mixed solid waste combining mechanical treatment with biological treatment such as aerobic or anaerobic treatment. |
|--|---|

Not looked at the Bref though not sure if this stretches the definition of MBT? To me it would seem a specialist sub category or it.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>

Sent: 18 May 2022 11:23

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>

Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham

The BAT conclusions are more tricky to negotiate than I would like.

If we say that biological treatment of soils is “Biological treatment of waste” then BAT is to monitor for H₂S/NH₃ or odour concentration in accordance with BAT 34 and Table 6.7.

We could say that this process is both “Biological treatment of waste” and “Physico-chemical treatment of solid and/or pasty waste” which would add in Dust but I think we can add in dust anyway.

We could say that this process is both ““Biological treatment of waste” and “Physico-chemical treatment of waste with calorific value” and “Physico-chemical treatment of solid and/or pasty waste” which add in a mandatory 30 mg/m³ for TVOC.

I would like biological soil treaters to monitor for TVOC but we may not be able to set limits.

Dr Chris Hall
Senior Advisor
Environment Agency
Environment & Business

Tel: 02030 251169

I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Sent: 18 May 2022 10:11

To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>

Subject: RE: Biofilter monitoring at Daneshill Landfill

Thanks Chris,

So we are saying there are no mandatory BAT-AELs for biological treatment of haz soils – bit confused. If mandatory TVOC limit would be needed?

I would be careful about setting limits for odour – the monitoring is expensive and we have previously only put limits in in exceptional cases. NH₃ may be simpler.

There is no way to put TVOC through H1 – would have to use a proxy like benzene as a worst case. We can set limits on individual substance if H1 shows an issue. I would have to look at the rationale behind how we set those as I'm not too familiar – usually we take our limits from the sector guidance/ Bref if needed, so not sure how we would set a particular limits without those.

OK with dust limit.

Graham

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 18 May 2022 08:50
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Chesney, Pete <peter.chesney@environment-agency.gov.uk>
Subject: RE: Biofilter monitoring at Daneshill Landfill

Graham, Katie

I agree that talking with Abraham would be helpful.

My thoughts:

We should base monitoring on the likely emissions from the process.

We should base the limits on the BAT-AETs first which will be mandatory. Then for the other emissions we should base the limit on whether it is necessary to control the emission. The H1 might be the mechanism to do this.

Thus for biological treatment of soils* (not really thought of it as a mechanical biological treatment as it is not put into a mechanical device that turns it or pressurises it – the forced air flow is more related to the abatement than the treatment), they need to monitor for **odour** but they can alternatively monitor for **H₂S** and **NH₃**.

If the contaminant in the waste is oil or other organics then monitoring for TVOC and speciated should be done – there is no mandatory AEL so we could set a limit based on the H1 (either based on real data or on data collected via an improvement condition to do the H1) which could even determine that there is no need for a limit?

We are always going to suspect that particulate matter (dust) could be an issue but again no mandatory BAT-AEL. Where a limit is given it is usually 5 mg/m³ so we could simply go with that as a starting point. Otherwise do we go with the H1 (either based on real data or on data collected via an improvement condition to do the H1)?

So:

| | | | | | | |
|---|---|---------------|---|---|----------------|--------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | Limit contrived from H1 immediate OR Limit contrived from H1 done from improvement condition OR No limit set?? | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
| | Speciated VOCs | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | CEN TS 13649 |
| | Odour | | 1000 ouE/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | EN 13725 |
| | Particulate Matter (Dust) | | 5mg/m ³ OR Limit contrived from H1 immediate OR Limit contrived from H1 done from improvement condition OR No limit set?? | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | EN 13284-1 |

* All biological treatment processes for hazardous waste must be actively controlled for emissions – there should be no passive venting of emissions.

What do you think?

I probably need to accelerate the outlines for each of the treatment processes given in the BAT conclusions but there are issues with each of them which are confounding matters.

Dr Chris Hall
Senior Advisor

**Environment Agency
Environment & Business**

Tel: 02030 251169

I work Monday to Thursday

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Sent: 17 May 2022 11:47

To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>

Subject: RE: Biofilter monitoring at Daneshill Landfill

Hi Katie,

Yes the Healthcare permit review was done first so the permit is in the correct format for the BATCs. Total and speciated VOCs are the 2 test methods mentioned in our MCERTS guidance so better than specifying BTEX or something like that.

NH3 is an analogue for odour – this process shouldn't be too odorous as there are primarily traces of oil in soil rather than a fully biodegradable process like composting.

Chris is working on the Chem waste template so I've copied him in – Chris have you given any thought yet to soil treatment? Looking at the process – should limits be based on those given in Table 6.7 for biological treatment of waste for this type of process? I would expect it fits into mechanical biological as it has forced air flow under suction? Has a slightly higher TVOC (40mg/m3) than phys-chem. Could do with your thoughts on how NH3, Odour and H2S fit into the picture. Maybe go with NH3 limit alone?

I think it would be worth sharing with Abraham for a biowaste view on limits and process monitoring for biofilters too.

Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B

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graham.raynes@environment-agency.gov.uk

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

Sent: 16 May 2022 16:12

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: Biofilter monitoring at Daneshill Landfill

Graham,

I've revised the FCC soil treatment facility permit with your comments, many thanks for these. I'd just like to check I'm on the right track with the biofilter monitoring which I think may be subject to scrutiny.

I've included TVOC and speciated VOC as you suggest from the healthcare template. Why do we use the healthcare template? I see the limit is the same as that detailed for physicochemical treatment of waste with calorific value.. Is it adapted from that?

I've also include NH3 with the limit 20mg/m3. Odour is also mentioned but do we not include as adding NH3. H2S is also detailed as a requirement however is this unlikely to arise from the bioremediation process?

