

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
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: Wall, Clive
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.

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: 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

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

mob: 07584 369561

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

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