

## Grange, Adam

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**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](mailto: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](mailto:mike.alexander@environment-agency.gov.uk)>; Dunmore, Katie <[katie.dunmore@environment-agency.gov.uk](mailto:katie.dunmore@environment-agency.gov.uk)>; Grills, Rachael <[rachael.grills@environment-agency.gov.uk](mailto:rachael.grills@environment-agency.gov.uk)>; Haines, Thomas <[Thomas.Haines@environment-agency.gov.uk](mailto:Thomas.Haines@environment-agency.gov.uk)>; Lythgo, Kirstie <[Kirstie.Lythgo@environment-agency.gov.uk](mailto:Kirstie.Lythgo@environment-agency.gov.uk)>; Miller, Stuart <[Stuart.Miller1@environment-agency.gov.uk](mailto:Stuart.Miller1@environment-agency.gov.uk)>; Morris, Chris <[chris.morris@environment-agency.gov.uk](mailto:chris.morris@environment-agency.gov.uk)>; Pople, Emily <[emily.pople@environment-agency.gov.uk](mailto:emily.pople@environment-agency.gov.uk)>; Smith, Jennie <[Jennie.Smith@environment-agency.gov.uk](mailto:Jennie.Smith@environment-agency.gov.uk)>; Barker, Paul <[paul.e.barker@environment-agency.gov.uk](mailto:paul.e.barker@environment-agency.gov.uk)>; DiStefano, Francesco <[Francesco.DiStefano@environment-agency.gov.uk](mailto:Francesco.DiStefano@environment-agency.gov.uk)>; Giles, Ruth <[Ruth.Giles@environment-agency.gov.uk](mailto:Ruth.Giles@environment-agency.gov.uk)>; Hann, Louise <[louise.hann@environment-agency.gov.uk](mailto:louise.hann@environment-agency.gov.uk)>; Hunt, Simon <[Simon.Hunt@environment-agency.gov.uk](mailto:Simon.Hunt@environment-agency.gov.uk)>; Palmer, Clara <[Clara.Palmer@environment-agency.gov.uk](mailto:Clara.Palmer@environment-agency.gov.uk)>; Pemberton, Emma <[emma.pemberton01@environment-agency.gov.uk](mailto:emma.pemberton01@environment-agency.gov.uk)>; Tearle, Jess <[Jess.Tearle@environment-agency.gov.uk](mailto:Jess.Tearle@environment-agency.gov.uk)>; Walker, Jake <[Jake.Walker@environment-agency.gov.uk](mailto:Jake.Walker@environment-agency.gov.uk)>; Wycherley, Miranda <[miranda.wycherley@environment-agency.gov.uk](mailto: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 1<sup>st</sup> 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 24<sup>th</sup> 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.**

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