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|---|---|---------------|----------------------|---|----------------|--------------|
| Biofilter As shown on soil treatment activity layout plan?? | Total volatile organic compounds (TVOC) | STF biofilter | 30 mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | BS EN 12619 |
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| | NH ₃ | | No limit set | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |
| | Dust | | 5mg/m ³ | Average value of 3 consecutive measurements of at least 30 minutes each | Every 6 months | |

Kind regards

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

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Grange, Adam

From: Wall, Clive
Sent: 09 March 2022 11:10
To: Dunmore, Katie; Hall, Chris; Raynes, Graham
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Hello Katie,

As I have said previously, I'm not aware the biofilter is constructed from waste at Edwin Richards and cant see how the permit would allow it. How will this be incorporated into the Daneshill permit? Will there be a table with waste codes permitted to construct the biofilter from?

Clive

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 09 March 2022 10:56
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Cc: Wall, Clive <clive.wall@environment-agency.gov.uk>
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Hi All,

Thanks for your comments.

I don't feel able to consider the screener. Our guidance is simple on this, just stating the process needs to be enclosed and abated by HEPA filter which FCC have offered. However considering the wider asbestos proposals and the significant local opposition to these open air activities asbestos operations are not considered acceptable at Daneshill.

FCC's response doesn't offer any further assurance with regards to the asbestos storage and picking activities. Soils are still maintained in loose stockpiles with only tarpaulin covers etc.

Having discussed with my team the asbestos treatment activity will be refused in its entirety. Bioremediation will be permitted. This is the site where FCC propose to use a waste material bio filter (EWC 19 05 03). Based on the 18 months of monitoring data from Rowley Regis which they state is also waste we have agreed to permit this. An IC will be used however to ensure the filter is effective and media replaced if necessary.

Kind regards

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

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

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From: Hall, Chris
Sent: 07 March 2022 13:31
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Wall, Clive <clive.wall@environment-agency.gov.uk>
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Katie and Graham

Sorry it has taken so long to get back to you. I have been very busy and also had some leave. We have not changed our stance on enclosure of the screener to my knowledge although Clive may be able to tell you more.

I read the Nicole report before and skimmed it again. Remediation on the site of the contaminated land and fixed plant installations for treatment of soils are entirely different scenarios. The former takes place under mobile plant rules determined by the remediation teams. The work on site lasts a short period of time and is risk assessed against the needs of the site on a case by case basis. Installations will take in waste day after day, year after year ad infinitum and they have to adhere to the appropriate measures guidance just like every other installation site. That means in this instance enclosure of the plant and equipment.

Chris

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 24 February 2022 18:45
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: FW: Daneshill Landfill. Asbestos soil screening and BAT 14

Chris,

FCC appear have provided Katie further justification at Daneshill – in particular:

Storage will be on the open pads but covered with sheeting between delivery and treatment.

For the proposed pre-screener they are covering and abating via a HEPA filter. Is this a development from the Rowley Regis pre-app? Has anything been agreed there?

They are also challenging why we are requiring such tight control and refer to a 'Nicole' Report (I'm not familiar with it – are you?) asking what is our evidence for fibre release.

Conveyors from screen to picking station are appear covered though Katie says uncovered – not sure. Covered would be BAT I would say – given they're in the open. The waste is damped on the way into the picking stations so would appear to not be before that stage.

Picking station itself appears OK – same design as they already use.

See also notes below in red.

What do you think?

Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B
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graham.raynes@environment-agency.gov.uk

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

Sent: 24 February 2022 14:56

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: Daneshill Landfill. Asbestos soil screening and BAT 14

Hi Graham,

FCC have provided further justification for their proposed asbestos soil screening and hand picking operations at the above site. I had previously confirmed with the operator these activities would be refused given we did not consider the proposal met BAT 14, in particular containment, collection and treatment of diffuse emissions.

FCC's have made an additional submission in support of their application which I have attached. I have the following questions and comments as to whether the submission provides appropriate assurance and I'd appreciate your advice as to whether we should stick with a refusal of this activity.

To summarise all storage and treatment activities are still proposed to be undertaken outside with the picking operation undertaken in a mobile above ground picking station with plastic weather covering like structure. The screener and conveyers leading to it are now enclosed with HEPA filtration as described in the document. Boundary monitoring and has been tightened up. The operator now proposes to monitor outside the picking station. I'm still however unsure if this monitoring is reliable or possible down to the detection limits FCC describe.

Monitoring. FCC confirm monitoring results will be available within 1hr of sampling. Mitigation undertaken if fibres detected above 0.001f/ml. Is this possible in an external environment? **Depends – not going to catch the asbestos as after the fact – would only be evidence of some other problem likely fibrous asbestos has slipped through. What is the mitigation proposed? Asbestos fibre limit of detection = 0.001 fibres/ml according to the ambient monitoring method we specify, so must be achievable. They're basically saying if they detect anything they'll apply (unspecified) mitigation.**

Boundary monitoring has a detection limit of 0.0005f/ml again is this something we could rely on outside? **Not sure – seems low. Maybe better techniques used now? Chris are you aware of lower LOD methods?**

The monitoring plan referenced shows a couple of monitoring location on each treatment pad. This will need further clarification as previously FCC confirmed asbestos operations would be mobile from one pad to another with no dedicated location. This document now confirms asbestos storage and processing will be on a dedicated pad. **Monitoring has to be flexible as it is dependant on the wind direction. Upwind sampling is needed to establish without doubt the source. They possibly need to specify several of locations around the process, but not necessarily monitor all of them on a particular run. Minimum they should cover the directions of sensitive receptors – I can't remember if there were any close here.**

Picking station and screener

Is the proposed screener in line with the proposal at Rowley Regis? **Chris – as above**

