

Grange, Adam

From: Raynes, Graham
Sent: 11 November 2021 15:36
To: Dunmore, Katie
Subject: RE: Asbestos soil treatment best practice guide

Thanks Katie,

Do you want to have a meeting to go through it? Not impressed that they aren't covering the storage.

Graham

From: Dunmore, Katie
Sent: 11 November 2021 14:52
To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>
Subject: RE: Asbestos soil treatment best practice guide

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

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: Raynes, Graham
Sent: 11 November 2021 11:30
To: Hall, Chris <chris.hall@environment-agency.gov.uk>; Murray, John <john.murray@environment-agency.gov.uk>; Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>
Cc: Hadley, Richard <richard.hadley@environment-agency.gov.uk>
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 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

✉ 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: 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*

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

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