The screener is now enclosed with monitored HEPA filter. Hopefully diffuse emissions from the activity could be avoided. My concern however is that asbestos pieces will be broken by the agitation. The output soils will then be discharged into the picking station. **They will be within the abated screener, so free fibres produced should be abated. Some abrasion is likely in any handling. Also we have permitted this at Rowley as long as it is enclosed and abated, so I don't think we can backtrack here for this.**

As previously detailed this is a mobile unit with windows and flimsy cover. I would consider without screening this could be OK based on the fibre content of the soils at Waste Acceptance. Now however I'm concerned these soils will have a higher fibre load due to passing through the screener. **Again – we have accepted this arrangement in principle at Rowley – they say this is the same design.**

The input and output conveyors are uncovered with water suppression provided by spray rail – don't think this is enough. **Input covered prior to spray rail seems BAT to me. Outward too? Chris?**

My thoughts

Based on the WAP limits for fibres within the soil we could potentially permit the hand picking activity. Without the agitation of screening the methods proposed seem robust enough to prevent asbestos pieces breaking and fibre emissions unlikely.

For the reasons stated above I think the screening still doesn't meet BAT because it will increase the fibre load of the soil which would then be released by use of open conveyers, handpicking, dropping into storage piles. **As per above we've accepted it at Rowley provided it is adequately enclosed and abated – can we go back on it now?**

Any thoughts you have would be gratefully received and how this might fit into the use of the screen at Rowley Regis.

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

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Grange, Adam

From: Dunmore, Katie
Sent: 09 March 2022 10:56
To: Hall, Chris; Raynes, Graham
Cc: Wall, Clive
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Hi All,

Thanks for your comments.

I don't feel able to consider the screener. Our guidance is simple on this, just stating the process needs to be enclosed and abated by HEPA filter which FCC have offered. However considering the wider asbestos proposals and the significant local opposition to these open air activities asbestos operations are not considered acceptable at Daneshill.


FCC's response doesn't offer any further assurance with regards to the asbestos storage and picking activities. Soils are still maintained in loose stockpiles with only tarpaulin covers etc.

Having discussed with my team the asbestos treatment activity will be refused in its entirety. Bioremediation will be permitted. This is the site where FCC propose to use a waste material bio filter (EWC 19 05 03). Based on the 18 months of monitoring data from Rowley Regis which they state is also waste we have agreed to permit this. An IC will be used however to ensure the filter is effective and media replaced if necessary.

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Katie Dunmore
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From: Hall, Chris
Sent: 07 March 2022 13:31
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Wall, Clive <clive.wall@environment-agency.gov.uk>
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Katie and Graham

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Chris

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Sent: 24 February 2022 18:45
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
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What do you think?

Graham
Graham Raynes
Senior Permitting Officer, National Permitting Service - part of National Services E&B
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

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Internal: **30600**

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

Sent: 24 February 2022 14:56

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

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Grange, Adam

From: Wall, Clive
Sent: 07 March 2022 15:00
To: Hall, Chris; Raynes, Graham; Dunmore, Katie
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Hello

No change of stance for Edwin Richards. We rejected their second submission about enclosing the screener end of last year. They requested a meeting to discuss further as they said 'it is not clear what the expectation is for **'all dust emissions from the screening operation are directed to an active abatement system...or how it would practically be achieved given that it is a soil screen and materials must at some point exit from it whether that be off the end of a conveyor or taken from a stockpile.'**

However I couldn't get Chris Lowe to respond to a meeting request and there has been no further communication. Perhaps they are trying to get it permitted elsewhere and then come back to us?

Clive

From: Hall, Chris <chris.hall@environment-agency.gov.uk>
Sent: 07 March 2022 13:31
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Wall, Clive <clive.wall@environment-agency.gov.uk>
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Katie and Graham

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Grange, Adam

From: Dunmore, Katie
Sent: 09 March 2022 11:44
To: Wall, Clive; Hall, Chris; Raynes, Graham
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Hi Clive,

No, FCC are not permitted to operate a waste filter at Rowley Regis and I think it is a compliance issue.

I've been all over the houses with this via biowaste leads in E&B and whether we can accept monitoring data collected from non-compliant sites, whether we should enforce the use of a standard filter media and CLO use be dealt with outside the permitting process (FCC have provided a list of sites using CLO filters without appropriate permits).

I was hoping we could get an Agency wide approach to permitting waste filters and compliance dealt with accordingly. Lots of concerns have been raised about the filters but I have received no advice on a way forward. Given this my TL has stated we need to take my application at face value and accept FCC's statements unless we can be sure they are lying and the data provided is from a normal filter.

Clive, if you have any compliance checks on their filters and you're sure its non-waste this will change things though.

Kind regards

Katie Dunmore
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Sent: 09 March 2022 11:10
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>; Hall, Chris <chris.hall@environment-agency.gov.uk>; Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: RE: Daneshill Landfill. Asbestos soil screening and BAT 14

Hello Katie,

As I have said previously, I'm not aware the biofilter is constructed from waste at Edwin Richards and cant see how the permit would allow it. How will this be incorporated into the Daneshill permit? Will there be a table with waste codes permitted to construct the biofilter from?

Clive

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 09 March 2022 10:56
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Cc: Wall, Clive <clive.wall@environment-agency.gov.uk>
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Hi Graham,

FCC have provided further justification for their proposed asbestos soil screening and hand picking operations at the above site. I had previously confirmed with the operator these activities would be refused given we did not consider the proposal met BAT 14, in particular containment, collection and treatment of diffuse emissions.

FCC's have made an additional submission in support of their application which I have attached. I have the following questions and comments as to whether the submission provides appropriate assurance and I'd appreciate your advice as to whether we should stick with a refusal of this activity.

To summarise all storage and treatment activities are still proposed to be undertaken outside with the picking operation undertaken in a mobile above ground picking station with plastic weather covering like structure. The screener and conveyers leading to it are now enclosed with HEPA filtration as described in the document. Boundary monitoring and has been tightened up. The operator now proposes to monitor outside the picking station. I'm still however unsure if this monitoring is reliable or possible down to the detection limits FCC describe.

Monitoring. FCC confirm monitoring results will be available within 1hr of sampling. Mitigation undertaken if fibres detected above 0.001f/ml. Is this possible in an external environment? **Depends – not going to catch the asbestos as after the fact – would only be evidence of some other problem likely fibrous asbestos has slipped through. What is the mitigation proposed? Asbestos fibre limit of detection = 0.001 fibres/ml according to the ambient monitoring method we specify, so must be achievable. They're basically saying if they detect anything they'll apply (unspecified) mitigation.**

Boundary monitoring has a detection limit of 0.0005f/ml again is this something we could rely on outside? **Not sure – seems low. Maybe better techniques used now? Chris are you aware of lower LOD methods?**

The monitoring plan referenced shows a couple of monitoring location on each treatment pad. This will need further clarification as previously FCC confirmed asbestos operations would be mobile from one pad to another with no dedicated location. This document now confirms asbestos storage and processing will be on a dedicated pad. **Monitoring has to be flexible as it is dependant on the wind direction. Upwind sampling is needed to establish without doubt the source. They possibly need to specify several of locations around the process, but not necessarily monitor all of them on a particular run. Minimum they should cover the directions of sensitive receptors – I can't remember if there were any close here.**

Picking station and screener

Is the proposed screener in line with the proposal at Rowley Regis? **Chris – as above**

The screener is now enclosed with monitored HEPA filter. Hopefully diffuse emissions from the activity could be avoided. My concern however is that asbestos pieces will be broken by the agitation. The output soils will then be discharged into the picking station. **They will be within the abated screener, so free fibres produced should be abated. Some abrasion is likely in any handling. Also we have permitted this at Rowley as long as it is enclosed and abated, so I don't think we can backtrack here for this.**

As previously detailed this is a mobile unit with windows and flimsy cover. I would consider without screening this could be OK based on the fibre content of the soils at Waste Acceptance. Now however I'm concerned these soils will have a higher fibre load due to passing through the screener. **Again – we have accepted this arrangement in principle at Rowley – they say this is the same design.**

The input and output conveyors are uncovered with water suppression provided by spray rail – don't think this is enough. **Input covered prior to spray rail seems BAT to me. Outward too? Chris?**

My thoughts

Based on the WAP limits for fibres within the soil we could potentially permit the hand picking activity. Without the agitation of screening the methods proposed seem robust enough to prevent asbestos pieces breaking and fibre emissions unlikely.

For the reasons stated above I think the screening still doesn't meet BAT because it will increase the fibre load of the soil which would then be released by use of open conveyers, handpicking, dropping into storage piles. **As per above we've accepted it at Rowley provided it is adequately enclosed and abated – can we go back on it now?**

Any thoughts you have would be gratefully received and how this might fit into the use of the screen at Rowley Regis.

Kind regards

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

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

mob: 07584 369561

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Grange, Adam

From: Raynes, Graham
Sent: 26 April 2022 15:15
To: Dunmore, Katie; Hall, Chris
Subject: RE: FCC. Daneshill Landfill proposed STF EPR/NP3538MF/V009
Attachments: LIT 12001 - Notice of variation and consolidation single permit GR01.docm; LIT 11951 - Decision document variationGR01.docm

Hi Katie,

Sorry this has taken longer than I expected.

I've gone through the permit and DD – comments attached. I've included Chris as (a) there is the partial refusal issue regarding the asbestos process, and (b) there are some specific comments on the permit conditions around what we should be doing under the BATCs/BAT-AEL for the bioremediation monitoring. Chris – can you look at the relevant parts and comment?

Happy to chat through – perhaps we can set a time next week?

Regards
Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

External: **020302 50600**

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

Sent: 14 April 2022 15:55

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Subject: FCC. Daneshill Landfill proposed STF EPR/NP3538MF/V009

Hi Graham,

As discussed. FCC docs attached.

Kind regards

Katie Dunmore

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

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

mob: 07584 369561

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Grange, Adam

From: Tucker, Tania
Sent: 29 November 2021 15:29
To: Nicholls, Kathy
Subject: RE: Off-spec compost 19 05 03 as a biofilter

Thanks Kathy – do you have any guidance on them so I can get my head around empty bed residence time and the residence time of the bio filter. Presume that's the efficiency of the bugs to breakdown odour causing compounds?
Cheers Tan

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Environment Agency

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External: 020 302 56785 | Mobile: 07778050209

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Grange, Adam

From: Nicholls, Kathy
Sent: 29 November 2021 15:33
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Grange, Adam

From: Tucker, Tania
Sent: 29 November 2021 15:36
To: Nicholls, Kathy
Subject: RE: Off-spec compost 19 05 03 as a biofilter

Fab thanks – just when you are feeling better

Hope you feel better soon

Tan

Tania Tucker

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Grange, Adam

From: Siddle, Sophie
Sent: 29 November 2021 16:57
To: Nicholls, Kathy; Tucker, Tania
Subject: RE: Off-spec compost 19 05 03 as a biofilter

Hi Tan (and Kathy)

I haven't come across this before and in the absence of the specific details I have the following general comments to make on the suitability of this as a biofilter medium.

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I'm assuming that it's the oversize following the composting process and it's not off-spec for any other reason i.e fine compost which hasn't met the stabilisation test etc.

I'd be interested to know how they are going to 'specifically produce' the biofilter medium. A good biofilter medium has uniform particle size, is homogenous with good porosity. Generally oversize contains a mix of hard/soft woods, possibly some treated wood etc. Also if they need to screen to a smaller size to remove plastics etc they risk creating a finer material losing porosity and compaction can also occur. This will depend on their processing techniques and could be an expense they are initially trying to bypass by offering it as a biofilter medium.

I agree with Kathy's point about characterising the gases first before determining the design and dosing procedure. Has this been done? We would need to know what they are remediating at the STP, what gases are produced, and therefore to be treated, and what is the most effective way to do this. This should be backed up with data.

It's hard to comment on the effectiveness of the tarpaulin cover without understanding the design of the bio-filter and the flow rate etc. They only state it will retain moisture content and contain odour emissions. How are they to maintain air flow and moisture for efficacy?

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Sophie

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Sent: 29 November 2021 13:35
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Grange, Adam

From: Tucker, Tania
Sent: 30 November 2021 08:08
To: Siddle, Sophie; Nicholls, Kathy
Subject: RE: Off-spec compost 19 05 03 as a biofilter

Thanks – both really appreciate the info. I haven't had to deal with biofilters in the metals recycling sector so a bit clueless. Any other info you think would be good for me to read let me know.

Thanks again
Tan

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Tania Tucker

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Environment Agency

tania.tucker@environment-agency.gov.uk

External: 020 302 56785 | Mobile: 07778050209

Working days: Monday to Friday

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for people and wildlife**



Grange, Adam

From: Dunmore, Katie
Sent: 10 January 2022 09:26
To: Tucker, Tania
Subject: RE: Off-spec compost 19 05 03 as a biofilter

Hi Tania,

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From: Siddle, Sophie
Sent: 29 November 2021 16:57
To: Nicholls, Kathy <kathryn.nicholls@environment-agency.gov.uk>; Tucker, Tania <tania.tucker@environment-agency.gov.uk>
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Grange, Adam

From: Leberman, Howard
Sent: 17 January 2022 13:49
To: Tucker, Tania
Subject: RE: Off-spec compost 19 05 03 as a biofilter

Tania,
My view is that we reject use 19 05 03 as a filter medium but deal with it as an improvement condition under time and materials – with national input.

We do not approve use until all issues are dealt with.

All our assessment work is cost recovered.

We can set the requirements out in an IC – if they make the necessary demonstrations in their IC response, we then vary their permit to allow 19 05 03.

This way, we do not hold up the permitting assessment process which eats into our time, costs and resources.

What do you think?

From: Tucker, Tania <tania.tucker@environment-agency.gov.uk>
Sent: 17 January 2022 08:49
To: Leberman, Howard <howard.leberman@environment-agency.gov.uk>
Subject: FW: Off-spec compost 19 05 03 as a biofilter

Hi Howard

Is it mean for me to shove this back to NPS to pick up with the odour experts. I am minded to say based on the info provided by Kathy and Sophie below they can push back and ask for efficacy tests and further info based on that. NPS should raise further questions around odour with the odour team because I am not an expert. I also think if its part of the application it needs to be determined with the application even if that is refusing it based on lack of evidence.

Any thoughts?

Tania Tucker
E&B Senior Advisor (Non-hazardous & inert waste sector lead)
Environment Agency

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Sent: 29 November 2021 16:57

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Grange, Adam

From: Tucker, Tania
Sent: 27 January 2022 09:38
To: Dunmore, Katie
Subject: RE: Off-spec compost 19 05 03 as a biofilter

Hi Katie

I am flat out on urgent must do stuff today. I am free after 11:30 tomorrow if that works?

Cheers Tan

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From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 27 January 2022 09:36
To: Tucker, Tania <tania.tucker@environment-agency.gov.uk>
Subject: FW: Off-spec compost 19 05 03 as a biofilter

Hi Tania,

Following on from my email below. Are you available to have a call regarding the use of the CLO bio filter?

Kind regards

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Tania Tucker

E&B Senior Advisor (Non-hazardous & inert waste sector lead)

Environment Agency

tania.tucker@environment-agency.gov.uk

External: 020 302 56785 | Mobile: 07778050209

Working days: Monday to Friday



Grange, Adam

From: Nicholls, Kathy
Sent: 29 November 2021 13:35
To: Tucker, Tania; Siddle, Sophie
Subject: RE: Off-spec compost 19 05 03 as a biofilter

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Your welcome

From: Tucker, Tania
Sent: 29 November 2021 11:00
To: Nicholls, Kathy <kathryn.nicholls@environment-agency.gov.uk>; Siddle, Sophie <sophie.siddle@environment-agency.gov.uk>
Subject: Off-spec compost 19 05 03 as a biofilter

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for people and wildlife**



Grange, Adam

From: Tucker, Tania
Sent: 08 February 2022 11:49
To: Dunmore, Katie
Subject: FW: Off-spec compost 19 05 03 as a biofilter

Tania Tucker
E&B Senior Advisor (Non-hazardous & inert waste sector lead)
Environment Agency

tania.tucker@environment-agency.gov.uk

From: Siddle, Sophie <sophie.siddle@environment-agency.gov.uk>
Sent: 29 November 2021 16:57
To: Nicholls, Kathy <kathryn.nicholls@environment-agency.gov.uk>; Tucker, Tania <tania.tucker@environment-agency.gov.uk>
Subject: RE: Off-spec compost 19 05 03 as a biofilter

Hi Tan (and Kathy)

I haven't come across this before and in the absence of the specific details I have the following general comments to make on the suitability of this as a biofilter medium.

As there is little info provided, my initial gut feeling was that it sounds like a way to legitimise the disposal of the oversize, but I'm happy to be proven wrong on that one.

I'm assuming that it's the oversize following the composting process and it's not off-spec for any other reason i.e fine compost which hasn't met the stabilisation test etc.

I'd be interested to know how they are going to 'specifically produce' the biofilter medium. A good biofilter medium has uniform particle size, is homogenous with good porosity. Generally oversize contains a mix of hard/soft woods, possibly some treated wood etc. Also if they need to screen to a smaller size to remove plastics etc they risk creating a finer material losing porosity and compaction can also occur. This will depend on their processing techniques and could be an expense they are initially trying to bypass by offering it as a biofilter medium.

I agree with Kathy's point about characterising the gases first before determining the design and dosing procedure. Has this been done? We would need to know what they are remediating at the STP, what gases are produced, and therefore to be treated, and what is the most effective way to do this. This should be backed up with data.

It's hard to comment on the effectiveness of the tarpaulin cover without understanding the design of the bio-filter and the flow rate etc. They only state it will retain moisture content and contain odour emissions. How are they to maintain air flow and moisture for efficacy?

I've put some other comments below in green, mainly agreeing with Kathy's comments.

Sophie

From: Nicholls, Kathy
Sent: 29 November 2021 13:35
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Working days: Monday to Friday

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Grange, Adam

From: Tucker, Tania
Sent: 17 January 2022 08:49
To: Leberman, Howard
Subject: FW: Off-spec compost 19 05 03 as a biofilter

Hi Howard

Is it mean for me to shove this back to NPS to pick up with the odour experts. I am minded to say based on the info provided by Kathy and Sophie below they can push back and ask for efficacy tests and further info based on that. NPS should raise further questions around odour with the odour team because I am not an expert. I also think if its part of the application it needs to be determined with the application even if that is refusing it based on lack of evidence.

Any thoughts?

Tania Tucker
E&B Senior Advisor (Non-hazardous & inert waste sector lead)
Environment Agency

tania.tucker@environment-agency.gov.uk

From: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Sent: 10 January 2022 09:26
To: Tucker, Tania <tania.tucker@environment-agency.gov.uk>
Subject: RE: Off-spec compost 19 05 03 as a biofilter

Hi Tania,

I'm just checking in with this and wondering whether the permitting process is actually the right route to authorise the use waste EWC 19 05 03 as a filter medium?

I'm concerned we could be stuck with a protracted assessment which could be avoided if the operator installs a standard non-waste filter medium. Given the operators evidence is based upon unpermitted operations and the high level of scrutiny authorising this activity will require should the assessment be dealt with by yourselves outside the permitting process? If authorised permit variations would then be required and/or compliance dealt with separately.

From the information presented so far and discussions with the applicants consultant it appears their evidence for the wastes efficacy is based upon monitoring data from what they state is a similar filter already operating at Rowley Regis. The AQA assessment provided is based on this data but does not contain information on source term, emissions concentrations or emissions rates. There doesn't seem to have been specific characterisation of the gas streams.

This assessment only covers human health impacts of the four main VOC's. The OMP is lacking any detail of nuisance impacts from the filter and there is no information provided on bio aerosols.

Bio filter aside, this application has many non-standard operating techniques proposed which are leading to a challenging determination. I'm trying to gain control by considering what should and should be included in our assessment. The application has attracted a lot of local interest and a lot of these concerns draw attention to historic nuisance and the site not being a good neighbour. This doesn't lend itself to allowing non-standard activities to run under temporary evidence gathering conditions.

Considering this could you consider if the filter medium could be assessed outside of this process by yourselves. Alternatively if we do need to consider it now would you be able to provide a list of questions I could work into a Schedule 5 request? If we do push back the assessment we would need to provide an outline of information requirements.

It would be useful to chat this through. Are you free Wednesday morning? I have a call at 11 -11.30 but aside from this I'm free.

Kind regards

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

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

mob: 07584 369561

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

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From: Tucker, Tania
Sent: 30 November 2021 08:16
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: FW: Off-spec compost 19 05 03 as a biofilter

Hi Katie

I have contacted my colleagues re the proposed biofilter. Some useful comments below. Regards Tan

Tania Tucker
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Sent: 29 November 2021 11:00
To: Nicholls, Kathy; Siddle, Sophie
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Grange, Adam

From: Tucker, Tania
Sent: 18 November 2021 14:04
To: Dunmore, Katie
Subject: RE: EWC 19 05 03 as a biofilter medium

Cheers for the update Katie.

I am going to have a chat with my colleagues (Kathy in biowaste) and my odour guru colleagues too. I may circulate to the odour network too. I share your unease.

Be very interested in the details of the sites it has been used – odd they don't seem to want to provide them?

Cheers Tan

Tania Tucker

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Environment Agency

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From: Dunmore, Katie
Sent: 18 November 2021 13:23
To: Tucker, Tania <tania.tucker@environment-agency.gov.uk>
Subject: EWC 19 05 03 as a biofilter medium

Hi Tania,

I've received the below response from FCC as to why 19 05 03 is considered a suitable biofilter medium and how it meets BAT.

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Considering they need to cover the filter medium to reduce the potential for odour doesn't fill me with confidence.

I've asked which sites have this type of biofilter. This was raised across centre by the PPO group and it hadn't come up before.

I'm slightly concerned about accepting evidence from previous sites. This Daneshill application almost entirely comprises evidence (which I can't verify) from their other sites that they consider evidences there is no risk of emissions. This is particularly stark for the lack of mitigation for asbestos soil treatment. Its proving tricky to assess.

Any further thoughts you have on the biofilter would be appreciated.

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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Grange, Adam

From: Dunmore, Katie
Sent: 29 November 2021 10:36
To: Tucker, Tania
Subject: RE: EWC 19 05 03 as a biofilter medium

Hi Tania,

FCC have confirmed three of their sites currently use 19 05 03 as biofilter medium; Edwin Richards Quarry EPR/HP3632RP, Maw Green Landfill and Welbeck Landfill.

I've looked at the Edwin Richards permit and the use of the medium is not included in the permit. This site has come up a lot during my determination as the operator wishes to use monitoring results taken at this site as a means to deviate from BAT with regards to capturing and containing diffuse emissions. We are disputing this.

We could however accept monitoring result from a filter as a means to permit an alternative medium. FCC have now also confirmed the AQ survey provided is based on CLO as a filter medium (although this is not stated in the report and other docs state woodchip)

I discussed the filter medium with Graham Raynes in Warrington. Graham hadn't heard of its use but suggested we could permit it with conditions.

Kind regards

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

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From: Tucker, Tania
Sent: 18 November 2021 14:04
To: Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Subject: RE: EWC 19 05 03 as a biofilter medium

Cheers for the update Katie.

I am going to have a chat with my colleagues (Kathy in biowaste) and my odour guru colleagues too. I may circulate to the odour network too. I share your unease.

Be very interested in the details of the sites it has been used – odd they don't seem to want to provide them?

Cheers Tan
Tania Tucker
E&B Senior Advisor (Non-hazardous & inert waste sector lead)
Environment Agency

tania.tucker@environment-agency.gov.uk

External: 020 302 56785 | Mobile: 07778050209

Working days: Monday to Friday

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From: Dunmore, Katie

Sent: 18 November 2021 13:23

To: Tucker, Tania <tania.tucker@environment-agency.gov.uk>

Subject: EWC 19 05 03 as a biofilter medium

Hi Tania,

I've received the below response from FCC as to why 19 05 03 is considered a suitable biofilter medium and how it meets BAT.

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.

Considering they need to cover the filter medium to reduce the potential for odour doesn't fill me with confidence.

I've asked which sites have this type of biofilter. This was raised across centre by the PPO group and it hadn't come up before.

I'm slightly concerned about accepting evidence from previous sites. This Daneshill application almost entirely comprises evidence (which I can't verify) from their other sites that they consider evidences there is no risk of emissions. This is particularly stark for the lack of mitigation for asbestos soil treatment. Its proving tricky to assess.

Any further thoughts you have on the biofilter would be appreciated.

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

☎ 02030 254435 (internal 54435) mob: 07584 369561

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

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<http://www.smartsurvey.co.uk/s/NPScustomer/>



Grange, Adam

From: Turner, Martin
Sent: 24 August 2020 11:14
To: Drewry, Joe
Cc: Hall, Chris; Limm, Reena; Wall, Clive; Jones, Rhidian; Waller, Alison; Akinyede, Edidiong
Subject: RE: F/4120 Daneshill Soil Treatment Facility

Importance: High

Hello Joe

I have tried to call [REDACTED] and he is in tomorrow so I will speak to him then.

I have spoken to my counterpart in West Midlands (Clive Wall) about the Rowley Regis site (Permit Ref HP3632RP) and they have significant concerns about this type of activity at the moment.

I have cc'd Chris Hall into this from E&B and Reena Limm who is dealing with the variation at Rowley Regis. Clearly this needs to be a co-ordinated response and the fact that they won't twin track the application is telling.

Chris / Clive / Reena – Any thoughts on how we further respond with this in this area?

Regards

Martin

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday but I do not work Thursdays



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for people and wildlife



From: Drewry, Joe
Sent: 14 August 2020 09:18
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Cc: Lowden, Tommy <Tommy.Lowden@environment-agency.gov.uk>
Subject: FW: F/4120 Daneshill Soil Treatment Facility

Hi Martin,

The planning authority have come back with more questions about Daneshill Facility. It sounds like the applicant doesn't want to twin track the application. Can you answer the questions that [REDACTED] asks below re the asbestos, activities and another site that we apparently regulate? Once you have had a look let me know what you think.

Kind Regards,

Joe Drewry

Planning Specialist

Sustainable Places – East Midlands

Please note my new telephone number

Email : joe.drewry@environment-agency.gov.uk

External : 02030 253277, Internal: 33277

From: [REDACTED]
Sent: 13 August 2020 16:17
To: Drewry, Joe <joe.drewry@environment-agency.gov.uk>
Subject: F/4120 Daneshill Soil Treatment Facility

Dear Joe

Temporary operations for 10 years for Soil Treatment Facility including Asbestos Picking Operations. Daneshill Landfill Site, Daneshill Road, Lound, DN22 8RB
<https://www.nottinghamshire.gov.uk/planningsearch/plandisp.aspx?AppNo=F/4120>

We have been reviewing the EAs comments on this application and I have also discussed with the applicant. I have a couple of points I would like your further help on if possible please.

In particular we note the comment /recommendation to twin track and I have read your guidance on this matter. The applicant advises me that they do not wish to go down that route and they want certainty of planning permission before committing costs to the permit application. I am however told that a draft permit application has been produced by the same project team as have put together the planning application. Whilst it is not compulsory to twin track it is a pertinent issue.

In your letter you cite the issue as being the sensitivity of the groundwaters and the need for more drainage details. I do not disagree with that, but such details could be dealt with by a planning condition. The main concern from the community with respect to the planning application is the fear of asbestos dust release. I wonder whether the recommendation to twin track also stems from the processing of this type of hazardous material, or whether the EA has any initial uncertainties about that activity and its emissions?

We further note the applicant's site at Rowley Regis (Edwins Richards Quarry) undertakes the asbestos processing/picking etc inside a building, whereas the Daneshill proposal is to be all outdoors. The applicant believes it has shown that the Rowley Regis site does not release asbestos dust and it can now do it outside at Daneshill. We note that you recently dealt with an application to vary the permit at Rowley Regis to increase the tonnages of haz wastes and allow outside storage of asbestos soils and for mechanical screening inside the building. That was withdrawn and we would like to understand why it was withdrawn and more about whether a building might be required for the proposed operations. If one was required it would almost certainly require a fresh planning application and is not something which we could secure under a planning condition. This all comes back to the twin-track recommendation.

Also do you have any monitoring role with the site at Rowley Regis? Do you have complaints or evidence of pollution/failures there or do you consider it to be a compliant operation with its permit and one which does not release asbestos dust.

I do hope you can help. This is proving more complex than I would have liked, but we need to have every reassurance for the community and our planning committee that this will be a regulated and safe operation.

Happy to discuss further.

Thank you


Principal Planning Officer
Nottinghamshire County Council

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Grange, Adam

From: Wall, Clive
Sent: 24 August 2020 12:59
To: Turner, Martin; Drewry, Joe
Cc: Hall, Chris; Limm, Reena; Jones, Rhidian; Waller, Alison; Akinyede, Edidiong; Hadley, Richard
Subject: RE: F/4120 Daneshill Soil Treatment Facility

Hello Martin,

As we discussed earlier on the phone, we in area do have concerns about the potential for release of asbestos fibres from the mechanical handling and screening of soils contaminated with asbestos. However the HSE have stated that the mechanical screening aspect does not raise any concerns provided that an adequate control regime is employed. We are considering this response and if / how we can incorporate such a control regime within our permit.

The site at Rowley Regis is currently permitted to receive such soils into a building, before hand picking asbestos fragments via an enclosed picking station within the same building. They carry out air asbestos monitoring at fixed points within the building during this activity. No results have been submitted that breach compliance limit. We are still processing the variation application to store such soils outside and to mechanically screen within the building – it has not been withdrawn.

Clive

Clive Wall

PPC Compliance Officer | West Midlands Area

Environment Agency | Sentinel House, 9 Wellington Crescent, Fradley Park, Lichfield, WS13 8RR

Contact | Mob: 07710 903407 | **Ext:** 02030252966 | **Int:** 52966 | **Email:** clive.wall@environment-agency.gov.uk
www.gov.uk/environment-agency

Incident management standby roles: EM Site Controller | EM Duty Officer | Tactical Liasion Officer



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Sent: 24 August 2020 11:14

To: Drewry, Joe <joe.drewry@environment-agency.gov.uk>

Cc: Hall, Chris <chris.hall@environment-agency.gov.uk>; Limm, Reena <reena.limm@environment-agency.gov.uk>;

Wall, Clive <clive.wall@environment-agency.gov.uk>; Jones, Rhidian <Rhidian.Jones@environment-agency.gov.uk>; Waller, Alison <alison.waller@environment-agency.gov.uk>; Akinyede, Edidiong <edidiong.akinyede@environment-agency.gov.uk>

Subject: RE: F/4120 Daneshill Soil Treatment Facility

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Thank you

[REDACTED]
Principal Planning Officer
Nottinghamshire County Council

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Grange, Adam

From: Turner, Martin
Sent: 04 September 2020 11:00
To: Hall, Chris
Cc: Wall, Clive; Drewry, Joe
Subject: FW: Daneshill Soil Treatment facility F/4120
Attachments: 30316 A5 ST Daneshill updated planning response 200902.pdf

Hi Chris

Is there any chance we could have a short chat about this early next week

I just need to know what our current position is with this type of activity so that we are singing from the same hymn sheet

Many thanks in advance

Martin

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

martin.turner@environment-agency.gov.uk

External: 020302 53332 |

Working days: Monday to Friday but I do not work Thursdays



From: Drewry, Joe
Sent: 03 September 2020 09:48
To: Turner, Martin <martin.turner@environment-agency.gov.uk>
Subject: FW: Daneshill Soil Treatment facility F/4120

Hi Martin,

I have been sent through the following from [REDACTED] at NCC. They talk about parts of the site and the other site at Rowley Regis. The document sounds like they have a permit for treating asbestos in the soil. Is this the case?

Joe

From [REDACTED]
Sent: 03 September 2020 09:36

To: Drewry, Joe <joe.drewry@environment-agency.gov.uk>

Subject: Daneshill Soil Treatment facility F/4120

Dear Joe

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I'm not clear whether pre-app with the EA is also a significant cost hindrance to them, but it may be possible through your letter to push them to start these discussions with the EA now. That might push the planning decision back once again potentially. We will have to consider our options.

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From: Hall, Chris
Sent: 07 September 2020 09:11
To: Turner, Martin
Cc: Wall, Clive; Drewry, Joe; Hadley, Richard; Limm, Reena
Subject: RE: Daneshill Soil Treatment facility F/4120
Attachments: Edwin Richards Quarry - EPR/HP3632RP/V003; RE: Edwin Richards Quarry - EPR/HP3632RP/V003

Martin

See attached. The discussion may come down to air emissions.

I do not know the status of the attached so please do not share externally.

We determined that the picking operation could go ahead. All monitoring thus far suggests that there is no fibre release from the permitted process.

But now the site want to extend the operation to a screener that will remove oversize materials from 17 09 03*, 17 09 04, 19 12 11* and 19 12 12 dual coded with 17 06 05* wastes. The oversized materials apparently:

- mask the presence of asbestos cement sheet fragments
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We are not certain that the screener will not increase the asbestos fibre level into the air – the operator is convinced that it will not. We have to choose between believing them and allow the operation to go ahead with monitoring, or not believe them and say the process is not BAT.

Chris

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Cc: Wall, Clive <clive.wall@environment-agency.gov.uk>; Drewry, Joe <joe.drewry@environment-agency.gov.uk>
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Environment Agency | Trentside Offices, Scarrington Road, West Bridgford,
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Sent: 03 September 2020 09:48
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Grange, Adam

From: Turner, Martin
Sent: 07 September 2020 10:01
To: Hall, Chris
Subject: RE: Daneshill Soil Treatment facility F/4120

Thanks Chris

Very good – that has helped enormously

I hope all is good your end

Martin

Martin Turner

Regulated Industry Officer

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford,
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